

Camden Development Policies 2010-2025

Local Development Framework



**If you would like this document in large print
or Braille, or in another language, please
contact 020 7974 5615**

Find out more about this document and the LDF by visiting camden.gov.uk/ldf
or by calling the LDF hotline 020 7974 5615/2043.

Forward Planning
London Borough of Camden
Town Hall Extension
Argyle Street
London WC1H 8EQ

Published November 2010.

Camden's Local Development Framework. Development Policies.

DP4. Minimising the loss of affordable homes

- 4.1 Core Strategy policy CS6 sets out the Council's intention to minimise the loss of affordable homes. Policy DP4 provides more detail on our approach (while DP2 seeks to protect housing against development for non-residential uses). DP4 is concerned with the loss of affordable housing floorspace in all forms, but does not directly address accommodation for older people, homeless people or other vulnerable people. It will be used to assess proposals affecting self-contained affordable housing, and proposals involving the loss of certain key worker accommodation with shared facilities (hostels and ancillary accommodation for key-workers such as nurses). Policies DP7 and DP8 give detailed guidance for assessing proposals that affect sheltered housing and care homes for older people, and accommodation for homeless people and vulnerable people.

DP POLICY

DP4 – Minimising the loss of affordable homes

The Council will resist development that would involve a net loss of affordable housing floorspace, including any affordable housing that takes the form of:

- a) hostels, bedsits or other housing with shared facilities; or
- b) an ancillary element of another use, but only where the development involves changing the primary use or separating the housing floorspace from the primary use.

- 4.2 It is likely that the Council's investment in Decent Homes and its estate regeneration programme will involve redevelopment on some housing estates. Redevelopment proposals may also affect affordable housing provided by Housing Associations, employers and charitable or philanthropic bodies. In each case, we will expect the affordable housing floorspace to be re-provided in full, usually on-site and within the development. Replacement affordable housing may be provided on an alternative site provided that the replacement housing will:
- continue to give occupiers access to public transport, workplaces, shops, and community facilities, and
 - contribute to creating a mixed and inclusive community.
- 4.3 The estate regeneration programme is a long term strategy, and will involve relocating some occupiers while their homes are refurbished or redeveloped. Over the course of the programme, there may be redistribution of occupiers and of affordable housing floorspace from one part of an estate to another, or even from one estate to another. The Council will take a strategic approach to estate regeneration, taking into account the potential to attract investment and the benefits of mixed and inclusive communities. We will resist the loss of affordable housing floorspace across the programme as a whole, but may not resist localised or short-term losses provided a strategy is in place for their eventual replacement.
- 4.4 As noted in Core Strategy CS6 and policy DP5 below, there is a mismatch between the sizes of affordable housing most needed in Camden and the sizes available in the existing stock, with a particular shortage of affordable homes for large families. Therefore, policy DP4 protects affordable housing floorspace rather than seeking to retain each individual home, and provides for development that tailors the stock to meet existing and future needs. However, the Council will seek to ensure that arrangements are in place to re-house all existing occupiers.



- 4.5 Redevelopment of affordable housing should generally provide new social rented housing to replace existing social rented homes, and new intermediate affordable housing to replace existing intermediate affordable homes. However, if there is no longer a need for the type of stock being replaced (for example, where the existing stock contributes the over-supply of small social rented homes, or where employees that were previously housed are no longer part of the workforce), the Council may consider alternative proportions of social rented and intermediate housing, having regard to policy DP3 and paragraphs 3.22 – 3.23.
- 4.6 In the past, Camden had a significant stock of key-worker affordable housing that was not self-contained, in particular housing for student nurses and other healthcare staff. Some of this took the form of nurses' homes within hospital sites (and therefore were ancillary to Use Class C2), while some was provided as hostels located separately from the place of work. The demand for this particular form of housing has fallen because:
- nurses are no longer employed by NHS hospitals during their undergraduate training, and are not eligible for key-worker housing while they are students; and
 - a number of hospital trusts have arranged for their staff to have access to new Housing Association homes.
- Many nurses' homes and hostels have now been developed for other purposes, but some still exist, including newly developed staff housing at the Royal Free Hospital.
- 4.7 Similar considerations will apply to accommodation for nurses and subsidised accommodation for other workers such as caretakers. Where housing is ancillary to another use, such as a hospital, alterations between the proportion of floorspace in the main use and the ancillary housing use will generally be outside planning control. However, where development is subject to planning control, and affects affordable housing that is not self-contained, we will seek to ensure that this housing is retained or re-provided. The retained or replacement housing:
- should be available to the same group of occupiers or employees unless it is no longer needed by that group;
 - should be provided as social rented or intermediate affordable housing, subject to the considerations set out in paragraphs 3.22, 3.23 and 4.5; and
 - may be reconfigured or re-provided as self-contained housing if this does not compromise its affordability or prevent the needs of existing occupiers being met.
- 4.8 Housing and affordable housing required in association with mixed-use policy DP1 and affordable housing policy DP3 should be provided in addition to any retained or replacement affordable housing arising under policy DP4.

