



# Regent's Park Estate

Planning Statement Addendum

April 2020

**Tibbalds**

planning and urban design

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# 1 Introduction

1.1 This Planning Statement Addendum has been prepared by Tibbalds Planning and Urban Design on behalf of the London Borough of Camden (“the applicant”).

The Planning Statement Addendum forms part of the planning application submitted to London Borough of Camden as local planning authority (“the LPA”) for the Regent’s Park Estate.

For clarity, references to LPA in this Statement relate to LBC in its capacity as the Local Planning Authority, as opposed to its position as landowner and applicant.

This Planning Statement Addendum should be read with the Planning Statement which was submitted in July 2019 as well as the other application and supporting material.

## 2 Amendments

2.1 Since the original submission in July 2019, there has been a change to the planning application in response to the requirements of the applicant. In summary, this change is as follows:

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### Phase 1

- **Affordable Housing:** Phase 1 of the original planning approval was 100% affordable homes split between 70 social rented homes and 24 intermediate homes. In order to be able to accommodate the changing housing need of residents, two intermediate units were allocated as social rented homes as larger units were required to alleviate overcrowding for affected residents. This was highlighted in the July 2019 S73 submission.
- Since this time, the applicant has been able to use retained right to buy receipts to convert 18 of the previously proposed intermediate units in Phase 1 to much needed social rented units. Phase 1 is now split between 88 social rented units and 6 intermediate units.

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### Phase 2

- **Affordable housing:** Due to the complexity of managing mixed tenure stair cores the applicant has proposed that the affordable housing units are grouped together in one block rather than split across the two blocks in Phase 2.
- Since the submission of the July 2019 application, the applicant has been able to convert all of the previously proposed intermediate units within phase 2 to social rented units. Phase 2 is now split between 11 social rented units and 13 private units. Affordable and private units remain in separate blocks.

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### Affordable Housing Plan

2.3 The Affordable Housing Plan was discharged under Condition 42 and has been updated as part of this submission to reflect the changes in tenure mix.

## 3 Background to the proposed changes

### Phase 1 changes

3.1 The approved housing and tenure mix for Phase 1 of the existing planning consent was based on a housing needs assessment of affected residents within the Regent's Park Estate. The housing needs assessment was a snapshot of the community living in the 'red blocks' at the time of the planning submission but the very nature of the assessment means that this is subject to change as the make-up of households changes frequently.

3.2 Since the July 2019 submission, the applicant has also benefited from the ability to convert 18 of the previously proposed intermediate units in Phase 1 to social rented units. Comparison tables showing the approved and proposed mix of affordable units for Phase 1 are set out below.

	Approved									Total
	Social Rented					Intermediate				
	SR 1B	SR 2B	SR 3B	SR 4B	SR 5B	INT 1B	INT 2B	INT 3B	INT 4B	
Robert St Car Park	1	1	6	1			4			13
Rydal Water (former One Stop shop)	15	1wc	2				6			24
Varndell Street Corner		1	5	1	1					8
Newlands Plot	8 (1wc)	12	3	5			2		1	31
Cape of Good Hope	1		3			4	2	5		15
St Bedes	1wc		2							3
<b>Total units</b>	<b>70</b>					<b>24</b>				<b>94</b>

	Proposed									Total
	Social Rented					Intermediate				
	SR 1B	SR 2B	SR 3B	SR 4B	SR 5B	INT 1B	INT 2B	INT 3B	INT 4B	
Robert St Car Park	1	4	6	1			1			13
Rydal Water (former One Stop shop)	15	5	2				2			24
Varndell Street Corner		1	5	1	1					8
Newlands Plot	8 (1wc)	14	3	6						31
Cape of Good Hope	4		8			1	2			15
St Bedes	1wc		2							3
<b>Total units</b>	<b>88</b>					<b>6</b>				<b>94</b>

## Phase 2 changes

3.3 In order to alleviate the housing management issues associated with managing multi-tenure stair cores it is proposed that all of the units at the Victory Pub site are reallocated as affordable homes to provide a mixture of social rented and intermediate homes within one block. The private units that were within the Victory Pub site are proposed to be reallocated within the Dick Collins Hall site to provide a 100% private sale block in this location. The changes have been designed to maintain the same overall provision of affordable housing.

