

30 June 2016

David Fowler
Development Control
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C/O

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Dear Mr Fowler

**11 Blackburn Road London NW6 1RZ
2015/3148/P**

I write in respect of the above application which is currently pending determination. I was very grateful for your time during our telephone call last week during which we had a helpful discussion in respect of the application and some of the outstanding issues.

As I set out, we have been retained to advise the applicant in respect of the current planning application at the above site. The previous planning consultant is no longer instructed and we are working with the retained project architects Horden Cherry Lee (HCL) to advise upon all planning matters and to work within them and LPA officers to hopefully draw this application to a successful conclusion.

Below, I offer a series of comments under a number of sub headings, these principally relate to the effect of proposed amendments.

Amendments

As per your feedback to HCL, it is now proposed to amend the planning application in line with your comments.

Accordingly, it is proposed to remove the 2 residential flats at first floor level within the retained Victorian warehouse building. This will not now be extended at first floor as was the previously planned had this building been converted to residential use.

This results in a reduced total of 6 dwellings at the site. It also reduces the total residential floorspace to 1,057sq m (GEA)

| Current Drawing ref: To be superseded | Amended Drawing Ref | Title |
|--|----------------------------|---|
| 2101 rev G | 2101 rev H | General Arrangement Floor Plan - Ground Floor Level 00 |
| 2102 rev G | 2102 rev H | General Arrangement Floor Plan - First Floor Level 01 |
| 2103 rev G | 2103 rev H | General Arrangement Floor Plan - Second Floor Level 02 |
| 2104 rev G | 2104 rev H | General Arrangement Floor Plan - Third Floor Level 03 |
| 2105 rev G | 2105 rev H | General Arrangement Roof Plan |
| 2201 rev G | 2201 rev H | General Arrangement South Elevation |
| 2202 rev H | 2202 rev J | General Arrangement North Elevation |
| 2203 rev G | 2203 rev H | General Arrangement South Contextual Impact Elevation |
| 2204 rev G | 2204 rev H | General Arrangement East and West Elevation |
| 2301 rev H | 2301 rev J | General Arrangement Proposed Sections |

Affordable Housing

Given that the scheme is only marginally over the 1,000sqm threshold, the applicant proposes that this matter be addressed by way of a commuted payment.

This is consistent with the advice at paragraph 3.13 of Camden's Development Policies. The applicant has no control over any other site within the locality and your required amendments have notably reduced the quantum of residential development at this site.

It would be completely unrealistic to expect a scheme of this size to provide a dwelling on site. The scheme has now been reduced by a further 2 units to accommodate your concerns about retaining an acceptable level of Class B1 floorspace on this site.

Furthermore, each of the 6 houses have an approximate floorspace of 176sqm, well above the required level of affordable floorspace set out by the sliding scale.

I enclose (for your ease) of reference the email chain from April 2016 which was copied to you. This sets out that a leading RP would have no interest in a single flat at this site.

Having regard to the Council's sliding scale we consider that a policy compliant commuted payment will be;

| | | |
|--|---|--|
| <i>Total Residential Floorspace</i> | = | 1,057sqm GEA |
| <i>Affordable Housing Floorspace sliding scale</i> | = | 10.57% |
| <i>Total Affordable Housing floorspace requirement</i> | = | 111.7sqm (10.57% of 1.057sqm) |
| <i>Camden multiplier</i> | = | £2560 x 111.7 = <u>£296,068</u> |

The applicant is prepared to offer this as a policy compliant payment in lieu of on site provision.

I would be grateful for your comments in this regard.

Employment Contributions

The total existing employment floorspace is 708sqm (GEA) and it is proposed to retain 380sqm (GEA) of floorspace within the Victorian Building. This is flexible space capable of being occupied as 1 unit or several separately lettable units as shown on the drawings.

There is therefore a loss of 328sqm and the retained element is therefore equivalent to 54% of the existing floorspace.

We are cognisant of your Planning Obligations CPG and that you seek mitigation in the form of a payment for the loss of employment floorspace. Based upon the formula at paragraph 8.13 of CPG8 we calculate this to be;

*Gross employment floorspace lost = **328** sqm / 12sq m (space requirement per full time employee1) = **27.3** full time jobs lost.*

*Full time jobs lost **27.3** x 23% [% of Camden residents in the workforce] x £3,995 [cost to provide training per employee] = **£25,084***

On the basis of this calculation, the applicant is willing to make this payment under the S106 Agreement. Can you advise if you are agreement with this calculation?

I believe that in making these amendments, this addresses the outstanding matters in respect of the application.

The applicant is keen to progress matters as speedily as possible (and my appointment is part of this process)

We would hope that these amendments now allow you to recommend the application for approval (subject to a S106 Agreement) and once you have been able to consider the content of this letter I would be grateful for a discussion in terms of agreeing a timetable moving forwards to determination.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in blue ink, appearing to read "D. Whittington".

David Whittington
Director



From: Billie Lee <blee@hcla.co.uk>
Subject: Re: 11 Blackburn Road affordable housing
Date: 25 April 2016 10:24:18 BST
To: David Fowler <David.Fowler@camden.gov.uk>
Cc: Iain Blakeley <iain.blakeley@welbeckim.com>, Peter Klimt <peter.klimt@welbeckim.com>, Carlos Morales <cmorales@hcla.co.uk>

David

Please see below the response from Gareth Jones at Origin Housing, I think its fair to say his concerns would be shared by other RSL's.