Key evidence and references

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing

DP5. Homes of different sizes

5.1 Core Strategy policy CS6 seeks to secure mixed and inclusive communities and a range of self-contained homes of different sizes. Our approach is informed by:

- the over-representation of small dwellings among Camden's existing homes;
- existing and projected household sizes in the borough;
- the Council's identified dwelling size priorities;
- the need for a range of homes accessible across the spectrum of incomes; and
- the housing needs of different groups.

Policy DP5 helps to implement this element of policy CS6 by setting out more detail on our approach to providing homes of different sizes.

5.2 Policy DP5 relates primarily to developments of self-contained houses and flats for general needs (Use Class C3). It will be used when assessing new build housing schemes, schemes to reconfigure or subdivide residential properties and to all changes of use to housing (in Use Class C3) from other uses. It will also be used when assessing development that creates self-contained homes from residential accommodation that is ancillary to another use. Policy DP5 will be applied to proposals for bedsits or other permanent housing with shared facilities if the development could be occupied lawfully as self-contained dwellings in Use Class C3 without submission of a further planning application (please see paragraphs 9.2 to 9.3 for more details).

5.3 Policy DP5 does not relate to developments that provide homes exclusively for older people, homeless people, vulnerable people or students (these are covered by policies DP7, DP8 and DP9). In such developments, the appropriateness of the proposed mix of dwelling sizes will be assessed in terms of the needs of the intended occupiers. However, all housing developments should contribute to the creation of mixed and inclusive communities. Therefore, it will often be appropriate for these dedicated housing types to be integrated into larger schemes that include general needs housing.

DP POLICY

DP5 – Homes of different sizes

The Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. We will:

- a) seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table, including conversion of existing residential and non-residential floorspace;
- b) expect a mix of large and small homes in all residential developments.

In considering the mix of dwelling sizes appropriate to a development, the Council will have regard to the different dwelling size priorities for social rented, intermediate affordable and market homes, and will take into account:

- c) the character of the development, the site and the area, including the impact of the mix on child density;
- d) site size, and any constraints on including homes of different sizes; and
- e) the economics and financial viability of the site, including the demand for homes of different sizes.

- 5.4 The Council has identified different dwelling size priorities for social rented housing, intermediate affordable housing and market housing on the basis of the factors noted in paragraph 5.1. These priorities are set out in Core Strategy paragraph 6.39, and also set out in the Dwelling Size Priorities Table below, with dwelling sizes expressed in terms of number of bedrooms. The Council's particular aims for the size of each of these housing types form the final column of the table, and also provide the basis for monitoring policy DP5. When assessing a proposal against policy DP5, the Council will consider small homes to be studio flats, one bedroom and two-bedroom homes (the need for self-contained studio flats has not been assessed separately from the need for 1-bedroom homes). The Council will consider large homes to be homes with 3-bedrooms or more.

