

Camden Planning Guidance

# Amenity

London Borough of Camden

CPG 6





## CPG6 Amenity

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# 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	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. <a href="http://www.communities.gov.uk/publications/planningandbuilding/ppg24">www.communities.gov.uk/publications/planningandbuilding/ppg24</a>
DEFRA	The Department of Food, Environment and Rural Affairs provide a number of publications on noise and noise related issues. <a href="http://www.defra.gov.uk">www.defra.gov.uk</a>
Camden Council website	Camden's Environmental Health web pages provide strategic information on noise in Camden including the results of monitoring that has taken place <a href="http://www.camden.gov.uk/noise">www.camden.gov.uk/noise</a> Also see <i>Camden's Guide for Contractors working in Camden</i> on the Camden website.
The Mayor's Ambient Noise Strategy	This provides details on the Mayor of London's approach to reducing noise in London. <a href="http://legacy.london.gov.uk/mayor/strategies/noise/docs/noise_strategy_all.pdf">http://legacy.london.gov.uk/mayor/strategies/noise/docs/noise_strategy_all.pdf</a>



## 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

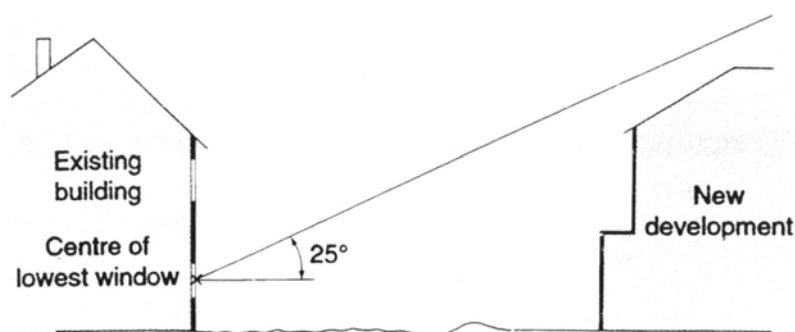
- 6.6 We will aim to minimise the impact of the loss of daylight caused by a development on the amenity of existing occupiers and ensure sufficient daylight to occupiers of new dwellings taking in account overall planning and site considerations. If your proposal will have an unreasonable impact on amenity 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.

**Section**

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.

## 8 Construction management plans

### KEY MESSAGES:

- Construction management plans are required for developments that are on constrained sites or are near vulnerable buildings or structures;
- They are essential to ensure developments do not damage nearby properties or the amenity of neighbours.

- 8.1 The purpose of this guidance is to give details on how construction management plans can be used to manage and mitigate the potential impacts of the construction phase of a development.
- 8.2 All construction and demolition work will cause at least some noise and disturbance. Where construction impact is particularly significant Camden will ensure it is managed through a legally binding construction management plan.
- 8.3 This guidance relates to Core Strategy Policy CS5 Managing the impact of growth and development and policies DP20 Movement of goods and materials, and DP26 Managing the impact of development on occupiers and neighbours of the Camden Development Policies.

### When does this guidance apply?

- 8.4 This guidance applies to all development proposals which, having regard to the nature of the surrounding area, are likely to give rise to significant noise and other disturbance during construction. Details on the circumstances in which the Council will expect construction management plans are set out within this guidance.

### How should construction management plans be prepared?

- 8.5 Camden's planning policies make it clear that the effect on local amenity and the highway network from construction and demolition is a material planning consideration. Construction management plans are used to set out the measures a developer should take (both on-site and off-site) in order to reasonably minimise and manage the detrimental effects of construction on local amenity and/or highway safety. Usually Camden will secure construction management plans through a Section 106 Agreement, although sometimes for less complicated schemes they may be secured by using a condition attached to planning permission.
- 8.6 Whilst construction management plans are a 'planning led' document they will incorporate mechanisms controlling planning considerations that overlap with other regulatory regimes (particularly highways and environmental protection). Hence, most construction management plans will be an umbrella document managing all impacts of the demolition, excavation and construction process.

- 8.7 Besides ensuring measures under these different regimes are coordinated in one document, construction management plans represent a proactive way of dealing with construction issues. They encourage developers to work with the Council and local people in managing the construction process with a view to ensuring that problems do not arise in the first place.