Please let me know what we need to do to progress the application.

Many Thanks

Billie

Billie Lee
for Horden Cherry Lee Architects

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On 21 Apr 2016, at 18:09, Gareth Jones wrote:

Billie, sorry not to have responded before. I was leaving this to the end of the day over a long period but it never got to the top of the pile, so I am correcting that now to release you from pursuing me.
The reasons why our housing team defer did not want to proceed with this single flat in the scheme was due to the lack of viability of managing just one home in a scheme managed by a third party agent and the need to agree service charges and other management items.
The location within the block, levels of service cost were also issues for providing a single affordable home.
Apologies for the brevity of response, but trust this captures the main concerns underpinning our decision.

Kind Regards

Gareth Jones
Director of Development
Origin Housing Ltd
St Richard's House
110, Eversholt Street
London
NW1 1BS
Direct Tel: 0207 209 9287
Mobile: 07789 267280



From: Billie Lee [<mailto:blee@hcla.co.uk>]
Sent: 21 April 2016 16:55
To: Gareth Jones
Cc: Iain Blakeley; David Fowler; Carlos Morales; Peter Klimt
Subject: Re: 11 Blackburn Road affordable housing

Gareth

As you are aware we are trying to establish the best way for our client to contribute towards affordable housing as part of the planned project at 11 Blackburn Road.

You are obviously very busy and have not been able to respond to my email dated 30th March.

You may recall that when we talked earlier in the year; you explained to me the difficulties of managing one unit in isolation, (ie not a series of units as part of a bigger scheme), along with other concerns about large units sizes, values and the entrance / common shared area arrangements, and in conclusion you do not believe that 11 Blackburn road is project Origin Housing could be part of, owning, maintaining and managing a single unit.

I am trying to provide LBC with conclusive advice about this and have drafted this email to you, in the hope we can close out the matter.

If you could please respond I would most appreciate you time, however if this is not possible I trust that LBC will accept your non-response and conclusive evidence you do not wish to take on the unit under discussion.

Many thanks for your consideration of this matter.

Regards

Billie Lee

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for Horden Cherry Lee Architects

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On 30 Mar 2016, at 13:09, Billie Lee wrote:

Gareth

As previously discussed with you, we are trying to progress the above planning application with Camden Planning team, we have been asked to provide LBC evidence about the lack of attraction of this scheme has, in respect of providing on site affordable housing.

Could you please help by providing a short statement.

Please let me know if you are prepared to help us with this, if so perhaps I should call to refresh you on the details of the project ?

If you are not able to help please advise.

Many Thanks for your consideration of this.

Billie

Billie Lee
for Horden Cherry Lee Architects

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From: "Fowler, David" <David.Fowler@camden.gov.uk>

Subject: RE: 11 Blackburn Road

Date: 12 February 2016 09:54:25 GMT

To: Billie Lee <blee@hcla.co.uk>

Cc: Carlos Morales <cmorales@hcla.co.uk>, Iain Blakeley <iain.blakeley@welbeckim.com>, "Baines, Tom" <Tom.Baines@camden.gov.uk>, "Cleary, Neil" <Neil.Cleary@camden.gov.uk>

Billie,

1. Employment contribution

Please see the email attached from my colleague in Economic Development, which outlines where the employment contribution figure comes from.

2. Affordable housing

Can I refer you to Camden Development Policy DP3 (<https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/development-policies/>). There is a cascade within this policy where affordable housing should be provided:

- i) On-site
- ii) off-site
- iii) through a payment in lieu (pil), in exceptional circumstances.

I note you have spoken to someone at Origin. Please could you ask them to send something through to demonstrate that they would not wish to take on any unit(s) at this site?

Based on this, if we agree that affordable housing cannot be provided on-site, you would need to look at off-site provision before jumping to the pil. I would advise you to speak to Neil Cleary, an Affordable Housing Development Co-Ordinator, with regards to potential sites in the area. I have copied Neil in to this email. His telephone number is 7974 1341.

Should the first 2 parts of the policy cascade not be viable options, at that point we would consider the pil.

Please note there have been a number of objections on the lack of affordable housing and for Members to approve this scheme they would need to be satisfied that the provision was policy compliant.

Regards,

David

David Fowler
Principal Planning Officer

Telephone: 0207 974 2123



From: Billie Lee [<mailto:blee@hcla.co.uk>]
Sent: 29 January 2016 15:13
To: Fowler, David
Cc: Carlos Morales; Iain Blakeley
Subject: 11 Blackburn Road

David

Many Thanks for taking the time to talk this morning.

1. Employment Contribution

Can you please provide me with a breakdown of the calculation you used to arrive at the proposed £71,910 contribution.

2. Affordable House

Many thanks for sending through the RSL contacts

I have spoken with Gareth Jones at Origin, he reiterated my concerns that managing one unit is not very economic or attractive, a minimum of 10 is ideal. Anyway, I explained the two units types we have; the two apartments and the townhouses, he felt that the area (values) and unit sizes (large) would lead them towards intermediate rented accommodation, the maximum rental income based on a salary of £50-60,000 would be £1,000 per month, giving a property value of £250,000.

So in short, they would not readily take on a single unit, and the budget they would have to purchase such a unit (250k) would not afford a unit in our scheme.

How best can we progress this, if LB Camden would accept a financial contribution how can we arrive at a mutually acceptable figure ?

Many Thanks for your consideration of these matters.

Billie Lee

Billie Lee
for Horden Cherry Lee Architects

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