

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

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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has also consulted on other amendments to CPG2 relating to "affordable rent", which have not yet been adopted or withdrawn, and will be considered when the Mayor of London has determined how early alterations to the London Plan will be taken forward.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

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 affordable 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</u> indicates that affordable housing should: <ul style="list-style-type: none"> • <u>be provided to meet the needs</u> of households whose needs are not met by the market and who are eligible for affordable housing, and

Paragraph / reference	Draft amendment																				
	<ul style="list-style-type: none"> 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 remain at an affordable price for future eligible households unless arrangements are in place for subsidies to be recycled into alternative affordable housing provision. 																				
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 Two types of affordable housing are defined in the NPPF PPS3 – these are social rented housing, affordable rented housing and intermediate affordable housing . The Government intends to introduce a third type known as affordable rented housing.																				
Para 2.14	Social rented housing 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>Housing costs in Camden 2008</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
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Paragraph / reference	Draft amendment
<p>New paras 2.14a, 2.14b etc after para 2.14</p>	<p>Affordable rented housing 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 genuinely affordable rented housing 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 affordable housing can include a range of tenures such as:</p> <ul style="list-style-type: none"> • rented housing; • shared-ownership housing (where occupiers buy a share and rent the remainder) and; • low cost homes for sale.
Para 2.16	<p>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 2012 2014 review indicates <u>indicated</u> that eligible households eligible for intermediate homes with two bedrooms or less are <u>were</u> those with incomes of less than £64,300 <u>£64,000</u> 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 three 2-bedrooms or more is <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>) 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</p> <ul style="list-style-type: none"> • 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.
Para 2.19	<p>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.</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 affordable) 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>Mix of social rented housing and intermediate <u>different affordable housing types</u></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 affordable housing in terms of net internal floorspace.</p>
<p>Para 2.43 (now 2.44)</p>	<p>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 <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>parts of the borough). The Council will not is unlikely to support proposals for affordable rented homes that would be more expensive than market homes available anywhere 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 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% <u>30% social rented: 30% genuinely affordable rented: 40% intermediate affordable split</u> include:</p> <ul style="list-style-type: none"> • providing flexibility for up to 100% social and <u>genuinely affordable rented housing (combined)</u> or 100% intermediate affordable housing where the overall proportion of affordable housing in the scheme is substantially over 50%; • 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; • providing flexibility for more than 40% intermediate affordable 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 • providing flexibility for more than 60% social rented <u>and genuinely affordable rented housing (combined)</u> where high

Paragraph / reference	Draft amendment
	residential land values will make intermediate affordable 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 two <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 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.</p>
Figure 3	<p>Mix of social rented <u>and affordable</u> rented housing</p> <p>Overall aim: 50% of homes <u>to be social rented homes with 3 bedrooms or more</u></p> <p>Preferred mix:</p> <ul style="list-style-type: none"> • 1-bedroom homes – no more than 20%, <u>may be provided at genuinely affordable rents</u> • 2-bedroom homes – 30%, <u>may be provided at genuinely affordable rents</u> • 3-bedroom homes – 30%, or 50% if no <u>larger 4-bedroom</u> homes are provided, <u>should be provided at social rents</u> • 4 bedrooms homes • <u>4 bedrooms or more</u> – 20%, <u>should be provided at social rents</u> <p>Other objectives:</p> <ul style="list-style-type: none"> • Social rented <u>and affordable rented</u> 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 social rented homes with physically separate kitchens and living areas. • 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.

Paragraph / reference	Draft amendment
Figure 4	<p>Mix of intermediate affordable housing</p> <p>Overall aim: 10% of homes with 3 bedrooms or more</p> <p>Preferred mix:</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"> • 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 • 1-bedroom homes – a proportion is expected in all schemes • 2-bedroom homes – a proportion is expected in all schemes • 3-bedrooms or more – 10% or more where it is possible to provide them within cost limits <p>Other objectives:</p> <ul style="list-style-type: none"> • We will seek the design of 20% of 2 bedroom intermediate homes with physically separate kitchens and living areas. <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> 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.</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> and a high proportion of social rented homes <u>with that all have three bedrooms or more.</u> Such schemes</p>

Paragraph / reference	Draft amendment
	can potentially meet our dwelling size priorities while limiting the cost of the intermediate affordable 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"> • identifying all affordable homes in the development • specifying which homes will be social rented housing, <u>which will be genuinely affordable rented</u> and which homes will be intermediate affordable-housing • defining social rented housing in terms of the Government's national rent regime • defining intermediate affordable 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 <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> • identifying social rented, <u>genuinely affordable rented</u> and intermediate affordable wheelchair homes...

