



## Affordable Housing Statement for a single dwelling at 28 Avenue Road, London NW8 6BU.

**On behalf of Mr Mahtani**

February 2021

Rev C

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# 1.0 Introduction

- 1.1 This Affordable Housing Statement is submitted on behalf of Mr Mahtani in support of the planning application submitted by HGH Consulting Ltd, in respect of land at 28 Avenue Road, London NW8 6BU for a single dwelling.
- 1.2 This Statement includes an assessment of relevant Development Plan policies, material considerations and other guidance that are relevant to the site and proposed development. In doing so it defines the housing needs that will be met by the developer, together with details of its affordable housing offer.
- 1.3 This statement comprises 6 sections:
- Section 2 details the site and its surroundings;
  - Section 3 defines the planning policy framework in the form of the Development Plan and any material considerations;
  - Section 4 provides details on the scheme including details of the Affordable Housing proposed.
  - Section 5 considers the proposals in light of the planning policy framework; and
  - Section 6 brings together our conclusions.

## 2.0 Site and Surroundings

- 2.1 The application site is the London Borough of Camden, situated on Avenue Road between Radlett Place and Rudgwick Terrace. Primrose Hill is to the east of the site and Regents Park approximately 500m south of the site.
- 2.2 The site is accessed from the B525 Avenue Road.
- 2.3 This leads to what is currently an area of open land with a tennis court and a gate house on it.
- 2.4 The site frontage is walled with a large gated entrance. The other boundaries are mostly tree lined and hedging.
- 2.5 In terms of assessing Affordable Housing Policy, this falls to be considered under Policy H4 of the extant Camden Local Plan (2017) and the CPG on Housing dated January 2021.

## 3.0 Planning Policy Framework

- 3.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 The Development Plan for the area comprises the Camden Local Plan (2017) and the Housing CPG as amended in Jan 2021. We have carried out our assessment against the criteria in the Local Plan and updated CPG.
- 3.3 Other material considerations include the National Planning Policy Framework (NPPF Feb 19), the Planning Practice Guidance (PPG) (Sept '19) and Camden Annual Monitoring Report 2018-19.

### The Development Plan

#### Camden Local Plan (2017)

- 3.4 The Local Plan was adopted in February 2017 and seeks to guide development up to 2031.
- 3.5 The Local Plan sets out the Council's vision in terms of delivering housing to meet local housing need as a whole and Affordable Housing in particular.
- 3.6 The Local Plan in terms of housing requirements is supported by the updated CPG amended in January 2021.
- 3.7 Policy H4 of the Local Plan sets out the requirements and the criteria pertaining to the delivery of Affordable Housing as follows:

#### *Policy H4 Maximising the supply of affordable housing*

*The Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.*

*We 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. The*

*Council will seek to negotiate the maximum reasonable amount of affordable housing on the following basis:*

- a) the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing;*
- b) targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home;*
- c) targets are applied to additional housing floorspace proposed, not to existing housing floorspace or replacement floorspace;*
- d) 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;*
- e) an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;*
- f) for developments with capacity for 25 or more additional homes, the Council may seek affordable housing for older people or vulnerable people as part or all of the affordable housing contribution;*
- g) where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;*
- h) for developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site; and*
- i) where affordable housing cannot practically be provided on site, or offsite provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing offsite in the same area, or exceptionally a payment-in-lieu.*

*We will seek to ensure that where development sites are split or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution is comprehensively assessed for all the sites together. The Council will seek to use planning obligations to ensure that all parts or phases of split or related sites make an appropriate affordable housing contribution.*

*In considering whether affordable housing provision should be sought, whether provision should be made on site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:*

- j) the character of the development, the site and the area;*
- k) site size and any constraints on developing the site for a mix of housing including market and affordable housing, and the particular types of affordable provision sought;*
- l) access to public transport, workplaces, shops, services and community facilities;*
- m) the impact on creation of mixed, inclusive and sustainable communities;*
- n) the impact of the mix of housing types sought on the efficiency and overall quantum of development;*
- o) the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and*
- p) whether an alternative approach could better meet the objectives of this policy and the Local Plan.*

