



Our ref: AL/ar

14 June 2021

Ms E Woodall
Principal Planning
Planning Environment and Development Services
45 Welbeck Street
London W1G 8DZ

Dear Lizzie

28 AVENUE ROAD, CAMDEN – AFFORDABLE HOUSING DELIVERY

Thank you for copying us into the correspondence from LB Camden's planning department. As requested we have reviewed the email and would comment as follows in the same order as the planning officer has responded.

1.0 Affordable Housing Target

The fact that the target in terms of floor area needs to be rounded up to 1,230sqm based on 50% of the proposed floor area (2,460sqm) is accepted as is the reference to a site capacity of 25 units based on a rounding up of the floor area.

2.0 On-Site Options

We note that the Council are referencing the use of the Gate House as an affordable unit but having discussed this with the client it is not a suitable solution. It is currently occupied by the applicant, and will in due course be required by him for other purposes, and it is in any event too small to meet the needs of most households in need of affordable accommodation.

With regard to additional buildings on the site our understanding is that this would compromise the heritage setting of the site particularly in relation to the adjacent park whereby an open feel to the site is considered a key element of the setting. Therefore, we cannot see how the provision of 12-13 units on site would work in this context. Clearly this is a matter beyond just the affordable housing discussion, but we flag it up as a point that the Council have asked us to consider and we are sure you will add more technical detail to the response.

3.0 Off-Site Options

It is noted that the Council will seek an "enhanced offer" compared to what can be achieved on site. Bearing in mind the points made above I think this is something we will be able to demonstrate but the Council as they confirm will have to be realistic in reviewing this as either enhanced by quantity and/or quality. It is noted that in this regard the range for off-site provision will be judged between 1,230sqm and 2,460sqm.

It is also noted that the Council have set out their criteria for judging the off-site provision in terms of quantity, quality and location. It is noted that the location of off-site provision should be north of Euston Road with priority being given to the local ward in which the site is situated and then adjacent wards.

The Council have confirmed their requirement that should commercial conversion to residential use be anticipated then the upper limit of the floor area range (2,460sqm) would apply but if open market to affordable housing tenure conversions the lower limit of the floor area range (1,230sqm) would apply.

The Council further confirms that they will require that the affordable housing will be made available to eligible households via their approved RP partners. We cover this in more detail below.

With regard to site searches the client has advised that they have no sites available in their ownership which could be used to provide the affordable housing off-site. We will therefore be pursuing other options as detailed below.

3.1 Applicant's Option 1

We note that the Council state that Orchard and Shipman Homes are not on the Council's list of approved strategic partners. We can confirm that this is the case, but that O&S Homes are starting the process to become an approved partner of the Council. We will obviously monitor their progress and see if they are successful.

With regard to the off-site search list we put forward with our report at the time of the application, this list is clearly out of date, and we will be looking to carry out a continuous search during the currency of the application. Clearly one of the main issues for the client is that they will not wish to commit to the purchase of residential units unless and until planning consent is granted. So, we need to ensure the S.106 agreement has covenants in it for the client to be able to procure suitable residential units with the Council's agreement but delivering them up to the approved RP on or before occupation of the subject house. This is a matter that needs further discussion with the Council to achieve what both parties want.

The Council have helpfully confirmed that the purchase of 1,230sqm of existing open market units, particularly those previously sold under the "Right to Buy" scheme would "wholly meet the affordable housing target". Therefore, this method of fulfilment of the obligation is the priority, which we have agreed with the client.

3.2 Applicant's Option 2

We agree with the Council that the opportunities to fund additional affordable housing within an existing scheme being delivered by an approved RP or where they are working with a developer are limited and as such, we see this as purely a "fall-back" position should Option 1 above not come to fruition for any reason.

3.3 Payment in Lieu

We note the Council's comments about the calculation of the Commuted Sum and acknowledge the correct amount is £6,150,000. It is further acknowledged that a commuted sum would only become payable where all options for an off-site provision of affordable housing has been exhausted.

4.0 Conclusion

It is acknowledged that the on-site target is 1,230sqm but for the reasons stated at para 2 above this is highly unlikely to be achievable. The off-site target is noted to be between 1,230sqm and 2,460sqm and that the former will apply if conversion of open market residential units is achieved.

Any residential units acquired or developed to fulfil the obligation for delivery of affordable housing will have to be via the Council's approved RP partner list.

The Council would support delivery via Options 1 & 2 above if we adapt the proposals as they have set out and we have acknowledged. Option 1 is likely to be the most successful, and as such is now our priority in terms of identifying how the affordable housing will be delivered.

The payment in lieu of £6.15M would only be supported if all other options have been exhausted.

We believe we have a clear direction for the delivery of affordable housing for this scheme and look forward to discussing with the Council how this can be secured in the S.106 agreement.

Yours sincerely



A M LEAHY
Managing Director