

Camden Planning Guidance

# Design

London Borough of Camden

CPG **1**



September 2013



## CPG1 Design

1	Introduction .....	5
2	Design excellence .....	9
3	Heritage.....	15
4	Extensions, alterations and conservatories.....	25
5	Roofs, terraces and balconies.....	35
6	Landscape design and trees .....	45
7	Shopfronts.....	57
8	Advertisements, signs and hoardings .....	73
9	Designing safer environments.....	79
10	Waste and Recycling Storage.....	89
11	Building services equipment .....	99
12	Artworks, statues and memorials .....	103



# 1 Introduction

## What is Camden Planning Guidance?

- 1.1 We have prepared this Camden Planning Guidance to support the policies in our Local Development Framework (LDF). This guidance is therefore consistent with the Core Strategy and the Development Policies, and forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions. The Council formally adopted CPG1 – Design on 6 April 2011 following statutory consultation. This document was updated on 4 September 2013 following statutory consultation to include Section 12 on artworks, statues and memorials. The Camden Planning Guidance documents (CPG1 to CPG8) replace Camden Planning Guidance 2006.
- 1.2 The Camden Planning Guidance covers a range of topics (such as housing, sustainability, amenity and planning obligations) and so all of the sections should be read in conjunction, and within the context of Camden’s LDF.

## Design in Camden

- 1.3 Camden has many attractive and historic neighbourhoods as well as both traditional and modern buildings of the highest quality. These are a significant reason that the borough is such a popular place to live, work and visit. As well as conserving our rich heritage we should also contribute towards it by ensuring that we create equally high quality buildings and spaces which will be appreciated by future generations.
- 1.4 This objective of achieving high quality design does not just concern new development or large-scale schemes, but also includes the replacement, extension or conversion of existing buildings. The detailed guidance contained within this section therefore considers a range of design-related issues for both residential and commercial property and the spaces around them.



## What does this guidance cover?

1.5 This guidance provides information on all types of detailed design issues within the borough and includes the following sections:

1. Introduction
2. Design excellence
3. Heritage
4. Extensions, alterations and conservatories
5. Roofs, terraces and balconies
6. Landscape design and trees
7. Shopfronts
8. Advertisements, signs and hoardings
9. Designing safer environments
10. Waste recyclables storage
11. Building services equipment
12. Artworks, statues and memorials

1.6 This guidance supports the following Local Development Framework policies:

### **Core Strategy**

- CS14 Promoting high quality places and conserving our heritage
- CS15 Protecting and improving our parks and open spaces & encouraging biodiversity
- CS17 Making Camden a safer place
- CS18 Dealing with our waste and encouraging recycling

### **Development Policies**

- DP24 Securing high quality design
- DP25 Conserving Camden's heritage
- DP27 Basements and lightwells
- DP30 Shopfronts

1.7 It should be noted that the guidance covered in this section only forms part of the range of considerations that you should address when proposing new development. In addition to these specific design matters you should also consider wider issues such as cycle storage, residential space standards, wheelchair housing, designing in sustainability measures and impacts on neighbours. Further guidance on these, and other issues, is contained within the Local Development Framework documents and the Camden Planning Guidance.





## 2 Design excellence

### KEY MESSAGES

Camden is committed to excellence in design and schemes should consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use of the building;
- The materials used; and
- Public spaces.

- 2.1 High quality design makes a significant contribution to the success of a development and the community in which it is located. Design of the built environment affects many things about the way we use spaces and interact with each other, comfort and enjoyment, safety and security and our sense of inclusion.
- 2.2 The purpose of this guidance is to promote design excellence and to outline the ways in which you can achieve high quality design within your development.
- 2.3 This guidance primarily relates to Core Strategy Policy CS14 Promoting high quality places and conserving our heritage and Development Policies DP24 Securing high quality design.



### When does this apply?

- 2.4 This guidance applies equally to all development, whether new build, converted, refurbished, extended and altered development. However, the implications for a proposal will vary greatly depending on the nature of the site, the proposed use, the scale of development, its interaction with surrounding sites, and existing buildings and structures on the site.

- 2.5 Other sections in this Camden Planning Guidance (CPG) relate to specific types of developments and relevant design matters, for example advertisements, signs and hoardings, designing safer environments, extensions, alterations and conversions, heritage and shopfronts.

### **General guidance on design**

- 2.6 Camden is committed to excellence in design. The borough contains many special and unique places, many of which are protected by conservation area status. In accordance with draft London Plan policies 7.1–7.7, Core Strategy policy CS14 requires development schemes to improve the quality of buildings, landscaping and public spaces and we will not approve design which is inappropriate to its context or fails to improve the character of an area.
- 2.7 We are working with our partners to promote design excellence and improve public buildings, landscaping and the street environment. We have established the Camden Design Initiative which seeks to encourage involvement, awareness and understanding of good design and this is promoted through the bi-annual Camden Design Awards which acknowledge high quality and innovative design. We are also a promoter of the national Civic Trust Awards which are awarded to buildings judged to have made a positive cultural, social or economic contribution to the local community.
- 2.8 In order to achieve high quality design in the borough we require applicants to consider buildings in terms of context, height, accessibility, orientation, siting, detailing and materials. These issues apply to all aspects of the development, including buildings and other structures (e.g. substations, refuse or cycle storage), outdoor spaces, landscaping and access points and should be considered at an early stage in the design of a development, as these elements are often difficult to change in later stages.



## **Context**

### 2.9 Good design should:

- positively enhance the character, history, archaeology and nature of existing buildings on the site and other buildings immediately adjacent and in the surrounding area, and any strategic or local views. This is particularly important in conservation areas;
- respect, and be sensitive to, natural and physical features, both on and off the site. Features to be considered include, but are not limited to: slope and topography, vegetation, biodiversity, habitats, waterways and drainage, wind, sunlight and shade, and local pollutant sources. Movement of earth to, from and around the site should be minimised to prevent flood risk, land instability and unnecessary transport of aggregates, especially by road; and
- consider connectivity to, from, around and through the site for people using all modes of transport, including pedestrians, cyclists, wheelchair users, those with visual impairments, people with pushchairs, and motorised vehicles.

## **Building design**

### 2.10 Good design should:

- ensure buildings do not significantly overshadow existing/proposed outdoor spaces (especially designated open spaces), amenity areas or existing or approved renewable energy facilities (such as solar panels). For further information, refer to CPG3 Sustainability Renewable energy (A shadowing exercise may be required for tall buildings or where they are near open spaces);
- consider the extent to which developments may overlook the windows or private garden area of another dwelling;
- consider views, both local and London wide, and particularly where the site is within a recognised strategic viewing corridor (as shown on the policy Proposals Map);
- consider the degree of openness of an area and of open spaces, including gardens including views in and out of these spaces
- contributions to the character of certain parts of the borough;
- provide visual interest for onlookers, from all aspects and distances. This will involve attention to be given to both form and detail;
- consider opportunities for overlooking of the street and, where appropriate, provide windows, doors and other 'active' features at ground floor; and
- incorporate external facilities such as renewable energy installations, access ramps, plant and machinery, waste storage facilities and shading devices into the design of the development. Careful consideration must be given to ensure that the facility does not harm the built environment.

### **Land use**

- 2.11 The use of a building should:
- take into account the proposed use, and the needs of the expected occupants of the buildings and other users of the site and development; and
  - provide clear indication of the use of the building. It is noted, however, that reuse of existing buildings, as well as the accommodation of possible future changes of use, can make this difficult.

### **Materials**

- 2.12 Materials should form an integral part of the design process and should relate to the character and appearance of the area, particularly in conservation areas or within the setting of listed buildings. The durability of materials and understanding of how they will weather should be taken into consideration. The quality of a well designed building can be easily reduced by the use of poor quality or an unsympathetic palette of materials. We will encourage re-used and recycled materials, and further guidance is contained within CPG3 Sustainability (Sustainable use of materials).

### **Tall buildings**

- 2.13 Tall buildings in Camden (i.e. those which are substantially taller than their neighbours and/or which significantly change the skyline) will be assessed against a range of design issues, including:
- how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape, and how the top of a tall building affects the skyline;
  - the contribution a building makes to pedestrian permeability and improved public accessibility;
  - the relationship between the building and hills and views;
  - the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
  - the historic context of the building's surroundings.
- 2.14 In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability. Reference should be made to this CPG (Heritage chapter), CPG3 Sustainability (Climate change adaptation chapter) and CPG6 Protecting and improving quality of life (Overlooking and privacy and Wind/microclimate chapters).
- 2.15 Where a proposal includes a development that creates a landmark or visual statement, particular care must be taken to ensure that the location is appropriate (such as a particular destination within a townscape, or a particular functional node) and that the development is sensitive to its wider context. This will be especially important where the

development is likely to impact upon heritage assets and their settings (including protected views).

- 2.16 Design should consider safety and access. Guidance on these issues is contained within this CPG (Designing safer environments chapter) and CPG4 Protecting and improving quality of life (Access for all chapter). Schemes over 90m should be referred to the Civil Aviation Authority.

### **Design of public space**

- 2.17 The design of public spaces, and the materials used, is very important. The size, layout and materials used in the spaces around buildings will influence how people use them, and help to create spaces that are welcoming, attractive, safe and useful. They can also contribute to other objectives such as reducing the impact of climate change (e.g. the use of trees and planters to reduce run-off and provide shading), biodiversity, local food production and Sustainable Urban Drainage Systems (SUDs), and provide useful amenity space. In Conservation Areas there may be particular traditional approaches to landscaping/boundary treatments that should be respected in new designs.
- 2.18 The spaces around new developments should be considered at the same time as the developments themselves and hard / soft landscaping and boundary treatments should be considered as part of wider cohesive design. The landscaping and trees chapter in this CPG, and individual Conservation Area Appraisals, provide further guidance on this issue.
- 2.19 Public art can be a catalyst for improved environmental quality by upgrading and animating public space and enhancing local character and identity through helping create a sense of place. The Council will therefore encourage the provision of art and decorative features as an integral part of public spaces, where they are appropriate to their location and enhance the character and environment.
- 2.20 It is important that public spaces and streets are maintained to a high standard and so, in line with the Local Implementation Plan, the Council will continue to undertake public space enhancement works through specifically targeted programmes. The Designing safer environments chapter in this CPG provides more detailed guidance on the incorporation of safety and security considerations in public spaces.

### **Design and access statements**

- 2.21 Design and Access Statements are documents that explain the design ideas and rationale behind a scheme. They should show that you have thought carefully about how everyone, including disabled people, older people and children, will be able to use the places you want to build.
- 2.22 Design and Access Statements should include a written description and justification of the planning application and sometimes photos, maps and drawings may be useful to further illustrate the points made. The length and detail of a Design and Access Statement should be related to the

related to the size and complexity of the scheme. A statement for a major development is likely to be much longer than one for a small scheme.

- 2.23 Design and Access Statements are required to accompany all planning, conservation and listed building applications, except in certain circumstances as set out on our website [www.camden.gov.uk/planning](http://www.camden.gov.uk/planning). Our website also provides a template for Design and Access Statements and lists the information that each statement should contain. Further guidance on Access Statements is provided in CPG4 Protecting and improving quality of life (Access for all chapter).

### Further information

General	By Design: Urban Design in the Planning System – Towards Better Practice, DETR/CABE, 2000 Design and Access Statements; how to read, write and use them, CABE, 2007
Tall Buildings	Guidance on tall buildings, English Heritage/CABE, 2007
Historic Environment	Understanding Place, English Heritage 2010; and Building in Context, English Heritage/CABE, 2002.
Other	Royal Institute of Chartered Surveyors (RICS); and Royal Institute of British Architects (RIBA).

## 3 Heritage

### KEY MESSAGES

Camden has a rich architectural heritage and we have a responsibility to preserve, and where possible, enhance these areas and buildings.

- We will only permit development within conservation areas that preserves and enhances the character and appearance of the area
- Our conservation area statements, appraisals and management plans contain more information on all the conservation areas
- Most works to alter a listed building are likely to require listed building consent
- Historic buildings can and should address sustainability

3.1 This section provides guidance on our identified heritage assets (which include conservation areas, listed buildings and registered parks and gardens), including what they are and the implications of their status and designation. This section also sets out details on how historic buildings can address sustainability.

3.2 This section sets out further guidance on how we will apply Core Strategy Policy CS14 Promoting high quality places and conserving our heritage and Development Policy DP25 Conserving Camden's Heritage.

### When does this apply?

3.3 This guidance applies to all applications which may affect any element of the historic environment and therefore may require planning permission, or conservation area or listed building consent.



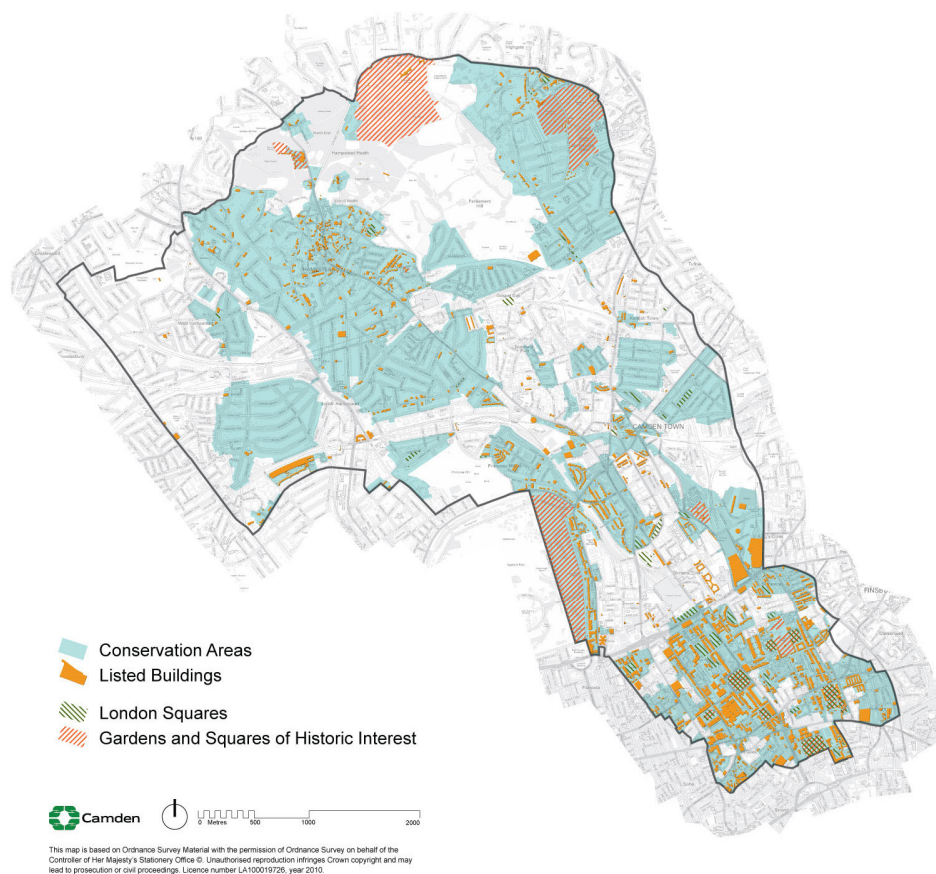
### Conservation Areas

#### What is a conservation area?

3.4 A conservation area is defined in the Planning (Listed Buildings and Conservation Areas) Act 1990 as an area of special architectural or

historic interest, the character or appearance of which it is desirable to preserve and, where possible, enhance. PPS5 identifies conservation areas as “heritage assets” and requires that proposals in conservation areas are assessed for their impacts on their historic significance. There are 39 conservation areas in Camden, which vary greatly in appearance, size, character and style and these are identified on the LDF Proposals Map.

Figure 1. Conservation Areas



- 3.5 Conservation area designation is a way to recognise the importance of the quality of an area as a whole, as well as giving some protection to individual buildings within it. Conservation areas are not designated to stop all future development or change but to ensure that change is managed to conserve the historic significance of the area as a whole.
- 3.6 Conservation area designation is shown on the proposals map and further information on heritage is available on the ‘Conservation and Design’ section of the Council’s website [www.camden.gov.uk](http://www.camden.gov.uk) and on English Heritage’s website [www.english-heritage.org.uk](http://www.english-heritage.org.uk).



### Effects of conservation area status

- 3.7 We will only permit development within conservation areas, and development affecting the setting of conservation areas, that preserves and enhances the character and appearance of the area (see Planning Policy Statement 5 (PPS5), policy HE8).
- 3.8 The Council has greater control over building work in conservation areas, including demolition, materials and detailed design. Planning permission may be required for alterations or extensions that would not normally need planning permission elsewhere, such as minor roof alterations, dormer windows, renewable energy installations or installation of a satellite dish.

#### Renewable energy technology

Renewable energy technologies generate energy from natural resources such as sunlight, wind, rain and heat in the ground, which are naturally replenished.

### Demolition in conservation areas

- 3.9 Conservation Area Consent is required to demolish or substantially demolish a building over 115 cubic metres or a structure such as a wall over 1 metre high that adjoins a highway, or more than 2 metres high elsewhere. When determining your application we will follow the guidance in PPS5, Core Strategy policy CS14 and Development Policy DP24 as well as that in our conservation area statements, appraisals and management plans (see below). It is an offence to totally or substantially demolish a building or structure in a conservation area without first getting consent from us and we would not normally allow their demolition without substantial justification, in accordance with criteria set out in government guidance PPS5 – Planning for the Historic Environment.

### Trees

- 3.10 Planning legislation makes special provision for trees in conservation areas. Prior to pruning or felling a tree in a conservation area you must provide the Council six weeks notice in writing. All trees that contribute to the character and appearance of a conservation area should be retained and protected. For further information on trees, please see Landscape Design and Trees chapter in this CPG.



### **Article 4 directions**

- 3.11 A range of minor changes can be made to buildings without the need to apply for planning permission as these have a general permission through planning legislation. These changes are known as permitted development. However, the character of a conservation area depends on the presence of specific original details and where these are lost the historic interest and attractive character of the area deteriorates.
- 3.12 In these situations we can issue an Article 4 direction through Article 4 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended). This removes permitted development rights and means a planning application has to be made for minor works that usually do not need one.
- 3.13 Further information on Article 4 directions, including where they apply in Camden is available on the 'Advice and help with planning applications' section of the Council's website [www.camden.gov.uk](http://www.camden.gov.uk) and English Heritage has published Guidance on making Article 4 Directions, available at [www.english-heritage.org.uk/publications/guidance-on-making-article-4-directions/](http://www.english-heritage.org.uk/publications/guidance-on-making-article-4-directions/)

### **Conservation area statements, appraisals and management plans**

- 3.14 We have published a series of conservation area statements, appraisals and management plans that set out our approach to preserving and enhancing the historic significance of each individual conservation area. Many of these conservation area statements are available for download on our website.
- 3.15 Conservation area statements, appraisals and management plans help guide the design of development in conservation areas and we take these into account when assessing planning applications.
- 3.16 Each conservation area statement, appraisal or management plan contains the following:
- A summary of the location and the historical development of an area;
  - A description of its character;

- An outline of the key issues and development pressures that are currently of concern;
- The key policy framework for that particular conservation area, and specific guidance for it;
- An identification of heritage assets and elements of the wider historic environment which give an area its historic significance; and
- An identification of sites and features that have a negative impact on the conservation area, or where an opportunity exists for enhancement of the area by redevelopment of a building or site.



## Listed Buildings

### What is a listed building?

- 3.17 A listed building is defined in the Planning (Listed Buildings and Conservation Areas) Act 1990 as a structure or building of special architectural or historic interest. These are included on the Statutory List of Buildings of Architectural or Historic Interest managed by English Heritage. Listed buildings are identified as heritage assets within the LDF and the Council is required to assess the impact that proposals to a listed building, or within their setting, may have on the historic significance of the building.
- 3.18 Listed buildings are graded according to their relative importance as either Grade I, Grade II\* or Grade II. Grades I and II\* are considered of outstanding architectural or historic interest and are of particularly great importance to the nation's heritage. The majority of listed buildings (about 94% nationally) are Grade II. However, the statutory controls on alterations apply equally to all listed buildings irrespective of their grade and cover the interior as well as the exterior and any object or structure fixed to or within their curtilage.

**Listing description**

The listing description contains details of a listed building's address, history, appearance and significance. These help to identify what it is about the building that gives it its special historic interest.

- 3.19 Further information on listed buildings in Camden is available on our website [www.camden.gov.uk](http://www.camden.gov.uk)

**How can I alter a listed building?**

- 3.20 Most works to alter a listed building are likely to require listed building consent and this is assessed on a case by case basis, taking into account the individual features of a building, its historic significance and the cumulative impact of small alterations. The listing description is not intended to be exhaustive and the absence of any particular feature in the description does not imply that it is not of significance, or that it can be removed or altered without consent. Listed status also extends to any object or structure fixed to the listed building, and any object or structure within its curtilage which forms part of the land. You should contact the Council at the earliest opportunity to discuss proposals and to establish whether listed building consent is required.
- 3.21 Some 'like for like' repairs and maintenance do not require listed building consent. However, where these would involve the removal of historic materials or architectural features, or would have an impact on the special architectural or historic interest of the building, consent will be required. If in doubt applicants should contact the Council for advice.
- 3.22 In assessing applications for listed building consent we have a statutory requirement to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. We will consider the impact of proposals on the historic significance of the building, including its features, such as:
- original and historic materials and architectural features;
  - original layout of rooms;
  - structural integrity; and
  - character and appearance.
- 3.23 We will expect original or historic features to be retained and repairs to be in matching material. Proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them.
- 3.24 Applications for listed building consent should be fully justified and should demonstrate how proposals would affect the significance of a listed building and why the works or changes are desirable or necessary. In addition to listed building consent, some proposals may also require planning permission. These applications should be submitted together and will be assessed concurrently.

- 3.25 It is a criminal offence to undertake unauthorised works to a listed building, even if you are not aware the building is listed, and could result in prosecution and fine or imprisonment (or both).
- 3.26 Some works that are required in order to comply with the Building Regulations (e.g. inclusive access, energy efficiency) may have an impact on the historic significance of a listed building and will require listed building consent.

### **Inclusive access to listed buildings**

- 3.27 It is important that everyone should have dignified and easy access to and within historic buildings, regardless of their level of mobility. With sensitive design, listed buildings can be made more accessible, while still preserving and enhancing the character of the building.
- 3.28 Further guidance is available in CPG4 Protecting and improving quality of life (Access for all chapter) and in the English Heritage publication “Easy Access to Historic Buildings” [www.english-heritage.org.uk](http://www.english-heritage.org.uk)



### **How can historic buildings address sustainability?**

- 3.29 We recognise the role that the historic environment can play in reducing the impact of climate change. For example, reusing existing buildings could avoid the material and energy cost of new development. There are many ways to improve the efficiency and environmental impact of historic buildings, for example improving insulation, draught-proofing and integrating new energy-saving and renewable-energy technologies. We will seek to balance achieving higher environmental standards with protecting Camden's unique built environment (in accordance with LDF Core Strategy policies CS13 Tackling climate change through promoting higher environmental standards and CS14 Promoting high quality places and conserving our heritage) and PPS5 policy HE.1.

- 3.30 More detailed guidance on how to modify buildings without compromising their significance is contained within CPG3 Sustainability (Energy efficiency: new buildings, Energy efficiency: existing buildings, Renewable energy, Climate change adaptation, Water efficiency, Flooding and Sustainable use of materials). For further information see the links at the end of this chapter.

### **Planning obligations relating to heritage assets**

- 3.31 Many of the potential impacts of development on historic buildings and in archaeological priority and conservation areas can be covered through design and by conditions on the planning permission, for example the need to carry out surveys or the storage and restoration of artefacts. Some objectives for building and area conservation or archaeology are unlikely to be satisfactorily controlled by a condition or in such cases and where impacts are off-site, or involve a particularly sensitive or complex programme of works, involving phasing, the Council may require implementation of these measures through a Section 106 Agreement.

### Further information

<p>Planning Policy Statement 5 (PPS5)</p>	<p>The Government's national policies on the historic environment are set out in:</p> <ul style="list-style-type: none"> <li>• Planning Policy Statement (PPS) 5 Planning for the historic environment – CLG, 2010</li> </ul> <p>If you want guidance implement this national policy, it is provided in:</p> <ul style="list-style-type: none"> <li>• PPS5, Planning for the Historic Environment, The Government's Statement on the Historic Environment for England, and The Historic Environment Planning Practice Guide</li> </ul>
<p>English Heritage</p>	<p><a href="http://www.englishheritage.org.uk">www.englishheritage.org.uk</a></p> <p>Guidance on heritage assets:</p> <ul style="list-style-type: none"> <li>• Guidance on Conservation Area Appraisals, 2006 – English Heritage;</li> <li>• Guidance on Management of Conservation Areas, 2006 – English Heritage;</li> <li>• Climate Change and the Historic Environment (2008); and</li> <li>• Heritage at Risk Register - English Heritage <a href="http://risk.english-heritage.org.uk/2010.aspx">http://risk.english-heritage.org.uk/2010.aspx</a></li> </ul> <p>Guidance on sustainability measures in heritage buildings:</p> <ul style="list-style-type: none"> <li>• Energy Conservation in Traditional Buildings</li> <li>• Climate Change and the Historic Environment</li> </ul> <p>There is also an online resource dedicated to climate change and the historic environment, available at:</p> <ul style="list-style-type: none"> <li>• <a href="http://www.englishheritage.org.uk/climatechangeandyourhome">www.englishheritage.org.uk/climatechangeandyourhome</a></li> </ul>
<p>Energy Saving Trust</p>	<p><a href="http://www.est.org.uk">www.est.org.uk</a></p>





## 5 Roofs, terraces and balconies

### KEY MESSAGES

Roof extensions fall into two categories:

- Alterations to the overall roof form; or
- Smaller alterations within the existing roof form, such as balconies and terraces.

When proposing roof alterations and extensions, the main considerations should be:

- The scale and visual prominence;
- The effect on the established townscape and architectural style;
- The effect on neighbouring properties

- 5.1 This guidance provides advice on roof alterations and extensions and on proposals for balconies and terraces. The Council will seek to ensure that roof alterations are sympathetic and do not harm the character and appearance of buildings or the wider townscape in the borough.
- 5.2 This guidance replates primarily to Development Policies DP24 Securing high quality design and DP25 Conserving Camden's Heritage.

### When does this apply?

- 5.3 This guidance applies to all planning applications involving roof alterations, roof extensions, balconies and terraces, and is particularly relevant to residential properties.
- 5.4 For properties in conservation areas, reference should also be made to the relevant conservation area statements, appraisals and management plans. These describe the area and its special character and contain specific area-based advice.
- 5.5 Where buildings are listed, reference should also be made to planning guidance on Heritage.