**Circumstances Camden will expect a construction management plan**

- 8.8 Whether a construction management plan is required for a particular scheme will be assessed on a case by case basis, although the Council will usually require a construction management plan for larger schemes (i.e. over 10 residential units or 1,000sq m of new commercial floorspace). However, occasionally a relatively large development will have comparatively little impact on its neighbourhood.
- 8.9 Conversely, small schemes on confined or inaccessible sites can have very significant impacts, particularly where the construction process will take place over a number of months (or even years) or outside normal working hours. When assessing smaller developments, special regard should be had to on-site factors that would seriously exacerbate the impact of the development works on the surrounding area. These could include development in residential areas, in close proximity to a school or a care home or very narrow or restricted site access (e.g. development in a mews with no footways). Regard will also be had to the nature and layout of a site. It will be much more difficult to fully absorb or contain the effects of demolition and construction in terms of noise, dust vibration etc within the boundaries of a small constrained site. Furthermore, lack of on-site space for plant, storage of materials and loading and unloading of construction may mean that construction effects will inevitably take place close to the boundary and spill out on to the highway network – a particular issue in much of Camden.
- 8.10 The types of schemes where a CMP will usually be appropriate include:
- Major developments (and some larger scale non major developments);
  - Development where the construction process has a significant impact on adjoining properties particularly on sensitive uses;
  - Developments which give rise to particular 'on-site' issues arising from the construction process (e.g. large scale demolition or complicated or intrusive remediation measures);
  - Basement developments;
  - Significant developments involving listed buildings or adjacent to listed buildings;
  - Developments that could seriously affect wildlife;
  - Developments that could cause significant disturbance due to their location or the anticipated length of the demolition, excavation or construction period;

- Development where site specific issues have arisen in the light of external consultation (where these are supported by objective evidence); and
- Development on sites where constraints arising from the layout or size of the site impact on the surrounding road network.

### **Contents of a construction management plan**

- 8.11 Any construction management plan will manage on-site impact arising from demolition and construction. It will also seek to establish control over construction traffic and how this integrates with other construction traffic in the area having regard to the cumulative effect.
- 8.12 A Section 106 or planning permission securing a construction management plan will contain provisions setting out in detail the measures the final version of the construction management plan should contain. Most construction management plans will be umbrella documents managing all impacts of the demolition, excavation and construction processes. This would include (but is not limited to) issues such as:
- Dust, noise and vibration on site and off site;
  - Traffic management highways safety and highways congestion;
  - Protection of listed buildings (if relevant);
  - Stability of adjacent properties;
  - Protection of any off-site features that may be damaged due to works;
  - Protection of biodiversity and trees; and
  - Preserve the amenity of surrounding residential and other sensitive uses.
- 8.13 A construction management plan is often split into two elements. The first element will be focussed on controlling environmental impacts, pollution and other non-highway related impacts arising from the scheme, having regard to the requirements of the Council's Considerate Contractor Manual and best practice guides from the GLA. In particular this will seek to control hours of operation and monitor and manage air quality, noise, dust and other emissions of other pollutants and location of equipment. The second element will be focussed on traffic control with a view to minimising disruption, setting out how construction work will be carried out and how this work will be serviced (e.g. delivery of materials, set down and collection of skips), with the objective of minimising traffic disruption and avoiding dangerous situations for pedestrians and other road users.
- 8.14 Sometimes the Section 106 will link the construction management plan with a requirement to convene a working group to act as a forum for the developer to meet with local residents and businesses to deal with construction issues as they arise.



- 8.15 Construction management plans will also have to be consistent with any other plans required for the development. For example, a Site Waste Management Plan, which is a legal requirement for works over a certain size which may require the re-use or recycling of materials on-site and therefore the construction management plan will have to reflect that space will be required to sort, store and perhaps crush or recycle materials.
- 8.16 The construction management plan should include the following statement:  
 “The agreed contents of the construction management plan must be complied with unless otherwise agreed with the Council. The project manager shall work with the Council to review this construction management plan if problems arise in relation to the construction of the development. Any future revised plan must be approved by the Council and complied with thereafter.”