*Where the development's contribution to affordable housing falls significantly short of the Council's targets due to financial viability, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution, based on the initial shortfall and an updated assessment of viability when costs and receipts are known as far as possible.*

- 3.8 In respect of the amount of affordable housing that is required from the subject site, sub-paras b, c, and e apply for the reasons set out below.
- 3.9 In respect of how the affordable housing is delivered, sub-paras h and l apply for the reasons set out below.
- 3.10 In consideration of whether an affordable housing provision should be made on site or off-site, including the scale and nature of the provision, sub paras j-p need to be considered as set out below.

### 3.11 Site Capacity

The proposed scheme is for a single dwelling; however, it is a large one with a Gross Internal Area of 2,460sqm including the pool house and Tennis pavillion. The existing gate house is intended to be refurbished, but not extended, so no additional floor area is created in this respect. Using the Policy H4's criteria as set out in sub-paras b and c, that 100sqm of additional GIA would provide one additional unit, the notional site capacity is 24.6 units.

3.12 As noted under sub para d, for sites with a capacity of 1 and 25 units the affordable housing target of 2% per 100sqm applies. Therefore, a target of 49.2% or 1,210.3sqm GIA is applicable.

### 3.13 On or off-site provision

Sub-para h states that where sites have a capacity for more than 10 units the provision of affordable housing should be made on site. However, this falls to be considered in the context of sub-paras j-p as follows:

- j) Character of the development, the site and area
- k) Site size and constraints for mixed tenure development

The site falls within Swiss Cottage ward and the surrounding properties are either large individual dwellings or mansion blocks of flats dating from the 20<sup>th</sup> Century. The site itself is narrow at the front and opens out at the back on the East side. The shape of the site has dictated that the proposed dwelling is sited in the North East area where it is widest but also surrounded by other buildings thus extending the built form of Radlett Place. Whilst it would be possible to envisage another building on the site to the south of that proposed, this would compromise the openness of the site and potentially necessitate a reduction in the size of the proposed dwelling which in turn would reduce the affordable housing requirement.

- l) Access to public transport and facilities

The site lies approximately 600m from the nearest convenience shops (See Appendix B). Avenue Road is on the main local bus routes (See Appendix C). St John's Wood underground station is 500m away. There are no overground stations within walking distance of the site. The local doctor's surgery is 600m from the site and the nearest Hospital is the Royal Free which is 1.7km from the site (See Appendix D).

m) Impact on creation of mixed, inclusive and sustainable communities

Clearly the addition of affordable housing would aid the socio-economic mix of the area, however the type of site and development would lead to increased costs for any tenants who were allocated an affordable unit on the site, by way of service charge for grounds maintenance and shared services. Shared Ownership housing would not work in this location as the pricing would be beyond the affordability limits set by the GLA.

n) the impact of the mix of housing types sought on the efficiency and overall quantum of development.

As noted under sub-paras j and k above, the scheme proposal for a single large dwelling and the shape/context of the site does not lend itself to the addition of a small block of Affordable Housing. The two types of housing would conflict in terms of amenity space thus making the site over-developed and not in keeping with its surroundings. This would not be an efficient use of the site – as noted above any provision of Affordable Housing on site may lead to a reduction in the quantum of affordable housing required and thus this becomes a circular argument as to the maximum reasonable provision as required by the Local Plan and the London Plan.

o) The viability of the proposed scheme

The applicant does not take issue with the ability of the development to provide an affordable housing contribution in-line with policy as noted below.

p) Whether an alternative approach could better meet the objectives of this policy and the Local Plan.

