

Camden Planning Guidance

# Design<sub>CPG</sub> 1

London Borough of Camden

July 2015 Updated March 2018



## CPG1 Design

1 Introduction.....	3
2 Design excellence .....	5
3 Heritage.....	10
4 Extensions, alterations and conservatories.....	23
5 Roofs, terraces and balconies .....	32
6 Landscape design and trees.....	40
7 Shopfronts .....	51
8 Advertisements, signs and hoardings .....	65
9 Designing safer environments .....	69
10 Recycling and Waste Storage.....	78
11 Building services equipment .....	86
12 Artworks, statues and memorials .....	88

# 1 Introduction

## What is Camden Planning Guidance?

- 1.1 We have prepared this Camden Planning Guidance to support the policies in our Local Plan ~~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 adopted CPG1 Design on 6 April 2011 following statutory consultation. This document was updated in 2013 to include Section 12 on artworks, statues and memorials, updated in 2015 to revise the guidance for recycling and waste storage and updated in March 2018 to remove the advertisement section to CPG Advertisement 2018. Details on these updates and the consultation process are available at [camden.gov.uk/cpg](http://camden.gov.uk/cpg).
- 1.2 The Camden Planning Guidance covers a range of topics (such as housing, sustainability, amenity and planning obligations) and so all of the sections should be read in conjunction, and within the context of Camden’s LDF.

## Design in Camden

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

### **What does this guidance cover?**

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

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

1.6 This guidance supports the following Local Development Framework policies:

#### **Core Strategy**

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

#### **Development Policies**

- DP24 Securing high quality design
- DP25 Conserving Camden's heritage
- DP27 Basements and lightwells
- DP29 Improving access
- DP30 Shopfronts

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

## 2 Design excellence

### KEY MESSAGES

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

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

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



### When does this apply?

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

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

## General guidance on design

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



## Context

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

## **Building design**

### 2.10 Good design should:

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

## **Land use**

### 2.11 The use of a building should:

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

## **Materials**

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

## **Tall buildings**

- 2.13 Tall buildings in Camden (i.e. those which are substantially taller than their neighbours and/or which significantly change the skyline) will be assessed against a range of design issues, including:

- how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape, and how the top of a tall building affects the skyline;
- the contribution a building makes to pedestrian permeability and improved public accessibility;

- the relationship between the building and hills and views;
  - the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
  - the historic context of the building's surroundings.
- 2.14 In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability. Reference should be made to this CPG (Heritage chapter), CPG3 Sustainability (Climate change adaptation chapter) and CPG6 Protecting and improving quality of life (Overlooking and privacy and Wind/microclimate chapters).
- 2.15 Where a proposal includes a development that creates a landmark or visual statement, particular care must be taken to ensure that the location is appropriate (such as a particular destination within a townscape, or a particular functional node) and that the development is sensitive to its wider context. This will be especially important where the development is likely to impact upon heritage assets and their settings (including protected views).
- 2.16 Design should consider safety and access. Guidance on these issues is contained within this CPG (Designing safer environments chapter) and CPG4 Protecting and improving quality of life (Access for all chapter). Schemes over 90m should be referred to the Civil Aviation Authority.

### **Design of public space**

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

### **Design and access statements**

- 2.21 Design and Access Statements are documents that explain the design ideas and rationale behind a scheme. They should show that you have thought carefully about how everyone, including disabled people, older people and children, will be able to use the places you want to build.



2.22 Design and Access Statements should include a written description and justification of the planning application and sometimes photos, maps and drawings may be useful to further illustrate the points made. The length and detail of a Design and Access Statement should be related to the related to the size and complexity of the scheme. A statement for a major development is likely to be much longer than one for a small scheme.

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

### Further information

General	By Design: Urban Design in the Planning System – Towards Better Practice, DETR/CABE, 2000 Design and Access Statements; how to read, write and use them, CABE, 2007
Tall Buildings	Guidance on tall buildings, English Heritage/CABE, 2007
Historic Environment	Understanding Place: conservation areas designation, appraisal and management (2011) Building in Context, English Heritage/CABE, 2002. Seeing History in the View (2011) Good Practice Advice 3- Settings and Views (2015)
Other	Royal Institute of Chartered Surveyors (RICS); and Royal Institute of British Architects (RIBA).

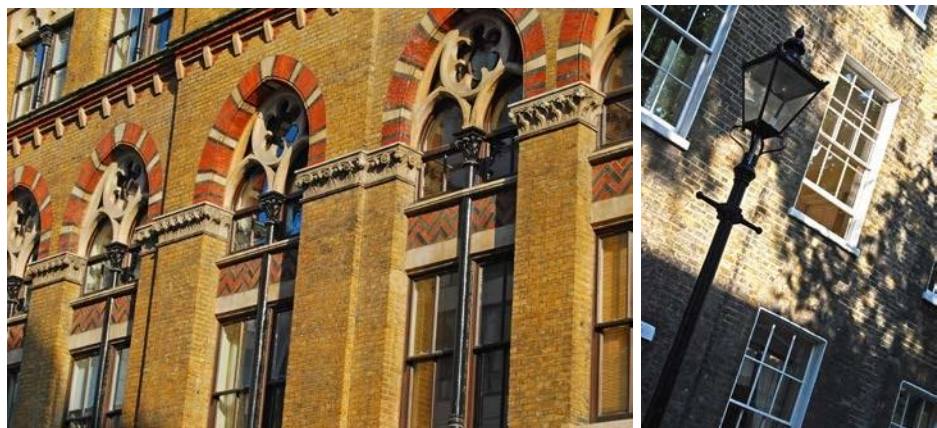
## 3 Heritage

### KEY MESSAGES

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

- We will only permit development within conservation areas that preserves and enhances the character and appearance of the area
- Our conservation area statements, appraisals and management plans contain more information on all the conservation areas
- Most works to alter a listed building are likely to require listed building consent
- The significance of 'Non-Designated Heritage Assets' (NDHAs) will be taken into account in decision-making
- Historic buildings can and should address sustainability and accessibility

- 3.1 This section provides guidance on our identified heritage assets (which include conservation areas, listed buildings and registered parks and gardens), including what they are and the implications of their status and designation. This section also sets out details on how historic buildings can address sustainability.
- 3.2 This section sets out further guidance on how we will apply Core Strategy Policy CS14 Promoting high quality places and conserving our heritage and Development Policy DP25 Conserving Camden's Heritage. **When does this apply?**
- 3.3 This guidance applies to all applications which may affect any element of the historic environment and therefore may require planning permission, or conservation area or listed building consent.



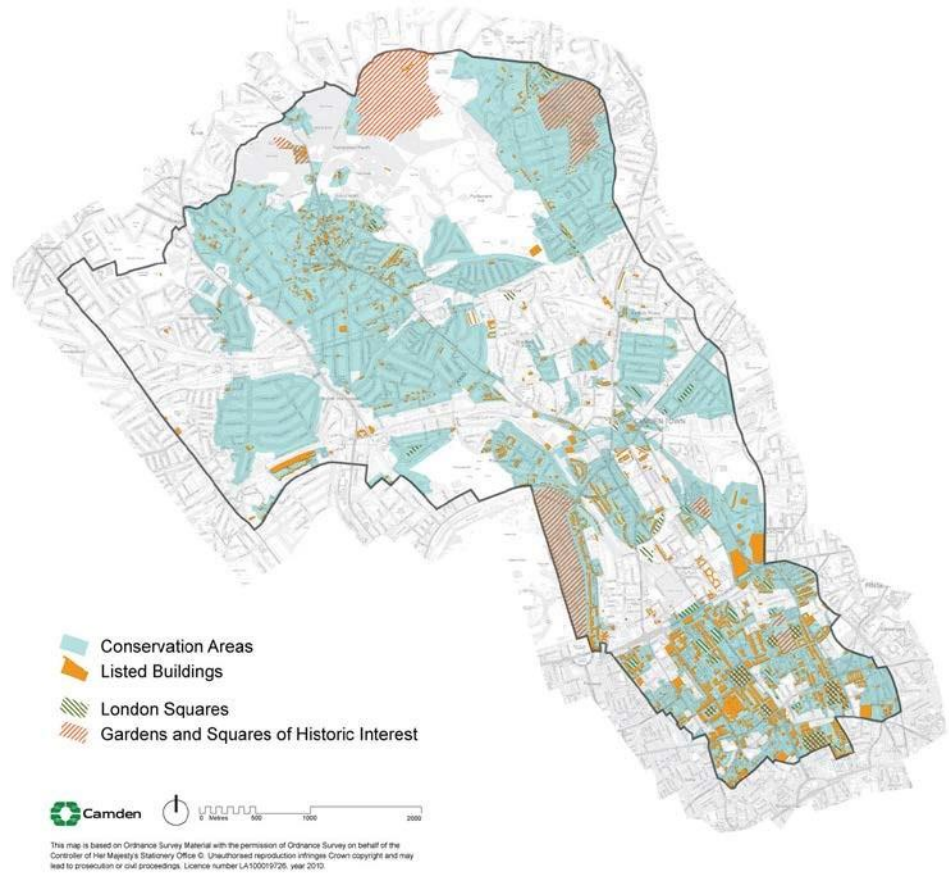
### Conservation Areas

#### What is a conservation area?

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

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

Figure 1. Conservation Areas



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

#### Effects of conservation area status

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

alterations, dormer windows, renewable energy installations or installation of a satellite dish.

#### **Renewable energy technology**

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

### **Demolition in conservation areas**

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

### **Trees**

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



### **Article 4 directions**

- 3.11 A range of minor changes can be made to buildings without the need to apply for planning permission as these have a general permission through planning legislation. These changes are known as permitted development. However, the character of a conservation area depends on the presence of specific original details and where these are lost the historic interest and attractive character of the area deteriorates.

- 3.12 In these situations we can issue an Article 4 direction through Article 4 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended). This removes permitted development rights and means a planning application has to be made for minor works that usually do not need one.
- 3.13 Further information on Article 4 directions, including where they apply in Camden is available on the 'Advice and help with planning applications' section of the Council's website [www.camden.gov.uk](http://www.camden.gov.uk) and English Heritage has published Guidance on making Article 4 Directions, available at [www.english-heritage.org.uk/publications/guidance-onmaking-article-4-directions/](http://www.english-heritage.org.uk/publications/guidance-onmaking-article-4-directions/)

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

- 3.14 We have published a series of conservation area statements, appraisals and management plans that set out our approach to preserving and enhancing the historic significance of each individual conservation area. Many of these conservation area statements are available for download on our website.
- 3.15 Conservation area statements, appraisals and management plans help guide the design of development in conservation areas and we take these into account when assessing planning applications.
- 3.16 Each conservation area statement, appraisal or management plan contains the following:
- A summary of the location and the historical development of an area;
  - A description of its character;
  - An outline of the key issues and development pressures that are currently of concern;
  - The key policy framework for that particular conservation area, and specific guidance for it;
  - An identification of heritage assets and elements of the wider historic environment which give an area its historic significance; and
  - An identification of sites and features that have a negative impact on the conservation area, or where an opportunity exists for enhancement of the area by redevelopment of a building or site.



## Listed Buildings

### What is a listed building?

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

#### **Listing description**

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

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

### How can I alter a listed building?

- 3.20 Most works to alter a listed building are likely to require listed building consent and this is assessed on a case by case basis, taking into

account the individual features of a building, its historic significance and the cumulative impact of small alterations. The listing description is not intended to be exhaustive and the absence of any particular feature in the description does not imply that it is not of significance, or that it can be removed or altered without consent. Listed status also extends to any object or structure fixed to the listed building, and any object or structure within its curtilage which forms part of the land. You should contact the Council at the earliest opportunity to discuss proposals and to establish whether listed building consent is required.

- 3.21 Some 'like for like' repairs and maintenance do not require listed building consent. However, where these would involve the removal of historic materials or architectural features, or would have an impact on the special architectural or historic interest of the building, consent will be required. If in doubt applicants should contact the Council for advice.
- 3.22 In assessing applications for listed building consent we have a statutory requirement to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. We will consider the impact of proposals on the historic significance of the building, including its features, such as:
- original and historic materials and architectural features;
  - original layout of rooms;
  - structural integrity; and • character and appearance.
- 3.23 We will expect original or historic features to be retained and repairs to be in matching material. Proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them.
- 3.24 Applications for listed building consent should be fully justified and should demonstrate how proposals would affect the significance of a listed building and why the works or changes are desirable or necessary. In addition to listed building consent, some proposals may also require planning permission. These applications should be submitted together and will be assessed concurrently.
- 3.25 It is a criminal offence to undertake unauthorised works to a listed building, even if you are not aware the building is listed, and could result in prosecution and fine or imprisonment (or both).
- 3.26 Some works that are required in order to comply with the Building Regulations (e.g. inclusive access, energy efficiency) may have an impact on the historic significance of a listed building and will require listed building consent.

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

- 3.27 It is important that everyone should have dignified and easy access to and within historic buildings, regardless of their level of mobility. With sensitive design, listed buildings can be made more accessible, while still preserving and enhancing the character of the building.



- 3.28 Further guidance is available in CPG4 Protecting and improving quality of life (Access for all chapter) and in the English Heritage publication “Easy Access to Historic Buildings” [www.english-heritage.org.uk](http://www.english-heritage.org.uk)



### **Non-Designated Heritage Assets (NDHAs)**

- 3.29 Camden has a high quality historic environment which includes listed buildings, conservation areas, parks and gardens recognised for their important architectural or historic interest and many formal squares protected under the London Squares Preservation Act 1931. The Borough also has many attractive, historic, locally significant buildings and features which contribute to the distinctiveness of local areas, but which are not formally designated. The National Planning Policy Framework (NPPF) identifies these features as non-designated heritage assets (NDHAs).
- 3.30 Buildings make up the majority of these NDHAs, but street furniture such as civil parish boundary markers, post boxes or cobbles, and historic natural landscape features such as green spaces, gardens and parks can also be considered NDHAs. Often it is the commonplace things around us that give character to an area, but they may be overlooked because of their familiarity. Pubs, shops, places of meeting, places of worship, benches, statues, whether subtle or idiosyncratic, all contribute to the particular character of a place. They add depth of meaning and make a place special for local people, by acting as a visual marker for the local history, traditions, stories and memories that survive into the present day.

### **Identification of NDHAs**

- 3.31 Non-designated heritage assets may either be identified as part of the planning process (e.g. pre-application process) or on Camden’s Local List.

### Camden's Local List

- 3.32 Camden's Local List identifies non-designated heritage assets within the borough, providing information about their architectural, historic, townscape and / or social significance. It acts as a valuable resource to residents, developers and other interested parties alike, helping to ensure that the significance of any asset deemed a non-designated heritage asset is carefully considered by the Council in decision making.
- 3.33 In order to ensure that the identification of non-designated heritage assets is consistent and that their significance is properly considered, the selection criteria, set out below, were developed and adopted in November 2012.

To be considered for inclusion on the Local List nominations should satisfy a minimum of two criteria with at least one of them being either criteria 1 or 2.

**CRITERIA 1 - ARCHITECTURAL SIGNIFICANCE** this includes assets that;

- a) demonstrate distinctive artistic, craftsmanship, design or landscaping qualities of merit (e.g. form, layout, proportions, materials, decoration);

and/or

- b) are attributed to a locally known, architect, designer, gardener or craftsman and demonstrates quality of design, execution, and innovation.

and/or

- c) exemplify a rare type or function which survives in anything like its original condition and form.

**CRITERIA 2 - HISTORICAL SIGNIFICANCE** this includes assets that

- a) demonstrate rare evidence of a particular phase or period of the area's history;

and/or

- b) are associated with a locally important historic person, family or group;

and/or

- c) are associated with a notable local historic event or movement. Nominations under this criteria should retain physical attributes which are of key importance to their historical significance.

**CRITERIA 3 - TOWNSCAPE SIGNIFICANCE**

key part in supporting the distinctive character of the neighbourhood either as a landmark, or as a character of the local area promoting collective identity or group identity.

#### CRITERIA 4 - SOCIAL SIGNIFICANCE

a) of spiritual significance; includes assets that have cultural, communal, commemorative, symbolic and/or historical significance;

b) are associated with locally distinctive literature, music or film; which have support from and are valued by the community and wider society. Nominations under this criterion should be for assets which are of key importance to their setting.

3.34 The Local List can be accessed online via the Local List webpage [www.camden.gov.uk/locallist](http://www.camden.gov.uk/locallist)

3.35 The Local List is an evolving document that will develop over time, e.g. as new non-designated heritage assets are identified, or new information requires an existing item on the Local List to be amended. A revised Local List will be published online annually to take account of any necessary amendments, and may also be periodically reviewed and updated.

#### Implications of being a non-designated heritage asset (NDHA)

3.36 Unlike proposals that will affect designated assets (such as statutorily Listed Buildings) being identified as a non-designated heritage asset (either identified on the Local List or as part of the planning process) does not automatically affect your permitted development rights.

However if planning permission is required for any proposal that would either directly or indirectly affect the significance of a non-designated heritage asset (either on the Local List or not) then the Council will treat the significance of that asset as a material consideration when determining the application.

**OFFICERS** - will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset/s affected. They will take account of:

- the desirability of sustaining and enhancing the significance of any non-designated heritage asset/s and putting them to viable uses consistent with their conservation;
- the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality;
- the desirability of new development that affects non-designated heritage assets to preserve and enhance local character and distinctiveness.

**APPLICANTS** - will need to show how the significance of the asset, including any contribution made by their setting, has been taken into consideration in the design of the proposed works. The level of detail required will be proportionate to the

asset/s importance and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset/s affected;

**PLEASE NOTE: There is a presumption in favour of retaining NDHAs which are either identified as part of planning process or on the Local List.**

- 3.37 The use of Article 4 Direction/s to remove specific permitted development rights from buildings/features identified as non-designated heritage assets will be considered where it is deemed necessary and appropriate.

### **Non-designated heritage assets and Conservation Areas**

- 3.38 The identification of NDHAs and the process of local heritage listing aims to focus attention on buildings/features which are considered to be locally significant but whose architectural and historic value is not formally recognised (and therefore do not currently benefit from protection as part of the planning process).
- 3.39 For this reason the focus of Camden's Local List is largely with buildings/features located outside designated conservation areas and does not include buildings that are identified as making a positive contribution to the character of a conservation area. However there may be exceptional circumstances where a building, landscape or feature is located within a conservation area but can still be considered for inclusion on the local list.
- 3.40 For information on conservation areas please refer to the section 3.43.16 in this chapter and our conservation area appraisals which are available on our website.



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

- 3.41 We recognise the role that the historic environment can play in reducing the impact of climate change. For example, reusing existing buildings could avoid the material and energy cost of new development. There are many ways to improve the efficiency and environmental impact of historic buildings, for example improving insulation, draught-proofing and integrating new energy-saving and renewable-energy technologies. We will seek to balance achieving higher

environmental standards with protecting Camden's unique built environment (in accordance with LDF Core Strategy policies CS13 Tackling climate change through promoting higher environmental standards and CS14 Promoting high quality places and conserving our heritage) and PPS5 policy HE.1.

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

### Planning obligations relating to heritage assets

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

### Further information

National Planning Policy Framework (NPPF)	<p>The Government's national policies on the historic environment are set out in:</p> <ul style="list-style-type: none"> <li>National Planning Policy Framework (NPPF) Chapter 12, Conserving and enhancing the historic environment – DCLG, 2012 <a href="https://www.gov.uk/government/publications/nationalplanning-policy-framework--2">https://www.gov.uk/government/publications/nationalplanning-policy-framework--2</a></li> </ul> <p>If you want guidance implement this national policy, it is provided in:</p> <ul style="list-style-type: none"> <li>Planning Practice Guidance, guidance category - Conserving and enhancing the historic environment <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/">http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/</a></li> <li>PPS 5 Practice Guidance for the Historic Environment is still extant whilst the government prepares further guidance in the form of Technical Advice Notes, due out for consultation summer 2014. <a href="http://www.english-heritage.org.uk/professional/advice/governmentplanning-policy/pps-practice-guide/">http://www.english-heritage.org.uk/professional/advice/governmentplanning-policy/pps-practice-guide/</a></li> </ul>
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English Heritage	<p><a href="http://www.englishheritage.org.uk">www.englishheritage.org.uk</a> Guidance on heritage assets:</p> <ul style="list-style-type: none"> <li>• Guidance on Conservation Area Appraisals, 2006 – English Heritage;</li> <li>• Guidance on Management of Conservation Areas, 2006 – English Heritage;</li> <li>• Climate Change and the Historic Environment (2008); and</li> <li>• Heritage at Risk Register - English Heritage <a href="http://risk.english-heritage.org.uk/2010.aspx">http://risk.english-heritage.org.uk/2010.aspx</a></li> <li>• Good Practice Guide to Local Heritage Listing (2012) <a href="http://www.english-heritage.org.uk/caring/listing/local/local-designations/local-list/">http://www.english-heritage.org.uk/caring/listing/local/local-designations/local-list/</a></li> </ul> <p>Guidance on sustainability measures in heritage buildings:</p> <ul style="list-style-type: none"> <li>• Energy Conservation in Traditional Buildings</li> <li>• Climate Change and the Historic Environment</li> </ul> <p>There is also an online resource dedicated to climate change and the historic environment, available at:</p> <ul style="list-style-type: none"> <li>• <a href="http://www.englishheritage.org.uk/climatechangeandyourhome">www.englishheritage.org.uk/climatechangeandyourhome</a></li> </ul>
Energy Saving Trust	<p><a href="http://www.est.org.uk">www.est.org.uk</a></p>

## 4 Extensions, alterations and conservatories

### KEY MESSAGES

- Alterations should always take into account the character and design of the property and its surroundings.
- Windows, doors and materials should complement the existing building.
- Rear extensions should be secondary to the building being extended.
- You can make certain types of minor alterations without planning permission (see below) external alterations.

- 4.1 This guidance provides advice to those seeking to alter or extend a residential property, including the erection of conservatories. The principles of this guidance also apply to extensions and alterations to other types of property. It expects high quality design that respects and enhances the character and appearance of a property and its surroundings, and also covers matters such as outlook, privacy and overlooking.
- 4.2 This guidance relates to Core Strategy Policy CS14 Promoting high quality places and conserving our heritage and Development Policies DP24 Securing high quality design. **When does this apply?**
- 4.3 This guidance applies to all proposals for alterations and extensions to residential properties, although some aspects will be relevant to alterations and extensions to other types of buildings.
- 4.4 You can make certain types of minor changes to your property without needing to apply for planning permission. These are called "permitted development rights", and further details can be found on the planning portal website [www.planningportal.gov.uk](http://www.planningportal.gov.uk) or by contacting the Council. In some conservation areas, Article 4 directions have been introduced which have removed certain permitted development rights. Details of Article 4 Directions, including where they apply in Camden can be found in the Conservation and Urban Design section of our website [www.camden.gov.uk](http://www.camden.gov.uk).
- 4.5 In addition to this guidance, you should also make reference to chapters on Heritage, Design excellence and Roofs, Terraces and balconies, in this CPG. If your property is situated within a conservation area then you should also refer to the relevant Conservation Area Statement, Appraisal or Management Plan, which sets out detailed guidelines for development in a particular area. Many of these are available on our website.

## Guidance for all extensions and alterations

### External alterations

- 4.6 The good practice principles set out below and the general design considerations for residential façades shown in Figure 1 – ‘Alterations to Residential Façades’ should be followed when undertaking external alterations. A façade is the front or face of a building.

### Good practice principles for external alterations

- 4.7 Alterations should always take into account the character and design of the property and its surroundings. A harmonious contrast with the existing property and surroundings may be appropriate for some new work to distinguish it from the existing building; in other cases closely matching materials and design details are more appropriate so as to ensure the new work blends with the old.

### Windows

- Where it is necessary to alter or replace windows that are original or in the style of the originals, they should be replaced like with like wherever possible in order to preserve the character of the property and the surrounding area. New windows should match the originals as closely as possible in terms of type, glazing patterns and proportions (including the shape, size and placement of glazing bars), opening method, materials and finishes, detailing and the overall size of the window opening.
- Where timber is the traditional window material, replacements should also be in timber frames. uPVC windows are not acceptable both aesthetically and for environmental reasons, including their relatively short lifespan and inability to biodegrade. Similarly, where steel is the traditional window material, steel replacements will be sought wherever possible, see also CPG3 Sustainability (Sustainable use of materials chapter), which gives guidance on the use of sustainable materials).
- Reference should be made to the Building Research Establishment’s (BRE) Green Guide to Specification when sourcing replacement window frames.
- Where the original glazing bars are highly detailed and intricate, or contain stained glass or leaded panes these should be retained and repaired. See also the Camden leaflet *A Guide to Windows (2006)*, which is available on our website, for advice on secondary glazing and other ways to improve energy efficiency while retaining attractive original features.
- Where windows are replaced they should have the lowest ‘U-value’ feasible.
- Listed building consent will be required for replacement windows, secondary glazing and double-glazing in listed buildings.



- In conservation areas original single-glazed windows often contribute to the character and appearance of the area, and should be retained and upgraded. There may however be some instances where doubleglazing can be installed in a design that matches the original, for instance sash windows or casements with large individual pane sizes, or in secondary glazing. In such cases, the window frame and glazing bars of the replacement windows should match the existing.
- Further guidance on window alterations and the effect that this can have on energy efficiency and protecting heritage assets can be found on English Heritage's 'Climate Change and your Home' website: [www.climatechangeandyourhome.org.uk](http://www.climatechangeandyourhome.org.uk)

### Doors

- Where you are looking to replace doors their design should match the dimensions, proportions, joinery details, panelling and glazing of the original. Where timber replacement doors are proposed the timber should be sustainably sourced.
- Characteristic doorway features, such as porches, such be retained where they make a positive contribution to the character of groups of buildings.

### Materials

- Wherever possible you should use materials that complement the colour and texture of the materials in the existing building, see also CPG3 Sustainability (Sustainable use of materials chapter). In historic areas traditional materials such as brick, stone, timber and render will usually be the most appropriate complement to the existing historic fabric; modern materials such as steel and glass may be appropriate but should be used sensitively and not dominate the existing property.
- Materials for alterations should weather well, so their ageing process contributes positively to the character of the building, and the site's wider context.
- Original surface finishes should be retained or replicated wherever possible, as they are usually central to the architectural design / character treatment of a building. These may cover the entire building or façade (such as stucco facing), the roof elements (such as roof tiles and roof ridges), highlight specific features (such as windows or doors) or act as decorative elements (such as ironwork or terracotta panels).
- When repairing existing wall finishes, the composition of the original material (such as plaster, stucco or render) should be determined, the defective area cut out and a replacement material of identical chemical composition applied and properly bonded. Concrete repairs are generally non-original and unsympathetic to historic buildings, and can damage bricks, and should be replaced with a more traditional lime-based finish.
- The insulating quality of materials should be considered, along with their embodied energy (the energy used in manufacture) and the potential for re-use and recycling.

- Alterations or repairs to brickwork or stonework should match the original in all respects while satisfying the needs of durability and maintenance. This should include matching the original bond, mortar colour and texture. Retention of any existing pointing is encouraged wherever possible.
- Samples of brick type and mortar colour will normally be required to be submitted to the Council as part of any application.
- Painting, rendering or cladding of brickwork will normally be resisted, as it is often unsightly and can damage the appearance of a building by obscuring the texture and original colour of the façade. Painting, rendering or cladding may also trap moisture, which can cause major damp problems in the masonry.

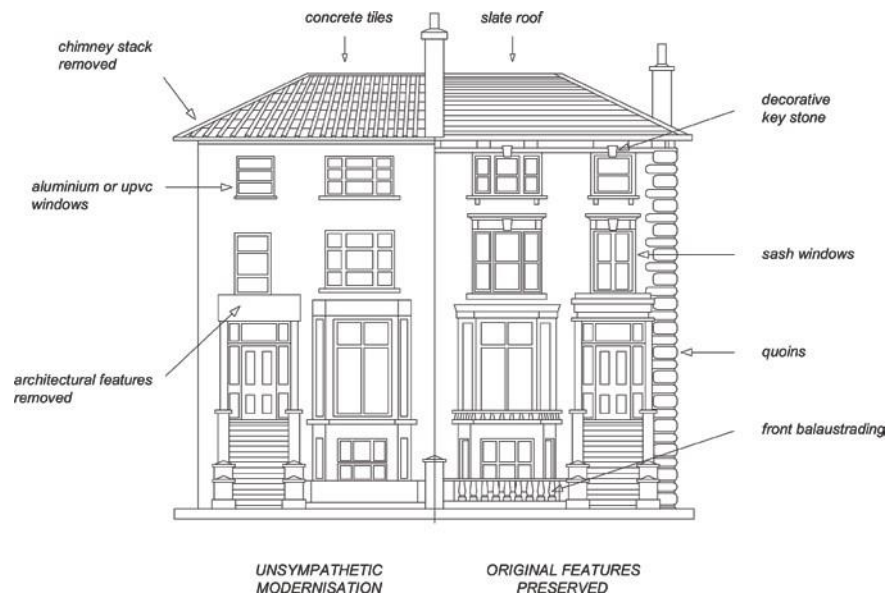
### External pipework

- Original external pipework and guttering should be repaired or reinstated in a like-for-like manner, where possible. In the case of historic buildings, cast iron replicas of original pipework are preferable to uPVC pipes. New pipework should be restricted to the side and rear elevations of buildings to avoid spoiling the appearance of the principal façade and should be grouped together and located in a discrete position.

### Scale

- 4.8 Extensions should be subordinate to the original building in terms of scale and situation unless the specific circumstances of the site, such as the context of the property or its particular design, would enable an exception to this approach. More detailed guidance on design considerations is contained within CPG1 Design (Design excellence chapter).

**Figure 2. Alterations to residential facades**



### **Rear extensions**

- 4.9 A rear extension is often the most appropriate way to extend a house or property. However, rear extensions that are insensitively or inappropriately designed can spoil the appearance of a property or group of properties and harm the amenity of neighbouring properties, for example in terms of outlook and access to daylight and sunlight.

### **General principles**

- 4.10 Rear extensions should be designed to:
- be secondary to the building being extended, in terms of location, form, scale, proportions, dimensions and detailing;
  - respect and preserve the original design and proportions of the building, including its architectural period and style;
  - respect and preserve existing architectural features, such as projecting bays, decorative balconies or chimney stacks;
  - respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space;
  - not cause a loss of amenity to adjacent properties with regard to sunlight, daylight, outlook, overshadowing, light pollution/spillage, privacy/overlooking, and sense of enclosure;
  - allow for the retention of a reasonable sized garden; and
  - retain the open character of existing natural landscaping and garden amenity, including that of neighbouring properties, proportionate to that of the surrounding area.
- 4.11 Materials should be chosen that are sympathetic to the existing building wherever possible (see also CPG3 Sustainability on Sustainable use of materials).

### **Height of rear extensions**

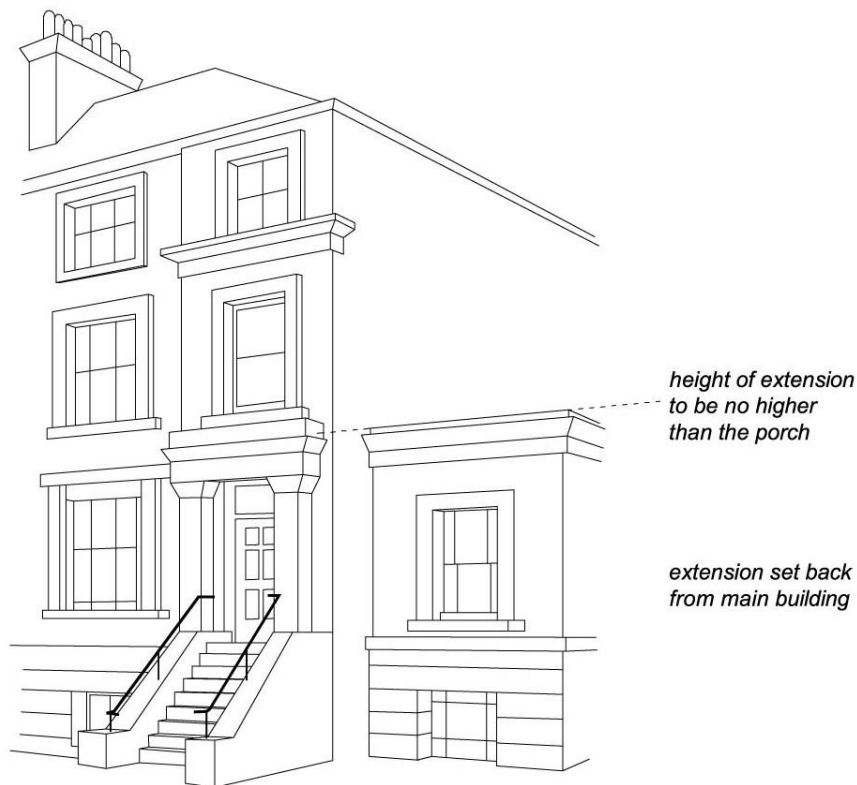
- 4.12 In order for new extensions to be subordinate to the original building, their heights should respect the existing pattern of rear extensions, where they exist. Ground floor extensions are generally considered preferable to those at higher levels. The maximum acceptable height of an extension should be determined in relation to the points outlined in paragraph 4.10 above. In cases where a higher extension is appropriate, a smaller footprint will generally be preferable to compensate for any increase in visual mass and bulk, overshadowing and overlooking that would be caused by the additional height.
- 4.13 In most cases, extensions that are higher than one full storey below roof eaves/parapet level, or that rise above the general height of neighbouring projections and nearby extensions, will be strongly discouraged.

### **Width of rear extensions**

- 4.14 The width of rear extensions should be designed so that they are not visible from the street and should respect the rhythm of existing rear extensions.
- 4.15 In addition, the rear of some buildings may be architecturally distinguished, either forming a harmonious composition, or visually contributing to the townscape. The Council will seek to preserve these where appropriate. Some of the Borough's important rear elevations are identified in conservation area statements, appraisals and management plans.

### **Side extensions**

- 4.16 Certain building forms may lend themselves to side extensions. Such extensions should be designed in accordance with the general considerations set out above in paragraph 4.10. Side extensions should also:
- be no taller than the porch; and
  - set back from the main building.
- 4.17 In many streets in the north of the Borough houses have mature rear gardens that can often be seen through gaps between buildings, softening the urban scene and providing visual interest. The infilling of gaps will not be considered acceptable where:
- significant views or gaps are compromised or blocked;
  - the established front building line is compromised;
  - the architectural symmetry or integrity of a composition is impaired;
  - the original architectural features on a side wall are obscured; or
  - access to the rear of a property is lost.
- 4.18 Where a property is located in a conservation area, reference should be made to the relevant conservation area statements, appraisals and management plans, which often identify important gaps and vistas where infilling would be inappropriate.

**Figure 3. Side extensions**

## Conservatories

4.19 Conservatories should normally:

- be located adjacent to the side and rear elevations of the building;
- be subordinate to the building being extended in terms of height, mass, bulk, plan form and detailing;
- respect and preserve existing architectural features, e.g. brick arches, windows etc;
- be located at ground or basement level. Only in exceptional circumstances will conservatories be allowed on upper levels;
- not extend the full width of a building. If a conservatory fills a gap beside a solid extension, it must be set back from the building line of the solid extension; and
- be of a high quality in both materials and design.

4.20 Conservatories should not overlook or cause light pollution to neighbouring properties, including to those in flats above. In order to minimise overlooking, opaque lightweight materials such as obscured glass may be necessary on façades abutting neighbouring properties. Also, in order to minimise light pollution, solid lightweight materials, oneway glass or obscured glass may be required.

- 4.21 Further guidance is contained within CPG4 Protecting and improving quality of life (Light Pollution chapter).

#### **Development in rear gardens and other open land**

- 4.22 The construction of garden buildings, including sheds, stand-alone green houses and other structures in rear gardens and other undeveloped areas, can often have a significant impact upon the amenity, biodiversity and character of an area. They may detract from the generally soft and green nature of gardens and other open space, contributing to the loss of amenity for existing and future residents of the property.
- 4.23 Large garden buildings may also affect the amenity value of neighbours' gardens, and if used for purposes other than storage or gardening, may intensify the use of garden spaces.
- 4.24 Development in rear gardens should:
- ensure the siting, location, scale and design of the proposed development has a minimal visual impact on, and is visually subordinate to, the host garden
  - not detract from the open character and garden amenity of the neighbouring gardens and the wider surrounding area
  - use suitable soft landscaping to reduce the impact of the proposed development
  - ensure building heights will retain visibility over garden walls and fences
  - use materials which complement the host property and the overall character of the surrounding area. The construction method should minimise any impact on trees (also see Landscape design and trees chapter in this CPG), or adjacent structures
  - address any impacts of extensions and alterations upon water run-off and groundwater flows, both independently or cumulatively with other extensions, and demonstrate that the impact of the new development on water run-off and groundwater flows will be negated by the measures proposed. Reference should be made to CPG3 Sustainability (Flooding chapter).
- 4.25 Pockets of privately owned land make important contributions to the character of certain parts of the borough, both in established neighbourhoods and areas of new development, creating village greens, informal verges, set backs for established structures or settings for listed buildings. Building on such areas will generally be discouraged.
- 4.26 Where any type of development, either in a rear garden or on private land that forms part of a public space, may be appropriate in principle, a full assessment should be made prior to the commencement of the development to avoid any potential impact upon trees or other vegetation in the surrounding area. This assessment may be required as part of an application for planning permission.

### **Further information**

- 4.27 The following professional bodies provide further guidance and advice on buildings and design matters:
- Royal Institute of Chartered Surveyors (RICS); and
  - Royal Institute of British Architects (RIBA).

## 5 Roofs, terraces and balconies

### KEY MESSAGES

Roof extensions fall into two categories:

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

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

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

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

### When does this apply?

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

### Roof alterations and extensions – general principles

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



- There are a variety of additions or alterations to roofs which create an established pattern and where further development of a similar form would not cause additional harm.

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

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

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

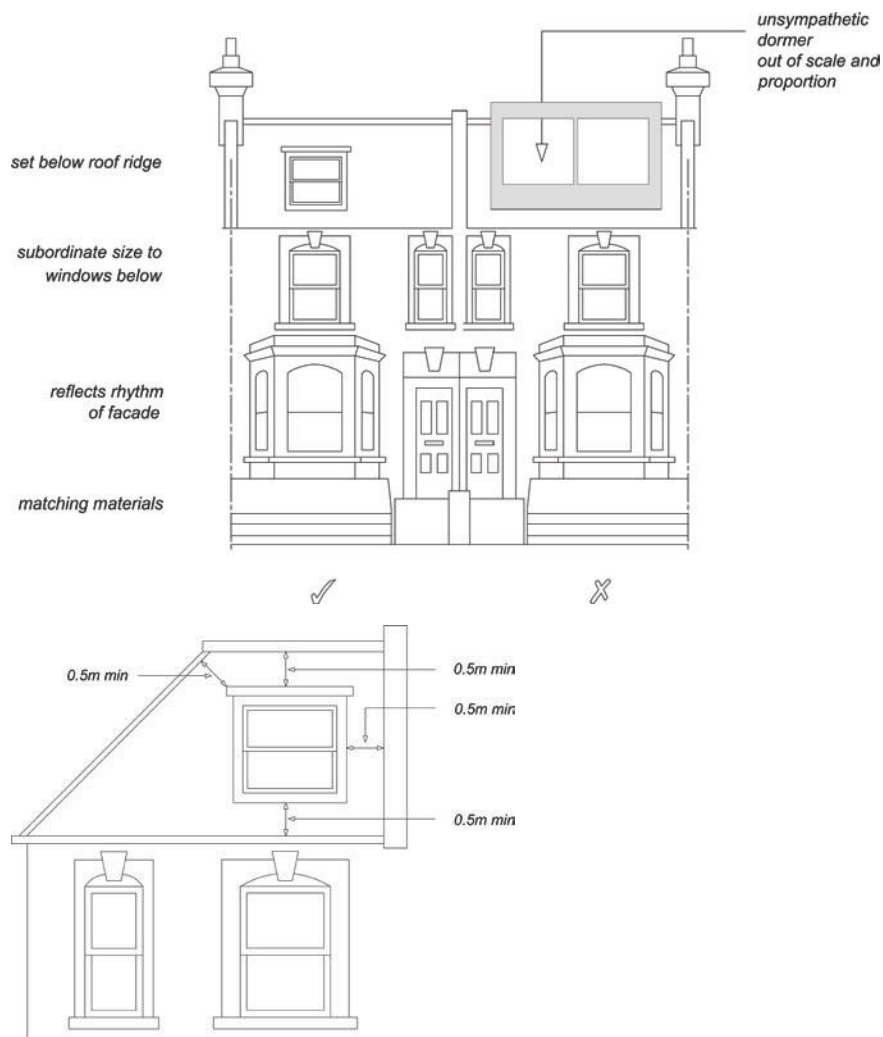
5.10 Where the principle of an additional storey is acceptable, the more specific guidance set out below will apply. This advice is supplemented by more specific area-based advice as set out in the Council's conservation area statements, appraisals and management plans which set out our approach to preserving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

### **Roof dormers**

5.11 Alterations to, or the addition of, roof dormers should be sensitive changes which maintain the overall structure of the existing roof form. Proposals that achieve this will be generally considered acceptable, providing that the following circumstances are met:

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

Figure 4. Dormer windows

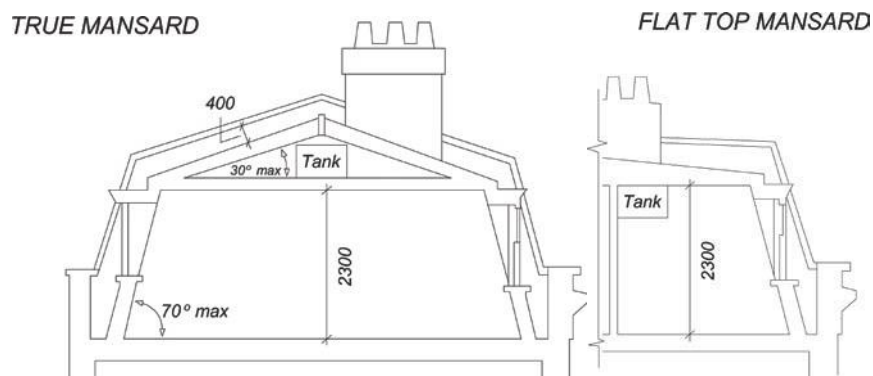


- 5.12 See CPG2 Housing (Residential development standards chapter) for further information, particularly the section on ceiling heights.
- 5.13 The presence of unsuitably designed new or altered dormers on neighbouring properties will not serve as a precedent for further development of the same kind.

### Mansard Roofs

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

Figure 5. Mansard Roofs

**True Mansard****Flat topped Mansard**

Lower slope is at a steeper angle than Upper slope of a pitch below the upper, and the upper slope is visible 5° or totally flat

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

**Parapet wall**

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

**Cornice**

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

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

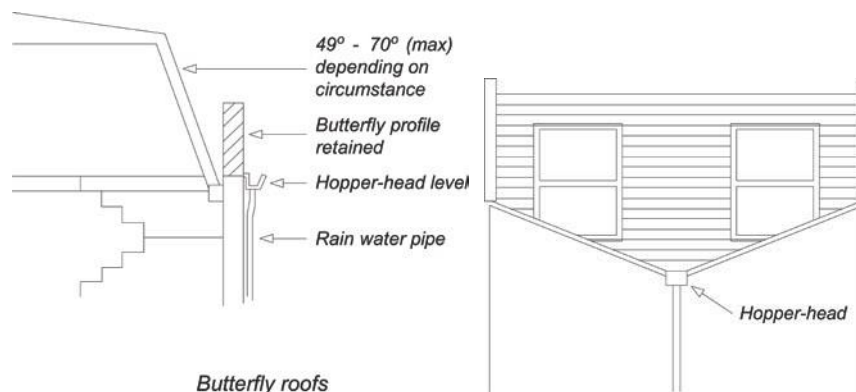
as is possible. (See also guidance on dormer windows and roof lights). Dormer windows or roof lights should be confined to the lower slope.

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

### Valley or Butterfly roofs

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

Figure 6. Butterfly roofs



#### Hopper head level

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

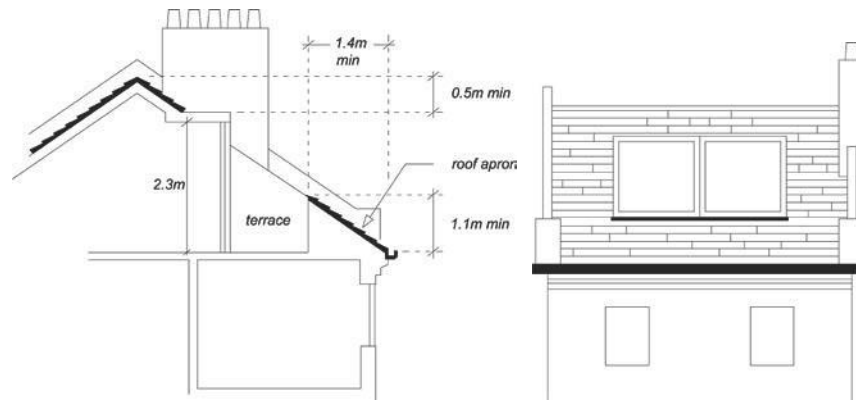
### Other roof additions

- 5.20 On some contemporary buildings a less traditional form of roof addition may be more appropriate. In such cases, proposals should still have regard for the following general principles:
- The visual prominence, scale and bulk of the extension;
  - Use of high quality materials and details;
  - Impact on adjoining properties both in terms of bulk and design and amenity of neighbours, e.g. loss of light due to additional height;
  - Sympathetic design and relationship to the main building. **Roof lights**

- 5.21 Roof lights can have an adverse impact upon the character and appearance of buildings and streetscapes. This occurs where they are raised above the roof slope rather than being flush with the roof profile, or where they are an incompatible introduction into an otherwise uncluttered roofscape, or where they conflict with other architectural roof elements, e.g. gables and turrets.
- 5.22 Roof lights should be proportioned to be significantly subordinate both in size and number and should be fitted flush with the roof surface. Some properties, particularly listed buildings and those within conservation areas with prominent roof slopes may be so sensitive to changes that even the installation of roof lights may not be acceptable. **Balconies and terraces**
- 5.23 Balconies and terraces can provide valuable amenity space for flats that would otherwise have little or no private exterior space. However, they can also cause nuisance to neighbours. Potential problems include overlooking and privacy, daylight, noise, light spillage and security.
- 5.24 Balconies and terraces should form an integral element in the design of elevations. The key to whether a design is acceptable is the degree to which the balcony or terrace complements the elevation upon which it is to be located. Consideration should therefore be given to the following:
- detailed design to reduce the impact on the existing elevation;
  - careful choice of materials and colour to match the existing elevation;
  - possible use of setbacks to minimise overlooking – a balcony need not necessarily cover the entire available roof space;
  - possible use of screens or planting to prevent overlooking of habitable rooms or nearby gardens, without reducing daylight and sunlight or outlook; and
  - need to avoid creating climbing opportunities for burglars. **Roof Level**
- 5.25 A terrace provided at roof level should be set back behind the slope of a pitched roof in accordance with Figure 7, or behind a parapet on a flat roof. A terrace should normally comply with the following criteria:
- The dimensions of the roof should be sufficient to accommodate a terrace without adversely affecting the appearance of the roof or the elevation of the property.
  - A terrace will only normally be acceptable on the rear of properties. It is normally inappropriate to set back a mansard to provide a terrace.
  - It should not result in the parapet height being altered, or, in the case of valley/butterfly roofs, the infilling of the rear valley parapet by brickwork or railings.
  - Any handrails required should be well set back behind the line of the roof slope, and be invisible from the ground.
  - It should not result in overlooking of habitable rooms of adjacent properties.
- 5.26 When a terrace is provided within the slope of a pitch as in Figure 7, the adjacent tiles or slates should be kept unbroken above the eaves. The width of the terrace should be no wider than a dormer opening. A terrace may be

acceptable behind an existing parapet. Where the height of the parapet is less than 1.1m, a railing will be required to fulfil Building Regulations.

Figure 7. Roof terraces



### Building services equipment

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

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

### Solar panels

5.29 We encourage the installation of solar panels into schemes and for some properties these will not need planning permission. You should contact the Council and visit the Planning Portal website [www.planningportal.gov.uk](http://www.planningportal.gov.uk) to confirm whether planning permission is required for solar panels. Solar panels should be sited so as to maximise efficiency but minimise their visual impact and glare, for example utilising valley roofs and concealed roof slopes. Reference should be made to CPG3 Sustainability (Energy Efficiency: existing buildings and Energy Efficiency: new buildings chapters).

## 6 Landscape design and trees

### KEY MESSAGES

- Camden's trees and green spaces are integral to its character.
- Landscape design and green infrastructure should be fully integrated into the design of schemes from the outset.
- We require a survey of existing trees and vegetation to be carried out prior to the design of a scheme.

6.1 This guidance sets out how to protect trees and vegetation and design high quality landscapes in conjunction with development proposals to ensure an attractive, safe, accessible, sustainable and ecologically diverse environment.

6.2 This chapter sets out:

- how existing trees and landscape should be protected;
- what specific protection is given to some trees;
- how new landscaping should be incorporated into developments; and
- considerations for specific landscaped areas and types of landscaping.

6.3 The green landscape of the Borough is formed by parks and open spaces, railway and canal corridors, trees, gardens, green walls and roofs. These landscape components provide Camden's green infrastructure and play a key role in maintaining the local climate, reducing storm water run off, increasing biodiversity, providing space for urban food production and providing public enjoyment.

6.4 We expect landscape design and the provision of green infrastructure to be fully integrated into the design of development proposals from the beginning of the design process.