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

4 Noise and vibration

KEY MESSAGES:

We will ensure that noise and vibration is controlled and managed to:

- Limit the impact of existing noise and vibration sources on new development; and
- Limit noise and vibration emissions from new development.

- 4.1 The impact of noise and vibration can have a major affect on amenity and health and can severely affect people's quality of life.
- 4.2 Policy *DP28 – Noise and Vibration* of the Camden Development Policies aims to ensure that noise and vibration is controlled and managed. It sets out the Council's thresholds for noise and vibration and goes beyond the thresholds set out in Planning Policy Guidance 24: Planning and noise (see below). DP28 contains noise/vibration thresholds for the day, evening and night.



How can the impact of noise and vibration be minimised?

4.3 The main sources of noise and vibration in Camden are generated from:

- Road traffic;
- Railways;
- Industrial uses;
- Plant and mechanical equipment;
- Entertainment uses (such as bars and nightclubs); and
- Building sites.

4.4 For details on how to manage noise and vibration from building sites see section 8 on Construction management plans.

Ways to minimise the impact of noise on your development

Design

- Locating noise sensitive areas/rooms away from the parts of the site most exposed to noises;
- Creating set backs;
- Designing the building so its shape and orientation reflect noise and protect the most sensitive uses;
- Stacking similar rooms (such as kitchens and living rooms) above each other; and
- Positioning non-residential uses closer to the noise source in mixed use developments.

Built fabric

- Insulating and soundproofing doors, walls, windows, floors and ceilings;
- Sealing air gaps around windows;
- Double glazing;
- Including architectural fins (where appropriate); and
- Laminated glass.

Landscaping and amenity areas

- Incorporating planting, landscaping, fencing/barriers and solid balconies to reflect sound.

4.5 Our preference for controlling noise:

- Begins with attempting to reduce noise at its source;
- Then to separate the development (or at least the sensitive parts e.g. habitable rooms) from the source or to use noise barriers; and

- Finally construction materials such as acoustic glazing should be used.

- 4.6 When you consider measures to minimise noise and vibration you also need to take into account our policies on design and crime prevention. You should consider the implications of noise and vibration at the beginning of the design process to enable prevention or mitigation measures to be designed into the scheme. Poorly designed schemes will not be acceptable.
- 4.7 Proposals will be expected to include appropriate attenuation to alleviate or mitigate the impact of noise and vibrations to an acceptable level, as set out in policy *DP28 – Noise and vibration* of the Camden Development Policies. Where appropriate, the Council will consider the cumulative impact of noise sources (for example, air conditioning units).
- 4.8 Everyday domestic activities can also generate noise, e.g. communal entrances and roof terraces. Sufficient sound insulation must be provided between dwellings to prevent the transmission of noise between them, particularly in conversions where new partition walls are often deficient in terms of insulation.

Ways to mitigate noise emitted by your development

Engineering

- Reducing the noise emitted at its point of generation (e.g. by using quiet machines and/or quiet methods of working);
- Containing the noise generating equipment (e.g. by insulating buildings which house machinery and/or providing purpose-built barriers around the site); and
- Protecting any surrounding noise-sensitive buildings (e.g. by improving sound insulation in these buildings and/or screening them by purpose-built barriers).

Layout

- Ensuring an adequate distance between source and noise-sensitive buildings or areas; and
- Screening by natural barriers, buildings, or non-critical rooms in the development.

Administrative

- Limiting the operating time of the source;
- Restricting activities allowed on the site; and
- Specifying an acceptable noise limit.

- 4.9 If your proposal could result in noise and vibration that would cause an unacceptable impact to nearby uses or occupiers, or proposes sensitive uses near a source of noise or vibration and cannot be adequately attenuated then planning permission is likely to be refused.

Developments will be assessed against the thresholds set out in policy DP28.

How will the Council manage the impact of noise and vibration?