### Roof alterations and extensions – general principles

- 5.6 Proposals to alter and extend roofs fall into two categories: those that are accommodated within the existing roof form, such as dormer windows and roof lights, and those which alter the overall roof form, such as the construction of mansard roofs.
- 5.7 Additional storeys and roof alterations are likely to be **acceptable** where:
- There is an established form of roof addition or alteration to a terrace or group of similar buildings and where continuing the pattern of development would help to re-unite a group of buildings and townscape;

- Alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form;
- There are a variety of additions or alterations to roofs which create an established pattern and where further development of a similar form would not cause additional harm.

5.8 A roof alteration or addition is likely to be **unacceptable** in the following circumstances where there is likely to be an adverse affect on the skyline, the appearance of the building or the surrounding street scene:

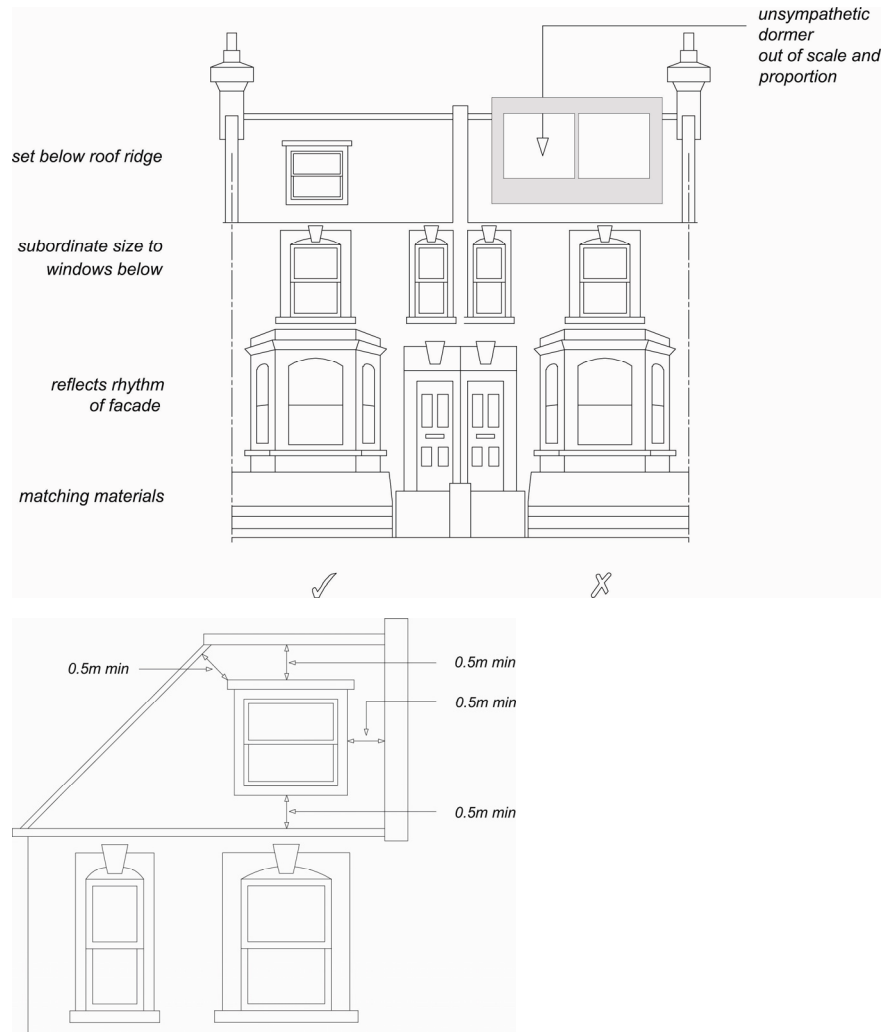
- There is an unbroken run of valley roofs;
- Complete terraces or groups of buildings have a roof line that is largely unimpaired by alterations or extensions, even when a proposal involves adding to the whole terrace or group as a co-ordinated design;
- Buildings or terraces which already have an additional storey or mansard;
- Buildings already higher than neighbouring properties where an additional storey would add significantly to the bulk or unbalance the architectural composition;
- Buildings or terraces which have a roof line that is exposed to important London-wide and local views from public spaces;
- Buildings whose roof construction or form are unsuitable for roof additions such as shallow pitched roofs with eaves;
- The building is designed as a complete composition where its architectural style would be undermined by any addition at roof level;
- Buildings are part of a group where differing heights add visual interest and where a roof extension would detract from this variety of form;
- Where the scale and proportions of the building would be overwhelmed by additional extension.

5.9 Materials, such as clay tiles, slate, lead or copper, that visually blend with existing materials, are preferred for roof alterations and repairs. Where roofs are being refurbished, original materials such as keyhole ridge tiles or decorative chimney stacks and chimney pots should be reused. Replacement by inappropriate substitutes erodes the character and appearance of buildings and areas.

5.10 Where the principle of an additional storey is acceptable, the more specific guidance set out below will apply. This advice is supplemented by more specific area-based advice as set out in the Council's conservation area statements, appraisals and management plans which set out our approach to preserving and enhancing such areas. Many of these appraisals and management plans are available for download on our website, or are available as hard copies from our Planning reception.

## Roof dormers

- 5.11 Alterations to, or the addition of, roof dormers should be sensitive changes which maintain the overall structure of the existing roof form. Proposals that achieve this will be generally considered acceptable, providing that the following circumstances are met:
- a) The pitch of the existing roof is sufficient to allow adequate habitable space without the creation of disproportionately large dormers or raising the roof ridge. Dormers should not be introduced to shallow-pitched roofs.
  - b) Dormers should not be introduced where they cut through the roof ridge or the sloped edge of a hipped roof. They should also be sufficiently below the ridge of the roof in order to avoid projecting into the roofline when viewed from a distance. Usually a 500mm gap is required between the dormer and the ridge or hip to maintain this separation (see Figure 4). Full-length dormers, on both the front and rear of the property, will be discouraged to minimise the prominence of these structures.
  - c) Dormers should not be introduced where they interrupt an unbroken roofscape.
  - d) In number, form, scale and pane size, the dormer and window should relate to the façade below and the surface area of the roof. They should appear as separate small projections on the roof surface. They should generally be aligned with windows on the lower floors and be of a size that is clearly subordinate to the windows below. In some very narrow frontage houses, a single dormer placed centrally may be preferable (see Figure 4). It is important to ensure the dormer sides (“cheeks”) are no wider than the structure requires as this can give an overly dominant appearance. Deep fascias and eaves gutters should be avoided.
  - e) Where buildings have a parapet the lower edge of the dormer should be located below the parapet line (see Figure 4).
  - f) Materials should complement the main building and the wider townscape and the use of traditional materials such as timber, lead and hanging tiles are preferred.

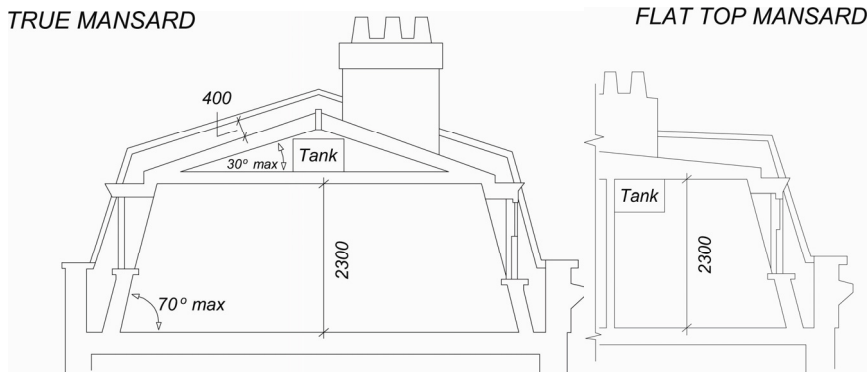
**Figure 4. Dormer windows**

5.12 See CPG2 Housing (Residential development standards chapter) for further information, particularly the section on ceiling heights.

5.13 The presence of unsuitably designed new or altered dormers on neighbouring properties will not serve as a precedent for further development of the same kind.

### **Mansard Roofs**

5.14 Mansard roofs are a traditional means of terminating a building without adding a highly visible roof. This form is acceptable where it is the established roof form in a group of buildings or townscape.

**Figure 5. Mansard Roofs****True Mansard**

Lower slope is at a steeper angle than the upper, and the upper slope is visible

**Flat topped Mansard**

Upper slope of a pitch below 5° or totally flat

- 5.15 Mansard roofs are often the most appropriate form of extension for a Georgian or Victorian dwelling with a raised parapet wall and low roof structure behind. Mansard roofs should not exceed the height stated in Figure 5 so as to avoid excessive additional height to the host building. They are often a historically appropriate solution for traditional townscapes. It should be noted that other forms of roof extensions may also be appropriate in situations where there is a strong continuous parapet and the extension is sufficiently set back or where they would match other existing sympathetic roof extension already in the terrace.

**Parapet wall**

A low wall or railing that is built along the edge of a roof, balcony or terrace for protection purposes.

**Cornice**

The topmost architectural element of a building, projecting forward from the main walls, originally used as a means of directing rainwater away from the building's walls.

- 5.16 The three main aspects to consider when designing a mansard roof extension are its:
- pitches and profile;
  - external covering; and
  - windows.
- 5.17 The lower slope (usually 60-70°) should rise from behind and not on top of the parapet wall, separated from the wall by a substantial gutter. Original cornice, parapet and railing details should be retained and where deteriorated or lost, should be incorporated into the design of new roof extensions. Visible chimney stacks should be retained and increased in height, where necessary. Only party walls with their chimney stacks and windows should break the plane of the roof slope, and should be accommodated in a sensitive way and be hidden as far

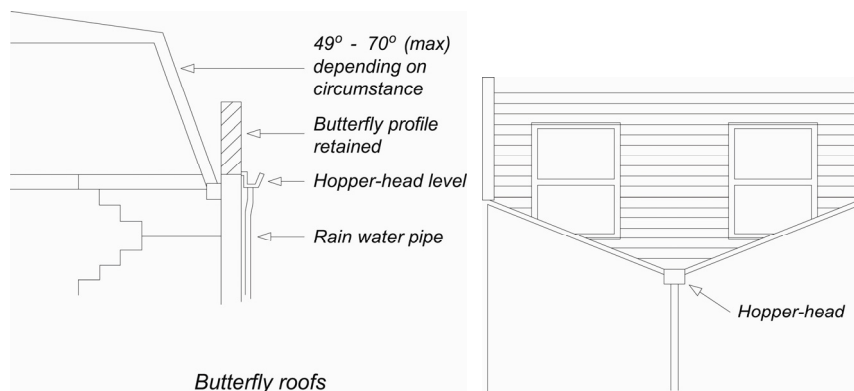
as is possible. (See also guidance on dormer windows and roof lights). Dormer windows or roof lights should be confined to the lower slope.

- 5.18 Roofing materials should be of the highest quality because of their significant visual impact on the appearance of a building and townscape and the need to be weather-tight. Natural slate is the most common covering and this should be laid with a traditional overlap pattern. Artificial slate or felt are not acceptable roof coverings in conservation areas. Where a roof in a conservation area is being re-covered, the choice of covering should replicate the original, usually natural slate or clay tile.

### Valley or Butterfly roofs

- 5.19 On buildings with a 'valley' or 'butterfly' roof if a mansard extension is considered acceptable in terms of the guidance in paragraphs 5.7 and 5.8 of this chapter, then the parapet should be retained. The new roof should start from behind the parapet at existing hopper-head level, forming a continuous slope of up to a maximum of 70° (see Figure 6). In this context, it is usually more appropriate to introduce conservation-style roof lights, which are flush with the roof slope, rather than dormers. Terraces and additional railings will not usually be acceptable.

**Figure 6. Butterfly roofs**



#### **Hopper head level**

The level at which the 'hopper head' (a square or funnel shaped receptacle to connect rainwater or waste pipes to a down-pipe) is positioned.

### Other roof additions

- 5.20 On some contemporary buildings a less traditional form of roof addition may be more appropriate. In such cases, proposals should still have regard for the following general principles:
- The visual prominence, scale and bulk of the extension;
  - Use of high quality materials and details;

- Impact on adjoining properties both in terms of bulk and design and amenity of neighbours, e.g. loss of light due to additional height;
- Sympathetic design and relationship to the main building.

### **Roof lights**

- 5.21 Roof lights can have an adverse impact upon the character and appearance of buildings and streetscapes. This occurs where they are raised above the roof slope rather than being flush with the roof profile, or where they are an incompatible introduction into an otherwise uncluttered roofscape, or where they conflict with other architectural roof elements, e.g. gables and turrets.
- 5.22 Roof lights should be proportioned to be significantly subordinate both in size and number and should be fitted flush with the roof surface. Some properties, particularly listed buildings and those within conservation areas with prominent roof slopes may be so sensitive to changes that even the installation of roof lights may not be acceptable.

### **Balconies and terraces**

- 5.23 Balconies and terraces can provide valuable amenity space for flats that would otherwise have little or no private exterior space. However, they can also cause nuisance to neighbours. Potential problems include overlooking and privacy, daylight, noise, light spillage and security.
- 5.24 Balconies and terraces should form an integral element in the design of elevations. The key to whether a design is acceptable is the degree to which the balcony or terrace complements the elevation upon which it is to be located. Consideration should therefore be given to the following:
- detailed design to reduce the impact on the existing elevation;
  - careful choice of materials and colour to match the existing elevation;
  - possible use of setbacks to minimise overlooking – a balcony need not necessarily cover the entire available roof space;
  - possible use of screens or planting to prevent overlooking of habitable rooms or nearby gardens, without reducing daylight and sunlight or outlook; and
  - need to avoid creating climbing opportunities for burglars.

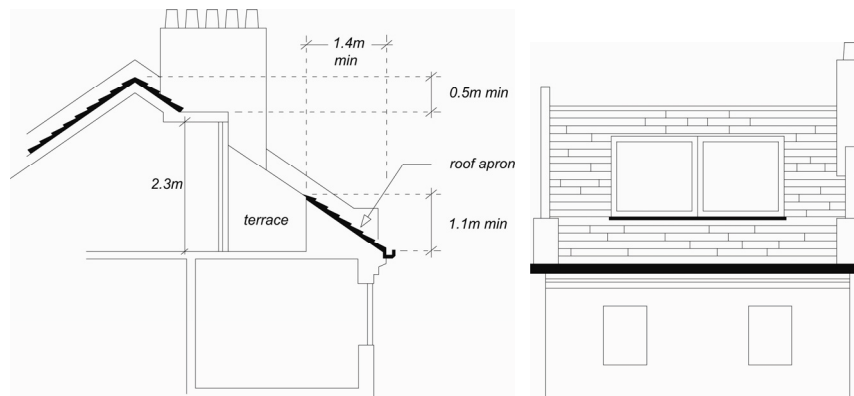
### **Roof Level**

- 5.25 A terrace provided at roof level should be set back behind the slope of a pitched roof in accordance with Figure 7, or behind a parapet on a flat roof. A terrace should normally comply with the following criteria:
- The dimensions of the roof should be sufficient to accommodate a terrace without adversely affecting the appearance of the roof or the elevation of the property.
  - A terrace will only normally be acceptable on the rear of properties. It is normally inappropriate to set back a mansard to provide a terrace.

- It should not result in the parapet height being altered, or, in the case of valley/butterfly roofs, the infilling of the rear valley parapet by brickwork or railings.
- Any handrails required should be well set back behind the line of the roof slope, and be invisible from the ground.
- It should not result in overlooking of habitable rooms of adjacent properties.

- 5.26 When a terrace is provided within the slope of a pitch as in Figure 7, the adjacent tiles or slates should be kept unbroken above the eaves. The width of the terrace should be no wider than a dormer opening. A terrace may be acceptable behind an existing parapet. Where the height of the parapet is less than 1.1m, a railing will be required to fulfil Building Regulations.

**Figure 7. Roof terraces**



### **Building services equipment**

- 5.27 New building services equipment and water tanks should be accommodated within the envelope of the building and its siting should be considered as part of the overall design (see chapter on Building services equipment in this CPG). Building services equipment includes, but is not limited to, heating and cooling systems, ventilation and extraction systems and associated ducting for electricity, communications and plumbing.

### **Green roofs**

- 5.28 We encourage the incorporation of green roofs into schemes where appropriate in design terms (see chapter on Green roofs and walls in CPG3 Sustainability). You should contact the Council to confirm whether planning permission is required for green roofs. Planning permission is not required on flat roofs which are concealed by a parapet.

### **Solar panels**

- 5.29 We encourage the installation of solar panels into schemes and for some properties these will not need planning permission. You should



contact the Council and visit the Planning Portal website [www.planningportal.gov.uk](http://www.planningportal.gov.uk) to confirm whether planning permission is required for solar panels. Solar panels should be sited so as to maximise efficiency but minimise their visual impact and glare, for example utilising valley roofs and concealed roof slopes. Reference should be made to CPG3 Sustainability (Energy Efficiency: existing buildings and Energy Efficiency: new buildings chapters).



Camden Planning Guidance

# Housing

London Borough of Camden

CPG 2



September 2013



## CPG2 Housing

1	Introduction .....	5
2	Affordable housing and housing in mixed use development....	7
3	Student Housing.....	41
4	Residential development standards .....	53
5	Lifetime Homes and Wheelchair Housing .....	63
6	Development involving net loss of homes .....	75



# 1 Introduction

## What is Camden Planning Guidance?

- 1.1 We have prepared this Camden Planning Guidance (CPG) to support the policies in our Local Development Framework (LDF). This guidance is therefore consistent with the Core Strategy and the Development Policies, and forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions. The Council formally adopted CPG2 Housing on 6 April 2011 following statutory consultation. The Camden Planning Guidance documents (CPG1 to CPG8) replace Camden Planning Guidance 2006.
- 1.2 This document (CPG2 Housing) was updated on 4 September 2013 following statutory consultation in November to December 2012. The Council has also consulted on other amendments to CPG2 relating to "affordable rent", which have not yet been adopted or withdrawn, and will be considered when the Mayor of London has determined how early alterations to the London Plan will be taken forward. These changes are included in appendix (i) to this document for information, with proposed additions underlined and proposed deletions ~~struck through~~ (see page 79).
- 1.3 The Camden Planning Guidance covers a range of topics (such as design, sustainability, amenity and planning obligations) and so all of the sections should be read in conjunction, and within the context of Camden’s LDF.

## Housing in Camden

- 1.4 A key priority for the Council is to ensure that everyone has the opportunity to live in a decent home at a price they can afford in a community where they want to live. Camden is a very popular place to live, which means that average house prices are high and that the demand for affordable housing far outstrips supply.
- 1.5 The Local Development Framework seeks to make full use of Camden’s capacity for housing to establish a plentiful supply and broad range of homes. In addition to meeting or exceeding Camden’s housing targets, the Local Development Framework seeks to ensure that new homes are built to a high standard and provide well-designed accommodation that meets the needs of a range of occupiers.

**What does this guidance cover?**

- 1.6 This guidance provides information on all types of housing development within the borough. It provides specific guidance on:
- Affordable housing
  - Student housing
  - Residential Space standards
  - Lifetime homes and wheelchair housing
  - Development involving net loss of homes
- 1.7 It highlights the Council's requirements and guidelines which support the Local Development Framework policies:
- CS1 – Distribution of growth
  - CS5 – Managing the impact of growth and development
  - CS6 – Providing quality homes
  - CS14 – Promoting high quality places and conserving our heritage
  - DP1 – Mixed use development
  - DP2 – Making full use of Camden's capacity for housing
  - DP3 – Contributions to the supply of affordable housing
  - DP4 – Minimising the loss of affordable housing
  - DP5 – Homes of different sizes
  - DP6 – Lifetime homes and wheelchair housing
  - DP7 – Sheltered housing and care homes for older people
  - DP8 – Accommodation for homeless people and vulnerable people
  - DP9 – Student housing, bedsits and other housing with shared facilities
  - DP26 – Managing the impact of development on occupiers and neighbours



## 2 Affordable housing and housing in mixed use development

### KEY MESSAGES

- Affordable housing includes social rented housing and intermediate affordable housing
- Residential and mixed-use development adding 1,000 sq m gross housing or more should provide affordable housing
- Most mixed-use developments with residential floorspace should provide 50% affordable housing
- Residential developments should provide a proportion of affordable housing depending on their capacity for homes, taking into account proposed floorspace and number of dwellings
- Residential developments with capacity for 50 or more homes should provide 50% affordable housing
- Affordable housing should include a large proportion of family homes and contribute to creating mixed and inclusive communities
- Affordable housing should generally be provided on site

- 2.1 The guidance on affordable housing relates to Core Strategy policy CS6 - *Providing quality homes*, and Development Policies DP3 – *Contributions to the supply of affordable housing*, DP4 – *Minimising the loss of affordable homes*, and DP5 – *Homes of different sizes*. The guidance on housing in mixed-use development relates to Core Strategy policy CS1 – *Distribution of growth* and Development Policy DP1 – *Mixed-use development*.
- 2.2 The guidance is divided into seven subsections. Each subsection deals with a different question relating to requirements for affordable housing and housing in mixed-use development as follows:
- what is affordable housing?
  - which developments should contribute to affordable housing?
  - how much affordable housing do we expect?
  - what types of affordable housing do we expect?
  - how is affordable housing funded?
  - how will the Council consider financial viability?
  - can the market housing and affordable housing be provided off-site?
- 2.3 The property market, development finance and affordable housing funding have all been subject to considerable change since 2007, and it is likely that change will continue.
- 2.4 The implementation of planning policy will need to respond to these changes. Implementation guidance therefore needs to be more readily

reviewed and amended than would be possible within the Core Strategy or Development Policies.

- 2.5 The Government has introduced changes to affordable housing funding, changes to affordable housing tenancies, and changes to the benefits system. The Mayor of London has also published draft alterations to the London Plan to reflect these changes, but the draft alterations have yet to be finalised. Details of how these changes will operate are still emerging, but they are likely to have far-reaching effects on the potential to develop affordable housing in Camden that provides for the households that need it most. This guidance will therefore continue to be subject to review as the need arises.

### **When does this guidance apply?**

- 2.6 This guidance applies primarily to development that:
- provides an additional 1,000 sq m or more (gross) of housing in Use Class C3 or Use Class C4, or
  - provides an addition of 200 sq m or more (gross) of non-residential floorspace in the Central London Area (excluding Hatton Garden) or the town centres of Camden Road, Finchley Road/ Swiss Cottage and Kilburn High Road, or
  - provides affordable housing floorspace, or
  - involves the loss and replacement of affordable housing floor space.
- 2.7 We strongly encourage developers to involve a housing association or other affordable housing provider in the design of proposed affordable homes before submitting a planning application. Affordable housing development that is not purpose-designed is less likely to receive public funding and less likely to be sold or let to an affordable housing provider.

#### **HOUSING ASSOCIATIONS AND REGISTERED PROVIDERS**

In this guidance, the term housing associations is used to include all Registered Providers of affordable housing. Registered Providers are owners and managers of affordable housing who are regulated by Government. Many operate on a not-for-profit basis and use any trading surplus to maintain existing homes and to help finance new ones. Other Registered Providers include housing trusts and cooperatives.

- 2.8 A developer considering the appropriate use or mix of uses for a site should contact the Council's Regeneration and Planning Division in the first instance. The Strategic Planning and Information Team can provide initial guidance on the interpretation of policies in the Core Strategy and Development Policies document.
- 2.9 A formal pre-planning application advice service is available for development proposals. A fee is charged for this service on the basis of the size of the proposed development. We strongly encourage developers to use this service if they are proposing development of the type described in paragraph 2.6 of this guidance.

- 2.10 Where we are seeking affordable housing the developer should contact the Housing Commissioning and Partnerships Team. This team will provide guidance on the types of affordable housing that the Council is currently prioritising and suggest potential housing association partners that would be appropriate for the scheme. Paragraphs 2.56 and 2.57 of this guidance give more details of the Council's arrangements with housing associations.

## **Guidance**

### **What is affordable housing?**

- 2.11 Affordable housing is defined in the Government's Planning Policy Statement PPS3 – Housing (Annex B). PPS3 indicates that affordable housing should:
- meet the needs of households whose needs are not met by the market and who are eligible for affordable housing, and
  - be provided at a cost they can afford, taking into account local household incomes and market housing costs, and
  - be affordable to future households unless arrangements are in place for subsidies to be recycled into alternative affordable housing provision.
- 2.12 The London Plan provides details of income groups that are eligible for affordable housing, which the Mayor reviews annually.
- 2.13 Two types of affordable housing are defined in PPS3 – these are **social rented housing** and **intermediate affordable housing**. The Government intends to introduce a third type known as **affordable rented housing**.
- 2.14 **Social rented housing** is primarily housing managed by local councils and housing associations. The cost of social rented housing is controlled by a national rent regime. Other affordable housing providers may manage social rented housing under the same rental arrangements. Figure 1 provides information on the level of social rents and market rents in Camden.

**Figure 1. Housing costs in Camden 2008**

	1 bedroom	2 bedroom	3 bedroom	4 bedroom
social rented housing costs (per week)	£70	£82	£91	£101
market housing costs to rent (per week)	£240	£330	£450	£575
market housing price to buy	£275,000	£330,000	£425,000	£675,000

Source: Camden Housing Needs Survey Update 2008

(note – market costs given are for lower quartile rents in the cheaper areas of the borough – in these areas, 25% of market rents/ prices are lower than the figure given and 75% of market rents/ prices are higher)

- 2.15 **Intermediate affordable housing** is housing that costs more than social housing but less than equivalent market housing. Intermediate affordable housing costs (including service charges) must also be cheap enough for eligible income groups to afford. The London Plan and the Mayor's annual reviews provide details of eligible income groups. Most intermediate affordable housing in Camden has been provided by housing associations, but PPS3 indicates that intermediate affordable housing can include homes provided by private sector bodies. Provided that it costs less than market housing and is cheap enough for eligible income groups, intermediate affordable housing can include a range of tenures such as:
- rented housing;
  - shared-ownership housing (where occupiers buy a share and rent the remainder) and;
  - low cost homes for sale.
- 2.16 Camden controls the cost of intermediate affordable housing taking into account market costs and the eligible income groups set out in the London Plan and the Mayor's annual reviews. The Mayor's February 2011 review indicated that eligible households were those with incomes of less than £64,000 per year (gross). The draft replacement London Plan indicates that he intends to raise the eligible income to £74,000 per year for intermediate affordable homes with 2-bedrooms or more.
- 2.17 To convert income thresholds into housing costs, the Mayor's Housing Supplementary Planning Guidance (2005) indicates that intermediate affordable housing should cost:
- no more than 3.5 times the household income threshold to buy; and
  - no more than 40% of net household income including rent and service charges.
- 2.18 Camden's Core Strategy recognises that intermediate affordable housing needs to be attractive to a range of household types across a

range of incomes. More guidance is provided on how we seek a range of intermediate affordable housing in the sub-section 'What types of affordable housing do we expect?'