Dwelling Size Priorities Table					
	1-bedroom (or studio)	2-bedrooms	3-bedrooms	4-bedrooms or more	Aim
Social rented	lower	medium	high	very high	50% large
Intermediate affordable	medium	high	high	high	10% large
Market	lower	very high	medium	medium	40% 2-bed

- 5.5 The Council acknowledges that there is a need and/ or demand for dwellings of every size shown in the Priorities Table. We expect most developments to include some homes that have not been given a priority level, and some homes that are identified as medium priority. However, the Council has prioritised some sizes as high or very high priority (primarily on the basis of a high level of need relative to supply). We will expect proposals to include some dwellings that meet the very high priorities wherever it is practicable to do so. We will seek to focus provision around the very high and high priority sizes by assessing dwelling mixes against the aims in the Priorities Table. The Council will aim for at least 50% of social rented dwellings and 10% of intermediate affordable dwellings in each scheme to be large homes with 3-bedrooms or more, and for at least 40% of market homes to contain 2-bedrooms (in each case, proportions will be calculated in terms of numbers of dwellings rather than floorspace).
- 5.6 Having regard to criteria (c), (d) and (e) in policy DP5, the Council acknowledges that it will not be appropriate for every development to meet the aims set out in the Priorities Table. However, we consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall, in accordance with criterion (b). Where possible a mix of large and small homes should be included within each category of housing provided (social rented, intermediate affordable and market). This will help ensure that each development provides some dwelling sizes that are high priorities and some that are not. The Council will resist development proposals for self-contained general needs housing that contain only one-bedroom and studio flats.
- 5.7 The Council will be flexible when assessing development against policy DP5, the dwelling size priority table, and the aims set out in paragraph 5.5. The mix of dwelling sizes appropriate in a specific development will be considered taking into account the character of the development, the site and the area. The following paragraphs set out a number of the relevant considerations.

Character of the development, the site and the area, and child density

- 5.8 Where a development involves re-use of an existing building, this may limit the potential to provide a range of dwelling sizes. Issues that can arise include the creation of access via an existing staircase or lift; respect for the integrity of existing structural walls and patterns of windows; changes in floor level; and heritage designations (listed building and conservation area status) that



may restrict alterations. The Council will have regard to these issues, alongside the expectations arising from development size, and other issues considered below.

- 5.9 Where a development is for the conversion of existing homes (including the creation of self-contained homes from residential accommodation that is ancillary to another use), the Council will seek to minimise the loss of dwelling sizes that are given a priority of medium or above in the dwelling size priorities table. In particular, conversions involving affordable housing should retain or re-provide any existing large affordable homes unless the creation of small homes will allow the release of other large affordable homes that are currently under-occupied. Conversion of market housing should also generally retain or re-provide existing 2-bedroom homes and should also include large homes. Conversions that involve the loss of existing homes should also comply with policy DP2.
- 5.10 When considering the proportion of large homes appropriate within a specific development, we will take account of any features that make the development particularly suitable for families with children. We will also take into account the flexibility that larger dwellings create for other types of households, allowing for arrangements such as shared households and adults caring for elderly or infirm relatives. Developments are particularly suitable for children to live in if they have:
- the potential to provide space on site where children can play (open space or private amenity space);
 - dedicated children's play space available nearby;
 - a number of homes with direct access to the street, private amenity space or open space;
 - no direct access to a major road;
 - a limited number of homes served from each internal corridor and each communal staircase or lift;
 - potential to provide a broad range of dwelling sizes in the development appropriate for new families with very young children and established families with older children.
- 5.11 Where some or all of the features listed in paragraph 5.10 are present, the Council will expect provision of a high proportion of large affordable homes, and expect inclusion of social-rented homes with 4-bedrooms or more (subject to policy DP3 on affordable housing). However, there are relatively few opportunities in Camden for housing development that will provide most of these features. Other ground floor uses often prevent direct access to the street, there are many major roads in the borough, and the cost of lifts is too high to share among a small number of homes. However, the Council does not consider that the absence of any or all of these features justifies the omission of large homes from a development. Developments should be arranged to provide access as directly as possible from large homes to the street entrance, external amenity space or open space. To provide for the minority ethnic mix in Camden, a proportion of large homes should have kitchens and food preparation areas that are physically separated from living areas. Please see our Camden Planning Guidance supplementary planning document for further details.