- 4.10 Detailed acoustic/noise and vibration information in the form of a report will be required if your development proposes:
- The installation of plant, ventilation or air conditioning equipment;
 - A use that will create significant noise (e.g. new industry, nightclub)
 - A noise-sensitive development in an area where existing noise sources are present (e.g. an existing industrial site, busy road, railway line);
 - A use that will generate a significant amount of traffic.

Noise sensitive developments

Those developments located near sources of noise, including housing, schools and hospitals as well as offices, workshops and open spaces.

- 4.11 The list above is a guide only and you may need to provide noise and vibration information for other developments depending on the circumstances of the site or proposal.
- 4.12 The appropriate amount and detail of information required will depend on the specific circumstances of your proposal. At a minimum you will be expected to provide the following information to support your application:
- Description of the proposal;
 - Description of the site and surroundings, a site map showing noise and vibration sources, measurement locations and noise receivers;
 - Background noise levels;
 - Details of instruments and methodology used for noise measurements (including reasons for settings and descriptors used, calibration details);
 - Details of the plant or other source of noise and vibration both on plan and elevations and manufacturers specifications;
 - Noise or vibration output from proposed plant or other source of noise and vibration, including:
 - Noise or vibration levels;
 - Frequency of the output;
 - Length of time of the output;
 - Features of the noise or vibration e.g. impulses, distinguishable continuous tone, irregular bursts;
 - Manufacturers' specification of the plant, supporting structure, fixtures and finishes;

- Location of neighbouring windows (and use if applicable);
- Details of measures to mitigate noise or fume emissions and vibration;
- Details of any associated work including acoustic enclosures and/or screening;
- Cumulative noise levels of all the proposed and existing units;
- Hours/days of operation.

4.13 Where appropriate the Council will seek a legal agreement to control or reduce noise levels where this is unlikely to be met through the use of a condition attached to a planning permission.

Further information

PPG24	<p>Planning Policy Guidance Note 24: Planning and Noise provide Government guidance on noise. This guidance defines four Noise Exposure Categories (A-D) and outlines what should be done if your proposal falls into one of these categories. Advice is also provided on how to address noise issues and secure amelioration methods through the planning system.</p> <p>www.communities.gov.uk/publications/planningandbuilding/ppg24</p>
DEFRA	<p>The Department of Food, Environment and Rural Affairs provide a number of publications on noise and noise related issues.</p> <p>www.defra.gov.uk</p>
Camden Council website	<p>Camden's Environmental Health web pages provide strategic information on noise in Camden including the results of monitoring that has taken place</p> <p>www.camden.gov.uk/noise</p> <p>Also see <i>Camden's Guide for Contractors working in Camden</i> on the Camden website.</p>
The Mayor's Ambient Noise Strategy	<p>This provides details on the Mayor of London's approach to reducing noise in London.</p> <p>http://legacy.london.gov.uk/mayor/strategies/noise/docs/noise_strategy_all.pdf</p>

12 Planning for healthy communities

KEY MESSAGES:

- Planning has a significant role in improving health;
- Applicants should consider the impact of the development on health;
- Applicants should submit a completed health checklist with applications.

- 12.1 It is widely recognised that the health and well-being of individuals is directly influenced by a number of related factors. These include:
- housing;
 - employment;
 - education;
 - access to green and open spaces;
 - social capital and community cohesion;
 - climate change and sustainability;
 - community safety;
 - building and urban design;
 - air and noise pollution;
 - diet and food;
 - waste; and
 - other factors.
- 12.2 Planning and the built environment have a significant role in influencing, both directly and indirectly, all of these health determinants.
- 12.3 In the UK, the 2010 Marmot review, Fair Society and Healthy Lives, also identified a number of recommendations to help deliver one of its objectives to: create and develop healthy and sustainable places and communities. These include:
- active travel;
 - provision of good quality open and green spaces;
 - improving the food environment;
 - energy efficiency of housing; and
 - to fully integrate planning, transport, housing, environmental and health systems to address the social determinants of health.