- 2.19 Affordable rented housing is a new product devised by the Government. The Government intends this to be outside the national rent regime. Rents should not exceed 80% of local market rents. The Mayor of London has also published draft alterations to the London Plan to reflect the new product, but the draft alterations have yet to be finalised. This guidance will be reviewed when the potential contribution of affordable rented housing is understood more clearly.

### **Which developments should contribute to affordable housing?**

- 2.20 Camden's Development Policies document indicates that the Council will expect all residential developments with capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing. This also applies to mixed-use developments that include housing and have capacity for 10 or more dwellings in addition to any appropriate non-residential floorspace.
- 2.21 Camden's Development Policies document also indicates that an additional floorspace of 1,000 sq m (gross) is capable of accommodating 10 dwellings, and any development adding residential floorspace of 1,000 sq m (gross) or more should make a contribution to the supply of affordable housing.
- 2.22 A contribution to affordable housing is expected from schemes that add fewer than 10 dwellings but add more than 1,000 sq m floorspace (gross) on the basis that economic viability can still be achieved from a small number of larger and more expensive homes. A contribution will also be sought from schemes that add 10 or more dwellings but add less than 1,000 sq m floorspace (gross) unless the applicant demonstrates it would not be financially viable to proceed with the development on that basis (see the sub-section How will the Council consider financial viability?).
- 2.23 We acknowledge that an addition of 1,000 sq m residential floorspace will not have a 10 dwelling capacity in every single case. In assessing capacity, the Council will take into account whether the additional area is capable of contributing to the number of homes in the scheme (e.g. does it have access to natural light?). We will also take into account any other constraints that would prevent 10 dwellings from being developed, such as where it would be impractical to provide safe vehicle access for 10 dwellings, or inappropriate to subdivide a Listed Building.
- 2.24 Under Development Policy DP1, the Council requires mixed-use developments to include housing where appropriate. Paragraphs 1.19 to 1.24 of the Development Policies document provide more guidance on how the Council will consider whether a contribution to the supply of housing is appropriate. In the Central London Area (except Hatton

Garden) and the larger town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development proposals add 200 sq m (gross) floorspace or more, policy DP1 requires up to 50% of additional floorspace to be housing. This requirement combines with the affordable housing requirements of policy DP3 so that in the Central London Area and the larger town centres, where developments add 2,000 sq m (gross) floorspace or more:

- the Council will generally seek 1,000 sq m or more of additional housing;
- the development will generally have capacity for 10 or more additional homes, and we will expect a contribution to the supply of affordable housing.

2.25 The floorspace thresholds relating to Development Policies DP1 and DP3 refer to additions to gross floorspace (and are assessed in terms of Gross External Area – GEA – including each floor, including the thickness of external walls, partition walls and common areas). The policy requirements in policy DP1 are not triggered by increases in net non-residential floor space that take place wholly within the existing building envelope, such as reduction in circulation space, common areas or plant areas, or inserting a mezzanine floor. However, works involving a change to residential use will trigger policy DP3 affordable housing requirements if the residential floorspace has capacity for 10 or more additional homes.

2.26 Floorspace measurements are sometimes provided which exclude common areas and exterior walls of the building (this often applies to flats), or just exclude the exterior walls (this often applies to houses). Where a figure for Gross External Area including common areas is not available, the Council will consider using a conversion factor to assess the housing/ affordable housing requirement and to calculate the payment in lieu.

- To convert to GEA where common areas and exterior walls have been excluded - multiply by 1.25.
- To convert to GEA where only exterior walls have been excluded – multiply by 1.053.

#### **GROSS EXTERNAL AREA/ GROSS EXTERNAL FLOORSPACE**

The whole area of a building taking each floor into account. Includes the thickness of external walls, partition walls and common areas such as shared staircases, entrance halls and corridors.

#### **GROSS INTERNAL AREA/ GROSS INTERNAL FLOORSPACE**

The whole enclosed area of a building within the external walls taking each floor into account and excluding the thickness of the external walls. Includes the thickness of partition walls and common areas such as shared staircases, entrance halls and corridors.

#### **NET INTERNAL AREA/ NET INTERNAL FLOORSPACE**

The usable area within a building measured to the face of perimeter or party walls. Includes the thickness of internal partition walls, but

excludes common areas and the thickness of partition walls that define the edge of common areas.

- 2.27 As indicated in the Development Policies document, the approach to affordable housing set out in policy DP3 and in this guidance is suitable for housing that is self-contained, including self-contained sheltered housing for older people (i.e. homes in Use Class C3). The approach will also apply if additional floorspace is proposed in Use Class C4 (small houses in multiple occupation) as these can be used as self-contained C3 homes without submitting a planning application.
- 2.28 This approach to affordable housing is not suitable for housing with shared facilities, such as student housing and bedsits. A contribution to affordable housing is not generally expected from developments of student housing and other housing with shared facilities provided that it complies with Development Policy DP9 and contributes to creating a mixed and inclusive community. However, the Council will seek to ensure that student housing is attractive to groups who would otherwise share private rented homes, and in some circumstances will seek self-contained general needs housing on part of the site, including affordable housing. A separate section of our planning guidance gives more information about development of **Student Housing**.
- 2.29 The Council may need to consider controlling the affordability of care homes for older people and accommodation for homeless people or vulnerable people. Some aspects of this guidance will not be suitable for these types of housing, and the Council will tailor its approach as appropriate to fit the specific type of occupier and provider.

### **How much affordable housing do we expect?**

- 2.30 Our Core Strategy and Development Policies give targets and criteria which we use to assess the appropriate contribution to affordable housing from each development. These include:
- an overall borough target equivalent to 220 additional affordable homes per year;
  - seeking to achieve the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development;
  - aiming to minimise social polarisation and create mixed and inclusive communities;
  - an affordable housing target for specific developments of 50% of additional residential floorspace; and
  - a sliding scale setting lower affordable housing targets for developments that have capacity for 10 to 49 additional homes.
- 2.31 The sliding scale is explained in paragraphs 3.17 to 3.20 of our Development Policies document. The purpose of the sliding scale is to encourage developers to cross the 10-dwelling threshold and propose medium-sized schemes rather than small schemes. In this way the

sliding scale has potential to add significantly to the number of schemes that deliver affordable housing, and the overall amount of affordable housing. Paragraph 3.21 of the Development Policies document indicates that we will monitor the operation of the sliding scale closely to assess its impact on the supply of housing, and consider any need to review the approach through our Annual Monitoring Report.

- 2.32 The sliding scale is a simple straight-line scale, where every increase of 1 home in site capacity should provide an additional 1% in affordable housing floorspace. Sites with capacity for 10 additional homes should normally provide 10% affordable housing floorspace, sites with capacity for 20 additional homes should normally provide 20% affordable housing floorspace, and sites with capacity for 40 additional homes should normally provide 40% additional floorspace. Figure 2 below indicates how the sliding scale will operate in more detail.
- 2.33 When we assess capacity, we will look at the number of additional homes proposed and the additional built floorspace (GEA). As a minimum, an acceptable development has capacity for the number of additional homes proposed. In terms of floorspace, 1,000 sq m (GEA) of built development is considered to have capacity for 10 dwellings. Each additional 100 sq m (GEA) added to the development is considered to create capacity for an additional dwelling (including capacity for a share of common areas such as shared staircases, entrance halls and corridors). We will round floorspace to the nearest 100 sq m to give capacity in terms of the nearest whole number. In negotiations we will focus on seeking affordable homes of an appropriate size and layout rather than absolute mathematical correspondence with the sliding scale.



Figure 2. Sliding scale for affordable housing negotiations

<b>Benchmark</b>	<b>Site capacity</b>	<b>Expected affordable housing floorspace</b>
10 homes proposed, or fewer homes with a floorspace of 1,000 sq m gross	10 homes	10%
20 homes proposed, or fewer homes with a floorspace of 2,000 sq m gross	20 homes	20%
30 homes proposed, or fewer homes with a floorspace of 3,000 sq m gross	30 homes	30%
40 homes proposed, or fewer homes with a floorspace of 4,000 sq m gross	40 homes	40%
50 homes or more proposed, or fewer homes with a floorspace of 5,000 sq m gross or more	50 homes or more	50%
<b>Example</b>	<b>Site capacity</b>	<b>Expected affordable housing floorspace</b>
11 homes with a built floorspace of 925 sq m gross	11 homes	11% x 925 sq m
21 homes with a built floorspace of 1,735 sq m gross	21 homes	21% x 1,735 sq m
21 homes with a built floorspace of 2,360 sq m gross	24 homes	24% x 2,360 sq m
35 homes with a built floorspace of 3,749 sq m gross	37 homes	37% x 3,749 sq m
46 homes with a built floorspace of 4,280 sq m gross	46 homes	46% x 4,280 sq m
53 homes with a built floorspace of 4,640 sq m gross	50 homes or more	50% x 4,640 sq m

2.34 As indicated in paragraphs 1.12 and 3.18 of our Development Policies document, the sliding scale will only apply to mixed use developments that include housing in limited circumstances.

- The sliding scale will apply if the development adds less than 1,000 sq m to non-residential floorspace but has a residential element with capacity for an additional 10 to 49 homes (i.e. 1,000sq m to 4,900sq m residential floor space).
- The sliding scale will not apply if the development includes an addition to non-residential floorspace of 1,000 sq m or more. In this case there is significant potential for the non-residential element to enhance the viability of the development, and we will seek 50% of residential floorspace as affordable housing (subject to DP3 criteria).

- In all mixed-use schemes with capacity for 50 or more additional homes we will seek 50% of residential floorspace as affordable housing (subject to DP3 criteria).
- 2.35 When negotiating on individual schemes, Camden calculates the proportion of housing in each category (market/ social rented/ intermediate affordable) in terms of floorspace. This arrangement enables us to negotiate family-sized affordable housing in schemes where the developer proposes smaller market homes, and prevents an under-provision of affordable housing where the developer proposes unusually large market homes. Calculations will not generally be based on the number of dwellings or number of habitable rooms as these calculations would create an incentive for the developer to provide the smallest affordable homes possible.
- 2.36 Calculations of the capacity of the site are based on gross floorspace (GEA), including common areas. However, once the GEA has been used to identify the target affordable housing percentage, it is then generally more appropriate to use net internal floorspace when considering the split between market, social rented and intermediate housing. This allows the homes themselves to be compared without the distortion of shared spaces such as external corridors and lobbies, lifts and common staircases. See paragraph 2.26 of this guidance for more detailed definitions of gross and net floorspace.
- 2.37 Policy CS6 of our Core Strategy and Development Policy DP3 indicate that the Council will consider many other characteristics of the development, the site and the area when negotiating the proportion of affordable housing in specific schemes. These considerations are explained in detail in paragraphs 3.24 to 3.29 of our Development Policies document. Considerations include seeking a mixture of tenures in each part of the borough, having regard to any social problems arising from existing concentrations of a single tenure, and other planning objectives considered to be a priority for the site. As part of estate regeneration we will seek to improve the tenure mix in some areas of concentrated social rented housing, such as parts of Gospel Oak.
- 2.38 Where we agree that the affordable housing can be provided off-site, the amount of affordable housing sought will be adjusted. These adjustments are explained in the sub-section '**Can the market housing and affordable housing be provided off-site?**'
- 2.39 The Camden Affordable Housing Viability Study 2009 examined the viability of the sliding scale and the 50% floorspace target for sites with capacity for 50 homes or more. The Study indicates that the scale and target is financially viable for a range of scheme types across a range of locations in the borough. However, there will be circumstances where the percentage of affordable housing sought by the sliding scale or target is not viable. The sub-section '**How will the Council consider financial viability?**' explains what we will expect from the developer in these circumstances.

## What types of affordable housing do we expect?

### Mixing affordable housing and market housing

- 2.40 The Council expects affordable housing and market housing to form integral parts of each development. A common design approach should be used, with high quality materials and finishes throughout. Where a development site is large enough to accommodate several residential blocks, market and affordable blocks should be spread evenly across the site. The layout of the development should optimise residential amenity for all tenures, and avoid concentrating affordable housing close to potential sources of disturbance such as service yards, traffic and railways.
- 2.41 As indicated in paragraph 3.26 of our Development Policies document, in schemes with internal communal spaces, the Council does not generally seek to mix affordable and market dwellings on the same corridors or sharing the same stairs, lifts and entrance lobbies. This is because occupiers have to pay a service charge and/ or management charge for the cleaning and maintenance of communal spaces. Service charges are often a significant proportion of overall housing costs, particularly in market housing blocks, and can simply be too high for the occupiers of affordable housing to pay. The law ensures that an occupier cannot be required to pay higher service charges to subsidise charges to another occupier receiving the same common services, regardless of tenure. To ensure that service charges are kept to a minimum, the communal parts of affordable housing are generally designed for durability and low maintenance costs.

#### **SERVICE CHARGES**

A contribution towards the cost of repairs to the building, and maintenance of communal areas.

- 2.42 Where it is necessary for affordable and market housing to share the same entrances, stairs and lifts, the Council will seek to negotiate service charges sufficiently low for the affordable housing to be available to eligible households. Paragraph 3.14 of the Development Policies document notes that the Council may consider an off-site contribution to affordable housing if the service or management charges of an on-site scheme would be too expensive for affordable housing occupiers or providers. The Council will only take this step where measures to keep service and management charges within affordable limits have been fully explored and found to be impractical. For more information - see the sub-section of this guidance '**Can the affordable housing be provided off-site?**'

### Mix of social rented housing and intermediate affordable housing

- 2.43 The Core Strategy indicates that we are aiming to tackle social polarisation and create mixed and balanced communities by seeking a diverse range of housing products to suit a range of incomes. Many households who need affordable homes in Camden will only be able to

afford social rented housing, however we recognise that intermediate affordable housing can make an important contribution to creating mixed-communities. Camden's Core Strategy sets out guidelines that 60% of affordable housing should be social rented housing and 40% should be intermediate affordable housing. As indicated in paragraphs 2.35 and 2.36 of this guidance, it will generally be appropriate to calculate the split between social rented and intermediate affordable housing in terms of net internal floorspace.

- 2.44 Since adoption of Camden's Core Strategy and Development Policies document, the Government has introduced a new product called affordable rented housing. More information about affordable rented housing is provided in paragraph 2.19 of this guidance. Initial indications are that the potential for affordable rented housing to meet housing need in Camden is limited, although small affordable rented homes may be able to help tackle social polarisation. This guidance will be reviewed when the potential contribution of affordable rented housing is understood more clearly. In the interim, proposals for affordable rented housing should be accompanied by a demonstration that the homes will comply with the Government's definition of affordable housing and will be affordable to households whose needs are not met by market housing, having regard to lower quartile market rents available locally and across the borough. The Council is unlikely to support proposals for affordable rented homes that would be more expensive than market homes available anywhere in the borough.
- 2.45 Paragraph 6.57 of Camden's Core Strategy and Development Policy DP3 indicate that the Council will consider various characteristics of the development, the site and the area when negotiating the nature of the affordable housing contribution from specific schemes. Considerations that may influence the proportion of social rented housing and intermediate affordable housing are set out in paragraphs 3.22 to 3.30 of our Development Policies document. Circumstances where the Council may depart from the 60% social rented: 40% intermediate affordable split include:
- providing flexibility for up to 100% social rented housing or 100% intermediate affordable housing where the overall proportion of affordable housing in the scheme is substantially over 50%;
  - seeking up to 100% social rented housing where the overall proportion of affordable housing in the scheme is 30% or less;
  - providing flexibility for more than 40% intermediate affordable housing where this can help to create a mixed an inclusive community in an area with an existing concentration of social rented housing; and
  - providing flexibility for more than 60% social rented housing where high residential land values will make intermediate affordable housing too expensive for the households that need it.
- 2.46 A number of intermediate housing types have been devised by the Government (most are currently marketed in London as First Steps). Camden seeks a variety of intermediate housing to suit different needs,

and will generally support intermediate rented housing, shared-ownership housing (where occupiers buy a share and rent the remainder) and models where occupiers can switch from rent to shared-ownership. However, all intermediate housing must comply with the cost requirements imposed by the Government and Mayor as indicated in paragraphs 2.15 to 2.17 of this guidance. When costs are assessed, service charges are included, and we will encourage developers to take this into account at the design stage so that service charges are minimised.

#### **FIRST STEPS HOMEBUY**

First Steps is a scheme backed by the Government and the Mayor of London to provide affordable home ownership. It is available to tenants in social rented housing, people on the waiting list, and first-time buyers with a limited income, such as key workers.

- 2.47 We are particularly keen to promote take up of intermediate housing by tenants of social rented housing. On the basis of the household incomes of those registering an interest in intermediate housing, Camden will seek to achieve a proportion of the following:
- intermediate rented homes that households can afford with an income of £30,000 or less per year (gross);
  - one-bedroom shared-ownership homes that households can afford with an income of £30,000 or less per year (gross);
  - two-bedroom shared-ownership homes that households can afford with an income of £40,000 or less per year (gross).
- 2.48 In negotiations on intermediate housing and legal agreements, the Council will seek to ensure that homes are occupied by households in need of affordable housing, particularly tenants of existing social housing, and do not remain vacant due to high costs or a shortage of mortgage finance. We will provide flexibility within legal agreements to allow different intermediate models to be used depending on demand when the development is completed. We will also provide for intermediate housing to be used as social rented housing where such this would be viable in the context of the overall financial viability of the development and any public subsidy available.
- 2.49 In the case of shared ownership housing, we will use legal agreements to reduce the costs to occupiers by:
- ensuring that buyers are able to buy a relatively low percentage share – generally we will set the minimum share at no more than 25%; and
  - limiting the level of the rent paid on the unsold share – generally we will set the maximum rent at 2% of the value of the unsold share.
- 2.50 Intermediate housing is currently available to tenants of social rented housing and other first-time buyers, including key workers. Key workers are generally defined as staff of public authorities such as the NHS, teachers, social workers, fire-fighters, the police and the armed forces. The Council will not generally limit occupation of intermediate housing to

key workers. Where a restriction to key workers is appropriate in the context of the characteristics of the development or the area, Camden will generally use the definition of key workers given in this guidance, varied as necessary to meet the purpose of the proposal (eg for development on NHS land to provide housing for nurses). When considering the proportion of key worker housing appropriate to a development, the Council will have regard Development Policy DP3, the characteristics of the development and the area and the circumstances noted in paragraph 2.45 of this guidance.

### **Mix of dwelling sizes**

- 2.51 The Council's Residential development standards (included as section 4 of this CPG) give general guidance on the floorspace and internal arrangements for all housing tenures. In addition, homes of all tenures should meet lifetime standards in accordance with Development Policy DP6 and the guidance in this CPG on Lifetime homes and wheelchair housing. Three other sets of guidance are particularly relevant to affordable housing design:
- The London Plan 2011 sets residential space standards that the Mayor will apply to development of housing in all tenures.
  - Housing with public subsidy in London must comply with the Mayor's London Housing Design Guide (published in interim form in August 2010).
  - Housing Supplementary Planning Guidance November 2012 published by the Mayor of London incorporates elements of the London Housing Design Guide and applies to development of housing in all tenures.
- 2.52 This sub-section of the guidance is concerned primarily with the numbers of bedrooms that are expected as part of affordable housing development. Camden's Core Strategy indicates that we will seek a range of self-contained homes to meet identified dwelling size priorities. These priorities are set out in detail in our Development Policies document, which includes a Dwelling Size Priorities Table. For social rented housing, we prioritise all dwellings with two or more bedrooms, but the highest priority is given to social rented homes with 4-bedrooms or more. For intermediate affordable housing, we prioritise dwellings of all sizes, but give higher priority to dwellings with 2-bedrooms or more. More detailed guidance is given in the following Figure 3 and Figure 4.

**Figure 3. Mix of social rented housing**

<p><b>Overall aim: 50% of homes with 3 bedrooms or more</b></p> <p><b>Preferred mix:</b></p> <ul style="list-style-type: none"> <li>• 1-bedroom homes – no more than 20%</li> <li>• 2-bedroom homes – 30%</li> <li>• 3-bedroom homes – 30%, or 50% if no 4-bedroom homes are provided</li> <li>• 4-bedroom homes – 20%</li> </ul> <p><b>Other objectives:</b></p> <ul style="list-style-type: none"> <li>• Social rented homes should have physically separate kitchens and living areas where practical, particularly 3- and 4-bedrooms homes. We will seek the design of 100% of 3 bedroom and 50% of 2 bedroom social rented homes with physically separate kitchens and living areas.</li> <li>• At least 10% of homes should be designed, built and fitted-out to meet wheelchair housing standards in accordance with Development Policy DP6, subject to accompanying paragraph 6.9.</li> </ul>
---

**Figure 4. Mix of intermediate affordable housing**

<p><b>Overall aim: 10% of homes with 3 bedrooms or more</b></p> <p><b>Preferred mix:</b></p> <p>In order to meet needs while remaining within the cost limits set out in paragraphs 2.15 to 2.17 of this guidance, we expect most intermediate affordable homes in Camden developments to have 1- or 2-bedroom homes.</p> <ul style="list-style-type: none"> <li>• Studio flats – a proportion of studio flats may be acceptable, but we will generally resist development where all the intermediate affordable homes are studio flats</li> <li>• 1-bedroom homes – a proportion is expected in all schemes</li> <li>• 2-bedroom homes – a proportion is expected in all schemes</li> <li>• 3-bedrooms or more – 10% or more where it is possible to provide them within cost limits</li> </ul> <p><b>Other objectives:</b></p> <ul style="list-style-type: none"> <li>• We will seek the design of 20% of 2 bedroom intermediate homes with physically separate kitchens and living areas.</li> <li>• At least 10% of homes should be designed, built and fitted-out to meet wheelchair housing standards in accordance with Development Policy DP6, subject to accompanying paragraph 6.9.</li> </ul>
--

- 2.53 The precise mix of dwellings will be negotiated with developers, affordable housing providers and any employers involved in each scheme, taking into account the character of the development, the site and the area, and other criteria included in Development Policy DP5. We will take full account of guidance in the Development Policies document dealing with large homes, child density and separate kitchens (paragraphs 5.11 to 5.13), and wheelchair housing (paragraph 6.9). Any

proposals for affordable rented housing should include an appropriate mix of dwelling sizes having regard to paragraphs 2.51 and 2.52 of this guidance and to the cost of the proposed homes relative to social rented and intermediate affordable housing.

- 2.54 Where schemes involve both social rented housing and intermediate affordable housing, it may often be appropriate to have a high proportion of one-bedroom intermediate affordable homes and a high proportion of social rented homes with three bedrooms or more. Such schemes can potentially meet our dwelling size priorities while limiting the cost of the intermediate affordable housing and limiting overall child density.

### **How is affordable housing funded?**

- 2.55 Public subsidy will usually be needed to supply the proportions of affordable housing anticipated by the Core Strategy and Development Policies. The main source of public subsidy has been the Homes and Communities Agency until recently, although the Agency's framework document for 2011-2015 indicates that grant availability will be limited for affordable homes that are required by planning policy. The Council also administers its own affordable housing fund, which is formed from developer contributions where a payment-in-lieu has been provided instead of housing or affordable housing. The Council will consider providing subsidy from the affordable housing fund where funding from the Homes and Communities Agency (or successor organisations) is not available or is unable to secure an acceptable proportion and mix of affordable housing. In particular, the Council may offer subsidy from the affordable housing fund to secure additional large homes (3 or 4 bedrooms) and additional wheelchair housing.
- 2.56 The NPPF indicates that affordable housing should remain at an affordable price for future eligible households, or if these restrictions are lifted, the subsidy should be recycled. In practice, almost all additions to affordable housing in the borough that are associated with market development are transferred to a housing association on completion. Where this is the case, we will ensure that the property remains available as affordable housing by negotiating transfer of the freehold to the housing association. Where this is not possible, for example because of mixed-tenures or commercial uses within the block, the Council will negotiate for a long-lease to the housing association, ideally 125 years.
- 2.57 Where the affordable housing is to be transferred to a housing association, one or more housing associations will usually submit bids to the developer to indicate how much they are able to pay for the transfer of ownership. The payment will be inclusive of any public subsidy, the capitalised value of future rents, and the value of any equity that will be sold (usually arising from shared-ownership housing). Camden's Affordable Housing Viability Study 2009 estimated that where subsidy is available payments have typically been around 60% of the market value of social rented homes and 80% of the market value of shared-ownership homes. These estimates reduce to 40% and 60%



respectively if no public subsidy is available. For specific schemes these percentages will vary with market values, the availability of credit, levels of public subsidy, changes to Government controls on rents and changes to the Mayor's guidance on the income level of occupiers.

- 2.58 The Government has reduced the amount of public funding available for affordable housing. This is expected to lead to a reduction in the number of developments that receive subsidy and a reduction in the amount of any subsidy paid for each home. We acknowledge that if public subsidy is not available the proportions of affordable housing anticipated by the Core Strategy and Development Policies will not be viable in all developments.
- 2.59 In some cases, it may be possible to provide intermediate housing without direct public subsidy, particularly shared ownership homes. Such opportunities can arise where land is acquired cheaply, where unusually small homes are developed, or where charitable contributions are available. We will actively pursue such opportunities, and (in accordance with paragraph 2.45 of this guidance) may be prepared to consider schemes with up to 100% intermediate housing where the overall proportion of affordable housing floorspace in the development is substantially more than 50%. Where intermediate housing is provided without public subsidy, we will still use a legal agreement to secure the long-term availability of the homes as affordable housing for eligible households.

### **How will the Council consider financial viability?**

- 2.60 Our Core Strategy and Development Policies outline a number of Council aims and commitments relating to housing and mixed-use development that provide a framework for considering financial viability:
- housing is the priority land-use of the Local Development Framework
  - we will seek to **maximise the supply of additional housing**, and
  - we will seek the **maximum reasonable amount of affordable housing** on each site, taking into account specific circumstances including the financial viability of the development
  - to maximise overall housing supply, we will implement policies flexibly in response to economic uncertainty
  - to ensure that housing development is viable, we may consider varying the proportion and/ or type of market and affordable housing in a development, or consider off-site solutions where necessary (see the sub-section '**Can the affordable housing be provided off-site?**')
- 2.61 Where a development provides an addition of 200 sq m or more (gross) of non-residential floorspace in the Central London Area or the larger town centres, applicants will need to demonstrate that the development is providing an appropriate contribution to the supply of housing. Where a development has capacity for 10 or more additional dwellings, applicants will need to demonstrate that the development is providing the maximum reasonable amount of affordable housing. In most cases,

the applicant will be required to submit a financial viability appraisal to justify the proportions of housing and affordable housing proposed. This requirement may be waived where the development provides the proportion and mix of housing and affordable housing sought by Development Policies DP1, DP3 and DP5.