- 5.12 Child density is a measure of the number of children occupying a specific development or area. High child densities tend to arise where there is a high proportion of large affordable homes in a development, especially when these are social rented. In some circumstances, high child densities are associated with problems such as the use of communal areas as informal playgrounds, noise disturbance, graffiti and vandalism. When considering the proportion of large homes appropriate within a particular development, we will have regard to the child density in the surrounding area and the child density likely to arise in the development. We will also take account of the potential to use a management mechanism to control child densities, such as a sensitive lettings policy (these generally prevent all homes being occupied to their maximum capacity when they are first let).
- 5.13 A number of elements of good design are particularly relevant to considering the mix of dwelling sizes appropriate to a specific development proposal. The mix selected should achieve efficient layouts, in terms of the ratio of internal dwelling space to communal circulation space, and in terms of the proportion of the internal dwelling space that is usable. Where schemes include a number of floors, homes should be arranged to minimise noise disturbance, avoiding situations where bathrooms, living rooms and kitchens are directly above or below bedrooms. Homes where all windows face a single direction should also be avoided, especially in the case of large homes.

Development economics, financial viability, and demand

- 5.14 As set out in paragraphs 6.56 and 6.57 under Camden Core Strategy section CS6, the Council intends to be flexible in pursuit of its policy objectives, and will take into account the findings of our monitoring of housing supply in the light of economic circumstances. These paragraphs note specifically that the Council may vary the range of home sizes sought in order to maximise housing delivery.
- 5.15 At some times, and in some parts of the borough, the demand for large market homes may be higher than the demand for small ones, and vice versa. Market homes of some sizes can therefore generate a premium in terms of their value per square metre. The value of affordable housing may also vary depending on its size. Large affordable homes may have a lower value per square metre than small ones if grant from the Homes and Communities Agency or rental payments by the occupiers do not reflect the higher costs of providing them. The Council recognises that the rigid application of dwelling size priorities can prejudice the financial viability of a development in these cases, and will consider the appropriate mix of dwellings having regard to their value and the potential to maximise the proportion of affordable housing on the site.
- 5.16 The Council also recognises market housing and intermediate affordable housing will often be too expensive for many households who need large homes. Average house prices in Camden were well over twice the national average in 2007 (Camden Housing Needs Survey Update 2008). The affordability issues affecting large market and intermediate affordable homes have been considered in setting our dwelling size priorities, but will they will also be taken into account when considering the mix of homes appropriate for individual schemes.





- 5.17 Affordability and funding concerns may sometimes be resolved by adapting the tenure of intermediate or market housing (subject to the limits on Council control over tenure). In the intermediate sector, large homes for shared-ownership may be more appropriate where property values are relatively low, and large homes for rent may be more appropriate where development costs are relatively high. In the market sector, 3-bedroom homes may be accessible to a wider range of households if they are made available to rent. The Council will take account of affordability, funding concerns, and the impact of different tenures when seeking its priority dwelling sizes in particular schemes.
- 5.18 More detailed guidance on the preferred affordable housing mix is contained in our Camden Planning Guidance supplementary planning document. The Council produces residential space standards that indicate the amount of internal space appropriate for dwellings intended to accommodate different numbers of occupiers. These are also set out in Camden Planning Guidance.

Key evidence and references

- Camden Housing Needs Study Update 2008
- Greater London Strategic Housing Market Assessment 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing

DP6. Lifetime homes and wheelchair housing

- 6.1 Core Strategy policy CS6 indicates that Council will seek a variety of housing types suitable for people with mobility difficulties. Policy DP6 helps to deliver this by setting out our approach to lifetime homes and wheelchair housing.
- 6.2 Although mobility difficulties should be considered in the design of all forms of housing, the standards for lifetime homes and wheelchair accessibility relate primarily to the layout of self-contained homes. As occupants of student housing will only stay for a limited period, student housing is not expected to meet lifetime homes standards. The proportion of students who are wheelchair users should reflect the general population, therefore the Council expects 10% of student flats or study-bedrooms (together with supporting communal spaces) to meet wheelchair standards.