### **Transport considerations**

- 8.17 The details contained within a construction management plan will relate to the nature and scale of the development, however, in terms of assessing the impact on transport the plan should demonstrate that the following has been considered and where necessary the impacts mitigated:
- a) Start and end dates for each phase of construction;
  - b) The proposed working hours;
  - c) The access arrangements for vehicles;
  - d) Proposed routes for vehicles between the site and the Transport for London Road Network (TLRN). Consideration should also be given to weight restrictions, low bridges and cumulative effects of construction on the highway;
  - e) Sizes of all vehicles and the frequency and times of day when they will need access to the site, for each phase of construction;
  - f) Swept path drawings for any tight manoeuvres on vehicle routes to the site;
  - g) Details (including accurate scaled drawings) of any highway works necessary to enable construction to take place;
  - h) Parking and loading arrangements of vehicles and delivery of materials and plant to the site;
  - i) Details of proposed parking bays suspensions and temporary traffic management orders;
  - j) Proposed overhang (if any) of the public highway (scaffolding, cranes etc);
  - k) Details of any temporary buildings outside the site boundary, or overhanging the highway;
  - l) Details of hoardings required or any other occupation of the public highway;

- m) Details of how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any banksman arrangements;
- n) Details of how traffic associated with the development will be managed in order to reduce congestion;
- o) Arrangements for controlling the movements of large/heavy goods vehicles on and in the immediate vicinity of the site, including arrangements for waiting, turning and reversing and the provision of banksmen, and measures to avoid obstruction of adjoining premises.
- p) Details of any other measures designed to reduce the impact of associated traffic (such as the use of construction material consolidation centres);
- q) Details of how any significant amounts of dirt or dust that may be spread onto the public highway will be cleaned or prevented;
- r) Details of any Construction Working Group that may be required, addressing the concerns of surrounding residents, as well as contact details for the person responsible for community liaison on behalf of the developer, and how these contact details will be advertised to the community;
- s) A statement confirming registration of the site with the Considerate Constructors Scheme;
- t) How the servicing approach takes into consideration the cumulative effects of other local developments with regard to traffic and transport;
- u) Provision for monitoring of the implementation of the CMP and review by the council during the course of construction works;
- v) Any other relevant information with regard to traffic and transport; and

### **Air quality and climate change considerations**

8.18 A method statement should be prepared and adopted as part of the construction management plan to minimise gaseous and particulate matter emissions generated during the Construction Phase. The following best practice measures shall be included in the method statement:

- Techniques to control PM<sub>10</sub> and NO<sub>x</sub> emissions from vehicles and plant;
- Techniques to control dust emissions from construction and demolition;
- Air quality monitoring; and
- Techniques to reduce CO<sub>2</sub> emissions from construction vehicles.

### **How will we secure construction management plans?**

8.19 Generally a Section 106 agreement (rather than a condition) is the most appropriate mechanism for securing a construction management plan. For larger schemes or developments on constrained sites within heavily

built-up areas where building activities could materially affect the highway construction management plans will always be secured through Section 106s. While the use of conditions is normally preferred to Section 106 Agreements, conditions can only be used to control matters on land within the developer's control. The range of matters typically covered by a CMP, particularly in relation to highways, mean that a Section 106 Agreement will be necessary in most cases.

- 8.20 The level of detail contained in a typical Section 106 also lends itself to the tailored, site-specific approach Camden uses for construction management plans. However, the use of a condition to secure a construction management plan may be sufficient for sites where the building activities associated with the build out can be totally accommodated within the site itself, particularly where these are smaller schemes.

## 9 Access for all

### KEY MESSAGES:

- Well designed, accessible buildings and spaces ensure that local services and facilities are accessible to everyone and increase equality of opportunity and social inclusion. We will seek to ensure the highest standards of access and inclusion in Camden's built environment and public realm.
- We expect all development of buildings and places, including changes of use and alterations to or refurbishment of existing buildings where practical and reasonable, to be designed to be accessible and useable by all to promote equality of opportunity.
- Access should be considered at the beginning of the design process.