We believe the needs of the community as set out by Policy H4 are best served by the provision of Affordable Housing off-site in this instance as allowed by Policy H4 sub-para i). This will maximise the provision of Affordable Housing and ensure with the assistance of the Council's Housing department that it meets the needs of the local community.

This can be done in one of three ways:

1. Identification of off-site residential or commercial property that can be used for the provision of affordable housing including the development and/or conversion of a property or site to suit;
2. Identification of existing Affordable Housing schemes where the tenure of units can be changed to better meet the needs of the local community in the Borough; or
3. Payment of a commuted sum to the Council such that it might use it on one of its own schemes for the provision of Affordable Housing or by provision of grant to increase the level of Affordable Housing on an RP lead scheme.

These three options are considered in section 5 below.

- 3.14 The draft new CPG (Jan 21) sets out the methodology relating to the target for providing off-site affordable housing. In essence this requires that where additional floorspace is provided off-site, in order to meet the affordable housing related to the subject site then the aggregate floorspace will be multiplied by 49.2% as the affordable housing target. However, para 5.39 advises that where market housing is converted to affordable housing the area of this housing will be netted off the initial on-site target, ie: aggregation will not apply.
- 3.15 In respect of the location of the off-site provision of affordable housing the new CPG advises at para 5.29 that flexibility will be shown reflecting the availability of suitable sites. As the subject site is north of Euston Road, the delivery site must in the ward of the subject site or those north of Euston Rd.

## 4.0 Affordable Housing Commuted Sum

- 4.1 The notional site capacity is 24.6 units, as noted above. The applicable Affordable Housing target is therefore 49.2% as required by Policy H4. The proposed scheme is 2,460sqm GIA and therefore the Affordable Housing provision equates to 1,210.32sqm.
- 4.2 As set out in the CPG (Jan 21) at with regard to the potential off-site commuted sum, section 6 of the CPG advises that the GIA should be multiplied by £5,000 per sqm to calculate the payment. Thus, the total commuted sum which could be required in this instance is 1,210.32 sqm x £5,000 = £6,051,600.

## 5.0 Options for Affordable Housing Provision

5.1 The aim of this section is to discuss how the Affordable Housing can be delivered and to demonstrate the steps the applicant has taken in this regard.

5.2 Option 1 - Identification of off-site residential or commercial property that can be used for the provision of affordable housing.

5.2.1 We have identified the residential and commercial units listed at Appendix A which are currently for sale on the open market. We would propose that some of these units could be purchased up to a maximum GIA of 1,210.31 sqm to satisfy the affordable housing requirement by converting the commercial units to residential use in cooperation with the Council or a Registered Provider.

5.2.2 We have spoken to Orchard and Shipman Homes who are a Registered Provider who specialise in the management of Affordable Housing and particularly the provision of housing which replaces nightly booked accommodation for those most in need. They would be willing to source suitable properties using the commuted sum within agreed parameters which can be set out in the S.106 agreement.

5.3 Option 2 - Identification of existing Affordable Housing schemes where the tenure of units can be changed to better meet the needs of the local community in the Borough.

5.3.1 We have spoken to the following Registered Providers who have confirmed that at present they do not currently have any schemes which could benefit from the allocation of a commuted sum for this purpose:

A2 Dominion Housing Group

Clarion Housing Group

Hyde Housing Group

Notting Hill Genesis

Octavia Housing

Orbit HA

One Housing Group

Origin Housing

Peabody Housing

- 5.3.2 The applicant is willing for us to monitor the opportunities that may become available during the application process from these and other RPs to see if the affordable housing provision can be satisfied in this way.
- 5.4 Option 3 - Payment of a commuted sum to the Council such that it might use it on one of its own schemes for the provision of Affordable Housing or by provision of grant to increase the level of Affordable Housing on an RP lead scheme.
- 5.4.1 The applicant is aware through the Council's policies this is the least preferred option and they will continue to pursue Options 1 and 2 above in terms of direct delivery and only resort to a commuted sum if and when all other options have been exhausted and as agreed with the Council.