DP POLICY

DP6 – Lifetime homes and wheelchair housing

All housing development should meet lifetime homes standards. 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them.

- 6.3 The Council considers that people with mobility difficulties, including disabled people, should have access to a range of housing types that match the range available to those without mobility constraints. Mobility difficulties can affect children, young people, adults and older people. They can affect people who live in large families, small households and people living alone. Where people have support needs related entirely to a physical disability, the Council will seek to provide them with support in their own home.
- 6.4 A lifetime home supports the changing needs of a family's lifecycle, from raising children through to mobility issues in old age, essentially allowing people to live in their home for as much of their life as possible. Lifetime homes involve design features that have been tailored to foster accessible living, helping to accommodate old age, injury, disability, pregnancy and pushchairs. These features also allow a dwelling to be easily adapted for even higher levels of accessibility in the future, if the need arises. Lifetime homes exceed the requirements of Part M of the Building Regulations.
- 6.5 Lifetime homes standards will be applied to all developments of self-contained housing, including conversions, reconfigurations and changes of use (the standards do not apply to student housing). The standards will also be applied to proposals for bedsits or other permanent housing with shared facilities if the development could be occupied lawfully as self-contained dwellings in Use Class C3 without submission of a further planning application (please see paragraphs 9.2 to 9.3 for more details). The Council acknowledges that the design or nature of some existing properties means that it will not be possible to meet every element of the lifetime homes standard, for example in listed buildings, but considers that each scheme should achieve as many features as possible. All housing proposals should be accompanied by a submission showing how each of the lifetime homes standards will be met, with a full justification why any individual element will not be met. New build schemes are expected to incorporate all lifetime homes features. Further information on lifetime homes can be found in our Camden Planning Guidance supplementary planning document.
- 6.6 To provide independence and quality of life for wheelchair users, the Council will expect 10% of dwellings either to meet wheelchair housing standards, or be designed so a future occupier can easily adapt the dwelling to meet wheelchair housing standards. The percentage will be applied to all developments providing 10 or more self-contained homes, including conversions, reconfigurations and changes of use, and will also be applied to student housing. The percentage



will also be applied to proposals for bedsits or other permanent housing with shared facilities if the development could be lawfully occupied as 10 or more self-contained dwellings in Use Class C3 without submission of a further planning application (please see paragraphs 9.2 to 9.3 for more details). However, where proposals involve re-use of an existing building (particularly a listed building), the percentage will be applied flexibly taking into account of any constraints that limit adaptation to provide entrances and circulation spaces that are level and wide enough for a wheelchair user.

- 6.7 Ideally, wheelchair housing should be tailored to the specific needs of an individual wheelchair user and their household. Although tailoring housing to the occupier is rarely possible in proposals for speculative market housing, it can be achieved for affordable housing, where future occupiers can be identified by local housing managers, from the Housing Register (waiting list), and from transfer lists.
- 6.8 The Council will apply the wheelchair housing percentage across each affordability category in a scheme, generally seeking 10% of market housing, 10% of social housing and 10% of intermediate housing. For the 10% of market housing, future occupiers will often be unknown until after the homes have been fitted out. Where the 10% market housing is not fully fitted-out to meet the standards, it should be laid out to provide all the necessary circulation space within and between rooms, including bathrooms and toilets, as subsequent changes to these arrangements can be costly and difficult.
- 6.9 For social rented housing and intermediate housing, each type should include 10% of homes designed, built and fitted-out to meet wheelchair housing standards. The Council may use its affordable housing fund to support the creation of fully-fitted out affordable wheelchair accessible housing. We may seek to increase the percentage of affordable wheelchair accessible homes and reduce the percentage of market wheelchair accessible homes where this will enable us to meet the needs of identified future affordable housing occupiers. We may also agree to increase the percentage of social rented wheelchair homes and reduce the percentage of intermediate affordable wheelchair homes (or vice versa) where this will better enable us to meet the needs of identified future occupiers. More detailed information is included in our Camden Planning Guidance supplementary development document.

Key evidence and references

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Accessible London: achieving an inclusive environment – London Plan Supplementary Planning Guidance; Mayor of London; 2004