- 9.1 A successfully accessible and inclusive environment is one that everyone can benefit from by being able to move freely, independently and uninhibited within the built environment regardless of age or disability.
- 9.2 This guidance applies to all development in Camden that may affect the accessibility of buildings and spaces.
- 9.3 All new developments should incorporate a suitable level of access for everyone and be inclusively designed.
- 9.4 Changes of use, alterations and extensions to existing buildings and spaces should, where practicable and reasonable, be designed to improve access for all.
- 9.5 The planning system is not able to require existing buildings or areas to retrospectively improve access where alterations are not being made.
- 9.6 For developments involving housing, reference should also be made to Camden Development Policies policy DP6 – *Lifetime homes & wheelchair housing* and Camden Planning Guidance on Lifetime homes and wheelchair housing. The accessibility needs are lower for certain sectors of the population, such as students, and so the Council will assess each development proposal on its own merits to determine a suitable level of accessible accommodation to be provided.
- 9.7 Guidance on the provision of parking spaces for drivers with disabilities is contained in Camden Planning Guidance on Vehicle access.
- 9.8 This guidance provides general advice on accessibility and advises on further sources of more detailed information. In particular this guidance relates to Core Strategy policy CS14 - *Promoting High Quality Places and conserving our heritage*; CS6 - *Providing quality homes* and policy DP29 - *Improving access* of the Camden Development Policies.
- 9.9 It is more effective to consider access arrangements from the beginning of the design process as they are an integral aspect of building design.

Overcoming access barriers at a later stage in the project can result in a building or space that is not inclusive and may be inaccessible to many people.

- 9.10 Applicants are advised to consult the Council’s Building Control Service at an early stage in the formulation of development proposals to ensure conformity with the relevant requirements relating to access. Satisfying some of the requirements of Part M of the building regulations can affect the size and design of the building and needs to be taken into account at the early design stage.
- 9.11 The following table sets out four key principles which, if put together successfully, should help create an accessible environment:





### **Additional information**

- 9.12 Level access should be provided to the principal entrance in all developments, and is a requirement for all new dwellings. Any new works must not make access any worse than what may have previously existed, in line with Approved Document M of the Building Regulations.
- 9.13 The design of routes around buildings should be clear and free from obstruction, especially to the entrance. Any obstructions should be made clear and avoidable, for example by changes in surface texture.
- 9.14 The above access principles apply mainly to non-residential developments – although the first two will also be applicable to residential developments. In the case of residential development, proposals must meet Lifetime Home Standards as set out in policy *DP6 – Lifetime Homes and wheelchair homes* of the Camden Development Policies. Reference should also be made to Camden Planning Guidance 2 and the section on Lifetime Homes and wheelchair housing.

### **Design and Access Statements**

- 9.15 A Design and Access Statement is a short written and illustrated report which accompanies and supports a planning application. It explains the thinking behind a design and its context in a proposal in a structured way. A Design and Access Statement should:
- Show how the applicant has analysed the site, its setting, and as a result of this assessment, formulated and applied design principles to achieve a good, inclusive design for buildings and public spaces;
  - Include the specific needs of disabled people, by showing how they have been integrated into the proposed development, and how inclusion will be maintained and managed; and
  - Be flexible, adaptable and be able to change with the design of the proposal should any amendments or changes occur.
- 9.16 The level of detail appropriate in an access statement will depend on the size, nature and complexity of the proposal, as a minimum, all should include:
- A short illustrated statement setting out the site and context appraisal, the purpose of the proposed development, a list of design principles and a description of the proposal explaining how the design responds to the appraisal and design principles;
  - A plan of the site, surrounding area or natural form and key features as identified in the appraisal;
  - Annotated sketches and photographs;
  - Important elements of the context that inform the design principles;
  - Plans and elevations of the proposal;
- 9.17 The following points should be taken into account when preparing a Design and Access statement:

- A brief explanation of the applicant's approach to access, with particular reference to the inclusion of disabled people;
- A description of how the sources of advice on accessibility and technical issues will be, or have been, followed;
- Details of any consultations undertaken or planned, including the number of users, particular user need groups (for example, visually impaired, deaf or hard of hearing, ethnic groups, people with learning disabilities and mental health) and the degree to which the process has been influenced by it;
- Details of any professional advice that has been followed, or will be sought, including recommendations from access audits or appraisals;
- An explanation of any specific issues affecting accessibility to, or within, the particular environment being considered, and/or service provision, employment or educational opportunities.
- Details of access solutions adopted to overcome any issues, including those which deviate from recognised good practice;
- Details of the management and maintenance practices adopted, or to be adopted, to maintain features enhancing accessibility (for example, lighting, colour and luminance contrast, door closing forces etc), specialist equipment (for example, induction loops, audible and visual fire alarm systems etc), and staff training; and
- A plan illustrating features such as routes in, out and around the outside of the building, vertical and horizontal circulation routes, positions of accessible car parking bays, the location of public transport, and any other features relevant to the proposal.