- 2.62 As indicated in our Development Policies document, in certain circumstances the Council will expect applicants to fund an independent verification of the financial viability appraisal. Independent verification will be required where the proportion or mix of housing/ affordable housing sought falls considerably short of the contributions anticipated by our Development Policies document. This independent verification will either be:
- commissioned directly by the Council in negotiation with the applicant; or
  - commissioned by the applicant from an independent body subject the Council agreeing the body and the specifications in advance.
- 2.63 A financial viability appraisal is a balance sheet for the development which enables all scheme costs and revenues to be taken fully into account. Several viability appraisal models are available, and the Council does not insist that a particular model is used. The GLA publishes an Affordable Housing Development Control Toolkit (also known as the Three Dragons Toolkit), and most financial viability appraisals submitted to the Council are prepared using the Toolkit. The GLA Toolkit was designed specifically to assist negotiations between planning officers and developers. The Toolkit is reviewed annually.
- 2.64 Viability appraisal of development requires the input of a range of information including build costs, developer's return (profit) and sales values. We will expect the inputs to the viability appraisal to be backed up by evidence e.g. quotations for building works, residential sales values achieved for comparable developments in the area. We will also expect cash flows to be modelled, and sensitivity testing to be provided to show the potential for the residual value to change significantly as a consequence of relatively small changes in the inputs. The GLA's Development Control Toolkit provides benchmark values for some inputs. The guidance notes accompanying the GLA Development Control Toolkit are available free and provide more detailed information on which costs can appropriately be included in a viability appraisal. The Council will closely scrutinise development costs that exceed benchmark figures. Where independent verification of the appraisal is required, this should include confirmation that the inputs used are appropriate and are in accordance with the evidence.

**Figure 5. Typical inputs to financial viability appraisal**

<b>Cost inputs</b>	<b>Revenue inputs</b>
demolition and build costs	sales values
professional fees	payment by a housing association for transfer of affordable housing
marketing fees	public subsidy for affordable housing (if not included above)
development finance costs	capitalised rents (non-residential floorspace)
planning obligations other than affordable housing	yield (non-residential floorspace)
developer's return (non-residential floorspace and market housing)	
contractor's return (affordable housing)	

2.65 Some of the information required for viability appraisal may be regarded as commercially sensitive. If requested, the Council will endeavour to prevent release of sensitive information to third parties. However, subject to agreement with the applicant, release of sensitive information may be necessary in some circumstances, such as:

- to enable independent verification of the viability appraisal
- where another body has a role in considering the application such as the Mayor and the GLA
- where another body has a role in providing public subsidy for the development such as the Homes and Communities Agency, the Mayor and GLA
- where the development is subject to a planning appeal.

2.66 The Council will not expect viability appraisal to include land value or acquisition cost as a fixed input. Valuations and acquisition costs generally reflect an assumption by the valuer about what can be developed on the site, including an assumption about the proportions of non-residential development, market housing and affordable housing that will be acceptable. If land value forms a fixed input to the appraisal, the process becomes circular, and the proportions of market housing and affordable housing that are viable will match the initial assumption of the valuer. The Council's preferred measures of land value are given in Figure 6.

**Figure 6. Measures of Land Value**

<b>Residual Value:</b>	the value of a development once all scheme costs and revenues have been taken into account, including build costs, professional fees, developer's returns and S106 contributions, but excluding site acquisition cost.
<b>Existing Use Value (or EUV):</b>	the value of a site in its lawful use. The Council will require evidence of the EUV, for example the value of rents paid by an existing occupier, or values achieved for sale of comparable sites continuing in the same use. The EUV should take account of revenue from the lawful use and any refurbishment or development costs that would be incurred to re-commence lawful use of a vacated site.
<b>Alternative Use Value:</b>	the residual value of a site if developed for an alternative use. There should be a valid permission for the alternative use (or uses), or agreement should be reached with the Council about which other uses would comply with our Core Strategy and Development Policies. The Alternative Use Value should take account of revenue from the alternative use and development costs that would be incurred to commence the alternative use.

- 2.67 The residual value should be an output of the viability appraisal. The Council will consider the development to be viable if the residual value exceeds the existing use value and any relevant alternative use value. We will also have regard to the NPPF advice that a viable development should provide competitive returns to a willing landowner and a willing developer. The Council will therefore consider market value and site acquisition costs if these are supported by evidence. Evidence should generally include values achieved for sale of comparable sites. Where independent verification of the appraisal is required, this should include confirmation that the evidence of comparable sales values is appropriate.
- 2.68 We strongly advise applicants to discuss the general parameters of individual viability appraisals with us before they are prepared. Early discussions can ensure that the appraisal provides the evidence needed to assess the application and help to avoid delays after the application is submitted. For example, we will advise on whether viability appraisal of the proposed development should be accompanied by viability appraisal of alternative options such as:
- a development that meets our full expectations for housing and affordable housing contributions but is not viable
  - a development that partly meets our expectations for housing and affordable housing contributions
  - development for an alternative use
  - an alternative development falling below the relevant Development Policy thresholds (200 sq m in DP1 and 1,000 sq m in DP3)
  - a development above the thresholds that makes no contribution to housing or affordable housing

- an off-site contribution to housing or affordable housing

### **Deferred affordable housing contributions**

- 2.69 London Plan policy 3.12 and Camden Development Policy DP3 indicate that the Council should seek the maximum reasonable amount of affordable housing in negotiations relating to residential and mixed-use sites. Many factors can have a significant impact on the maximum viable contribution to affordable housing, including changes to sales values, changes to build costs, changed specifications for materials and finishes and changes to the cost of finance. These factors can change quickly, and changes of a few percentage points can have a significant impact on the viability of a development. For example, house prices have risen steadily in Camden since the beginning of 2010. In the year to June 2010, prices had risen by 14.6%, with another 4.9% increase by June 2011, and another 6.8% higher by June 2012 (source: Land Registry). Significant changes to viability are particularly likely if there is a long lead time from the grant of planning permission to completion of the development.
- 2.70 The Council will therefore seek to negotiate deferred affordable housing contributions (similar to 'contingent obligations' referred to in London Plan policy 3.12) for developments where the provision of housing/ affordable housing falls significantly short of targets in Development Policies DP1 and DP3 due to financial viability, and there is a prospect of viability improving prior to completion. The deferred contribution is not a fixed amount, but is capped at the shortfall between the amount of additional housing/ affordable housing proposed and the Council's policy targets. The actual contribution is determined by a further viability appraisal undertaken at an agreed point after approval of the development but before the scheme is fully occupied.
- 2.71 A deferred contribution is only triggered if the further financial viability appraisal shows that there has been sufficient growth in viability. If the residual value of the development exceeds an agreed benchmark site value, then the excess is split equally between the developer and the Council unless the Council's share reaches the cap, in which case the contribution matches the shortfall between housing/ affordable housing provision and the Council's policy targets.
- 2.72 Given the pace of recent house price rises in Camden and current market uncertainties, the Council will generally seek a further financial viability appraisal as close to the end of the development process as possible so that recorded sales values and build costs can be used rather than estimates. Given the type and scale of housing development in Camden, it is difficult to change the mix of market and affordable housing after implementation, so deferred contributions will generally take the form of a payment-in-lieu.

- 2.73 The Council will generally seek to secure the following arrangements for deferred affordable housing contributions in a S106 agreement:
- the deferred affordable housing contribution will take the form of a payment in-lieu to the Council's affordable housing fund
  - the maximum contribution will be a payment-in-lieu based on the shortfall against housing/ affordable housing targets, calculated in accordance with CPG8 Planning Obligations
  - full details of the agreed financial viability appraisal which guided determination of the application will be recorded
  - the benchmark value for the site agreed in that appraisal (in accordance with paragraphs 2.66 and 2.67 of this guidance, and usually the existing use value or an alternative use value) will be recorded
  - a further financial viability appraisal will be required at a specific point during the development process – generally this will be either at practical completion, or when a specified number of homes in the development have been sold but there are sufficient unsold homes for sales proceeds to fund the deferred contribution
  - the developer will fund an independent verification of the further financial viability appraisal (as indicated in paragraph 2.62 of this guidance)
  - following independent verification, the agreed benchmark value will be subtracted from the residual value given in the further financial viability assessment – this calculation will give a negative value or zero (a deficit) or a positive value (a surplus)
  - if the calculation shows a deficit, no deferred affordable housing contribution will be required
  - if the calculation shows a surplus of less than twice the maximum contribution, then the deferred affordable housing contribution will be half of the surplus
  - if the calculation shows a surplus that is twice the maximum contribution or more, then the deferred affordable housing contribution will be capped at the maximum
  - following independent verification of the further financial viability appraisal, the Council will give formal notice of the sum required, and payment shall be made within 28 days
- 2.74 Different arrangements may be appropriate in some cases, depending on character and scale of the development. For example:
- Where a phased development is proposed, and improvements in viability could potentially provide additional affordable housing within the development, it may be appropriate to undertake further financial viability assessment earlier in the process.
  - In the case of large developments with a long site preparation and construction period, it may be appropriate to undertake more than one further financial viability assessment.

- It may occasionally be necessary to vary the formula for calculating surplus or deficit to reflect the particular viability appraisal model being used, but the Council will expect to agree a formula that reflects the principle set out in paragraph 2.71.
- An adapted mechanism will be necessary where a development will be managed for private rent by an institution.
- Using a growth model to assess viability may be an appropriate alternative to a deferred contribution in some circumstances where changes in the values and costs are predictable and the growth model will maximise the affordable housing offer at the time an application is determined.

2.75 The further financial viability appraisal should comply with all the requirements for financial viability appraisal set out in paragraphs 2.60 to 2.68, including the modelling of cash flows. As indicated in Core Strategy paragraph 19.17, the Council will expect developers to provide information on viability through an "open-book" approach, however the Council will endeavour to prevent release of commercially sensitive information as set out in paragraph 2.65 of this guidance. Where inputs such as build costs and sales values are based on estimates rather than agreed contracts and transactions on homes within the scheme, we will expect appraisals to use appropriate projections with reference to trends in the requisite segment of the housing market and to sources such as BCIS indices.

### **Can the market housing and affordable housing be provided off-site?**

- 2.76 Our Core Strategy and Development Policies promote mixed-use development and mixed and inclusive communities in line with the Government's NPPF. Development Policy DP1 indicates that housing contributions should normally be provided on site, while Development Policy DP3 indicates that affordable housing contributions should normally be made on site. Both policies do provide for off-site contributions, but only in a limited set of circumstances. The Council will only accept off-site contributions where provision cannot practically be achieved on-site in terms of meeting the criteria set out in the two Development Policies and accompanying paragraphs. The Council will only accept contributions in the form of payments-in-lieu in exceptional circumstances.
- 2.77 When considering the acceptability of off-site contributions and payments-in-lieu, we will have close regard to all relevant criteria in Development Policies DP1 and DP3 alongside accompanying paragraphs 1.15 to 1.24 and 3.13 to 3.30. We will also have regard to Core Strategy CS9 and the Council's support for residential communities in Central London, and ensure that off-site contributions do not undermine the benefits of mixed-use areas (such as those identified in paragraph 1.7 of our Development Policies document) or conflict with the creation of mixed and inclusive communities. These considerations apply to all sites regardless of size.

- 2.78 The Council will particularly expect contributions to be made on-site where the development is larger. Where mixed-use policy DP1 applies, we will expect on-site housing contributions where 1,000 sq m (gross) or more of additional floorspace is proposed. Where affordable housing policy DP3 applies, we will expect on-site affordable housing contributions where 3,500 sq m (gross) or more of additional floorspace is proposed. It may not always be practical to include affordable housing within a market development (for example in smaller developments), however prior to considering an off-site contribution the Council will expect developers of all schemes to demonstrate that, on-site provision is not practical having regard to all the considerations referred to in paragraph 2.77 of this guidance.
- 2.79 The NPPF indicates that affordable housing provision should be made on-site unless an off-site solution is robustly justified. To meet this objective, the Council expects all options for on-site affordable housing to be fully explored, even where small developments are involved. Before they submit an application, we will expect applicants to fully consider different arrangements of the site and the scheme to secure the best possible prospect of achieving an on-site affordable housing contribution. In particular, applicants will be expected to show that the following options cannot practically deliver an on-site contribution before off-site solutions will be considered:
- where the site characteristics provide potential for a variety of scheme design and layouts, designing the scheme to provide a separate entrance (or entrances) and stair/ lift core(s) for affordable homes
  - where it is only possible to provide a single entrance lobby and stair/ lift core, designing the communal spaces to ensure that service and management charges are sufficiently low for affordable housing occupiers and providers (see also paragraph 2.41 of this guidance)
  - approaching a range of housing associations and other providers (including the Council) to seek bids for acquisition of on-site affordable homes
  - offering flexibility to housing associations and other providers to deliver different types of affordable housing (eg intermediate housing)
  - where providing the full affordable housing contribution on-site is not financially viable, providing a reduced affordable housing floorspace on-site
  - where an on-site solution is not financially viable, seeking a top-up payment from the Council's affordable housing fund.

#### **Making the contribution on another site**

- 2.80 The following terms are used in this guidance to shorten explanations of off-site arrangements:
- **application site** – the site of the proposed development that generates a policy requirement for housing under policy DP1 or affordable housing under policy DP3;



- **delivery site(s)** – one or more proposed development sites elsewhere intended to meet policy requirements off-site.

- 2.81 The paragraphs accompanying policies DP1 and DP3 indicate that where off-site provision is made, the overall percentage of housing/affordable housing and non-residential uses will be considered across the aggregate floorspace on all related development sites. In other words, the percentage requirement for an off-site contribution is calculated as a proportion of the floorspace at the application site and the floorspace at the delivery site(s) added together, rather than the application site alone. In the case of policy DP1, where there is a single target of 50% for negotiation of on-site contributions, off-site contributions should normally involve matching the non-residential floorspace increase at the application site with an equivalent increase in residential floorspace at the delivery site. In the case of policy DP3, where the sliding scale applies a formula is used to calculate off-site contributions. Figure 7 and Figure 8 below show how the off-site policy requirement can be calculated.
- 2.82 Calculating the percentage across floorspace on all related development sites helps to ensure that the policies do not provide an unintended incentive towards off-site contributions. Off-site contributions allow more non-residential floorspace (or market housing floorspace) to be developed at the application site. Considering the sites together ensures that this gain in non-residential floorspace (or market housing) also leads to a proportionate increase in residential floorspace (or affordable housing floorspace) at the delivery site.
- 2.83 Calculating the proportion across all related development sites also enables land swaps. A land swap enables a developer to offset additional non-residential floorspace (or market housing) at the application site by reducing non-residential floorspace (or market housing) elsewhere.
- Under DP1, redeveloping/ converting non-residential floorspace for off-site housing can be used to offset the addition of non-residential floorspace at the application site;
  - Under DP3, redeveloping/ converting market housing floorspace for off-site affordable housing can be used to offset the addition of market housing at application site.
- 2.84 A calculation of this type under policy DP1 is included in paragraph 1.16 of our Development Policies document and as Example 2 in Figure 7.

**Figure 7. Calculating off-site contributions under policy DP1**

Additional floorspace proposed	Generally under 1,000 sq m for off-site housing contribution to be considered
On-site housing target	50% of additional floorspace on the application site
Off-site housing target	50% of total additional floorspace (application site plus delivery site)
Housing floorspace required off-site	Should match total addition to non-residential floorspace across the related sites

**Example 1**

Additional floorspace proposed (application site)	= 800 sq m
Housing floorspace required if on-site (application site)	= 400 sq m
Remaining non-residential floorspace addition on-site (application site)	= 400 sq m
Non-residential floorspace addition if principle of off-site housing is agreed (delivery site, with no conversion of non-residential floorspace to housing elsewhere)	= 800 sq m
Housing floorspace required off-site (with no conversion of non-residential floorspace)	= 800 sq m
Ratio of non-residential floorspace to housing floorspace off-site	800:800 = 50%:50%

**Example 2**

Non-residential addition on-site (application site, where principle of off-site housing is agreed)	= 800 sq m
Housing floorspace required off-site (delivery site, with no conversion of non-residential floorspace)	= 800 sq m
Non-residential loss off-site through conversion to housing (delivery site)	= minus 400 sq m through conversion to housing
Net non-residential addition (all sites)	= 400 sq m
Net housing floorspace required off-site (by conversion of non-residential floorspace)	= 400 sq m
Ratio of non-residential floorspace to housing floorspace off-site	400:400 = 50%:50%

Figure 8. Calculating off-site contributions under policy DP3

Additional market housing floorspace proposed - 'a'	Generally under 3,500 sq m for off-site affordable housing contribution to be considered
On-site affordable housing target -'b' (percentage)	Varies according to the sliding scale for sites with capacity for less than 50 homes (NB the sliding scale does not apply where the primary application site also includes 1,000 sq m or more of additional non-residential floorspace – see paragraph 2.34 of this guidance).
Off-site affordable housing target (proportion)	$= b / (100 - b)$
Affordable housing required off-site (secondary delivery site) - 'c' (sq m)	$c = a \times b / (100 - b)$

**Example**

Additional market housing floorspace proposed	= 2,500 sq m
Target for on-site affordable housing	= 25% x 2,500 sq m = 625 sq m
Off-site affordable housing target	= 25 / (100 – 25) = 33.3%
Target for off-site affordable housing contribution	= 2,500 sq m x 33.3% = 833.3 sq m
Ratio of market housing floorspace to affordable housing floorspace off-site	2,500:833.3 = 75%:25%

- 2.85 Development Policies DP1 and DP3 indicate that we will take into account the economics and financial viability of development when considering off-site contributions as well as on-site contributions. The arrangements in paragraphs 2.60 to 2.68 of this guidance will apply, and applicants will need to submit financial viability appraisals to demonstrate that the application and delivery sites are providing the maximum reasonable contributions to housing (under DP1) or affordable housing (under DP3). Applicants will be required to fund an independent verification of the financial viability appraisal where the proportion or mix of housing/ affordable housing sought falls considerably short of the contributions anticipated by our Development Policies document and this guidance.
- 2.86 As indicated in paragraph 2.76 of this guidance, contributions to housing/ affordable housing should normally be made on site. Mechanisms guiding the delivery of housing and affordable housing should not create a financial incentive for the developer to make off-site contributions. Where the level of off-site contribution is below the level anticipated by our Development Policies document and this guidance,

we will seek to ensure the additional value created by the development is broadly the same with an off-site contribution as it would be with an on-site contribution. In addition to the financial viability appraisal requirements of paragraphs CPG22.60 to 2.68, the Council may therefore seek a comparison between the financial viability of on-site and off-site solutions (taking into account the existing use value and residual development value of the application site and delivery site).

### **Residential land-use credits and affordable housing credits**

- 2.87 Within Camden's Central London area there are a number of property investors and developers that own a significant number of sites. We may negotiate arrangements with such landowners to take advantage of commercial development opportunities, market housing opportunities and affordable housing opportunities on separate sites provided this does not compromise our objectives for mixed-use and mixed and balanced communities. In particular, owners of several sites may be able to bring forward developments of housing or affordable housing in advance of any policy requirement from Development Policies DP1 or DP3. In effect, the 'delivery site(s)' is/ are developed before the 'application site' has been identified (see paragraph 2.80 of this guidance for an explanation of these terms). The Council may agree to 'bank' this floorspace in the form of credits that can be accepted against the policy requirements from future development. When an 'application site' generates a housing/ affordable housing requirement, the Council will have discretion to agree to use of the 'banked' credits to offset part or all of the policy requirement.
- 2.88 The credits mechanism has potential to deliver additional housing and affordable housing earlier in the financial cycle by creating incentives for multiple site-owners to:
- seek opportunities for housing/ affordable housing development in advance during periods when commercial markets are poor rather than seeking to negotiate payments in lieu when commercial development prospects improve;
  - bring forward housing/ affordable housing development that they would otherwise hold back until commercial development prospects improve;
  - take up opportunities to convert lower value commercial properties to housing when leases expire;
  - provide affordable housing when the market for private housing would be unable to support it.
- 2.89 The mechanism can also help developers to deliver commercial floorspace or market housing more quickly when demand is strongest.
- 2.90 There are two types of credits that could be considered in this way:
- **residential land-use credits** – created where housing is provided but is not required by policy – these can be used where market

housing is needed to offset additional commercial development under Development Policy DP1; and

- **affordable housing credits** – created where affordable housing is provided in place of market housing but is not required by policy – these can be used where affordable housing is needed to offset additional market housing development under Development Policy DP3.

2.91 The two types of credit could potentially be created by a single development at the same time if affordable housing is provided but there is no policy requirement for any type of housing. However, each type of credit can only be used once and only against a single policy requirement.

2.92 Residential land-use credits and affordable housing credits are types of off-site contributions, and will be governed by the policy considerations set out in paragraph 2.76 to 2.79 of this guidance. Paragraphs 1.15 and 3.15 of our Development Policies document indicate that off-site contributions should be made in the same area as the application site. In the case of residential land-use and affordable housing credits, the Council will only agree to bank credits from development in the Central London area, and will only allow credits to be used to offset requirements on another site in Central London. Credits should be used in reasonable proximity to the delivery site. In the Central London context, in most cases the Council will require credits to be used within 500 metres of the delivery site, taking into account any demonstrable benefits from allowing provision on a more distant site. The Council will not agree to credit arrangements that would erode the mixed-use character of Central London or add to concentrations of affordable housing at the fringes of Central London.

2.93 The Council will use two mechanisms to ensure that residential land-use credits and affordable housing credits serve to increase the overall delivery of housing or affordable housing.

- The Council will not agree to the formation of credits from development of market housing or affordable housing where this development would clearly have arisen regardless of any future DP1/ DP3 requirements on other sites.
- Where we agree to the use of credits to off-set a housing requirement from additional non-residential space or an affordable housing requirement from additional market housing, the credit required will be equivalent in floorspace terms to the overall increase in non-residential floorspace – or market housing floorspace – across the application site and the delivery site(s) together, in accordance with the considerations set out in paragraphs 2.80 to 2.84 of this guidance.

2.94 The Council may therefore agree to acknowledge development in Central London as creating residential land-use credits and/ or affordable housing credits subject to the following constraints:

- the creation of credits should form part of the resolution to grant permission for housing/ affordable housing on the 'delivery site'
- the Council will only agree the formation of credits where this will serve to increase the overall delivery of housing or affordable housing
- the scale and type of credits created should be agreed at the time of the resolution on the 'delivery site' (floorspace of residential land-use credits and floorspace of affordable housing credits)
- at the request of the credit-holder, the Council may consider credits agreed by resolution as a material consideration offsetting policy requirements at a future 'application site' in Central London
- the Council will only accept the existence of credits as a material consideration where an off-site contribution would comply with Development Policies DP1, DP3 and all other relevant policies and material considerations
- the Council will only accept the existence of credits as a material consideration for sites in Central London
- the Council will require the credits to be used in reasonable proximity to the 'delivery site', and in most cases within 500 metres
- the Council will consider the scale of credits required to off-set a policy requirement in terms of the overall increase in non-residential floorspace increase or market housing floorspace across the application and delivery site(s) together
- the existence of credits will not place any obligation on the Council in terms of its decision-making in relation to a future 'application site'
- the period over which the credit can be applied to a future 'application site' should also be agreed at the time of the resolution on the 'delivery site', usually until 10 years from the date of the resolution
- the credits will generally be specific to an applicant, developer or landowner, and will not be regarded as transferable
- the Council will seek a S106 legal agreement to ensure that where development at an application site is justified by the existence of credits, the development cannot be occupied until the housing/ affordable housing that creates the credits is completed and available for occupation
- the creation and 'cashing-in' of credits and the implementation of development at 'delivery sites' and 'application sites' will be closely monitored and regularly reported.

### **Payments in lieu**

- 2.95 Development Policies DP1 and DP3 only allow payments-in-lieu of housing/ affordable housing in exceptional circumstances, and these will be governed by the policy considerations set out in paragraph 2.76 to 2.79 of this guidance. Payments-in-lieu may be accepted where the required housing/ affordable housing cannot practically be achieved on-site and the applicant demonstrates that no alternative site is available in the area (see paragraphs 1.17 and 3.15 of the Development Policies

document). Payments-in-lieu of housing will be paid into the Council's affordable housing fund whether they arise under policy DP1 or policy DP3, as the Council does not hold funds for investment in market housing.

- 2.96 Where development proposals involve a shortfall of the housing or affordable housing required under Policies DP1 or DP3, the Council may negotiate a payment in lieu of the unmet requirement.
- 2.97 Where the Council considers that a payment-in-lieu of housing/ affordable housing is appropriate under policies DP1 or DP3, we will calculate the payment-in-lieu in accordance with CPG on **Planning Obligations**. The calculation is based on viability research commissioned by the Council to set a standard affordable housing payment-in-lieu. In negotiating a payment-in-lieu, the Council will also take into account the economics and financial viability of the particular development. Where a payment-in-lieu at the level anticipated by CPG on Planning Obligations would not be viable, the arrangements in paragraphs 2.60 to 2.68 of this guidance will apply.
- 2.98 As indicated in paragraph 2.86, financial appraisal mechanisms should not create an incentive towards off-site solutions. In addition to the financial viability appraisal requirements of paragraphs 2.60 to 2.68, the Council may therefore seek financial viability appraisal of the development with and without an on-site contribution, and will seek to ensure that any payment-in-lieu is broadly equivalent to the increase in development value where no contribution is made on-site. The Council may also consider the cost of developing the required percentage of housing/ affordable housing off-site.

### **Background**

- The National Planning Policy Framework (NPPF) provides a definition of affordable housing and sets the framework which local councils use to secure affordable housing from market housing development.
- CLG guidance 'Delivering affordable housing' provides further information on delivery mechanisms that local councils can use to provide affordable housing.
- The London Plan and the Mayor's Housing SPG give guidance on the income groups who are eligible for intermediate housing, and also cap the cost of intermediate housing on the basis of income.
- The London Plan Annual Monitoring Report is used to review annually which income groups are eligible for intermediate housing.