6.5 This section sets out further guidance on how we will apply Core Strategy Policy CS14 Promoting high quality places and conserving our heritage and Development Policy DP24 Securing high quality design. **Where does this guidance apply?**

6.6 This guidance applies to all proposals affecting or including landscape design on and around buildings and proposals relating to on and off site trees.

### How should existing Trees and Landscape be protected?

#### Benefits of retaining vegetation and trees

6.7 Vegetation of all types is at a premium in Camden given the Borough's dense urban environment. Camden's tree canopy and other existing vegetation are integral to its character. If you maintain existing trees and vegetation on a development site it will help provide a sense of maturity to a development and integrate a development into its setting. Existing trees and vegetation are a key component in adapting to climate change and conserving biodiversity. See



CPG3 Sustainability chapters on Climate change adaptation and Biodiversity. Existing species can serve as an indicator of what might be successfully grown on the site when selecting additional plants. The retention of existing mature trees and vegetation also make an important contribution to the sustainability of a project. For example by reducing the impacts and energy demand associated with the provision of new plants such as in their transportation and the irrigation required.

### **How should existing trees and vegetation be protected?**

- 6.8 We will require a survey of existing trees and vegetation to be carried out prior to the design of a scheme in order to identify what trees and vegetation should be retained and protected on site. We will expect developers to follow the principles and practices set out in BS 5837: 2005 Trees in relation to construction to integrate existing trees into new developments.



- 6.9 BS5837: 2005 Trees in relation to construction outlines the survey method for identifying which trees should be retained and protected. Once the survey has identified the important trees and vegetation a Tree Constraints Plan (TCP) needs to be prepared for the site. The TCP is essential to site planning as it provides the limitations for development including:
- site layout and building lines;
  - changes in levels;
  - foundation design; and
  - service provision where the root zones and crown spread of trees are to be protected.

### **NEW UTILITIES**

Useful guidance for the installation of new utilities in the vicinity of trees is also provided in National Joint Utilities Group (NJUG) Vol 4 - Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees

- 6.10 The TCP should also identify the provision of sufficient space, above and below ground for new planting to develop and mature and existing trees to continue to grow (see paragraph 6.42 below regarding soft landscape design).
- 6.11 Where trees are identified to be retained it is imperative that contracting and site supervision procedures are in place to ensure that there is no damage during and after construction. We will normally seek a Method Statement which sets out how trees that are to be retained, both on and adjacent to the site will be protected. The Method Statement should identify how the provision of site accommodation, storage areas, site access and the positioning, heights and arcs of cranes will not affect the trees and vegetation that are to be protected.

**Root zone**

The area and volume of soil around the tree in which roots are found. May extend to three or more times the branch spread of the tree, or several times the height of the tree.

**Crown spread**

The extent of the branches, twigs and leaves that form the top of the tree

**Specific protection for trees**

- 6.12 Where a planning application involves works that affect trees either within the application site or on adjacent land (including street trees) we will require the following information to determine the application:
1. A Tree Survey  
(see section 4.2 of BS5837:2005)
  2. A Tree Constraints Plan  
(see sections 5.2 and 5.3 of BS5837:2005)
  3. An Arboricultural Implications Assessment  
(see section 6 of BS5837:2005)
  4. An Arboricultural Method Statement for the protection of trees to be retained including a Tree Protection Plan  
(see section 7 of BS5837:2005)
- 6.13 Failure to supply the documents outlined above may lead to a planning application not being validated.
- 6.14 To obtain a copy of BS5837:2005 please visit [www.StandardsUK.com](http://www.StandardsUK.com) and for a list of arboricultural consultants visit [www.trees.org.uk](http://www.trees.org.uk), [www.charteredforesters.org](http://www.charteredforesters.org) and [www.consultingarboristsociety.co.uk](http://www.consultingarboristsociety.co.uk).

**Tree preservation orders**

- 6.15 Many trees in Camden are covered by a Tree Preservation Order (TPO). Please contact the Council to find out if a tree is protected by a TPO.

**TREE PRESERVATION ORDER**

A tree preservation order is made by the Council to legally protect specific trees or groups of trees that provide public amenity. Unauthorised works to a tree with a TPO is a criminal offence and may result in prosecution and, upon conviction, a fine.

- 6.16 Works (above or below ground) to trees with a TPO require our permission. Application forms for these works are available at [www.camden.gov.uk](http://www.camden.gov.uk).
- 6.17 Works to a tree with a TPO required to enable the implementation of a planning permission are dealt with as part of a planning application. A further TPO application is not required.

**Trees in Conservation Areas****SECTION 211**

Under Section 211 of the Town & Country Planning Act 1990, anyone proposing to cut down or carry out work on a tree in a Conservation Area must provide the Council 6 weeks notice of their intention to do so.

- 6.18 All trees in Conservation Areas with a trunk diameter of 75mm or greater measured at 1.5m above ground level are protected under section 211 of the Town and Country Planning Act 1990 (as amended). If you are proposing works to a tree in a Conservation Area, above or below ground, you are required to give Camden Planning Services six weeks notice of your proposals (See above link for forms). Works to a tree in a Conservation Area required to facilitate the implementation of a planning permission are dealt with as part of a planning application. A further section 211 Notification is not required. If you carry out unauthorised works to a tree in a Conservation Area is a criminal offence and may result in prosecution and, upon conviction, a fine.

**How should new landscaping be included into a development?****General principles**

- 6.19 Urban landscape design encompasses the following types of spaces:
- streets and associated public spaces,
  - parks, public and private squares, gardens,
  - amenity and servicing space around buildings; and
  - buildings themselves.
- 6.20 The principle components of landscape design are soft landscape details (planting) and hard landscape details (the constructed aspects of design) for example surfaces, lighting, seating, water features and boundary treatments.
- 6.21 Urban spaces have particular character which results from a combination of factors including geology, ecology, topography and the history of their development and use. We will expect new landscape design to respond to, preserve and enhance local character, including through the:

- preservation of existing trees and hedges;
- planting of new trees and hedges; and
- detailed design of boundary treatments and spaces within the site particularly where they are visible to the public domain.



#### 6.22 Planning applications will be assessed against

- the successful resolution of the above elements into the design of the site
- whether the site design has optimised opportunities to increase a site's sustainability and function in adapting to climate change (see CPG3 Sustainability for further details on Biodiversity and Climate change adaptation)
- the need to reduce opportunities for criminal behaviour (see the chapter in this guidance on Designing safer environments)
- the need to provide inclusive environments (see CPG6)

#### **Specific areas that are landscaped and contain trees**

#### 6.23 Areas within a development site that are generally landscaped include:

- gardens;
- access and servicing routes;
- parking spaces and cycle stores;
- boundary walls, fences and railings; and
- building roofs and walls.

#### **Gardens**

#### 6.24 Front, side and rear gardens make an important contribution to the townscape of the Borough and contribute to the distinctive character and appearance of individual buildings and their surroundings. Gardens are particularly prone to development pressure in the Borough with their loss resulting in the erosion of local character and amenity, biodiversity and their function in reducing local storm water run off.

## Front Gardens

6.25 The design of front gardens and forecourt parking areas make a large impact on the character and attractiveness of an area and in particular the streetscene. The design of front gardens and other similar forecourt spaces should:

- consider a balance between hard and soft landscaping. Where changes take place no more than 50% of the frontage area should become hard landscape. Where parking areas form part of the forecourt enough of the front boundary enclosure should be retained to retain the spatial definition of the forecourt to the street and provide screening;
- retain trees and vegetation which contribute to the character of the site and surrounding area;
- retain or re-introduce original surface materials and boundary features, especially in Conservation Areas such as walls, railings and hedges where they have been removed. If new materials are to be introduced they should be complementary to the setting; and
- prevent the excavation of lightwells as a means of providing access to basements where this does not form part of the historical means of access to these areas.



## Paving of front gardens

### CHANGES TO PERMITTED DEVELOPMENT

The General Permitted Development Order no longer allows the creation of more than 5 square meters of impermeable surfaces at the front of dwelling houses that would allow uncontrolled runoff of rainwater from front gardens onto roads without first obtaining planning permission. Changes to frontages incorporating hard standings may also be affected by Article 4 Directions. Article 4 Directions are issued by the Council in circumstances where specific control over development is required, primarily where the character of an area of acknowledged importance would be threatened, such as conservation areas

6.26 Planning Permission will not be granted for hard standings greater than five square metres that do not incorporate sustainable urban drainage systems

(SUDS) into the design. SUDS incorporate permeable surfaces to allow water to soak into the subsoil, rather than being diverted into the stormwater system. SUDS are particularly appropriate in the parts of the borough north of Euston Road as this area has predominantly clay soils. Methods for choosing the appropriate design of a SUDS are provided in “Responsible rainwater management around the home” available from [www.paving.org.uk](http://www.paving.org.uk). Planning applications which incorporate car parking areas into developments will be required to demonstrate that the chosen solution is appropriate to the underlying soil type.

### Creating a cross over

- 6.27 For single family dwellings planning permission is not required for the creation of a cross over unless the property is affected by an Article 4 Direction or the cross over is to a classified road. However permission is required for the formation of a cross over from the Highways Authority. The Highways Authority will generally refuse permission where it would result in the loss of on street car parking spaces.
- 6.28 Planning permission is required for forecourt parking at the fronted of buildings divided into flats. Listed Building Consent is required to alterations to structures affecting listed buildings including structures within their curtilage.

#### Listed building consent

Legally required in order to carry out any works to a Listed Building which will affect its special value. This is necessary for any major works, but may also be necessary for minor alterations and even repairs and maintenance. Listed Building Consent may also be necessary for a change of use of the property.

### Rear Gardens

- 6.29 Rear gardens are important as they:
- form part of the semi public domain where they are over looked by large numbers of properties and the occupants of surrounding buildings benefit from the outlook.
- form the character of an area in terms of the relationship between buildings and spaces and the resulting openness or sense of enclosure
- provide a sense of the greenery where they can be viewed through gaps between buildings
  - provide a sense of visual separation and privacy
  - soften the impact of buildings and integrate them into their setting
  - play a significant role in maintaining the biodiversity of the borough (see CPG3 Sustainability for further details on Biodiversity). In particular groups of trees and vegetation along the rear boundaries of garden provide important wild life corridors within existing development patterns.
- 6.30 The potential detrimental affects of new structures in gardens can be reduced by:

- carefully siting structures away from vegetation and trees,
- designing foundation to minimise damage to the root protection zones of adjacent trees,
- including green roofs, green walls on new development and vegetation screens.

**Root protection zone**

The area around the base or roots of the tree that needs to be protected from development and compaction during construction to ensure the survival of the tree.

- 6.31 Planning permission is unlikely to be granted for development whether in the form of extensions, conservatories, garden studios, basements or new development which significantly erode the character of existing garden spaces and their function in providing wildlife habitat (See the chapters on Extensions, Alterations and Conservatories in this guidance document, and CPG4 on Basements).

**Access and servicing areas**

- 6.32 Where underground parking and/or servicing forms part of a larger development, access should be integral to the design of the development. Entrances and ramps should be discrete.
- 6.33 Entrances and adjoining areas of buildings are often spaces which require the integration of a number of competing needs such as the provision of bins, cycle storage, meters and inspection boxes and external lighting. These elements should be constructed with materials sympathetic to the site and surroundings. You can minimise the visual impact of storage areas by careful siting and incorporating planters to screen developments and incorporating green roofs as part of their structure.
- 6.34 Space and location requirements for the storage of waste and recycling can be found in this guidance in chapter on Waste and recycling storage. Further guidance on how access to site and parking areas should be designed can be found in CPG6 Transport.

**Boundary Walls, Fences and Railings**

- 6.35 Boundary walls, fences and railings form the built elements of boundary treatments. They should be considered together with the potential for elements of soft landscaping. For example, we encourage the combination of low brick boundary walls and hedges as a boundary treatment. Boundary treatments should:
- delineate public and private areas;
  - contribute to qualities of continuity and enclosure within the street scene; and
  - provide site security and privacy.
- 6.36 Due to the prominence of the boundary treatments in the streetscene we will expect the design, detailing and materials used to provide a strong positive

contribution to the character and distinctiveness of the area and integrate the site into the streetscene.

- 6.37 With regards to boundary walls, fences and railings, we will expect that:
- you consider repairing boundary walls, fences and railings before they are replaced;
  - they make a positive contribution to the appearance and character of the development site and to the streetscene;
  - you consider designs to be effective for their function.
  - the design and construction does not damage any on site or off site trees that are identified for retention (See paragraphs 6.15 to 6.18 above).
- 6.38 For boundary treatments around listed buildings or in a conservation area we will expect:
- the elements are repaired or replaced to replicate the original design and detailing and comprise the same materials as the original features
  - the works preserve and enhance the existing qualities and context of the site and surrounding area
- 6.39 Planning Permission is not required for the erection of a boundary treatment no higher than 1m where it abuts the highway or 2m on any other boundary. These heights are measured from ground level and include any structure that may be attached for example a trellis attached to the top of boundary wall.
- 6.40 Listed Building consent may be required for any works to boundary treatments within the curtilage of a listed building.

### **Types of landscaping**

- 6.41 Landscaping are divided into the following broad types:
- soft landscaping (planting);
  - hard landscaping; and
  - landscaping on building.

### **Soft Landscape Details (Planting)**

- 6.42 Soft Landscape is a term to describe the organic, vegetative or natural elements of Landscape Design. There are three main objectives in planting design (1) Functional (2) Ecological and (3) Aesthetic. Each of these objectives is likely to be inter related however one may be prioritised over another for the purpose of a particular project.
- 6.43 Functional objectives include:
- integrating a site with its surroundings;
  - providing spatial definition and enclosure;
  - directing pedestrian and vehicular movement;
  - providing shelter,
  - providing micro climatic amelioration and



- providing SUDS.

**Ecological Objectives include:**

- maintaining and enhancing natural processes; and
- increasing the biodiversity value of a site.

**Aesthetic Objectives include:**

- creating or contributing to the character of a place; and
- adding to people's sensory enjoyment in the use of a space.

**Crown canopy**

The uppermost layer in a forest or group of trees.

- 6.44 Landscaping schemes need to maintain and plant large canopy trees as a means of countering the negative effects of increasing urban temperatures due to climate change. Existing large canopy trees are part of the character of several areas in the Borough. In these areas in particular and other areas where the opportunity arises space should be made for the growth and development of large canopy trees. Large canopy trees are usually considered to be trees which reach a mature height of 15-20m+. Site design should make provision for the expansion of the crown canopy of these trees and sufficient soil volume to support a trees growth to maturity. As a general rule the soil volume required to support a healthy large canopy tree is 6m x 6m x 1m depth. The detailed requirements for the growth and development of large canopy urban trees can be found in "Up by the Roots" by James Urban (International Society for Arboriculture, 2008).
- 6.45 The long term success of planting schemes will determine species selection suitable for local growing conditions (soil conditions, temperature ranges, rainfall, sun light and shade) and provision for on going maintenance. Generally native species are considered to be most adapted to local conditions however there are a range of exotic plants which are at least equally adaptable to the unique ecology of urban areas and which provide an important contribution to a site's biodiversity.
- 6.46 Maintenance requirements should be considered at the design stage in terms of ensuring there is access for maintenance, whether maintenance materials need to be stored on site and that there are available sources of water. Water conservation should be intrinsic to the design of a planting scheme whether it is by selecting drought tolerant plants, maintaining soil conditions conducive to water retention with, for example, mulching or providing for on site water harvesting and grey water recycling.
- 6.47 Planning applications will be assessed against the degree to which planting schemes meet their objectives and that the chosen objectives are appropriate for the site. Planning applications should be accompanied by:
1. a statement of the design objectives of planting plans;
  2. planting plans indicating species, planting patterns, planting size and density; and

### 3. where appropriate managements plans.

#### **Hard Landscape Details**

- 6.48 Hard landscape is a term used to describe the hard materials used in landscape design such as paving, seating, water features, lighting, fences, walls and railings (see paragraphs 6.35 to 6.38 above for guidance on boundary walls, fences and railings and the chapter on Design excellence regarding the design of public space).
- 6.49 Hard landscape makes a significant contribution to the character of the Borough. The scale, type, pattern and mix of materials help define different uses and effects the perception of the surrounding buildings and soft landscape and overall quality of an area. To help integrate the development with its surroundings and contribute to the sustainability of the project we will expect:
- the selection of materials, patterning and methods of workmanship to consider those already at use in the area;
  - traditional and natural materials to be used, especially in Conservation Areas (Guidance can be found in Conservation Area Statements, Appraisals and Management Plans);
  - the use of salvaged and re used materials, where appropriate; and
  - all paving to be level and accessible where used by pedestrians, this needs careful consideration where the use of historic materials is proposed.
- 6.50 The Council will discourage the replacement of soft landscaping with hard landscaping in order to preserve the environmental benefits of vegetation identified above. However where hard landscape unavoidable we will seek sustainable drainage solution to any drainage (see CPG3 Sustainability chapter on Flooding).

#### **Lighting**

- 6.51 Lighting can make an important contribution to the attractiveness of an area. It is also important for the security and safety of an area. The design and siting of columns and lights can provide a significant role in the creation of the character of a place. Other lighting techniques include wall mounting, bollards with integral lights and ground level up lighters. While adequate lighting is required, the intensity of lighting should be appropriate to its function. Care should be taken not to over light which can lead to unnecessary light pollution and energy consumption and in some cases become a nuisance to neighbouring residential properties. Lightning can also become a disturbance to local wildlife, particularly bats, and can affect the wildlife that uses and lives on the canal.

#### **Landscaping on buildings**

- 6.52 Landscaping on buildings includes both soft and hard landscaping and occurs in the forms of green and brown roofs and green walls. Green roofs, brown roofs and green walls can provide important landscape detail, biodiversity improvements, prevent local flooding and keep a building insulated. See CPG3 Sustainability (Green roofs and walls chapter).

## 7 Shopfronts

### KEY MESSAGES

Shopfront alterations should respect the detailed design, materials, colour and architectural features of the shopfront and building itself. This section provides information on how to deal with the five key shopfront features:

- Shopfront components,
  - Signs and lighting,
  - Blinds and canopies,
  - Security shutters, • Cash machines.

- 7.1 Well designed shopfronts increase the attractiveness of a building and the local area and can have an impact on commercial success by increasing the attraction of shops and shopping centres to customers. This is particularly important in town centres and the character and appearance of where conservation area and listed buildings. On the other hand, insensitive shopfront design can harm the appearance and character of buildings and shopping areas
- 7.2 This guidance relates to Core Strategy Policy – CS14 – Promoting High Quality places and Conserving Our Heritage and Development Plan Policies – DP30 – Shopfronts – and to planning applications for new shopfronts and alterations for existing.



### When does this guidance apply?

#### General

- 7.3 This guidance applies to all applications which may materially alter the external appearance of a building or any element of the historic environment and therefore may require planning permission, or conservation area or listed building consent.
- 7.4 You will generally need planning permission for:
- a new shopfront;

- alterations to an existing shopfront including awnings and canopies, external security shutters, blinds, grilles and security measures; and
  - change of use will generally require planning permission.
- 7.5 Planning permission is not normally required for routine maintenance works, such as redecoration or straightforward repairs. For further detailed guidance check with the Council.
- 7.6 Any alterations (or replacement) of shopfronts that form part of a listed building will require Listed Building Consent and will need to be consistent with the age and style of the building. For further information see the chapter 3 Heritage of this CPG. More stringent controls will apply for the following works:
- re-painting a shopfront in a different colour,
  - installing a security alarm or extractor fan,
  - altering the shop interior, • installing blinds or shutters, and • advertisements.
- 7.7 Conservation Area Consent is required for the proposed complete or substantial demolition of any building in a conservation area. This includes the removal of a shopfront or of any feature that gives character to a building. In assessing applications to alter shopfronts within conservation areas special attention will be given to the desirability of preserving and enhancing the character and appearance of the Conservation Areas (for further information see chapter 3 Heritage of this CPG).
- 7.8 For shops in conservation areas, reference should also be made to the relevant Conservation Area Statement/Conservation Area Appraisal & Management Strategy (there are 39 in total). These describe the area and its special character and include guidelines that provide the framework for development proposals in the area and the appraisals contain audits of shopfronts of merit.
- 7.9 Advertisement consent is a separate procedure that applies to the display of advertisements on shopfronts. You can find further guidance in the document Outdoor advertisements and signs: A guide for advertisers (CLG, 2007) and chapter 8 'Advertisements, signs and hoardings' of this CPG).

#### **BUILDING REGULATIONS APPROVAL**

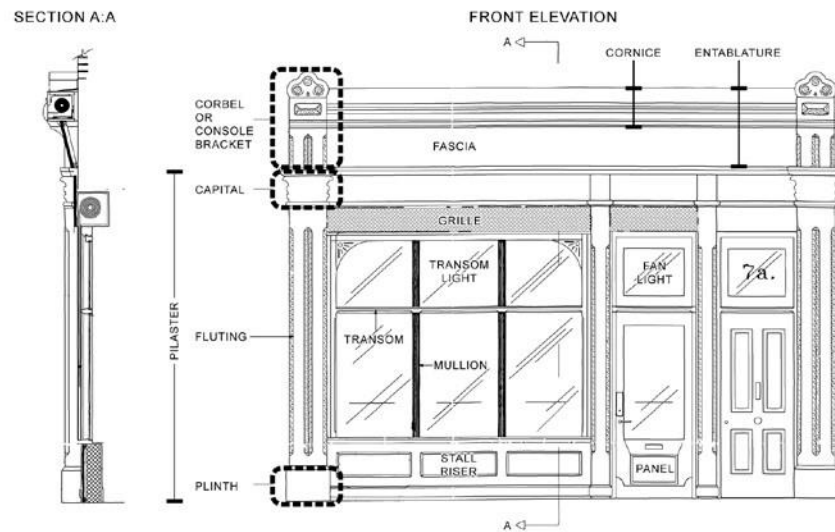
You need building regulations approval for all work which alters the shop's structure, entrance arrangement, changes its fire escape, or affects the level of access currently provided.

#### **Guidance for Shopfronts**

##### **Design and appearance of shopfronts**

- 7.10 The basic architectural features that make up shopfronts are illustrated in Figure 8.

Figure 8. Shopfront elements



### General principles

- 7.11 Shopfront alterations should respect the detailed design, materials, colour and architectural features of the shopfront and building itself, the following will need to be considered:
- Historic, locally distinctive or characteristic shopfronts which contribute to the townscape should be retained. In some cases the reinstatement of missing features will be encouraged.
  - New shopfronts should be designed as part of the whole building and should sensitively relate to the scale, proportions and architectural style of the building and surrounding facades.
  - Shopfronts forming part of a larger new development should be considered as an integral part of the overall design.
  - Standardised “house-style” frontages may have to be amended in order to harmonise with the surrounding context and respect the building, particularly in conservation areas and for listed buildings.
  - All shopfronts should be designed to provide access into the premises for all.

### Key shopfront components

- 7.12 The following are key shopfront design components you need to consider when making alterations to an existing shopfront:

#### Window Displays

- The window display is the main visual element of a shopfront. Shop frontages should be largely glazed to maintain a window display rather than creating a solid frontage (including obscured glass) which will be discouraged.

- On traditional shopfronts large expanse of undivided glass should be avoided. Vertical glazing bars (mullions) should be used to subdivide large windows to help visually relate the shopfront with the upper elevations of the building.

### **Entrances**

- The design of the door should be in keeping with the other elements of the shopfront. The solid bottom panel should align with the stallriser. The top of the door should align with the transom.
- Decorative tiling should be retained.
- All new build shop units and shopfronts should be designed to be fully accessible to everyone.
- In the case of existing buildings, particularly where a new shop front is proposed, the following guidance should be followed:
  - Shops that have a change in level from pavement to shop floor surface can usually incorporate ramped access into or within the shop. Exceptions preventing a ramped area to be created may include the presence of structural beams or floor slabs..
  - Entrance doors should be accessible to all, particularly wheelchair users and people with limited manual dexterity. 1000mm minimum clear door width in new buildings and 775mm door width in existing buildings where a new shop front or alterations to a shop front are proposed.
- to ensure that services are reasonably accessible to disabled people refer to Camden Planning Guidance on Access for all.

### **Shopfront recess**

- Where there is an existing shopfront recess - often found in older traditional shopfronts e.g. listed buildings and conservation areas - they should be retained.
- Traditional horizontally-operated lattice security gates can in some cases be employed to protect recessed shop entrances, but they should not extend across windows. On traditional shopfronts, removable timber or metal lattice style shutters is often more appropriate.
- New recesses in shopfronts will be strongly discouraged due to their potential for attracting anti-social behaviour.

### **Fascias**

- The fascia should be of a suitable size and proportion in relation to the building and should not normally extend above the cornice or below the capital as it would upset the overall balance and proportions of a shopfront or parade (see Figure 9 and Figure 10).
- Fascia signs should not obscure or damage existing architectural features. Deep box fascias which project beyond the shopfront frame should be avoided.
- Lettering on fascia signs should be proportionate to the scale of the shopfront. To aid identification, fascia signs should include the street number of the premises.
- Where a shopfront and fascia extend across two or more shop unit bays, the removal of intervening pilasters are not acceptable as it would:
  - weaken the frame's visual support to the upper floors; and

- disrupt the character and rhythm of a shopping frontage created by the widths of individual shopfronts.
- Lettering on fascia signs should be proportionate to the scale of the shopfront. Main fascias should also be of a suitable size and proportion in relation to the building and should sit between cornice and shopfront itself and should not project above or below the cornice level obscuring upper floor or shop windows.
- Fascia and box signs should not obscure or damage existing architectural features.

Figure 9. Good shopfront section and elevation

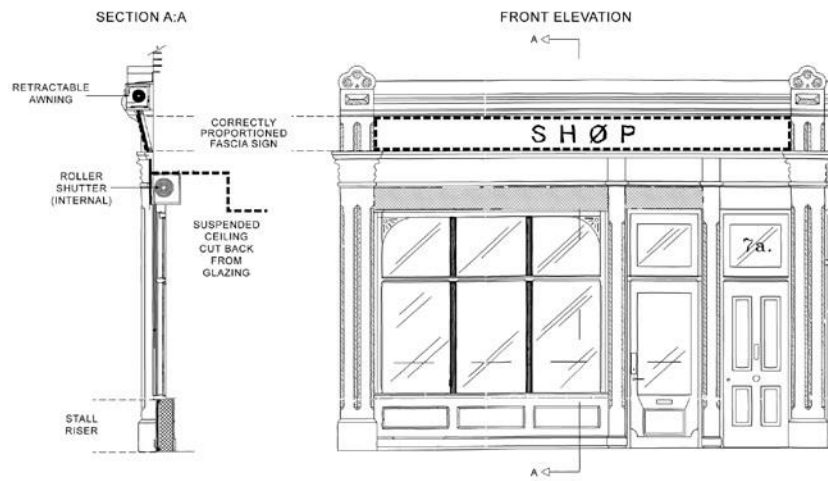


Figure 10. Inappropriate shopfront section and elevation



### Pilasters

- New pilasters are preferably placed in line with solid wall, not windows above, to emphasise their function. This is particularly important in the case of shopping frontages on sloping sites where existing stepped profiles of fascias and stallrisers should be preserved or reintroduced wherever possible.

### Stallrisers

- Stallrisers consist of solid elements below shop windows. They form a base to the shopfront display, and prevent the glazing from being damaged or soiled.
- Stallrisers should be retained and generally incorporated to any new shopfront on a period buildings.
- Where stallrisers are provided, they should be at least 300mm high or to the top of the pilaster base or door panel and faced in appropriate materials for the context. They



should not provide ledges that can be sat upon. Glazing should be brought to the front of a stallriser.

### **Colour and materials**

- Materials should be chosen for their durability and appropriateness to their location. Traditional materials such as timber, stone and render are the most appropriate for new shopfronts, particularly for listed buildings and in conservation areas.
- More contemporary materials such as colour-coated steel, aluminium and bronze instead of timber may be appropriate in some circumstances.
- Existing glazed brickwork or tiling should be retained.
- Colour schemes for shopfronts and in particular the projecting framework should be carefully considered, particularly in conservation areas and for listed buildings.
- Proposals should be accompanied by full details of materials, finishes and colours (or sample and specification cards).

### **Folding shopfronts**

- Folding shopfronts are not generally acceptable, particularly those on historic buildings such as listed buildings and those in Conservation Areas. When open, they erode the appearance of the shopfront, creating a visual void, and can increase disturbance to neighbouring properties, particularly in the case of food and drink premises. When closed they appear as a row of doors rather than a shopfront. This creates a heavier appearance than a shopfront mullion and reduces the area of glass in the shopfront.

### **Lightwells / grilles**

- Pavement lights or small lightwells covered with metal grilles are typically found in front of shopfronts. These provide light into the areas beneath whilst allowing shoppers close inspection of the window display.
- Creating open lightwells with railings in front of a shopfront is not generally acceptable as it prevents window shopping and disrupts the buildings relationship to the rhythm of the street. This is also the case if the shopfront has been converted into residential

accommodation.

### **Advertisements and signs**

- 7.13 Shops and businesses need to ensure that their name and other details are clearly displayed on their premises and, as a result, signs are among the most prominent forms of advertising on buildings. However, signs that are unsympathetically designed can cause significant harm to the building and the local townscape. Signs should relate well to the

character, scale and architectural features of the building and respect their local context.

- 7.14 Properties should only have one main fascia sign and one ancillary projecting or hanging sign per street frontage, although two projecting signs may be appropriate in cases of large shopfronts stretching across two or more shop units. Too many adverts/signs on a property contribute to visual clutter and can detract from the appearance of the street scene.

### **Projecting and hanging signs**

- 7.15 Projecting and hanging signs should normally be level with the fascia rather than below or above it. They should be positioned to the side of the shopfront at fascia level.
- 7.16 Signs at upper floor levels will be discouraged. Advertising for upper floor premises by lettering on windows or by suspended banners on large frontages will only be considered acceptable where advertising a specific event for a temporary period.

7.17 Advert signs - including those on canopies/blinds, should:

- be considered as an integral part of a shopfront or building, designed in from the outset with new structures;
- be in harmony with the existing building, and neighbouring ones, in terms of their proportions, design and materials;
- See Camden Planning Guidance on Advertisements, signs and hoardings.

### **Canopies, awnings and blinds**

- 7.18 Blinds can add colour and interest to the street scene. However, it is important to ensure that they do not dominate a shopfront or shop parade.

#### **Canopy**

A decorative structure providing a sheltered walk to the entrance of a building.

#### **Awning**

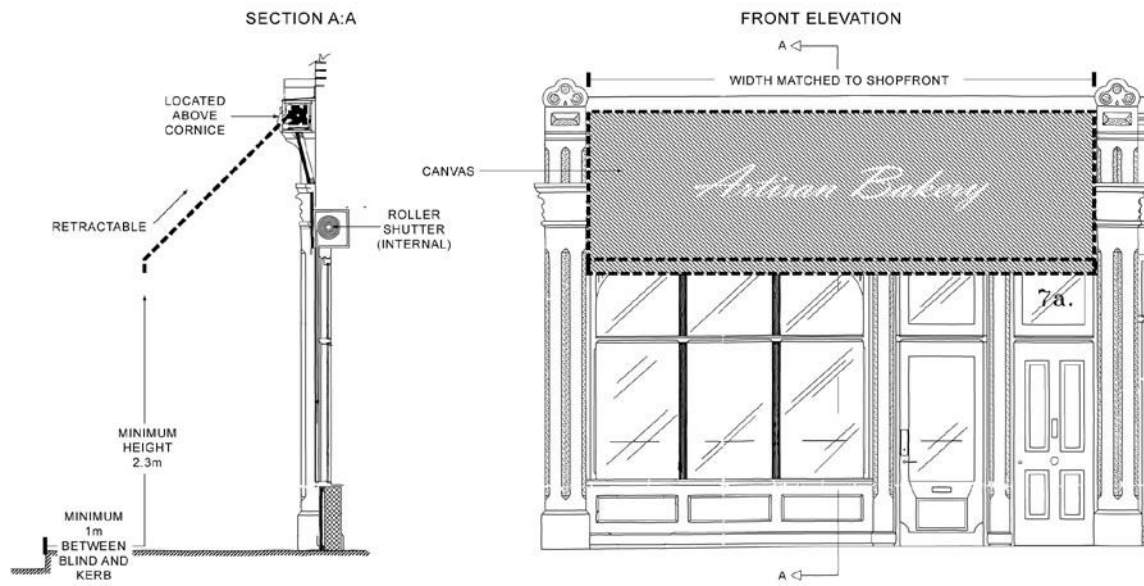
A sheet of canvas or synthetic fabric hung above a shopfront as protection against rain or sun

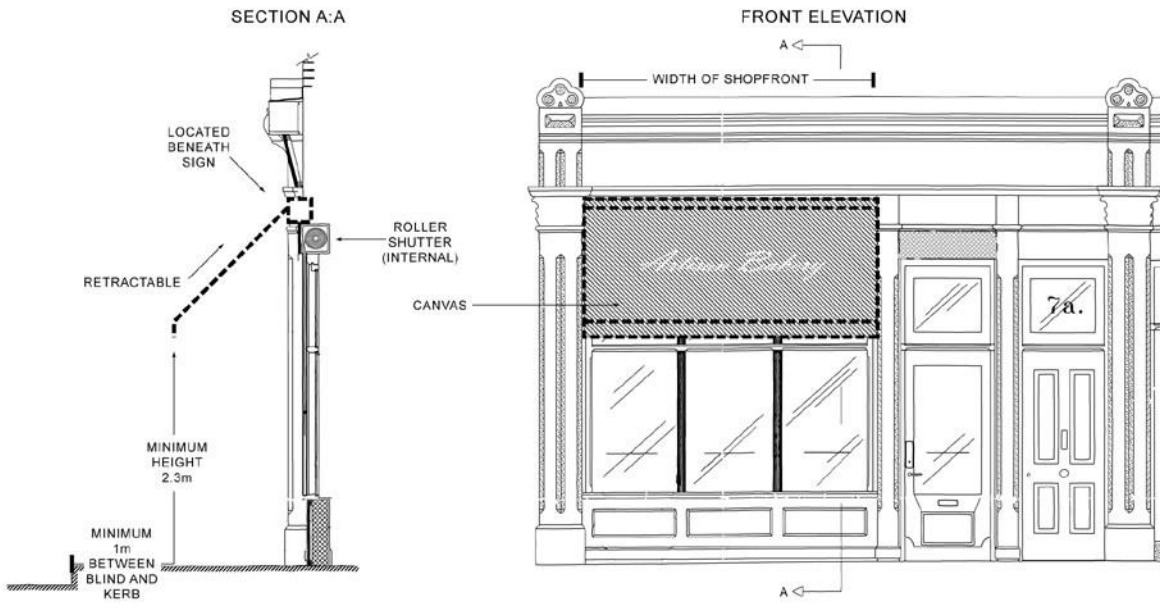
#### **Blind**

A structure of canvas or other material stretched used to keep sun or rain off a shop window.

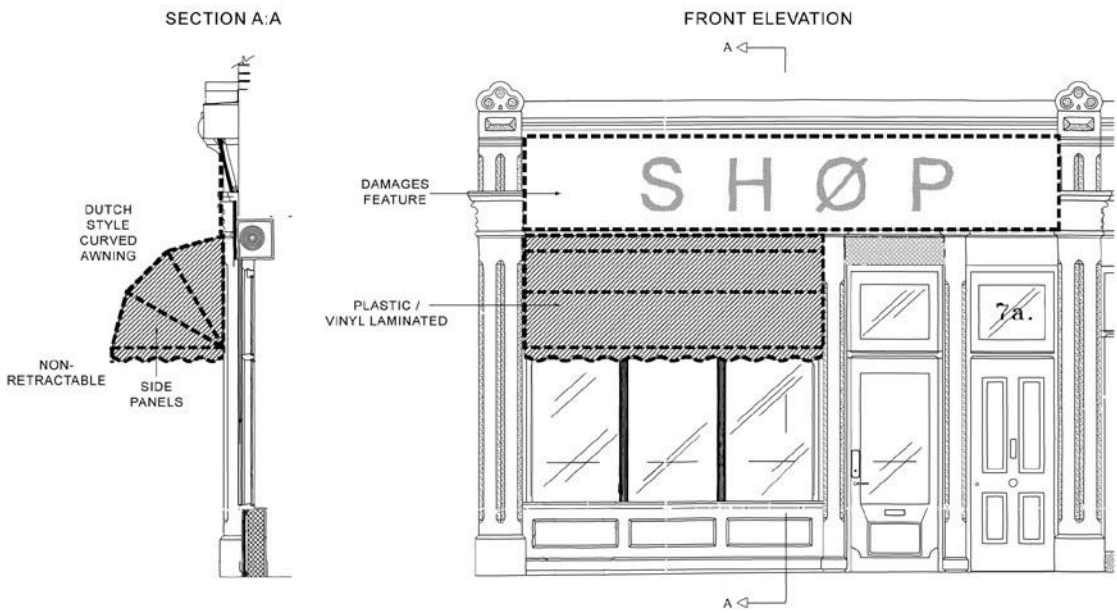
- 7.19 Shopfront canopies and blinds are only likely to be acceptable where they are:
- retractable;
  - traditional canvas;
  - blind box integrated with the overall design; • attached between the fascia and shopfront; and
  - be flush with the fascia level.

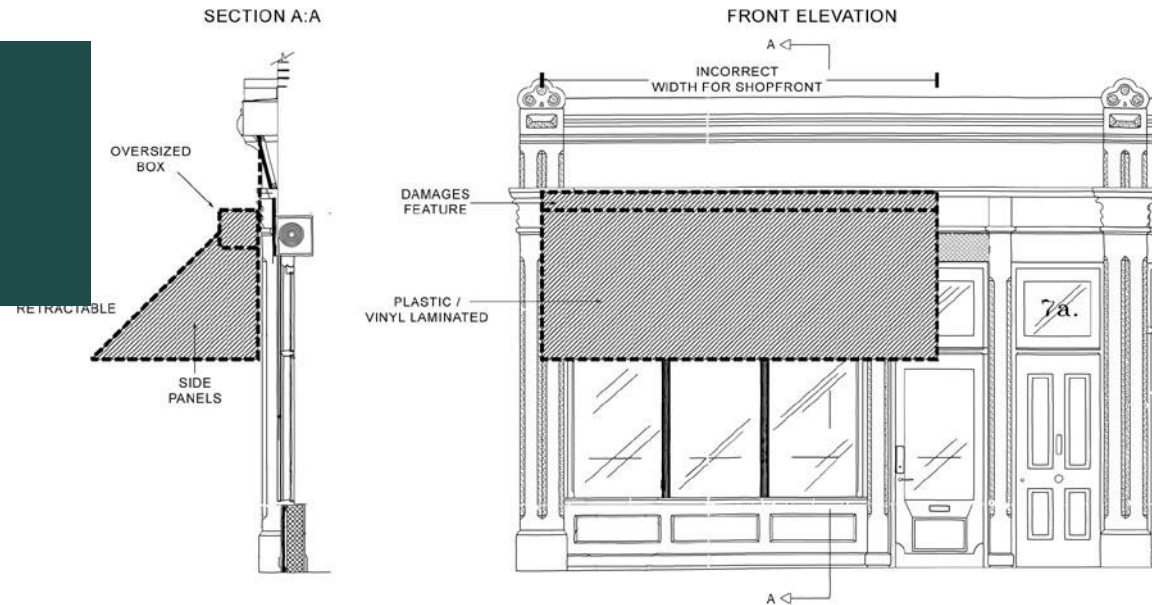
Figure 11. Appropriate ways to install shopfront awnings





Inappropriate ways to install shopfront awnings





### Retractable

7.20 Retracting awnings and blinds do not normally require planning permission, although they may require advertisement consent in certain cases. They should not:

- obscure or damage the fascia and other important features of the shopfront and buildings;
- have discordant and over-dominant shapes, but be appropriate in position, design and materials to the character and scale of both the shopfront, building and locality.

### Fixed

7.21 Fixed canopies, require planning permission. Acrylic / plastic “Dutch blinds”, or similarly reflective materials will be strongly discouraged, due to their bulk and materials and the resulting visual clutter.

### Materials

7.22 Canvas blinds are often characteristic features of historic shopfronts and should therefore be retained or replaced using a similar design – acrylic or plastic blinds are not normally suitable.

### Signage

7.23 Canopies or blinds with signage (a letter or words for advertising purposes or not), they are treated as advertisements and therefore advertisement consent will be required rather than planning permission (See chapter 8 ‘Advertisements, signs and hoardings’ in this CPG).

7.24 In general all blinds should be designed and installed to:

- ensure public safety;

- incorporate a minimum of 2.3 metres between the bottom of the blind and the pavement; and
- incorporate a minimum of 1 metre between the blind and the kerb edge.

### **Shopfront security**

- 7.25 Security shutters can be visually unattractive and create a 'dead', hostile appearance (especially out of opening hours), which can affect the commercial viability of an area and harm the pedestrian experience.
- 7.26 These guidelines offer suggest the most appropriate means of providing security protection while minimising impacts on the appearance of the shopfront, the building and the character of the area.

### **Shutters**

- 7.27 The Council strongly encourages internal rather than external shopfront security measures. Other forms of enhanced shopfront security should be considered instead of external shutters. For example, improved internal lighting, alarm systems, the use of toughened or laminated glass, etc. In cases where external measures (shutters, grilles or alarm boxes, etc) are proposed they would only be permitted where they do not harm the character of shopfronts, such as internal brick bond grilles or collapsible gates.
- 7.28 External security shutters will normally require planning permission, whilst internal shutters normally do not. Where internal shutters are installed they should be set back to leave a window display. In the case of listed buildings, the installation of any shopfront security measures, external or internal, will require listed building consent. On listed buildings, there will be a presumption against the use of external security shutters and grilles in favour of internal.
- 7.29 Where an external shutter is proposed it may only be considered acceptable provided it is integrated into the shopfront in terms of design, materials and colour. External measures should avoid using solid roller shutters. This includes the 'pin-hole' versions that rely upon internal illumination for any transparent effect. These designs have negative environmental impacts including:
- obscuring the shopfront and hiding window displays;
  - attracting graffiti;
  - preventing natural surveillance;
  - creating a hostile and unsafe appearance in streets and shopping centres; and
  - being visually unattractive.

### **Shutter boxes**

- 7.30 Shutter boxes should be discrete and should not project forward of the fascia or obscure any architectural features. They should be concealed wherever possible, for example set behind or within the fascia panel, the guide rails concealed within the frame of the shopfront and shutter should be close onto the stallriser.

## Grilles

- 7.31 Roller grilles are preferable to solid or pin-hole shutters as they provide security without obscuring window displays and allow views of the shop interior, which enhances surveillance and security.

## Removable grilles

- 7.32 Removable or collapsible grilles can be used internally or externally and in both cases allow a certain degree of visibility. These only require planning permission if installed externally. However, listed building consent will also be required for internal grilles in listed buildings.
- 7.33 Removable grilles are expected to remain in place only outside trading hours and should be stored inside at all other times. Any fixings should be discretely placed and must not harm architectural features or mouldings.
- 7.34 Where there is a recessed entrance it is preferable to install 'Concertina style gate between the openings.

## Finishes

- 7.35 All grilles and shutters should have an acceptable finish. They should be coloured (painted, powder coated or stove enamelled) to match the rest of the shopfront, including signs. Uncoated shutters, galvanised steel, a milled finish or anodised aluminium are not considered acceptable finishes. In the exceptional cases where solid shutters are acceptable, original designs by artists will be encouraged provided they respect their location, particularly in Conservation Areas.

## Burglar Alarms

- 7.36 Burglar alarm devices must be sited so that they are both adequately visible as a deterrent but do not detract from the visual character of the shopfront.

## Cash machines

- 7.37 Cash machines require planning permission and, in the case of listed buildings, listed building consent. Illuminated advertising for cash machines should be discreet and is subject to advertisement consent.
- 7.38 Cash machines (also known as cash points and ATMs) are only likely to be acceptable provided they are:
- treated as an integral part of a building's design wherever possible;
  - not dominant in the shop display frontage in terms of size or materials;
  - positioned sensitively and not be located where queuing could cause problems;
  - with minimal amount of display material;
  - located on the busiest elevation of a building to reduce the risk of robbery;
  - fully accessible to disabled people in both location and detailed arrangement;
  - and

- in existing bank buildings of traditional design they are most successfully inserted into existing stone recesses or beneath window bays.

### **Further information**

7.39 English Heritage has also prepared guidance on heritage assets within:

- English Heritage – ‘Easy Access to Historic Buildings’ 2012 - [www.english-heritage.org.uk](http://www.english-heritage.org.uk)
- English Heritage – ‘Easy Access to Historic Landscapes’ 2013 - [www.english-heritage.org.uk](http://www.english-heritage.org.uk)

7.40 For further guidance on how to make shopfronts more accessible to all users as well as disabled users, see:

- The Disability Rights Commission publication “Making access to goods and services easier for disabled customers: A practical guide for businesses and other small service providers
- BS 8300:2009+A1:2010 ‘Design of buildings and their approaches to meet the needs of disabled people’ – Code of Practice’ (BSI)
- Inclusive Mobility – A guide to best practice on Access to Pedestrian and Transport Infrastructure, 2005 (Dept for Transport).



## 8 Advertisements, signs and hoardings

This section has been superseded by CPG Advertisements, adopted March 2018.

### KEY MESSAGES

In general, the most satisfactory advertisements are those which take into account:

- the character and design of the property;
- the appearance of the surroundings; and
- the external fabric of the building.

8.1 The purpose of this guidance is to provide advice on the design and siting of advertisements so that they contribute positively to the appearance and character of an area. All advertisements affect the appearance of the building, structure or place where they are displayed, to the extent that they can sometimes be the most dominant feature in an urban setting.

8.2 This guidance relates to Core Strategy Policy CS14 Promoting high quality places and conserving our heritage and Development Policies DP24 Securing high quality design and DP30 Shopfronts.

8.3 This guidance applies to all advertisements requiring advertisement consent, i.e. those which do not have "deemed consent" under the regulations.

### DEEMED CONSENT

This allows the display of certain "specified classes" of advertisement without first having to make an application to the local planning authority

8.4 Guidance on advertisements is also contained within Outdoor advertisements and signs: A guide for advertisers (CLG, 2007, [www.communities.gov.uk/publications/planningandbuilding/outdooradvertisements](http://www.communities.gov.uk/publications/planningandbuilding/outdooradvertisements)). Where advertisements have deemed consent and do not require formal advertisement consent the guidance in this document should still be applied as a matter of good practice. Reference should also be made to chapter 7 Shopfronts, in this guidance, and the Fact Sheet on Estate agent boards.

### What advertisements and signs are acceptable?

8.5 Good quality advertisements respect the architectural features of the host building and the character and appearance of the surrounding area. As a general guide, the most satisfactory advertisements are those which take into account the character and design of the property, its surroundings and alter the external fabric of the building as little as possible.

### All advertisements

8.6 Advertisements and signs should respect the form, fabric, design and scale of the host building and setting. All signs should serve as an

78 Camden Planning Guidance | **Design** | Designing safer environments

integral part of the immediate surroundings and be constructed of materials that are sympathetic to the host building and the surrounding area. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment.

8.7 Generally advertisements will only be acceptable at fascia level or below. Advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties. If an advertisement

is required at high level for a specific business use then this will usually be restricted to non-illuminated images on windows.

**Fascia**

Runs horizontally across the ends of the roof rafters, below the lower edge of the roof.

- 8.8 — Advertisements will not be considered acceptable where they impact upon public safety, such as being hazardous to vehicular traffic (e.g. block sight lines, emit glare) or pedestrian traffic (e.g. disrupt the free flow of pedestrian movement).
- 8.9 — Advertisements in conservation areas and on or near listed buildings require detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.

**Advertising on street furniture**

**Street furniture**

A collective term for objects on streets and roads, including benches, bollards, post boxes, phone boxes, streetlamps, traffic lights, traffic signs, bus stops etc

- 8.10 — Free standing signs and signs on street furniture will not normally be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway.

**Illumination**

- 8.11 The illumination levels of advertisements should be in accordance with the standards set by the Institute of Lighting Engineers Technical Report Number 5 (Second Edition).
- 8.12 The type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon, etc) should be determined by the design of the building. Illuminated signs should not be flashing or intermittent, whether internal or external.

- 8.13 — Externally illuminated signs should be unobtrusively sized and sited. Spotlights and trough lights should be fixed and sized as discreetly as possible. Corporate designs involving internally illuminated signs may need to be modified where they are considered unsuitable, especially in residential areas, or conservation areas, or on listed buildings.

**Trough lighting**

An enclosed sign lighting unit using high powered fluorescent tubes.

- 8.14 To ensure that an advertisement does not become unduly dominant in the streetscene, disturb adjoining residents at night, or cause safety hazards to drivers, consideration should be given to the:

- intensity of illumination;
- surface area to be illuminated; and
- positioning and colours.

8.15 Internally illuminated box signs are discouraged. Generally, the internal illumination of individual letters, rather than the whole fascia or projecting sign on a shopfront, will be more appropriate.

### Hoardings

#### **Hording**

A billboard or large outdoor signboard.

8.16 Where advertisement consent is required for the display of hoardings, the following guidance will be applicable:

8.17 Advertisement hoardings or posters will not usually be acceptable in predominantly residential areas and will be carefully controlled in conservation areas and on or near listed buildings to ensure that they do not detract from the area's and building's character and appearance. However, if an area has a mix of uses or is predominantly in commercial use some poster or hoarding advertising may be acceptable where they satisfactorily relate to the scale of the host building or feature and its surroundings. They should be designed and positioned as an integral feature of the building. Some guidelines on when hoardings will not be considered acceptable include:

- in locations where they may prevent or significantly damage views or obscure light;
- where they are forward of the face of adjoining buildings;
- where they project above roof ridge/eaves level;
- where they obscure architectural features or landmarks (including windows or window recesses); and
- on side walls where they would be unduly dominant.