## 6.0 Conclusions

- 6.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to boost significantly the supply of housing and local authorities should seek to meet their full objectively assessed needs of market and affordable housing.
- 6.2 The adopted Local Plan identifies in Policy H4 that sites with a notional capacity for 24.6 units or more should provide Affordable Housing at a rate of 49.2%; that is the case with this scheme notwithstanding the fact that the proposal is for a single dwelling.
- 6.3 The nature, characteristics and context of the site and proposed scheme do not lend themselves to on-site provision of Affordable Housing.
- 6.4 Having considered the criteria in Policy H4 relating to the provision of Affordable Housing off-site, three options have been explored:
1. Identification of off-site residential or commercial property that can be used for the provision of affordable housing;
  2. Identification of existing Affordable Housing schemes where the tenure of units can be changed to better meet the needs of the local community in the Borough; and
  3. Payment of a commuted sum to the Council such that it might use it on one of its own schemes for the provision of Affordable Housing or by provision of grant to increase the level of Affordable Housing on an RP lead scheme.
- 6.5 With regard to Option 1, attached at Appendices A and B are suitable residential and commercial properties that could be utilised to meet the Affordable Housing requirement. The applicant is willing to pursue this option and work with the Council to fulfill its obligation.
- 6.6 With regard to Option 2, our enquiries show that at present this is not something that RP's have the potential to fulfill, but we will continue to monitor the situation and see if an opportunity arises.
- 6.7 With regard to Option 3 relating to payment of a commuted sum, the applicant appreciates this is not the Council's preferred method of delivery and will therefore continue to pursue Options 1 and 2 until they and the Council agree that those options have been exhausted and a payment should be made.

## Appendix A

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**Market Research NW8 6BU**

28 Camden Road

1/2 mile radius

<b>1 bed flat</b>	<b>£</b>	<b>m2</b>	<b>£/m2</b>
The Pavilions Avenue Road, St John's Wood, London, NW8	925,000	63	14,683
Ormonde Terrace, St. John's Wood Conv	385,000	27	14,259
Shannon Place, St Johns Wood NW8 70s	510,000	46	11,087
Allitsen Road, St Johns Wood, NW8 Conv	550,000	44	12,500
Oslo Court, Prince Albert Road, Regents Park, NW8 7EN 70s	400,000	42	9,524
Oslo Court, Prince Albert Road, Regents Park, NW8 7EN 70s	575,000	43	13,372
Prince Albert Road, St John's Wood, London, NW8 70s	499,950	38	13,157
Finchley Road, St. John's Wood 30s	900,000	64	14,063
Finchley Road, London 70s mais	360,000	35	10,286
Finchley Road, London	485,000	41	11,829
Fellows Road, Belsize Park, NW3 Vic conv	530,000	44	12,045
Ainger Road, Primrose Hill Vic conv	630,000	40	15,750
Visage Apartments, Winchester Road, London, NW3	670,000	62	10,806
<b>Average</b>	<b>570,765</b>	<b>45</b>	<b>12,566</b>

<b>2 bed flat</b>	<b>£</b>	<b>m2</b>	<b>£/m2</b>
CRUICKSHANK HOUSE, NW8 6JY 70s	650,000	63	10,317
Cotman House, Townshend Estate, St John's Wood, NW8 70s	625,000	63	9,921
Eamont Court, Eamont Street, London, NW8 60s	650,000	58	11,207
Charlbert Court, Charlbert Street, London, NW8	625,000	56	11,161
St. Edmunds Terrace, London, NW8 60s	895,950	67	13,372
Elgood House, Wellington Road, NW8 70s	825,000	65	12,692
Athena Court, 2 Finchley Road, London, NW8 30s	1,050,000	109	9,633
Queens Grove Court, St Johns Wood, NW8 Vic conv	750,000	67	11,194
Blair Court, Boundary Road, London, NW8 70s	1,025,000	85	12,059
Melrose Apartments, Winchester Road, Swiss Cottage, NW3 mod	995,000	91	10,934
Langhorne Court, Dorman Way, London, NW8 70s	465,000	70	6,643
Fellows Road, Swiss Cottage, London, NW3 Vic conv	650,000	55	11,818
King Henrys Road, Primrose Hill, London, NW3 Edw	925,000	75	12,333
Oppidans Road, Primrose Hill, London, NW3	700,000	60	11,667
Ainger Road, Primrose Hill Edw	899,999	73	12,329
<b>Average</b>	<b>782,063</b>	<b>70</b>	<b>11,152</b>