9.18 Where good practice cannot be met, the Access Statement should say why this is the case, set out the implications for users, and explain what other measures are being taken to ensure access is provided to the facilities available. See Further Information at the end of this section for links to more detailed guidance.

### **Listed buildings**

- 9.19 Design and access statements are also required for a listed building consent. Where a planning application is submitted in parallel with an application for listed building consent a single combined statement can be submitted which should address the requirements for both.
- 9.20 Measures to facilitate dignified and easy access to and within listed buildings can often be sensitively incorporated without damage to their special architectural or historic interest. However, the Disability Discrimination Act 1995 does not override other legislation such as listed building or planning legislation. Listed Building Consent will almost always be required for works to improve access and in formulating proposals; applicants are encouraged to undertake early discussions with the Council.

- 9.21 English Heritage has produced guidance on this topic titled Easy Access to Historic Buildings (see Further Information for the link). Additional information is also contained in Circular 01/06.

**Other considerations**

- 9.22 Applicants should note that Design and Access Statements differ from the requirements for Access statements set out in Approved Document M of the Building Regulations, which are only required when specific building control regulations can not be met. Approved Document M of the Building Regulations sets out the requirements to ensure access to and use of a building's facilities are accessible to all.
- 9.23 It may also be appropriate to combine the Design and Access Statements with other statements requested in other sections of Camden Planning Guidance, provided that the requirements of all such statements are adequately addressed.
- 9.24 Part 3 of the Disability Discrimination Act 1995 gives disabled people a right of access to goods, facilities and services. This requires service providers to:
- Alter a barrier feature so that it no longer has effect;
  - Provide a reasonable means of avoiding that feature; or
  - Provide a reasonable alternative method of making the service available.
- 9.25 These requirements apply to all buildings where services are provided to the public and to transportation infrastructure.

## Further information

Design and Access Statements	<p>Department for Communities and Local Government (March 2010) Guidance on information requirements and validation:  <a href="http://www.communities.gov.uk/publications/planningandbuilding/validationguidance">www.communities.gov.uk/publications/planningandbuilding/validationguidance</a></p> <p>ODPM publication: Planning and Access for Disabled People: A Good Practice Guide  <a href="http://www.communities.gov.uk/publications/planningandbuilding/planningaccess">www.communities.gov.uk/publications/planningandbuilding/planningaccess</a></p> <p>Department for Communities and Local Government Circular 01/2006: Guidance on Changes to the Development Control System: Section 3 provides guidance on the legislative position and information required  <a href="http://www.communities.gov.uk/publications/planningandbuilding/circularcommunities2">www.communities.gov.uk/publications/planningandbuilding/circularcommunities2</a></p> <p>The Commission for Architecture and the Built Environment (CABE) 'Design and access statements: how to write, read and use them'  <a href="http://www.cabe.org.uk">www.cabe.org.uk</a></p> <p>Mayor of London's Supplementary Planning Guidance: Accessible London: Achieving an Inclusive Environment  <a href="http://legacy.london.gov.uk/mayor/strategies/sds/docs/spg_accessible_london.pdf">http://legacy.london.gov.uk/mayor/strategies/sds/docs/spg_accessible_london.pdf</a></p>
Access and the historic environment	<p>English Heritage have published guidance on 'Easy Access to Historic Landscapes' and 'Easy Access to Historic Buildings' which can be found on their website at:  <a href="http://www.english-heritage.org.uk/publications/easy-access-to-historic-buildings/">www.english-heritage.org.uk/publications/easy-access-to-historic-buildings/</a></p>
Lifetime Homes and wheelchair housing standards	<p>Lifetime Homes  <a href="http://www.lifetimehomes.org.uk">www.lifetimehomes.org.uk</a></p> <p>Accessible London: Achieving an Inclusive Environment, GLA (April 2004)</p>