8.18 Temporary poster hoardings used to screen buildings or construction sites while work is being carried out have deemed consent under the 2007 Regulations (please refer to Class 8 in the regulations for specific

80 Camden Planning Guidance | **Design** | Designing safer environments

details) for commercial, industrial or business uses only. This deemed consent is not available for any residential development and is also not available in conservation areas.

8.19 The impact of illumination will be taken into consideration and where it is considered to be a nuisance or out of character with the area then it will not be considered acceptable.

### Shroud / banner advertisements

#### **Shroud advertisement**

Large scale advert, covering an entire building elevation, often used to shield construction work.

8.20 Shroud advertisements come in a range of forms but are generally large scale and can cover the entire elevation of a building. As a result of the scale and size of shroud advertisements their appearance can create a conflict with the surrounding environment and the streetscene and, where the advertisement partially obscures a building, the visual appearance of the building itself. However, they can help to shield unsightly construction work.

8.21 Conservation areas and listed buildings are particularly sensitive to these types of advertisements as they can appear overwhelming, and disrupt the appearance of a high quality built environment. Therefore, given the scale and size of shroud advertisements these types of

advertisement proposals will only be considered acceptable primarily in commercial areas and only where they screen buildings under construction, alteration or refurbishment. If considered acceptable they will be allowed for a temporary period and should be removed on completion of the works should they be sooner than the approved period. Longer consents will require additional advertisement consent.

~~8.22~~ Shroud on scaffolding will only be permitted where:

- ~~• The scaffolding covers the entire elevation of the building and the netting on the scaffolding contains a 1:1 image of the completed building which is undergoing construction work (scaffolding is only to be erected for the purposes of carrying out building works and will be removed upon completion of the works); and~~
- ~~• The advertisement covers no more than 20% of each elevation and is not fragmented. The advertisement must also respect the architectural form and scale of the host building. Where shroud and banner advertisements are considered acceptable on listed buildings or in conservation areas the advertisement should not cover more than 10% of each elevation and should not be fragmented. The location of the advertisement on the shroud will depend on the character of the local built form and the nature of views within it.~~
- ~~• In some highly sensitive locations or where the building plays a particularly important role in the appearance of the area, a visual representation of the building that is shrouded may be considered necessary to mitigate any harm to the appearance of the area.~~

~~8.23~~ Banner advertisements on buildings will only be permitted where:

- ~~• They relate to landmark or unique buildings, such as festival venues, museums, and do not detract from the appearance and form of the host building or the surrounding environment.~~
- ~~• In some commercial areas flags or banners may be considered a suitable form of display. Within residential areas, conservation areas, and on or near listed buildings we will be primarily concerned with safeguarding the amenity, character and appearance of these areas and buildings and therefore it is unlikely that such advertisements will be supported.~~

~~8.24~~ NB: The erection of a banner or shroud advertisement may require a specific licence from our Highways Management Team. If advertisement consent is granted for a banner or shroud, this does not indicate that a licence will also be granted. The Highways Management Team should be contacted for more information. For information on licences please contact the Camden Highways Management Team.

## 9 Designing safer environments

### KEY MESSAGES

- You should demonstrate that all impacts of your proposal on crime and safety have been considered;
- Security features should be considered early in the design process.
- Designing out crime features should complement other design considerations.

- 9.1 Good design, where due consideration is given to community safety, can create safe and attractive places to live and work and also prevent the need for security measures which can be expensive, unattractive and reactive in nature.
- 9.2 The aim of this guidance is to ensure that development contributes towards breaking down the link between the built environment and crime and anti-social behaviour (ASB), wherever possible, by ensuring that all developments consider and address any impact on crime and the perceptions of crime that may arise.
- 9.3 This guidance relates to Core Strategy policy CS17 Making Camden a safer place, and Development Policy DP24 Securing high quality design.
- 9.4 This guidance applies to all planning applications that will result in a physical alteration to the built environment that may have an impact on crime, anti-social behaviour or community safety. **How can I design safer environments?**

### General principles

- 9.5 In accordance with Core Strategy policy CS17 Making Camden a safer place, we will require applicants to demonstrate that all impacts of their proposal on crime and community safety have been considered and addressed. Applicants should be able to demonstrate that they have consulted the Police Crime Prevention Design Adviser (details of which can be found at [www.securedbydesign.com](http://www.securedbydesign.com)) and that proposals take into account the advice given, where appropriate.

#### Police Crime Prevention Design Officer

Can provide professional risk management advice, at the design stage, on all aspects of security of a development.

#### Urban design

Urban design is concerned with improving the quality, appearance and functionality of places, particularly the public realm. It works on a scale larger than architecture and smaller than town planning.

**Designing out crime**

A method of minimising crime by designing or organising the environment in such a way that the opportunity for crime is reduced and potential offenders feel exposed and uncomfortable.

9.6 Good urban design will significantly reduce opportunities for crime and anti social behaviour. Security features should be considered early in the design process as it can be more difficult to incorporate features in a sensitive way at a later stage. It is important to take a proactive approach at an early stage to reduce risks and opportunities for crime and ASB to occur, rather than relying on reactive measures such as CCTV, which should be used as part of a package of measures to reduce crime. Incorporating designing out crime features into a development should complement other key design considerations. High quality architecture and design should still be achieved.

9.7 You should consider:

- good urban design principles, including active frontages to buildings and interesting and innovative design treatments that can reduce the need for physical barriers;
- using a local assessment of design to ensure that places are both well connected and secure;
- the effect of designing against crime on properties adjacent to and in the vicinity of a development, and the personal safety of people who will use the locality; and
- avoiding a 'fortress approach' as it tends to be unattractive and can result in an oppressive environment for both residents and passing pedestrians.

**Active frontage**

Building frontages which add interest and life to public spaces, through the use of doors and windows or shopfronts and lively uses.

9.8 We expect developments to reflect the considerations contained within the publication Safer Places – The Planning System and Crime Prevention (ODPM April 2004). This identifies seven attributes of sustainable communities that are particularly relevant to crime prevention. Therefore, we expect the following elements to be considered in planning proposals:

Access and movement	to, from and within any development
Structure	layout, type and design of buildings, and of public space
Surveillance	maximisation of overlooking, lighting, the promotion of active frontages and through the introduction of crime prevention measures

Ownership	clear delineation between public, communal, semi-private and private space
Physical protection	strengthening of the security of building in order to reduce or minimising the risk of attack or theft
Activity	compatible mix of uses and attractiveness and sustainability of any public realm components
Management and maintenance	inclusion of details of management and maintenance systems where appropriate

- 9.9 We require a crime impact assessment as part of the Design Statement to be included with all applications of 10 residential units or more or for sites of 1000 sq m or more. This should demonstrate that any impact on crime and antisocial behaviour has been considered, addressed and where appropriate designed out. For smaller schemes it will be expected that designing against crime principles will be incorporated into the scheme. These designing against crime principles are set out in Safer Places: The Planning System and Crime Prevention, ODPM, 2004.

**Design Statement:**

Documents that explain the design thinking behind a planning application. They should show that you have thought carefully about how everyone will be able to use the places you want to build.

### Addressing Community Safety Concerns

- 9.10 To enhance community safety, we would like to see developments consider:
- maximising accessibility by encouraging usage of safe routes to, from and through developments;
  - the design and layout of pedestrian, cycle and vehicular routes into and within the site, including how these integrate with existing patterns; and
  - lighting and the use of CCTV where appropriate, accessibility and ease of movement through a development scheme, which can enhance overlooking, thereby reducing the opportunity for crime and anti-social behaviour and increasing perceptions of personal safety.

### Movement and Gating

- 9.11 Gating can be seen as a solution to problems of crime and anti social behaviour. Gating and other ways of restricting access to developments can have a divisive effect on communities, creating separate residential areas and often necessitating long alternative routes. It can create and reinforce negative perceptions of an area and for these reasons gating should be seen as a last resort.

- 9.12 We expect that developments will demonstrate the accepted principles of good urban design as laid out by the Commission for Architecture and the Built Environment (CABE) in 'By Design', a companion guide to Planning Policy Statement 1, which sets out the 7 objectives of urban design. One of these that is particularly relevant to movement and gating is "Ease of movement – a place that is easy to get to and move through. To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land use and transport."
- 9.13 We will not support applications for restricting access to, from or gating of, the public highway or designated open spaces that are currently accessible to the public. All applications which seek to reduce access to, from or through the public spaces will need to:
- explain clearly the rationale for the reduction in access and be able to demonstrate that it is an appropriate solution, which minimises negative impacts in, adjacent to and in the vicinity of the development;
  - provide evidence of anti-social behaviour and crime to support the proposed restricted access; and
  - demonstrate the alternative steps they have taken to address the problems.
- 9.14 We will consider whether the proposed restriction will:
- have an adverse impact on accessibility in the local area by reducing the opportunity for local people to use established routes. For further information refer to CPG4 Protecting and improving the quality of life (Access for all chapter);
  - result in the loss of natural surveillance by neighbours and passers-by thereby increasing the opportunity for crime and anti-social behaviour;
  - necessitate long alternative routes to take account of the proposed restriction;
  - have an adverse impact on the community cohesion and security of the local environment by creating separate residential areas;
  - have an unacceptable adverse impact on the safety or perception of safety adjacent to and in the vicinity of the development;
  - prevent the type of anti-social behaviour crime evidenced by the applicant; and
  - prevent unauthorised entry into the development.
- 9.15 In all cases we will consider time limiting permissions for gating, thereby allowing flexibility should any incidents of crime and anti-social behaviour decrease.
- 9.16 Rather than gating we wish to see developments enhance community safety by maximising accessibility through encouraging the usage of routes to, from and through development. Good design, lighting, the



use of CCTV where appropriate and public accessibility can reduce the opportunity for crime and anti-social behaviour.

### **Licensed premises and alcohol related violence**

9.17 Licensed premises, because of their nature can be the location of alcohol related violence. This can be limited by good design, employing open layouts and maximising natural surveillance where possible. Where an application is received for alterations to new or existing licensed premises, we will seek to:

- maximise visibility into the premises by ensuring, where possible, clear glass is used on all street elevations; and
- reduce the number of entry points to a minimum.

### **Recesses**

#### **Recesses**

Set-backs in the line of building frontages.

9.18 Recesses, including recessed doorways, can provide the opportunity for anti-social behaviour and can have an impact on crime and the perception of crime.

9.19 In consultation with our Building Control Service and the Fire Authority, opportunities can be taken to reduce the number of emergency exit doors within recesses or minimise their impact. Bringing the doors forward should be investigated when schemes are being designed, by:

- allowing the doors to open inwards, where there are 60 users or less of emergency exit doors and it is not a licensed premises;
- allowing the door to continue to open outwards if there is a private forecourt which it can open onto. Measures must be put in place to divert pedestrians away from the opening arc of the doors; and
- allowing for the outward opening of the door where there are 60 or more users and the footway is very wide.

9.20 Where bringing the doors forward is deemed unacceptable, it should be ensured that:

- the recess is no deeper than 600mm or no greater than required for the opening of the door within the recess;
- the edges of the recess are angled to improve visibility;
- transparent elements are incorporated into the door;
- the recess is widened so that it does not create hidden spaces; and
- where appropriate and if the building is unoccupied for periods of time, open-weave grille shutters or collapsible gates are installed, to be opened when the building is occupied.

9.21 In all circumstances, overlooking of the recess should be maximised where possible by considering replacing the emergency exit door with an all glazed or top half glazed door with thick laminated glass. An open

weave grille can be installed internally for additional security. Further guidance is contained within chapter 7 Shopfronts, in this guidance.

### **Walls and fences**

- 9.22 Careful consideration should be given to walls and fences, or other boundary treatments. If boundary walls are used in certain locations, where anti-social behaviour is identified as a problem, they should not have a flat horizontal top, which is inviting to sit on. Angled tops could be used to avoid the wall being used as an informal seat. Further guidance is contained within chapter 6 Landscape design and trees, in this guidance.

### **Public realm and street furniture**

#### **Street furniture**

A collective term for objects and pieces of equipment installed on streets and roads, including benches, bollards, post boxes, phone boxes, streetlamps, traffic lights, traffic signs, bus stops etc

- 9.23 Well designed street furniture and public art in streets and public places can contribute to a safe and distinctive urban environment. Street furniture should not obstruct pedestrian views or movement or be positioned to encourage anti social behaviour.
- 9.24 All features within public space and elements of street furniture should be designed to make a positive contribution to community safety and discourage anti-social behaviour. Careful consideration should therefore be given to their location and detailed design.

#### **Cash machine boxes**

- 9.25 Cash Machine boxes are stand-alone structures located on the footway, which house Automatic Teller Machines (ATMs). We will refuse the siting of these in areas of high crime. Permission will only be granted where the police designing out crime advisors believe that it would not act encourage crime or interrupt important sightlines. Where they are allowed, the design should ensure maximum visibility into and through the proposed structure. Please see chapter 7 Shopfronts, in this guidance for further information.

#### **Telephone boxes**

- 9.26 Although we have only limited and discretionary control over the siting and appearance of public call boxes, we are consulted on the siting of new telephone boxes on the public highway. In all cases we will request that the provider demonstrates the need for the siting of the new facility. In certain areas of the Borough, public call boxes can be seen as crime generators and in these areas we will consider whether the proposed location will have an impact on crime levels.

- 9.27 All new phone boxes should have a limited impact on the sightlines of the footway. The size of the box or other supporting structure that the phone box is in should be minimised to limit its impact on the streetscene and to decrease the opportunities for crime and anti-social behaviour. There should be a minimum footway width of 2m adjacent to the phone box. Designs which are dominated by advertising space are not acceptable. Any advertising should not be placed where it significantly reduces natural surveillance or CCTV coverage of, or into, the call box. Designs should seek to maximise views into and through the phone box and along the footway.

### Lighting

- 9.28 Good lighting can have a number of benefits, including:
- enhancing the built environment by increasing the potential for natural surveillance;
  - reducing the opportunity for criminal activity to take place;
  - where crime does occur, increasing the likelihood of it being challenged and/or reported; and
  - ensuring that CCTV footage is of sufficient quality to assist in the detection of crime.
- 9.29 Where used inappropriately, however, it can result in light pollution which is intrusive and can have an impact on residential amenity. It can also result in pooling of light which means that pedestrians walk from areas well lit to those with little light. This impacts on their perceptions of their own safety and can influence the way in which they use their environment.
- 9.30 We will seek to encourage good quality lighting provision in all developments to use metal halide lamps or the equivalent and high quality refractors where appropriate to maximise the perception of colour and increase the controllability of where light falls. This will encourage uniformity of light provision. Uniformity of light is very important in people's perception of how well an environment is lit and has a greater impact than absolute lighting levels. It is also necessary for people with sight impairments, whose eyes adjust to different light levels more slowly than fully sighted people. Lighting should be designed so as to minimise glare and reflection problems.
- Metal halide lamp**  
A type of light source used in a variety of applications which produces a large amount of quality light without being a huge, bulky light bulb.
- 9.31 Where lighting is provided to increase on-site security, this should not have an adverse effect on the perception of lighting levels in areas adjacent to the site and where possible should enhance this provision.
- 9.32 Mounting of lighting should be considered to ensure that it is resistant to vandalism and does not act as a climbing aid.

### **Landscaping**

- 9.33 Where landscaping is created it can be important to consider sightlines as the landscaping matures. There may be a requirement for a maintenance agreement to ensure that planting as it matures does not impact on sightlines or CCTV coverage.

### **Maintenance**

- 9.34 How an area is maintained can have a major impact on people's perceptions of crime and anti-social behaviour. Where a development creates public space we may seek to agree a management and maintenance plan with the applicant.

### **Car parks**

- 9.35 Applications for car parks should demonstrate that they are well lit and secured in order to discourage anti-social behaviour. Underground car parks in particular should be securely designed and access limited to users.

### **Anti-terrorism**

- 9.36 Terrorism can pose a very real threat in some areas of the borough. It is beyond the scope of this document to deal with these threats in detail but we will work with counter terrorism security advisors (CTSAs) on a case by case basis. Where appropriate the principles of the Government guidance, *Crowded Places: The Planning System and CounterTerrorism* should be applied.

### **Conservation Areas and Listed Buildings**

- 9.37 Incorporating designing out crime features into a development should complement other key design considerations such as the character and appearance of conservation areas and listed buildings. Measures for designing out crime will require careful consideration in these often more sensitive settings and some may not be considered appropriate within conservation areas or within the setting of a listed building. In these cases imagination should be used to come to a sensitive alternative solution.

### **Design and access statements**

- 9.38 In situations where crime and anti-social behaviour is a concern, applicants should demonstrate within Design and Access Statements their understanding of the local issues relating to crime, and how the design will address them. In these situations, Design and Access statements should outline:
- Current levels of crime and anti-social behaviour in the immediate area;

- Activity levels in the streets and public spaces at all times of the day and night;
- The extent of natural surveillance of neighbouring properties, streets and public spaces; and
- Any other relevant local characteristics. **Further information**

9.39 For further guidance on designing against crime:

- Safer Places: The Planning System and Crime Prevention, ODPM, 2004.

## 10 Recycling and Waste Storage

### KEY MESSAGES

Planning for waste recycling and storage should ensure that developments accommodate:

- adequate space (designed) for the storage of recyclables and waste; • safe location - accessible for all users and collectors and minimise nuisance to occupiers and neighbours (and their amenity space) e.g. noise, obstruction, odours, pests, etc.;
- recycling and refuse collection for any waste contractor (and allow for reasonable changes to collection services in the future);
- containers should have designated storage areas; and
- sensitively designed/located, especially in conservation areas/or listed buildings.

- 10.1 This section seeks to ensure that appropriate storage for recyclables and waste is provided in all developments in Camden. Its key aim is to assist those involved in the design and management of buildings to best provide for the storage of waste and maximise the amount that can be sent for recycling.
- 10.2 This guidance relates to Core Strategy Policy – CS18 - Dealing with our waste and encouraging recycling and Development Plan Policies - DP26 – Managing the impact of development on occupiers and neighbours and DP22 – promoting sustainable design and construction.
- 10.3 This guidance also relates to the British Standard BS5906-2005 – Waste management in buildings – Code of practice.
- 10.4 The following section provides detailed guidance on the space requirements for both internal and external storage features. It covers residential developments of 6 or fewer dwellings, residential developments of more than 6 dwellings, and non-residential or commercial dwellings.
- 10.5 This guidance applies to:
- all new build developments;
  - developments that significantly increases amount of floor space and on-site waste; and
  - other activities that significantly increase the amount of waste generated on-site.
- 10.6 This guidance does not cover construction and demolition waste, or hazardous waste. For further information on these topics please refer to CPG4 Sustainability, particularly the chapter Sustainable use of Materials and Hazardous substances and Construction Management Plans.

## Guidance on standards for waste storage

- 10.7 This section provides detailed guidance on the requirements for both internal and external recycling and waste facilities to ensure designs allow sufficient space for the storage of recyclable material and waste in developments. To encourage occupants to recycle, internal storage areas should be designed into each unit of a new development. This will enable occupants to segregate their waste into refuse and recyclables, and store it temporarily, until it can be transferred to external bins. **Residential development of 6 dwellings or fewer**

### Space requirements

- 10.8 Residential development of 6 dwellings or fewer are usually serviced by a kerbside recyclables and waste collection. The designs for recycling and waste facilities need to provide sufficient internal and external storage areas for each unit, ensuring:
- that internal space is provided for recycling and refuse storage, comprising adequate space for a recycling receptacle (typically a green reusable box or bag), food waste caddy, and waste bin for nonrecyclables. Kitchens and utility rooms are generally the most appropriate locations;
  - there is external storage for mixed (commingled) recyclables, organic kitchen waste and non-recyclable waste, providing space for the following:
    - a free-standing 140l or 240l wheelie bin for the storage of commingled recycling;
    - a free-standing kitchen waste caddy;
    - seasonal storage of garden waste i.e. in large hessian sacks;
    - a free-standing receptacle for the storage of refuse (should the developer or resident wish to purchase one, as the Council does not currently provide containers for refuse);
    - for details of container dimensions please see Figure 13, below.

### Residential development of 7 dwellings or more

- 10.9 Collection services for developments with 7 or more residential dwellings vary depending on the individual circumstances of the premises. For this type of development a kerbside collection is preferred, where possible. For external storage requirements, the guidance for residential development of 6 or fewer units should be used.
- 10.10 Where communal facilities are required (i.e. the dwellings will share central recycling and refuse bins), the following steps should be followed:
- 10.11 The table below can be used to calculate the total volume of all waste and recycling generated in a week:

Size of household	Number in development	Projected Weekly Waste per household	Waste produced from all households
-------------------	-----------------------	--------------------------------------	------------------------------------

Studio / one bedroom	A	100 litres	A x 100 = W litres
Two bedroom	B	170 litres	B x 170 = X litres
Three bedroom	C	240 litres	C x 240 = Y litres
Total Weekly Waste Arising			W+X+Y = Z litres

- 10.12 If there are more than six households in a block of flats we recommend the use of bulk bins. The standard Eurobins we use have a capacity of 1,100 or 1,280 litres. The minimum required can be calculated as below:

$$\text{Number of bulk bins required} = \frac{\text{(Z) litres (from Table 1)}}{1,100 \text{ litres (volume of bulk bin)}}$$

- 10.13 Provision of bins should at least be split equally between refuse and recycling including provision for food waste – e.g. if a building requires 4.5 x 1,100l bins, 2 should be for refuse and 2 for dry recycling, plus a 660l bin for food waste.

#### Space requirements

- 10.14 Internal storage: Bulk bins must be placed on smooth impervious material that is 100 mm thick to withstand the weight. If multiple bins are needed they are better kept in an enclosure. This discourages nonresidents from using the bins and also improves the aesthetics of the development. The dimensions of bulk bins are given in the table below.

**Figure 13. Storage containers and dimensions**

Container Type	Use	External dimensions mm (H x W x D)
55l green box	Storage of mixed dry recycling by households without space for a wheelie bin. Can be stored internally or externally, collected from the kerbside.	350 x 390 x 585
45l reusable green bag	Storage of mixed dry recycling by households without space for a wheelie bin. Can be stored internally or externally, collected from the kerbside	350 x 300 x 450
7l kitchen caddy	Internal storage of food waste. Contents are then transferred to a larger outdoor caddy or communal food waste bin.	252 x 252 x 229



23l kitchen caddy	External storage and collection of food waste by households with a kerbside collection	405 x 320 x 400
90l white sack	Seasonal external storage of compostable garden waste	450 x 450 x 450
140l wheelie bin	External storage and collection of mixed dry recycling by households with a kerbside collection.	1070 x 580 x 550
240l wheelie bin	External storage and collection of mixed dry recycling by households with a kerbside collection	1070 x 580 x 740
500l Eurobin	Communal external storage and collection of food recycling for households with communal collections	1145 x 1305 x 745
1100l Eurobin	Communal external storage and collection of mixed dry recycling and refuse for households with communal collections	1370 x 1260 x 990

(NB: This list, including the bin dimensions, is subject to change. It is only to be used for preliminary design purposes)

- 10.15 Residents should not be expected to carry their waste more than 30 metres in the horizontal distance from their front door to the bin store.
- 10.16 The enclosure or chamber should be large enough to allow clearance of 150 mm between each bin and the walls.
- 10.17 There should be space in front of the bins to allow residents to easily access the bins when depositing waste.
- 10.18 If multiple bins are used then there should be sufficient space to rotate the bins in between collections.
- 10.19 The walls should be made from an impervious, non-combustible material that ideally has a fire resistance of one hour when tested to BS 476-21.
- 10.20 If a gate or door is added to the enclosure or chamber it should be metal, hardwood or softwood clad with metal. Ideally it should have a fire resistance of 30 minutes when tested to BS 476-22. The door frame should allow clearance of 150 mm either side of the bin, when it is being pulled out for collection. The door frame should be rebated into the reveals of the opening. There should be a latch or clasp to hold the door open while the collection process takes place.
- 10.21 Arrangements should be made for the cleansing of the bin stores with water and disinfectant. A hose union tap should be installed for the water supply. Drainage should be by means of trapped gully connected to the foul sewer. The floor of the bin store area should have a suitable fall (no greater than 1:20) towards the drainage points.
- 10.22 If the chambers are inside the building they should have a light. The lighting should be a sealed bulkhead fitting ( housings rated to IP65 in BS EN 60529:1992).

- 10.23 Internal bin chambers should have appropriate passive ventilators to allow air flow and prevent unpleasant odours. The ventilation must be fly and vermin proofed and near to either the roof or floor, but away from the windows of dwellings.

#### Access for collections

- 10.24 Collectors should not have to cart a bulk bin more than 10 metres from the point of storage to the collection vehicle.
- 10.25 The gradient of any path that the bulk bins have to be moved on should ideally be no more than 1:20, with a width of at least 2 metres, and the surface should be smooth.
- 10.26 If the storage area is raised above the area where the collection vehicle parks, then a dropped kerb is needed to safely move the bin to level of the collection vehicle.
- 10.27 The roadway the vehicle parks on should be able to accommodate the weight and size of a 26 tonne vehicle.

#### Non-residential and commercial buildings

- 10.28 Occupiers of commercial premises are legally obliged to make an arrangement with either the Council or a licensed waste carrier for the collection of the waste produced from the premises.
- 10.29 The volume of waste generated and thus the number and type of containers that a commercial development requires is ultimately dependent on the use of the building. Further information can be found on the Council's website: <http://camden.gov.uk/ccm/content/environment/waste-andrecycling/commercial-waste/duty-of-care.en>
- 10.30 Where an extension or change of use to an existing property is proposed, this may result in the removal of existing container storage areas, typically, to the rear of a property. This may be acceptable provided that an alternative storage area is designated as part of the proposed development, in line with this guidance. For external storage requirements, Figure 14: External Storage Requirements should be used.

#### Space requirements

- Internal collection and storage points should always be considered for all types of waste to maximise the amount of recyclable material.
- External storage must be provided in most cases. As a guide, approximately one cubic metre storage space is required for every 300-500sq m of commercial space (includes both recyclable and nonrecyclable waste). Storage space must be designed to accommodate bins to hold this amount of waste, separated, and should be designed in consultation with the waste collection contractor.

- Waste and recyclables from residential and commercial components of a development must be stored separately, but they should be stored using the same container type to facilitate ease of collection.
- For a summary of external waste storage requirements see Figure 14

#### RESTAURANTS AND FOOD WASTE

Special consideration must be given to the location and nature of external storage areas. The volume of waste generated is generally high and has a high biodegradable content, therefore can potentially cause nuisance from odour, visual blight, and through attraction of vermin and scavengers. Storage of such waste should be in solid receptacles which ameliorate negative environmental impacts

Since 1st January 2006 developments that generate food waste have had to comply with the requirements of the Animal By-Products Regulations 2005. The Regulations place controls on the collection, handling, transport, storage and disposal of animal by-products, which includes catering waste. This may have implications for the design of the building and the waste containers required. Further information on The Animal By-Products Regulations 2005 should be sought from DEFRA – [www.defra.gov.uk/animalh/by-prods/default.htm](http://www.defra.gov.uk/animalh/by-prods/default.htm)

#### Location Requirements

- 10.31 The table below summarises the key external storage requirements. In particular, the first six features apply to all developments regardless of size and type of units.

Figure 14. External storage requirements

	External storage area features:	Less than 6 residential units	7 or more residential units	Nonresidential (commercial) Development
1	Should not be located near ground storey windows. They should be located within 10 metres of an external access.	✓	✓	✓
2	External storage areas and collection points must be as close as possible to, and preferably within 10 metres of, a place suitable for a collection vehicle to stop.	✓	✓	✓
3	Storage facilities must be at or near street level, and should be accessible via appropriately sized and graded ramps to allow bins to be wheeled to and from the collection point easily.	✓	✓	✓
4	Must be safe for users by being well lit and visible from public vantage points and nearby dwellings / tenancies.	✓	✓	✓

5	Should be unroofed, unless they are fully enclosed and secured (ideally inaccessible to animals).	✓	✓	✓
6	Should be accessible for collection purposes and not impede pedestrian or vehicular access on public thoroughfares or to and from buildings.	✓	✓	✓
7	Should be located as close to the front property boundary as possible, preferably behind the front boundary wall, without detracting from the street scene.		✓	
8	Consideration should be given to the: <ul style="list-style-type: none"> <li>• allocation of additional external storage space in the future, e.g. additional bins,</li> <li>• composting facilities - in residential development with a garden or landscaping,</li> <li>• provision of onsite storage for bulky waste (i.e. furniture) items and potential opportunities for re-use of these items.</li> </ul>		✓	
9	Should be in an enclosed chamber that can be accessed from outside the building.			✓
10	Large developments in areas that are deficient in recycling banks (“bring”) facilities will be expected to incorporate these facilities onsite for use by the general public - must be located in secure and easily accessible communal areas,		✓	✓

#### **Additional Requirements**

- 10.32 Applicants must provide details of storage for waste and recyclables in a proposed development as part of their application. These should be shown on the plans or in the application documents, where possible, and will form part of the approval
- 10.33 For schemes that create 7 or more dwellings, or includes a nonresidential component, the applicant must consult Camden’s Planning Department prior to making an application to determine the best means of storage and collection for the development. A statement describing the proposed waste storage and collection arrangements should be provided with the application.
- 10.34 For large proposals, or for proposals with complex waste separation or collection arrangements, a management plan might be required as a condition of approval.
- 10.35 Consideration should also be given to materials and finishes, and lighting of waste enclosures, to ensure that they are safe and secure, and do not present a fire hazard. These are dealt with in the Building Regulations.

**Further information**

Camden Street Environment Services	<p>Applicants are advised to contact Camden Street Environment Services in the first instant prior to making an application to determine the appropriate means of storage and collection required for a proposal</p> <p>Address:  Roy Shaw Centre  3-5 Cressy Road London  NW3 2ND 020 7974  6914/5  <a href="http://www.camden.gov.uk/waste">www.camden.gov.uk/waste</a></p>
Waste storage requirements	<p>Waste Storage : A Guide for Developers of Commercial and Residential Premises in the London Borough of Camden, Camden Street Environment Services</p> <p>BS 5906 2005 Waste management in buildings – Code of practice, British Standards</p>
Assistance with the identification of an appropriate company to deal with recyclable waste from the proposed development	<p>Waste recycling <a href="http://www.wasterecycling.org.uk">www.wasterecycling.org.uk</a></p> <p>For free environmental guidance for small and medium-sized enterprises, see Environment Agency (NetRegs) <a href="http://www.environment-agency.gov.uk/netregs/default.aspx">www.environment-agency.gov.uk/netregs/default.aspx</a></p>

# 11 Building services equipment

## KEY MESSAGES

Building services equipment should:

- be incorporated into development;
- have a minimal impact on the environment; and
- Should not harm occupant or neighbour amenity.

- 11.1 Building services equipment, whether it is used for heating and cooling, communications, power, plumbing, ventilation, access or security, if not considered appropriately, can cause significant visual blight and nuisance for neighbours.
- 11.2 The purpose of this guidance is to ensure that necessary building services equipment can be incorporated into development, while having minimal impacts on their environment. Impacts that are likely to require minimisation or mitigation include visual blight, light nuisance, noise nuisance and vibration, odour, and other environmental pollutants or nuisance.
- 11.3 This guidance relates to Camden Development Policy DP24 Securing high quality design, DP26 Managing the impact of development on occupiers and neighbours and DP28 Noise and vibration.
- 11.4 This guidance does not specifically apply to renewable energy installations, or telecommunications as they are considered in other guidance but principles may be the same. For further information see CPG3 Sustainability (Energy efficiency: existing buildings, Energy efficiency: new buildings and Renewable energy chapters) and PPG8: Telecommunications.

## How should building services equipment be treated?

### Design considerations

- 11.5 In new development, all building services equipment:
- must be integrated within the building or development structure;
  - must be incorporated into the external building design where, because of its nature, it cannot be integrated within the building; and
  - should not be a dominant feature of the building.
- 11.6 In refurbished development, plant and machinery should be accommodated within the building structure, or incorporated into the design of external modifications.
- 11.7 Other design considerations for building services equipment include:
- screening or other techniques to minimise the impacts of plant, machinery and ducting must, in themselves, not cause visual blight;

- plant and machinery on roofs should not be visible from the street, public vantage points or from immediately adjacent buildings;
- the design and materials used for plant, machinery and ducting, as well as for ancillary structures such as screening, where located on the exterior of the building, must be consistent with those of the building; and
- where possible, plant and machinery should be designed in such a way that does not lead to issues of safety and security.

### **Amenity**

- 11.8 Where ducting, plant or machinery are required on the outside of a building they must not obscure access to daylight and sunlight, or provide any nuisance for occupants of the development or adjacent buildings.
- 11.9 Plant and machinery with moving parts must be separated or insulated from occupants and neighbours who are likely to be sensitive to noise disturbance. Techniques to achieve this separation include the use of flexible ducting, or resilient mountings for structure-borne plant and machinery.
- 11.10 Where mechanical or passive ventilation is required to remove odour emissions, the release point for odours must be located above the roofline of the building and, where possible, adjacent buildings.

### **Sustainability**

- 11.11 Plant and machinery, particularly where located on roofs, must not preclude the installation of required onsite renewable energy facilities in the proposal. Consideration must also be given to the possibility of future renewable energy installations.

### **Conservation areas and listed buildings**

- 11.12 Special consideration should be given to the installation of plant, machinery and ducting on listed buildings and in conservation areas. Fewer external solutions are likely to be appropriate in these locations. Installations must be in keeping with the design and materials of the building. Listed building consent is likely to be required for works to a listed building.

### **Other considerations**

- Access to plant and machinery must be provided to allow for convenient and safe servicing and replacement of installations;
- Machinery must be properly installed and maintained to ensure that impacts are properly mitigated and the situation does not deteriorate over time with continued operation.
- Plant and machinery should be located as close as possible to their end use, e.g. boilers should be located near to the hot water or heating users, to minimise use of ducting materials, loss of resource and visual blight.
- Disused plant, machinery and ducting must be removed from the exterior of buildings before replacements can be installed. Only in exceptional circumstances will these be allowed to remain.

## 12 Artworks, statues and memorials

### KEY MESSAGES

Applications for artworks, statues or memorials are only likely to be acceptable if they:

- meet the requirements of Camden's corporate guidance 'New statues, memorials and artworks in parks, open spaces and the public highway in Camden' and
- protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.

It may be inappropriate to site any artworks and memorials in some locations for contextual or historic reasons.

### Background

- 12.1 Camden is receiving an increasing number of applications for artworks, statues and memorials and there is a limited and reducing supply of suitable locations in the public realm and parks and gardens to accommodate new works. This guidance sets out the minimum requirements that Camden expects for applications for public art and all commemorative works including statues and memorials. **Prior to submitting a planning application**
- 12.2 Before applying for planning permission you should ensure your proposal meets the requirements of the corporate guidance, you should secure all the relevant permissions, and arrange sufficient funding including for ongoing maintenance. Details of this should be provided as part of your planning application.

### Corporate guidance

- 12.3 LB Camden has prepared corporate guidance entitled 'New statues, memorials and artworks in parks, open spaces and the public highway in Camden'. The guidance sets out what the council expects for artworks and memorials in the borough. The corporate guidance includes the following principles:
- Site specificity and context: The subject of an artwork, statue or memorial must have a clear historical or conceptual connection to the proposed location.
  - 20 year principle: At least 20 years after the death of an individual or the date of the event should elapse before an artwork, statue or memorial is erected in commemoration.
  - Protected areas: Artworks, statues and memorials should not be sited in spaces which already have a high concentration of other artworks, statues or memorials. LB Camden Parks and Open Spaces have surveyed key artworks, statues and memorials across the borough and identified areas where any further development of artworks, statues and memorials is unlikely to be appropriate. These have been identified in site survey documents for Council owned or managed land and also through mapping of the density (saturation) of artworks, statues and memorials across the entire borough. We are unlikely to grant permission for new artworks, statues or memorials where identified as inappropriate in site surveys or in areas mapped as having a high saturated or existing works.



- Quality: Statues and memorials must be of the highest quality, from an artist who has been selected through a robust and transparent selection process.

12.4 The Council will not grant planning permission for artworks, statues and memorials which are not generally in line with the corporate guidance.

### **Permissions and other legislation**

12.5 Prior to applying for planning permission you should you have all relevant permissions includes permission from the land owner and from leaseholders and managers of the land.

12.6 You should have regard to other legislation including:

- The Highways Act 1980: works affecting the public highway will require consent of the highway authority.
- Public Statues (Metropolis) Act 1854: Section 5 requires consent of the Secretary of State for Culture, Media and Sport, although this is generally provided as a matter of course if the scheme receives planning permission.
- The London Squares Preservation Act 1931 and Public Statues Act 1884 may be relevant to your proposal.

### **Funding**

12.7 You should ensure you have made arrangements for the ongoing maintenance of an artwork, statue or memorial. If the artwork, statue or memorial is on Council owned or managed land you are likely to be required to arrange funding to provide to the Council for maintenance of the work in perpetuity. If the work is on private land you are likely to have to be required to provide a maintenance plan as part of planning permission. You may be required to enter a legal agreement (such as s106 Agreement) to secure these measures.

### **Planning Permission**

#### **When is planning permission required?**

12.8 Depending on the size and location, construction or installation of an artwork or memorial may be constitute development under the Town and Country Planning Act 1990 and therefore require planning permission. Artworks or memorials which are outside or will materially alter the appearance of an area or building will generally require planning permission. Any artworks or memorials on the interior of a building and which do not materially alter the outside appearance of the building are unlikely to require planning permission. If an artwork or memorial forms part of a larger development it should form part of the planning application for the entire scheme. Listed building consent will be required for any work to which affects the special architectural or historic character of a listed building or structure including internal or external alterations.

## **Assessment of applications for artworks and memorials**

- 12.9 Applications for planning permission for memorials and artworks will be assessed against the National Planning Policy Framework, Council's Local Development Framework (LDF) Core Strategy and Development Policies planning policy documents, the relevant Conservation Area Appraisal and Management Plan (if in a Conservation Area), and Camden Planning Guidance.

### **High quality design**

- 12.10 Core Strategy CS14 'Promoting high quality places and conserving our heritage' requires development to be of a high standard of design and respect local character. CS14 promotes high quality landscaping and works to streets and public spaces.
- 12.11 Core Strategy CS15 'Protecting and improving our parks and open spaces and encouraging biodiversity' states that Camden will protect and improve its parks and open spaces.
- 12.12 Development Policy DP24 'Securing high quality design' requires all development to be of the highest standard of design, and expects developments to consider the character, setting, context, form and scale of neighbouring buildings, the quality of materials used, natural features and landscaping. The policy encourages outstanding design in contemporary or traditional styles. The policy requires development to consider existing rhythms, symmetries and uniformities in the townscape, the compatibility of materials and their texture, tone and colour, the contribution of a design to views and vistas, and the wider historic environment and features.
- 12.13 This Camden Planning Guidance document sets out further design considerations, refer to page 7 for general guidance on design and refer to page 43 for guidance on landscape design and trees.

### **Conservation of heritage**

- 12.14 Core Strategy CS14 'Promoting high quality places and conserving our heritage' requires development to respect local character and requires development to preserve and enhance heritage assets including historic parks and gardens.
- 12.15 Development Policy DP25 'Conserving Camden's heritage' requires development take account of conservation area statements, appraisals and management plans. Development will only be permitted within conservation areas which preserves and enhances the character and appearance of that area. The policy requires the preservation of trees and garden spaces which contribute to the character of the conservation area and protects parks and gardens of Special Historic Interest and London Squares.
- 12.16 If the artwork of memorial is in a Conservation Area you must refer to the relevant Conservation Area Appraisal and Management Plan which are available on [www.camden.gov.uk](http://www.camden.gov.uk).

12.17 This Camden Planning Guidance document sets out further heritage considerations, refer to page 13.

### **Crime prevention through design**

12.18 Core Strategy CS17 'Making Camden a safer place' requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security and promotes safer streets and public areas. This may include through design, lighting and management.

12.19 This Camden Planning Guidance document sets out further heritage considerations, refer to page 77.

### **Further considerations for artworks and memorials**

12.20 In line with the LDF Core Strategy and Development Policies as summarised above new artworks and memorials will only be permitted where they preserve and enhance the character of the local area, historic environment and heritage assets. Further planning considerations of particular relevant to artworks, statues and memorials are set out below.

### **Landscape design and over-saturation**

12.21 New artworks or memorials should only be sited where they contribute to a harmonious and balanced landscape design. Many of the public spaces in Camden particularly open spaces in Central London have limited opportunities for siting of new artworks or memorials. The existing and historic design of spaces must be respected and new structures should not be imposed where they would not complement or improve this existing landscape design. New artworks or memorials are unlikely to be acceptable in locations where there are a number of existing artworks or memorials. Siting of artworks and memorials should also take consideration of the corporate priority to keep the spaces free of clutter to allow unimpeded pedestrian access and for aesthetic considerations.

### **Historic and thematic context**

12.22 Artworks and memorials will only be permitted where appropriate in terms of the history, context and purpose of a site. The history or context of space may make siting of artworks or memorials inappropriate even when it may be acceptable from design or aesthetic considerations. If a location (for example a garden or square) has been traditionally free from artworks or memorials the introduction of a piece can shift the emphasis and meaning of that space from being an open space in its own right to that of a landscaped setting for an artwork, statue or memorial. Due to the impact they have in changing the character of a space artworks, statues or memorials which form the centrepiece or focus to a space, particularly higher profile spaces such as Central London Squares are unlikely to be acceptable in all but exceptional circumstances (for example where there is overwhelming public support for a person or event of national importance). In line with the National Planning Policy Framework great weight will be given to the conservation of heritage assets and development leading to substantial harm to the significance of a designated heritage asset will be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

## **Temporary artworks and memorials**

- 12.23 Temporary memorials provide a focus for community commemoration while being significantly less costly and time consuming to establish. Planning permission may still be required for temporary structures and you should contact to the Council at an early stage for advice.

## Index

Advertisements .....	77	Recycling .....	93
Advertisements (shopfronts) .....	67	Refuse .....	93
Alarms .....	74	Roller grilles .....	<i>See</i> Grilles
Anti-social behaviour .....	83	Roof alterations and extensions ..	39
Anti-terrorism .....	90	Roof dormers .....	41
Article 4 directions .....	18	Roof lights .....	45
ATMs .....	<i>See</i> Cash Machines	Roofs .....	39
Awnings .....	68	Section 211 .....	52
Balconies .....	45	Shopfronts.....	61
Banner advertisements .....	80	Shroud advertisements .....	80
Blinds .....	68	Shutters .....	72
Building services equipment ....	101,	Side extensions .....	<i>See</i>
<i>See</i> Services		Extensions Signs (general)	
Canopies .....	68	.....	77
Cash machine boxes .....	88	Signs	
Cash machines .....	74	(shopfronts) .....	67
Community Safety .....	85	Solar	
Conservation area statements ....	19	panels .....	46
Conservation areas .....	16	Street furniture .....	88
Conservatories .....	35	Tall buildings .....	12
Crime Prevention .....	84	Telephone boxes .....	88
Cross overs.....	55	Terraces .....	45
Design and Access Statements ..	13	Tree preservation orders .....	52
Doors .....	31	Trees .....	49
Dormers .....	41	Trees in Conservation Areas .....	52
Extensions .....	29	Walls .....	57
Extensions (rear) .....	33	Window Displays .....	64
Extensions (side) .....	34	Windows .....	30
External alterations .....	30		
External pipework .....	32		
Fascias .....	65		
Fences .....	57		
Front gardens .....	<i>See</i> Gardens		
Gardens .....	54		
Gardens (front).....	54		
Gardens (rear, development in) ..	36		
Gating .....	85		
Green roofs (in roof design) .....	46		
Grilles (shopfront) .....	73		
Heritage .....	15		
Hoardings .....	79		
Landscape design .....	49		
Licensed premises .....	87		
Lighting .....	60		
Listed Buildings .....	20		
Mansard Roofs .....	42		
Paving of front gardens .....	55		
Railings .....	57		
Rear extensions .....	<i>See</i> Extensions		
Rear gardens .....	<i>See</i> Gardens		

Camden Planning Guidance

# Housing

London Borough of Camden

CPG 2



May 2016 (as amended March 2019)



## **CPG2 Housing**

1	Introduction.....	5
2	Affordable housing and housing in mixed use development ....	9







# 1 Introduction

## What is Camden Planning Guidance?

- 1.1 We have updated this Camden Planning Guidance (CPG) to support the policies in the Camden Local Plan 2017. This guidance forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions.
  - 1.2 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.
  - 1.3 CPG2 Housing has been subject to five updates:
    - 4 September 2013 following statutory consultation in November to December 2012;
    - 17 July 2015 following statutory consultation in March to April 2015;
    - 6 May 2016 following statutory consultation in February to April 2016 (the updated document is referred to as Housing CPG 2016); and
    - 26 March 2018 following statutory consultation in November 2017 to January 2018;
    - 15 March 2019 following statutory consultation in November 2018 to January 2019.
- Details on these updates and the consultation process are available at [camden.gov.uk/cpg](http://camden.gov.uk/cpg).
- 1.4 The fourth update followed the adoption of the Camden Local Plan in 3 July 2017. This update deleted some parts of the Housing CPG 2016, and replaced them with a standalone document 'Interim Housing CPG'. The Interim Housing CPG will be incorporated into a new set of Camden Planning Guidance documents as part of a wider review expected to take place in 2019.
  - 1.5 The fifth update inserted further new sections in the Interim Housing CPG, replacing section 6 of this document, and section 6 of CPG8 Planning obligations 2015. The update also amended the introductions to this document and the Interim Housing CPG to reflect the changes that have been made.
  - 1.6 We have added notes throughout this document to indicate paragraphs that have been deleted or replaced by the Interim Housing CPG.
  - 1.7 The Interim Housing CPG has been produced because:
    - there are a number of policy changes emerging at regional and national level that would quickly have overtaken and superseded a full review of CPG2 if it had taken place in autumn 2017;

- emerging policy changes include the Government's revised National Planning Policy Framework – including new affordable housing definitions; but
  - some elements of CPG2 needed to be replaced quickly to guide implementation of new policies in the Camden Local Plan 2017 that are substantially different from earlier policies.
- 1.8 The updated elements of the guidance are consistent with the Camden Local Plan 2017. The Camden Local Plan 2017 has greater statutory weight than Housing CPG 2016, and where there is any apparent conflict between Housing CPG 2016 and the Local Plan, the Local Plan will prevail.
- 1.9 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 the Camden Local Plan 2017.

### **What does this guidance cover?**

- 1.10 This document provides specific guidance on:
- Affordable housing and housing in mixed use development – see also the standalone Interim Housing CPG (information on the split between the documents is provided in paragraph 1.12 of this guidance)
- 1.11 The Interim Housing CPG provides specific guidance on:
- other aspects of Affordable housing and housing in mixed use development (information on the split between the documents is provided in paragraph 1.12 of this guidance)
  - Payment in lieu rates and planning obligations
  - Residential development standards (including accessibility)
  - Development involving a net loss of homes
- The Council has also adopted a separate Student Housing CPG.
- 1.12 The guidance on “Affordable housing and housing in mixed use development” is divided into a number of subsections. Each subsection deals with a different question relating the requirements of Policies H2 and H4 of the Camden Local Plan 2017. They are split between this document and the standalone Interim Housing CPG as follows:
- what is affordable housing? - see the Interim Housing CPG
  - which developments should include self-contained housing as part of a mix of uses? – see the Interim Housing CPG
  - which developments should contribute to affordable housing? – see the Interim Housing CPG

- how should affordable housing be provided? – see the interim guidance
- how much affordable housing do we expect? – see the Interim Housing CPG
- how much housing and affordable housing do we expect as part of a mix of uses – see the Interim Housing CPG
- what types of affordable housing do we expect? – see the Interim Housing CPG
- how will the Council consider financial viability? – included in this document except for the subsection 'Transparency and confidential viability information', which is in the Interim Housing CPG
- can the market housing and affordable housing be provided off-site? – included in this document except for the subsections related to 'Payments in Lieu', which are in the Interim Housing CPG

1.13 Taken together, this document and the Interim Housing CPG highlight the Council's requirements and guidelines which support the Camden Local Plan 2017 policies:

- G1 – Delivery and location of growth
- H1 - Maximising housing supply
- H2 - Maximising the supply of self-contained housing from mixed use schemes
- H3 - Protecting existing homes
- H4 - Maximising the supply of affordable housing
- H5 - Protecting and improving affordable housing
- H6 – Housing choice and mix
- H7 - Large and small homes
- H8 - Housing for older people, homeless people and vulnerable people
- H9- Student housing
- H10 - Housing with shared facilities
- A1 - Managing the impact of development
- D1 - Design



## 2 Affordable housing and housing in mixed use development

*This sub-section (Key Messages and paragraphs 2.1 to 2.5) has been replaced by Interim Housing CPG (Key Messages and paragraphs IH2.1 to IH2.5).*

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

*This sub-section (paragraphs 2.6 to 2.11) has been replaced by Interim Housing CPG (paragraphs IH2.6 to IH2.8).*

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

*This sub-section (paragraphs 2.12 to 2.21) has been replaced by Interim Housing CPG (paragraphs IH2.9 to IH2.17).*

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

*This sub-section (paragraphs 2.22 to 2.31) has been replaced by Interim Housing CPG (paragraphs IH2.23 to 2.33).*

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

*This sub-section (paragraphs 2.32 to 2.41) has been replaced by Interim Housing CPG (paragraphs IH2.37 to IH2.54).*

### **What types of affordable housing do we expect?**

*This sub-section (paragraphs 2.42 to 2.59) has been replaced by Interim Housing CPG (paragraphs IH2.70 to IH2.89).*

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

*This sub-section of CPG2 (paragraphs 2.60 to 2.64) has been deleted. A new section in Interim Housing CPG sets out how affordable housing should be provided (paragraphs IH2.34 to IH2.36).*

## How will the Council consider financial viability?

### Policy background to financial viability appraisal

- 2.65 Our Core Strategy and Development Policies outline a number of Council aims and commitments relating to housing and mixed-use development that provide a framework for considering financial viability:
- housing is the priority land-use of the Local Development Framework
  - we will seek to **maximise the supply of additional housing**, and
  - we will seek the **maximum reasonable amount of affordable housing** on each site, taking into account specific circumstances including the financial viability of the development
  - to maximise overall housing supply, we will implement policies flexibly in response to economic uncertainty
  - to ensure that housing development is viable, we may consider varying the proportion and/ or type of market and affordable housing in a development, or consider off-site solutions where necessary (see the sub-section '**Can the affordable housing be provided off-site?**')
- 2.66 Where a development provides an addition of 200 sq m or more (gross) of non-residential floorspace in the Central London Area or the larger town centres, applicants will need to demonstrate that the development is providing an appropriate contribution to the supply of housing. Where a development has capacity for 10 or more additional dwellings, applicants will need to demonstrate that the development is providing the maximum reasonable amount of affordable housing. In most cases, the applicant will be required to submit a financial viability appraisal to justify the proportions of housing and affordable housing proposed. Where viability will be a key factor influencing the content of development and the extent of planning obligations the Council strongly encourages discussion of viability at the pre-application stage – see paragraphs 2.71 to 2.74 below.
- 2.67 There is a limited amount of government guidance on how development viability should be considered in decision-taking, primarily paragraph 173 of the NPPF and National Planning Practice Guidance (NPPG) ID10 paragraphs 1 to 4 and 16 to 24. Paragraph 2 indicates that there is no single approach to viability assessment, and there is a range of sector led guidance available. The GLA has developed a methodology for financial viability appraisal in London in the form of an annually reviewed Development Control/ Development Appraisal Toolkit, and this is accompanied by detailed Guidance Notes. As well as providing information on the operation of the Toolkit, the Guidance Notes provide more general advice on viability appraisal, and will be used to inform the Council's approach.