## **Securing works / conditions / S106**

- 2.99 Provision of housing required under Development Policy DP1 will generally be secured by a planning obligation under S106 of the Town and Country Planning Act 1990. The precise terms of the S106 agreement will vary between developments to reflect the nature and financial viability of the development. In most cases S106 terms will include:
- identifying all homes in the development
  - preventing the occupation of non-residential floorspace until the housing is completed and available for occupation, including non-residential development justified by a residential land-use credit agreed in association with a housing development on another site.
- 2.100 Provision of affordable housing required under Development Policy DP3 will always be secured through a S106 planning obligation. The precise terms of the S106 agreement will vary between developments to reflect the nature and financial viability of the development. In most cases, S106 terms will include:
- identifying all affordable homes in the development
  - specifying which homes will be social rented housing and which homes will be intermediate housing
  - defining social rented housing in terms of the Government's national rent regime
  - defining intermediate housing in terms of the income groups and the ratio of housing cost to income contained in the London Plan, the Mayor's Housing SPG and the London Plan Annual Monitoring Report
  - defining affordable rented housing in relation to lower quartile market rents available locally and across the borough
  - identifying social rented and intermediate wheelchair homes
  - arrangements for the development, fitting out and transfer of the affordable housing to an affordable housing provider
  - preventing the occupation of some or all market housing until the affordable housing has been completed, fitted out and transferred to an affordable housing provider - including market housing justified by an affordable housing credit agreed in association with affordable housing development on another site
  - securing availability of the affordable housing to future eligible occupiers, or securing recycling of public subsidy if the affordable housing is sold.
- 2.101 Other S106 terms that may be required in connection with DP1 and DP3 include:
- where off-site delivery will be at a known site or sites, linking the developments together



- where a site is not identified for delivery at the outset, specifying the floorspace, nature of housing required and general location
- where a site is not identified for delivery at the outset, arrangements for identifying one or more delivery sites prior to the implementation of the development
- making a payment-in-lieu of housing/ affordable housing prior to implementation or occupation of the development
- arrangements for a deferred affordable housing contribution if provision of housing/ affordable housing falls significantly short of targets due to financial viability, and there is a prospect of viability improving prior to completion
- specifying the type of intermediate housing – e.g. key-worker, intermediate rent, shared ownership
- controls on the rents of intermediate rented housing and affordable rented housing
- limiting the minimum percentage share available in shared ownership homes
- limiting the rent charged on the unsold proportion of shared ownership homes.

## Resources / contacts

### Contacts

Guidance on interpretation of the LDF Core Strategy and Development Policies document	Strategic Planning and Implementation Team – 020 7974 5964 – or email <a href="mailto:LDF@camden.gov.uk">LDF@camden.gov.uk</a>
Guidance on our affordable housing priorities and our housing association partners	Camden Council Housing Commissioning and Partnerships Team – 020 7974 2743
Guidance on the pre-planning application advice service	<a href="http://www.camden.gov.uk/ppaa">www.camden.gov.uk/ppaa</a> Camden Council Duty Planner Service – Contact Camden - 020 7974 4444

### Resources

Affordable Housing Development Control Toolkit, GLA 2012	<a href="http://www.london.gov.uk/who-runs-london/mayor/publications/planning/affordable-housing-development-control-toolkit">www.london.gov.uk/who-runs-london/mayor/publications/planning/affordable-housing-development-control-toolkit</a> (see Mayor's Priorities - Planning – Publications - October 2012)
Camden Housing Needs Survey Update 2008	<a href="http://www.camden.gov.uk/ldf">www.camden.gov.uk/ldf</a> (see Evidence and Monitoring pages)
Camden Affordable Rent Study 2011	<a href="http://www.camden.gov.uk/housing">www.camden.gov.uk/housing</a> (see Housing Policies and Strategies – Social Housing Reform)
Delivering Affordable Homes – CLG guidance 2006	<a href="https://www.gov.uk/government/publications/delivering-affordable-housing">https://www.gov.uk/government/publications/delivering-affordable-housing</a> (see GOV.UK - Publications – Policy Papers – Housing - Department of Communities and Local Government – November 2006)
Housing Supplementary Planning Guidance, Mayor of London, November 2012	<a href="http://www.london.gov.uk/who-runs-london/mayor/publications/planning/housing-supplementary-planning-guidance">http://www.london.gov.uk/who-runs-london/mayor/publications/planning/housing-supplementary-planning-guidance</a> (see Mayor's Priorities - Planning – Supplementary Planning Guidance)
National Planning Policy Framework (NPPF), CLG 2012	<a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a> (see GOV.UK - Publications – Policy Papers – Planning and Building - Department of Communities and Local Government – March 2012)

### 3 Student Housing

#### KEY MESSAGES

The location and design of student housing should:

- Contribute to creating mixed and inclusive communities across the borough
- Serve higher education institutions in Camden or adjoining boroughs
- Provide a mix of unit types

- 3.1 This section provides detailed guidance on how the Council will manage the growth in student housing to ensure mixed and inclusive communities across Camden as outlined in Core Strategy policy CS6 – *Providing quality homes*, Development Policy DP2 – *Maximising the supply of housing* and Development Policy DP9 – *Student housing, bedsits and other housing with shared facilities*.
- 3.2 This guidance applies to all developments that provide student housing including new build, conversion and change of use. It specifically covers:
- location and concentration;
  - design and facilities;
  - cost and affordability;
  - safety & crime prevention; and
  - access.
- 3.3 Camden’s Core Strategy policy CS6 – *Providing quality homes* and Development Policy DP9 – *Student housing, bedsits and other housing with shared facilities* support the development of student housing subject to a number of criteria, including where it:
- will not involve the loss of permanent self contained homes;
  - does not prejudice the supply of self-contained homes, affordable housing and homes for vulnerable and older people;
  - complies with relevant houses in multiple occupation (HMO) standards (see further information below);
  - is accessible to public transport, higher education institutions, shops, services and community facilities; and
  - contributes to mixed and inclusive communities (Development Policy DP9).
- 3.4 Student housing development should also:
- serve higher education institutions in Camden or adjoining boroughs;
  - be located where it is accessible to the institution it serves; and
  - include a range of unit layouts including units with shared facilities (Development Policy DP9).

## What issues will the Council consider?

### Location and Concentration

- 3.5 The creation of mixed and inclusive communities is an important factor when considering where student housing should be located. Camden acknowledges the contribution higher education institutions and their students make to the economy and to the social mix of an area. However, student housing is often associated with a concentration of relatively short term residents who, by reason of their particular social needs, the unique nature of activity associated with student life and demand for facilities and services can have an unwelcome impact on an established community.
- 3.6 Core Strategy policy CS6 and policy DP9 of the Development Policies support student housing proposals subject to several criteria, including that proposals should not prejudice the supply of self-contained homes, or involve the loss of sites particularly suitable for affordable housing or housing for older or vulnerable people. Development Policy DP2 also resists alternative development of sites particularly suitable for housing, affordable housing or housing for older or vulnerable people.
- 3.7 The Council will resist proposals for student housing developments that would prevent us from meeting the Council's target for delivery of 437 additional self contained homes per year.
- 3.8 The Council will consider the suitability of any site for alternative housing, particularly if it has been identified as one which is suitable for affordable housing or housing for older or vulnerable people. The Council will have regard to:
- the Camden Site Allocations Document; and
  - extant planning permissions that have already secured permanent C3 accommodation.
- 3.9 Camden is home to 11 HEFCE funded Higher Education Institutions (HEIs). A list of HEFCE funded Camden based HEIs can be found at Appendix C. Student housing development should serve a higher education institution based in Camden or one of its adjoining boroughs.
- HIGHER EDUCATION FUNDING COUNCIL FOR ENGLAND (HEFCE)**  
This body distributes public money for teaching and research to universities and colleges. In doing so, it aims to promote high quality education and research. HEFCE also plays a key role in ensuring accountability and promoting good practice.
- 3.10 Student housing should be located in areas that are accessible to the institutions they serve. We will have regard to the distances students have to travel from their accommodation to their place of study. We will expect student housing to be located within walking or cycling distance of the institution(s) it serves, or to be accessible by public transport services that have existing or committed capacity to accommodate the

demand generated. Student accommodation should be located no more than a 20 minute walk or cycle away from their place of study.

- 3.11 Student populations are often highly dependant on local public transport routes. Proposals for student housing will be assessed against the adequacy of the local transport provision, including whether there:
- is sufficient capacity on bus and underground routes;
  - are adequate walking and cycle routes; and
  - is adequate provision for servicing.
- 3.12 When considering the location of student housing schemes, the Council will also have regard to:
- existing concentrations of student accommodation in the area as a proportion of the overall population;
  - the wider housing mix in the community; and
  - the impact on residential amenity in the area.
- 3.13 A map outlining the existing concentrations of students across Camden can be found at Appendix A. This map refers to individual schemes and closely grouped developments of 100 bed spaces or more and includes existing halls of residence and proposed student housing with valid planning consent. The Council is aware of numerous smaller sites providing student housing.
- 3.14 When considering the concentrations of students in a single area the Council will have regard to:
- the character of the area (in particular whether the area is of a residential nature);
  - the existing mix of uses; and
  - in particular the impact on any permanent residential occupiers.
- 3.15 The Council will use Census data and records of recent permissions for student housing in the area when assessing the acceptability of concentrations in student housing.
- 3.16 Where proposals for student housing are likely to disturb the balance of the community because of their scale or because of an existing concentration, the Council may seek the provision of self-contained general needs housing on part of the site, including affordable housing, in line with the priorities identified in Core Strategy policies CS1 and CS6 and Development Policy DP2. We will consider schemes on a site by site basis having regard to:
- Census information;
  - Camden's Annual Monitoring Report; and
  - Permissions for student housing schemes in the area.
- 3.17 A table outlining the number of full time students in Camden as a proportion of the overall population by ward is shown at Appendix B.

- 3.18 As outlined above student housing schemes will be considered on a site by site basis, taking into account the specific circumstances of each individual case. As a broad guide the Council will consider the following, alongside the site specific implications of any scheme:
- Where there is an existing concentration of resident students, the Council considers that proposals for student housing may harm the mix and balance of the community if they provide more than 100 bed spaces.
  - Where there is no existing concentration of resident students, the Council considers that proposals for student housing may harm the mix and balance of the community if they provide more than 250 bed spaces.
- 3.19 In some instances it may be appropriate to allow additional student housing schemes in locations where there is an existing concentration of such accommodation. Camden Development Policy DP1 and supporting paragraph 1.9 indicate that where a development adds floorspace of 200 sq m (gross) or more in Central London (excluding Hatton Garden), up to 50% of additional floorspace should be permanent self-contained housing in Use Class C3. However, paragraph 1.9 also notes that where the additional floorspace is provided for an educational institution supported by HEFCE the Council may accept student housing that serves the same institution as an alternative to self-contained housing. Student housing provided in this context should:
- form part of a mixed use development;
  - be located on a site already owned by the HEFCE institution or a provider with an agreement for nominations; and
  - be in close proximity to the institution it serves.
- 3.20 The Council will consider this on the basis that additional accommodation will not:
- exacerbate the existing balance of the student population in the area;
  - place additional demand on public transport;
  - increase the impacts on existing permanent residential communities.

### **Design & Facilities**

- 3.21 To ensure a range of accommodation is available within student housing schemes, including accommodation that will be attractive to groups who would otherwise share private rented accommodation, the Council will expect student housing developments to include a range of:
- clustered study bedrooms with some shared facilities;
  - double units (often suited to post-graduate students); and
  - single units.

- 3.22 The provision of a variety of layouts will also allow for greater flexibility for conversion to permanent self-contained housing if in future the building is no longer needed as student accommodation.
- 3.23 In addition to the basic amenities expected from student accommodation such as washing and cooking facilities, the Council will expect to see common rooms/lounge areas to be provided as part of any development.
- 3.24 For new student housing schemes provided by HEFCE institutions, the Council will also expect development to comply with the Accreditation Network UK (ANUK) 'Code of Standards for Larger Developments' (<http://www.anuk.org.uk/LargeCode/Introduction.asp>). Other student housing schemes are to comply with the Council's HMO standards.

### **Cost & Affordability**

- 3.25 Student housing has the potential to mitigate pressure on the stock of private rented homes in Camden. However, this will only happen if the accommodation provided is genuinely aimed at higher education students in the area. The Council will use design mechanisms (such as seeking cluster flats), conditions or legal agreements, as appropriate to:
- prevent the lease or sale of student accommodation as general market housing,
  - limit term time occupation to students registered at HEFCE funded higher education institutions within Camden or adjoining boroughs, or other institutions as agreed on a case by case basis by the Council
  - control the length of stays (i.e. when more than 90 days) to ensure that any new accommodation can not be used as short term let accommodation.

#### **SHORT TERM LETS:**

Accommodation let for periods of less than 90 days as defined by the amended Greater London Council (General Powers) Act 1973.

- 3.26 To ensure new student housing is genuinely attractive to students currently within the private rental market (as outlined in paragraph 9.10 of the Camden Development Policies), the Council will resist schemes that have not identified which institution the students occupying the proposed accommodation will attend.
- 3.27 In line with the above, the Council will seek:
- that the accommodation is operated directly by a Camden based (or adjoining borough) HEFCE funded higher education institution; or
  - a nominations agreement is in place with a specific HEFCE funded institution(s) which ensures that the institution(s) controls admission to the accommodation. In this regard it is important for private providers to have early discussions with HEFCE institutions to ensure the accommodation is designed and built to meet their needs and requirements.

### **Safety & Crime Prevention**

- 3.28 The Council will expect any scheme for student housing to incorporate design measures that promote personal safety and security and reduce crime and the fear of crime, taking into account the Secured by Design principles. Applicants should discuss any scheme with the Metropolitan Police's Crime Prevention Design Advisor at the pre application stage.

#### **SECURED BY DESIGN:**

Focuses on crime prevention at the design, layout and construction stages of homes and commercial premises and promotes the use of security standards for a wide range of applications and products.

- 3.29 Design measures may include:
- communal functions placed at the ground floor of the building to retain an active frontage;
  - card-operated access control at a main entrance gate;
  - audio-visual CCTV to increase the level of surveillance;
  - alarmed fire escape doors; and
  - on-site accommodation management.
- 3.30 All internal design and management features are to be included within a submitted Student Management Plan, secured via legal (S106) agreement (see below).

### **Access**

- 3.31 Paragraph 6.6 of Camden Development Policies which requires 10% of housing within any development to be made wheelchair accessible applies. We will expect 1 in 10 student bedrooms to be fully wheelchair accessible, or capable of being fully wheelchair accessible (see Lifetime Homes and Wheelchair Housing guidance).

### **Use of conditions and legal agreements in student housing schemes**

#### **Student Management Plan**

- 3.32 A Student Management Plan is to be submitted with any planning application to ensure student welfare and to mitigate the potential impacts of the development on the local community. The Student Management Plan should include details of safety and crime prevention and a 'Code of Conduct'. This shall include details on:
- health and safety standards and procedures;
  - maintenance and repairs;
  - environmental quality;
  - landlord and tenant relationship;
  - student welfare;



- anti-social behaviour and disciplinary procedures; and
- administration, accreditation and compliance procedures.

3.33 With regards to anti-social behaviour, the Student Management Plan should describe a 'student tenancy agreement' including conditions to ensure that students are responsible in their behaviour to respect fellow residents, neighbours and the building, in order to prevent anti-social behaviour. The management plan should describe how the owners will enforce the terms and conditions of the tenancy. Any such plan can build upon any code of conduct provisions set out by the Institution to which the students belong.

3.34 In line with the guidance detailed above the Council will also seek to secure through the S106 agreement:

- the link to a Camden (or adjoining borough) HEFCE-funded institution(s);
- the permanent occupation as student housing; and
- a nominations agreement, or direct operation by a Camden based HEFCE funded HEI.

### **Energy & Water**

3.35 Given that students generally pay a flat service charge for utilities the Council will expect the development to incorporate measures to minimise carbon dioxide emissions in accordance with Camden Core Strategy policy CS13 by minimising energy and water consumption through measures such as:

- metering electricity, heat and water use;
- incorporating energy and water efficient measures such as timers, sensors, flow restrictors, individual controls and energy efficient light bulbs;
- A and A\* rated appliances; and
- means of monitoring and feedback/education of occupiers on water and electricity usage.

### **Community Facilities**

3.36 In line with Camden Development Policy DP15, the Council will seek to ensure that any developments that result in any additional need for community, leisure or open space facilities contribute to such facilities in the area. The Council will make an assessment based on:

- the number of student units provided;
- the provision of any on-site community, leisure or open space facilities;
- the provision of any community, leisure or open space facilities provided by the higher education institution the students attend; and
- any identified deficiencies identified in the area.

- 3.37 Where provision of facilities likely to be used by students is inadequate in the local area, we will seek a financial contribution to be used to provide or improve these types of community, leisure or open space facilities in the vicinity of the development.

#### Further information

URS Student Housing in Camden Study (October 2009)	Provides information on existing provision of student housing in Camden and the pipeline of future developments. <a href="http://www.camden.gov.uk/ldf">www.camden.gov.uk/ldf</a> (see Evidence and Monitoring pages)
Census 2001	Provides population figures outlining how many students in full time occupation as a proportion of overall population by Ward.
Camden Annual Monitoring Report	Provides details of housing completions (including student housing) by year. <a href="http://www.camden.gov.uk/ldf">www.camden.gov.uk/ldf</a> (see Evidence and Monitoring pages)
HMO standards	<ul style="list-style-type: none"> <li>• Accreditation Network UK (ANUK) 'Code of Standards for Larger Developments' <a href="http://www.anuk.org.uk/LargeCode/Introduction.asp">www.anuk.org.uk/LargeCode/Introduction.asp</a> (accessed April 2011)</li> <li>• Camden HMO Standards <a href="http://www.camden.gov.uk/housing">www.camden.gov.uk/housing</a> (see Private Sector Housing/ Private Housing Standards pages)</li> <li>• Secure by Design <a href="http://www.securedbydesign.com">www.securedbydesign.com</a></li> </ul>



## Appendix B

### Full-Time Higher Education Students and Population by Ward

	All resident full-time students age 19 or over 2001*	Share of all Camden resident full-time students age 19 or over 2001*	Usual resident population 2001*	Full-time students age 19 or over as a percentage of usual resident population 2001*	No of resident full-time higher education students 2010/11#	Share of all Camden resident full-time higher education students 2010/11#	Usual resident population 2011 <sup>+</sup>	Full-time students age 19 or over as a percentage of usual resident population 2011
LB Camden	15,690	100.0%	198,020	7.92	23,495	100.0%	220,338	[Figures will be added when the relevant Census data becomes available]
Belsize	720	4.6%	11,653	6.18	645	2.7%	12,702	
Bloomsbury	2,341	14.9%	9,224	25.38	4,370	18.6%	10,892	
Camden Town with Primrose Hill	606	3.9%	11,574	5.24	855	3.6%	12,613	
Canteloves	827	5.3%	10,490	7.88	1,795	7.6%	11,925	
Fortune Green	525	3.3%	10,465	5.02	585	2.5%	11,740	
Frognaal and Fitzjohns	882	5.6%	11,632	7.58	820	3.5%	11,986	
Gospel Oak	539	3.4%	10,465	5.15	515	2.2%	11,264	
Hampstead Town	550	3.5%	10,617	5.18	480	2.0%	11,270	
Haverstock	642	4.1%	11,224	5.72	1,000	4.3%	12,364	
Highgate	417	2.7%	10,492	3.97	415	1.8%	10,955	
Holborn and Covent Garden	1,017	6.5%	10,645	9.55	1,725	7.3%	13,023	
Kentish Town	646	4.1%	11,462	5.64	855	3.6%	13,417	
Kilburn	470	3.0%	10,494	4.48	580	2.5%	12,038	
King's Cross	2,622	16.7%	11,413	22.97	3,755	16.0%	11,843	
Regent's Park	1,035	6.6%	11,964	8.65	2,090	8.9%	13,528	
St Pancras and Somers Town	637	4.1%	12,490	5.10	1,595	6.8%	13,818	
Swiss Cottage	686	4.4%	11,663	5.88	755	3.2%	12,900	
West Hampstead	555	3.5%	10,053	5.52	665	2.8%	12,060	

\* 2001 Census © Crown Copyright, source tables (Borough and Ward level): ST063 - Economic activity and age of full-time students by and household type and tenure - figures for student numbers include both school pupils and Higher Education students, therefore the table uses figures for students age 19 or over; KS01 - Usual resident population; ST001 - Age by sex and type of resident. Cells in the source tables have been randomly adjusted by ONS to avoid the release of confidential data.

<sup>+</sup> 2011 Census Key Statistics and Quick Statistics, ONS © Crown Copyright, Open Government Licensed.

<sup>#</sup> HESA © 2012 (restrictions apply) - figures in this table are rounded to the nearest 5.

## Appendix C

### List of Camden based HEFCE-funded Higher Education Institutions (HEI's)

	Institution	Location
1	Birkbeck College (University of London)	Bloomsbury WC1E 7HX
2	Central School of Speech and Drama (University of London)	Swiss Cottage NW3 3HY
3	Conservatoire for Dance and Drama	Bloomsbury WC1H 9JJ
4	Institute of Education (University of London)	Bloomsbury WC1H 0AL
5	London School of Hygiene and Tropical Medicine (University of London)	Bloomsbury WC1E 7HT
6	Royal Veterinary College (University of London)	Camden Town NW1 0TU
7	School of African and Oriental Studies (University of London)	Bloomsbury WC1H 0XG
8	School of Pharmacy (University of London)	Bloomsbury WC1N 1AX
9	University College London (University of London)	Bloomsbury WC1E 6BT
10	University of London (School of Advanced Study)	Bloomsbury WC1B 5DN
11	University of the Arts	King's Cross Central & Holborn, WC1



## 4 Residential development standards

### KEY MESSAGE

Development should provide high quality housing that provides secure, well-lit accommodation that has well-designed layouts and rooms.

- 4.1 This guidance relates to Camden Core Strategy policies CS5 – *Managing the impact of growth and development*, CS6 – *Providing quality homes* and CS14 – *Promoting high quality places and conserving our heritage* plus Camden Development Policy DP26 – *Managing the impact of developers on occupiers and neighbours*. In addition, homes of all tenures should meet lifetime homes standards in accordance with Development Policy DP6 and the CPG on Lifetime homes and wheelchair housing.

### TENURE

Describes the ownership of a home and the relationship between a household and their home i.e. owner-occupied, shared ownership, private rented, social rented, etc.

- 4.2 The '**Access for all**' section in CPG6 **Amenity** sets out the Council's approach to providing buildings and spaces that are accessible to everyone. Reference should also be made to the **Design Excellence** section of CPG1 **Design** and to other sections of CPG2 **Housing**.
- 4.3 The space standards in this guide are minimum requirements and should not be taken as maxima. Housing which exceeds the minimum standards will always be encouraged.
- 4.4 This guidance applies to planning applications involving the provision of residential accommodation and residential conversions, extensions and change of use. In cases involving residential conversions of listed buildings a sensitive and imaginative approach to achieving these standards may need to be taken.

### MAYOR'S HOUSING SPG

The Mayor has prepared a draft replacement housing SPG. The Mayor's draft SPG supports the emerging replacement London Plan, which makes provision for residential standards to be applied across all tenures of development. Both the draft replacement London Plan and the draft replacement Housing SPG are expected to be adopted in autumn 2011.

In addition, we anticipate that housing with public subsidy in London will have to comply with the Mayor's London Housing Design Guide from April 2011 (published in interim form in August 2010). The Mayor is seeking to adopt the London Housing Design Guide standards for all housing tenures in London through the London Plan.

- 4.5 Camden's Core Strategy indicates that we will seek a range of self-contained homes to meet identified dwelling size priorities. These

priorities are set out in detail in our Development Policies document – see particularly policy DP5 and paragraph 5.4.

## **Guidance on residential development standards**

### **General principles**

- 4.6 All residential developments in the Borough are required to be designed and built to create high quality homes:
- All newly created dwellings for households of 2 or more people should be self-contained (applies to homes in Use Class C3, but does not apply to care homes for elderly or vulnerable people, student housing, bedsits, or other Houses in Multiple Occupation (HMOs)).
  - Each dwelling should have its own secure private entrance which leads either directly from the street or off a common entrance hall – the number of entrances off one corridor should be limited.

#### **SELF-CONTAINED**

Accommodation with its own kitchen, bathroom and toilet for the sole use of occupants behind a separate front door.

#### **HOUSES IN MULTIPLE OCCUPATION (HMO)**

HMOs are flats or houses permanently occupied by more than one household, where each household does not have exclusive access to all cooking, washing and toilet facilities behind a locked front door.

### **Layout**

- 4.7 There should usually be a permanent partition between eating and sleeping areas. Kitchens and living rooms that are permanently separated are preferable. However, combined kitchen and living areas are considered acceptable as long as the floor area is sufficient to allow for the greater range of activities that will take place in them.

### **Rooms**

- All rooms should be able to function for the purpose for the purpose for which they are intended.
- They should have an adequate size, shape, door arrangement, height, insulation for noise and vibration and natural lighting and ventilation.
- They should lead off a hallway or lobby so that it is possible to access any habitable room without passing through another habitable room, although Building Regulations Part B - Fire Safety allow inner rooms provided they meet certain criteria.

#### **HABITABLE ROOM**

A room that is capable of being used as primary living space. Generally consists of living rooms, dining rooms, large kitchen/diners and large bedrooms



### **Flexible construction/layout**

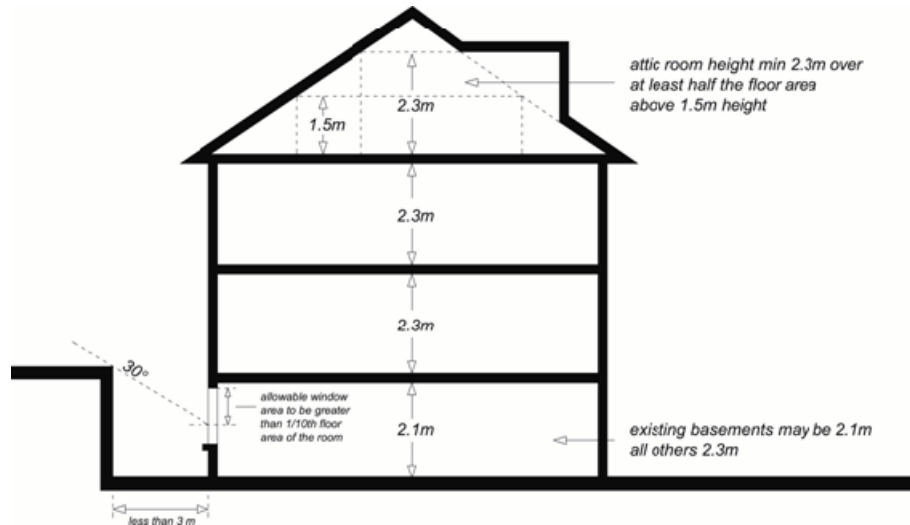
- 4.8 In addition, wherever practical dwellings should be designed to enable greater flexibility in construction design so that they can be capable of some form of extension or adaptation in order to accommodate changing lifestyles and family needs or other social use.
- 4.9 For example design features that could be considered, include:
- open plan layouts or generic layouts/floor plans;
  - avoiding load bearing internal walls;
  - easily accessible services and utilities e.g. a central accessible core or accessible floor/ceiling cavity.
  - For further examples see: By design urban design in the planning system: towards better practice: [www.communities.gov.uk/publications/planningandbuilding/bydesignurban](http://www.communities.gov.uk/publications/planningandbuilding/bydesignurban) by DETR (2000) (accessed April 2011).