- 12.4 Camden's Core Strategy reflects health across the strategy as a cross-cutting theme and so almost all the policies in the Core Strategy will have an impact on health. For example, the following policies all have an influence on health and well-being:
- CS6 - *Providing quality homes;*
 - CS15 - *Protecting and improving our parks and open spaces and encouraging diversity;* and
 - CS11 - *Promoting sustainable and efficient travel.*
- 12.5 Policy CS16 - *Improving health and well-being* brings these policies together to ensure they are all working to tackle health inequalities and improve well-being. CS16 also sets out how we will work with NHS Camden to improve and protect health and also support the provision of new health facilities.
- 12.6 The following Core Strategy policies are also relevant as they work together to promote health and improve well-being:
- CS8 - *Promoting a successful and inclusive Camden economy,*
 - CS10 - *Supporting community facilities and services,* and
 - CS17 - *Making Camden a safer place.*
- 12.7 The following policies of the Camden Development Policies are also relevant:
- DP15 - *Community and leisure uses;*
 - DP26 - *Managing the impact of development on occupiers and neighbours;* and
 - DP32 - *Air quality and Camden's Clear Zone.*

Creating healthy communities

- 12.8 Where possible developments should:
- Encourage walking and cycling;
 - Discourage car use to reduce emissions and accidents;

- Provide landscaping, planting and trees to improve air quality and quality of life;
- Provide adequate amenity space for visual and physical recreation;
- Ensure a mix of uses within or near the residential area to reduce the need to travel; and
- Improve the environmental quality of buildings to ensure buildings stay warm in winter and cool in summer.

The NHS Camden Health Checklist for Planning

- 12.9 This guidance is designed to complement policy 3.2 of the London Plan which requires Health Impact Assessments for major developments, and consideration of the health impacts of development to ensure major new development promotes public health within our borough.
- 12.10 The NHS Camden health checklist for planning has been developed to ensure that health is a key consideration within new developments. The checklist provides support and guidance for developers in order to maximise the health benefits of any scheme. The NHS Camden Health Checklist for Planning is contained in Appendix 1 of this section.
- 12.11 We will require a completed health checklist to be supplied alongside all applications for all developments which meet the following criteria:
- More than 10 residential units, including changes use and new dwellings
 - More than 1,000sq m of non-residential floor space
 - Loss/gain of D1 floorspace of more than 50sq m

Hot food takeaways (A5 uses)

- 12.12 The document *Healthy Weight, Healthy Lives: A Cross Government Strategy for England*, published by the government in January 2008 highlights the commitment to promoting healthier communities. A key element of this strategy is the promotion of healthier food choices. The document highlights the need for local authorities to manage the proliferation of fast food outlets as a means of combating their known adverse impact on community health.
- 12.13 Core Strategy policy CS7 and policy DP12 of the Camden Development Policies, along with Camden Planning Guidance 5 - Town Centres, Retail and Employment aim to manage the number and concentration of food, drink and entertainment uses, including hot food takeaways. The measures we use include:
- limiting the number of A5 units in centres and rows of shops (frontages);
 - preventing consecutive takeaway shops opening next to one another;
 - only allowing new A5 uses in appropriate locations where their impact can be minimised; and

- using legal obligations to ensure that impacts are controlled e.g. opening hours.

12.14 Please see section 5 on town centres, retail and entertainment uses in Camden Planning Guidance 5.

Assessing the requirement for new health facilities

12.15 Health facilities include hospital and other premises that provide health and medical services such as doctors, integrated care centres, polyclinics and dentists. Camden Core Strategy policy CS10 aims to ensure that sufficient community facilities (including health facilities) are provided to meet the needs of Camden's population. Policy CS16 specifically aims to ensure that there is adequate provision of health facilities in partnership with NHS Camden.

12.16 Part e) of CS10 expects development that increases the demand for community facilities and services to make appropriate contributions towards providing new facilities or improving existing facilities. These contributions could be financial or they could involve the direct (re)provision of health facilities within or near a proposed development site.

12.17 The Council will consult with NHS Camden to assess the appropriate level and type of contribution required to mitigate any health care impacts which might be generated by a development proposal. The Council will also have regard to the model commissioned by the Healthy Urban Development Unit (HUDU), updated October 2009. The model is designed to forecast the level of demand for health facilities that might result from a new development and the subsequent cost of provision. Large, strategic schemes will be expected to assess the impact of visitors and employees in addition to the new and existing resident population. In other cases, contributions will not normally be sought for developments of less than 10 residential units.