### What is financial viability appraisal?

- 2.68 The NPPF advises that a viable development should provide competitive returns to a willing landowner and a willing developer. A financial viability

appraisal can be used to explore whether the NPPF test of viability is met by assessing the value of a development, subtracting an assessment of development costs and a competitive developer return, and establishing the remaining land value available to provide a return to the landowner.

- 2.69 A financial viability appraisal is a balance sheet for the development which enables all scheme costs and revenues to be taken fully into account. The Council expects viability appraisals to generate a 'residual land value'. The residual land value is the sum available to fund land purchase once all scheme revenues and costs have been taken into account, including provision of affordable housing, other planning obligations and the return to the developer but excluding any price already paid for land acquisition. Figure 4 sets out some of the typical inputs used in viability appraisal.
- 2.70 Schemes are considered to be viable where the residual land value (taking into account the provision of affordable housing and other planning obligations) matches or exceeds a benchmark land value for the site. The benchmark land value represents the competitive price at which a reasonable land owner would be willing to sell their land for development. This value will depend on the particular circumstances of the site (eg whether the land is vacant or occupied, the condition and marketability of any buildings) and the options available. The Council will seek to agree the benchmark value with the applicant, with the assistance of advice from any appointed independent verifier.

**Figure 4. Typical inputs to financial viability appraisal**

<b>Cost inputs</b>	<b>Revenue inputs</b>
demolition and build costs (supported by an elemental cost plan)	sales values
professional fees	payment by a housing association for transfer of affordable housing
marketing fees	public subsidy for affordable housing (if not included above)
development finance costs	capitalised rents and yield (for non-residential floorspace and any proposed private rented residential floorspace)
land finance and holding costs (for the period covering land acquisition/ scheme preparation, planning application and development)	capitalised ground rental income
planning obligations other than affordable housing	
developer's return (non-residential floorspace and market housing)	
contractor's return (affordable housing)	

#### **Before a viability appraisal is submitted**

- 2.71 We strongly advise applicants to discuss the general parameters of individual viability appraisals with us before they are prepared. Early discussions can ensure that the appraisal provides the evidence needed



to assess the application and help to avoid delays after the application is submitted. Discussions should include the scope of viability appraisal, appropriate measures of land value, and the value of affordable housing. Submission of a draft viability appraisal may be appropriate.

- 2.72 Discussions may include whether viability appraisal of the proposed development should be accompanied by viability appraisal of alternative options such as:
- a development that meets our full expectations for housing and affordable housing contributions but is not viable
  - a development that partly meets our expectations for housing and affordable housing contributions
  - development for an alternative use that is lawful (having regard to the most recent lawful use and any applicable development orders), or has a current planning consent or has been agreed in principle as a site allocation in an adopted local plan or development plan document
  - an alternative development falling below the relevant Development Policy thresholds (200 sq m in DP1 and 1,000 sq m in DP3)
  - a development above the thresholds that makes no contribution to housing or affordable housing
  - an off-site contribution to housing or affordable housing
- 2.73 At the pre-application stage developers are also strongly encouraged to discuss provision of affordable housing with Registered Providers and the Council's Housing Commissioning and Partnerships Team to inform discussion of likely rents, suitable intermediate housing models and capital values – see also paragraphs IH2.34 to IH2.36 of the Interim Housing CPG.
- 2.74 As indicated in our Development Policies document, in certain circumstances the Council will expect applicants to fund an independent verification of the financial viability appraisal. Where independent verification is likely to be required we will seek to discuss this at the pre-application stage, and we will seek a commitment from prospective applicants to provide the necessary funding. Independent verification will be required where the proportion or mix of housing/ affordable housing sought falls considerably short of the contributions anticipated by our Development Policies document. This independent verification will either be:
- commissioned directly by the Council in negotiation with the applicant; or
  - commissioned by the applicant from an independent body subject the Council agreeing the body and the specifications in advance.

#### **What form should the viability appraisal take?**

- 2.75 Several viability appraisal models are available, and the Council does not insist that a particular model is used. However, the model must generate a residual land value on the basis of an agreed developer

return (reflecting project scale, risk and loan requirements - see paragraph CPG22.79), and must be capable of being fully interrogated by the Council and any appointed independent verifier. The Council encourages the use of standard viability software. Where a bespoke model is produced for a particular scheme, the Council will expect a fully working electronic copy to be made available so that assumptions can be tested and varied by the Council and any appointed independent verifier. The Council will respect any intellectual copyright existing in a bespoke viability appraisal model and seek to agree with the applicant any arrangements needed to ensure copyright is protected.

- 2.76 The GLA publishes an Affordable Housing Development Control Toolkit (also known as the Three Dragons Toolkit), and most financial viability appraisals submitted to the Council are prepared using the Toolkit. The GLA Toolkit was designed specifically to assist negotiations between planning officers and developers. The Toolkit is reviewed annually.

*Paragraphs 2.77 and 2.78 have been replaced by a new sub-section in Interim Housing CPG, "Transparency and confidential viability information", paragraphs IH2.90 to IH2.94.*

#### IH2.90

The Camden Local Plan 2017 indicates that the Council supports transparency in decision making (see Local Plan paragraphs 3.64, 3.123 and 11.35). To that end we will:

- expect developers to provide information on viability through an open-book approach;
- seek the maximum reasonable disclosure of information in viability appraisals; and
- have regard to any elements that are commercially sensitive.

#### IH2.91

When an applicant submits viability information to the Council (including viability appraisals and all supporting material), the applicant should be aware that the Council favours transparency and public disclosure. There is a presumption in favour of disclosure, both built into the Environmental Information Regulations 2004 and the Council's own approach. Therefore the Council's standard policy is that all viability information will be released, whether proactively by routine publication or reactively ie in response to Environmental Information Regulations or Freedom of Information Act requests.

#### IH2.92

As noted there is a presumption in favour of disclosure therefore the Council will assess any case for confidentiality against that backdrop having regard to the adverse effect and the overriding public interest test in the Environmental Information Regulations and the Freedom of Information Act. Where, in the Council's opinion, the public interest falls on the side of releasing, the viability information will be published

notwithstanding the applicant's case for any specific element of the viability information to remain confidential.

#### IH2.93

As indicated in Local Plan paragraphs 3.64 and 3.123, the Council may seek independent verification of a viability appraisal where the proposed contribution to housing or affordable housing falls significantly short of requirements in Policies H2 and H4. The Council will also favour transparency and public disclosure in the verification process. As part of the decision-making process the Council will therefore generally release a report of the independent verification of the financial viability appraisal.

#### IH2.94

Where a further viability appraisal is submitted to the Council after the determination of a planning application (for example, in association with a deferred contingent contribution to housing or affordable housing), the Council will also favour transparency and public disclosure.

### **Inputs to financial viability appraisal**

#### 2.79

Viability appraisal of development requires the input of a range of information including build costs, developer's return (profit) and sales values. We will expect the inputs to the viability appraisal to meet the following requirements:

- all inputs should be backed up by relevant evidence;
- build costs should be backed up by BCIS data, quotations for building works, an elemental cost plan and detailed specification of the intended fit out, accompanied by any plans and drawings that have been used in formulation of the cost plan but do not otherwise form part of the planning application;
- land finance and holding costs should generally relate to a period starting from when a proposed development scheme is prepared for pre-application discussion with the Council, and continuing until development has been completed – they should not generally include periods when the site has not been in the control of the applicant, periods when the site has been generating a net revenue for the applicant from an existing use, periods when the applicant is not actively seeking to bring the site forward for development (eg if a site is held as part of a land bank), or delays and costs arising from failed appeals;
- land finance and holding cost should relate to an agreed benchmark value for the site where this differs from the price paid, as the price paid may overestimate what can be achieved on the site (see paragraphs 2.83 to 2.90);
- residential sales values should be backed up by analysed evidence of values achieved for comparable new-build homes of similar specification that have recently been completed nearby;

- affordable housing values should be based on evidence including a breakdown of assumptions regarding rent, full market value, initial equity sale, any staircasing assumptions, and anticipated rent charged on unsold equity, accompanied by capitalisation yield and calculations used to derive capital values, and should be backed up wherever practical by offers from Registered Providers that have a nominations agreement with the Council (see also paragraph 2.73);
- the appraisal should express the developer return on the market housing and commercial elements of a scheme as a percentage of their gross development value (GDV) (the capital value of all revenue derived from these elements), although this may be accompanied by other measures of developer return, such as a percentage of costs or internal rate of return (IRR);
- a lower percentage return should be assumed on the affordable housing reflecting the low risk associated with sale to a Registered Provider – this may be incorporated at a blended rate with return on the market housing and commercial elements;
- the percentage developer return should reflect the scale and the risks associated with the project, and the current requirements of lenders – the applicant should justify the percentage selected; and
- cash flows should be modelled wherever appropriate.

- 2.80 Sensitivity testing should be carried out and submitted as part of each financial viability appraisal to show the potential for the residual value to change significantly as a consequence of relatively small changes in the inputs. In particular, the impact of changes in sales value and build costs should be tested given the rapid increases in Camden house prices in recent years and emerging concerns about increases in build costs. Where a viability appraisal is independently verified, this should include verification of any sensitivity testing provided by the applicant, and provide additional sensitivity testing where the submitted appraisal is deficient.
- 2.81 The GLA's Development Control Toolkit provides benchmark values for some viability appraisal inputs. The guidance notes accompanying the GLA Development Control Toolkit are available free and provide more detailed information on which costs can appropriately be included in a viability appraisal. The Council will closely scrutinise development costs that exceed benchmark figures. Where independent verification of the appraisal is required, this should include confirmation that the inputs used are appropriate and are in accordance with relevant evidence.
- 2.82 The Council will not expect viability appraisal to include land value or acquisition cost as a fixed input. Valuations and acquisition costs generally reflect an assumption by the valuer about what can be developed on the site, including an assumption about the proportions of non-residential development, market housing and affordable housing that will be acceptable. If land value forms a fixed input to the appraisal, the process becomes circular, and the proportions of market housing and affordable housing that are viable will match the initial assumption of

the valuer. The Council's preferred measures of land value are given in Figure 5.

**Figure 5. Preferred measures of Land Value**

<b>Residual Land Value</b>	The value of a development once all scheme costs and revenues have been taken into account, including build costs, professional fees, developer's returns, provision of affordable housing and S106 contributions, but excluding site acquisition cost.
<b>Existing Use Value (or EUV)</b>	The value of a site in its lawful use. The Council will require evidence of the EUV, for example the value of rents paid by an existing occupier, or values achieved for sale of comparable sites continuing in the same use. The EUV should take account of revenue from the lawful use and any refurbishment or development costs that would be incurred to re-commence lawful use of a vacated site.
<b>Existing Use Value plus a premium (or EUV plus)</b>	The value of a site in its lawful use, as described above, but with an additional premium added as an incentive to the landowner to make the site available for development. Any premium is usually expressed as a percentage of EUV. The scale of any premium will depend on the particular circumstances of the site (eg whether the land is vacant or occupied, the condition and marketability of any buildings and the options available).

- 2.83 The residual land value should be an output of the viability appraisal. As indicated in paragraph 2.70, the Council will consider the development to be viable if the residual land value exceeds a benchmark land value that provides an incentive sufficient for the landowner to make the site available for development, taking into account the other options available. NPPG notes that these options may include the current use value or its value for a realistic alternative use that complies with planning policy
- 2.84 The Council's preferred measure of land value is existing use value, although other measures of land value may also be considered where they are appropriate. As stated in paragraph 2.70, we will seek to agree the benchmark value with the applicant, with the assistance of advice from any appointed independent verifier, and the starting point for these negotiations should be the Existing Use Value (EUV). In some circumstance (eg where a property is vacant and significant expenditure would be required to return it to use) a residual land value at or around EUV may be sufficient to incentivise development. In other circumstances (eg where a tenant has an unexpired lease and will need to relocate) a premium will be need to be added to the Existing Use Value (EUV plus) to incentivise release of the site.
- 2.85 The NPPG indicates that the incentive needed to bring forward the land will depend on the other options available. Consequently, the GLA Toolkit Guidance Notes state that the level of the premium will depend on site specific circumstances. Following from that, there is no normal or usual percentage to apply as a premium. The Guidance notes a number

of appeals in which Existing Use Value has been accepted as the starting point for benchmark land value. In some appeal cases, no premium was held to be required, but in others reasonable premiums were held to be 10% or 20% of EuV.

- 2.86 As a broad indication of how benchmark land values will be negotiated, the Council considers that reasonable premiums to apply in different circumstances could be as follows:
- 0-10% for old dilapidated buildings at the end of economic life;
  - up to 20% for a property in a viable existing use; and
  - up to 30% where development would need to fund relocation of an existing activity.
- 2.87 The NPPG also suggests that a realistic alternative use value (AUV) could be the basis for establishing a benchmark, and the Council may consider AUV alongside EUV where appropriate. An AUV is unlikely to be appropriate where it rests on assumptions about what would be granted planning consent, and requires costs and sales values or rents to be established for a hypothetical scheme that has not been worked-up in sufficient detail to be implemented. In accordance with the GLA Toolkit Guidance Notes, the Council therefore considers that the use of AUV as the basis for a benchmark is most likely to be appropriate where there is an alternative lawful use (having regard to the most recent lawful use and any applicable development orders), or there is already a planning consent in place with potential to be implemented, or there is a site allocation in a local plan (such as the Camden Site Allocations Document 2013) that gives sufficient detail for a realistic alternative proposal to be costed and valued.
- 2.88 The RICS guidance note "Financial Viability in Planning" suggests that the benchmark value should be based on the market value. There is no straightforward methodology for establishing market value, but the RICS guidance and NPPG both indicate the value should reflect development plan policies and all other planning considerations (notably planning obligations and any Community Infrastructure Levy charge). The RICS guidance also places a great deal of emphasis on the sale prices of comparable development sites, and notes that the 'risk-adjusted' value for a site without planning permission will be lower than the current market price for land with permission in place.
- 2.89 The RICS guidance notes that the actual price paid for a site may be used as evidence of market value where the site has recently been acquired/ disposed. However, the guidance warns that land values may change between the date of purchase and the viability appraisal, that developers may overpay due to an overestimate the acceptable development density or an underestimate the necessary planning obligations, and that site assembly may create a synergistic value greater than the components.
- 2.90 The Council considers that the market value and/ or the price paid for a site should be treated very cautiously in establishing a benchmark value

as developers will compete for sites by assuming a reduced level of planning obligations – and particularly affordable housing (see also paragraph 2.82). However, the Council may consider market value and/or price paid alongside Existing Market Value where market value and/or price paid is supported by clear evidence in the form of a viability appraisal demonstrating that market value has been assessed on the basis of full compliance with planning policy. Transactional evidence may be relevant where:

- it relates to comparable sites nearby;
- full and relevant details of the transactions are known and publically verifiable; and
- there is evidence that the stated land values allow for viable development proposals that fully comply with planning policy.

2.91 The purpose of the premium referred to in Figure 5 and paragraphs 2.84 to 2.86 is to provide an incentive to a landowner to release the site for development (as a vendor). A separate incentive is provided to the developer (as a purchaser) to carry out the development through a return based on the development process itself, including the land purchase. Once a land transaction has taken place, it is not appropriate for the developer to apply a further premium to the market value or the price paid.

2.92 An alternative use value (AUV) cannot provide a meaningful benchmark value unless it represents a financially viable development that would be an option for a landowner to consider. To be financially viable, the scheme would by definition provide competitive returns to a willing landowner and a willing developer. Consequently it should not be necessary for a further premium to be applied to an alternative use value.

### **Deferred affordable housing contributions**

2.93 London Plan policy 3.12 and Camden Development Policy DP3 indicate that the Council should seek the maximum reasonable amount of affordable housing in negotiations relating to residential and mixed-use sites. Many factors can have a significant impact on the maximum viable contribution to affordable housing, including changes to sales values, changes to build costs, changed specifications for materials and finishes and changes to the cost of finance. These factors can change quickly, and changes of a few percentage points can have a significant impact on the viability of a development. For example, house prices have risen sharply each year in Camden since the beginning of 2010. In the year to September 2010, prices had risen by 16.3%, with another 5.2% increase by September 2011, 7.2% higher by September 2012, 11.9% higher by September 2013 and 20.4% higher by September 2014 (source: Land Registry). Significant changes to viability are likely between the grant of planning permission and commencement, and between commencement and completion of the development.

- 2.94 The Council will therefore seek to negotiate deferred affordable housing contributions (similar to 'contingent obligations' referred to in London Plan policy 3.12) for developments where the provision of housing/ affordable housing falls significantly short of targets in Development Policies DP1 and DP3 due to financial viability, and there is a prospect of viability improving prior to completion. The deferred contribution is not a fixed amount, but is capped at the shortfall between the amount of additional housing/ affordable housing proposed and the Council's policy targets. The actual contribution is determined by a further viability appraisal undertaken on an open book basis at an agreed point after approval of the development but before the scheme is fully occupied.
- 2.95 A deferred contribution is only triggered if the further financial viability appraisal shows that there has been sufficient growth in viability. If the residual value of the development exceeds an agreed benchmark site value, then the excess is split equally between the developer and the Council unless the Council's share reaches the cap. Where the cap is reached, the contribution matches the shortfall between housing/ affordable housing provision and the Council's policy targets, and any further growth in the residual value relative to the benchmark site value will pass to the developer in full.
- 2.96 The Council has regard to the arrangements for 'contingent obligations' suggested by the London Plan and the Mayor's SPG. In the particular circumstances of Camden, the Council takes the following approach:
- re-appraisal of viability is expected after implementation when the development is substantially complete; and
  - re-appraisal of viability and deferred affordable housing contributions are sought as part of planning obligations for developments that proceed as a single phase, as well as for phased schemes.
- 2.97 Particular Camden circumstances justifying our approach are set below:
- Given the pace of recent house price rises in Camden (20.4% in the year up to Sept 2014), a re-appraisal of viability immediately prior to commencement would significantly underestimate the ability of the development to contribute to affordable housing, as the sales values for market housing will have increased considerably by the time of completion.
  - The pace of Camden house price rises means that even a short-term permissions (such as commencement within 12 months) and a requirement for review only if completion fails to take place within a modest period (such as 18 months from commencement) would allow a scheme to make a significantly smaller contribution to affordable housing than could be supported by the sales values finally achieved.
  - Given the type and scale of housing development in Camden, most market and affordable housing is delivered by schemes that proceed as a single phase. The pace of Camden house price rises means that if they are not subject to viability re-appraisal, such schemes will



make a significantly smaller contribution to affordable housing than could be supported by the sales values finally achieved.

- In a single phase scheme it is difficult to change the mix of market and affordable housing after implementation, so for single phase schemes in Camden deferred contributions will generally take the form of a payment-in-lieu.
- Many of Camden's development projects take advantage of the particular qualities of the borough to create unique homes at the higher end of the market – examples include developments in historic areas and developments creating views over Central London or Hampstead Heath. Given the uniqueness of such homes, it is exceedingly difficult to identify comparable developments or pertinent values achieved elsewhere, and consequently there is considerable uncertainty over the sales values likely to be achieved. Undertaking viability re-appraisal as close to the end of the development process as possible removes uncertainty as it allows recorded sales values to be used rather than predictions.
- Many of Camden's development projects (particularly those aimed at the higher end of the market) are designed to very high specifications in terms of materials, finishes and decor. High specifications give rise to high build costs that are difficult to confirm by reference to published sources such as BCIS, and are often engineered downwards during implementation. Undertaking viability re-appraisal as close to the end of the development process as possible removes uncertainty as it allows recorded build costs to be used rather than estimates.
- There are concerns that build costs in Camden could rise rapidly in coming years due to the unusually large number of construction projects taking place in Central London, and this uncertainty can also be removed by undertaking a later re-appraisal using recorded building costs.
- The Council's approach has been agreed as a planning obligation for more than ten developments in Camden. At the end of 2014, four of these had been completed, and had paid the full deferred affordable housing contribution, providing more than £13 million to fund additional affordable housing.

2.98 The Council will generally seek to secure the following arrangements for deferred affordable housing contributions in a S106 agreement:

- the deferred affordable housing contribution will take the form of a payment in-lieu to the Council's affordable housing fund
- the maximum contribution will be a payment-in-lieu based on the shortfall against housing/ affordable housing targets, calculated in accordance with Section 3 of the Interim Housing CPG
- full details of the agreed financial viability appraisal which guided determination of the application will be recorded

- the benchmark value for the site agreed in that appraisal (in accordance with paragraphs 2.70 and 2.83 to 2.92 of this guidance) will be recorded
- at a specific point during the development process we will require a further financial viability appraisal produced on an open book basis – generally this will be either at practical completion, or when a specified number of homes in the development have been sold but there are sufficient unsold homes for sales proceeds to fund the deferred contribution
- the developer will fund an independent verification of the further financial viability appraisal (as indicated in paragraph 2.74 of this guidance)
- following independent verification, the agreed benchmark value will be subtracted from the residual value given in the further financial viability assessment – this calculation will give a negative value or zero (a deficit) or a positive value (a surplus)
- if the calculation shows a deficit, no deferred affordable housing contribution will be required
- if the calculation shows a surplus of less than twice the maximum contribution, then the deferred affordable housing contribution will be half of the surplus
- if the calculation shows a surplus that is twice the maximum contribution or more, then the deferred affordable housing contribution will be capped at the maximum
- following independent verification of the further financial viability appraisal, the Council will give formal notice of the sum required, and payment shall be made within 28 days

2.99 Different arrangements may be appropriate in some cases, depending on character and scale of the development. For example:

- Where a phased development is proposed, and improvements in viability could potentially provide additional affordable housing within the development, it may be appropriate to undertake further financial viability assessment earlier in the process.
- In the case of large developments with a long site preparation and construction period, it may be appropriate to undertake more than one further financial viability assessment.
- It may occasionally be necessary to vary the formula for calculating surplus or deficit to reflect the particular viability appraisal model being used, but the Council will expect to agree a formula that reflects the principle set out in paragraph 2.95.
- An adapted mechanism will be necessary where a development will be managed for private rent by an institution.
- Using a growth model to assess viability may be an appropriate alternative to a deferred contribution in some circumstances where changes in the values and costs are predictable and the growth

model will maximise the affordable housing offer at the time an application is determined.

- 2.100 The further financial viability appraisal should comply with all the requirements for financial viability appraisal set out in paragraphs 2.65 to 2.92 this guidance, including the modelling of cash flows. Where inputs such as build costs and sales values are based on estimates rather than agreed contracts and transactions on homes within the scheme, we will expect appraisals to use appropriate projections with reference to trends in the requisite segment of the housing market and to sources such as BCIS indices. The Council will favour transparency and public disclosure of the further financial appraisal in accordance with the subsection of our Interim Housing CPG **'Transparency and confidential viability information'**.

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

- 2.101 Our Core Strategy and Development Policies promote mixed-use development and mixed and inclusive communities in line with the Government's NPPF. Development Policy DP1 indicates that housing contributions should normally be provided on site, while Development Policy DP3 indicates that affordable housing contributions should normally be made on site. Both policies do provide for off-site contributions, but only in a limited set of circumstances. The Council will only accept off-site contributions where provision cannot practically be achieved on-site in terms of meeting the criteria set out in the two Development Policies and accompanying paragraphs. The Council will only accept contributions in the form of payments-in-lieu in exceptional circumstances.
- 2.102 The Council will take the project management and implementation costs of off-site contributions into account and will expect there to be a neutral impact on Council expenditure and resources. Obligations may therefore need to include a payment to cover the additional costs of delivery of off-site contributions where such costs fall to the Council.
- 2.103 When considering the acceptability of off-site contributions and payments-in-lieu, we will have close regard to all relevant criteria in Development Policies DP1 and DP3 alongside accompanying paragraphs 1.15 to 1.24 and 3.13 to 3.30. We will also have regard to Core Strategy CS9 and the Council's support for residential communities in Central London, and ensure that off-site contributions do not undermine the benefits of mixed-use areas (such as those identified in paragraph 1.7 of our Development Policies document) or conflict with the creation of mixed and inclusive communities. These considerations apply to all sites regardless of size.
- 2.104 The Council will particularly expect contributions to be made on-site where the development is larger. Where mixed-use policy DP1 applies, we will expect on-site housing contributions where 1,000 sq m (gross) or more of additional floorspace is proposed. Where affordable housing

policy DP3 applies, we will expect on-site affordable housing contributions where 3,500 sq m (gross) or more of additional floorspace is proposed. It may not always be practical to include affordable housing within a market development (for example in smaller developments), however prior to considering an off-site contribution the Council will expect developers of all schemes to demonstrate that, on-site provision is not practical having regard to all the considerations referred to in paragraph 2.103 of this guidance.

2.105 The NPPF indicates that affordable housing provision should be made on-site unless an off-site solution is robustly justified. To meet this objective, the Council expects all options for on-site affordable housing to be fully explored, even where small developments are involved. Before they submit an application, we will expect applicants to fully consider different arrangements of the site and the scheme to secure the best possible prospect of achieving an on-site affordable housing contribution. In particular, applicants will be expected to show that the following options cannot practically deliver an on-site contribution before off-site solutions will be considered:

- where the site characteristics provide potential for a variety of scheme design and layouts, designing the scheme to provide a separate entrance (or entrances) and stair/ lift core(s) for affordable homes
- where it is only possible to provide a single entrance lobby and stair/ lift core, designing the communal spaces to ensure that service and management charges are sufficiently low for affordable housing occupiers and providers (see also paragraph IH2.71 in our Interim Housing CPG)
- approaching a range of housing associations and other providers (including the Council) to seek bids for acquisition of on-site affordable homes
- offering flexibility to housing associations and other providers to deliver different types of affordable housing (eg intermediate housing)
- where providing the full affordable housing contribution on-site is not financially viable, providing a reduced affordable housing floorspace on-site
- where an on-site solution is not financially viable, seeking a top-up payment from the Council's affordable housing fund.

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

2.106 The following terms are used in this guidance to shorten explanations of off-site arrangements:

- **application site** – the site of the proposed development that generates a policy requirement for housing under policy DP1 or affordable housing under policy DP3;
- **delivery site(s)** – one or more proposed development sites elsewhere intended to meet policy requirements off-site.

- 2.107 The paragraphs accompanying policies DP1 and DP3 indicate that where off-site provision is made, the overall percentage of housing/affordable housing and non-residential uses will be considered across the aggregate floorspace on all related development sites. In other words, the percentage requirement for an off-site contribution is calculated as a proportion of the floorspace at the application site and the floorspace at the delivery site(s) added together, rather than the application site alone. In the case of policy DP1, where there is a single target of 50% for negotiation of on-site contributions, off-site contributions should normally involve matching the non-residential floorspace increase at the application site with an equivalent increase in residential floorspace at the delivery site. In the case of policy DP3, where the sliding scale applies a formula is used to calculate off-site contributions. Figure 6 and Figure 7 below show how the off-site policy requirement can be calculated.
- 2.108 Calculating the percentage across floorspace on all related development sites helps to ensure that the policies do not provide an unintended incentive towards off-site contributions. Off-site contributions allow more non-residential floorspace (or market housing floorspace) to be developed at the application site. Considering the sites together ensures that this gain in non-residential floorspace (or market housing) also leads to a proportionate increase in residential floorspace (or affordable housing floorspace) at the delivery site.
- 2.109 Calculating the proportion across all related development sites also enables land swaps. A land swap enables a developer to offset additional non-residential floorspace (or market housing) at the application site by reducing non-residential floorspace (or market housing) elsewhere.
- Under DP1, redeveloping/ converting non-residential floorspace for off-site housing can be used to offset the addition of non-residential floorspace at the application site;
  - Under DP3, redeveloping/ converting market housing floorspace for off-site affordable housing can be used to offset the addition of market housing at application site.
- 2.110 A calculation of this type under policy DP1 is included in paragraph 1.16 of our Development Policies document and as Example 2 in Figure 6.

**Figure 6. Calculating off-site contributions under policy DP1**

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

**Example 1**

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

**Example 2**

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

Figure 7. Calculating off-site contributions under policy DP3

Additional market housing floorspace proposed - 'a'	Generally under 3,500 sq m for off-site affordable housing contribution to be considered
On-site affordable housing target -'b' (percentage)	Varies according to the sliding scale for sites with capacity for less than 50 homes
Off-site affordable housing target (proportion)	$= b / (100 - b)$
Affordable housing required off-site (secondary delivery site) - 'c' (sq m)	$c = a \times b / (100 - b)$

**Example**

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

- 2.111 Development Policies DP1 and DP3 indicate that we will take into account the economics and financial viability of development when considering off-site contributions as well as on-site contributions. The arrangements in paragraphs 2.65 to 2.92 of this guidance will apply, and applicants will need to submit financial viability appraisals to demonstrate that the application and delivery sites are providing the maximum reasonable contributions to housing (under DP1) or affordable housing (under DP3). Applicants will be required to fund an independent verification of the financial viability appraisal where the proportion or mix of housing/ affordable housing sought falls considerably short of the contributions anticipated by our Development Policies document and this guidance.
- 2.112 As indicated in paragraph 2.101 of this guidance, contributions to housing/ affordable housing should normally be made on site. Mechanisms guiding the delivery of housing and affordable housing should not create a financial incentive for the developer to make off-site contributions. Where the level of off-site contribution is below the level anticipated by our Development Policies document and this guidance, we will seek to ensure the additional value created by the development is broadly the same with an off-site contribution as it would be with an on-site contribution. In addition to the financial viability appraisal requirements of paragraphs 2.65 to 2.92, the Council may therefore

seek a comparison between the financial viability of on-site and off-site solutions (taking into account the existing use value and residual development value of the application site and delivery site).

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

- 2.113 Within Camden's Central London area there are a number of property investors and developers that own a significant number of sites. We may negotiate arrangements with such landowners to take advantage of commercial development opportunities, market housing opportunities and affordable housing opportunities on separate sites provided this does not compromise our objectives for mixed-use and mixed and balanced communities. In particular, owners of several sites may be able to bring forward developments of housing or affordable housing in advance of any policy requirement from Development Policies DP1 or DP3. In effect, the 'delivery site(s)' is/ are developed before the 'application site' has been identified (see paragraph 2.106 of this guidance for an explanation of these terms). The Council may agree to 'bank' this floorspace in the form of credits that can be accepted against the policy requirements from future development. When an 'application site' generates a housing/ affordable housing requirement, the Council will have discretion to agree to use of the 'banked' credits to offset part or all of the policy requirement.
- 2.114 The credits mechanism has potential to deliver additional housing and affordable housing earlier in the financial cycle by creating incentives for multiple site-owners to:
- seek opportunities for housing/ affordable housing development in advance during periods when commercial markets are poor rather than seeking to negotiate payments in lieu when commercial development prospects improve;
  - bring forward housing/ affordable housing development that they would otherwise hold back until commercial development prospects improve;
  - take up opportunities to convert lower value commercial properties to housing when leases expire;
  - provide affordable housing when the market for private housing would be unable to support it.
- 2.115 The mechanism can also help developers to deliver commercial floorspace or market housing more quickly when demand is strongest.
- 2.116 There are two types of credits that could be considered in this way:
- **residential land-use credits** – created where housing is provided but is not required by policy – these can be used where market housing is needed to offset additional commercial development under Development Policy DP1; and
  - **affordable housing credits** – created where affordable housing is provided in place of market housing but is not required by policy –



these can be used where affordable housing is needed to offset additional market housing development under Development Policy DP3.

- 2.117 The two types of credit could potentially be created by a single development at the same time if affordable housing is provided but there is no policy requirement for any type of housing. However, each type of credit can only be used once and only against a single policy requirement.
- 2.118 Residential land-use credits and affordable housing credits are types of off-site contributions, and will be governed by the policy considerations set out in paragraph 2.101 to 2.105 of this guidance. Paragraphs 1.15 and 3.15 of our Development Policies document indicate that off-site contributions should be made in the same area as the application site. In the case of residential land-use and affordable housing credits, the Council will only agree to bank credits from development in the Central London area, and will only allow credits to be used to offset requirements on another site in Central London. Credits should be used in reasonable proximity to the delivery site. In the Central London context, in most cases the Council will require credits to be used within 500 metres of the delivery site, taking into account any demonstrable benefits from allowing provision on a more distant site. The Council will not agree to credit arrangements that would erode the mixed-use character of Central London or add to concentrations of affordable housing at the fringes of Central London.
- 2.119 The Council will use two mechanisms to ensure that residential land-use credits and affordable housing credits serve to increase the overall delivery of housing or affordable housing.
- The Council will not agree to the formation of credits from development of market housing or affordable housing where this development would clearly have arisen regardless of any future DP1/DP3 requirements on other sites.
  - Where we agree to the use of credits to off-set a housing requirement from additional non-residential space or an affordable housing requirement from additional market housing, the credit required will be equivalent in floorspace terms to the overall increase in non-residential floorspace – or market housing floorspace – across the application site and the delivery site(s) together, in accordance with the considerations set out in paragraphs 2.106 to 2.110 of this guidance.
- 2.120 The Council may therefore agree to acknowledge development in Central London as creating residential land-use credits and/ or affordable housing credits subject to the following constraints:
- the creation of credits should form part of the resolution to grant permission for housing/ affordable housing on the 'delivery site'
  - the Council will only agree the formation of credits where this will serve to increase the overall delivery of housing or affordable housing

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

### **Payments in lieu**

*This sub-section (paragraphs 2.121 to 2.124) has been replaced by Interim Housing CPG (paragraphs IH2.99 to IH2.129)*

## Background

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

## Securing works / conditions / S106

- 2.125 Provision of housing required under Development Policy DP1 will generally be secured by a planning obligation under S106 of the Town and Country Planning Act 1990. The precise terms of the S106 agreement will vary between developments to reflect the nature and financial viability of the development. In most cases S106 terms will include:
- identifying all homes in the development
  - preventing the occupation of non-residential floorspace until the housing is completed and available for occupation, including non-residential development justified by a residential land-use credit agreed in association with a housing development on another site.
- 2.126 Provision of affordable housing required under Development Policy DP3 will always be secured through a S106 planning obligation. The precise terms of the S106 agreement will vary between developments to reflect the nature and financial viability of the development. In most cases, S106 terms will include:
- identifying all affordable homes in the development
  - specifying which homes will be social rented housing, which homes will be affordable rented housing and which homes will be intermediate housing
  - defining social rented housing in terms of the Government's national rent regime
  - defining intermediate housing<sup>1</sup> 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 terms of relevant guidance including the NPPF, the London Plan, the Mayor's Housing SPG, and

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<sup>1</sup> we will also take into account the Council's Intermediate Housing Strategy, adopted on 6 April 2016

in relation to Local Housing Allowance caps and lower quartile market rents available locally and across the borough

- identifying social rented, affordable rented and intermediate wheelchair homes
- arrangements for the development, fitting out and transfer of the affordable housing to an affordable housing provider as approved by the Council
- arrangements for the fitting out/ adaptation of wheelchair homes for occupation by a household containing one or more people who are wheelchair users
- preventing the occupation of some or all market housing until the affordable housing has been completed, fitted out and transferred to an affordable housing provider - including market housing justified by an affordable housing credit agreed in association with affordable housing development on another site
- securing availability of the affordable housing to future eligible occupiers, or securing recycling of public subsidy if the affordable housing is sold.

2.127 Other S106 terms that may be required in connection with DP1 and DP3 include:

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

**Resources / contacts**

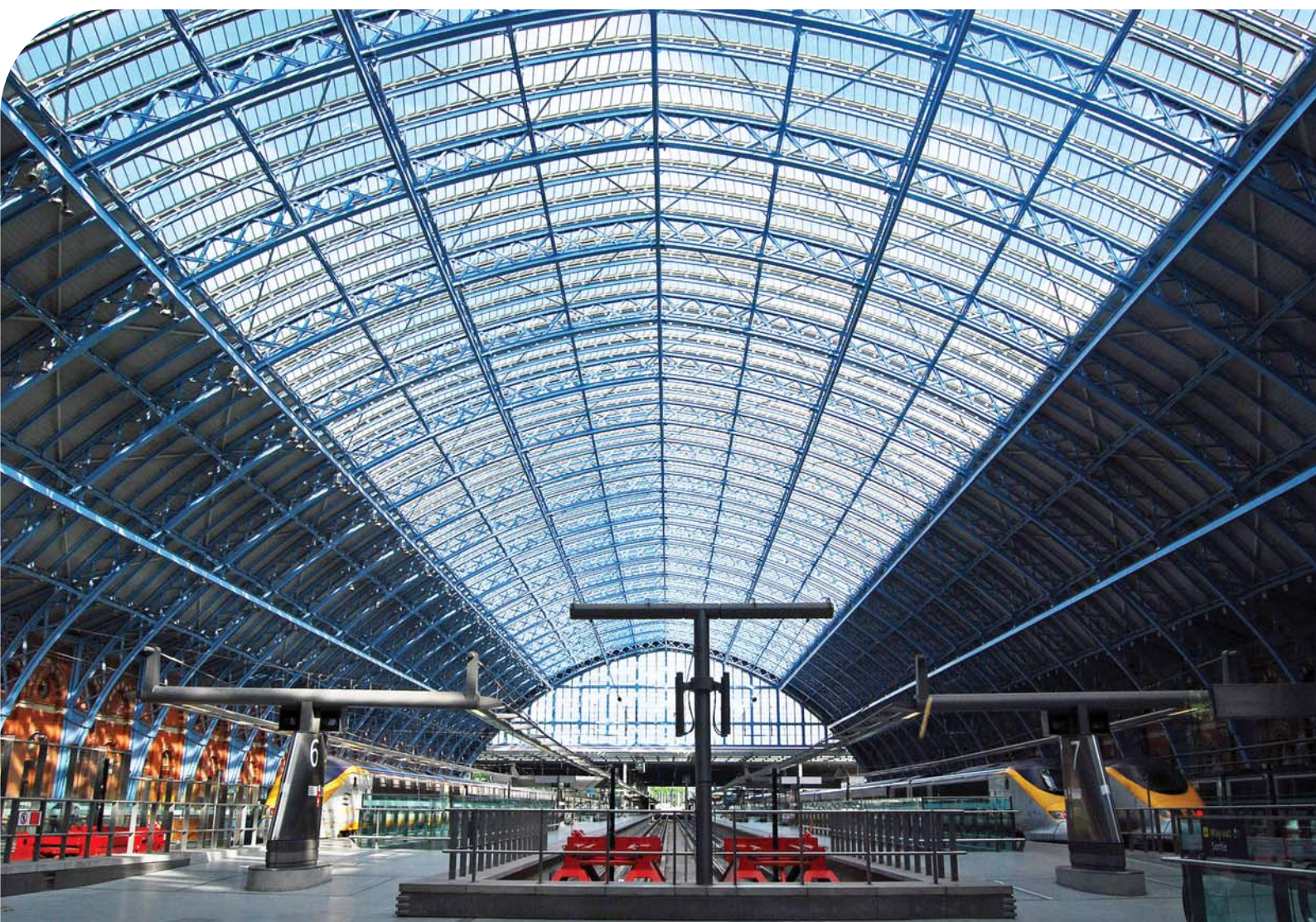
*This sub-section (Contacts and Resources tables) has been replaced by equivalent tables in the Interim Housing CPG after paragraph IH2.129.*

Camden Planning Guidance

# Transport

London Borough of Camden

CPG 7





## CPG7 Transport

1	Introduction .....	5
2	Assessing transport capacity .....	7
3	Travel plans.....	13
4	Delivery and servicing management plans .....	21
5	Car free and car capped development.....	25
6	On-site car parking.....	29
7	Vehicle access .....	35
8	Streets and public spaces .....	41
9	Cycling facilities.....	47
10	Minicab offices .....	56





# 1 Introduction

## What is Camden Planning Guidance?

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

## Transport in Camden

- 1.3 Camden benefits from excellent transport provision with international and national rail links, numerous tube stations and a large number of bus routes providing accessibility within Camden, to the rest of London and beyond. However, being a located in central London, the borough also faces considerable transport challenges, including congestion and poor air quality.

## What does this guidance cover?

- 1.4 This guidance provides information on all types of detailed transport issues within the borough and includes the following sections:
  1. Assessing transport capacity
  2. Travel Plans
  3. Delivery and Servicing Management Plans
  4. Car free and car capped development
  5. On-site car parking
  6. Vehicle access
  7. Streets and public spaces
  8. Cycling facilities
  9. Minicab offices
- 1.5 This guidance supports the following Local Development Framework policies:

## Core Strategy

- CS11 Promoting sustainable and efficient travel
- CS16 Improving Camden’s health and well-being

**Development Policies**

- DP16 The transport implications of development
- DP17 Walking, cycling and public transport
- DP18 Parking standards and limiting the availability of car parking
- DP19 Managing the impact of parking
- DP20 Movement of goods and materials
- DP21 Development connecting to the highway network
- DP32 Air quality and Camden's clear zone

## 2 Assessing transport capacity

### KEY MESSAGES

- A Transport Assessment is required for all schemes which will generate a significant travel demand
- Further guidance is contained within Transport assessment best practice guidance document, TfL 2006

- 2.1 This guidance aims to make sure that applicants submit all the information that is needed to determine a planning application in terms of the assessment of transport conditions before and after the development has taken place, and transport measures that will need to be secured before a development comes into use.
- 2.2 It relates to Camden Core Strategy policy CS11 - *Promoting sustainable and efficient travel* and policy DP16 - *The transport implications of development* of the Camden Development Policies.



### When does this apply?

- 2.3 This guidance applies to planning applications that involve a change in the way that a site is accessed from the highway, and planning applications that will alter how people or goods are moved, how many trips they make, and when the trips take place.
- 2.4 Reference should be made to Transport for London's guidance document 'Transport assessment best practice' for more detailed guidance, along with section 2 of this guidance, relating to Travel Plans. In line with policy DP16 of the Camden Development Policies document, where the transport implications of proposals are significant we will

require a Transport Assessment to examine the impact on transport movements arising from the development.

## **How should Transport Assessments be prepared?**

### **The requirement for a formal Transport Assessment**

- 2.5 Appendix 1 of the Camden Development Policies document provides guidance on the scale of development that is likely to generate a significant travel demand and therefore require either a transport assessment or a transport statement. The use class and floorspace relationships in Appendix 1 are simply guidelines, and have been selected on the basis that their travel characteristics are likely to have a significant impact on travel. The Council will require submission of a Transport Assessment for a development likely to have any of the following travel characteristics (having regard to any existing travel generated by activity on the development site):
- a) More than 1,000 person trips per day; or
  - b) More than 100 person trips during the morning or evening peak (0700-1000 or 1600-1900); or
  - c) More than 500 vehicle movements per day; or
  - d) More than 100 vehicle movements in any single hour; or
  - e) More than 20 heavy goods vehicles (over 7½ tonnes) per day; or
  - f) Any heavy goods vehicle movements between midnight and 6am.
- 2.6 Although a formal Transport Assessment is not required for schemes that do not have any of these travel characteristics, where there is any material change to travel patterns, information will still need to be submitted as part of the standard development control process, indicating the amount of travel that will arise, and when and how it will be accommodated (see paragraph 2.12).

### **Information required as part of a Transport Assessment**

- 2.7 At an early stage, applicants should discuss with the Council the scope of the Transport Assessment, and the most appropriate methods to use (e.g. data sources, estimation of trips generation, modelling requirements). The level of information contained within the Transport Assessment should relate in scale and kind to the particular development.
- 2.8 A Transport Assessment should generally include the following information. Please note that this table is a summary of the information contained within Transport assessment best practice guidance document, TfL 2006 and so reference should be to this TfL guidance.

Figure 1. Transport Assessment Requirements

<b>TA1. Description of development</b>	
a) Detailed site plan (min. 1:1250).	Always required.
b) Schedule of floor areas of existing uses on the site.	Always required.
c) Schedule of floor areas of proposed uses on the site.	Always required.
<b>TA2. Description of base networks</b>	
a) Plan showing relationship of site to the surrounding road, public transport, pedestrian and cycle networks. Include any tram routes or proposals.	Study area and base networks to be agreed with the Council.
b) Information on traffic flows, accident records, on-street parking conditions, and identify any critical links and junctions.	For proposals increasing motor vehicle movements, criteria C to D.
c) Information on frequency, reliability and capacity of bus, tram, underground and rail services within the study area.	For proposals increasing trips and trip concentrations, criteria A and B.
<b>TA3. Trip generation</b>	
a) Number of person trips generated by mode and time of day.	Always required.
b) Number and size of vehicles required to service the building.	Always required.
<b>TA4. Trip assignment</b>	
a) Assignment of vehicular trips to the road network.	For proposals increasing motor vehicle movements, criteria C to D
b) Assignment of public transport trips to the bus and rail networks.	For proposals increasing trips and trip concentrations, criteria A and B.
c) Justification for assignment methodology.	Always required.
<b>TA5. Vehicular access and circulation</b>	
a) Analysis of junction design for access and egress, using appropriate packages if necessary (such as PICADY, OSCADY, LINSIG and TRANSYT).	Always required where a new access is provided or where an existing access will be more intensively used.
b) Describe the arrangements for servicing and access for emergency vehicles.	Always required.
c) Describe the number, allocation and design of on-site parking and compare this with Council standards.	Always required.
<b>TA6. Pedestrians and cyclists</b>	
a) Assess the capacity and safety of existing pedestrian and cycle facilities and describe how they are affected by the development.	Always required.
b) Describe the number, allocation and design of on-site cycle parking and compare this with Council standards.	Always required.
c) Describe design features on or outside the site to assist pedestrians and cyclists.	Always required.
<b>TA7. Public transport</b>	
a) Assess the accessibility of the site by public transport.	Always required.
b) Identify BR and Underground stations and lines, tram routes or proposed tram routes, and bus services that will be significantly affected by the development. Evaluate and quantify impact of additional demand on capacity.	For proposals increasing trips and trip concentrations, criteria A and B.
c) Assess and quantify impact of additional road traffic on bus and tram reliability.	For proposals increasing motor vehicle movements, criteria C to D.
<b>TA8. Road network</b>	
a) Identify junctions and links that will be affected by development traffic. Quantify and evaluate the reserve capacity, queues and delays at critical junctions.	For proposals increasing motor vehicle movements, criteria C to D
b) Carry out a Safety Audit.	Only required where physical changes are proposed on the public highway.
<b>TA9. People with a transport disadvantage</b>	
a) Identify measures to make the site accessible to people with a transport disadvantage, including access for community transport services, the provision of designated car parking, drop-off points, shopmobility and scootability schemes (loan of scooters or electric wheelchairs to assist movement in the area around a home or destination from the initial point of arrival), and physical design features.	Always required.
<b>TA10. Environmental impact</b>	
a) The impact of generated traffic on air pollution and noise (unless included in an Environmental Assessment).	For proposals increasing motor vehicle movements, criteria C to D.
<b>TA11. Conclusions and recommendations</b>	
a) Summary of transport impacts.	Always required.
b) Details of remedial measures proposed to alleviate any identified problems or evidence provided that no remedial measures are necessary. In most cases, these will include outline provisions of a Transport Plan.	Always required.

- 2.9 The Regent's Canal in Camden has a transport function for walking and cycling and to a lesser extent for movement of passengers and freight by water. In addition to considering the highway and public transport networks detailed above, where a development is adjacent to the Canal, or the Canal forms a part of the pedestrian and cycle network close to a development, the Transport Assessment should consider how the development may affect travel on and alongside the Canal. Policy DP20 of the Camden Development Policies deals specifically with the use of the Regent's Canal for moving goods and materials.