### **Internal space standards**

#### **Ceiling heights**

- 4.10 All habitable rooms should have minimum headroom of 2.3 metres. The exceptions are habitable rooms in existing basements, which may have 2.1 metres headroom, and habitable rooms in attics which should have a minimum room height of 2.3 metres over at least half of the floor area (not including any floor space where the ceiling height is less than 1.5 metres). See Figure 10.
- 4.11 Any floor area where the ceiling height is less than 1.5 metres will not count towards the habitable floorspace. We will also consider the suitability of floor to ceiling heights in relation to context of building and how size of windows and floor to ceiling heights impact design. Please also refer to CPG1 **Design** (see particularly the sections on '**Design Excellence**' and '**Roofs, terraces and balconies**') and CPG4 **Basements**.

Figure 10. Ceiling heights and natural light for basements



### Space and room sizes

- 4.12 Although planning cannot control the precise internal layout of individual proposals, it is important to ensure that dwellings are capable of providing a suitable layout and adequate room sizes that reflect the use and type of accommodation. The Council will be flexible in the application of these guidelines in order to respond to site-specific circumstances.
- 4.13 The Council has set minimum space standards to ensure rooms are large enough to take on varying uses. Space standards relate to the occupancy of a home rather than number of bedrooms and the developer will be required to state the number of occupants each dwelling has been designed to accommodate. The occupancy of housing at the time of its first occupation is not a reliable prediction of future levels of occupancy over the lifetime of a home. The only sensible assessment of occupancy is therefore the designed level of occupancy.
- 4.14 The overall internal floorspace in new self-contained dwellings (excluding communal lobbies and staircases) should normally meet or exceed the minimum standards set out in the following table.

Number of Persons	1	2	3	4	5	6
Minimum floorspace (sq m)	32	48	61	75	84	93

- 4.15 For dwellings designed for more than 6 people, allow approximately 10sq m. per extra person. In order to successfully to provide ease of movement and storage space for wheelchair users, the council will normally wheelchair housing dwellings to exceed the minimum floorspace standards. Please also refer to the section on 'Lifetime homes and wheelchair housing' in this CPG document.
- 4.16 The Council will expect bedrooms to meet or exceed the following minimum sizes:

- First and double bedrooms - 11.0 sq m
- Single bedrooms - 6.5 sq m

4.17 The Council's Private Sector Housing Team has produced specific minimum standards for Houses in Multiple Occupation (HMO's) and hostels which includes guidance on room sizes and facilities. Schemes for bedsits, shared houses and flats and hostels should be prepared with reference to these standards. These can be viewed on Camden's website [www.camden.gov.uk/housing](http://www.camden.gov.uk/housing) (see Private Sector Housing/ Private Housing Standards pages).

4.18 Self-contained homes providing a floorspace below the minimum standards may be considered in exceptional circumstances, for example to reduce the cost of Intermediate Housing to the occupier, however their acceptability will depend on other aspects of the development proposed. Sympathetic consideration may be given where a proposal meets a number of the criteria below:

- Dwellings are targeted at, and affordable to, groups identified by the Borough as being in need.
- External amenity space is provided
- A limited number of dwellings are accessed from each entry point and corridor (ideally 8 or fewer, unless controlled by a concierge or a CCTV system allowing clear facial identification).
- Security controlled access is provided where a larger number of units are accessed from one point.
- Where cluster flats are provided in response to a demonstrable demand (i.e. there are good indications that properties will not be hard to let to the targeted tenants), a limited number of flats are clustered into each dwelling (ideally 8 or fewer) (cluster flats are bedsits with a communal kitchen/eating area).
- A laundrette or communal laundry is provided (sufficient to cater for forecast resident demand at periods of peak usage) where individual dwellings cannot accommodate a washing machine - subject to keeping service and management charges at an acceptable level. The Council will take into account any existing commercial laundrettes that would be convenient for residents.

#### **Storage and utility spaces**

4.19 All accommodation should have sufficient internal storage space to meet the likely needs and requirements of potential occupiers. Dwelling layouts should make suitable provision:

- for washing machines and drying clothes;
- a storage cupboard with a minimum floor area of 0.8 sq m should be provided for 1- and 2-person dwellings;
- for each additional occupant, a minimum of 0.15 sq m storage area should be provided;

- storage for bicycles and prams should also be provided, located at the ground or lowest level of the dwelling, preferably accessed from a hall or lobby area;
- for waste and recycling bins, reference should also be made to the section '**Waste and Recycling Storage**' in CPG1 **Design**.

### **Daylight, sunlight and privacy**

- 4.20 Residential developments should maximise sunlight and daylight, both within the new development and to neighbouring properties whilst minimising overshadowing or blocking of light to adjoining properties. Maximising sunlight and daylight also helps to make a building energy efficient by reducing the need for electric light and meeting some of the heating requirements through solar gain. The orientation of buildings can maximise passive solar gain to keep buildings warm in winter and cool in summer.

#### **PASSIVE SOLAR GAIN**

Design to optimise the amount of the sun's energy that heats and lights a building naturally.

- 4.21 All habitable rooms should have access to natural daylight. Windows in rooms should be designed to take advantage of natural sunlight, safety and security, visual interest and ventilation. Developments should meet site layout requirements set out in the Building Research Establishment (BRE) Site Layout for Daylight and Sunlight – A Guide to Good Practice (1991).
- 4.22 Overall the internal layout design should seek to ensure the main living room and other frequently used rooms are on the south side and rooms that benefit less from sunlight (bathrooms, utility rooms) on the north side. Kitchens are better positioned on the north side to avoid excessive heat gain.

#### **Minimum requirements:**

- 4.23 In particular the following minimum requirements need to be met to avoid the unacceptable loss of daylight and/or sunlight resulting from a development, including new build, extensions and conversions. For example:
- Each dwelling in a development should have at least one habitable room with a window facing within 30 degrees of south in order to make the most of solar gain through passive solar energy;
  - Rooms on south facing walls should always have windows, south facing windows and walls should be designed, sized and/or shaded in summer to prevent overheating. Appropriate shading might be achieved by:
    - mature deciduous trees located so as to shade the structure
    - eaves or overhangs that protect from sun that is high in the sky only

- external shutters or blinds that can be operated by the occupant;
- External shading should be provided for western facing windows and outdoor spaces to minimise overheating in summer. Deciduous trees provide the best shade for this purpose;
- Windows on north facing walls should be sized to prevent heat loss but allow sufficient daylight;
- All habitable rooms, including basements, must have an external window with an area of at least 1/10 of the floor area of the room;
- An area of 1/20 of the floor area of the room must be able to be opened to provide natural ventilation;
- Windows to atriums will be acceptable as external windows in exceptional circumstances only;
- Passive ventilation should be favoured where possible and mechanically assisted ventilation should be silent in operation.

4.24 For further guidance reference should be made to 'The Code for Sustainable Homes' which provides technical guidance on designing for adequate internal daylighting and requires daylight levels to be calculated using the BRE assessment method. Reference should also be made to CPG3 **Sustainability**.

#### **Privacy and security**

- 4.25 House and flat developments should be arranged to safeguard the amenity and privacy of occupiers and neighbours.
- New development, extensions, alterations and conversions should not subject neighbours to unacceptable noise disturbance, overlooking or loss of security.
  - Developments should seek to improve community safety and crime prevention. This may include:
    - designing developments so that open spaces are overlooked by windows, avoiding dark secluded areas and buildings face onto streets.
    - obtaining Secured by Design certification – please refer to the '**Designing safer environments**' section of CPG1 **Design**.

#### **Basements**

- 4.26 All rooms within a basement should be able to function for the purpose of which they are intended. They should have an adequate size, shape, door arrangement, and height, insulation from noise and vibration, and access to natural lighting, ventilation and privacy (similar to the standards set out above). Four key considerations are set out here.
- Natural light - to ensure that adequate natural light is provided to habitable rooms, walls or structures (including the sides of lightwells) should not obstruct windows by being closer than 3 metres. Where

this is not achievable, a sufficient proportion of the glazing should be above the point on the window(s) from which a line can be drawn at 30° above the horizontal to pass the top of obstruction. The glazed area above the point should total not less than 10% of the floor area of the room. See Figure 10.

- Forecourt parking – nearby vehicles can also restrict light to basements, and consideration should be given to any further obstruction from vehicles parked on the forecourt that may present a barrier to light serving basement windows.
- Means of escape - basements should be provided with either a door or suitably sized window allowing access to a place of safety that gives access to the external ground level, or with a protected escape route within the building leading to a final exit at ground level.
- Lightwells - stairs, ladders and gates in any railings around a lightwell that are required for means of escape should be designed to be as discreet as possible and should have regard to the character of the building and surrounding area.

4.27 Further detailed guidance on basements is contained within CPG4 **Basements**.

### **Noise and soundproofing**

4.28 The layout and placement of rooms within the building should be carefully considered at an early stage in the design process to limit the impact of external noise on bedrooms and living rooms. The impact of noise should also be considered in the placement of private external spaces. Detailed guidance is provided in the '**Noise and vibration**' section of CPG6 **Amenity** and . The following requirements must be met.

- Internal layouts of dwellings should be designed to reduce the problem of noise disturbance between adjoining properties by using 'vertical stacking', i.e. placing living room above living room and bedrooms above bedrooms etc.
- Bedrooms should not be placed above, below or next to potentially noisy rooms, circulation areas of adjacent dwellings or noisy equipment, such as lifts.
- Windows should be located away from busy roads and railway lines/tracks to minimise noise and pollution and vibration.
- The layout of adjacent dwellings and the location of lifts, plant rooms and circulation spaces should seek to limit the transmission of noise to sound sensitive rooms within dwellings.
- Party walls and floors of flats created by conversion must be adequately soundproofed.
- All housing should be built with acoustic insulation and tested to current Building Regulations standards, but acoustic insulation should not be relied upon as the only means of limiting noise.

- Minimum levels of soundproofing are set out in the Building Regulations Part E - Resistance to the passage of sound. Levels of sound insulation above the minimum are encouraged.
- Further advice is given in the London Plan SPG on Sustainable Design and Construction

### **Outdoor amenity space**

4.29 Outdoor residential amenity space can be provided in the form of private garden space, balconies, terraces, roof gardens or as communal amenity space. Where practical the following requirements should be met.

#### **Private outdoor amenity space:**

- All new dwellings should provide access to some form of private outdoor amenity space, e.g. balconies, roof terraces or communal gardens.
- Private gardens should be allocated to family dwellings.
- Where provided, gardens should receive adequate daylight, even in the winter.
- The access to private amenity space should be level and should be from the main living space.
- Balconies should have a depth of not less than 1.5 metres and should have level access from the home.
- Balconies and terraces should be located or designed so that they do not result in the loss of privacy to existing residential properties or any other sensitive uses.
- Balconies should preferably be located next to a dining or living space and should receive direct sunlight (they can be designed to project from main building line or be recessed).

4.30 In some instances, it is accepted that existing buildings may not be able to provide balconies or roof terraces, however, external amenity space i.e. access to communal gardens should still be provided where possible. See CPG1 **Design** for further guidance on '**Roofs, terraces and balconies**'.

#### **Communal amenity space:**

- Space should meet the requirements of the occupiers of the building and be wheelchair accessible. For example, if there are a large proportion of family units, child and young person's facilities should be included in the communal space. The council will use the Mayor of London's 'Providing children's and young people's play and informal recreation SPG' (March 2008) when calculating requirements: <http://static.london.gov.uk/mayor/strategies/sds/spg-children-recreation.jsp> (accessed April 2011).
- Space should be well designed so that residents have a sense of ownership of the space, which will encourage its use.

- Space should be located sensitively so that it is overlooked by surrounding development and secure for residents.
- Space should be designed to take advantage of direct sunlight.
- Space should be designed to minimise disturbance to occupiers and neighbours, e.g. by being sheltered from busy roads, by being located in the rear of the buildings, back to back, behind perimeter blocks or in courtyards.
- Landscaping and facilities provided for the space should be of a high quality and have suitable management arrangements in place.

### Further information

GLA Housing Design Guide	The Mayor's London Housing Design Guide from April 2011 (August 2010) provides detailed guidance on housing design in London <a href="http://www.london.gov.uk/who-runs-london/mayor/publications/housing/london-housing-design-guide">http://www.london.gov.uk/who-runs-london/mayor/publications/housing/london-housing-design-guide</a> (accessed April 2011)
Lifetime Homes and Wheelchair Housing Standards	In addition to the above residential standards, most residential schemes will also need to meet specific requirements for Lifetime Homes and Wheelchair Housing Standards: <ul style="list-style-type: none"> <li>• For further guidance on how to meet Camden's requirements refer to CPG on Lifetime homes and wheelchair housing.</li> <li>• For good practice guidance specifically on Lifetime Homes <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a></li> </ul>
Daylight and Sunlight	For good practice advice on overshadowing and providing daylight and sunlight to buildings, refer to the widely used BRE Report "Site Layout Design for Daylight and Sunlight; a guide to good practice". It provides specific guidance on: <ul style="list-style-type: none"> <li>• Providing good daylighting and sunlighting within a new development</li> <li>• Safeguarding sunlight and daylight within existing buildings nearby</li> <li>• Protection of daylighting of adjoining land for future development</li> <li>• Passive solar site layout</li> <li>• Sunlighting of gardens and amenity areas</li> </ul>
Sustainability	The Council will require all that all buildings are designed to be sustainable, thus reference should also be made to CPG3 <b>Sustainability</b> , in particular, the 'Code for Sustainable Homes' sub-section in 'Sustainability assessment tools'.



## 5 Lifetime Homes and Wheelchair Housing

### KEY MESSAGES

- All residential development should meet the 16 criteria that form the Lifetime Homes standards.
- The standards will be applied flexibly to existing buildings, but applicants should justify failure to meet any of the criteria.
- 10% of market housing development should meet wheelchair housing standards, or should meet the 13 key Habinteg wheelchair housing criteria so that they can be easily adapted to meet wheelchair housing standards.
- 10% of affordable housing development should be designed, built and fitted out to meet Wheelchair Housing standards in full.

### What does this section cover?

- 5.1 This section provides advice on how proposals can made be accessible to all by incorporating “lifetime home” standards and creating wheelchair accessible homes. It supplements Camden Development Policies policy DP6 – *Lifetime homes & wheelchair housing*, as well as DP29 – *Improving Access* and Camden Core Strategy policy CS6 - *Providing quality homes*.
- 5.2 In line with policy DP6 all new residential development will be expected to meet the following standards.

#### LIFETIME HOMES

All housing developments should meet lifetime homes standards. A lifetime home is an ordinary home incorporating 16 design features for accessible living. These make homes easier to occupy for the entire life cycle of a household, whether its members are young, old, healthy or ill.

#### WHEELCHAIR HOUSING

A minimum of 10% of new housing should either meet wheelchair housing standards, or be easily adapted to meet them. Wheelchair housing provides independence and quality of life for wheelchair users and should be tailor-made for their specific needs.

- 5.3 In addition, the following building regulations should be considered where appropriate:
- Part M of the Building Regulations (2004 edition) – this sets minimum requirements for building standards in public buildings and new dwellings only.
  - BS 8300: 2009: Design of buildings and their approaches to meet the needs of disabled people – good practice guidance that covers non-domestic buildings and details on specific building types.
- 5.4 This planning guidance is applicable to all development. It applies equally to new build, refurbished, converted, extended and altered

premises. It should also be read in conjunction with the Council's 'Camden Wheelchair Housing Design Brief 2010'.

- 5.5 The application of Lifetime Homes and Wheelchair Housing Standards varies depending on the type of dwelling as follows (see also Development Policy DP6 and supporting paragraphs 6.7 to 6.9):
- Lifetime Homes standards apply to all developments of self-contained housing (but does not apply to hotels or student housing);
  - Wheelchair Housing Standards apply to all developments providing 10 or more self-contained homes and to student housing;
  - both sets of standards apply to housing in mixed-use developments as well as purely residential developments;
  - both sets of standards apply to new build development, conversions, reconfigurations and changes of use; and
  - the requirements will be applied flexibly to take account of the circumstances of existing buildings, particularly those that are listed. English Heritage has produced guidance on "Easy Access to Historic Buildings".

### **What is the guidance on Lifetime homes?**

- 5.6 Lifetime homes are ordinary homes built incorporating 16 design features for accessible living. These features ensure a good level of accessibility from the outset, but they also allow a dwelling to be easily adapted for even higher levels of accessibility in the future should the need arise eg to cater for raising young children and declining mobility in old age.
- 5.7 Lifetime homes standards are not designed specifically for disabled people or wheelchair users but allow for accessibility features to be easily incorporated at a later date if needed. There are separate Wheelchair Housing standards to guide the design of homes to meet the specific needs of people who are long-term wheelchair users (see paragraph 5.15)
- 5.8 By planning for accessibility at the earliest stage, the Lifetime Homes features can be incorporated into the design of a dwelling without significant additional cost and can result in major cost savings to the building's occupants in the long run (for a discussion of cost benefits and savings of Lifetime Homes, refer to 'Costing Lifetime Homes' by the Joseph Rowntree Foundation.)
- 5.9 The table on the following pages gives key features of the 16 criteria forming the Lifetime Homes standards. These came into effect on 5 July 2010. We advise developers to refer to [www.lifetimehomes.org.uk](http://www.lifetimehomes.org.uk) for additional and detailed guidance on how specific requirements can be met, and also for news of any future revisions.

## Lifetime Homes – Features

LIFETIME HOMES CRITERIA	KEY OBJECTIVES	DETAILED CRITERIA
<b>1. Parking (width or widening capability)</b>	<p>Provide, or enable by cost effective adaptation, parking that makes getting into and out of the vehicle as convenient as possible for the widest range of people (including those with reduced mobility and/or those with children).</p> <p>General Note: Criterion 1 is not relevant to developments that do not contain any parking provision (for specific requirements refer to <b>Camden Development Policy – DP18 Parking standards</b> and limiting the availability of car parking - which specifically discourages on-site parking).</p>	<p>a) 'On plot' (non-communal) parking: Where a dwelling has car parking within its individual plot (or title) boundary, at least one parking space length should be capable of enlargement to achieve a minimum width of 3300mm.</p> <p>b) Communal or shared parking: Where parking is provided by communal or shared bays, spaces should be provided with a width of 3300mm and in accordance with the specification given in Appendix 2 on page 65 or <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a>.</p>
<b>2. Approach to dwelling from parking (distance, gradients and widths)</b>	<p>Enable convenient movement between the vehicle and dwelling for the widest range of people, including those with reduced mobility and/or those carrying children or shopping.</p>	<p>The distance from the car parking space of Criterion 1 to the dwelling entrance (or relevant block entrance or lift core), should be kept to a minimum and be level or gently sloping. The distance from visitors parking to relevant entrances should be as short as practicable and be level or gently sloping.</p>
<b>3. Approach to all entrances</b>	<p>Enable, as far as practicable, convenient movement along other approach routes to dwellings (in addition to the principal approach from a vehicle required by Criterion 2) for the widest range of people.</p>	<p>The approach to all entrances should preferably be level or gently sloping, and in accordance with the specification given at <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a></p>
<b>4. Entrances</b>	<p>Enable ease of use of all entrances for the widest range of people.</p> <p>Note: For the purpose of requirements d) and e) of this Criterion, main entrances are deemed to be: the front door to an individual dwelling, the main communal entrance door to a block of dwellings, plus any other entrance door associated with the approach route from parking required by Criterion 2.</p>	<p>All entrances should:</p> <ol style="list-style-type: none"> <li>Be illuminated</li> <li>Have level access over the threshold; and</li> <li>Have effective clear opening widths and nibs as specified given at <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a></li> <li>In addition, main entrances should also: <ol style="list-style-type: none"> <li>Have adequate weather protection*</li> <li>Have a level external landing.*</li> </ol> </li> </ol>
<b>5. Communal stairs and lifts</b>	<p>Enable access to dwellings above the entrance level to as many people as possible.</p>	<p>a) Communal Stairs Principal access stairs should provide easy access in accordance with the specification given at <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a>, regardless of whether or not a lift is provided.</p> <p>b) Communal Lifts Where a dwelling is reached by a lift, it should be fully accessible in accordance with the specification given at <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a></p> <p>Note: provision of a lift is not a Lifetime Homes requirement, but is recommended where dwellings are not entered at the same level as the main block entrance.</p>
<b>6. Internal doorways and hallways</b>	<p>Enable convenient movement in hallways and through doorways.</p>	<p>Movement in hallways and through doorways should be as convenient to the widest range of people, including those using mobility aids or wheelchairs, and those moving furniture or other objects. As a general principle, narrower hallways and landings will need wider doorways in their side walls. The width of doorways and hallways should conform to the specification given at <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a>.</p>
<b>7. Circulation Space</b>	<p>Enable convenient movement in rooms for as many people as possible.</p>	<p>There should be space for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchair users elsewhere.</p>

## Lifetime Homes – Features (continued)

LIFETIME HOMES CRITERIA	KEY OBJECTIVES	DETAILED CRITERIA
<b>8. Entrance level living space</b>	Provide accessible socialising space for visitors less able to use stairs.	A living room / living space should be provided on the entrance level of every dwelling (see Appendix 1 on page 65 or <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a> for definition of 'entrance level'). Note: Entrance level generally means the storey containing the entrance door to the individual dwelling. It may refer to the first storey that contains a room (habitable or non-habitable) if the entrance door leads directly to an 'easy-going' stair.
<b>9. Potential for entrance level bed-space</b>	Provide space for a member of the household to sleep on the entrance level if they are temporarily unable to use stairs	In dwellings with two or more storeys, with no permanent bedroom on the entrance level, there should be space on the entrance level that could be used as a convenient temporary bed-space (see Appendix 1 on page 65 or <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a> for definition of 'entrance level').
<b>10. Entrance level toilet and shower drainage</b>	Provide an accessible toilet and potential showering facilities for: a) any member of the household using the temporary entrance level bed space of Criterion 9, and: b) visitors unable to use stairs.	Where an accessible bathroom, in accordance with Criterion 14, is not provided on the entrance level of a dwelling, the entrance level should have an accessible toilet compartment, with potential for a shower to be installed – as detailed in the specification given at (see Appendix 1 on page 65 or <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a> for definition of 'entrance level')
<b>11. Toilet and bathroom walls</b>	Ensure future provision of grab rails is possible, to assist with independent use of toilet and bathroom facilities.	Walls in all bathrooms and toilet compartments should be capable of firm fixing and support for adaptations such as grab rails.
<b>12. Stairs and potential through-floor lift in dwelling</b>	Enable access to storeys above the entrance level for the widest range of households.	The design within a dwelling of two or more storeys should incorporate both: a) Potential for stair lift installation; and b) A suitable identified space for a through-the-floor lift from the entrance level to a storey containing a main bedroom and a bathroom satisfying Criterion 14.
<b>13. Potential for fitting of hoists and bedroom / bathroom relationship</b>	Assist with independent living by enabling convenient movement between bedroom and bathroom facilities for a wide range of people.	Structure above a main bedroom and bathroom ceilings should be capable of supporting ceiling hoists and the design should provide a reasonable route between this bedroom and the bathroom.
<b>14. Bathrooms</b>	Provide an accessible bathroom that has ease of access to its facilities from the outset and potential for simple adaptation to provide for different needs in the future.	An accessible bathroom, providing ease of access in accordance with the specification given at <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a> should be provided in every dwelling on the same storey as a main bedroom.
<b>15. Glazing and window handle heights</b>	Enable people to have a reasonable line of sight from a seated position in the living room and to use at least one window for ventilation in each room.	Windows in the principal living space (typically the living room), should allow people to see out when seated. In addition, at least one opening light in each habitable room should be approachable and usable by a wide range of people – including those with restricted movement and reach. Note: In kitchens areas or bathrooms with only one window situated behind kitchen units or bathroom fittings, the requirement for a potential clear approach space to that window need not apply. However, the window handle height/control requirement remains applicable. Any other window within the kitchen area or bathroom, not behind fittings, is required to satisfy both the approach and window handle/control height requirements.
<b>16. Location of service controls</b>	Locate regularly used service controls, or those needed in an emergency, so that they are usable by a wide range of household members - including those with restricted movement and limited reach.	Service controls should be within a height band of 450mm to 1200mm from the floor and at least 300mm away from any internal room corner.

**APPENDIX 1 - DEFINITION OF 'ENTRANCE LEVEL' FOR THE PURPOSE OF LIFETIME HOMES CRITERIA**

The entrance level of a dwelling for the purposes of the Lifetime Homes Criteria is generally deemed to be the storey containing the main entrance door as defined by Criterion 4. This will usually be the ground floor of a house, or the storey containing the entrance door of a flat approached a communal hall, stair, or lift.

Where there are no rooms (habitable or non-habitable) on the storey containing the main entrance door (e.g. most flats over garages, some flats over shops, some duplexes and some townhouses), the first storey level containing a habitable or non-habitable room can be considered the 'entrance level' if this storey is reached by an 'easy going' stair with maximum risers 170mm, minimum goings 250mm, and a minimum width of 900mm measured 450mm above the pitch line.

**APPENDIX 2 - COMMUNAL CAR PARKING MANAGEMENT PLANS**

Where communal parking is provided, the Council may require a Parking Management Plan to ensure that adequate parking space is available for disabled people. The parking management plan should include a mechanism to ensure that the supply and demand of wider bays / blue badge bays are regularly monitored and provision reviewed, to ensure that provision equates to any change in the demand from disabled residents and visitors and that the bays are effectively enforced to stop abuse by non blue badge holders. The needs of residents who occupy a home designated for wheelchair users and any residents who hold a blue badge and occupy any other home should be addressed.