<b>3 bed flat</b>	<b>£</b>	<b>m2</b>	<b>£/m2</b>
Lower Merton Rise, Primrose Hill	800,000	103	7,767
Finchley Road, St Johns Wood Vic	950,000	73	13,014
Barrow Hill Estate, St. John's Wood	699,950	68	10,293
Densham House, 9-25 Cochrane Street, St. John's Wood, London, NW8	830,000	88	9,432
Blair Court, Boundary Road, St John's Wood, NW8 70s	1,125,000	98	11,480
Avenue Road, St Johns Wood, NW8 70s	1,250,000	93	13,441
Adelaide Road, Swiss Cottage, London, NW3 30s	1,175,000	121	9,711
King Henrys Road, Belsize Park, London Vic conv	1,125,000	115	9,783
Townshend Court, Mackennal Street, London, NW8 30s	1,250,000	88	14,205
Eagle House, St John's Wood, NW8 Vic conv	1,215,000	105	11,571
<b>Average</b>	<b>920,495</b>	<b>95</b>	<b>11,070</b>

<b>Commercial properties for sale - 1 mile radius</b>	<b>£</b>	<b>sq ft</b>
Restaurant Belsize Park	450,000	
179-189 Finchley Road, London, NW3 6LB shop	192,250	8,363
Restaurant London, City of London, , NW1	129,950	
Hairdresser / Barber Shop for sale, Camden Town	100,000	
Offices Elizabeth Mews, Belsize Park	1,450,000	1,143
Retail Property (high street) Church Street, London, NW8	895,000	1,159
Hairdressers Englands Lane, Belsize Park	775,000	460
Hairdressers Church Street, London, NW8	650,000	576

Properties For Sale in NW8 6BU

rightmove.co.uk/property-for-sale/map.html?locationIdentifier=POSTCODE%5E623133&maxBedrooms=3&minBedrooms=1&numberOfPropertiesPerPage=...

NW8 6BU

+ 1/2 mile

Min Price to Max Price

1 Bed to 3 Bed

Property Type (1)

Filters

Exit map

Create Alert

Draw search

+

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Map data ©2020 Google Terms of Use

Bus routes st-john....pdf

Show all

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## Appendix B

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shops - Google Maps

google.co.uk/maps/search/shops/@51.5377018,-0.1702434,14.67z/data=!4m8!2m7!3m6!1sshops!2sAvenue+Road,+London+NW8+6BU!3s0x48761a95...

✓ Show route preview

Search this area

Blank London Ltd.