### **What should the Transport Assessment achieve?**

- 2.10 Where an Assessment is submitted, it should enable the Council to consider whether:
- the development is acceptable in its proposed form and without any alterations to existing transport arrangements;
  - some alteration would be needed to the development or to transport facilities or networks in order to accommodate the travel it would generate in an acceptable way;
  - the development could not proceed without unavoidable harm to travel or the transport system, in which case the proposal will be contrary to LDF policy DP16, and will be refused by the Council if it is not withdrawn.
- 2.11 If the Assessment shows that amendments are needed, it should recommend specific amendments and mechanisms to ensure that these amendments take place in the event of the development being implemented. Recommendations might include:
- conditions to prevent implementation prior to the completion of planned transport provision with secured funding;
  - conditions to ensure that implementation is in phases, such that each phase follows completion of any necessary planned transport provision with secured funding;
  - a legal agreement to ensure submission and implementation of:
    - a travel plan to manage travel demand;
    - a servicing plan to manage on- and off-site servicing arrangements following completion;
    - a construction management plan for the period from commencement to full operational occupation of the development to manage on- and off-site construction traffic, delivery and removal of materials, and any temporary changes to other traffic movements (including pedestrian and cyclist movements) in and around the site;
  - changed on-site arrangements for pedestrians, cyclists, cycles or motor vehicles (including public transport) through substitution of drawings showing amended facilities for movement, picking-up and

setting-down, parking, storage, queuing, loading and unloading, and/or employee lockers and showers;

- changed off-site arrangements for pedestrians, cyclists, cycles or motor vehicles (including public transport) through a legal agreement to ensure funding and implementation of amended or new facilities for movement, picking-up and setting-down, parking, queuing, loading and unloading, and/ or other measures such as public transport services, shelters, information and signage, city car clubs and city car schemes.

### **Developments below the threshold for Transport Assessment**

- 2.12 Development Policy DP16 states that larger developments that would have implications for transport, but which fall below the threshold for a full transport assessment, will still be required to submit information regarding the transport implications of that scheme. Appendix 1 of the Development Policies document provides guideline floorspace thresholds for these types of developments. The type of information required is set out in DP16 and could be submitted as part of a Design and Access Statement.

#### **Further information**

Draft Guidance on Transport Assessment, Department for Communities and Local Government/ Department for Transport, August 2006 - this can be viewed on the consultation papers pages in the roads and vehicles section of: [www.dft.gov.uk](http://www.dft.gov.uk)

Transport assessment best practice guidance document, Transport for London, May 2006 – this can be obtained via TfL at: 0845 305 1234





### 3 Travel plans

#### KEY MESSAGES

- Travel Plans enable a development to proceed without adverse impact on the transport system
- The requirements of a Travel Plan will be tailored to the specific characteristics of the site and the development

3.1 This guidance explains the circumstances under which travel plans are sought, what they are intended to achieve, how they should be prepared, and what measures should be considered for inclusion. In addition to general guidance for travel plans, this section provides guidance on:

- Workplace travel plans;
- School travel plans;
- Residential travel plans;
- Visitor management plans; and
- Leisure and event travel plans.

3.2 It relates to paragraph 11.16 of Core Strategy policy CS11 - *Promoting sustainable and efficient travel* and policies DP16 to DP21 of the Camden Development Policies.



#### When does this apply?

3.3 This guidance applies to all planning applications that involve a significant impact on travel or the transport system. It will also guide consideration of Travel Plans submitted where the impacts are less, but where the transport provision does not have capacity for increased demand, and where demand management measures are desirable to

address sustainability concerns. Transport for London recommends that a Travel Plan be submitted for any residential development of over 30 units. Various uses may not fall into these categories (e.g. religious institutions), but we will seek Travel Plans where appropriate and requirements will be tailored to the characteristics of the site and the development.

- 3.4 Reference should be made to Transport for London's documents 'Guidance for workplace travel planning for development' (TfL, 2008) and 'Guidance for residential travel planning in London' (TfL, 2008) for more detailed guidance. Reference should also be made to planning guidance about Transport assessments. In line with Development Policy DP16, the Council will also require a Transport Assessment to be submitted in support of any development that significantly increases travel demand or would have a significant impact on travel or the transport system.

### **General guidance**

- 3.5 Travel Plans are one way in which developments can contribute to meeting targets on traffic reduction and improving air quality. A Travel Plan is a package of measures, generally developed by employers or property managers, which is designed to reduce car use and promote greener forms of transport. Travel Plans will often be a mechanism that arises from a Transport Assessment as a means of enabling a development to proceed without adverse impact on the transport system. The Council, Transport for London, and partners in the North and Central Travel-plan Network can provide advice and assistance in the creation of Travel Plans by organisations that are existing, new, relocating or expanding, including hospitals, schools, and businesses organisations.
- 3.6 Where a Travel Plan is necessary in terms of policy DP16 or because elements of the transport system have no additional capacity, submissions in connection will generally be secured by S106 agreement. This is because the applicant will rarely be the final occupier of the scheme, and furthermore a Travel Plan will require ongoing development subsequent to the initial occupation. Travel Plans will require monitoring on at least an annual basis, and the Council will usually require submission of a monitoring report.
- 3.7 Travel Plans are developed over time, with a typical 3-year target being a specified reduction in the number of motor vehicle trips. This means promoting and increasing cycling, walking, and the use of public transport so that a real choice may be made between all travel methods. It is the enthusiasm and commitment of the organisation in putting the theories into action that ensures a Plan's success. Key to this is the support of senior management in the development of a Travel Plan. If the development does not replace an existing use, the Council will advise on the appropriate modal split targets.

## **Workplace travel plans**

- 3.8 A workplace travel plan will usually contain measures geared particularly to promoting alternatives to single-occupancy car use. A workplace travel plan will be specific to each individual site and the nature of the business activity there. Workplace travel plans are potentially suitable for any organisation that generates a significant number of employee trips including offices, hospitals, distribution centres, large shops and supermarkets, cinemas and theatres, primary care centres and GP surgeries. Specific guidance is available on school travel plans where the travel of pupils needs to be considered.
- 3.9 As a minimum, a workplace travel plan should address travel by staff to and from work and on business. However, a travel plan may also address visitor, client and customer travel, suppliers making deliveries, contractors undertaking work on site and fleet procurement/management.
- 3.10 The key components necessary for all workplace travel plans are:
- corporate/management support and commitment;
  - designated travel co-ordinator;
  - consultation on the plan;
  - staff travel surveys - baseline & monitoring;
  - targets – challenging but achievable;
  - promotion of the package to the workforce;
  - monitoring – on-going, to check and maintain progress and development.
- 3.11 Detailed measures will include some or all of the following:
- restricted availability of workplace car parking, and introduction of charges;
  - a communication strategy detailing how sustainable transport and travel plan issues will be promoted to staff and visitors;
  - easily available in-house public transport information for all staff at the workplace and for visitors, including leaflets and maps, intranet and internet;
  - public transport promotion and initiatives including interest-free season ticket/ travelcard loans, and mutual beneficial links with public transport operators to increase ridership and improve the services convenient for the workplace;
  - promotion of car-sharing where walking, cycling and public transport is not an option;
  - cycle prioritisation and provision of secure and convenient facilities such as: well-lit, workplace parking; lockers; showers and changing rooms;
  - procurement of a cycle repair and servicing facility (possibly through external tender process);

- financial benefits for cyclists such as mileage allowances for work-related journeys, 0% loans and salary sacrifice initiatives for purchase of bikes and equipment, assistance with cycle insurance;
- replacement of company cars with more sustainable benefits, adjusted car allowances and loans to discourage car use and release resources for greener options;
- on-site charging for electric bikes and vehicles;
- reduction of vehicle emissions through policies such as regular emissions testing;
- scheduled replacement of any existing fleet or pool vehicles with pool bikes and other pool vehicles that use cleaner fuels;
- travel reduction initiatives – for example, increased working from home, teleworking and teleconferencing can reduce the number of employee trips to the workplace;
- walking encouragement and provision of information on the best routes to and from the workplace for commuting, working and leisure, for staff and for visitors.

### **School travel plans**

3.12 A school travel plan (STP) can bring benefits of safer and more sustainable transport for the whole community. Each STP will need must be designed to take into account and be tailored to local circumstances. Where a school has strong links with other schools in the area, consideration should be given to developing a joint STP. An STP can potentially result in:

- Less cars and congestion around the school;
- Healthier, more active pupils, families;
- Less pollution around the school;
- Safer walking and cycling routes around the school;
- Improved school grounds with provision for bicycle storage;
- A more accessible school site; and
- Improved attendance and achievement.

3.13 All STPs have to be sent to Camden and to Transport for London for approval. It is essential that an STP complies with the Transport for London criteria used to assess STPs. It must also be signed and approved the school's Headteacher and the Chair before submission. These criteria for assessing STPs are detailed in the TfL publication 'What a school travel plan should contain'.

### **Residential travel plans**

3.14 A residential travel plans provide a key mechanism for ensuring that sustainable access is an integral feature of a development. Each one should form a holistic package of measures integrated into the design, marketing and occupation of the site rather than 'retrofitted' once the

development is established. A residential travel plan provides a mechanism for setting out how the various parties (including the developer and future occupiers) can work together in partnership to encourage sustainable travel patterns.

- 3.15 Residential travel plans are concerned with journeys made from a single origin (home) to multiple and changing destinations. Each residential travel plan is site specific, with detailed measures partly determined by site opportunities and constraints such as the location of existing public transport routes, health facilities and workplaces in the immediate area. A residential travel plan should include parking restraint, and should support walking, cycling and public transport use. A residential travel plan should include both hard measures, such as site-design, provision of infrastructure and new services, and soft measures such as marketing, promotion and awareness-raising among residents. A S106 agreement securing a residential travel plan will also need to require that all future residents are informed of the existence of the travel plan and any restrictions it implies (for example, lack of access to parking permits in controlled zones).
- 3.16 The main objectives of a residential travel plan are to:
- address residents' need for access to a full range of facilities for work, education, health, leisure, recreation and shopping. In some cases this will mean providing facilities that reduce the need to travel, such as a local shop;
  - reduce the traffic generated by the development to a significantly lower level of car trips than would be predicted for the site without the implementation of the travel plan;
  - promote healthy lifestyles and sustainable, vibrant local communities;
  - encourage good urban design principles that open up the permeability of the development for walking and cycling linked to the design and access statements;
  - address specific problems identified in the site's Transport Assessment - for example, a road safety problem that prevents children or older people from gaining access to key facilities.
- 3.17 There are two distinct phases in development of a residential development plan:
- 3.18 Stage 1 should cover design, construction, occupation, and the first monitoring and review period. Preparation and implementation will initially rest with the developer or a consultant appointed by the developer, however implementation may involve a steering group which has representation from different agencies such as the local authority, public transport operators and residents (once they are in occupation). At this stage, the developer, the manager of the development, and the person designated as travel plan coordinator will have to be closely involved in managing and refining the travel plan. This period is crucial in terms of ensuring that the measures outlined in the plan are actively

implemented as part of the development and that the objectives and targets identified in the plan have potential to be met.

- 3.19 Stage 2 will be after full occupation of the development and completion of all measures to integrate the development with the surrounding area. Responsibility for managing and developing the travel plan will generally need to be passed on, and measures put in place to ensure that implementation of the plan continues.
- 3.20 It is important that an effective management structure is put in place to enable the overarching responsibility for the plan to be passed from the developer to the residents or to a residents' management company or to another body such as the Council. The manager will need to be able to ensure the continuation of travel plan measures such as car clubs, car share schemes. A residential travel plan will therefore need to specify its own management structures, which should generally have the following characteristics:
- identifying the developer as the party responsible for delivering the travel plan and for initial implementation, including responsibility for achieving the targets and objectives established in the travel plan. The plan should specify clearly at what point the developer can pass on responsibility for the plan wholly to residents, a management committee, or similar. Up to that time, steering groups and other management structures may assist in implementing the travel plan, provided that the developer retains ultimate responsibility;
  - establishing the ongoing management committee or group with a clear purpose, accountability and ability to take action – this is most likely to be achieved by developing a constitution for the group;
  - providing funding to ensure ongoing administrative support for the group once established and adequate resources to carry out continuing travel plan measures

### **Visitor management plan**

- 3.21 Where developments are likely to involve visitors arriving and leaving in taxis and coaches, submitted proposals should show how these can be accommodated without harm, and a Visitor Management Plan may be required to where it is necessary to impose controls on the types of vehicle, the times of arrival, and the specified picking-up and setting-down points.

### **Leisure and event travel plan**

- 3.22 Event travel plans are designed for short-term events (either regular or one-off) and as such will be implemented differently to workplace travel plans. The general structure of the plan will be similar but the content of each section will be different when dealing with events.

3.23 An event travel plan should contain the following:

- Background information - providing an overview of the event and its organisers and including information on any existing environmental policy, why a travel plan is being produced and detailing the location of the event along with some information on the site's accessibility.
- Site audit and survey - providing the information to inform the rest of the travel plan. The site audit provides details on how accessible the site is by various forms of transport and includes both on-site and off-site infrastructure.
- Aims and objectives - broad statements of intent regarding what it is hoped the travel plan will achieve.
- Targets - There are two types of target that can be set for a travel plan. The first is known as an 'aim-type' target and is generally based on the percentage share of each travel mode used, and the other type of target that is set is the 'action-type' target which sets a deadline for a certain action to have taken place.
- Measures - detailing the various incentives and initiatives that can be employed to achieve the targets set in the previous section. The measures that are implemented will depend on various factors including the results of the surveys, the size of the event (area or number of visitors), the site audit and the amount of funding available.
- Monitoring Strategy and Management Structure – in order to record the overall success of the travel plan as well as how effective individual measures have been.
- Action Plan – providing a summary of how the travel plan will be implemented and monitored. An action plan typically lists the measures that are due to be implemented along with details on who is responsible, when they are to be undertaken, how the success will be gauged and which aims and objectives they relate to.

### Further information

Government resources related to travel plans can be viewed in the sustainable travel section of: [www.dft.gov.uk](http://www.dft.gov.uk)

Residential and employment travel plans best practice guidance documents, Transport for London, forthcoming 2006-07 – when published these will be available from TfL at: 0845 305 1234

What a school travel plan should contain, Transport for London - this can be viewed on the Camden Schools/ School Travel Plans/ Success Factors pages in the education section of Camden's website - [www.camden.gov.uk/ccm/navigation/education/camden-schools/school-travel-plans/success-factors/](http://www.camden.gov.uk/ccm/navigation/education/camden-schools/school-travel-plans/success-factors/)





## 4 Delivery and servicing management plans

### KEY MESSAGES

- Transport Assessments represent the best tool to consider how a development can most appropriately be serviced
- Developments should accord with the Servicing Guidelines provided in this guidance

- 4.1 The purpose of this guidance is to give details on how Delivery and Servicing Management Plans can be used to manage and mitigate the potential impacts of deliveries and servicing on the amenity of occupiers and neighbours.
- 4.2 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?

- 4.3 This guidance applies to all development proposals which are likely to generate delivery and servicing movement and therefore may incur significant noise and disturbance impacts. Further details on the circumstances in which the Council will expect/require Delivery and Servicing Management Plans are set out within this guidance.

### How should Delivery and Servicing Management Plans be prepared?

#### Service vehicles and waste collection

- 4.4 General guidance on requirements for service vehicles and goods vehicles is given in Development Policy DP20 - *Movement of goods and materials*. Transport Assessments represent the best tool to consider how a development can most appropriately be serviced. Loading and unloading for some developments can safely and appropriately take place on-street, depending on the nature of the street and the development. Where a development is most appropriately serviced off-street, the application should show that the development will accord with the servicing guidelines shown in the table at the end of this section.
- 4.5 Guideline thresholds for the scale of development where a Transport Assessment will be required are given in LDF Development Policies Appendix 1. For development of significant floorspace in commercial use and residential institutions, the LDF proposes off-site bays for servicing, but also proposes a Transport Assessment that can test the appropriateness of alternative solutions.

- 4.6 For retail-type floorspace (Use Classes A1-A5), the guideline threshold is developments of 1,000 sq m or more. For other commercial floorspace, hotels, and institutional residential accommodation such as hotels, colleges and hostels, the guideline threshold is developments of 2,500 sq m or more. The transport characteristics of Use Classes D1-D2 (including surgeries, places of worship and cinemas) are too variable for any assumption to be made about the need for on-site servicing, but a Transport Assessment is sought in most cases.
- 4.7 The scale of a development is not the only factor controlling the servicing needs it generates. A Transport Assessment is required for any development that would significantly impact the transport system under policy DP16 of the Camden Development Policies. This could be expected to include, for example, any development serviced on-street and likely to receive more than 10 deliveries a day or 2 deliveries an hour. Assessment is also required for developments that generate a number of heavy vehicle movements (see the Assessing Transport Capacity section of this guidance).
- 4.8 If waste collection vehicles need to access a development site, this can be a key consideration in the design of motor vehicle access and circulation spaces. Information on the amount of space needed for sorting and storage of waste on-site prior to collection is given in the Waste recycling and storage section of CPG1 Design. The Council does not generally allow waste to be left on the highway for collection on a specified day except in the case of residential development of 6 dwellings or less.
- 4.9 External storage space for large waste containers is sought for residential development of 7 dwellings or more, and for most non-residential development. The external storage space should be at or near street level, and within 10 metres of a place suitable for a collection vehicle to stop. If appropriate external storage space for waste cannot be provided within 10 metres of the public highway, it will generally be necessary for the collection vehicle to access the development site. In this case, circulation spaces will need to be considered in the same way as those for service vehicles.

### Servicing Guidelines

Swept paths	Applicants should provide evidence of swept paths on submitted drawings.
Turning areas	Normally, all vehicles must be able to enter and leave the site in a forward facing direction. If in exceptional cases this is not possible, the service area must be designed to enable vehicles to reverse off the highway rather than onto it.
Demarcation	Servicing bays and turning areas should be clearly marked out, for example, by the use of different colours and materials, to discourage their misuse for car parking and storage.
Pedestrians	Care must be taken to provide safe segregated routes for use by pedestrians. Where access roads for service vehicles represent the most direct or visible route for pedestrians, a segregated footway at least 1.8 m in width should be provided with direct links to each pedestrian entrance of each building on site.
Access roads	A minimum carriageway-width of 6.0 m is required where an internal access is designed for two-way use by service vehicles. Where a footway is not provided to each side, a safety margin with a minimum width of 0.5m must be provided wherever there is no footway.
Headroom	A vertical clearance of 3.5m must be provided for light and medium goods vehicles.

### Further information

CPG1 Design, LB Camden 2011

Camden Streetscape Design Manual, LB Camden 2005

Camden Council transport strategies and plans, including the Streetscape Design Manual, can be viewed in the transport and streets section of the Council's website

Residential roads and footpaths: layout considerations - Design bulletin 32 (2nd edition), HMSO 1992 – this can be obtained via:

[www.tsoshop.co.uk/bookstore.asp](http://www.tsoshop.co.uk/bookstore.asp)



## 5 Car free and car capped development

### KEY MESSAGES

- We expect car free development in the borough's most accessible locations and where a development could lead to on-street parking problems
- Legal agreements will be used to maintain car-free and car-capped development over the lifetime of a scheme

- 5.1 This section explains further the terms car-free and car-capped development, as referred to in the Camden Core Strategy and Camden Development Policies, the mechanisms that are needed to secure them, and the circumstances in which it will be appropriate for the Council to refuse additional dwellings that are not car free or car capped.
- 5.2 It relates to Core Strategy Policy CS7 – *Promoting sustainable and efficient travel* and policies DP18 – *Parking standards and limiting the availability of parking* and DP19 - *Managing the impact of parking* of the Camden Development Policies.

#### **Car-free development**

A development which has no parking within the site and occupiers are not issued with on-street parking permits

#### **Car-capped development**

A development which has a limited amount of on-site car parking, but no access to on-street parking permits.

- 5.3 Car-free and car capped development is successful in Camden because most of the borough has very good access to public transport services. Levels of car ownership are low compared with London generally, and choosing not to own a car can be an attractive lifestyle option. The guidance in this section covers:
- What car free development is, and where it is sought;
  - What car capped development is, and where it is sought;
  - Implementation of off-street parking restrictions for car-free and car-capped development, including partial provision of car free and car capped development, and maintaining the on-street parking rights of existing occupiers;
  - Meeting the parking needs of disabled people.

### **When we expect car free and car capped housing**

- 5.4 Car free and car capped requirements apply to developments in particular locations and circumstances:
- we expect car free development in the Central London area, our town centres and other areas with high public transport accessibility (see Development Policy DP18);

- we will also expect car free development where the creation of a new access could lead to on-street parking problems where the loss of kerb space creates unacceptable parking pressure. Refer to Development Policy DP21, and the Access section of this guidance for more information);
  - Car capped development applies to schemes that would have an unacceptable impact on on-street parking conditions or highway management and safety through the introduction of new units with access to on-street parking permits (see Development Policy DP19).
- 5.5 Car-free or car-capped housing may be sought wherever development involves the creation of one or more additional dwellings – whether newly built, or created by a conversion or change-of-use.
- 5.6 Non-residential development can potentially involve car-free or car-capped designation if it creates a new non-residential address or involves a change-of-use that would otherwise increase the demand for car parking. This reflects the operation of the parking permit scheme, where permits relate to individual addresses.

### **Car free development**

- 5.7 Car-free development is development that does not have any car parking. No parking is provided or allowed on the site (except parking designated for disabled people), and all of the dwellings or units created are not entitled to on-street car parking permits. Where we seek car free development our parking standards do not apply as no parking is allowed.
- 5.8 Camden Development Policy DP18 states that we will expect development to be car free in the Central London Area, the town centres of Camden Town, Finchley Road/ Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other highly accessible areas.
- 5.9 'Highly accessible areas' are considered to be areas with a public transport accessibility level (PTAL) of 4 and above. The PTAL of a specific site can be established using Transport for London's Planning Information Database website pages, which can be found at: <http://webpid.elgin.gov.uk/>.
- 5.10 Car free development will also be required where the creation of an access to allow off-street parking would reduce the availability of on-street parking (see also section 6 of this guidance on vehicle access), or would otherwise cause problems relating to highway management or safety. Policy DP19 of the Camden Development Policies states that we will resist developments that would harm on-street parking conditions or harm highway safety.

### **Car capped development**

- 5.11 Car-capped development is development in which all of the dwellings or units created are not entitled to on-street car parking permits, although some or all of the dwellings or units created may have a parking space

on the site, in accordance Camden's parking standards (see policy DP18 and Appendix 2 of the Camden Development Policies). It therefore differs from car free development because some on-site car parking is allowed, in line with Camden's parking standards.

- 5.12 Car capped development is sought in developments that are not in the locations listed in paragraph 4.7 above, where additional off-street spaces can be accommodated within the development without harming highway or on-street parking conditions, but where additional on-street car parking is not considered acceptable.

### **Circumstances where additional on-street car parking is not acceptable**

- 5.13 There are parts of the Borough where increasing competition for on-street parking through introducing additional premises with on-street parking rights is not acceptable. This is generally the case in the Central London Area, but also in many other areas where the parking spaces available cannot meet existing demand. This has implications for queuing and congestion, illegal parking, and highway safety. In these circumstances, if a developer will not enter into an agreement to designate the additional development as car-free or car-capped, planning permission will not be given.
- 5.14 In considering the ability of available on-street parking to accommodate the impact of additional development, we will have regard to the cumulative effect of proposals in the area, including unimplemented and partly implemented schemes already granted planning approval.
- 5.15 Our Parking and Enforcement Plan provides regularly updated permit data, which is used to establish levels of on-street parking pressure on each of the borough's roads. This information will be used when considering the acceptability of applications that would involve the potential allocation of additional on-street parking permits to the future occupiers of new development.

### **Implementation of on-street parking restrictions for car-free and car-capped development**

- 5.16 The whole of Camden has controlled parking and, in principle, is appropriate for car-free or car-capped development. On most days, most parking spaces on residential streets are only available to people holding a parking permit issued by the Council. In Controlled Parking Zones we can restrict access to on-street car parking because we can control the issuing of parking permits.

#### **Controlled Parking Zones**

Designated areas in regulations control how parking may be used on different sections of the street and at different times.

- 5.17 In order to be able to maintain car-free and car-capped development over the lifetime of a scheme, the developer will be required to enter into



a legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended), which would permanently remove the entitlement to an on street parking permit for each home created:

- 5.18 The legal agreement requires the owner of the development to inform incoming occupiers that they are not eligible to obtain a parking permit for on-street parking, or to purchase a space in a Council-controlled car park. This part of the legal agreement stays on the local search in perpetuity so that any future purchaser of the property is informed that occupiers are not eligible for parking permits.

### **Maintaining on-street parking rights of existing occupiers**

- 5.19 Existing parking rights can normally be retained on development sites, where it can be demonstrated that existing occupiers are to return to the address when it is completed. This is common where an existing dwelling or block is being extended or subdivided. It can also occur where a change-of-use brings a site or property into residential occupation.
- 5.20 If a development is to have new occupiers, existing parking rights will not apply, and the Council will apply its car-free / car-capped policies as set out in Development Policies DP18 and DP19.

### **Meeting the needs of disabled people**

- 5.21 Car-free development and car-capped development should be designed taking into account the needs of disabled car users. Blue Badge holders are able to use parking spaces in Controlled Parking Zones without a parking permit. Minimum parking standards apply to parking for people with disabilities, and 1 parking space for people with disabilities is required per 10 general-purpose dwellings (see Appendix 2 of the Camden Development Policies document). In addition, where car-free and car-capped developments contain wheelchair housing, the Council will expect a parking space to be provided for each wheelchair dwelling. Where a resident in need of a reserved disabled parking space moves into a development with no off-street spaces, the Council will consider a request for a designated disabled space on-street in the same way whether the development is formally car-free or not.

### **Further information**

- 5.22 In addition the guidance above regard should also be had to Camden's Parking and Enforcement Plan (2004), which provides further information on our approach to managing parking in the borough.

## 6 On-site car parking

### KEY MESSAGES

This section includes detailed guidance on:

- Implementation of numerical car parking standards
- Dimensions and layout of spaces, including dedicated spaces for disabled people
- Underground and stacked parking
- Car clubs and pool cars
- Electric charging points

6.1 This section assists applicants for developments that will involve the provision of off-street parking spaces.

6.2 It relates to Core Strategy Policy CS11 - *Promoting sustainable and efficient travel* and policy DP18 - *Parking standards and limiting the availability of car parking*; and Appendix 2 Parking standards of the Camden Development Policies. It should be read in conjunction with section 6 of this guidance on vehicle access.

### When does this apply?

6.3 This guidance applies to planning applications that involve creation of off-street parking spaces, in line with the standards set out in the Camden Development Policies. The parking requirements for emergency services, such as ambulance, fire and policing facilities, will be assessed on an individual basis, having regard to the specific operational needs of a particular use.

6.4 Applicants should first seek to minimise car use from their development, in accordance with Core Strategy Policy CS11 and policies DP16-DP20 of the Camden Development Policies. Alternative measures include:

- provision for walking, cycling and public transport;
- car-free development so that there is no need for parking; and
- car clubs and pool cars.

### How should on-site car parking be provided?

6.5 Standards for the number of spaces required for car parking and servicing are given in Camden Development Policies Appendix 2.

6.6 Thresholds and standards are given as a gross floor area (GFA) relating to the development as a whole, and are not intended to be applied separately to individual units that form part of a larger development. Shared use of parking spaces and servicing bays between units will be encouraged where practical.

- 6.7 Where a development crosses a threshold, requirements apply to the entire floorspace, not only the floorspace above the threshold. For example, for hotels, the requirement for visitor parking spaces for people with disabilities is 1 space per 1,250 sq m from a threshold of 2,500 sq m (Development Policies Appendix 2). This means that no requirement applies to a hotel of 2,000 sq m, but for a hotel of 5,000 sq m, a requirement of 4 spaces for disabled visitors applies.
- 6.8 Paragraph 18.7 of Camden Development Policies addresses the provision of parking for employees with a need for “continuous access to a car for work purposes”, as part of the maximum standards for employment generating uses. For the removal of doubt, this refers to travel needs that cannot be met by walking, cycling or public transport, and relates to access during the working day, not commuting to and from work

**Dimensions and layout of car parking spaces**

- 6.9 Figure 2 below sets out our minimum standards for the dimensions and layout for off-street car parking spaces.

**Figure 2. Dimensions and layout of car parking spaces**

Off-street car parking space (standard)	2.4m wide by 4.8m deep.
Front Garden/Forecourt	5.0m wide by 6.0m deep.
Off-street car parking space for use by disabled people	3.3m wide by 4.8m deep.
Layout of car parking spaces for general use	<p>90° parking – aisles may be two-way The minimum aisle width between the ends of spaces is 6.0m</p> <p>60° parking – aisles must be one-way The minimum aisle width between the ends of spaces is 4.2m</p> <p>45° parking – aisles must be one-way The minimum aisle width between the ends of spaces is 3.6m</p>

- 6.10 Disabled parking should be in line with the Mayor’s Draft London Housing Design Guide SPG (July 2009), which states in paragraph 3.3.2 that “Each designated wheelchair accessible dwelling should have a car parking space 2.4m wide with a clear access way to one side of 1.2m wide”.
- 6.11 Dedicated car parking spaces for use by disabled people should be designated with appropriate markings and signs. These spaces should be located as close as possible to main pedestrian entrances and passenger lifts. There must be no obstruction – such as a raised kerb or

heavy doors - between the parking spaces and the entrance to the building. In considering the appropriateness of distances to the furthest facility served by a dedicated parking space, the following guidelines will be taken into account:

Uncovered route	Less than 50m
Covered route (unenclosed or part enclosed)	Less than 100m
Completely enclosed route (unaffected by bad weather)	Less than 200m

- 6.12 In addition to dedicated parking spaces, where premises are likely to attract visits by the public, vehicular setting down and picking up points suitable for use by disabled people should be available as close to main building entrances and passenger lifts as possible.

### **Underground and stacked parking**

- 6.13 Because of the high cost of land in Camden, some developers are seeking to use more space-efficient forms of car parking, such as underground and 'stacked' parking.
- 6.14 Whilst the Council considers that such provision can be appropriate in some circumstances, it must not cause harm in terms of visual impact and safety. In particular, proposals for underground and stacked parking would need to satisfactorily address potential issues in relation to vehicles queuing/ waiting, and impact on the highway, congestion and safety as vehicles manoeuvre around the site, along with any archaeological implications.
- 6.15 As with any car parking provision, underground and stacked parking must meet Camden's parking standards.

### **Car clubs**

- 6.16 Paragraphs 11.18 of the Camden Core Strategy and 18.14 and 18.15 of the Camden Development Policies encourage the provision of car club spaces as an alternative to the provision of private car spaces, in order to make private transport more sustainable.
- 6.17 We will seek publicly accessible spaces, where provision is made as part of development. This enables spaces to form part of a wider network, improving accessibility to spaces, benefitting the local community and reducing impact on the public highway (by avoiding the provision of additional on-street spaces).
- 6.18 Developers should provide spaces for a Camden-approved city car club operator. Please contact the Council for our full list of approved operators.
- 6.19 The Council's preference is for the provision of car club spaces for electric or low carbon vehicles.



### Electric charging points

- 6.20 As part of our approach to making private transport more sustainable, the Council promotes the use of low emission vehicles, including through the provision of electric charging points (see Camden Core Strategy Policy CS11).
- 6.21 Electric charging points allow electric vehicles to charge up whilst parked, ready for the next journey, and are normally located in dedicated parking bays. Further information on electric charging points can be found at: <http://www.newride.org.uk/>
- 6.22 We will seek the provision of electric charging points as part of any car parking provision in new developments (policy DP18 of the Camden Development Policies). The emerging London Plan (policy 6.13 Parking) states that 1 in 5 new spaces provided in new developments should provide charging points.
- 6.23 The Council will promote provision of electric vehicle charging spaces as an alternative to any general car parking spaces, but particularly if the charging spaces will be for electric pool cars or electric car-club cars. We will encourage use of renewable energy to provide power for charging points.
- 6.24 Parking for low emission vehicles, pool cars and car clubs should be provided from within the general car parking allowed by Camden's parking standards. If they are provided in addition to general car parking spaces, they are unlikely to be effective in encouraging more sustainable means of transport, and to the Council's overall aim of reducing congestion in the Borough.

### Further information

- 6.25 The creation of off-street parking spaces will often require the creation of a new vehicle access to a site. This section should therefore be read alongside section 6 of this guidance on Access to sites for motor vehicles, which sets out how proposals involving new means access are judged in terms of impact on the highway, safety and visibility for emerging vehicles.

6.26 Other useful sources of information include:

- Mayor’s draft Housing SPG, which contains detailed guidance on the levels of car parking;
- Manual for streets; DfT; 2007, which provides guidance on accommodating car parking within the street environment; and
- Camden Parking and enforcement plan, which sets out a comprehensive approach to managing parking and addresses the need for effective enforcement of parking controls, for both on-street and off-street parking.



## 7 Vehicle access

### KEY MESSAGES

- Planning permission must be sought for works to create or alter an access onto a classified road
- The Council will not approve applications that would cause unacceptable parking pressure or add to existing parking problems

- 7.1 This section gives guidance on designing developments to provide safe access and use by motor vehicles, ensuring that new means of access do not cause harm to the safety of other users of the development and the adjacent highway. It focuses on the Council's approach to planning applications that include new footway crossovers and new access routes to enable access to properties and sites.

#### Footway crossover

A dropped kerb or short ramp to permit vehicle access.

- 7.2 It relates to Core Strategy Policy CS11 - *Promoting sustainable and efficient travel* and policies DP18 - *Parking standards*; DP19 - *Managing the impact of parking*; and DP21 - *Development connecting to the highway network* within the Development Policies.
- 7.3 This section provides guidance on how proposals are judged in terms of:
- impact on the highway network and on-street parking conditions;
  - visibility and sightlines for emerging vehicles;
  - impact on the footway;
  - layout and dimensions for footway crossovers; and
  - Preventing waiting on the highway for schemes that include controlled access points, lifts and ramps.

### When does this apply?

- 7.4 This guidance applies to planning applications that involve a change in the way that a site is accessed from the highway.
- 7.5 Planning permission must be sought for works to create or alter an access onto a classified road, including a crossover over a footway or pavement to provide access onto private land. However, there are certain circumstances where planning permission may not be required for access to a paved area or garage. These can include an access:
- from a road that is not classified (classified roads are listed in the Camden Network Management Plan);
  - to a property that is not subdivided into flats, and is occupied by a single household.



**Classified road**

A road which has a number in the national road system (i.e. M - motorway, A - first-class road, and B - secondary road).

- 7.6 Before considering applications for vehicle access we will first assess how an application has sought to minimise car use in accordance with Core Strategy Policy CS11 and policies DP16 - DP20 of the Camden Development Policies document. Relevant alternative measures include:
- provision for walking, cycling and public transport;
  - car-free development so that there is no need for parking; and
  - car clubs and pool cars.

- 7.7 It should also be noted that, separately to planning permission, consent is required from the relevant Highway Authority for a new or altered access from the public highway onto private land, and must be obtained before embarking on any work. The Council is the Highway Authority for all public roads in the Borough except the Transport for London Road Network (see Development Policies Map 1), for which, Transport for London is responsible.

**How should vehicle access be provided?**

- 7.8 Access to a site by motor vehicles will either be by driving over the footway using a crossover or the footway will be interrupted by a new junction to create a level access direct from the carriageway:
- Crossovers may be appropriate where the site is not intensively used by vehicles. The Council's Street Management Division will advise on the appropriateness of crossovers and, where a crossover is appropriate, will generally carry out its construction at the developer's expense, in accordance with the design requirements set out in the Camden Streetscape Design Manual;
  - Direct access using a new junction is likely to be appropriate either where the site is intensively used by vehicles, or where access is required by heavy goods vehicles. The Council will seek adoption of new roads, and so they must be designed in conjunction with the Council's Street Management Division (see Development Policy DP21).

**Impact on the highway network and on-street parking conditions**

- 7.9 The Council's approach to development and highway management is set out in policy DP21 of the Camden Development Policies, which seeks to ensure that new connections to the highway network from developments do not cause harm to the network, to its users or the environment. Applicants whose schemes will connect directly to the highway network should also refer to Camden's Network Management Plan and consult Council.
- 7.10 The creation of off-street parking and new access routes frequently involves the loss of on-street parking spaces due to the creation of a

crossover over the kerb. As set out in paragraphs 19.6 - 19.9 of the Camden Development Policies document, we will not approve applications for planning permission (and for highways consent) that would cause unacceptable parking pressure or add to existing parking problems.

- 7.11 Camden's Parking Enforcement Plan Parking provides regularly updated parking permit data, which is used to establish levels of on-street parking pressure on each of Camden's roads. This information will be used when considering the acceptability of applications that would involve the loss of on-street parking spaces.
- 7.12 We will require developments to be car free, where necessary, in order to avoid harmful impacts on on-street parking conditions through the creation of new access routes (see section 4 of this guidance for more information on our approach to car free development).

### **Visibility and sightlines for emerging vehicles**

- 7.13 Vehicles joining the highway network need clear views of pedestrians, cyclists and other traffic, and users of the highway network need clear views of those joining it. Views can be obstructed by boundary treatments and parked cars. The relationship between motor vehicles and cyclists and pedestrians is particularly sensitive.
- 7.14 Adequate visibility for emerging vehicles should be provided with new vehicle accesses, or development that effects existing vehicular accesses. Developers should refer to the Manual for Streets for guidance.

### **Layout and dimensions for footway crossovers**

- 7.15 It is essential that footway crossovers do not harm ease of pedestrian movement, and the front building line should provide a minimum pavement width of at least 1.8 metres. Any changes to the public highway would need to be approved by the highway authority and design details should be discussed with Camden highway authority prior to the submission of an application.
- 7.16 It is important that new access points are not overly steep, in order to allow for safe and convenient access. For normal pavement crossovers that involve a dropped kerb, the Council will apply the following gradients:
- Vehicular ramps from the carriageway to the area of level footway should be a maximum of 15% (1:6);
  - For pedestrians dropped kerbs should be a lower gradient.
  - For longer vehicular ramps, the Council will apply the following gradients:
  - Vehicular ramps should be a maximum gradient of 10% (1:10)

- For pedestrians, ramps should be a maximum gradient of 1:12, in line with the Disability Discrimination Act (DDA) requirements (although a gradient of 1:20 is preferred)

7.17 Where possible, the ground floor level of a development should be the same as the level of the highway, in order to avoid the provision of unnecessary steps, and to allow the footway to be constructed with an adequate slope (i.e. “crossfall”) to allow water run off.

**Preventing waiting on the highway: Controlled access points, lifts and ramps**

7.18 Sometimes it will be necessary to provide a limited amount of space for vehicles on the site or curtilage, with controls at the point of entry and/ or provision of vehicle space at a different level from the street, accessed by a vehicle ramp or lift.

<p><b>Curtilage</b> The enclosed area of land adjacent to a dwelling house.</p>
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7.19 In each case, an area should be provided within the site for all vehicles waiting for a traffic signal, barrier or vehicle lift. This area should be sufficient to accommodate the maximum likely number of queuing vehicles, without any obstruction to pedestrians and vehicles using the public highway. Where a lift, ramp or other access is only available to one vehicle or direction of flow, there must be space at each end for leaving vehicles to pass those queuing to enter.

7.20 Depending on expected traffic flows, access roads may be expected to be two-way. Segregated areas for pedestrians and/ or cyclists may also be required.

**Further information**

7.21 The Council’s Road Network Management Plan establishes the road hierarchy in Camden and provides a list of classified roads in the borough. It sets out how the Council will manage the road network in order to provide for efficient movement of vehicles and pedestrians and reduce disruption and congestion.

7.22 The Camden Streetscape Design Manual provides information on the Council’s expectations for the detailed design and layout of highways, footways and public spaces in Camden. Detailed consideration should be given to the Manual before designing any highway works.

7.23 Other relevant documents include:

- Department of Environment, Department of Transport Design Bulletin 32 - Residential Roads and Footpaths - Layout Considerations – which describes the main considerations that should be taken into account in the design of residential layouts. It also takes into account new initiatives on matters such as road safety and includes references to improvement schemes on existing estates.

- Design Manual for Streets; DfT, 2007 – which provides advice for the design of residential streets and the creation of sustainable and inclusive public spaces.
- Design manual for roads and bridges – which is a series of 15 volumes that provide official standards, advice notes and other documents relating to the design, assessment and operation of trunk roads and motorways.

7.24 Regard should also be had to:

- the creation of high quality streets and public spaces (see section 7 of this guidance);
- potential community safety issues associated with forecourt parking – see Core Strategy policy CS17 and Designing safer environments section of the CPG1 Design.



## 8 Streets and public spaces

### KEY MESSAGES

- New development should contribute to the creation of attractive, clean and well-maintained public places
- All new pedestrian areas and footpaths are required to be constructed to a standard that is considered appropriate for adoption by the relevant Highway Authority.

- 8.1 This section provides guidance on the design and layout of streets and public spaces. It aims to ensure that a good quality pedestrian environment and good pedestrian access are provided. This includes ensuring that development is accessible to all members of the community, including all disability groups.
- 8.2 The guidance relates to Camden Core Strategy Policy CS11 - *Promoting sustainable and efficient travel* and policies DP16 - *The transport implications of development* and DP17 - *Walking, cycling and public transport* and DP21 - *Development connecting to the highway network* in Camden Development Policies.

#### Public realm

All areas to which the public has open access.

#### Legible London scheme

A new signage scheme which aims simplify pedestrian movement around London.



- 8.3 This section includes guidance for the design and layout of streets and public spaces including:
- quality of the public realm;
  - ease of pedestrian movement;
  - street furniture;
  - footpaths that are not alongside roads,
  - our approach to shared surfaces; and
  - information on the Legible London scheme.

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

- 8.4 This guidance applies to planning applications that involve a change in the way that pedestrians access a site or move in and around the site, and also applications that change vehicle movements in a way that will affect pedestrians.
- 8.5 It should guide arrangements for pedestrians that arrive by car, public transport or bicycle, as well as those arriving on foot.

### **The design and layout of streets and public spaces**

#### **CAMDEN STREETSCAPE DESIGN MANUAL (2005)**

Provides useful guidance for those who are planning the design and layout of streets and public spaces. The manual sets out the Council's detailed expectations for street works in the borough, addressing issues such as responding to local character, footway design and materials, and street furniture.

### **General principles**

- 8.6 We will seek improvements to streets and spaces to ensure good quality access and circulation arrangements for all. This includes improvement to existing routes and footways that will serve the development. Key considerations informing the design streets and public spaces include the following:
- Camden Streetscape Design Manual;
  - ensuring the safety of vulnerable road users, including children, elderly people and people with mobility difficulties, sight impairments, and other disabilities;
  - maximising pedestrian accessibility and minimising journey times;
  - providing stretches of continuous public footways without public highway crossings;
  - linking to, maintaining, extending and improving the network of pedestrian pathways;
  - maximising pedestrian safety by providing adequate lighting and overlooking from adjacent buildings;
  - taking account of surrounding context and character of area

- providing a high quality environment in terms of appearance, design and construction, paying attention to Conservation Areas, and using traditional materials (such as natural stone or granite setts) where appropriate,
- use of paving surfaces which enhance ease of movement for vulnerable road users; and
- avoiding street clutter and minimising the risk of pedestrian routes being obstructed or narrowed, e.g. by pavement parking or by street furniture.

### **Ensuring high quality public spaces**

- 8.7 The Core Strategy seeks to ensure that new development contributes to the creation of attractive, clean and well-maintained public places (see Policy CS14). It is essential that new streets and public spaces integrate with surrounding spaces and links, and are designed and built to a high standard, including through the use of good quality materials. The government's Manual for Streets provides useful guidance on achieving successful public spaces, and Camden's Streetscape Design Manual sets out guidance on how to ensure works contribute to local character and distinctiveness.
- 8.8 Where developments generate the need for works to road, highways and adopted public spaces, these should be funded by the developer (see CPG8 Planning obligations for transport provision) but carried out by the council in order to ensure consistent high standards of implementation and materials in streets and public spaces. In line with policy DP21 of the Camden Development Policies, all new pedestrian areas and footpaths are required to be constructed to a standard that is considered appropriate for adoption by the relevant Highway Authority.

#### **Street clutter**

Excessive use of road signs, bollards and lampposts leading to an untidy street environment.

### **Ease of pedestrian movement**

- 8.9 Footways should be wide enough for two people using wheelchairs, or prams, to pass each other. We seek to maximise the width of footways wherever possible. The Camden Streetscape Design Manual sets out minimum widths for different kinds of footways.

#### **Wayfinding**

The process of navigating or defining a path through an environment.

- 8.10 Policy DP21 of the Camden Development Policies document states that we will expect works affecting highways to avoid unnecessary street clutter. Design of footways should not include projections into the footway, unnecessary and cluttered street furniture or other obstructions. Any minimum standards for footway widths should not be used to justify the provision of unnecessary street clutter or reduction in footway width.



The Council will generally resist proposals that involve the opening of doors into footways as they raise safety concerns, and can obstruct pedestrians.

- 8.11 Footways should be designed with frequent and convenient road crossing points for pedestrians. The detailed design of edges, crossings and gradients should take into account the need for the maintenance of minimum pavement widths, ease of movement and wayfinding, and appropriate measures for those with visual impairments and mobility difficulties. The Camden Streetscape Design Manual and DETR 'Guidance on the use of Tactile Paving Surfaces 1998' provide useful guidance which should be used to inform the design of edges, crossings and gradients.

#### **Tables and chairs**

- 8.12 The Council will sometimes licence the placing of tables and chairs on the footway in association with adjacent cafes and similar uses. The area where tables and chairs may be placed must be designated and must not interrupt the area of footway for pedestrian movement. The licence will specify permitted hours, after which the removal of tables and chairs will generally be required. Further guidance on tables and chairs is provided in CPG5 Town centres, retail and employment.

#### **Lighting, signage and street furniture**

- 8.13 Footways should be well lit and well signed, but with care to avoid light pollution and obstructions. Wherever possible, lighting and signs should be placed on buildings or existing street furniture to minimise footway clutter. Please also see paragraphs 7.17 to 7.22 on Legible London below.
- 8.14 The installation of seating, bus shelters, litter bins and cycle parking is encouraged in association with new footways provided that it will improve the pedestrian environment, and the use of sustainable modes of transport. However, they should be positioned so they do not interrupt the minimum area of footway designated for pedestrians. If possible, cycle stands (and cycles parked at them) should be wholly clear of the footway.

#### **Footpaths that are not alongside roads**

- 8.15 Footpaths independent of roads can be beneficial in terms of directly following the most direct routes for pedestrians and creating pleasant environments. However, great care is needed to provide security for pedestrians and discourage anti-social behaviour. Designs should consider:
- lighting;
  - natural overlooking from adjacent buildings;
  - maintaining visibility over the full stretch of the route between roads;
  - the appropriateness of planting; and

- avoiding features that could conceal assailants.

### **Pedestrian and vehicle shared surfaces**

- 8.16 Policy DP17 of the Camden Development Policies states that we will seek shared surfaces in appropriate circumstances and where it will be safe for all users. Safety and accessibility for all will be examined thoroughly in any shared surface proposal.

#### **Shared surface**

A highway where distinction between pedestrian and vehicle areas has been removed or reduced and sends a strong signal that the whole of the highway space is open equally to all users.

- 8.17 Where shared surfaces are used, a combination of other traffic management measures should also be used to reduce vehicle speeds to 5-10 mph. Measures to reduce vehicle speeds should not limit visibility for pedestrians and vehicles, and must not prejudice safety. Further measures to promote safety include
- the removal of parked vehicles from the shared surface to avoid potential conflicts with children at play; and
  - provision of clear routes and surface textures to assist orientation of people with visual impairments.

### **Legible London wayfinding signage**

- 8.18 Legible London was set up by Transport for London (TfL) in partnership with London boroughs to create a standard pedestrian wayfinding and signage system for central and inner London. It is a map-based system which gives users a good understanding of the surrounding area and encourages them to choose their own route to a specific destination.
- 8.19 Legible London signage is supported in Camden's Core Strategy Policy CS11 as a key element of Camden's approach to promoting walking in the borough. It has also been adopted by other London boroughs and thus provides consistent pedestrian signage across central and inner London.
- 8.20 The Legible London standard has been adopted by Camden and all new signs on the public highway should be of a Legible London type. The Council will also seek Legible London signage on private land, where appropriate.
- 8.21 TfL's Legible London programme currently covers the Central London area and we will extend the Legible London scheme throughout the borough, prioritising key destinations and busier areas, such as our town centres (see Core Strategy Policy CS11 paragraph 11.11). We will seek on-site provision of Legible London signage in these areas as appropriate, and on developments that contain:
- key routes to or through the site;

- decision points, arrival points and places where pedestrians are likely to gather;
  - complex spaces and areas outside civic spaces and public buildings.
- 8.22 Where relevant, sign types and quantities should tie into any relevant area strategies produced by the Council, in partnership with TfL.
- 8.23 As well as on-site provision, developments will also be expected to provide contributions to the Legible London in other locations, where appropriate, in order to mitigate the increased level of activity their development generates (see transport section of CPG8 Planning obligations).

#### **Highway authority approval**

- 8.24 Works to streets and public spaces also require separate approval from the relevant highway authority (usually Camden council). You are advised to contact our Highways department as soon as possible to discuss the approach to and proposed works to streets and public spaces.