12.18 Please see Camden Planning Guidance 8 – *Planning obligations* for our detailed approach.

Further information

PPS1	PPS1 - Delivering Sustainable Development indicates that LDF policies should plan to protect human health and address accessibility for all members of the community to a range of facilities including health, leisure and community services. It also states that LDF documents should deliver safe, healthy and attractive places to live and support the promotion of health and wellbeing by making provision for physical activity.
PPS23	PPS 23 - Planning and Pollution Control states that potential health impacts arising from development can be a material consideration.
The London Plan	The London Plan (consolidated since 2004) published in 2008 recognises health as a key cross-cutting objective of the overall strategy. The Plan also contains the following relevant policies: <ul style="list-style-type: none"> • Policy 3A.20 Locations for health care • Policy 3A.21 Health objectives • Policy 3A.22 Medical excellence
Mayor's Guidance	<ul style="list-style-type: none"> • Health Issues in Planning: Best Practice Guidance (June 2007) – explains how planning decisions can directly and indirectly improve health and reduce health inequalities through a number of topics, e.g. housing, transport, employment and skills, education etc. • Sustainable design and Construction (May 2006) – recommends a number of building specific measures to benefit the health of occupants, e.g. improving internal air quality, ensuring sufficient levels of natural light etc.
CABE	Commission for Architecture and the Built Environment. (2009). Future health: sustainable places for health and wellbeing.
Key determinants of health	Search on the London Health Observatory: www.lho.org.uk
Healthy Urban Development Unit	Guidance on linking planning and health: www.healthyurbandevlopment.nhs.uk/pages/key_docs/key_documents_hudu.html

Appendix 1: NHS Camden health checklist for planning

Issue to address	Included in proposal/development	Provide details (Evidence from proposals)	Further action required	Relevant LDF policies
1.0 HEALTHCARE FACILITIES AND SERVICES				
1.1 Will the development increase demand on existing primary and secondary care health services?	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core strategy policy CS16
2.0 PHYSICAL ACTIVITY				
2.1 Do the proposals maximise physical activity opportunities? (Active travel; leisure facilities; access to green and open spaces; HomeZones; schools; business; Olympics etc)	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core Strategy policies, CS11, CS15, CS16 and Development Policies DP15, DP17, DP31
3.0 CRIME AND COMMUNITY SAFETY				
3.1 Have measures been taken to ensure that the proposals will not have a negative impact on crime and community safety? (Licensed premises; drugs & alcohol; road traffic injuries; etc.)	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core Strategy policy CS17
4.0 HOUSING				
4.1 Do the proposals include housing which is: affordable, in mixed use developments; mixed tenure (private, affordable, social); different sizes, accessible and suitable for all ages.	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core Strategy policy CS6 and Development Policies DP1-9
5.0 EMPLOYMENT AND TRAINING				
5.1 Do the proposals provide employment and training opportunities for local people?	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core Strategy policy CS8 and Development Policy DP13
6.0 EDUCATION				
6.1 If education facilities are provided, will they be designed to include wider community use and include green and open space?	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core Strategy policy CS10
7.0 NEIGHBOURHOOD AND BUILDING DESIGN				
7.1 Do the proposals include: accessible street designs for older people and people with mobility problems; and gardens allotments or play areas?	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core Strategy policies CS14 and CS15
7.2 Do proposals ensure that buildings are designed to maximise physical activity (positioning of stairwells, shower rooms, secure cycle parking etc)	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core Strategy policies CS11, CS16 and Development Policies DP6, DP17, DP24
8.0 CLIMATE CHANGE AND SUSTAINABILITY				
8.1 Do the proposals mitigate against a negative impact on the environment (noise & air quality; renewable energy; contaminated land; waste management etc.)	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			Core Strategy Policy CS13 and Development Policy DP22
9.0 FOOD				
9.1 Do the proposals include provision of affordable and nutritious food outlets, food growing and limit the proliferation of fast-food outlets?	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			CS16
10.0 WIDER ASSESSMENT				
10.1 Have the health impacts been considered as part of any other assessment? (SEA, HIA, IIA, EIA etc)	<input type="checkbox"/> Yes <input type="checkbox"/> No (if no, please indicate what further action will be required)			n/a