Co-op Food  
Grocery pitstop with discount products

Shepherd Foods

Primrose Hill

Avenue Road, London NW8 6BU

Gustavian

Jewish Museum London

Delancey St

Camden Town

Outer Cir

Albany St

Hampstead Rd

Ever-sholt St

Wellington Rd

Tiddlywinks@Ben's

Whisson News & Food London

Lord's Cricket Ground

Google

Map data ©2020 United Kingdom Terms Send feedback 200 m

Satellite

Paddington Recreation Ground

Carlton Vale

Carlton Hill

The Corner Shop

NS Food

Acacia Rd

Grove End Rd

Circus Rd

Hall Rd

Belsize Rd

Abbey Rd

B510

A5

Finchley Rd

Prince of Wales Rd

Kentish Town Rd

A503

A4

Bus routes st-john....pdf

Type here to search

Google

File Explorer

Shopping

Outlook

Excel

Spotify

Teams

Word

ENG

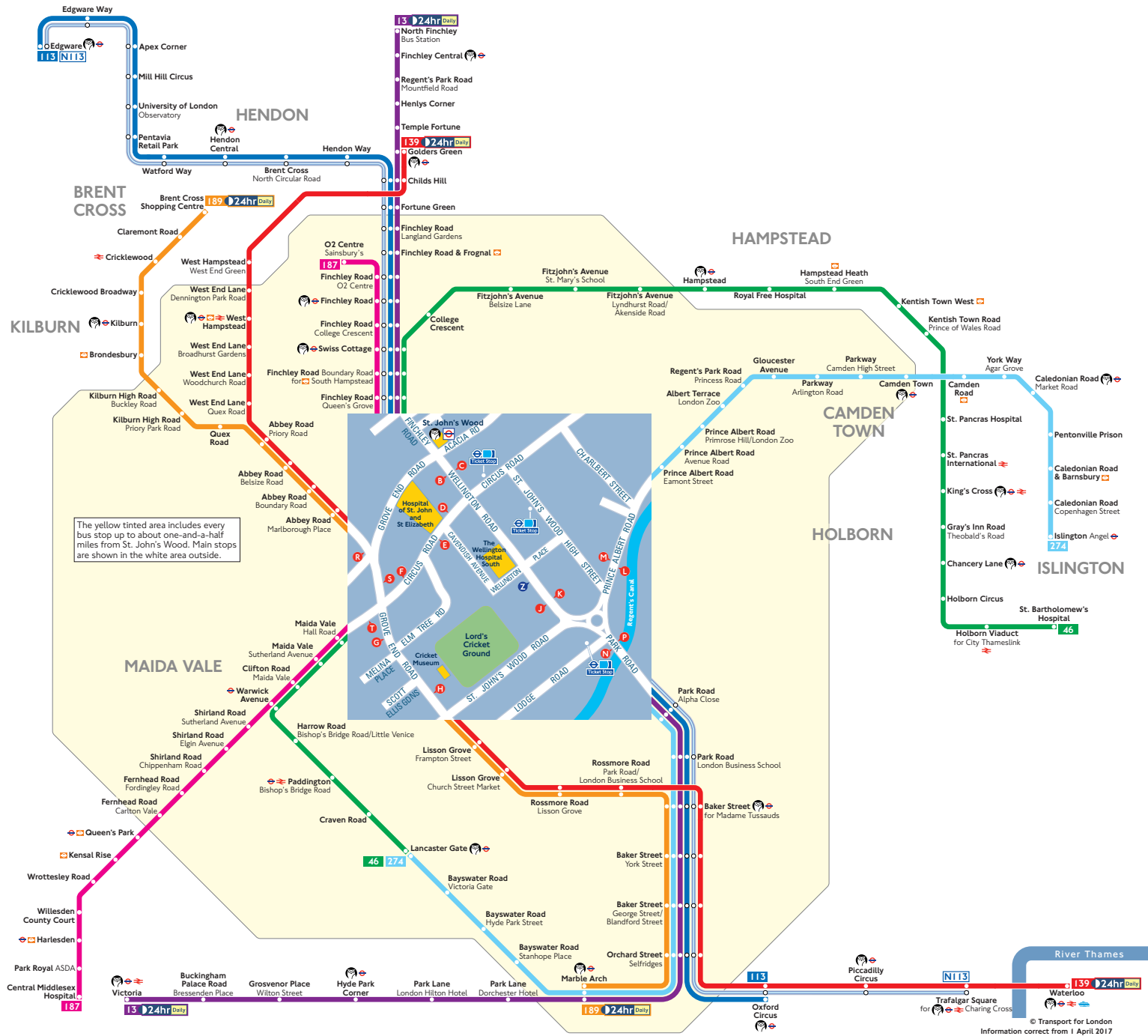
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## Appendix C