3.4 Due to changes in housing need the mix of unit sizes across both blocks in Phase 2 has been reviewed and rationalised to provide a mix that better meets the needs of the community. The changes have been balanced to ensure that there is still a good split between larger and smaller unit sizes within each tenure that broadly accords with the housing priority table within Camden's Local Plan.

3.5 The tables below set out the approved and proposed tenure mix, habitable room, floorspace and unit size split:

		Additional Homes - Existing															
		Social Rented					Intermediate					Private					
Plot no.	Plot Name	1B	2B	3B	4B	5B	1B	2B	3B	4B	5B	1B	2B	3B	4B	5B	Total
4	Newlands Plot	1wc															1
5	Dick Collins Hall		1wc			2	1		1			1		5			11
8	The Victory Pub	1		1	1		1	2					1	3			10
	Total Units	7					5					10					22
	Affordable / Private split by units	12 (55%)					10 (45%)										100%
	Affordable split by tenure	58%					42%					N/A					N/A
	Habitable Rooms	34					12					45					91
	Affordable / Private split by hab room	46 (50.5 %)					45 (49.5%)										100%

		Additional Homes - Proposed															
		Social Rented					Intermediate					Private					
Plot no.	Plot Name	1B	2B	3B	4B	5B	1B	2B	3B	4B	5B	1B	2B	3B	4B	5B	Total
4	Newlands Plot	1wc															1
5	Dick Collins Hall										4	9					13
8	The Victory Pub	2	5	3													10
	Total Units	11					0					13					24
	Affordable / Private split by units	11 (46%)					13 (54%)										100%
	Affordable split by tenure	100%					N/A					N/A					N/A
	Habitable Rooms	37 (51%)					0					35 (49%)					72
	Affordable / Private split by floorspace	948 (49.5%)					965 (50.4%)										1,913

## 4 Affordable Housing

4.1 Policy H4 of the Camden Local Plan sets out the Council's aim to maximise the supply of affordable housing in the borough. The policy requires an affordable housing target of 50% where developments have capacity for over 25 dwellings, provided on-site. At the time of the original submission affordable housing was measured by floorspace whereas now this is calculated based on habitable rooms. Both habitable room and floorspace figures are policy compliant.

4.2 The policy also requires that a guideline mix of affordable housing types is 60% social affordable rented housing and 40% intermediate, although it is noted that this Council-led scheme is based on housing needs assessment.

4.3 The legal agreement attached to the existing planning consent set out a number of different 'scenarios' for affordable housing in the event that HS2 did not go ahead in the way it was foreseen at planning application stage. As part of this, there was a requirement to submit for approval an Affordable Housing Plan setting out which scenario was being taken forward, where the affordable units were located, the mix of unit sizes and the tenure split between intermediate and social rent. This Affordable Housing Plan was submitted and approved on the basis of Scenario 1, described in the shadow S106 Agreement as: *"where the HS2 Railway Scheme goes ahead on time and in accordance with the Government's scheduled commencement date programmed as at the date of this Agreement for January 2017"*. The plan was approved on the basis of the 'additional' Phase 2 units being delivered in line with the principles of other Community Investment Programme sites (a minimum of 50% affordable housing).

4.4 As shown in the above Phase 1 comparison tables the approved Affordable Housing Plan demonstrated a split of 70 social rented units and 24 intermediate units equating to 76% social rented and 24% intermediate provision when measured by habitable room. The amended proposals, retaining 100% affordable units, will result in 18 of the intermediate units becoming social rented units meaning that the new provision is 88 social rented units (89%) and 6 intermediate units (11%). Whilst this change tips the balance of tenure split very much in one direction, compared with the policy objective of achieving a 60/40 split, the change significantly boosts the percentage of much needed social

rented homes in the borough, based on housing needs assessment.

4.5 As shown in the above Phase 2 comparison table, Dick Collins Hall plot was originally approved as providing 11 units with a tenure mix of 3 x social rented units, 2 x intermediate units and 6 private units. The proposal is to increase the number of units in Dick Collins Hall from 11 to 13 by altering the unit sizes within the same overall consented massing and change the tenure so that all units are market sale.

4.6 The Victory Pub plot was originally approved as providing 10 units with a tenure mix of 3 x social rented units, 3 x intermediate units and 4 x private units. The proposal is to change the tenure so that all units are affordable (10 social rented units).