**Key requirements for lifetime homes standards:**

- 5.10 As the Building Regulations do not currently require dwellings to be built to lifetime homes standards it is necessary to check compliance at the planning application stage. Therefore planning applications for new housing are expected to include information in the design statement and access statement showing how the proposed development addresses the 16 Lifetime Homes Criteria. Information on access statements can be found in the '**Access for all**' section of CPG6 **Amenity**.

- 5.11 Applicants should specifically submit a schedule setting out how each of the 16 criteria will be met. Plans should particularly include sufficient detail of the following key internal space criteria, such as:
- 6 - Internal doorways and hallways
  - 7 - all necessary circulation space within and between rooms
  - 8 - an entrance level living space
  - 9 – potential for an entrance level space that can be used as a bed-space
  - 10 - entrance level toilet and shower drainage at entrance level
  - 12 – stairs and potential through-floor lift in dwelling
  - 14 - an accessible bathroom
- 5.12 In the case of conversion of an existing building or other circumstances of a development may mean it may not be possible for new homes to meet all 16 criteria. In this case, the development should still seek to meet Lifetime Homes Standards as far as possible to maximise accessibility and demonstrate to the Council’s satisfaction why it is not possible to meet particular criteria.
- 5.13 Applicants should include a schedule within the design and access statement for their development that sets out:
- how each of the 16 Lifetime Homes criteria will be met;
  - identifying any Lifetime Homes criteria that will not be met;
  - demonstrating that these criteria cannot be met, or otherwise justifying failure to meet them.
- 5.14 The Council will expect developments involving listed buildings to incorporate accessible features. English Heritage has produced guidance on “Easy Access to Historic Buildings”. This guidance document should be referred to for further advice.

### **What is the guidance on wheelchair housing?**

- 5.15 In addition to requiring residential development to meet Lifetime Homes standards above, policy DP6 requires a minimum of 10% of all new housing designed to be suitable for permanent occupation by wheelchair users or be easily adapted to meet them. Wheelchair housing standards go significantly beyond Lifetime Homes standards, which do not provide for permanent wheelchair occupation.
- 5.16 The 10% requirement will be applied individually to each tenure within a given development scheme (ie applied to each affordability category whether market housing, social rented housing or intermediate affordable housing).
- 5.17 We may agree to increase the percentage of social rented wheelchair homes and decrease the percentage of intermediate affordable wheelchair homes (or vice versa) where this will better enable us to meet the needs of identified future occupiers.

**For market housing:**

- 5.18 We will encourage the provision of fully fitted out Wheelchair Housing, but will accept provision of 10% homes designed to be easily adaptable to meet the standards.
- 5.19 New homes that are capable of being easily adaptable should incorporate the key space criteria set out in the Habinteg Wheelchair Housing Design Guide (see Figure 11 below) and ensure that any fittings and fixtures required at a later date can be easily provided without enlarging or structurally altering the home.

**For affordable housing:**

- 5.20 The 10% wheelchair requirement should be designed, built and fitted out to meet Wheelchair Housing standards in full. These affordable homes should comply with the Camden Wheelchair Housing Design Brief 2010 produced by the Council.
- 5.21 As far as possible, the Council will seek to identify future occupiers of affordable wheelchair housing and seek to ensure that it is tailored to their needs.
- 5.22 The Council's Housing Partnerships Team should be consulted for any specific design requirements required to meet the needs of future occupiers of affordable wheelchair housing (see Further Information at the end of this guidance).
- 5.23 The Council may use its affordable housing fund to support the creation of fully-fitted out affordable wheelchair housing.

**Habinteg Wheelchair Housing Design Guide:**

- 5.24 All wheelchair housing should be designed in accordance with the standards set out in the nationally recognised Habinteg Wheelchair Housing Design Guide (WHDG).
- 5.25 The standards include guidance for main entrances, doors, hallways, storage space, bedroom space, windows, etc. Below are the 13 key space criteria relating to the internal layouts of individual dwellings. The main entrances and common parts should be designed in accordance with the relevant guidance (WHDG p30 & 31)

**Figure 11. Summary of the 13 key Habinteg wheelchair housing criteria**

1. Dwellings should normally be designed on one level storey. Where a dwelling is arranged in two or more floors a vertical rise lift serving all floors must be provided. (WHDG p63)
2. The entrance door to the dwelling should provide a minimum clear opening width of 800mm (when accessed head on) or 825mm (when the approach is not head on). It should be weather protected and lit and be provided with a 300mm clear space to the leading edge (pull side of the door) and a 200mm clear space on the push side. (WHDG p36)
3. The entrance hallway requires a manoeuvring space 1500 x 1800mm (enabling an occupier to open and close the door and turn into the living space) (WHDG p37 & 44)
4. A space to store and charge an electric wheelchair should be provided as an extension to the circulation space of the dwelling. Care should be taken to ensure that storage of the chair does not restrict the minimum clear effective width of any corridor. Consideration should be given to how the facility is accessed and used. To guarantee sufficient manoeuvring space an overall space of 1100 x 1700mm should be provided. (WHDG p45)
5. All halls and corridors (facilitating 90° turns) should have a clear unobstructed width of at least 1200mm and internal door clear opening widths of at least 800mm. To facilitate a 180° turn a corridor width of 1500mm is required. (WHDG p57)
6. All internal doors require a 300mm clear space to the leading edge (pull side of the door) and a 200mm clear space on the push side. (WHDG p58)
7. A 1500 x 1800mm turning circle should be provided in the kitchen. (WHDG p7)
8. In all bedrooms a 1200 x 1200mm clear space should be provided to one side of the bed, 1000mm circulation is required to the other sides and the foot of each bed. In single bedrooms access to one side of the bed is acceptable. All furniture and window controls should be reachable and usable. (WHDG p88)
9. In all bathrooms space should be provided to facilitate frontal, side and oblique transfer to the toilet. The bathrooms and toilets should normally have outward opening doors or provide a clear space of 1100mm between the door swing and any fixture or fitting. (WHDG p78)
10. All bathrooms should provide a 1500 x 1500mm square manoeuvring space, clear of all fittings (WHDG p78)
11. In all bathrooms a drainage gully and services to facilitate the installation of a level entry shower (1000 x 1000mm) should be provided. (WHDG p85)
12. A clear ceiling-track hoist route (suitably constructed and with a ready power supply) should be provided between the bathroom and the main bedroom (WHDG p80 & 15)
13. Windows should be able to be opened from a seated position. Controls should be located no higher than 1000mm above finished floor level and suitable for use by people with limited manual dexterity (WHDG p99)

For the latest edition of these standards, please refer to: "Wheelchair housing design guide" edited by Stephen Thorpe and available from Habinteg Housing Association:  
[www.habinteg.org.uk/pages/whdg.html](http://www.habinteg.org.uk/pages/whdg.html) (available from BREbookshop.com ISBN 1860818978)



### **Key requirements for wheelchair housing standards**

- 5.26 Planning applications will need to show which units are wheelchair accessible and how they are wheelchair accessible or how they can be easily adapted to be suitable for wheelchair users. Full wheelchair housing standards should be met within affordable housing and will be negotiated within market housing on a case by case basis.
- 5.27 Applications for planning permission should show full details of how 10% of homes will comply with wheelchair housing standards or, in the case of market housing, design features that ensure that 10% of homes are easily adaptable to meet the standards.
- 5.28 Plans should identify all wheelchair housing (or homes easily adaptable to the standards) and applications should include drawings setting out how the 13 key space criteria identified in Figure 11 will be met.
- 5.29 Applicants should include a schedule within the design and access statement for their development that sets out:
- how each of the 13 key space criteria will be met;
  - identifying any key space criteria that will not be met;
  - demonstrating that these criteria cannot be met, or otherwise justifying failure to meet them.
- 5.30 In the case of conversion of an existing building, we will apply the 10% requirement flexibly to take into account any constraints that would prevent the inclusion of entrances and internal spaces suitable for a wheelchair user.
- 5.31 For further design guidance on wheelchair housing please refer to the Mayor of London's SPG: 'Accessible London – Achieving an Inclusive Environment' (April 2004) - [http://static.london.gov.uk/mayor/strategies/sds/accessible\\_london.jsp](http://static.london.gov.uk/mayor/strategies/sds/accessible_london.jsp) (accessed April 2011).

### **Additional considerations**

#### **Requirements in other residential buildings**

- 5.32 In general, mobility difficulties and the need to provide for wheelchair users should be considered in the design of all forms of housing. The type of provision will need to be individually tailored to suit the nature of the facility and the likely needs of future occupiers.
- 5.33 In relation to student housing there is no requirement to meet Lifetime Homes standards, however, 10% of student bedrooms/ study flats (together with supporting communal spaces) are expected to meet wheelchair standards. Suitable design layouts are included in Approved Document M (known as Part M) of the Building Regulations.

### **Key building regulation requirements**

- 5.34 The accessibility of accommodation should be considered whether the proposal is for new build, conversions or refurbishments.
- 5.35 Part M of the Building Regulations sets minimum accessibility requirements for building standards in new residential dwellings and is required in addition to Lifetime Homes and wheelchair accessible housing standards being met. They apply at the Building Regulation approval stage and, as such, are not a matter for consideration in the planning process.
- 5.36 BS 8300:2009 'Design of buildings and their approaches to meet the needs of disabled people – Code of Practice' (BSI) provides good practice guidance for various types of non-domestic buildings.
- 5.37 For further information on part M of the Building Regulations or BS 8300:2009 please contact the Council's Building Control Service or refer to the regulations on the Department for Communities and Local Government's website:  
[www.communities.gov.uk/planningandbuilding/buildingregulations/](http://www.communities.gov.uk/planningandbuilding/buildingregulations/)

### **Securing lifetime homes and wheelchair housing through conditions and legal agreements**

- 5.38 Homes need to satisfy specific layout and space criteria in order to meet Lifetime Homes and Wheelchair Housing Standards. If homes are not designed to meet these criteria from the outset, it may not be possible to accommodate the necessary spaces within the envelope of the dwelling as proposed. Consequently, if submitted applications do not show dwellings that meet Lifetime Homes and Wheelchair Housing Standards, they cannot be secured by condition.
- 5.39 Conditions may be used exceptionally in connection with Lifetime Homes Standards where:
- constraints of an existing building will prevent layout and space criteria from being met
  - key layout and space criteria can clearly be met by the proposed housing, but other Lifetime Homes criteria have not demonstrably been met by submissions with the planning application.  
 In each case, a condition may be used to secure submission of additional details of how specific Lifetime Homes criteria will be met before the development is implemented.
- 5.40 Development policy DP6 requires the provision of the 10% affordable wheelchair housing to be designed, built and fitted out to meet wheelchair housing standards in full. It will always be secured through a planning obligation (also known as a section 106 agreement or legal agreement). In most cases, the terms will specify:
- all wheelchair housing in the development

- which wheelchair housing will be social rented and which will be intermediate affordable housing
- arrangements to ensure that affordable wheelchair housing is fully fitted out to the agreed specifications, including payment of a bond where appropriate
- arrangements to ensure that affordable wheelchair housing is completed and fully fitted out to an acceptable timescale.

5.41 In some cases the terms may also specify:

- arrangements for submission of revised or additional plans or schedules where key space criteria have not demonstrably been met by submissions with the planning application;
- arrangements to ensure that affordable wheelchair housing can be viewed by potential occupiers before it is fitted out;
- arrangements to ensure that affordable wheelchair housing is available to wheelchair users in the future.

5.42 Provision of 10% wheelchair housing (or easily adaptable market housing) in market schemes is required but often future occupiers will be unknown until after the homes have been fitted out - under Development policy DP6 it may be exceptionally secured through a planning obligation where submissions with the planning application do not demonstrate that 10% of market homes meet the key space criteria. In such cases, the terms will specify:

- arrangements for submission of revised or additional plans or schedules showing that 10% of market homes meet key space criteria;
- arrangements to ensure that wheelchair housing is completed to the agreed specifications.

## Further information

<p>Lifetime Homes  <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a></p>
<p>Mayor's guidance at <a href="http://www.london.gov.uk/strategy-policy/accessible-london-achieving-inclusive-environment">http://www.london.gov.uk/strategy-policy/accessible-london-achieving-inclusive-environment</a> (see Mayor's Priorities - Planning - Accessible London: Achieving an Inclusive Environment - July 2011):          SPG 'Accessible London: Achieving an Inclusive Environment' (April 2004)          'Lifetime Homes – case study examples' (September 2006)          Best Practice Guidance 'Wheelchair Accessible Housing' (September 2007)</p>
<p>Housing Supplementary Planning Guidance (Mayor of London, November 2012)  <a href="http://www.london.gov.uk/who-runs-london/mayor/publications/planning/housing-supplementary-planning-guidance">http://www.london.gov.uk/who-runs-london/mayor/publications/planning/housing-supplementary-planning-guidance</a>          (see Mayor's Priorities - Planning – Supplementary Planning Guidance)</p>
<p>London Housing Design Guide (Mayor of London, August 2010)  <a href="http://www.london.gov.uk/who-runs-london/mayor/publications/housing/london-housing-design-guide">www.london.gov.uk/who-runs-london/mayor/publications/housing/london-housing-design-guide</a> (accessed April 2011)</p>
<p>Building Regulations 2010 Approved Document M - Access to and Use of Buildings (known as Part M)</p>
<p>British Standard BS 8300:2009+A1: 2010 Design of buildings and their approaches to meet the needs of disabled people – Code of Practice (BSI)</p>
<p>British Standard BS 9999:2008 Code of Practice for Fire Safety in the Design, Management and Use of Buildings (BSI)</p>
<p>Camden Council Housing Adult and Social Care 'Camden Wheelchair Housing Design Brief 2013'  <a href="http://www.camden.gov.uk/ccm/content/housing/housing-policy-and-strategies/camden-wheelchair-design-guide/camden-wheelchair-design-guide.en">http://www.camden.gov.uk/ccm/content/housing/housing-policy-and-strategies/camden-wheelchair-design-guide/camden-wheelchair-design-guide.en</a></p>

## 6 Development involving net loss of homes

### KEY MESSAGES

- We will generally resist proposals for redevelopment or conversion of housing that involve the net loss of two or more homes.
- Developments involving the loss of two or more homes may be acceptable in certain circumstances, including the creation of large homes in a part of the Borough that has a relatively low proportion of existing large dwellings.
- We will assess proposals taking into account all relevant material considerations and particularly the history of the site including previous developments and valid planning consents involving the loss of homes.

- 6.1 This guidance relates to Core Strategy policy CS6 – *Providing quality homes* and Development Policy DP2 – *Making full use of Camden's capacity for housing*. It applies to all development that involves the net loss of homes. This guidance does not relate to applications for Lawful Development Certificates.
- 6.2 Camden's Core Strategy indicates that the projected growth in the number of households exceeds the anticipated supply of additional homes. The Council therefore seeks to minimise the net loss of existing homes.
- 6.3 Camden's Development Policies document indicates that the number of conversion and redevelopment schemes each year that involve a loss of homes is sufficient to create a significant cumulative loss and contribute to the shortfall between the additional supply of homes and projected growth in the number of households. Many schemes involve combining 2 or more homes into a single large dwelling, and there is some evidence to suggest that where large homes exist in Camden, they are relatively unlikely to be occupied by large households. In 2001, 47% of the households occupying a home with 5-or-more rooms were one- or two-person households. The proportion of one- or two-person households was 54% for owner-occupied homes with 5-or-more rooms.
- 6.4 The Council does not generally seek to resist schemes combining dwellings where they involve loss of a single home. This provision creates some scope for growing families to expand into an adjoining property. However, the provision can also be used to make successive changes to a property to combine several homes into a single large dwelling. A town house comprising 5 flats (one per floor from basement to 3rd floor) could become one large dwelling through 4 losses of a single flat, reducing the number of occupiers below the capacity of the property, and generating a need for 4 additional homes elsewhere. The floorspace of the large dwelling created in such a scenario would

typically exceed 250 sq m, which is very much greater than the minimum space standards for a 6-person dwelling set out in this guidance and in the London Plan.

- 6.5 The Council will therefore apply Development Policy DP2 to resist a succession of developments that involve combining small homes to create larger homes. When considering planning applications we will take into account all relevant material considerations including the cumulative loss of units created by past changes and the potential for further losses from planning consents that have not expired. We will particularly focus on changes in the same apartment or flat building, or in the same sub-divided town house.
- 6.6 Development Policy DP2 does provide for developments involving the net loss of two or more homes where they would create large homes in a part of the borough with a relatively low proportion of large dwellings. This relates to the six wards listed in paragraph 2.24 of Camden's Development Policies document, namely Bloomsbury, Holborn and Covent Garden, King's Cross, Kilburn, Regent's Park and St Pancras and Somers Town. Census data for 1991 and 2001 shows that in both years fewer than 26% of households in these wards lived in homes with 5 or more rooms. Providing for the development of more large homes in these wards contributes to the objective of creating mixed and inclusive communities set out in the NPPF and policy CS6 of Camden's Core Strategy.
- 6.7 Development Policy DP2 also provides for developments involving the net loss of two or more homes where they would enable sub-standard units to be enlarged to meet residential space standards. We will consider such proposals favourably if existing homes are 20% or more below the space standards and the loss of dwellings is no greater than is necessary to meet the standard.
- 6.8 Development Policy DP2 also provides for developments involving the net loss of two or more homes where they would enable existing affordable homes to be adapted to provide the affordable dwelling-sizes most needed, having regard to severe problems of overcrowding and the high proportion of one-bedroom dwellings in the Council stock.
- 6.9 The Council will keep Camden Planning Guidance under review and will apply this guidance and Development Policy DP2 taking into account all relevant material considerations including the latest information from the 2011 Census, population projections, other evidence relating to housing need and supply, and the impact of changes to national and regional planning policy. We will also take account of the minimum borough annual average housing target set out in the London Plan 2011, monitoring of housing delivery and the NPPF requirement that local planning authorities should plan to meet the full objectively assessed needs for housing.

## Schedule of draft “affordable rent” amendments published for consultation in November and December 2012

Camden Council's Cabinet agreed draft amendments to CPG2 for consultation purposes on 12 September 2012, and consultation took place from November to December 2012. The draft amendments dealt primarily with:

- our approach to the Government's "affordable rent" product;
- our mechanism for securing deferred affordable housing contributions;
- measures to ensure that affordable housing is secured on-site within large and small developments wherever practical; and
- measures to prevent several flats being merged into a single large home through a series of mergers of two flats into one.

The Mayor also published alterations to the London Plan in 2012 to reflect Government policy on the "affordable rent" product. The Mayor's London Plan alterations conflict with elements of Camden's draft amendments on "affordable rent". The Mayor's alterations were formally examined by a planning inspector who has recommended that they be changed to allow boroughs to issue guidance that ensures the new product is "genuinely affordable". The Mayor has decided not to accept the inspector's recommendations, but it is anticipated that a Judicial Review of his decision will be sought.

Elements of the draft CPG2 amendments that do not deal with "affordable rent" were considered on 4 September 2013, and the Cabinet agreed to adopt them with changes to take account of responses to the consultation. Amendments to CPG2 that relate to "affordable rent" have not yet been adopted or withdrawn. The draft amendments are reproduced here to provide information about the Council's aspirations, but they do not constitute formal planning policy.

Proposed new text is underlined. Text proposed for deletion is ~~struck through~~. Bold text in this appendix relates to text that was shown in bold in the adopted CPG.

Paragraph / reference	Draft amendment
Box before para 2.1	Affordable housing includes social rented housing, <u>genuinely affordable rented housing</u> and intermediate <del>affordable</del> housing
Para 2.11	Affordable housing is defined in the Government's <u>National Planning Policy Framework (NPPF) – Annex 2, Planning Policy Statement PPS3 – Housing (Annex B)</u> . <u>The NPPF PPS3 indicates that affordable housing should:</u> <ul style="list-style-type: none"> <li>• <u>be provided to meet the needs</u> of households whose needs are not met by the market <del>and who are eligible for affordable housing</del>, and</li> </ul>

Paragraph / reference	Draft amendment																				
	<ul style="list-style-type: none"> <li>be provided to households who are eligible for affordable housing at a cost they can afford, taking into account local household incomes and local house prices market housing costs, and</li> <li>remain at an affordable price for future eligible households unless arrangements are in place for subsidies to be recycled into alternative affordable housing provision.</li> </ul>																				
Para 2.12	The London Plan provides details of income groups that are eligible for affordable housing, which the Mayor reviews annually.																				
Para 2.13	Three <del>Two</del> types of affordable housing are defined in the NPPF PPS3 – these are <b>social rented housing, affordable rented housing</b> and <b>intermediate affordable housing</b> . The Government intends to introduce a third type known as affordable rented housing.																				
Para 2.14	<b>Social rented housing</b> is primarily housing managed by local councils and housing associations. The cost of social rented housing is controlled through target rents set by a national rent regime. Other affordable housing providers may manage social rented housing under the same rental arrangements. Figure 1 provides information on the level of social rents and market rents in Camden.																				
Figure 1 after para 2.14	<p><b>Housing costs in Camden 2008</b></p> <table border="1" data-bbox="549 1196 1321 1727"> <thead> <tr> <th></th> <th>1 bedroom</th> <th>2 bedroom</th> <th>3 bedroom</th> <th>4 bedroom</th> </tr> </thead> <tbody> <tr> <td>target rent for social rented housing costs (average, per week)*</td> <td>£98.78 £70</td> <td>£111.66 £82</td> <td>£126.60 £91</td> <td>£144.30 £101</td> </tr> <tr> <td>market housing costs to rent (average, per week)*</td> <td>£300 £240</td> <td>£400 £330</td> <td>£530 £450</td> <td>£675 £575</td> </tr> <tr> <td>market house housing prices (median)# to buy</td> <td>£421,315 £275,000</td> <td>£428,976 £330,000</td> <td>£509,408 £425,000</td> <td>£689,425 £675,000</td> </tr> </tbody> </table> <p>Sources: * Camden Affordable Rent Study 2011, # Land registry 2008-9 Camden Housing Needs Survey Update 2008</p> <p>(note — market costs given are for lower quartile rents in the cheaper areas of the borough — in these areas, 25% of market rents/ prices are lower than the figure given and 75% of market rents/ prices are higher)</p>		1 bedroom	2 bedroom	3 bedroom	4 bedroom	target rent for social rented housing costs (average, per week)*	£98.78 £70	£111.66 £82	£126.60 £91	£144.30 £101	market housing costs to rent (average, per week)*	£300 £240	£400 £330	£530 £450	£675 £575	market house housing prices (median)# to buy	£421,315 £275,000	£428,976 £330,000	£509,408 £425,000	£689,425 £675,000
	1 bedroom	2 bedroom	3 bedroom	4 bedroom																	
target rent for social rented housing costs (average, per week)*	£98.78 £70	£111.66 £82	£126.60 £91	£144.30 £101																	
market housing costs to rent (average, per week)*	£300 £240	£400 £330	£530 £450	£675 £575																	
market house housing prices (median)# to buy	£421,315 £275,000	£428,976 £330,000	£509,408 £425,000	£689,425 £675,000																	



Paragraph / reference	Draft amendment
<p>New paras 2.14a, 2.14b etc after para 2.14</p>	<p><b>Affordable rented housing</b> is housing managed by local councils and housing associations and let to households who are eligible for social rented housing. The NPPF indicates that rents should not exceed 80% of the local market rent (including service charges where they apply). Affordable rented housing should also meet the general NPPF definition of affordable housing summarised in paragraph 2.11, but given the high cost of market housing in Camden rents approaching 80% of market levels will seldom be affordable to households who are eligible for social rented housing. The Council will therefore expect the provision of <b>genuinely affordable rented housing</b> which is let at a price that eligible households can afford.</p> <p>In order to ensure that rents are genuinely affordable, they should be set to take account of the incomes of households who are eligible for social rented housing, benefit caps, caps on Local Housing Allowance and lower quartile market rents available locally and across Camden (including less expensive parts of the borough). Affordability will be assessed on the basis that housing costs (rent and service charges) should not exceed 30% of gross income (which is consistent with the Camden Housing Needs Survey Update 2008 and broadly equivalent to 40% net income).</p> <p>The Council commissioned the Camden Affordable Rent Study 2011 to assess the potential of this type of tenure to meet local housing needs. The study noted that median income (gross annual) in the borough was £33,054 in 2010, equivalent to £635.65 per week (PayCheck). On the basis of the affordability calculation in paragraph 2.14b, a household on a median income could potentially pay a weekly rent (including service charges) not exceeding £190.70.</p> <p>The study concluded that only households needing small homes (up to two-bed homes) would be able to afford rents significantly above social rent. Rents approaching 80% of market rent in Camden would be too expensive for many families. Consequently, the Council considers that genuinely affordable rents may be appropriate for one- and two-bedroom homes, but expects affordable homes with three bedrooms or more to be provided at social rents. Paragraphs 2.42 to 2.53 of this guidance give more details of the size of affordable homes we seek, and how it relates to tenure.</p>
<p>Para 2.15</p>	<p>Intermediate affordable housing is housing that costs more than social housing but less than equivalent market housing. Intermediate affordable housing costs (including service charges) must also be cheap enough for eligible income groups to afford. The London Plan and the Mayor's annual reviews provide details of eligible income groups. Most intermediate affordable housing in Camden has been provided by housing associations, but the NPPF PPS3 indicates that intermediate affordable housing can include homes provided by private sector bodies. Provided that it costs less than market housing and is cheap enough for eligible</p>

Paragraph / reference	Draft amendment
	<p>income groups, intermediate <del>affordable</del> housing can include a range of tenures such as:</p> <ul style="list-style-type: none"> <li>• rented housing;</li> <li>• shared-ownership housing (where occupiers buy a share and rent the remainder) and;</li> <li>• low cost homes for sale.</li> </ul>
Para 2.16	<p>Camden controls the cost of intermediate <del>affordable</del> housing taking into account market costs and the eligible income groups set out in the London Plan and the Mayor's annual reviews. The Mayor's February <del>2012</del> 2014 review <del>indicates</del> <u>indicated</u> that <del>eligible</del> households <del>eligible for intermediate homes with two bedrooms or less are</del> <u>were</u> those with incomes of less than <del>£64,300</del> <u>£64,000</u> per year (gross). The draft replacement London Plan <del>indicates that he intends to raise the eligible income to £74,000 per year for intermediate affordable homes with three 2-bedrooms or more is</del> <u>£77,200 per year</u>.</p>
Para 2.17	<p>To convert income thresholds into housing costs, the Mayor's Housing Supplementary Planning Guidance (2005 <u>and 2011 draft replacement</u>) <del>indicates that the affordability of intermediate affordable housing should cost: will be assessed on the basis that housing costs (including rent and service charges) should be</del></p> <ul style="list-style-type: none"> <li>• <del>no more than 3.5 times the household income threshold to buy; and</del></li> <li>• <del>no more than 40% of net household income including rent and service charges.</del></li> </ul>
Para 2.19	<p><del>Affordable rented housing is a new product devised by the Government. The Government intends this to meet the general PPS3 definition of affordable housing summarised in paragraph 2.11, but to be outside the national rent regime. Rents should not exceed 80% of local market rents. In March 2011 only limited information has been released on rent control mechanisms, and the Council has yet to consider its approach to affordable rented housing. The cost of market housing in Camden is very high compared with the incomes of those who are in need and are eligible for affordable housing. Initial indications are that the potential for affordable rented housing to meet housing need in Camden is extremely limited, particularly need for affordable family homes. This guidance will be reviewed when the potential contribution of affordable rented housing is understood more clearly.</del></p>
Para 2.34 (now 2.35)	<p>When negotiating on individual schemes, Camden calculates the proportion of housing in each category (market/ social rented/ <u>affordable rented/</u> intermediate <del>affordable</del>) in terms of floorspace. This arrangement enables us to negotiate family-sized affordable</p>