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Buses from St. John's Wood



Route finder

Bus route	Towards	Bus stops
13	North Finchley	B I N
	Victoria	G K P
46	Lancaster Gate	G E T
	St. Bartholomew's Hospital	B D F
113	Edgware	B I N
	Oxford Circus	G K P
139	Golders Green	G R
	Waterloo	H S
187	Central Middlesex Hospital	G E T
	Finchley Road	B D F
189	Brent Cross Shopping Centre	G R
	Marble Arch	H S
274	Islington	M N
	Lancaster Gate	L P

Night buses

Bus route	Towards	Bus stops
N113	Edgware	B I N
	Trafalgar Square	G K P

Coaches

Bus route	Towards	Coach stops
755	Luton	Z
757	Luton Airport/Luton	Z
758	Hemel Hempstead	Z
771	Linslade	Z
772	Linslade	Z
A1	Luton Airport	Z
A6	Stansted Airport	Z

Key

- 13 Day buses in black
- N113 Night buses in blue
- Connections with London Underground
- Connections with London Overground
- Connections with National Rail
- Connections with river boats
- Tube station with 24-hour service Friday and Saturday nights
- Mondays to Fridays only

Ways to pay

Use your contactless debit or credit card. It's the same fare as Oyster and there is no need to top up.

Top up your Oyster pay as you go credit or buy Travelcards and bus & tram passes at around 4,000 shops across London.

Sign up for an online account to top up online and see your travel history and spending.

## Appendix D

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## **Local Amenities – 28 Camden Road, St John's Wood NW8**

<b>Nearest Tube Station</b>	<b>Distance from site</b>
St John's Wood	0.5km

<b>Nearest GPs:</b>	<b>Distance from site</b>
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Swiss Cottage Surgery 2 Winchester Mews: Telephone: 020 7722 2772	0.6km
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Adelaide Medical Centre 111 Adelaide Road: Telephone: 020 7722 4135	0.7km
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Primrose Hill Surgery 99 Regent's Park Road: Telephone: 020 7722 0038	0.8km
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Daleham Gardens Health Centre 5 Daleham Gardens: Telephone: 0203 112 0800	1.1km
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The Abbey Medical Centre 85 Abbey Road: Telephone: 020 7604 2455	1.2km
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### **Nearest hospitals:**

Royal Free Hospital, Pond Street: Telephone: 020 7794 0500	1.7km
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BMI Fitzroy Square Hospital 13-14 Fitzroy Square: Telephone: 020 7388 4954	2.4km
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St Pancras Hospital 4 St Pancras Way: Telephone: 020 3317 3500	2.4km
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University College Hospital 235 Euston Road: Telephone: 020 3456 7890	2.5km
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University College Hospital Telephone: 0845 155 5000	
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UCL Mortimer Market Centre,

Mortimer Market: 2.7km  
Hospital For Tropical Diseases  
Telephone: 020 3456 7891

### **Nearest Leisure Centre**

Swiss Cottage Leisure Centre  
Winchester Road: 0.6km  
Telephone: 020 7974 2012

Talacre Community Sports Centre  
Dalby Street: 1.7km  
Telephone: 020 7974 8765.

Kentish Town Sports Centre  
Former Public Baths, Prince Of Wales Road: 1.9km  
Telephone: 020 7974 7000

UCS Activ

University College School, Frognal: 1.9km  
Telephone: 020 7433 2127

### **Community Centre**

[Swiss Cottage Community Centre](#)  
19 Winchester Road: 0.6km  
Telephone: 020 7586 5272

[Primrose Hill Community Centre](#)  
29 Hopkinson's Place: 0.8km  
Telephone: 020 7586 8327