4.7 A single unit within the Newlands plot (Phase 1) was, under the original application, included in the overall calculation for the Phase 2 affordable housing. As such, this unit is again taken into consideration for the proposed affordable housing calculations, resulting in 11 affordable units in Phase 2.

4.8 Overall, the originally approved scheme would provide a total of 12 affordable units and 10 private units within phase 2, split across Dick Collins Hall, The Victory Pub and the single unit within Newlands plot. This equates to 50.5% affordable housing by habitable room (HR) for phase 2.

4.9 The revised proposal for phase 2 is to provide 11 affordable units (The Victory Pub) and 13 private units (Dick Collins Hall). This (together with the Phase 1 Newlands unit, as previously incorporated) equates to 51% of the units being affordable when calculated by HR. Of the 10 (+ Newlands plot) affordable units being provided, all of these are proposed as social rented units.

4.10 The proposed amendments to phase 1 would ensure that 100% of units would remain affordable with a minor change to the tenure mix to suit housing need and provide a greater number of social rented units. The combined amendments for phase 2 would result in the overall number of units rising from 22 to 24 units and would result in 51% of units across the plots being affordable and 49% private (by HR). The proposals are in accordance with the London Plan and Camden's Local Plan.

## 5 Housing Mix

5.1 Policy H6 of the Camden Local Plan addresses the overall need for a mix of housing types. The policy requires that homes are high quality and accessible and secure a varied mix of homes.

5.2 Policy H7 addresses Camden's desire for developments to deliver large and small homes. It states that Camden takes a flexible approach to assessing the mix of dwellings sizes proposed in each development and will have regard to the different dwelling size priorities for social-affordable rented, intermediate and market homes.

5.3 The policy also acknowledges that the rigid application of dwelling size priorities can prejudice the financial viability of a development and will consider adjusting the mix of dwellings (particularly the mix of market dwellings) in order to achieve the maximum reasonable amount of affordable housing floorspace on the site.

5.4 Dwelling size priorities for Camden are set out below:

	1bed	2bed	3bed	4bed
Social affordable	lower	high	high	medium
Intermediate	high	medium	lower	lower
Market	lower	high	high	lower

5.10 For Phase 1, the proposed mix of units for the social affordable tenure is: 29 x 1 bed (33%), 24 x 2 bed (27%), 26 x 3 bed (30%), 8 x 4 bed (9%) and 1 x 5 bed (1%). This mix is broadly in accordance with the Local Plan mix table.

5.11 The proposed mix of units for the intermediate tenure is: 1 x 1 bed (17%); and 5 x 2 bed (82%). This mix is broadly in accordance with the objectives of the above Local Plan mix table.

5.12 For Phase 2 the proposed mix of units for the social affordable tenure is: 3 x 1bed (27%); 5 x 2b (46%); and 3 x 3b (27%). This mix is broadly in accordance with the objectives of the above Local Plan mix table.

5.14 The proposed mix of units for the market tenure is: 4 x 1b (31%); and 9 x 2b (69%). This mix is broadly in accordance with the targets set within the above Local Plan mix table.

5.15 The proposed mix of unit sizes provide a range of homes within the lower, medium and high priorities, as set out in the above Local Plan mix table (policy H7).



## **7 Conclusion**


7.1 The July 2019 application for minor material amendments to the approved planning permission ref. 2015/3076/P sought permission for changes to phases 1 and 2 of the approved scheme including the affordable housing mix, unit size mix and external elevations in order to better accommodate the needs of the displaced community at the Regent's Park Estate.

7.2 Since this time, the applicant has been able to convert 22 of the originally proposed intermediate units to social rented units. The amendments to phase 1 retain 100% affordable housing levels and deliver greater than policy requirement levels of affordable housing, providing 18 previously allocated intermediate units as social rented units.

7.3 The amendments to phase 2 deliver greater than policy requirement levels of affordable housing of 51% (by habitable rooms) all provided as much needed social rented units.

7.4 The proposed housing mix for the amended blocks within phases 1 and 2 is broadly in accordance with the dwelling size mix table within policy H7 of Camden's Local Plan and reflects the current housing need.

7.6 For the above reasons, the minor material amendments are acceptable in planning policy terms.

An aerial photograph of a city street grid, overlaid with a semi-transparent red color. The grid consists of numerous rectangular blocks and streets, with some larger, more prominent buildings visible. The overall appearance is that of a dense urban environment.

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