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**FAO David Peres Da Costa**  
**Via email only**

29<sup>th</sup> October 2019

Dear David

**Planning Application 2018/4916/P - 254 Kilburn High Road, London, NW6 2BS**

**The creation of 6 x residential dwellings within the permitted 6th floor, the installation of set-back windows to the exterior elevation at 6th floor level, the creation of external private amenity space and the provision of an additional cycle parking spaces.**

I write to you regarding the above planning application and the requirements surrounding the delivery of affordable housing following the recent resolution to grant planning permission.

#### **Planning background**

The application site relates to No.254 Kilburn High Road which is located on the east side of Kilburn High Road, located to the rear of a terrace of buildings fronting the road. The site was previously occupied by a workshop (Class B2 and B8) located within a four storey Victorian building to the rear of the site and two single storey double height warehouse buildings.

In December 2016, planning permission (**2015/2775/P**) was granted for the redevelopment of the site (following demolition of existing buildings) to provide a mixed use development comprising the erection of a six storey building to provide 955sqm of commercial space (Classes B1 and B8) on the ground floor and 60 dwellings to the upper floors. The development has commenced.

Most recently, planning permission (**2018/4916/P**) has been sought for the creation of 6 x residential dwellings to the building within the permitted 6th floor. The Council resolved to grant permission subject to a legal agreement requiring one of the approved units to be delivered as affordable housing (as an intermediate rent unit). The application is currently pending determination whilst the details surrounding the affordable housing provision are being negotiated.

## **Affordable housing requirements**

Policy H4 of the Camden Local Plan seeks to maximise the supply of affordable housing in the borough. The policy states, the Council 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. 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. Based on 498sqm GIA of additional housing floorspace proposed within the application, this would result in a requirement for 10% affordable housing which is equivalent to 49.8sqm of affordable floorspace.

The Policy advises that where developments have capacity for fewer than 10 dwellings, the Council will expect a payment-in-lieu (PIL) of affordable housing. However, in the circumstances of this application, as the proposal was considered part of a larger approved scheme, the Council required the affordable housing to be provided on site. At the time the application was reported to Members it was agreed that one intermediate rent unit would be provided at the 6<sup>th</sup> floor level (apartment 604b) to fulfil the affordable housing requirement. This would be secured by a legal agreement.

Following discussions between the applicant and Origin Housing (a registered housing provider), it has been confirmed that they would not be willing to support the provision of the single proposed intermediate rented housing unit. The reasoning for this is that the unit would be located in a different core to the rest of the affordable units and would not work for Origin Housing in terms of their ongoing management. (Please refer to the attached letter from Origin Housing dated 25/10/2019). We also understand this has been reported to Camden directly under separate cover. In this context, the provision of the one affordable housing unit on site would therefore not be practical, and as set out in criterion (i) of Policy H4, it is therefore requested that the option of a payment in lieu is agreed as an alternative mechanism for ensuring housing delivery.

## **Conclusion**

I look forward to receiving confirmation that the above is accepted by officers, and it would be appreciated if this updated position could be reported to Members at the next available members briefing. I trust the above is helpful but if you require any more detail or have any further questions please do not hesitate to contact me.

Yours sincerely

**Stuart Minty**  
**Director**  
**SM Planning**