Paragraph / reference	Draft amendment
	<p>housing in schemes where the developer proposes smaller market homes, and prevents an under-provision of affordable housing where the developer proposes unusually large market homes. Calculations will not generally be based on the number of dwellings or number of habitable rooms as these calculations would create an incentive for the developer to provide the smallest affordable homes possible.</p>
<p>Para 2.42 (now 2.43)</p>	<p><b>Mix of <del>social rented housing and intermediate</del> <u>different affordable housing types</u></b></p> <p>The Core Strategy indicates that we are aiming to tackle social polarisation and create mixed and balanced communities by seeking a diverse range of housing products to suit a range of incomes. Many households who need affordable homes in Camden will only be able to afford social rented housing, however we recognise that intermediate affordable housing can make an important contribution to creating mixed-communities. Camden's Core Strategy sets out guidelines that 60% of affordable housing should be social rented housing and 40% should be intermediate affordable housing. <u>To reflect the new category of homes included in NPPF and the findings of the Camden Affordable Rent Study, the Council now seeks 30% social rented housing (with three-bedrooms or more), 30% genuinely affordable rented housing (with one or two bedrooms) and 40% intermediate housing.</u> As indicated in paragraphs 2.34 and 2.35 of this guidance, it will generally be appropriate to calculate the split between social rented, <u>genuinely affordable rented</u> and intermediate <del>affordable</del> housing in terms of net internal floorspace.</p>
<p>Para 2.43 (now 2.44)</p>	<p><del>Since adoption of Camden's Core Strategy and Development Policies document, the Government has introduced a new product called affordable rented housing. More information about affordable rented housing is provided in paragraph 2.19 of this guidance. Initial indications are that the potential for affordable rented housing to meet housing need in Camden is extremely limited, although small affordable rented homes may be able to help tackle social polarisation. The Council has yet to consider its approach to affordable rented housing, and this guidance will be reviewed when the potential contribution of affordable rented housing is understood more clearly. In the interim, proposals</del> <u>The Council considers that genuinely affordable rents may be appropriate for one- and two-bedroom homes. Proposals for affordable rented housing should be accompanied by a demonstration that the homes will comply with the Government's definition of affordable housing (as summarised in paragraph 2.11 of this guidance), and will be affordable to households whose needs are not met by market housing and who are eligible for social rented housing, having regard to benefit caps, caps on Local Housing Allowance and the lower quartile market rents available locally and across the borough (including less expensive</u></p>

Paragraph / reference	Draft amendment
	<p><del>parts of the borough</del>). The Council <del>will not</del> <del>is unlikely</del> to support proposals for affordable rented homes that would be more expensive than market homes available <del>anywhere</del> in <u>any part of the borough</u>. <u>As indicated in paragraph 2.14c of this guidance, a household on a median income of £33,054 in 2010 could potentially pay a weekly rent (including service charges) not exceeding £190.70.</u></p>
<p>New paras 2.43a and 2.43b after para 2.43 (now 2.44)</p>	<p><u>The introduction of affordable rented housing is intended to increase the ability of housing associations to fund affordable housing development. The Council will only support introduction of affordable rented housing where housing associations have an ongoing programme of development in the borough.</u></p> <p><u>In some circumstances, housing associations may seek to re-let existing homes at affordable rents when they become vacant. Where these homes are tied to social rents by a S106 legal agreement, housing associations will not be able to make this change unless the Council agrees to vary the legal agreement. The Council will only agree such a change where the proposed rents would be genuinely affordable and comply with the all the provisions for genuinely affordable rented housing set out in this guidance, particularly paragraphs 2.14a to 2.14d, 2.43, 2.43a to 2.43b, 2.51 and 2.52.</u></p>
<p>Para 2.44 (now 2.45)</p>	<p>Paragraph 6.57 of Camden's Core Strategy and Development Policy DP3 indicate that the Council will consider various characteristics of the development, the site and the area when negotiating the nature of the affordable housing contribution from specific schemes. Considerations that may influence the proportion of social rented housing and intermediate <del>affordable</del> housing are set out in paragraphs 3.22 to 3.30 of our Development Policies document. Circumstances where the Council may depart from the <del>60%</del> <u>30% social rented: 30% genuinely affordable rented: 40% intermediate <del>affordable</del> split</u> include:</p> <ul style="list-style-type: none"> <li>• providing flexibility for up to 100% social and <u>genuinely affordable rented housing (combined)</u> or 100% intermediate <del>affordable</del> housing where the overall proportion of affordable housing in the scheme is substantially over 50%;</li> <li>• seeking up to 100% social and <u>genuinely affordable rented housing (combined)</u> where the overall proportion of affordable housing in the scheme is 30% or less;</li> <li>• providing flexibility for more than 40% intermediate <del>affordable</del> housing where this can help to create a mixed <u>and an</u> inclusive community in an area with an existing concentration of social rented housing; and</li> <li>• providing flexibility for more than 60% social rented <u>and genuinely affordable rented housing (combined)</u> where high</li> </ul>

Paragraph / reference	Draft amendment
	residential land values will make intermediate <del>affordable</del> housing too expensive for the households that need it.
Para 2.51 (now 2.52)	<p>This sub-section of the guidance is concerned primarily with the numbers of bedrooms that are expected as part of affordable housing development. Camden's Core Strategy indicates that we will seek a range of self-contained homes to meet identified dwelling size priorities. These priorities are set out in detail in our Development Policies document, which includes a Dwelling Size Priorities Table. <u>To reflect the new category of homes included in NPPF and the findings of the Camden Affordable Rent Study, the priorities given to social rented housing are now divided between social rented and genuinely affordable rented housing.</u> For social rented housing, we prioritise all dwellings with <del>two</del> <u>three</u> or more bedrooms, but the highest priority is given to social rented homes with 4-bedrooms or more. <u>For genuinely affordable rented housing we prioritise homes with two bedrooms.</u> For intermediate <del>affordable</del> housing, we prioritise dwellings of all sizes, but give higher priority to dwellings with 2-bedrooms or more. More detailed guidance is given in the following Figure 3 and Figure 4.</p>
Figure 3	<p><b>Mix of social rented <u>and affordable</u> rented housing</b></p> <p><b>Overall aim: 50% of homes <u>to be social rented homes with 3 bedrooms or more</u></b></p> <p><b>Preferred mix:</b></p> <ul style="list-style-type: none"> <li>• 1-bedroom homes – no more than 20%, <u>may be provided at genuinely affordable rents</u></li> <li>• 2-bedroom homes – 30%, <u>may be provided at genuinely affordable rents</u></li> <li>• 3-bedroom homes – 30%, or 50% if no <u>larger 4-bedroom</u> homes are provided, <u>should be provided at social rents</u></li> <li>• <del>4 bedrooms homes</del></li> <li>• <u>4 bedrooms or more</u> – 20%, <u>should be provided at social rents</u></li> </ul> <p><b>Other objectives:</b></p> <ul style="list-style-type: none"> <li>• Social rented <u>and affordable</u> rented homes should have physically separate kitchens and living areas where practical, particularly 3- and 4-bedroom homes. We will seek the design of 100% of 3 bedroom and 50% of 2 bedroom <del>social rented</del> homes with physically separate kitchens and living areas.</li> <li>• At least 10% of homes should be designed, built and fitted-out to meet wheelchair housing standards in accordance with Development Policy DP6, subject to accompanying paragraph 6.9.</li> </ul>

Paragraph / reference	Draft amendment
Figure 4	<p><b>Mix of intermediate affordable housing</b></p> <p><b>Overall aim: 10% of homes with 3 bedrooms or more</b></p> <p><b>Preferred mix:</b></p> <p>In order to meet needs while remaining within the cost limits set out in paragraphs 2.15 to 2.17 of this guidance, we expect most intermediate affordable homes in Camden developments to have 1- or 2-bedroom homes.</p> <ul style="list-style-type: none"> <li>• Studio flats – a proportion of studio flats may be acceptable, but we will generally resist development where all the intermediate affordable homes are studio flats</li> <li>• 1-bedroom homes – a proportion is expected in all schemes</li> <li>• 2-bedroom homes – a proportion is expected in all schemes</li> <li>• 3-bedrooms or more – 10% or more where it is possible to provide them within cost limits</li> </ul> <p><b>Other objectives:</b></p> <ul style="list-style-type: none"> <li>• We will seek the design of 20% of 2 bedroom intermediate homes with physically separate kitchens and living areas.</li> </ul> <p>At least 10% of homes should be designed, built and fitted-out to meet wheelchair housing standards in accordance with Development Policy DP6, subject to accompanying paragraph 6.9.</p>
Para 2.52 (now 2.53)	<p>The precise mix of dwellings will be negotiated with developers, affordable housing providers and any employers involved in each scheme, taking into account the character of the development, the site and the area, and other criteria included in Development Policy DP5. We will take full account of guidance in the Development Policies document dealing with large homes, child density and separate kitchens (paragraphs 5.11 to 5.13), and wheelchair housing (paragraph 6.9). Any proposals for affordable rented housing should <u>comply with the all the provisions for genuinely affordable rents set out in this guidance, particularly paragraphs 2.14a to 2.14d, 2.43, 2.43a to 2.43b, 2.51 and 2.52 (including Figure 3).</u> <del>include an appropriate mix of dwelling sizes having regard to paragraphs 2.50 and 2.51 of this guidance and to the cost of the proposed homes relative to social rented and intermediate affordable housing.</del></p>
Para 2.53 (now 2.54)	<p>Where schemes involve both social rented housing and intermediate affordable housing, it may often be appropriate to have a high proportion of one-bedroom intermediate affordable homes <u>alongside provision</u> <del>and a high proportion of social rented homes with that all have three bedrooms or more.</del> Such schemes</p>

Paragraph / reference	Draft amendment
	can potentially meet our dwelling size priorities while limiting the cost of the intermediate <del>affordable</del> housing and limiting overall child density.
Para 2.90 (now 2.100)	<p>Provision of affordable housing required under Development Policy DP3 will always be secured through a S106 planning obligation. The precise terms of the S106 agreement will vary between developments to reflect the nature and financial viability of the development. In most cases, S106 terms will include:</p> <ul style="list-style-type: none"> <li>• identifying all affordable homes in the development</li> <li>• specifying which homes will be social rented housing, <u>which will be genuinely affordable rented</u> and which homes will be intermediate <del>affordable</del>-housing</li> <li>• defining social rented housing in terms of the Government's national rent regime</li> <li>• defining intermediate <del>affordable</del> housing in terms of the income groups and the ratio of housing cost to income contained in the London Plan, the Mayor's Housing SPG and the London Plan Annual Monitoring Report</li> <li>• defining affordable rented housing in relation to <u>incomes of households who are eligible for social rented housing, benefit caps, caps on Local Housing Allowance and lower quartile market rents available locally and across the borough</u></li> <li>• identifying social rented, <u>genuinely affordable rented</u> and intermediate <del>affordable</del> wheelchair homes...</li> </ul>





## Index

Affordable housing .....	7	Privacy (residential standards) ....	59
Affordable housing (off site) .....	29	Residential development standards	
Basements (residential standards)		.....	53
.....	59	Room sizes .....	56
Daylight (residential standards)...	58	Sliding scale (affordable housing)	14
Dwelling sizes (mix of).....	20	Soundproofing (residential	
Habinteg .....	71	standards).....	60
Housing costs .....	10	Space standards (internal) .....	55
Housing mix (social to intermediate)		Student Housing .....	41
.....	17	Viability (affordable housing) .....	23
Lifetime homes .....	66	Wheelchair housing .....	70
Outdoor amenity space .....	61		

Camden Planning Guidance

# Amenity

London Borough of Camden

CPG 6





## CPG6 Amenity

1	Introduction .....	5
2	Air quality .....	7
3	Contaminated land .....	15
4	Noise and vibration .....	19
5	Artificial light .....	25
6	Daylight and sunlight .....	31
7	Overlooking, privacy and outlook .....	37
8	Construction management plans .....	39
9	Access for all .....	45
10	Wind and micro-climate .....	53
11	Open space, outdoor sport and recreation facilities .....	59
12	Planning for healthy communities .....	79



# 1 Introduction

## What is Camden Planning Guidance?

- 1.1 We have prepared this guidance to support the policies in our Local Development Framework (LDF). It is therefore consistent with the Camden Core Strategy and Development Policies, and is a formal Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions. This guidance will replace Camden Planning Guidance 2006, updating advice where appropriate and providing new guidance on matters introduced or strengthened in the LDF.
- 1.2 Camden Planning Guidance covers a range of topics (such as design, housing, sustainability and planning obligations) and all of sections should be read in conjunction with, and within the context of, Camden’s other LDF documents.

## Amenity in Camden

- 1.3 A key objective of the Camden Core Strategy is to sustainably manage growth so that it avoids harmful effects on the amenity of existing and future occupiers and to nearby properties.

## What does this guidance cover?

- 1.4 This guidance provides information on all types of amenity issues within the borough and includes the following sections:
  1. Air quality
  2. Contaminated land
  3. Noise and vibration
  4. Artificial light
  5. Daylight and sunlight
  6. Overlooking, privacy and outlook
  7. Construction management plans
  8. Access for all
  9. Wind and micro-climate
  10. Open space, outdoor sport and recreation facilities

- 1.5 This guidance supports the following Local Development Framework policies:

## Camden Core Strategy

- CS5 - Managing the impact of growth and development
- CS15 - Protecting and improving our parks and open spaces & encouraging biodiversity
- CS16 - Improving Camden’s health and well-being

**Camden Development Policies**

- DP26 - Managing the impact of development on occupiers and neighbours
- DP28 - Noise and vibration
- DP31 - Provision of, and improvements to, public open space and outdoor sport and recreation facilities
- DP32 - Air quality and Camden's Clear Zones

## 6 Daylight and sunlight

### KEY MESSAGES:

- We expect all buildings to receive adequate daylight and sunlight.
- Daylight and sunlight reports will be required where there is potential to reduce existing levels of daylight and sunlight.
- We will base our considerations on the Average Daylight Factor and Vertical Sky Component.

6.1 Access to daylight and sunlight is important for general amenity, health and well-being, for bringing warmth into a property and to save energy from reducing the need for artificial lighting and heating. The Council will carefully assess proposals that have the potential to reduce daylight and sunlight levels for existing and future occupiers.

6.2 This guidance relates to:

- Camden Core Strategy policy CS5 - *Managing the Impact of Growth and Development*;
- Core Strategy policy CS14 - *Promoting high quality places and conserving our heritage*; and
- Policy DP26 – *Managing the impact of development on occupiers and neighbours* of the Camden Development Policies.

DP26 sets out how the Council will protect the quality of life of building occupiers and neighbours by only granting permission for development that does not cause harm to amenity.

### **When will a daylight/sunlight report be required?**

6.3 The Council expects that all developments receive adequate daylight and sunlight to support the activities taking place in that building.

6.4 A daylight and sunlight report should assess the impact of the development following the methodology set out in the most recent version of Building Research Establishment's (BRE) "Site layout planning for daylight and sunlight: A guide to good practice". Reports may be required for both minor and major applications depending on whether a proposal has the potential to reduce daylight and sunlight levels. The impact will be affected by the location of the proposed development and its proximity to, and position in relation to, nearby windows.



### WHAT DOES THE COUNCIL REQUIRE?

The Council will require a daylight and sunlight report to accompany planning applications for development that has the potential to reduce levels of daylight and sunlight on existing and future occupiers, near to and within the proposal site.

Daylight and sunlight reports should also demonstrate how you have taken into consideration the guidance contained in the BRE document on passive solar design; and have optimised solar gain. Please refer to the BRE guidance on daylight and sunlight.

- 6.5 While we strongly support the aims of the BRE methodology for assessing sunlight and daylight we will view the results flexibly and where appropriate we may accept alternative targets to address any special circumstances of a site. For example, to enable new development to respect the existing layout and form in some historic areas. This flexible approach is at the Council's discretion and any exception from the targets will be assessed on a case by case basis.

#### Daylight

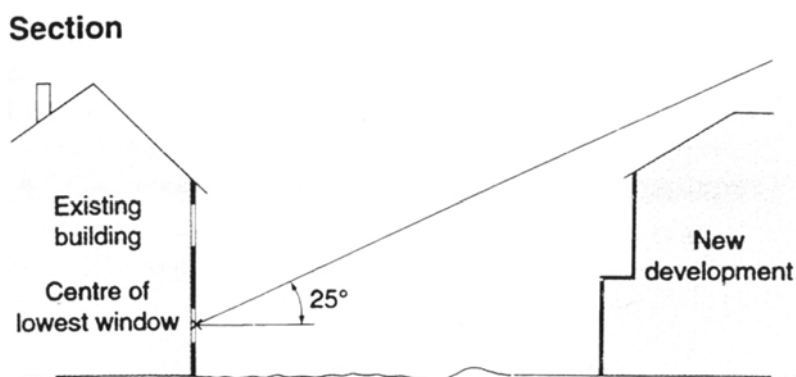
- 6.6 We will aim to minimise the impact of the loss of daylight caused by a development on the amenity of existing occupiers and ensure sufficient daylight to occupiers of new dwellings taking in account overall planning and site considerations. If your proposal will have an unreasonable impact on amenity the planning application will be refused. When assessing daylight issues, we will use the guidelines and methods contained in the BRE's *Site layout planning for daylight and sunlight: A guide to good practice*.
- 6.7 There are two quick methods that can be used to assess access to daylight:

#### Daylight to new development

- project a 25 degree line, starting 2m above ground level from a wall of your proposed development;
- if none of the existing surrounding buildings extend above this line, then there is potential for good daylighting to be achieved in the interior of your new development.

#### Daylight to existing development

- project a 25 degree line from the centre of the lowest window on the existing building;
- if the whole of your new development is lower than this line then it is unlikely to have a substantial effect on the daylight enjoyed by occupants in the existing building.



Source: BRE, Site layout planning for daylight and sunlight: A guide to good practice.

- 6.8 For either test, if buildings extend above the 25 degree line a more detailed test needs to be carried out to fully assess either the loss of daylight in existing buildings or the level of daylight achievable in the new development. The two most common measurements of daylight of the more detailed test are the Vertical Sky Component (VSC) and the Average Daylight Factor (ADF).

**Vertical Sky Component**

The amount of light striking the face of a window

- 6.9 The Vertical Sky Component is expressed as a ratio of the maximum value of daylight achievable for a completely unobstructed vertical wall. The maximum value is almost 40%. This is because daylight hitting a window can only come from one direction immediately halving the available light. The value is limited further by the angle of the sun. This is why if the VSC is greater than 27% enough sunlight should be reaching the existing window. Any reduction below this level should be kept to minimum.
- 6.10 Windows to some existing rooms may already fail to achieve this target under existing conditions. In these circumstances it is possible to accept a reduction to the existing level of daylight to no less than 80% of its former value. Any greater reduction than this is likely to have a noticeable affect on amenity. If this occurs then applications may be refused.

**Average Daylight Factor**

Average Daylight Factor is a measure of the level daylight in a room. It can be used to establish whether a room will have a predominantly daylit appearance. It provides light levels below which a room should not fall even if electric lighting is provided.

- 6.11 The Average Daylight Factor can be used as a measure to determine whether a room will receive adequate daylight (expressed as a percentage). The ADV takes into account the:
- net glazed area of windows;

- the total area of the room surfaces (ceiling, floor, walls, and windows);
  - the average reflectance; and
  - the angle of visible sky.
- 6.12 If a predominately daylit appearance is required, then the daylight factor should be 5% or more if there is no supplementary electric lighting, or 2% or more if supplementary electric lighting is provided. This figure should be as high as possible to enable occupiers to rely on as much natural light and not use artificial lighting, but as a minimum for dwellings the figures should be 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.
- 6.13 These minimum figures may not be applicable when measuring the impact of new buildings on existing dwellings as the simple preservation of minimum ADFs will not necessarily be seen as an indication of acceptability, especially if the VSC demonstrates a significant worsening in daylight levels. For existing dwellings the Council will consider the overall loss of daylight as opposed to the minimum acceptable levels of daylight. As the BRE guidance suggests, the readings will be interpreted flexibly as their aim is to support rather than constrain natural lighting. However, daylight is only one of the many factors in site layout design. Therefore, when applying these standards in Camden, we will take into consideration other site factors and constraints.
- 6.14 The calculation of the VSC and the ADF is complex. For full details on how these calculations are carried out you should refer to the most up to date version the BRE's "Site layout planning for daylight and sunlight: A guide to good practice". For more complex and larger developments we will expect a daylight study to be submitted with the planning application showing the windows that will be affected and provide before development and post development figures for VSC and ADF.
- 6.15 Other methods can be used to measure daylight and these can be incorporated in daylight and sunlight reports, where necessary, as a supplement to VSC and ADF measurements, such as the No Sky Line (NSL) test contained within BRE guidance.

### **Sunlight**

- 6.16 The design of your development should aim to maximise the amount of sunlight into rooms without overheating the space and to minimise overshadowing.

**WHAT DOES THE COUNCIL EXPECT?**

New developments should be designed to provide at least one window to a habitable space facing within 90 degrees of south, where practical. This window should receive at least 25% of Annual Probable Sunlight Hours, including at least 5% of Annual Probable Sunlight Hours between 21 September and 21 March, where possible.

**Annual Probable Sunlight Hours**

The annual amount of sunlight a window receives in an average year.

- 6.17 The BRE's "Site layout planning for daylight and sunlight: A guide to good practice" provides guidance on access to sunlight in relation to:
- site layout, building orientation and overshadowing for new buildings;
  - protecting sunlight to existing buildings, and
  - new and existing gardens and open spaces.
- 6.18 Design for access to sunlight will be specific to the orientation of your site, and the specific design and uses within your proposed development. You should follow the detailed design requirements recommended in the "Sunlighting" section of the BRE document. The Council recognises that not all of the guidance contained within the BRE document, particularly orientation, can be adhered to in all developments due to the dense and constrained urban nature of Camden.

**Other considerations****Right to Light**

- 6.19 The right to light is a legal right which one property may acquire over the land of another. If a structure is erected which reduces the light to an unobstructed property to below sufficient levels this right is infringed. A right to light can come into existence if it has been enjoyed uninterrupted for 20 years or more, granted by deed, or registered under the Rights of Light Act 1959. Planning permission does not override a legal right to light, however where a right to light is claimed, this is a matter of property law, rather than planning law. The Council will have no role or interest in any private dispute arising and it will be for the owner or occupier affected to seek a legal remedy.

**Supporting documents**

- 6.20 For further information on daylight and sunlight please refer to:  
Building Research Establishment (BRE). Site layout planning for daylight and sunlight: A guide to good practice.  
Copies of this are available directly from BRE.

BRE Bookshop, 151 Roseberry Avenue, London, EC1R 4GB  
020 7505 6622  
brebookshop@emap.com  
[www.constructionplus.co.uk](http://www.constructionplus.co.uk)

## 7 Overlooking, privacy and outlook

### KEY MESSAGES:

- Development are to be designed to protect the privacy of existing dwellings;
- Mitigation measures are to be included when overlooking is unavoidable;
- Outlook from new developments should be designed to be pleasant;
- Public spaces benefit from overlooking as natural surveillance.

- 7.1 This section aims to ensure that when designing your development you successfully consider the potential impact on the privacy and outlook of neighbouring properties.
- 7.2 This guidance relates to Core Strategy policy CS5 Managing the Impact of Growth and Development and Core Strategy policy CS14 Promoting high quality places and conserving our heritage.
- 7.3 Policy *DP26 – Managing the impact of development on occupiers and neighbours* of the Camden Development Policies outlines how the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.

### Overlooking and privacy

- 7.4 Development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. Spaces that are overlooked lack privacy. Therefore, new buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. The most sensitive areas to overlooking are:
- Living rooms;
  - Bedrooms;
  - Kitchens; and
  - The part of a garden nearest to the house.

### WHAT IS GOOD PRACTICE?

To ensure privacy, there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other. This minimum requirement will be the distance between the two closest points on each building (including balconies).

- 7.5 Where this standard cannot be met we may require you to incorporate some of the following design measures into your scheme to ensure

overlooking is reduced to an acceptable level. Design measures to reduce the potential for overlooking and the loss of privacy include:

- Careful consideration of the location of your development, including the position of rooms;
- Careful consideration of the location, orientation and size of windows depending on the uses of the rooms;
- Use of obscure glazing;
- Screening by walls or fencing; and
- Screening by other structures or landscaping.

7.6 Where landscaping is used as a method of screening, arrangements for ongoing maintenance should be put in place and this may be secured by a planning condition.

7.7 Public spaces and communal areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide.

### **Outlook**

7.8 Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. How pleasant an outlook is depends on what is being viewed. For example, an outlook onto amenity space is more pleasant than an outlook across a servicing yard. You should design developments so that the occupiers have a pleasant outlook. You should screen any unpleasant features with permanent landscaping.

7.9 When designing your development you should also ensure the proximity, size or cumulative effect of any structures do not have an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers. You should carefully consider the location of bin or cycle stores if they are in close proximity to windows or spaces used by occupiers.

7.10 You should take particular care if your development adjoins properties with a single aspect over your development.

7.11 You should note that the specific view from a property is not protected as this is not a material planning consideration.

### **Further information**

*Better Places to Live: By Design - A companion guide to PPG3* (ODPM) makes number of design recommendations which recognise the importance of privacy in the home.

*Perceptions of Privacy and Density in Housing* report available from Design for Homes; 0870 416 3378 or [www.designforhomes.org](http://www.designforhomes.org). This report highlights some of the issues facing households living at higher densities, and the implications for future design of buildings.