#### **Further information**

- 8.25 In addition to Camden's Core Strategy, Development Policies, the Camden Streetscape Design Manual and other sections in this guidance, reference should be made to the following guidance:
- Manual for Streets, DfT, 2007
  - Residential roads and footpaths: layout considerations – DfT Design bulletin 32 (2nd edition), HMSO 1992
  - Guidance on the use of tactile paving surfaces, DETR 1998 - this can be viewed on the 'transport infrastructure, pedestrians, wheelchair and scooter users' pages in the 'access for disabled people' section of: [www.dft.gov.uk](http://www.dft.gov.uk)

## 9 Cycling facilities

### KEY MESSAGES

This section includes guidance on:

- The implementation of our minimum cycle parking standards for new development;
- The design and layout of cycle parking; and
- Cycle hire and cycle stations.

9.1 This section provides guidance on meeting cycle parking standards in an effective way, so that cycle parking is convenient and secure, and users of a development are more likely to use bicycles to travel to and from the site.

9.2 It relates to Core Strategy Policy CS11 – *Promoting sustainable and efficient travel* and policies DP17 – *Walking, cycling and public transport* and DP19 – *Parking standards and limiting the availability of parking* of the Camden Development Policies. It should be read in conjunction with Development Policies Appendix 2 – Parking standards.

### When does this apply?

9.3 This guidance applies to:

- Applications which involved the creation of one or more additional dwellings;
- Applications which proposed additional floorspace of 500 sq m or more; and
- Applications which are likely to significantly increase the demand for people to cycle to the site.

### How do we implement our cycle parking standards?

9.4 Numerical standards for cycle parking spaces are introduced by policy DP18 of the Camden Development Policies, and set out in detail in Development Policies Appendix 2. These standards are applied at a threshold of 500 sq m in most cases. Throughout the standards, the stated number of spaces relates to the number of bicycles to be accommodated, not to the number of stands.

9.5 Where a development crosses the threshold, requirements apply to the entire floorspace, not only the floorspace above the threshold. For example, at a new leisure development, 1 visitor cycle parking space per 250 sq m is required from a threshold of 500 sq m. This means that no requirement applies to a facility of 400 sq m, but 4 visitor spaces are required for a facility of 1,000 sq m.

9.6 Thresholds and standards are given as a gross floor area (GFA) relating to the development as a whole, and are not intended to be applied

separately to individual units where a development is subdivided into smaller units. Thus, space for cycles may be required for small premises (under 500 sq m) which form part of a larger development.

- 9.7 Table 6.3 of the London Plan sets out additional cycle parking standards and states that additional cycle parking provision will be required for larger (C3) residential units.

### Location, design and layout of off-street cycle parking

- 9.8 Cycle parking should be provided off-street, within the boundary of the site. Cycle parking needs to be accessible (in that everyone that uses a bike can easily store and remove a bike from the cycle parking) and secure (in that both wheels and the frame can easily be locked to the stand). Security is a critical concern in the location, design, enclosure and surveillance of all cycle parking. The table below provides detailed guidance on the location, design and layout of cycle parking for various groups of cyclists.

### Location of off street cycle parking

#### General

- Cycle parking outside buildings should be positioned near entrances and where frequent surveillance is possible. For short stays, the parking should be sited within 25 metres of building entrances. For stays of over an hour, the parking should be sited within 50 metres of building entrances.
- All cycle parking, including all parts of the parked cycles, should be clear of routes needed for pedestrian movement.
- The route to cycle parking from street level should be step free. cycle parking inside buildings should be at the entrance level of the building or accessible by a ramp or lift from street level that can accommodate a bike.

#### Parking for visitors

Parking for visitors should be clearly visible or clearly signed from the public highway, and should be near building entrances

#### Parking for employees (and other long stay parking)

Parking for employees (and other long stay parking) should be provided either within the building, or otherwise protected from the weather. Consideration should be given to providing lockers and showers for cyclists. For larger development this would be expected and would be a requirement of a Travel Plan (see section 2 of this guidance concerning Travel Plans).

#### Parking for residents

Parking for residents should be within the building. Parking for a resident may take the form of a space within an individual dwelling provided that the space is close to the door of the dwelling, and access to the dwelling is level, or by a ramp or lift that can accommodate a bike.

## Design and layout of cycle parking: Sheffield and “Camden” cycle stands

The Council recommends the use of either “Camden” or Sheffield for the provision of off-street cycle parking, as they meet the Council’s requirements in terms of accessibility and security, provided they are laid out correctly.

- The “Camden” stand is a new form of Sheffield Stand, which is now used for all new cycle parking installed on Camden’s public highway. Developers are encouraged to use it in place of the Sheffield stand, although the Sheffield stand is still acceptable. The Council’s Public Realm and Transport team can advice on purchasing “Camden” stands as they are not as widely available as the Sheffield stand.
- The Sheffield Stand is the most common type of cycle stand used in the public highway. It is recommended for use along with Josta two-tier cycle parking;

Annex 1 provides more detailed guidance on the design and layout of “Camden”, Sheffield and Josta stands.

We are willing to consider other forms of cycle parking, however you must meet our accessibility and security requirements, details of which can be obtained from the Council’s Public Realm and Transport team. Generally, designs that require cycles be lifted into place or provide insufficient opportunity to lock the cycle will not be acceptable.



### The London Cycle Hire Scheme

- 9.9 The London Cycle Hire Scheme is a public bicycle sharing scheme for short journeys in and around central London. Users can pick up a bike from a docking station, use it for short journeys, then drop it off at any docking station, ready for the next person.
- 9.10 Whilst the cycle hire scheme is currently focused around central London, the Mayor of London is investigating its expansion. The Camden Core Strategy states that we will seek to ensure that the scheme is extended to key destinations across the borough, including our town centres (see Core Strategy paragraph 11.13).
- 9.11 Where appropriate, developments close the area covered by the London Cycle Hire Scheme will be expected to contribute towards the scheme,

where justified as a result of increased trips generated. Contributions could include:

- a financial contribution towards cycle hire facilities. The amount sought will be based on the number of additional trips that are generated by the scheme;
- provision of space on-site to accommodate new cycle hire docking stations, in larger developments where there is space and the location is suitable. Transport for London (TfL) is producing a set of guidance for developers regarding specifications and design requirements for docking stations due to be released in 2011.

9.12 Contributions sought will relate both to the individual impact of a scheme and to any cumulative impact of a number of schemes in the same area.

### **Cycle stations**

9.13 Cycle stations provide a secure managed area for cycle parking. The Camden Core Strategy promotes the provision of cycle stations as part of an effort to increase the availability of cycle parking in the borough (see paragraph 11.13 of the Core Strategy), and we intend to create a network of publically accessible cycle stations across the borough.

9.14 We will seek the provision of cycle stations in locations where it will be possible to attract a sufficient number of users. Suitable locations include:

- town centres and the central London area;
- transport interchanges;
- large commercial developments;
- residential areas - linked to new and existing residential development of a suitable scale; and
- larger health and education facilities.

9.15 Where developments generate an increased level of activity they will be expected to provide contributions towards the provision and maintenance of nearby cycle stations, in order to mitigate the effects of the increased number of journeys.

9.16 We will also seek on-site provision of cycle stations as part of larger developments in suitable locations. On-site provision of cycle stations can incorporate a development's cycle parking requirements for visitors (as set out in our parking standards), but should also include extra provision for the wider public. Parking provision for employees and residents of a development, as set out in our parking standards, should be provided separately in order to ensure that they retain the appropriate number of spaces to meet the demand that they generate.

### **Design of cycle stations**

9.17 As a minimum, cycle stations should incorporate indoor, sheltered standard cycle parking (e.g. Camden or Sheffield type cycle stands) with

controlled access to the indoor area, and lighting. Cycle stations can incorporate a variety of other features including automated cycle locks, changing facilities, lockers, toilets and showers. Access to and from the cycle station by bike must be safe and convenient and accounted for within the space.

9.18 The Camden Cycle Stations Programme - Review of Best Practice (March 2009) provides information on best practice in the provision of cycle stations. Features that contribute to a successful cycle station include:

- Being located not more than 100m from the target destination, with shorter stays requiring shorter distances;
- Good surveillance by staff, other users and passers-by.
- Effective maintenance and management
- Clear and unambiguous signing to and within the cycle station.

### **Further information**

9.19 In addition to the guidance provided in Annex 1 below (which includes details on the layout of off-street cycle parking), reference may also need to be made to the Camden Streetscape Design Manual. The manual contains dimensions for on-street cycle parking and the widths required for unobstructed pedestrian routes.

9.20 Other supporting documents include:

- Forthcoming TfL Design and specification of cycle hire scheme
- Forthcoming TfL Guidance on Cycle Stations
- Camden Cycle Stations Programme - Review of Best Practice (March 2009)

9.21 London Cycle Network Design Manual (London Cycle Network Steering Group, March 1998)

### **Annex 1 – Sheffield Stand Cycle Parking**

9.22 This Annex describes in detail how to lay out Sheffield stands. It also can also be applied to the layout of “CaMden” stands.

9.23 The "Sheffield Stand" refers to a common design of cycle parking made from a tubular steel loop, approximately 50mm to 75mm in diameter, that is fixed to the ground (either bolted through a baseplate or set in concrete). Each Sheffield Stand can accommodate two bicycles, one either side, provided there is sufficient clearance next to the stand and sufficient circulation space so all cycle parking spaces can be accessed

9.24 The CaMden Stand is similar to the Sheffield Stand but is in the shape of a rounded “M” rather than a simple loop. This is designed to encourage users to lock both wheels and the frame to the stand, rather than just the top tube / frame.



Figure 3. Sheffield Stand Elevation

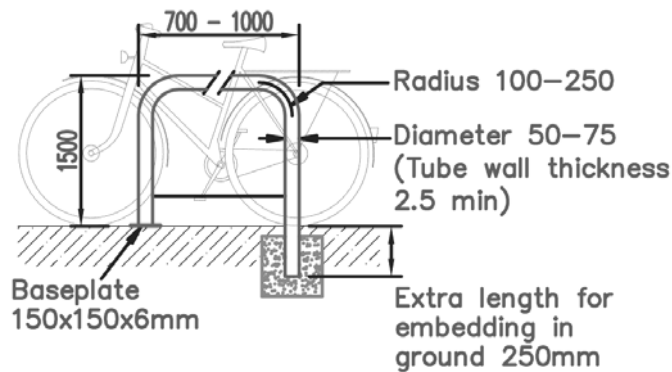
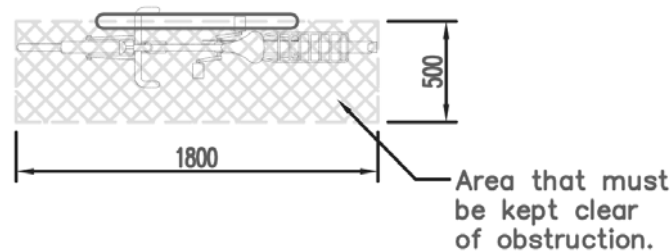
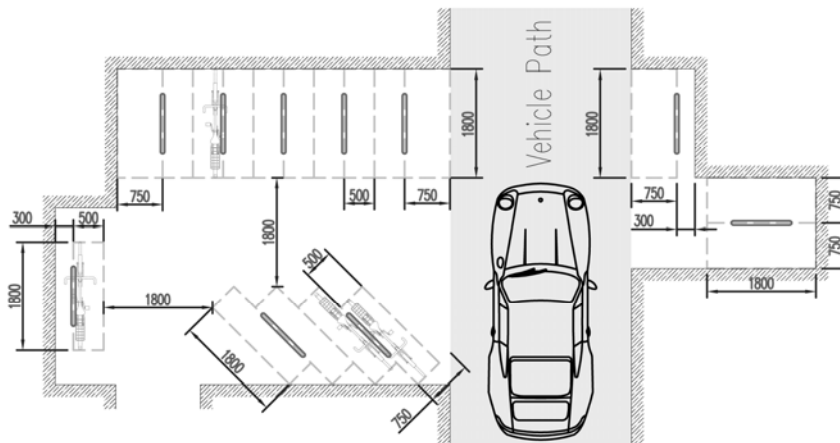


Figure 4. Sheffield Stand Plan



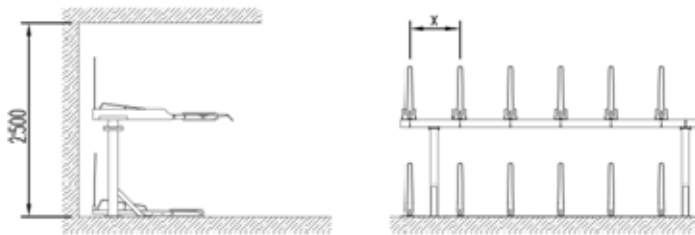
- 9.25 For adjacent stands, an area of at least 1800mm by 500mm next to the stand (measured from the centre line of the tube), must be kept clear for each cycle parking space to allow room for the cycle and working space for locking the bike to the stand. However, if a stand is next to a physical obstruction, such as a wall or a vehicular path, there must be at least 750mm between the stand and the physical obstruction to enable both sides of the stand to be used. If a stand is to be placed close to a wall or other physical obstruction so that only one side of it can be used (i.e. only one cycle can be locked to it), there must be at least 300mm between the stand and the physical obstruction.
- 9.26 Aisles around the cycle store must be at least 1800mm in width. An example cycle store showing various layout options is shown below. Note that the area to be kept clear does not actually have to be marked on the ground, but is shown in outline for clarity.

Figure 5. Cycle stand siting

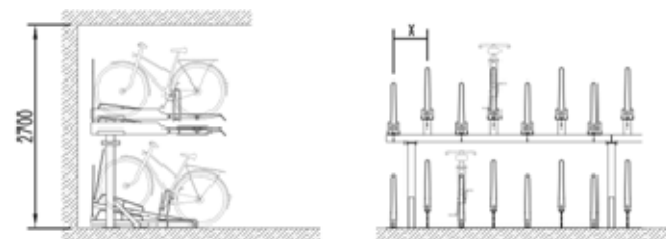


### Josta Two-tier Cycle Parking

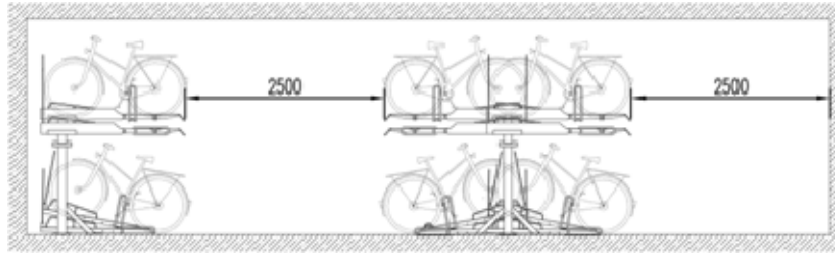
- 9.27 The Josta two-tier cycle parking system (or similar) is generally able to accommodate approximately twice as many cycles per square meter of floor space as Sheffield stands. It also still meets the Council's requirements for accessibility and security, but requires a ceiling height of at least 2500mm.
- 9.28 With a ceiling of at least 2500mm the stands can be placed 650mm apart, i.e.  $X = 650\text{mm}$  in the diagram below.



- 9.29 With a ceiling of at least 2700mm the stands can be placed 400mm apart, i.e.  $X = 400\text{mm}$  in the diagram below.

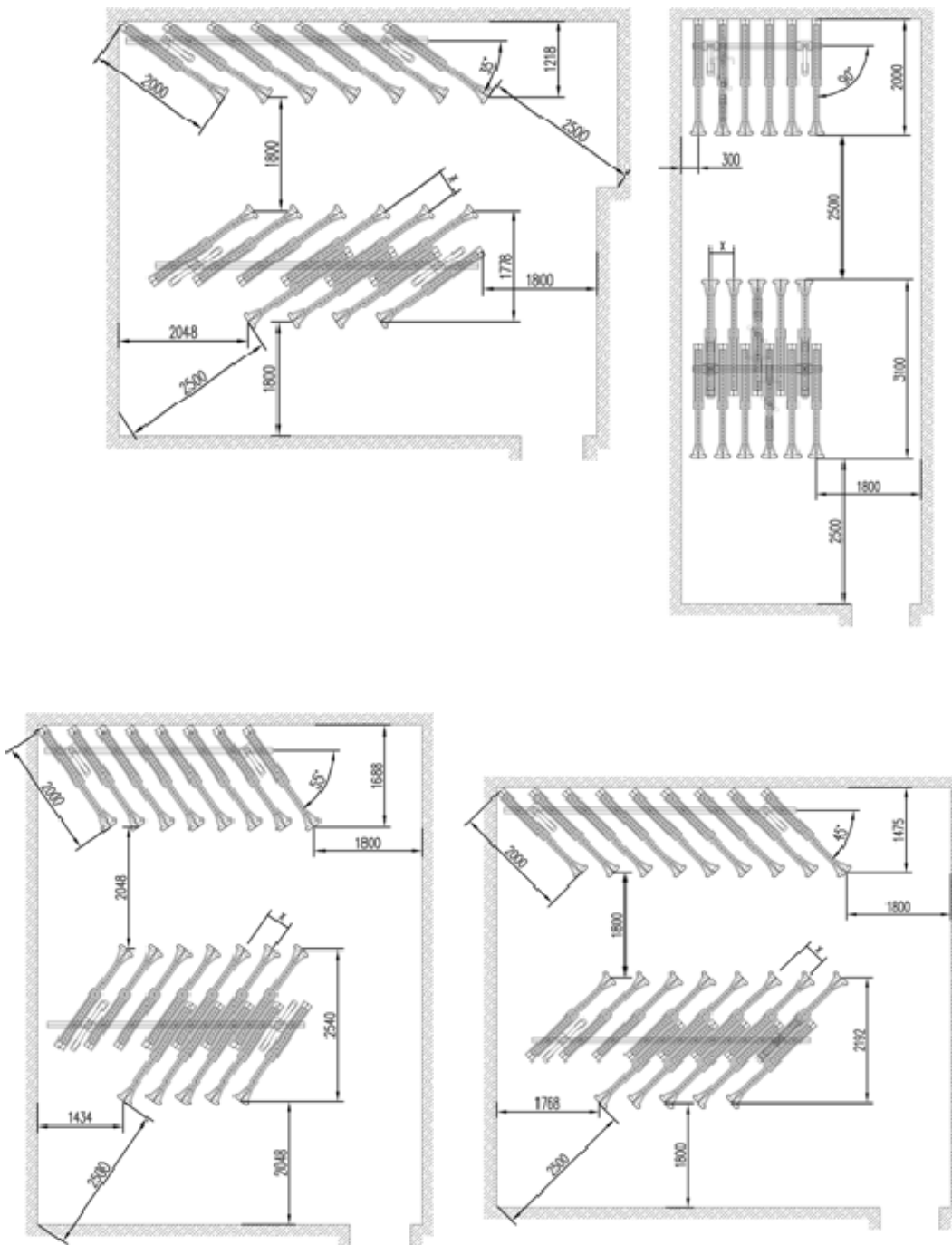


- 9.30 In order to enable the top tier to be used, at least 2500mm of clearance in front of the stand, measured on a line at the same angle at which the top tier stands are extended (see diagrams below), is required between rows of stands, walls or other obstructions.



- 9.31 The Josta stands can be arranged at different orientations (angles) provided there is 2500mm of clearance in front of the rack to remove cycles from the top tier (as described above) and aisles around the cycle store at least 1800mm in width. Examples, with minimum distances are shown below. "X" indicates the spacing between stands, which depends on the ceiling height as described on the previous page.

Figure 6. Josta Stand minimum siting dimensions



## 10 Minicab offices

### KEY MESSAGES

- The Council will seek to minimise any impacts caused by minicab offices relating to emissions, noise, highway and traffic problems, and community safety
- The Council will resist minicab offices in locations which adjoin residential accommodation

10.1 This section provides guidance on the provision of minicab offices in Camden, setting out the main issues which should be considered in order to minimise their impact, and the most appropriate locations for them.

10.2 It relates to policy DP12 - *Supporting strong centres and managing the impact of food, drink, entertainment and other town uses* of the Camden Development Policies.

### When does this apply?

10.3 This guidance applies to all applications concerning minicab hire offices, including both change of use applications and proposals for extensions and internal and external alterations to existing premises.

10.4 In some circumstances mini-cab offices fall within the B1a use class, specifically where cabs are controlled remotely from a small office. For a mini-cab office to be considered within such a use the premises would have no defined frontage distinct from the existing office accommodation and the presence of the mini-cab office would not be advertised outside. The intent therefore would be to remotely control drivers and not to attract passing trade to come into the premises to order cabs. There would be no element of taxis ranking up, whether formally or informally, to pick up customers from the premises.

### How should minicab offices be provided?

10.5 Minicabs make a valuable contribution to the transport needs of Camden's residents and workers and provide new business opportunities and employment. However, we must balance the needs of minicab businesses with the need to minimise traffic congestion and protect residents from undue disturbance, particularly as minicab offices tend to operate for 24 hours a day. Particular issues that may arise from minicab offices are emissions and noise, highway and traffic problems, community safety and the fear of crime.

### Location

10.6 Policy DP12 in Camden Development Policies acknowledges that town and neighbourhood centres are generally the most appropriate location for minicab offices although we will carefully consider their potential

impact when assessing planning applications to make sure that they do not harm the centre or the amenity of neighbours.

- 10.7 We will resist minicab offices in locations which adjoin residential accommodation.
- 10.8 We welcome the use of radio-controlled vehicles since this reduces the need for drivers to return to the office for each fare which, in turn, should reduce any disturbance to nearby residents and minimise traffic congestion.

### **Extensions**

- 10.9 Should you wish to extend an existing minicab office, or change its appearance you may need to apply for planning permission, and you should contact the Council to check. If the building is listed you may need listed building consent for alterations both inside and outside. Further advice on listed buildings is contained within CPG1 Design (Heritage).
- 10.10 Extensions should not occupy car parking or access areas. Where this is proposed you will be required to reprovide parking and provide a new access. Extensions or alterations that make access for vehicles dangerous will not be permitted. Further general guidance is provided in CPG1 Design (Extensions, alterations and conservatories).

### **Additional controls**

- 10.11 The following additional controls may apply to minicab offices:

#### **Off-street parking**

- 10.12 Minicab offices should, where possible, provide off-street car parking for drivers visiting the office. This parking should be located within or in close proximity to the office site.

#### **Advertisements and shopfronts**

- 10.13 Minicab offices will be subject to the same controls on advertising and shopfronts as other town centre uses. You should refer to CPG1 Design for detailed guidance on Advertisements, signs and hoardings and Shopfronts.

#### **Soundproofing**

- 10.14 Soundproofing may protect adjoining premises from noise disturbance. This is particularly important where minicab offices include waiting rooms for customers. Internal soundproofing cannot, however, reduce outdoor noise from car doors, slamming, engines, horns etc or alleviate the disadvantages of an inappropriate location.

### **Satellite dishes and antennae**

- 10.15 Satellite dishes or radio antennae may be required and this equipment should be away from the view of nearby residential properties or public areas. If the building is listed, or in a conservation area, special care is required to ensure that the equipment does not affect the traditional character of the building or its setting. Additional guidance is contained within CPG1 Design (Heritage and Building services equipment). Please note that satellite dishes and radio antennae may require permission from the council before they are erected.

### **Access**

- 10.16 If customers can visit your offices you should try to ensure that it is accessible to all members of the public. Further guidance on the measures that could be introduced to enable this is contained within Camden Planning Guidance on access for all.

### **Marshalled Taxi Ranks**

- 10.17 The Council is keen to introduce marshalled taxi ranks in busier nightlife areas such as Camden Town, in order to ensure the safe loading of passengers into taxis and to help reduce any alcohol-related problems which may arise in such locations. Should a managed taxi rank be introduced, community safety will be a key issue and we will encourage the installation of additional lighting, security cameras and regular police patrols to monitor the area.

**Index**

Car clubs .....	31	Electric charging points .....	32
Car free and car capped development.....	25	Legible London .....	45
Car parking (on-site).....	29	Minicab offices .....	56
Cycle hire scheme.....	49	Servicing management plans .....	21
Cycle parking.....	47	Street furniture .....	44
Cycle stations .....	50	Streets and public spaces .....	41
Cycling facilities.....	47	Transport Assessments.....	7, 8
Disabled (parking) .....	28	Travel plans .....	13
		Vehicle access.....	35





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Camden Planning Guidance

# Amenity

March 2018



# CPG Amenity

1	Introduction .....	3
2	Overlooking, privacy and outlook.....	4
3	Daylight and Sunlight .....	7
4	Artificial Light.....	16
5	Construction Management Plans.....	21
6	Noise and vibration.....	27
7	Wind and micro-climate.....	35
8	Contaminated land .....	40

# 1 Introduction

## What is Camden Planning Guidance?

- 1.1 The Council has prepared this guidance to support the policies in the Camden Local Plan 2017. It is a formal Supplementary Planning Document (SPD), which is therefore a “material consideration” in planning decisions.
- 1.2 This document should be read in conjunction with, and within the context of the relevant policies in the Camden Local Plan 2017.

## Amenity in Camden

- 1.3 Standards of amenity (the features of a place that contribute to its attractiveness and comfort) are major factors in the health and quality of life of the borough’s residents, workers and visitors and fundamental to Camden’s attractiveness and success. Camden’s Inner London location, the close proximity of various uses and the presence of major roads and railways means that amenity is a particularly important issue within the borough.

## What does this guidance cover?

- 1.4 This guidance provides information on key amenity issues within the borough and includes the following sections relating to Local Plan Policy A1 – Managing the impact of development:
  - Overlooking, privacy and outlook
  - Daylight and sunlight
  - Artificial light
  - Construction management plans
  - Noise and vibration
  - Wind and micro-climate
  - Contaminated land.
- 1.5 This document replaces the above sections in CPG 6 Amenity (adopted 2011).

## 2 Overlooking, privacy and outlook

### KEY MESSAGES:

- Developments should be designed to protect the privacy of occupiers of both existing and proposed dwellings.
- Mitigation measures should be included to reduce overlooking
- Public spaces benefit from overlooking as natural surveillance

2.1 This guidance relates to the application of Policy A1 – Managing the impact of development and aims to ensure that the potential impact of development on the privacy and outlook of neighbouring properties and their occupiers is fully considered. This chapter contains guidance on the following:

- Overlooking and privacy
- Separation between buildings
- Mitigation measures
- Balconies and roof terraces
- Outlook

### Overlooking and privacy

- 2.2 Interior and exterior spaces that are overlooked lack privacy, which can affect the quality of life of occupants. The Council will therefore expects development to be designed to protect the privacy of the occupants of both new and existing dwellings to a reasonable degree. Therefore, new buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking. The extent of overlooking will be assessed on a case-by-case basis.
- 2.3 The places most sensitive to overlooking are typically habitable rooms and gardens at the rear of residential buildings. For the purposes of this guidance, habitable rooms are considered to be residential living rooms; bedrooms and kitchens. The area of garden nearest to the window of a habitable room is most sensitive to overlooking.

### Separation between buildings

- 2.4 To ensure privacy, it is good practice to provide a minimum distance of 18m between the windows of habitable rooms in existing properties directly facing the proposed (either residential or non-residential) development, assuming a level topography. In instances where building heights, design or topography mean that opportunity for overlooking would be increased, it is advisable to increase this separation distance. The 18m should be measured between the two closest points on each building (including balconies). See Figure A below.

**Figure A: 18m separation distance measurement**

- 2.5 Where there is an existing street or public space, this space is considered to already provide an adequate separation between properties and so the 18m guideline will not apply. However, care should be taken to reduce overlooking from the street into habitable rooms near to a street or public space, particularly bedrooms. Public spaces and communal areas will benefit from a degree of overlooking as this can increase natural surveillance of these spaces and therefore act to deter crime.
- 2.6 There may also be instances however, where the historic character of the immediate area is composed of buildings positioned less than 18m apart and it will be appropriate to reflect this in the design of development schemes.

### **Mitigation measures**

- 2.7 They may be circumstances where a separation distance of 18m cannot be achieved. In these instances, mitigation measures should be incorporated to ensure overlooking is reduced to an acceptable level.
- 2.8 For example, buildings could be positioned at an angle to each other so it is less likely that people will be able to see directly into neighbouring habitable rooms and gardens of neighbouring buildings. Careful consideration could also be given to the layout of windows, using obscure glazing to prevent overlooking if necessary. It will however not be acceptable for habitable rooms to have windows glazed exclusively with obscure glass however.
- 2.9 Soft landscaping, such as the use of trees and shrubs can act as privacy screens. Where soft landscaping is proposed as the principle method of screening, applicants should demonstrate that the extent of planting proposed is sufficient to ensure that this will result in reasonable levels of privacy all year.
- 2.10 Carefully sited permanent domestic structures, such as solid fences, pergolas, garden sheds, bin stores, and cycle storage, can also act as privacy screens. In instances where mitigation is considered necessary to ensure privacy, but has not been provided adequately within development proposals, the Council will consider the use of planning conditions to secure mitigation measures. This could include conditions requiring:
- the installation of obscure glazing;
  - restrictions on openable windows; and
  - restrictions on inserting new windows into blank walls.

### **Balconies and roof terraces**

- 2.11 Although balconies and roof terraces can provide amenity space for flats that would otherwise have little or no exterior space, they also have the potential to increase

opportunities for overlooking. Balconies and roof terraces should therefore be carefully sited and designed to reduce potential overlooking of habitable rooms or gardens of neighbouring residential buildings. Conversely, residential buildings should also be designed so that new balconies and roof terraces do not suffer from an unacceptable degree of overlooking from existing developments, particularly when this is the only outdoor amenity space available to the new dwelling.

- 2.12 'Juliet' (or 'French') balconies are balconies that do not project far enough for an occupant to stand on. Where these are proposed, as the occupants using the balcony are still within the building, the extent of overlooking will be considered in the same way as would a normal window.

### **Outlook**

- 2.13 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. Particular care should therefore be taken if the proposed development adjoins properties with a single aspect. Any unpleasant features should be screened if possible, for example with permanent landscaping.
- 2.14 Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers. The location of bin or cycle stores, for example, should be carefully considered if they are in close proximity to windows or spaces used by occupiers.
- 2.15 It should be noted that the specific view from a property is not protected as this is not a material planning consideration.



### 3 Daylight and Sunlight

#### KEY MESSAGES:

- The Council expects applicants to consider the impact of development schemes on daylight and sunlight levels. Where appropriate a daylight and sunlight assessment should be submitted which should follow the guidance in the BRE's *Site layout planning for daylight and sunlight: A guide to good practice*.
- The 45 degree and 25 degree tests cited in the BRE guidance should be used to assess ('screen') whether a sunlight and daylight report is required.
- Levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.
- The Council may seek independent verification of sunlight and daylight reports if necessary.

3.1 The Council aims to protect the quality of life of occupiers and neighbours through Local Plan policy A1 Managing the Impact of Development, which seeks to ensure that development does not cause unacceptable harm to amenity, including in terms of daylight and sunlight. This guidance relates to daylight and sunlight levels and contains the following sections:

- What is daylight and sunlight?
- Assessing daylight and sunlight levels.
- What should daylight and sunlight reports contain?
- Flexible consideration of daylight and sunlight.
- Independent verification of daylight and sunlight reports.
- Other Considerations: Right to Light Legislation.

#### What is daylight and sunlight?

3.2 Levels of daylight and sunlight within buildings are important for amenity, health and well-being, for bringing warmth into a property and to save energy by 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.

3.3 In this context, daylight is considered to be the volume of natural light that enters a building to provide satisfactory illumination of internal accommodation between dawn and dusk. Sunlight refers to direct sunshine. Whereas levels of daylight are associated with illumination, sunlight is brighter and has potential to heat buildings. Overshadowing is an outcome of sunlight being blocked and is associated with the measurement of sunlight levels.

#### Assessing daylight and sunlight levels

3.4 Daylight and sunlight levels are affected by the location of a proposed development and its proximity to, and position in relation to, the windows in nearby properties.

3.5 In order to demonstrate that adequate levels of daylight and sunlight are being provided in accordance with Policy A1, the Council will expect applicants to submit daylight and sunlight reports informed by BRE's *Site layout planning for daylight and sunlight: A guide to good practice* (the 'BRE guidance').

- 3.6 The BRE guidance contains numerous tools, techniques and recommended standards relating to daylight and sunlight that are relevant to both minor and major developments. It is intended that this section be read in conjunction with the BRE guidance.

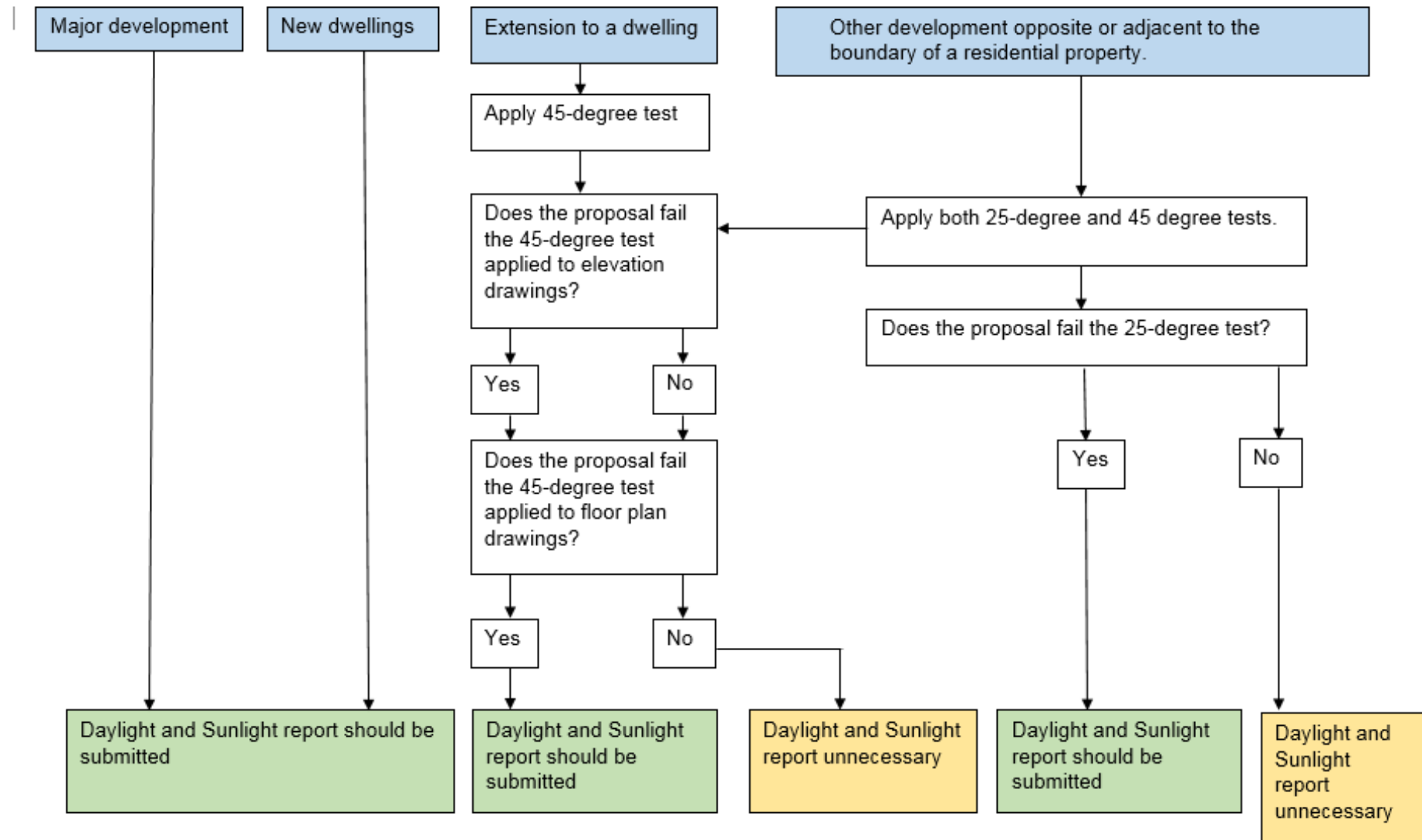
**When may daylight and sunlight reports be expected?**

- 3.7 Major developments and proposals for new dwellings are expected to provide daylight and sunlight reports.
- 3.8 To help determine whether a daylight and sunlight report is needed for other types of development, the Council will have regard to several tests, taken from the BRE guidance and quoted in this section for ease of reference. These are referred to as the 45-degree test and the 25-degree test.
- 3.9 Applicants are expected to use the 45-degree test and the 25-degree tests to screen their proposals to determine whether a sunlight and daylight report is required. The screening procedure is set out in Figure 1 below.

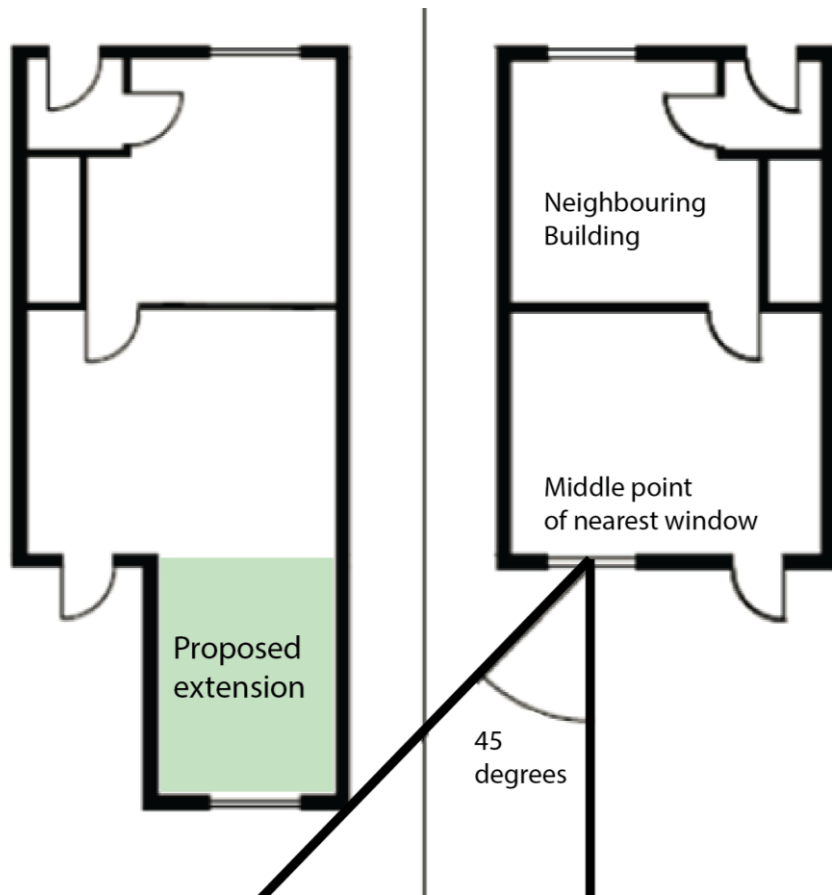
**45 degree test:**

- 3.10 The 45 degree test is an assessment of daylight and can be applied to developments that lie perpendicular (at a right angle) to a neighbouring property. It is most suited to minor developments, such as residential extensions. The test can be applied to both floor plan drawings (see Figures 2a and 2b below) and elevation drawings (Figures 3a and 3b).
- 3.11 When applied to floor plan drawings, the test involves drawing a 45-degree line from the middle of the nearest window from the existing development to the proposed development. If any part of the proposed development crosses the line, then there is potential for daylight to be affected.

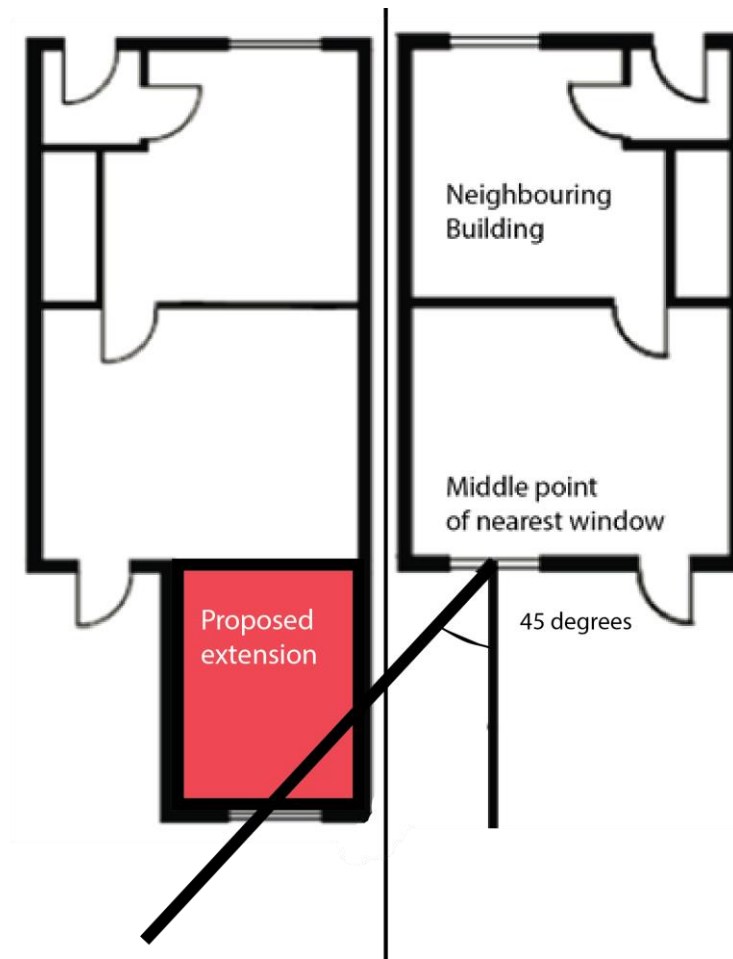
Figure 1: Daylight and sunlight report screening procedure



**Figure 2a: Proposed development passing 45-degree floor plan test**

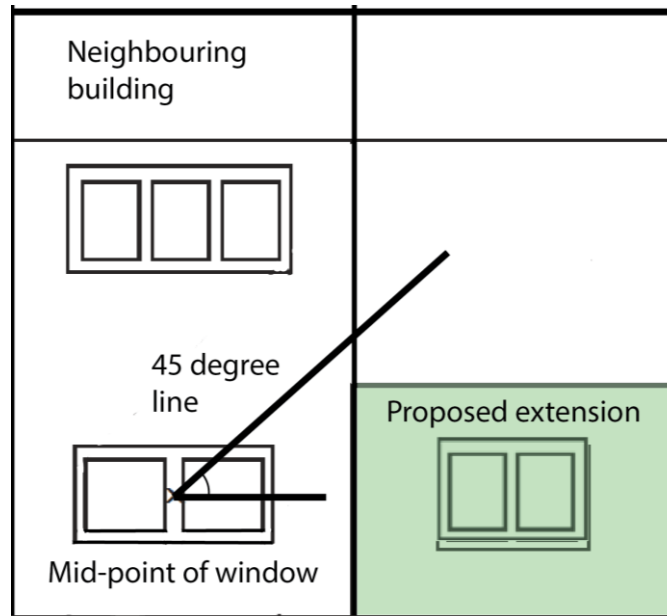


**Figure 2b: Proposed development failing 45-degree floor plan test**

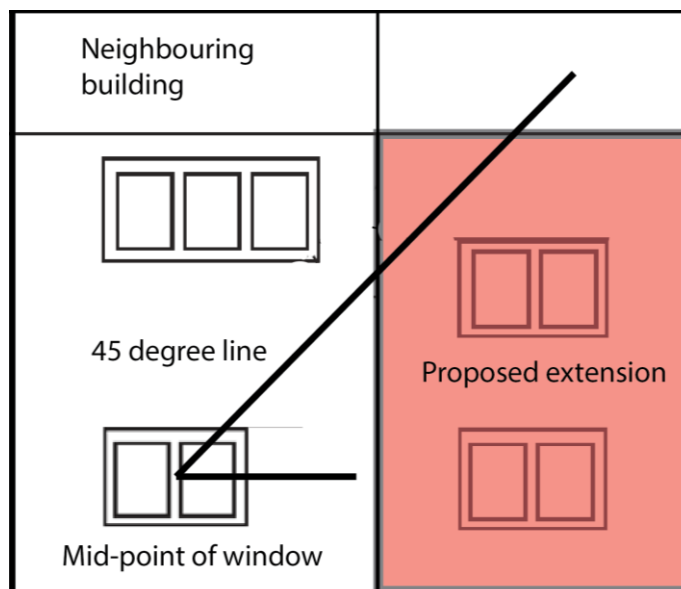


- 3.12 When applied to elevation drawings, again a 45-degree line is drawn from the mid-point of the nearest window of an existing property towards the proposed development. If any part of the proposed development crosses the line, then there is potential for daylight to be affected. See Figures 3a and 3b.

**Figure 3a: Proposed development passing 45-degree elevation test**



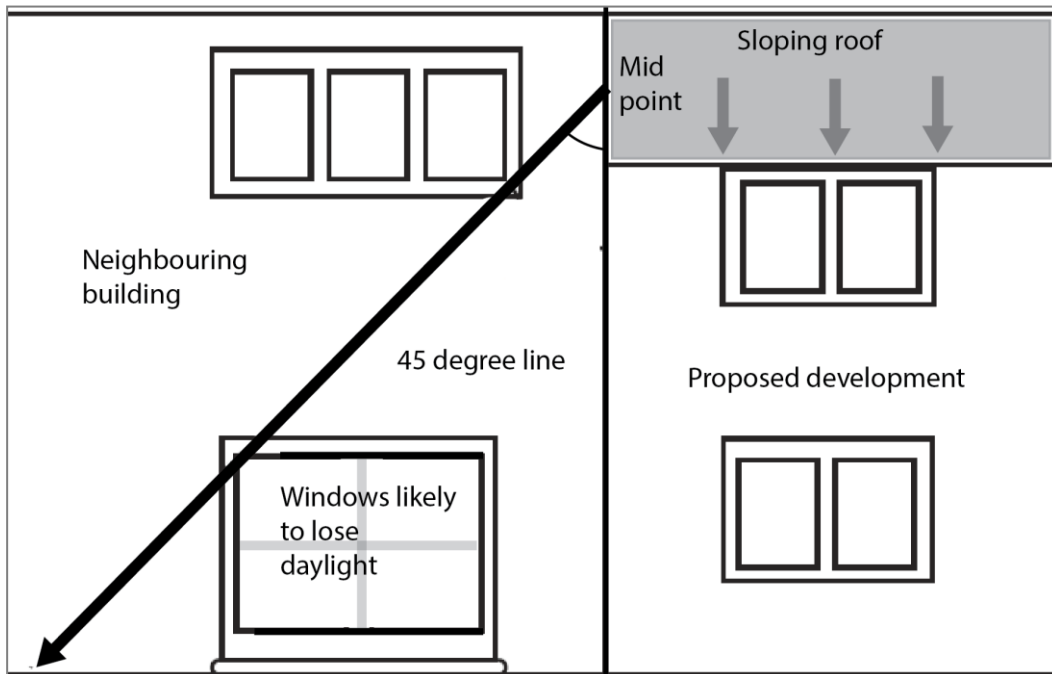
**Figure 3b: Proposed development failing 45-degree elevation test**



3.13 In applying this test however, two additional factors should be considered where relevant:

- Where the nearest window stretches from floor to ceiling height (a patio door for example), the BRE guidance states that point at which the 45 degree angle is measured should be 1.6m from the floor.
- Where a sloping roof is proposed, it is best to measure the 45-degree angle downwards from the mid-point of the roof slope. Windows lying underneath this line are likely to have experience loss of daylight. See Figure 3c.

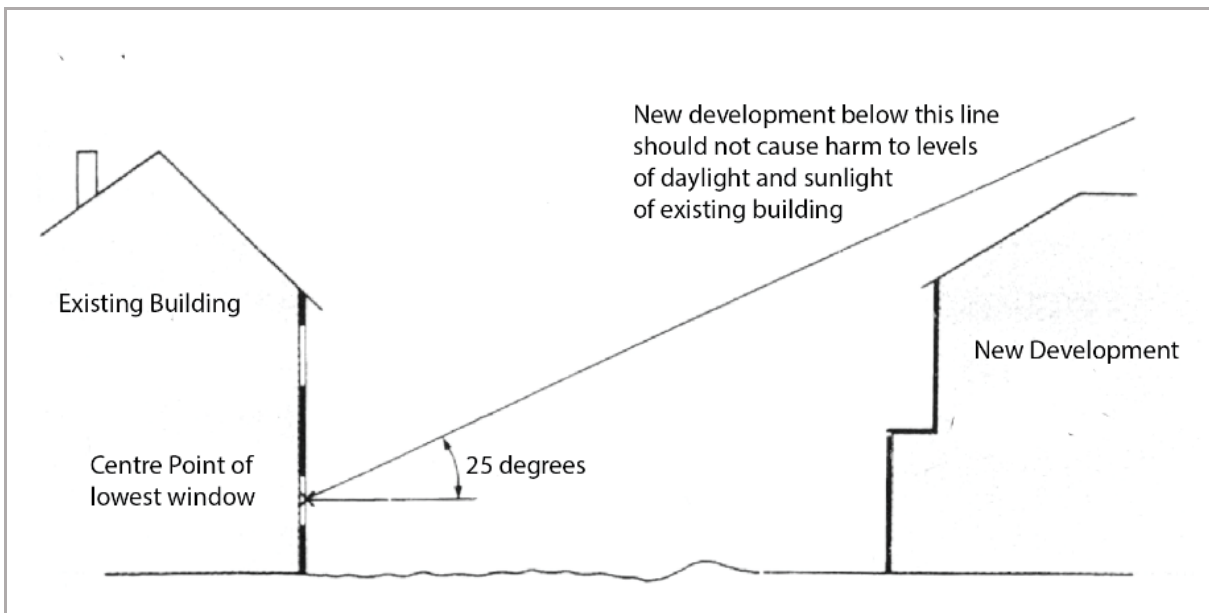
**Figure 3c: 45 degree test measured downwards from the mid point of sloping roof.**



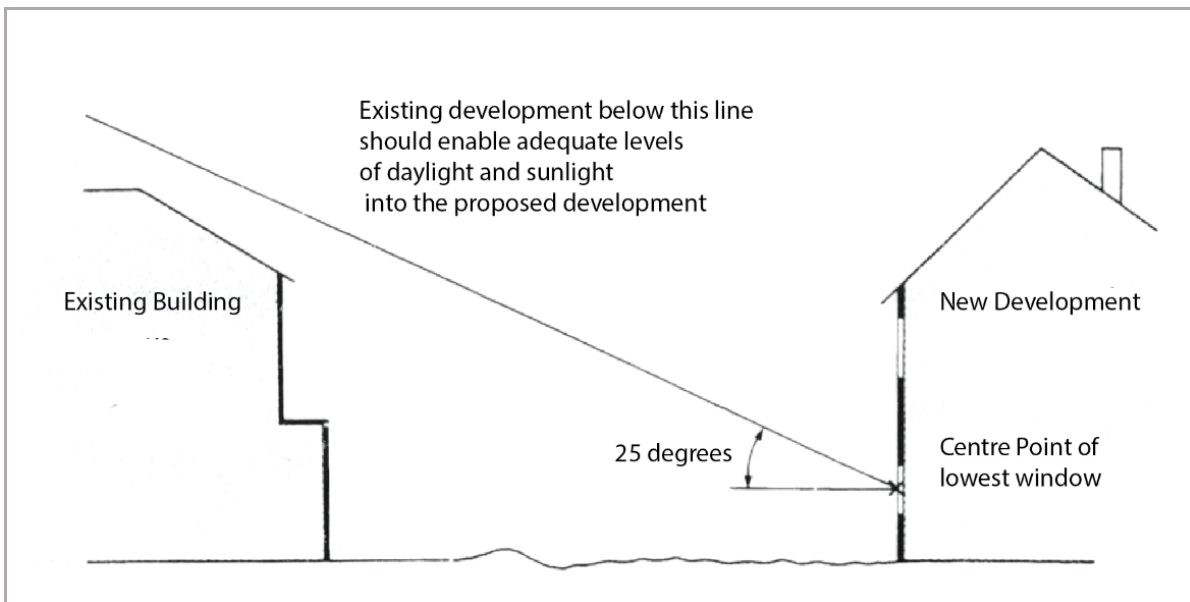
### 25 degree test

3.14 To assess the impact a proposed development on existing properties (see Figure 4a), a 25 degree line should be projected from the centre of the lowest window of existing residential properties opposite the proposed development. If the whole the proposed 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.

3.15 If the proposed development projects above the 25 degree line, the Council will expect the extent of the development's impact upon daylight and sunlight levels to be assessed in more detail through a daylight and sunlight report.

**Figure 4a: 25 degree rule from existing building**

- 3.16 The same principle can also be applied to determine whether the occupants of proposed residential developments are likely to receive adequate levels of daylight and sunlight. To assess this a 25-degree line is instead projected from the centre of the lowest window of each residential property within the proposed development. See Figure 4b.

**Figure 4b: 25 degree rule from proposed development**

### **What should daylight and sunlight reports contain?**

- 3.17 The BRE guidance should form the basis for daylight and sunlight reports. They should be prepared by a specialist surveyor or consultant and assess the following:
1. Levels of daylight and sunlight that occupiers are likely to experience within the proposed development and gardens and open spaces (where relevant); and
  2. The extent that the proposed development is likely to cause on levels of daylight and sunlight entering windows of neighbouring properties, gardens and open spaces (where relevant)
- 3.18 Daylight and sunlight reports should also demonstrate how the design has taken into consideration the guidance contained in the BRE document on passive solar design; and have optimised solar gain.
- 3.19 The Council will expect daylight and sunlight reports to report daylight and sunlight levels using the tools cited in the BRE guidance. The most common tools used are:
- Vertical Sky Component (VSC)
  - Average Daylight Factor (ADF)
  - Annual Probable Sunlight Hours (APSH)
  - No Sky Line (NSL).
- 3.20 Detailed descriptions of these tools and their associated target values can be found within the BRE guidance.
- 3.21 As a minimum, daylight and sunlight reports should show:
- the expected daylight and sunlight levels before and after the development is built to enable ease of comparison;
  - full details of the methodologies used,
  - the full results of assessments; and
  - an executive summary.

### **Flexible consideration of daylight and sunlight**

- 3.22 The Council notes the intentions of the BRE document is to provide advice to developers and decision makers and therefore it should be regarded as a guide rather than policy.
- 3.23 While we strongly support the aims of the BRE methodology for assessing sunlight and daylight we will consider the outcomes of the assessments flexibility where appropriate, taking into account site specific circumstances and context. For example, to enable new development to respect the existing layout and form in some historic areas, it may be necessary to consider exceptions to the recommendations cited in the BRE guidance. Any exceptions will be assessed on a case-by-case basis.

### **Independent verification of daylight and sunlight reports**

- 3.24 In order to provide the Council with greater certainty over the expected daylight and sunlight levels stated within a daylight and sunlight report, the Council may commission an independent verification of the report, which will be funded by the applicant. Independent verification is likely to be required in instances where



there is possible dispute regarding the measurements cited or new techniques/technology is used to create daylight and sunlight measurements.

### **Other Considerations: Right to Light Legislation**

- 3.25 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.
- 3.26 Planning permission does not override a legal right to light. There also may be instances where development built under permitted development rights compromises light levels to an existing window. In both instances, where a right to light is claimed, this is a matter of property law, rather than planning law. It will be for the parties affected to seek a legal remedy. 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.

## 4 Artificial Light

### KEY MESSAGES:

- Artificial lighting should be considered at the design stage and not affect the amenity of neighbours or wildlife.
- Planning permission is required for artificial lighting structures and equipment that substantially affect the external appearance of a building.
- Developers are expected to employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to design their lighting schemes.
- The Council will apply the agent of change principle in instances where developments sensitive to high levels of artificial light are proposed near to existing uses that are reliant upon the light for their operation.

4.1 This section provides guidance on the Council's approach to artificial lighting and should be read in conjunction with Camden Local Plan policy A1 Managing the impact of development. This chapter contains the following sections:

- Artificial light
- When will planning permission be required for lighting?
- What information should accompany a planning application?
- Matters to consider when designing lighting.

### Artificial light

4.2 Excessive or poorly designed lighting can cause light spillage and glare and be damaging to the environment by:

- having a detrimental impact on the quality of life of neighbouring residents;
- changing the character of the locality;
- altering wildlife and ecological patterns; and
- wasting energy.

4.3 The following can cause an artificial light nuisance if they are not maintained or used properly

- security lights (domestic and commercial);
- sports facilities (like floodlit football pitches);
- decorative lighting of buildings or landscapes; and
- laser shows and light art.

4.4 The Council will therefore expect that the design and layout of artificial light be considered at the design stage of a scheme to prevent potential harmful effects of the development on occupiers and neighbours in terms of visual privacy, outlook and disturbance. Artificial lighting should only illuminate the intended area and not affect or affect the amenity of neighbours.

### When is planning permission required for lighting?

- 4.5 Planning permission is usually required for lighting structures and equipment that is likely to substantially affect the external appearance of a building. Planning permission is not required for carrying out maintenance that affects only the interior of a building or does not materially affect its external appearance. Temporary lighting schemes also generally do not require planning permission.
- 4.6 Examples of where planning permission is usually required include:
- illuminated advertisements, although there are some exceptions, such as those indicating medical services and some commercial advertisements on the front of business premises. (See also Camden Planning Guidance on design);
  - the erection of columns to support lighting or other similar structures; and
  - external lighting as part of an industrial or commercial scheme.
- 4.7 In accordance with Policy A1 in the Camden Local Plan, schemes that would cause unacceptable harm to amenity will not be permitted.

### What information should accompany a planning application?

- 4.8 Where planning permission for lighting schemes is required, applicants should provide the following details as applicable:
- the design of lights and associated infrastructure;
  - the number of lights;
  - lighting levels, lux and lumen details, lamp types, wattage;
  - plans showing the area to be lit and the layout of lights, including orientation of beams of light;
  - the height of lighting columns;
  - control systems including types and location of sensors, times lighting will be on; and
  - the need for the lighting, that is, an explanation of what activity the lighting is supporting.
- 4.9 All light installations should be energy efficient and 'Dark Sky' compliant, not causing obtrusive light pollution, glare or spillage and preserving a sensitively lit night-time environment.

#### **Lumen**

This is a measurement of the light output from a light source.

#### **Lux**

This is a measurement of the light intensity falling on a surface.

#### **Dark sky compliance**

To design lighting schemes in order to avoid lighting that extends beyond its intended target and would be inefficient and waste energy. It also avoids glare and light in unwanted areas.

## Matters to consider when designing lighting

### Light pollution

- 4.10 Light pollution is the term used to describe any adverse effect of artificial lighting and includes
- Glare - the uncomfortable brightness of a light source when viewed against a dark sky;
  - 'Light trespass' – the spread of light spillage from the boundary of the property on which a light is located; and
  - 'Sky glow' - the orange glow we see around urban areas caused by a scattering of artificial light by dust particles and water droplets in the sky.
- 4.11 National Planning Policy Framework (NPPF) advocates the use of good design, planning policies and decisions in order to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (paragraph 125). [National Planning Practice Guidance \(NPPG\)](#) provides detail on the factors that should be considered when assessing whether a development proposal might have implications for light pollution. In summary, these are whether the proposal could:
- materially alter light levels outside the development;
  - make the proposed location for a development unsuitable because of an existing lighting installation;
  - have significant impact on a protected site or species;
  - be located in or near a protected area of dark sky or an intrinsically dark landscape;
  - have potentially high impact on wildlife; or
  - include smooth and/or reflective building materials.

### General lighting requirements

- 4.12 To minimise obtrusive light, developers are expected to employ a specialist lighting engineer accredited by the Institute of Lighting Engineers and follow the general principles taken from the [Institution of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Light \(2011\)](#). These include the following:
- Lighting is to be directed downwards wherever possible to illuminate its target. If there is no alternative to up lighting, then the use of shields, baffles and louvres will help reduce the spill of light to a minimum. Up lighting is a particularly bad form of obtrusive light and contributes to sky glow.
  - Lighting is to be designed to minimise the spread of light near to, or above, the horizontal. Again, any light that shines above the horizontal line of the light adds to the sky glow effect.
  - Lighting should be designed to the correct standard for the task. Over-lighting is a cause of obtrusive light and also represents a waste of energy.

- The main beam angle of all lights proposed directed towards any potential observer is to be kept below 70°. It should be noted that the higher the mounting height, the lower the main beam angle could be. This will help reduce the effect of glare and light spill on neighbouring dwellings, passing motorists, pedestrians, cyclists, etc.
- Lighting should be directed to minimise and preferably avoid light spillage onto neighbouring properties. Wherever possible floodlights with asymmetric beams that permit the front glazing should be kept at, or near parallel to, the surface being lit should be used.
- The lights used should be the most efficient taking into account cost, energy use, and the purpose of the lighting scheme required. All lighting schemes should meet British Standards.

- 4.13 Artificial lighting should be sited in the most appropriate locations to cause minimal disturbance to occupiers and wildlife, while still illuminating the intended area. This includes considering any occupiers located above the lighting source.
- 4.14 Consideration should be given to lighting associated with buildings of special historic and architectural interest in order to protect their special interest and that of the wider area. This applies both to the lighting of such buildings and the impact of the lighting installation when seen by day.
- 4.15 In respect of lighting associated with sports facilities, developers should also consider guidance within Sport England's '[Artificial Sports Lighting](#)' document.

### **Lighting Infrastructure**

- 4.16 The visual effect of lighting infrastructure when viewed in the daytime needs to be considered. These elements can include junction boxes, poles, brackets and cabling. The design, size and colours of the physical infrastructure need to be carefully considered and should relate to the building it is located on.

### **Use**

- 4.17 The design of lighting should be specific to the use it supports (e.g. for recreation facilities). Hours of lighting should be limited to the times needed to support the use (both in summer and winter) and be restricted through the use of timers and sensors where relevant (e.g. for security lighting).
- 4.18 The Council may seek to secure conditions to any planning permission in order to control the hours of operation of any approved lighting scheme.

### **Agent of change principle**

- 4.19 In order to avoid adverse effects on existing businesses that are likely to generate acceptable levels of artificial light related to their operation, the Council will apply the 'agent of change principle' where light sensitive uses are proposed in close proximity to them. The agent of change principle identifies that the party responsible for a change should also be responsible for managing the impact of that change.
- 4.20 Within Camden, this is particularly relevant in cases where residential development is proposed near to an established sports, leisure or entertainment venue. New residents moving into the new residential development, for example, have the potential to make complaints with regards to glare or light trespass which could have an impact on the venue's future operation.
- 4.21 Development sensitive to high levels of artificial light proposed near to an existing use which generate artificial light that could lead to glare or light trespass should therefore include necessary measures at the design stage to mitigate the anticipated lighting effects of the venue. The Council may seek to secure mitigation measures through the use of planning conditions if necessary.

### **Consideration of biodiversity impacts**

- 4.22 Artificial lighting can often impact on wildlife habitats, particularly where lighting is proposed in open spaces, for example to provide lighting for sports courts and pitches or to improve security, such as along Regents Canal (see the Royal Commission on Environmental Pollution's 2009 report, [Artificial Light in the Environment](#)). Artificial lighting can have particularly severe implications for the natural daily rhythms of a range of animals and plants. Sites and habitats identified for their nature conservation value should therefore not be adversely affected by lighting. (See the Policies Map for the location of nature conservation sites.)
- 4.23 If proposed lighting is located within or adjacent to areas of open space or nature conservation sites, the Council will expect developers to employ a specialist lighting engineer accredited by the Institute of Lighting Engineers and provide details regarding how the lighting scheme will mitigate any potential biodiversity impacts arising from the installation or operation of the proposed lighting. This may also require a survey to identify if there are any nesting birds in the immediate vicinity or if it is close to an area where bats may hibernate or emerge at feeding time. This is particularly important if the operation of the lighting extends beyond dusk, which is roughly the time bats will come out to forage. Please also see Camden Planning Guidance on biodiversity.
- 4.24 Please contact the Council's [Nature Conservation Officer](#) at an early stage of the design of a scheme to discuss measures to mitigate the impact of lighting schemes on biodiversity. Further details can be found in Camden Planning Guidance on Biodiversity.

## 5 Construction Management Plans

### KEY MESSAGES:

- Construction Management Plans (CMPs) are expected for major developments and the Council will assess the need for a CMP for smaller developments on a case-by-case basis.
- The Council expects CMPs to be submitted after planning permission is granted and to include significant input from the contractor(s) appointed to undertake the work.
- CMPs must address transport/highways and environmental health impacts, as well as any cumulative construction impacts as a result of activity from multiple sites in close proximity to one another.
- The Council's CMP Pro-forma template must be used when completing a CMP.
- Developers are expected to consult on their CMP with affected parties before submitting it to the Council.
- There is a charge for the review and ongoing monitoring of CMPs.

- 5.1 This guidance relates to the application of Local Plan Policy A1 – Managing the impact of development and provides detail regarding the use of Construction Management Plans.

This chapter contains the following sections:

- What are construction management plans?
- Circumstances where the Council will expect a construction management plan
- How should Construction Management Plans be prepared?
- Cumulative impacts
- Consultation and Construction Working Groups
- Planning obligations

### What are construction management plans?

- 5.2 A Construction Management Plan (CMP) is a technical document, which assists the Council in fulfilling its statutory duties. The Council has a legal duty to ensure highway safety and to protect residents from the effects of noise (including vibration) and other environmental issues affecting amenity, which could result from construction activity under the Control of Pollution Act 1974, Environmental Protection Act 1990 and Prevention of Damage by Pests Act 1949.
- 5.3 A CMP sets out the measures that a contractor will take, both on-site and off-site, in order to reasonably minimise the detrimental effects of construction and incorporate mechanisms that overlap with other regulatory regimes (particularly highways and environmental protection). Most CMPs are 'umbrella' documents managing all impacts of the demolition, excavation and construction processes.
- 5.4 Besides ensuring that measures under these different service areas are coordinated in one document, CMPs represent a proactive approach to addressing construction issues. Their purpose is to encourage developers to work with the Council and local people in managing the construction process with a view to ensuring that problems are foreseen and addressed with appropriate mitigation.

Further information on CMPs is available on the Council's [website](#).

### **Circumstances where the Council will expect a Construction Management Plan**

- 5.5 Typically, a CMP will be expected where the following developments are proposed:
- major developments;
  - other developments, assessed on a case-by-case basis, where:
    - the construction process has a significant impact on adjoining properties particularly on sensitive uses;
    - particular 'on-site' issues arising from the construction process are identified (e.g. large scale demolition or complicated or intrusive remediation measures);
    - sites with poor or limited access;
    - sites with restricted access through narrow residential streets;
    - basement developments;
    - where substantial work to listed buildings or adjacent to listed buildings is proposed;
    - where wildlife could be seriously affected;
    - the anticipated length of the demolition, excavation or construction period could cause significant disturbance;
    - the construction process is likely to take place outside normal working hours;
    - specific issues have been identified in the light of external consultation (where these are supported by objective evidence);
    - where constraints arising from the layout or size of the site could impact on the surrounding road network;
    - where there are already a high number of existing active construction sites within the local area;
    - canal side sites; and
    - rail-side sites
- 5.6 CMPs are expected for all major developments. When assessing whether CMPs should be submitted for other developments, particular attention will be paid to the nature and layout of the site and any on-site factors that are likely to seriously exacerbate the impact of the 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). For smaller developments, a lack of on-site space for plant, storage of materials, and loading and unloading of vehicles may mean that construction effects will inevitably take place close to the boundary and encroach onto the public highway.

### **How should Construction Management Plans be prepared?**

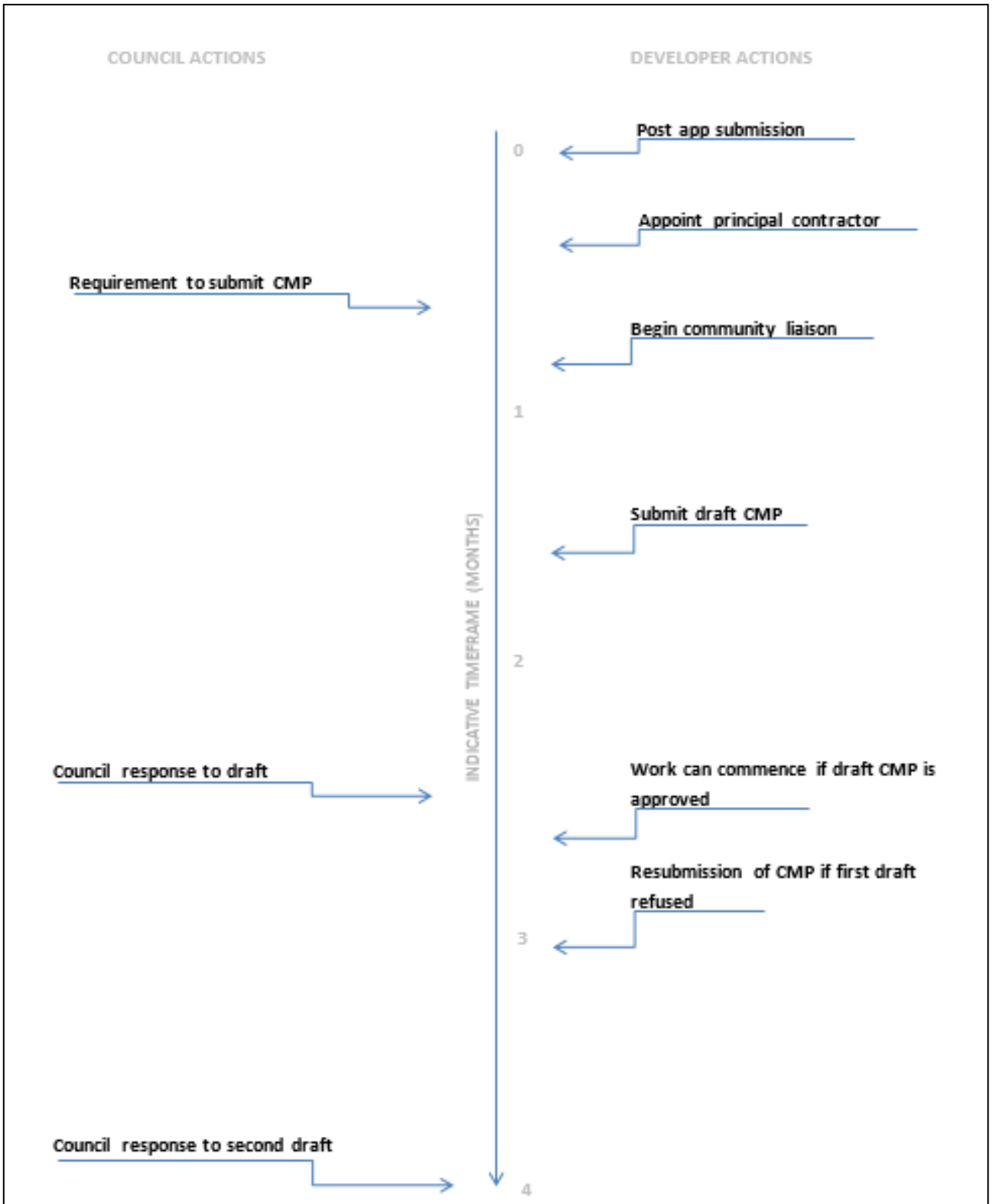
- 5.7 A CMP should be submitted after planning permission has been granted and should include significant input by the appointed contractor to ensure that the building work can be delivered as intended. It may also be necessary to seek the input from other consultants on matters such as transport, noise, and pest control.



- 5.8 The CMP must be prepared using the Council's CMP pro-forma, which outlines the information that the Council expects. The pro-forma has been developed in the context of the Council's commitment to Transport for London's CLOCS (Construction Logistics and Community Safety) Standard for Construction Logistics, Camden's Minimum Requirements for Building Construction (CMRBC), and the Council's Considerate Contractors Manual.
- 5.9 The CMP pro-forma, including guidance on how to complete the pro-forma is available on the Council's [website](#). A CMP should be treated as a 'live' document, whereby different stages will be completed and submitted as the development progresses. Where it is considered that the CMP does not adequately mitigate the current/planned works, the Council may request that the CMP be redrafted or additional information is submitted before signing off the document. Where separate contractors are responsible for different works phases (e.g. demolition phase and construction phase), the Council will expect separate CMPs prepared by each contractor for their respective phase.
- 5.10 Expected working hours should be set out in the pro-forma. Standard working hours for construction sites in Camden are 8am-6pm Monday to Friday and 8am-1pm on Saturdays. No work should take place on Sundays or public holidays. It is expected that the community be consulted on the proposed working hours. Alternatives to the standard working hours set out above may be considered where proposed in response to consultation with the community.
- 5.11 The Council is aware that some developers may be more familiar with the use of Construction Logistics Plans (CLPs), referred to in guidance published by Transport for London (TfL). It should be noted that the transport section of Camden's CMP pro-forma is based on TfL's CLP. Building on the contents of a CLP, Camden's CMP process expects additional detail relating to environmental health and community liaison considerations. These are often not considered in sufficient detail within CLP templates and associated guidance. A CLP prepared solely in accordance with TfL's CLP guidance cannot therefore be submitted as a substitute to a CMP.

Figure A below sets out the usual CMP process and timeline.

**Figure A: Construction Management Plan timeline**



### **Cumulative impacts**

- 5.12 At any given time, there are likely to be areas of the borough with particularly high concentrations of individual construction sites. Collectively these have the potential to cause unacceptable adverse impact to amenity. The Council will therefore expect that CMPs should consider the cumulative impacts that could arise from the site and other construction sites within the vicinity. The Council has a good working knowledge of the extent of current and future construction activity within specific areas and developers are encouraged to work with the Council to identify potential problems. Please contact the Infrastructure and Growth team, 5 Pancras Square, London, N1C 4AG, email: [planningobligations@camden.gov.uk](mailto:planningobligations@camden.gov.uk).
- 5.13 In order to mitigate any cumulative impacts, the Council will encourage developers to co-ordinate their construction activities with other construction sites, such as managing noisy working hours and coordinating deliveries to minimise impact on the highway network.

### **Consultation and Construction Working Groups**

- 5.14 A neighbourhood consultation process must be undertaken prior to submission of the first draft of the CMP. This consultation must focus on construction impacts (including proposed working hours), and should take place following the granting of planning permission in the lead up to the submission of the CMP.. A consultation process specifically relating to construction impact construction must take place regardless of any prior consultations relating to planning matters. Further guidance regarding how to undertake the consultation process is available on the Council's [website](#).
- 5.15 For major developments, a construction working group should be established in order to discuss, advise and, where appropriate, make recommendations to the developer in relation to the build and preparation of the CMP. Even if this group does not meet regularly, as a minimum the Council would expect a site to set up a communication distribution list with regular emails sent by the developer/contractor to keep the residents informed about the progress of the work. The working group should be made up of an appropriate number of representatives from local residents and/or business associations, a nominee of the Council if necessary, and a project manager and/or liaison officer who will act as a point of contact between the local community and the developer if necessary.

### **Planning obligations**

- 5.16 Planning conditions can only be used to control matters within the boundary of a site. However, as the range of matters typically covered by a Construction Management Plan, particularly in relation to highways, lie outside of the site boundary, a CMP will be secured through S106 legal agreement in most cases.
- 5.17 The Council has introduced an implementation support contribution that is payable by developers and secured through S106 legal agreement that is used to contribute towards the costs of the Council of reviewing, monitoring and (if necessary) enforcing CMPs. The charging structure is based on the projected officer time, which could include managing complaints from residents, meetings with the applicants and site visits in addition to the time taken to review CMPs.

Further information on Camden's CMP charge structure can be found on the Council's [website](#).

## 6 Noise and vibration

### KEY MESSAGES:

- The Council will assess the impact of noise and vibration through the consideration of acoustic reports submitted by applicants.
- Noise mitigation (where appropriate) is expected to be incorporated into developments at the design stage.
- The Council will secure mitigation measures through planning condition or legal agreement where necessary.
- The Council will adopt the 'agent of change' principle.

6.1 Noise and vibration can have a significant impact on amenity, quality of life and wellbeing. This section provides guidance regarding the application of Local Plan Policies A4 Noise and vibration and A1 Managing the impact of development, which seek to protect residents of both existing and new residential developments and the occupiers of other noise-sensitive developments from the adverse effects of noise and vibration. Appendix 3 of the Local Plan supports these policies and sets out expected standard in terms of noise and vibration.

6.2 This chapter contains guidance on the following:

- Assessing the impact of noise and vibration
- Acoustic reports
- Internal noise levels and vibration
- Plant and other noise generating equipment
- Food, drink, entertainment and leisure noise
- Delivery management.

### Assessing the impact of noise and vibration.

6.3 The Council will assess the impact of noise and vibration through acoustic reports submitted by applicants.

### When should acoustic reports be prepared?

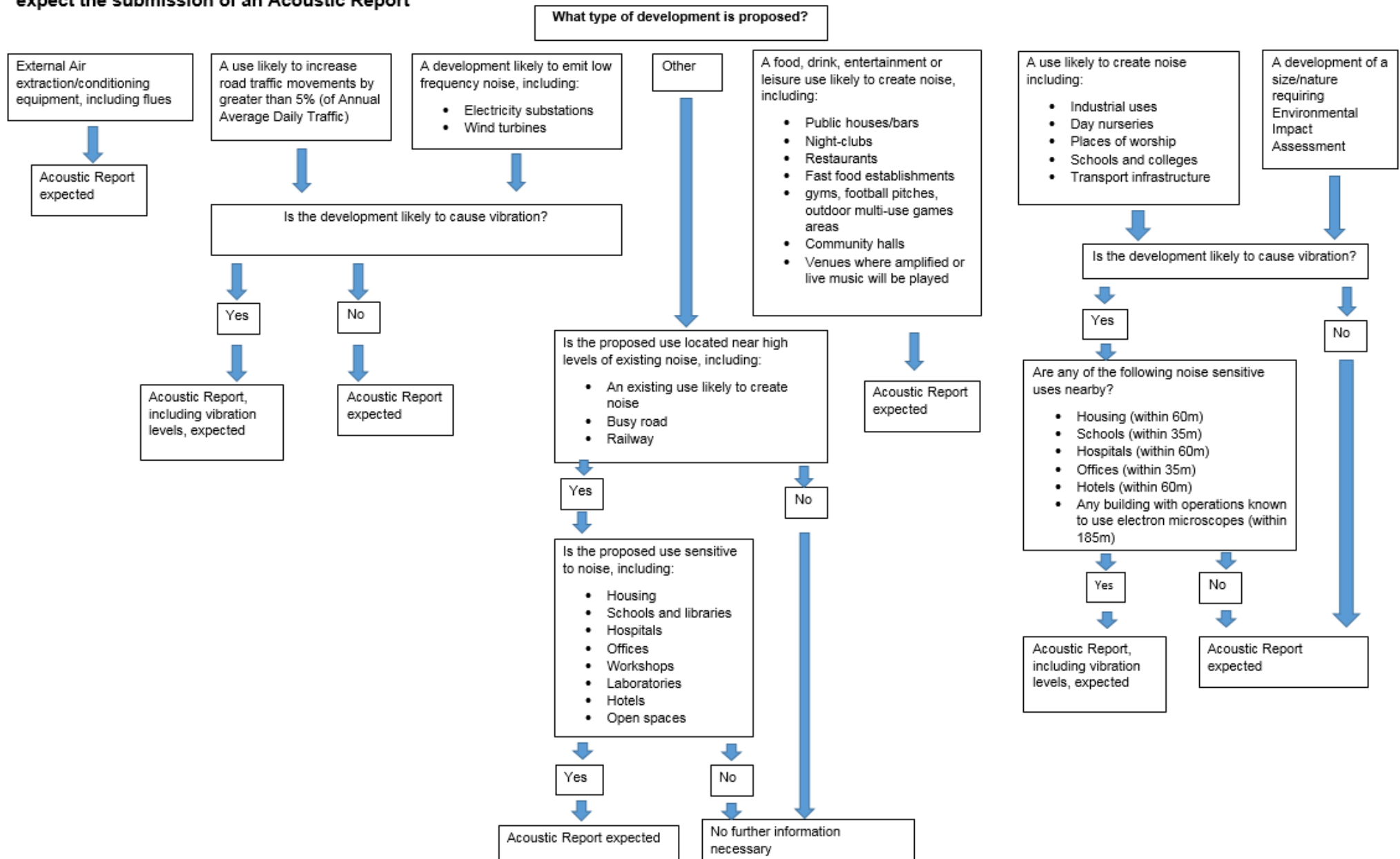
6.4 When a planning application is submitted, an acoustic report should accompany the application where any of the following are proposed:

- plant, ventilation, air extraction or conditioning equipment and flues;
- uses likely to create significant noise such as food/drink/entertainment and leisure uses, industrial uses, day nurseries, places of worship, schools and colleges;
- a noise-sensitive use located in noisy environment (e.g. near to a busy road, railway line, noisy industry)
  - noise sensitive uses include housing, schools/libraries, hospitals, offices, workshops, laboratories, hotels and open spaces.
  - a noisy environment is considered to be an area where non-standard adaptations have to be made to a development in order to prevent harmful or otherwise unwanted effects, such as annoyance or sleep disturbance.

- uses likely to generate a significant amount of traffic (defined as road traffic movements greater than 5% of Annual Average Daily Traffic); and
- developments emitting low frequency noise (e.g. electricity substation).

- 6.5 Diagram 1 below summarises the instances of where an acoustic report is expected and where the report should also consider vibration impacts.
- 6.6 After planning permission is granted, an additional acoustic report should also be submitted to consider the noise impacts of the construction stage as part of Construction Management Plans (CMPs). Please see Camden Planning Guidance relating to CMPs and information on the Council's [website](#) for further information.
- 6.7 Development of a size and/or nature requiring Environmental Impact Assessment (EIA) should also submit an acoustic report.

**Diagram 1: Flow chart showing when the Council will expect the submission of an Acoustic Report**



## Noise and vibration thresholds

6.8 When assessing acoustic reports, the Council will consider the reported measurements against the noise thresholds set out in Appendix 3 of the Local Plan. The thresholds are expressed as ‘effect levels’, which sets out a hierarchy of expected changes in behaviour and impact on health and wellbeing in response to increasing noise levels (measured in decibels - dB). The ‘effect levels’ are summarised below and explained in detail in [National Planning Practice Guidance \(NPPG\)](#). The table detailing each ‘effect level’ from NPPG is also set out in Appendix 1 to this guidance for ease of reference.

- No observed effect level (NOEL) – the level below which no effect can be detected on health and quality of life.
- Lowest observable adverse effect level (LOAEL) – the level above which changes in behaviour (e.g. closing windows for periods of the day) and adverse effects on health (e.g. sleep disturbance) and quality of life can be detected.
- Significant observed adverse effect level (SOAEL) – the level above which adverse effects on health and quality of life occur. This could include psychological stress, regular sleep deprivation and loss of appetite.

6.9 Where appropriate, the Council will also consider the cumulative impact of numerous individual noise sources where noise is known to be an issue. Camden’s town centres for example are known to have a proliferation of air conditioning machinery and contain numerous food, drink, leisure and entertainment uses which all contribute to creating noisy environments.

## Mitigating noise impacts

6.10 The implications of noise and vibration should be considered at the beginning of the design process so that the impacts of noise and vibration can be minimised. Examples of design features which could reduce noise impacts include (but are not limited to):

- locating noise sensitive areas/rooms away from the parts of the site most exposed to noises;
- creating setbacks;
- designing a 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;
- positioning non-residential uses closer to the noise source in mixed use developments;
- insulating and soundproofing doors, walls, windows, floors and ceilings;
- sealing air gaps around windows;
- double glazing;
- including architectural fins (where appropriate);
- laminated glass;
- anti-vibration foundations;
- noise barriers such as landscaping, fencing and solid balconies to reflect sound; and
- incorporating ‘sound proof’ construction/cladding materials.

6.11 In instances where noise mitigation is necessary, proposals will be expected to include appropriate attenuation to alleviate or mitigate the impact of noise and



vibrations to an acceptable level. Where noise mitigation has not been proposed adequately, but is considered necessary, the Council will consider the use of planning conditions or a legal agreement. Guidance regarding mitigation can be found within *BS8233:2014 Guidance on sound insulation and noise reduction for buildings*.

6.12 Examples of mitigation include:

- 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);
- protecting any surrounding noise-sensitive buildings (e.g. by improving sound insulation in these buildings and/or screening them by purpose-built barriers);
- ensuring an adequate distance between source and noise-sensitive buildings or areas;
- screening by natural barriers, buildings, or non-critical rooms in the development.
- limiting the operating time of the source;
- restricting activities allowed on the site;
- specifying an acceptable noise limit;
- restricting window openings;
- sound proofing internal and external walls; and
- using cladding specifically designed for sound reduction.

**Agent of change principle**

6.13 In order so existing businesses do not have unreasonable restrictions put onto them because of changes in nearby land uses, the Council will apply the ‘agent of change’ principle. The ‘agent of change’ principle identifies the person or business responsible for the change is also responsible for managing the impact of the change.

6.14 Noise sensitive uses proposed near to existing uses/businesses likely to create significant noise should therefore include necessary features to mitigate the anticipated noise and vibration effects of the existing use/business nearby.

**Acoustic reports**

6.15 Camden’s noise and vibration thresholds in Appendix 3 of the Local Plan provide the starting point for developing acoustic reports relating to:

- vibration;
- developments likely to be sensitive to noise;
- industrial and commercial noise; and
- entertainment noise.

6.16 Developers should also seek guidance from the Council’s Noise team prior to any acoustic work being carried out in order so they can advise on the best methodology for the proposed development and any bespoke reporting for developments that may fall outside of the above categories.

The Camden Council Noise team can be contacted at [RegulatoryServices@camden.gov.uk](mailto:RegulatoryServices@camden.gov.uk)

6.17 Assessments should be carried out and produced by a suitably qualified and competent consultant and conform to the standards in *BS7445 1-3:2003 Description and measurement of environmental noise* (or any later replacement guidance).

- 6.18 As assessment and guidance for noise and vibration control is always evolving, applicants must ensure that they consider amendments or updates to existing noise guidance. Where there is uncertainty, they should contact the Council's Noise team for clarification.
- 6.19 The appropriate amount and detail of information required will depend on the specific circumstances of a proposal. Details and information forming the minimum requirements for specific types of development can be provided by the Council's Noise team.
- 6.20 The minimum below information is expected to be submitted as part of an acoustic report:
- description of the proposal;
  - description of the site and surroundings, a site map showing noise and vibration sources and measurement locations;
  - background noise levels measured over a minimum of 24 hours;
  - 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; and
    - length of time of the output.
  - features of the noise or vibration e.g. impulses, distinguishable continuous tone, irregular bursts;
  - specification of the plant, supporting structure, fixtures and finishes;
  - location of noise sensitive uses and neighbouring windows;
  - details of measures to mitigate noise and vibration;
  - details of any associated work including acoustic enclosures and/or screening;
  - cumulative noise levels; and;
  - hours/days of operation.
- 6.21 In order to demonstrate all the above has been submitted, a copy of the Council's acoustic report [Checklist](#) should also be submitted along with the report.

## Internal noise levels and vibration

### Internal noise levels

- 6.22 The requirements of the Building Regulations are usually adequate for the sound insulation between floors and walls of adjoining dwellings, making planning conditions unnecessary.
- 6.23 The requirements of the Building Regulations are however likely to be inadequate in instances where:
- a new commercial use likely to generate noise adjoins an existing residential building (and vice versa); and/or
  - a change of use will result in a residential development being sited in a noisy environment.

- 6.24 Where such development is proposed, the Council is likely to use planning conditions requiring substantially enhanced sound insulation of relevant walls, floors and ceilings compared to the minimum specifications of the Building Regulations. In proposing conditions, the Council will consider guidance available within *BS8233:2014 Guidance on sound insulation and noise reduction for buildings*, [Guidelines for Community Noise \(1999\)](#) and [Night Noise Guidelines for Europe \(2009\)](#) published by the World Health Organisation.

### **Vibration**

- 6.25 Vibrations transmitted through the structure of a building can be detected by its occupants and can result in adverse effects. Depending on the timing and the nature of the vibration, occupants may have disturbed sleep or struggle to work efficiently. Vibration at higher magnitudes can even act to damage a building over time.
- 6.26 When assessing the impact of vibration, the Council will expect the vibration thresholds within Camden Local Plan Appendix 3 not be exceeded and consider guidance from *B6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings Part 1: Vibration sources other than blasting'*.

### **Plant and other noise generating equipment**

- 6.27 Developments proposing plant, ventilation, air extraction or conditioning equipment and flues will need to provide the system's technical specifications to the Council accompanying any acoustic report. '*BS4142 Method for rating Industrial and Commercial Sound*' contains guidance and standards which should also be considered within the acoustic report.
- 6.28 There are however likely to be instances where the Council will consider that a BS4142 assessment alone is not sufficient to provide all the information necessary. Plant such as electrical substations for example, may meet BS4142 standards, but are also known to emit low frequency noise, which also needs to be considered. Developers are therefore encouraged to discuss proposals of this nature with the Council's Noise team before preparing their acoustic report - Email: [RegulatoryServices@camden.gov.uk](mailto:RegulatoryServices@camden.gov.uk).
- 6.29 Plant, ventilation, air extraction or conditioning equipment and flues can cause disturbance to residential properties. The Council would therefore welcome the use of long-term maintenance agreements to ensure that equipment maintains acceptable noise levels over its lifetime and the use of timers to limit any unnecessary operation of the equipment.

### **Food, drink, entertainment and leisure noise**

- 6.30 Food, drink, entertainment and leisure uses can pose particular difficulties in terms of noise and disturbance, as their peak operating time is usually in the evening and late at night.
- 6.31 Where such uses are proposed, access routes, outdoor standing/seating areas, smoking areas, pub gardens, etc. should be sited away from noise sensitive facades and/or effectively screened.
- 6.32 The Council expects the noise impacts of these uses to be considered within an acoustic report. Assessments of noise from entertainment and leisure premises must include consideration of amplified and unamplified music, human voices, footfall, vehicle movements and other general activity. Developers should contact the Council's Noise team to discuss the most appropriate methodologies to undertake the assessment.

6.33 Principally, in order to manage food, drink, entertainment and leisure noise, the Council will consider the use of planning conditions to control aspects such as (but not limited to):

- opening times;
- amplified music (e.g. times when music can be played and maximum volumes); and
- restrictions on times where outdoor standing/seating areas can be used.

6.34 In line with Local Plan policies TC4 and C5, the Council will also consider the use of management plans secured through a section 106 legal agreement, which may include elements principally seeking to manage noise off-site. Examples could include:

- staff training;
- positioning queues away from residential buildings; and
- ensuring that bottles and cans are not disposed of in outdoor bins areas late at night.

In order for existing businesses to continue operating without restriction, in instances where a noise sensitive use is proposed near to an existing food, drink, entertainment or leisure venue known to generate noise and vibration, the Council will apply the 'agent of change' principle (referred to in Section 1). Within Camden, this will often mean that residential development will be expected to include sufficient insulation to mitigate the anticipated noise and vibration effects of a nearby food, drink, entertainment or leisure venue.

### Delivery management

6.35 Deliveries and collections can cause disruption to nearby residential properties. When preparing Delivery and Servicing Management Plans, in order to reduce noise impacts regard should be given to the following:

- [Noise Abatement Society's Silent Approach Quiet Night Time Delivery Scheme](#);
- Guidance published by [Transport for London](#) regarding retiming and consolidating deliveries;
- [Freight Transport Association Guidance Delivering the Goods – a toolkit for improving night-time deliveries](#); and
- Camden Local Plan Policy T4 Sustainable movement of goods and materials and associated Camden Planning Guidance to reduce the number of overall deliveries.

6.36 The Council expects that deliveries and refuse collections to be carried out between 08:00-20:00hrs. Developments requiring deliveries outside of these times should provide an acoustic report to demonstrate there will be no adverse impact in relation to noise, with particular reference to residential occupiers as a result of these activities. When preparing the assessment, regard should be given to *BS4142 Method for rating and assessing industrial and commercial sound*. Developers are however encouraged to discuss their proposals with the Council's Noise team before conducting their acoustic report. (Email: [RegulatoryServices@camden.gov.uk](mailto:RegulatoryServices@camden.gov.uk).)

## 7 Wind and micro-climate

### KEY MESSAGES:

- New developments should consider the local wind environment, local temperature, overshadowing and glare, both on and off the site.
- Buildings taller than their surroundings may cause excessive wind in neighbouring streets and public areas.
- Where poor wind conditions already exist reasonable attempts must be made to improve conditions.

- 7.1 The purpose of this guidance is to ensure that appropriate standards are met in the design of buildings and outdoor features to ensure that suitable safety and comfort levels are achieved in terms of wind and microclimate. It relates to Camden Local Plan Policy A1 Managing the impact of development and Policy D1 Design in relation to tall buildings (paras 7.35-7.38).
- 7.2 London Plan policy 7.6 Architecture seeks to ensure that buildings and structures do not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. Furthermore, London Plan policy on tall and large buildings (policy 7.7) states that tall buildings, among other things, should not affect their surroundings adversely in terms of microclimate and wind turbulence.
- 7.3 This chapter contains guidance on the following:
- When wind and microclimate should be considered
  - Wind
  - Other influences on microclimate

### When wind and microclimate should be considered

- 7.4 This guidance applies to all development that has the potential to change its environment with regard to wind and micro-climate, including extensions (see box below). However, the implications for a proposal will vary greatly depending on the nature of the site, the scale of development, its interaction with surrounding sites, and existing buildings and structures on the site.
- 7.5 The construction of a building changes the microclimate in its vicinity. Micro-climate refers to local conditions including wind, temperature, overshadowing, access to daylight and general comfort. In particular high-rise buildings can cause high wind velocities at pedestrian level which can create an uncomfortable environment and can even be dangerous. Therefore, the design of a building should not only focus on the building envelope and on providing good indoor environment, but should also consider the effect on the surrounding outdoor environment.

- 7.6 Developments with potential to change their local environment include:
- New or modified tall buildings or buildings significantly higher than any surrounding building;
  - Significant modifications to the built environment in areas of quantifiable and recognised existing wind nuisance;
  - Major proposals adjacent to or incorporating a significant area of public or outdoor space;
  - Developments with a large amount of glazing or dark masonry surfaces; or
  - A combination of new or modified buildings that cumulatively, will significantly change the wind environment.

### Wind

- 7.7 Buildings taller than their surroundings may cause excessive wind in neighbouring streets and public areas. Environmental winds are primarily driven by building massing and should be considered at the early design stages, when changes to achieve design objectives can be made most easily.
- 7.8 The Council will expect applicants to consider the local wind environment, both on and off the site, when designing schemes. Where poor wind conditions exist in an area prior to development, a reasonable attempt must also be made to improve conditions in general.

### What information should be provided on wind?

- 7.9 The Council expects relevant developments to use the established Lawson Comfort Level Ratings. The Lawson Criteria are used throughout the UK to assess local wind environments and are a widely accepted assessment tool.

#### **The Lawson Comfort Criteria**

The Lawson Comfort Criteria is a scale for assessing the suitability of wind conditions in the urban environment based upon threshold values of wind speed and frequency of occurrence.

It sets out a range of pedestrian activities from sitting through to crossing the road and for each activity defines a wind speed and frequency of occurrence (see Figure 1 below).

If the wind conditions exceed the threshold then the conditions are unacceptable for the stated activity.

**Figure 1 - Lawson Comfort Level Rating**

Lawson Comfort Level Rating	Predominant activity	Mean hourly wind speed exceeded less than 5% of the time
C4 - Long term "Sitting"	Reading a newspaper and eating and drinking	4m/s
C3 - "Standing" or short term sitting	Appropriate for bus stops, window shopping and building entrances	6m/s
C2 - Pedestrian Walking or "Strolling"	General areas of walking and sightseeing	8m/s
C1 - Business "Walking"	Local areas around tall buildings where people are not expected to linger	10m/s

7.10 For relevant developments, planning applications should be accompanied by qualitative wind impact statement, prepared by a suitably qualified professional (i.e. wind engineer or similar).

7.11 You must firstly carry out a qualitative wind impact assessment. If the results of this show potential negative impacts you will also need to carry out a quantitative assessment. Both assessments must be submitted with the planning application. The assessment must provide detailed information on how the proposal meets this guidance, using quantitative measures (i.e. evidence of wind tunnel testing or similar).

**A Wind Impact Statement must:**

- Show how the proposal is expected to affect the local wind environment;
- Describe how the proposal has addressed the local wind environment;
- Include reference to specific features of the site or the development that make a contribution to the wind environment, either positively or negatively, and highlight areas of concern; and
- Reference the proposal's ability to meet the targets of this guidance, and make recommendations regarding the necessity for additional work, as described below.

**A Wind Impact Statement should:**

- Compare existing and proposed conditions against the Lawson Comfort Criteria in both summer and winter conditions;
- Demonstrate how the proposal has adapted to the local wind environment;
- Reference specific features of the site or the development that make a contribution to the wind environment, both positively or negatively;
- Highlight areas of concern, and
- Describe the proposal's ability to adhere to the guidance.

Impact on the following areas must be considered where relevant:

- public and private open spaces on and adjacent to the site;
- outdoor areas on upper levels of the development;
- entrance and exit areas;

- shop windows;
- bus stops;
- outdoor dining areas;
- thoroughfares; and
- pedestrian crossing points.

- 7.12 If a proposal does not achieve the targeted ratings or outcomes applicants must provide sound justification to demonstrate, to the satisfaction of the Council, why their proposal cannot meet the targets. This justification should be prepared in conjunction with, and endorsed by a wind engineer, and must include evidence of the attempts that have been made to address design deficiencies.
- 7.13 If a proposal does not satisfactorily meet the criteria, and satisfactory justification is not provided, the proposal may be refused.
- 7.14 The Council may attach conditions to secure the achievement of wind speeds around a building no greater than those predicted. The Council may require alterations or other remedial measures at the developer's expense if wind speed targets are not met.

### **Other considerations relating to the wind environment**

- 7.15 Development must not compromise the viability of wind-driven renewable energy generators on adjacent and nearby sites. Where wind-driven energy generators are likely to be significantly affected, applicants are responsible for mitigating the loss by moving, modifying or replacing the installation, or by incorporating equivalent renewable energy generation within the application site.
- 7.16 Where a development affects the viability of an existing wind-driven renewable energy generator, and the solution is to modify the installation off-site, all approvals, expenses and risks are the responsibility of the applicant. This requirement will be incorporated as a condition or in a S106 agreement relating to any approval. Where additional renewable energy capacity is to be installed on site, this will be assessed in conjunction with other renewable energy installations. (Note: additional capacity that is gained by installations off-site should be credited toward the onsite requirement for the development)
- 7.17 Wind environment also impacts on natural ventilation systems. Therefore, natural ventilation must also be considered in building design.

### **Other influences on micro-climate**

#### **Local heat**

- 7.18 Local air temperature can be affected by a building's ability to absorb heat during the day and release it at night. This cumulative effect of this happening across London results in the urban heat island effect. The Council strongly encourages green roofs, brown roofs, green walls and soft landscaping in all developments to reduce this effect. Applicants can also consider light coloured building materials so unnecessary heat is not absorbed by a proposed building. See Camden Planning Guidance on sustainability for further guidance on these issues.

#### **Overshadowing**

- 7.19 You should consider the design of your proposal carefully so that it does not block sunlight and overshadow windows or open spaces and gardens. It will be particularly important in Central London and other densely developed part of the borough to prevent overshadowing of amenity space and open spaces given the limited amount of open



spaces and the existing amount of overshadowing. Further detail can be found in the daylight and sunlight chapter of this Guidance.

### **Glare**

- 7.20 Glare is uncomfortably bright sunlight reflected from a building façade. It is generally caused by tall, fully glazed and sloping facades with reflective finishes that reflect the sun. Tall buildings should be designed to avoid this and use materials that do not result in glare. See Artificial Light section of this Guidance for further details.

## 8 Contaminated land

### KEY MESSAGES:

- Contaminated land can pose a serious risk to health and the environment.
- Contaminated land assessments should be submitted for developments located on contaminated land or propose a use that has the potential to contaminate land.
- Developers should contact the Council's Contaminated Land team for information regarding a site's contamination history and possible remedial measures.

8.1 This guidance relates to the application of Camden Local Plan Policy A1 – Managing the Impact of development, and relates to contaminated land. It covers the following:

- What is contaminated land?
- Causes of land contamination
- Contaminated land assessments
- Assessments for existing contaminated land
- Assessments where there is potential land contamination through the proposed use
- How should contaminated land assessments be prepared?
- Use of planning obligations
- Involvement of statutory consultees

### What is contaminated land?

8.2 Contaminated land is land that has been polluted with harmful substances to the point where it now poses a serious risk to health and the environment. 'Contaminated land' has a specific legal definition which is used in relation to an 'unacceptable risk' of harm to health. For more information please see Department for Environment, Food and Rural Affairs (DEFRA) web pages.

### Causes of land contamination

8.3 In Camden, historic land contamination is most commonly derived from land uses such as engineering & manufacturing works, chemical works, metal plating works, printers, leather works, railways and electrical substations.

8.4 Some common reasons for land becoming contaminated include:

- improper chemical handling or disposal practices;
- accidental spillages, or leakages of chemicals during manufacturing or storage;
- polluted groundwater migrating under a site; and
- particles settling from factory emissions.

8.5 The most common pollutants of land in Camden include heavy metals (such as lead, arsenic, cadmium and chromium), asbestos and organic compounds.

- 8.6 Contamination can also come from historical activities dating back many hundreds of years, such as spoil heaps from some Roman lead mines, and even from naturally occurring substances.
- 8.7 Contaminants may still be present above acceptable levels even though the polluting use stopped many years ago.

### **Contaminated land assessments**

- 8.8 To protect the local environment and the health and well-being of residents, workers and visitors, the Council will expect Contaminated Land Assessments for any developments that:
- are known to be contaminated;
  - have the potential to be contaminated, through previous or current uses;
  - are located in close proximity to contaminated land; or
  - propose a use that has potential to contaminate land.

### **Assessments for existing contaminated land**

- 8.9 In principle, the Council supports the redevelopment of contaminated sites where the contamination issue can be successfully addressed and where future uses can be carried out safely. Remediation is particularly important where people will have access within redeveloped sites to land for gardening, play or planting food for consumption.
- 8.10 In order to know whether the site is contaminated, developers are encouraged to submit an enquiry to the Council's Contaminated Land team. They will be able to provide detail regarding the extent of contamination (if any), the historic practices that could have contributed to the contamination and advice whether a detailed contaminated land assessment is required.
- 8.11 For email enquiries and further information, please see our contaminated land [webpages](#).

### **Assessments where there is potential land contamination through the proposed use**

- 8.12 Where a development includes any potentially contaminative uses the Council will expect proposals to be submitted to prevent future contamination of land or groundwater. Details of the potential risks and proposed mitigation should be set out within a contamination assessment and any environmental assessments.

### **How should contaminated land assessments be prepared?**

- 8.13 The contamination assessment should accompany a planning application so that contamination issues can be assessed at the planning application stage. The assessment should be carried out by a Geo-technical or Geo-environmental Engineer, in consultation with the Council's Contaminated Land team and should determine:
- the existence of, or potential for, contamination;
  - the nature of the contamination and the risks it may pose; and
  - whether these can be satisfactorily reduced to an acceptable level.
- 8.14 The contaminated land assessment should comply with the policies and advice in the following:

- Paragraphs 120 and 121 of the National Planning Policy Framework (NPPF)
- [National Planning Practice Guidance: Land affected by contamination](#)
- Any guidance published by the Mayor of London regarding hazardous substances (See London Plan Policy 5.22)
- [Contaminated Land Report 11 \(CLR11\) – Model Procedures for the Management of Land Contamination \(Environment Agency\)](#)
- Development on Land Affected by Contamination: A Guide to help developers meet planning requirements (London Boroughs of Camden, Kensington and Chelsea, Westminster, Barking and Dagenham, Islington and Ealing - copies are available from the Council's [Contaminated Land team](#))
- British Standard Institution guidance relating to contaminated land.

### **Use of planning obligations**

- 8.15 Where remediation or mitigation measures are necessary, these will be secured through conditions or section 106 legal agreement.
- 8.16 For developments in or adjacent to areas where objectives for land contamination are unlikely to be met by condition (i.e. where there is still a residual impact), the Council will require a section 106 planning obligation. The planning obligation will be directed towards measures designed to deal with the contamination, including during construction works, and to make the site suitable for its intended use.
- 8.17 The Council may seek a financial contribution for:
- site investigation and remediation works which would include any measures to prevent hazards arising from future use of the site and the removal or containment of any contaminants;
  - monitoring work following the completion of the development, e.g. measuring ground gas or ground water contamination in boreholes or installing permanent monitoring equipment; and
  - a verification report (post-development survey) to confirm that remediation measures have been completed successfully.
- 8.18 A management plan may also be necessary to cover the maintenance of remedial works, such as landscaping or water treatment facilities, or to set out restrictions to minimise and control future potentially hazardous or contaminating development or use of the site.

### **Involvement of statutory consultees**

- 8.19 If there is any existing contamination (or potential risk of contamination) to ground or surface water or to land with a statutory nature conservation designation, either from the existing state of the piece of land or from proposed works on it, the Environment Agency must be informed and their consent obtained for any works.
- 8.20 Historic England should also be contacted where contaminated land is within an Archaeological Priority Area. These can be identified on the Council's policies map.

## Appendix 1: Effect level hierarchy

Perception	Examples of outcomes	Increasing effect level	Action
<b>No observed effect level (NOEL)</b>			
Noticeable and not intrusive	Noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.	No Observed Adverse Effect	No specific measures required
<b>Lowest observable adverse effect level (LOAEL)</b>			
Noticeable and intrusive	Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.	Observed Adverse Effect	Mitigate and reduce to a minimum
<b>Significant observed adverse effect level (SOAEL)</b>			
Noticeable and disruptive	The noise causes a material change in behaviour and/or attitude, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
Noticeable and very disruptive	Extensive and regular changes in behaviour and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non-auditory	Unacceptable Adverse Effect	Prevent

Adapted from table cited in NPPG Paragraph: 005 Reference ID: 30-005-201



# Camden Planning Guidance

## Basements

March 2018



# CPG Basements

1	Introduction	3
	What is Camden Planning Guidance?	3
	Basements in Camden	3
	Defining basements	3
	What does this guidance cover?	4
	When does this guidance apply?	4
	Article 4 for basement development	4
	Neighbourhood Planning	5
	Basements and lightwells	6
	Planning and design considerations	6
	Summary flowchart	7
2	Basement size and design	9
	Skylights	15
	Habitable rooms	15
	Basement walls, windows and doors	15
	Lightwells	15
	Railings, grilles and other lightwell treatments	16
	Conservation areas and listed buildings	17
3	Trees, landscape and biodiversity	19
4	Assessing the impact of basement development	20
	Basement impact assessments	20
	Independent verification of basement impact assessments	26
	Basement construction plans	27
	Principal impacts of basements in Camden	28
5	Impact on neighbours from demolition and construction	39
	Considerate Constructors Scheme	39
	Construction management plans	39
	Sustainable construction	41
6	Other permits and requirements	42
	Building regulations	42
	Highway licence	42
	Approval in principle	43
	Party wall award	43
	Security for expenses	43
	Freeholder permission	44
	Flooding and positively pumped devices (PPDs)	44



# 1. Introduction

## What is Camden Planning Guidance?

- 1.1 The Council has prepared this Camden Planning Guidance to support the policies in the Camden Local Plan 2017. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions.
- 1.2 This document should be read in conjunction with, and within the context of, the relevant policies in the Camden’s Local Plan 2017.
- 1.3 The Council formally adopted this CPG on basements on 26<sup>th</sup> March 2018 following statutory consultation. This documents replaces Camden Planning Guidance 4: Basements and Lightwells (July 2015).

## Basements in Camden

- 1.4 With a shortage of development land and high land values in the borough the development of basements is a popular way of gaining additional space in homes without having to relocate. Basements are also a typical feature of the Central London part of Camden and used for various purposes including commercial, retail and leisure uses, servicing and storage. However, while basement developments can help to make efficient use of the borough’s limited land, they have the potential to cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas and the natural environment.

## Defining basements

- 1.5 The introduction to Policy A5 of the Local Plan states:  
“When this policy refers to basement development this includes basements, lightwells and other underground development. ...  
A basement is a floor of a building which is partly or entirely below ground level. A ground or lower ground floor with a floor level partly below the ground level (for example on a steeply sloping site) will therefore generally be considered basement development. (Camden Local Plan paragraph 6.109)”
- 1.6 Whether a storey of a building should be considered a basement in applying Policy A5 of Camden’s Local Plan is a matter of fact and degree and the Council will consider each scheme on its merits.
- 1.7 When identifying a basement the Council will generally consider that a basement is a floor that is predominantly under the prevailing ground level of the site.
- 1.8 Where a building is located on sloping land and there is a change in level across a site, a storey which is accessed at ground level at one side of the site (with no steps or ramp) will generally not be considered a

basement, unless the site has been excavated to allow access to that floor.

### **What does this guidance cover?**

- 1.9 This guidance gives detailed advice on how we will apply planning policies when making decisions on new basement development or extensions to existing basement accommodation.
- 1.10 Policy A5 of the Camden Local Plan requires applicants to consider a scheme's impact on local drainage and flooding and the potential effects on neighbouring properties including on groundwater conditions and ground movement. Section 3 of this guidance document sets out how basement impact assessments need to provide evidence on these matters.
- 1.11 This guidance supports policy A5 Basements in Camden's Local Plan. Other relevant policies in the Local Plan include:
- A1 Managing the impact of development
  - D2 Heritage
  - CC3 Water and flooding
  - A3 Biodiversity
- 1.12 Please note that there are other matters outside of the scope of this guidance that applicants should address when proposing new basement development. These include design, heritage, sustainability and the water environment. The Council's approach to these, and other issues, is set out in the Local Plan and Camden Planning Guidance.

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

- 1.13 This guidance applies to all developments in Camden that propose a new basement or other underground development, or an extension to existing basement or other underground development. Underground developments may include ground or lower ground floors where excavation is required, for example when a ground floor is extended further into sloping land requiring excavation.

### **Article 4 Direction for basement development**

- 1.14 To manage the impacts of basement developments across the borough the Council has made a non-immediate Article 4 Direction which removes permitted development rights for basement development. The Article 4 direction came into force on 1 June 2017.
- 1.15 Previously under 'permitted development' rights planning permission was generally not required for a basement that is built entirely underneath a property and does not extend beyond it, for example, underneath the garden or surrounding land.
- 1.16 The Article 4 direction removed this right so that all basement or lightwell excavations in the borough will need planning permission and will be assessed against the Council's planning policies. The proposed Article 4 Direction applies to the whole of the London Borough of Camden. Further information on can be found at: [www.camden.gov.uk/article4directions](http://www.camden.gov.uk/article4directions)

## Neighbourhood Planning

- 1.17 Many areas in Camden have neighbourhood plans or are in the process of developing them. Some neighbourhood plans have local policies on basement development. Basement development schemes should comply with policies in relevant neighbourhood plans as well as Local Plan policies (in particular policy A5 on basements) and this guidance. To identify if your property is affected by a neighbourhood plan please refer to [www.camden.gov.uk/neighbourhoodplanning](http://www.camden.gov.uk/neighbourhoodplanning)

## Basements and lightwells

### KEY MESSAGES

- Basement development must not cause harm to:
  - neighbouring properties;
  - the structural, ground, or water conditions of the area;
  - the character and amenity of the area; and
  - the architectural character and heritage significance of the building and area.
- The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property.
- Basement development must be no more than one storey deep and must not exceed 50% of the garden of the property.
- Applicants will be required to submit information relating to the above within a Basement Impact Assessment (BIA) which is specific to the site and particular proposed development.
- In some instances the Council will require a Basement Construction Plan to be provided.
- The Council strongly encourages applicants to use the Council's BIA proforma to ensure that all aspects of this assessment are addressed.
- To ensure the right people are engaged in the preparation of a BIA, the Council has published a 'Scope of Services' document.
- BIAs will require expert independent verification funded by the applicant. Applicants should use the Council's BIA proforma in preparing BIAs.
- An Article 4 Direction covers the whole of the London Borough of Camden meaning that all basement development requires planning permission.

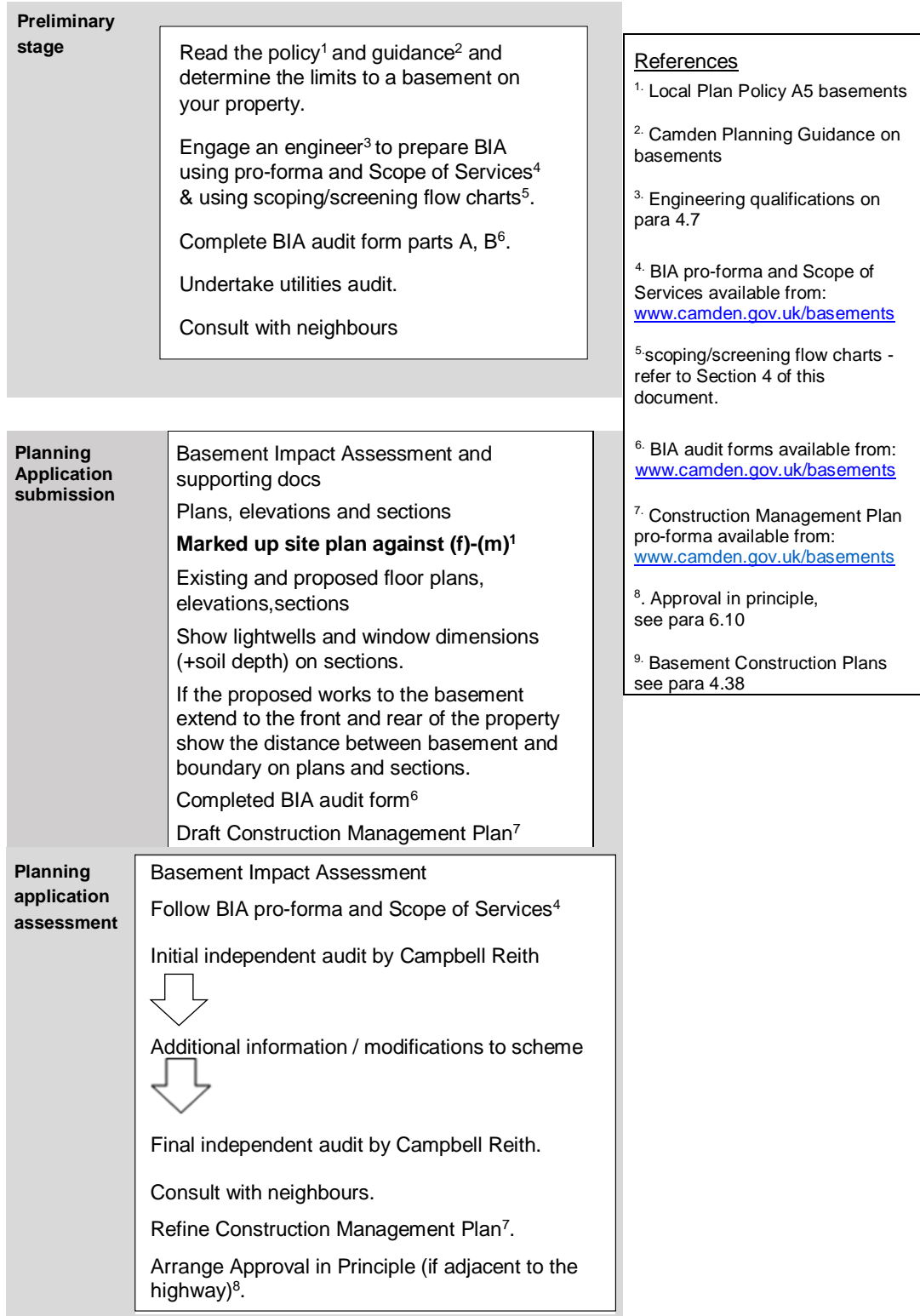
### Planning and design considerations

- 1.18 Basements schemes should take place in a way that ensures they:
- do not harm neighbouring properties including not placing occupiers at risk or have any significant effects on the stability or bearing capacity of adjacent land generally;
  - do not harm the water environment including avoid adversely affecting drainage, run-off, or ground permeability;
  - avoid cumulative impacts including impacts on the structural stability or the water environment in the local area, including flooding;
  - do not harm the recognised architectural character of buildings and surrounding areas, including gardens and nearby trees, and that conservation area character is preserved or enhanced;
  - conserve the biodiversity value of the site; and
  - achieve sustainable development.

**Summary flowchart**

1.19 Basement development is a complex and technical process and developers need to be aware of the major tasks when planning to excavate a basement. The flowchart below has been produced to assist in this process.

**Figure 1. Summary flowchart for basement developments**



**Section 106 /  
after  
determination**

Construction Management Plan<sup>7</sup>

Approval in Principle (if adjacent to  
the highway)<sup>8</sup>

Basement Construction Plan (if  
required)<sup>9</sup>

Maintain engineer on site

Engage with neighbours throughout  
construction

## 2 Basement size and design

- 2.1 Often with basement development, the only visual features are lightwells, skylights, or pavement lights, with the bulk of the development concealed wholly underground, away from public view. However, just as overly large extensions above the ground level can dominate a building, contributing to the over-development of a site, an extension below ground can be of an inappropriate scale.

### **SKYLIGHT –**

A window, dome, or opening in the roof or ceiling, to admit natural light.

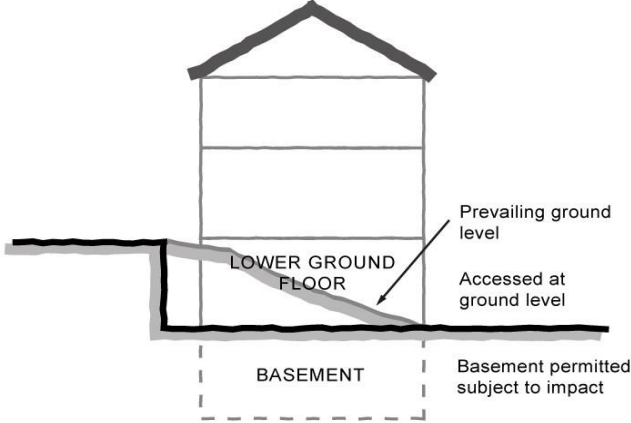
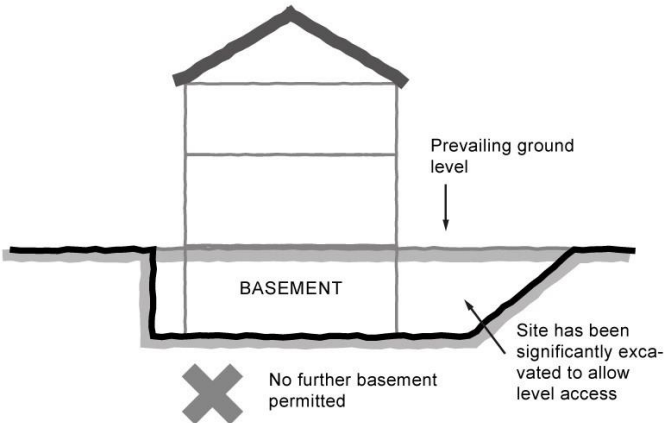
### **LIGHTWELL –**

An opening within or next to a building that allows natural light to reach basement windows that would otherwise be obscured.

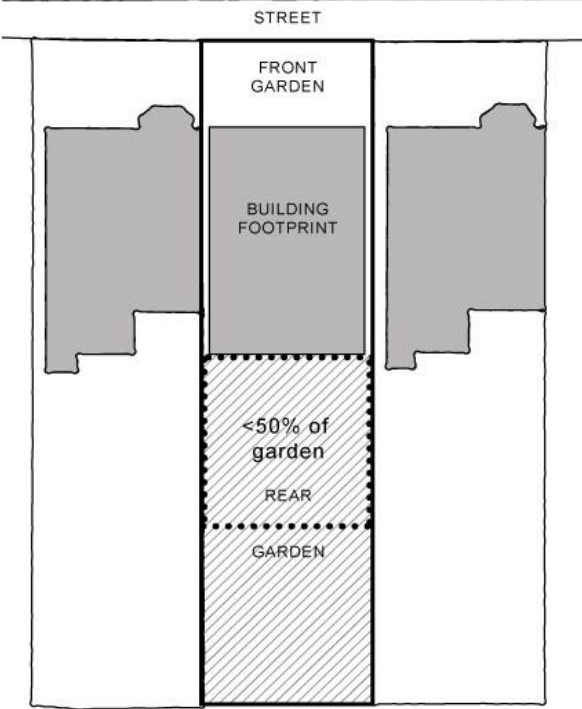
- 2.2 Larger basements can have a greater impact on the water environment by reducing the area for water to runoff and soak away. Basement development that extends below garden space can also reduce the ability of that garden to support trees and other vegetation leading to poorer quality gardens, a loss in amenity and the character of the area, and potentially a reduction in biodiversity.
- 2.3 Larger basement developments also require more extensive excavation resulting in longer construction periods, and greater numbers of vehicle movements to remove spoil. These extended construction impacts can have a significant impact on adjoining neighbours through disturbance through noise, vibration, dust, and traffic, and parking issues.
- 2.4 Local Plan Policy A5 on basements limits the size of basement developments. The section below lists the relevant criteria from Policy A5 accompanied by diagrams to show how these criteria apply.

**Table 1: Policy A5 Basements, criteria f. to m. regarding the size of basement developments**

<b>Policy A5</b>	<b>Guidance and diagrams</b>
<i>“The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:...</i>	A basement development that does not extend beyond the footprint of the original building and is no deeper than one full storey below ground level is often the most appropriate way to extend a building below ground.
<i>f. not comprise of more than one storey;</i>	The Council considers a single storey for a basement to be approximately 3 to 4 metres in height. The requirement for storey heights to be no more than 3-4 metres refers to

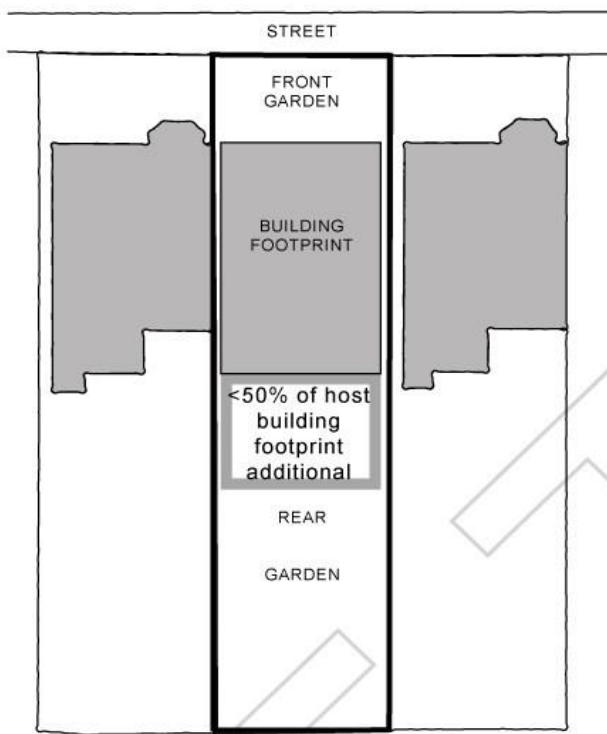
	<p>the total depth of the excavation (the external dimensions).</p> <p>Where appropriate we will allow a proportion of the basement to be deeper to allow development of swimming pools. Allowance of this addition depth will only be appropriate where it does not harm the neighbouring properties or the structural, ground, or water conditions of the area, and where the additional depth is required for a swimming pool and it not being used for any other purposes.</p>
<p><i>g. not be built under an existing basement;</i></p>	<p>Refer to paragraph 1.4, above, for details on basement definitions.</p> <p><b>Sloping and excavated sites</b></p> <p>Where a building is located on sloping land and there is a change in level across a site, a floor which is accessed at ground level at one side of the site (with no steps or ramp) will generally not be considered a basement, unless the site has been significantly excavated to allow access to that floor as shown in Figure 2, below.</p> <p><b>Figure 2. Sloping sites</b></p>  <p><b>Figure 3. Excavated sites</b></p> 



	<p><b>Lower ground floors</b></p> <p>Storeys built partially below ground are common in Camden, in particular in historic buildings. To be considered a lower ground floor and not a basement the storey must typically:</p> <ul style="list-style-type: none"> <li>• Have a significant proportion above the prevailing ground level,</li> <li>• Be accessible from the outside of the building at the front and rear of the property,</li> <li>• Form part of the original fabric of a building, and □ Form part of the character of the area.</li> </ul>
<p><i>h. not exceed 50% of each garden within the property;</i></p>	<p>This criterion applies to the front garden, the rear garden and gardens to the side of the property individually, rather than calculated as an aggregated garden area for the whole property. This criterion applies to gardens as they currently exist and not the gardens of the proposed development. The unaffected garden must be in a single area and where relevant should form a continuous area with other neighbouring gardens. Sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees.</p> <p><b>Figure 4. Criterion h.</b></p>  <p>Unaffected Garden: the area of garden under which no basement has been developed.</p> <p>For example wildlife corridors can exist at the very rear of property boundaries. It may be desirable to ensure that basements are not constructed along the rear boundary of properties in this instance.</p>

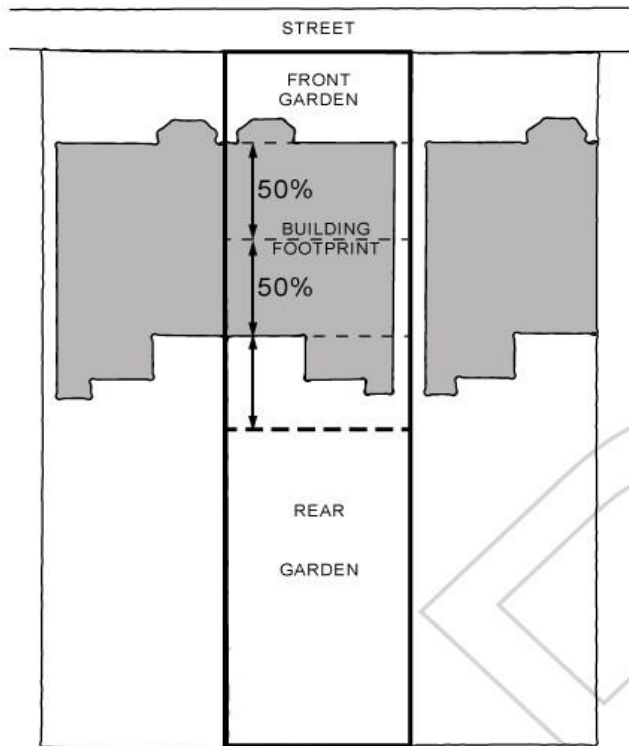
*i. be less than 1.5 times the footprint of the host building in area;*

**Figure 5. Criterion i.**



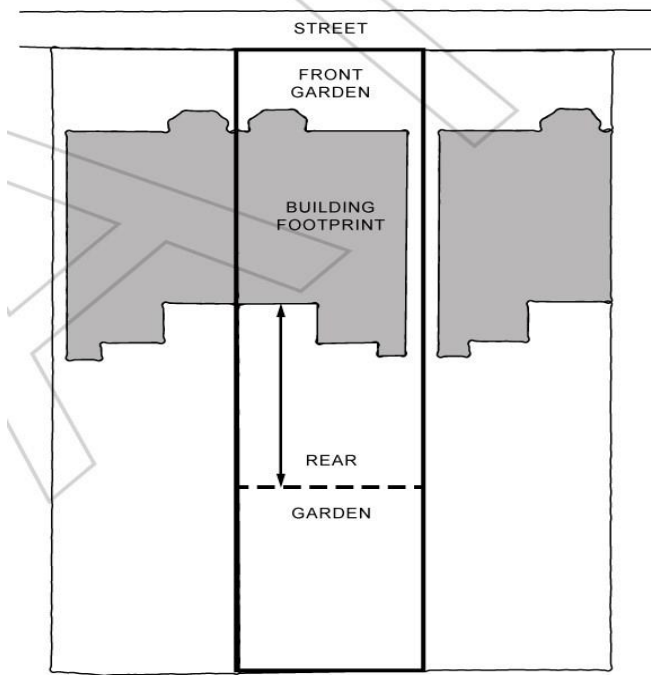
*j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;*

**Figure 6. Criterion j.**



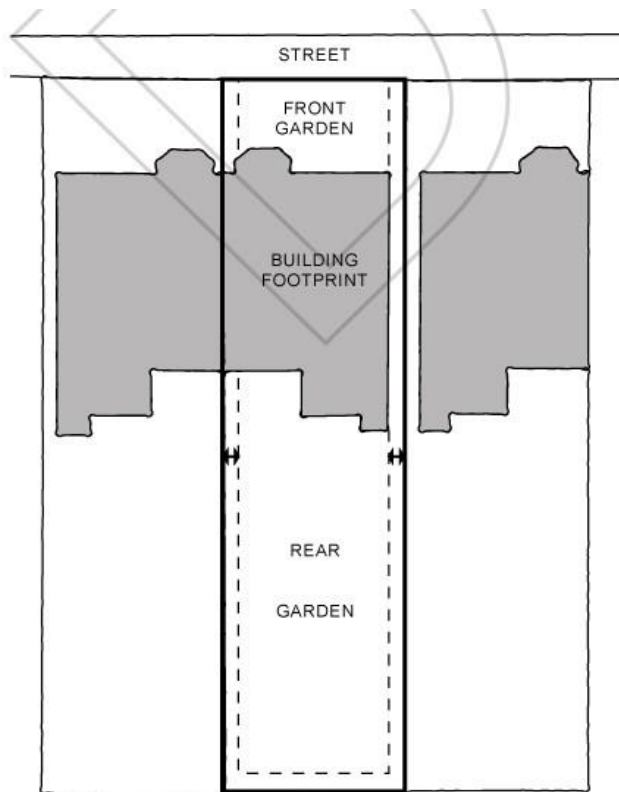
*k. not extend into or underneath the garden further than 50% of the depth of the garden;*

**Figure 7. Criterion k.**



*l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and*

**Figure 8: Criterion l.**



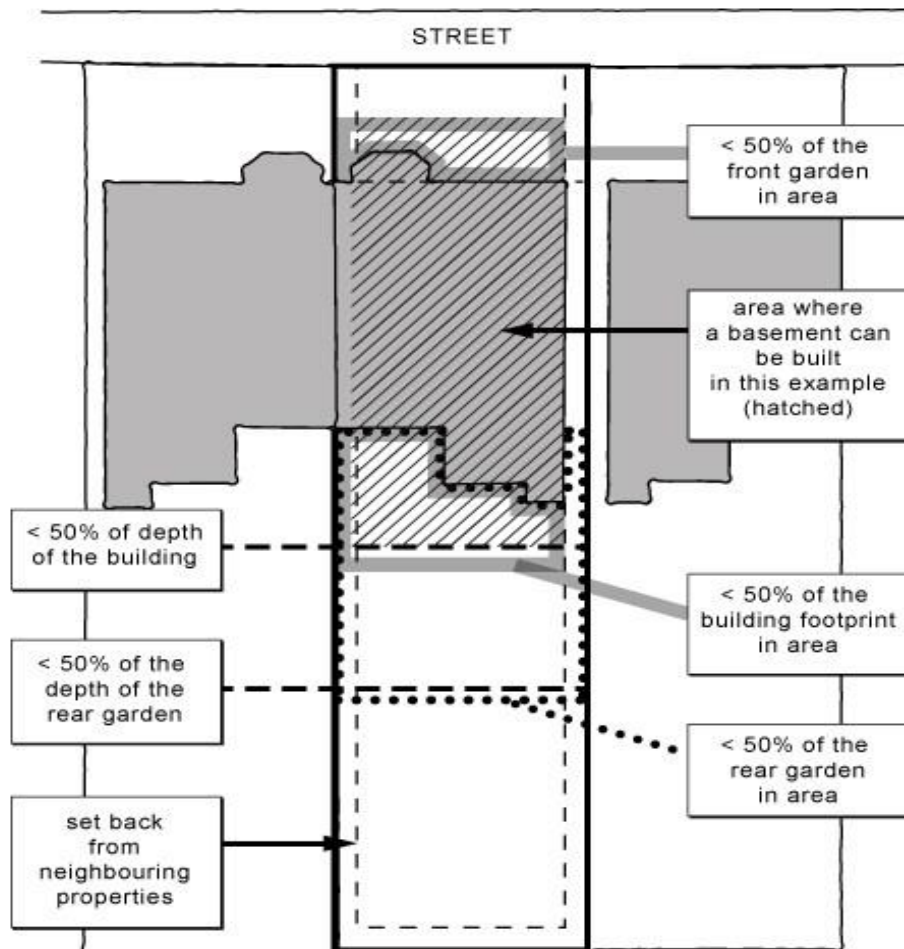
The policy objective is to provide significant space free from basement development to enable water drainage and area for planting. How this unaffected area is connected to neighbouring properties should be considered.

Providing a setback to neighbouring properties will generally not be required where built form or a basement on the neighbouring property extends up to the property boundary.

<p><i>m. avoid the loss of garden space or trees of townscape or amenity value</i></p>	<p>In accordance with Local Plan policy A3 on biodiversity the Council will expect developers to follow the principles and practice set out in 'British Standard 5837:2012 (or as subsequently updated) Trees in relation to design, demolition and construction - Recommendations'</p> <p>To find out more information on trees including identifying which trees are protected by a Tree Preservation Order visit <a href="http://www.camden.gov.uk/trees">www.camden.gov.uk/trees</a></p>
<p><i>Exceptions to f. to k. above may be made on large comprehensively planned sites."</i></p>	<p>For the purposes of this policy, large comprehensively planned sites are:</p> <ul style="list-style-type: none"> <li>• new major developments, for example schemes which comprise 1000sq m additional non-residential floorspace or 10 or more additional dwellings;</li> <li>• large schemes located in a commercial setting; or developments the size of an entire or substantial part of an urban block.. (Local Plan para 6.133)</li> </ul>

2.6 The criteria of policy A5 must be considered together, therefore the area where a basement may be developed is the smallest of these areas. The diagram below shown all of the considerations together.

Figure 9. All criterion of Policy A5 of the Local Plan



## Skylights

- 2.7 Where a basement extension under part of the front or rear garden is considered acceptable, the inclusion of skylights designed within the landscaping of a garden will not usually be acceptable, as illumination and light spill from a skylight can harm the appearance of a garden setting.

## Habitable rooms

- 2.8 Local Plan Policy A5 on basements states that the Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding. Outside of these areas, where basement accommodation is to provide living space (possibly for staff), it will be subject to the same standards as other housing in terms of space, amenity and sunlight. Suitable access should also be provided to basement accommodation to allow for evacuation. Further guidance is contained in the Camden Planning Guidance on Housing.

## Basement walls, windows, and doors

- 2.9 The development of a basement and the introduction of light wells may result in an area of exposed basement wall and will usually mean new window or door openings. Any exposed area of basement development to the side or rear of a building will be assessed against the guidance in CPG1 Design (refer to section 4 on extensions, alterations and conservatories). In general, this expects that any exposed area of basement:
- is subordinate to the building being extended;
  - respects the original design and proportions of the building, including its architectural period and style; and
  - minimises the loss of garden space.
- 2.10 Any visible basement wall should not dominate the original building due to its size.
- 2.11 In number, form, scale and pane size, basement windows should relate to the façade above. They should normally be aligned to the openings above and be of a size that is clearly subordinate to the higher level openings so as not to compete with the character and balance of the original building. On the street elevation, and on certain rear elevations where there is a distinguishable pattern to the fenestration, the width and height of windows should be no greater than those above.

### **FAÇADE –**

The face or front of a building.

### **FENESTRATION –**

The arrangements of windows in a building.

## Lightwells

- 2.12 The building stock in Camden is varied. Some areas contain basements developments that include front lightwells taking up part, or all, of the front garden. Other areas do not have basements or lightwells that are visible from the

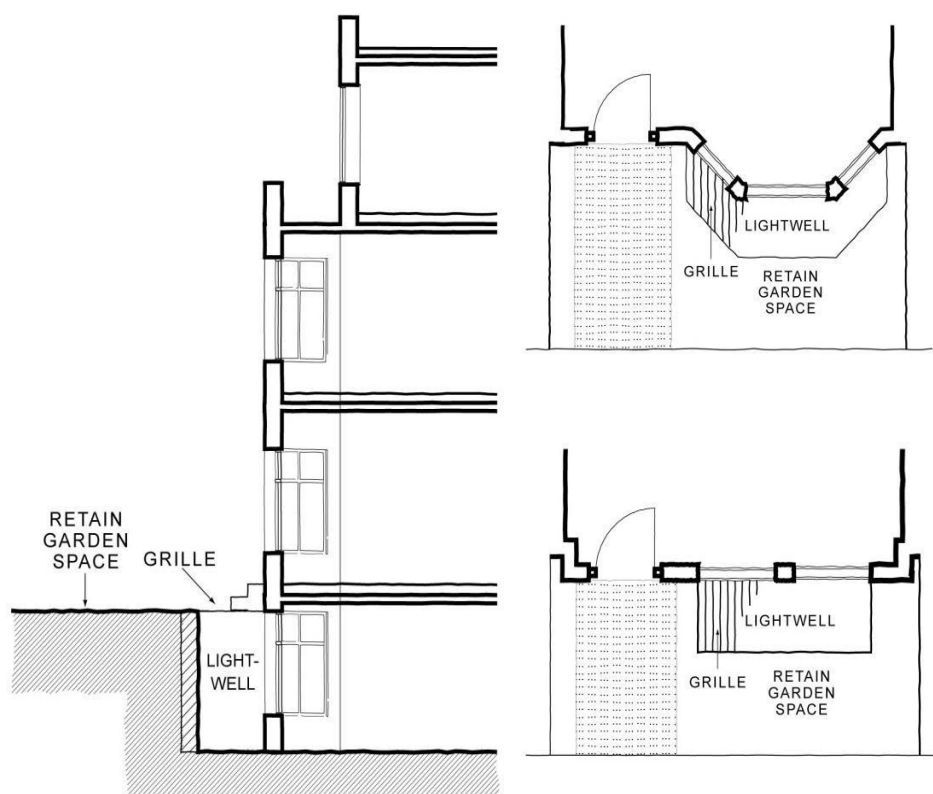
street. The presence or absence of lightwells helps define and reinforce the prevailing character of a neighbourhood.

- 2.13 Where basements and visible lightwells are not part of the prevailing character of a street, new lightwells should be discreet and not harm the architectural character of the host building, or the character and appearance of the surrounding area, or the relationship between the building and the street. For example lightwells may need to be covered by a grille, have no railing, and be of an size appropriate to the host building and garden.
- 2.14 In situations where lightwells are not part of the established street character, the characteristics of the front garden or forecourt will help to determine the suitability of lightwells.
- 2.15 In plots where the depth of a front garden is quite long, basement lightwells are more easily concealed by landscaping and boundary treatments, and a substantial garden area can be retained providing a visual buffer from the street. In these situations new lightwells that are sensitively designed to maintain the integrity of the existing building may be acceptable, subject to other design requirements and environmental considerations.
- 2.16 In plots where the front garden is quite shallow, a lightwell is likely to consume much, or all, of the garden area. This is likely to be unacceptable in streets where lightwells are not part of the established character and where the front gardens have an important role in the local townscape.
- 2.17 Excessively large lightwells will not be permitted in any garden space.
- 2.18 A lightwell to the side or rear of a property is often the most appropriate way to provide a means of providing light to a new or extended basement development, and can often provide a link to the rear garden. Lightwells to the side or rear of a property should be set away from the boundary to a neighbouring property.
- 2.19 Applicants should check with Building Control at an early stage how their basement proposal incorporates a means of escape and whether this has been properly considered with regard to the size of the lightwell.

### **Railings, grilles and other lightwell treatment**

- 2.20 In order to comply with Building Regulation standards, lightwells should be secured by either a railing (1,100mm high) or a grille. In gardens that front a street, railings can cause a cluttered appearance to the front of the property and can compete with the appearance of the front boundary wall, or obscure front windows. This is particularly the case in shallow gardens. Where front light wells are proposed, they should be secured by a grille which sits flush with the natural ground level, rather than railings (refer to Figure 10 on the following page). In certain publicly accessible locations grilles should be locked to prevent lightwells being misused (e.g. for casual sleeping or drug use). In most cases metal is the preferred material for grilles and railings. Glass railings or grilles are unlikely to be acceptable.
- 2.21 Railings will be considered acceptable where they form part of the established street scene, or would not cause harm to the appearance of the building or the surrounding area.

Figure 10. Lightwells and railings



- 2.22 The lowering of the natural ground level to the rear of the property should be minimised as much as is practicable.

### Conservation areas and listed buildings

- 2.23 In the case of listed buildings, applicants will be required to consider whether basement and underground development preserves the existing fabric, structural integrity, layout, interrelationships and hierarchy of spaces, and any features that are architecturally or historically important. Where the building is listed, new basement development or extensions to existing basement accommodation will require listed building consent, even if planning permission is not required. The acceptability of a basement extension to a listed building will be assessed on a case-by-case basis, taking into account the individual features of the building and its special interest. Applicants should contact the Council at the earliest opportunity to discuss such proposals. Enquiries of this type can be answered through the duty planning service:

<https://www.camden.gov.uk/ccm/content/contacts/councilcontacts/environment/contact-the-duty-planner/>

#### **LISTED BUILDING CONSENT –**

This is legally required in order to carry out any works to a Listed Building that will affect its special value. This is necessary for any major works, but may also be necessary for minor alterations and even repairs and maintenance. Listed Building Consent may also be necessary for a change of use of the property.

- 2.24 As with all basement schemes, the Council will need to be satisfied that effective measures will be taken during demolition and construction works to ensure that damage is not caused to the listed building and any buildings it directly adjoins. Poor demolition and construction methods can put neighbouring properties at risk and so can have considerable effects on the character and appearance of heritage buildings and conservation areas.
- 2.25 The Council will expect the submission of a management plan for demolition and/or construction where basement works are proposed in conservation areas or adjacent to a listed building. Further guidance on this is set out in the section on construction management plans in Camden Planning Guidance on Amenity.



### 3 Trees, landscape, and biodiversity

- 3.1 Policy A5 of the Local Plan on basements ensures that basements are not built underneath excessive proportions of the gardens of properties. Applicants should also be mindful of the need to preserve or enhance the garden area for trees, other vegetation, and to support biodiversity. Sufficient margins should be left between the site boundaries and any basement construction to enable natural processes to occur and for vegetation to grow naturally. These margins should be wide enough to sustain the growth and mature development of the characteristic tree species and vegetation of the area. The Council will seek to ensure that gardens maintain their biodiversity function for flora and fauna and that they are capable of continuing to contribute to the landscape character of an area so that this can be preserved or enhanced.

**GREEN ROOF –**

A roof that has vegetation growing on it, which can help improve visual appeal, reduce the environmental impact of the building and create habitat for native flora and fauna.

**DETENTION POND –**

A stormwater management facility that is designed to protect against flooding by storing water for a limited period of time.

- 3.2 Basement developments should provide an appropriate proportion of planted material to allow for rain water to be absorbed and/or to compensate for the loss of biodiversity caused by the development. This will usually consist of a green roof or detention pond on the top of the underground structure. It will be expected that a minimum of 1 metre of soil be provided above basement development that extends beyond the footprint of the building, to enable garden planting and to mitigate the effect on infiltration capacity. The use of sustainable urban drainage systems (SUDS) is sought in all basement developments that extend beyond the footprint of the original building. For further guidance on SUDS, please see Camden Planning Guidance on sustainability.
- 3.3 Consideration should be given to the existence of trees on or adjacent to the site, including street trees and the required root protection zone of these trees. Camden Planning Guidance on design sets out the evidence that the Council requires with respect to the protection of trees, including tree surveys and arboricultural method statements.

**ROOT PROTECTION ZONE –**

The area around the base or roots of the tree that needs to be protected from development and compaction during construction to ensure the survival of the tree.

- 3.4 To find out more information on trees including identifying which trees are protected by a Tree Preservation Order visit [www.camden.gov.uk/trees](http://www.camden.gov.uk/trees) .

## 4 Assessing the impact of basement development

- 4.1 The Council will only permit basements and other underground development where the applicant can demonstrate it will not cause harm to the built and natural environment and local amenity, including to the local water environment, ground conditions and biodiversity. Addressing these issues may require the submission of a variety of information to provide us with a basis for determining applications. The level of information required is set out in Local Plan Policy A5 Basements and this guidance will be commensurate with the scale, location and complexity of the scheme.

### Basement impact assessments

- 4.2 This information must be contained within a Basement Impact Assessment (BIA) which is specific to the site and particular proposed development. Basement Impact Assessments should be submitted with the other details at planning application stage. To assist applicants in preparing BIAs the Council has produced a proforma. Applicants and engineers are not required to use this document as an actual template, but, in order to ensure that all aspects of the BIA requirements have been addressed (and the requirements of Policy A5 met), the Council strongly encourages adopting the headings provided by the proforma and including information on all relevant topics under those headings. Use of non-standard formats may result in delay or additional costs associated with the independent audit. The proforma is available to download from the Council's website at [camden.gov.uk/basements](http://camden.gov.uk/basements). Most BIAs will need to be independently audited, further details on this process are set out below in paragraph 4.36 below.
- 4.3 The BIA will include the following stages:
- Stage 1 - Screening;
  - Stage 2 - Scoping;
  - Stage 3 - Site investigation and study;
  - Stage 4 - Impact assessment; and
  - Stage 5 - Review and decision making.
- 4.4 The purpose of a BIA is to enable the Council to 'assess whether any predicted damage to neighbouring properties and the water environment is acceptable or can be satisfactorily ameliorated by the developer' as stated in Local Plan policy A5 on basements.
- 4.5 Each of these stages is explained in full in this section. Please also refer to Chapter 6 of the Camden Geological, Hydrogeological and Hydrological Study, which is available on the Camden Council website. All the technical analysis and recommendations in this guidance are taken from the Study which should be treated as the evidence base and technical advice for this guidance and will be used when we are checking BIA reports.
- 4.6 We will expect a 'non technical summary' of the evidence that applicants have gathered against each stage of the BIA. This should be presented

in a format which can be fully understood by those with no technical knowledge.

- 4.7 At any stage in the process experienced engineering professionals who hold qualifications relevant to the matters being considered, should be engaged undertaking the BIA process. The Council has prepared a 'Scope of Services' which provides guidance on the engineering input likely to be required to complete a BIA (this can be downloaded from the Council's website at [camden.gov.uk/basements](http://camden.gov.uk/basements)). This will assist applicants when engaging the services of engineers. The Council will only accept the qualifications set out in the following table:

#### Qualifications required for assessments

Surface flow and flooding	A Hydrologist or a Civil Engineer specialising in flood risk management and surface water drainage, with either:  □ The "CEng" (Chartered Engineer) qualification from the Engineering Council; or a Member of the Institution of Civil Engineers ("MICE"); or □ The "C.WEM" (Chartered Water and Environmental Manager) qualification from the Chartered Institution of Water and Environmental Management.
Subterranean (groundwater) flow	A Hydrogeologist with the "CGeol" (Chartered Geologist) qualification from the Geological Society of London.
Land stability	A Civil Engineer with the "CEng" (Chartered Engineer) qualification from the Engineering Council and specialising in ground engineering; A Member of the Institution of Civil Engineers ("MICE") and a Geotechnical Specialist as defined by the Site Investigation Steering Group; or A Chartered Member of the Institute of Structural Engineers with some proof of expertise in engineering geology.  With demonstrable evidence that the assessments have been made by them in conjunction with an Engineering Geologist with the "cGeol" (Chartered Geologist) qualification from the Geological Society of London.

#### Stage 1 - Screening

- 4.8 The first stage of the BIA is the identification of any matters of concern which should be investigated. Screening is a process of determining whether or not a full BIA is required. All basement proposals should be subjected to the screening stage of a BIA to identify the matters relevant to assessment of local flooding and/or neighbour amenity and structural risks.
- 4.9 In order to assist in identifying what issues are relevant to a proposed scheme we have developed a series of screening flow charts over the following pages of this guidance, covering three main issues:

- Groundwater flow (see Paragraphs 2.36 to 2.38);
- Land stability (see Paragraphs 2.39 to 2.42); and
- Surface flow and flooding (see Paragraphs 2.43 to 2.47).

- 4.11 We will expect applicants to identify how these issues impact on neighbouring properties and the natural environment.
- 4.12 At the screening stage the applicant will need to set out clearly why or why not a full BIA is required. This will need to include an assessment against the flowcharts later in the section and be presented along with the information set out at the end of Paragraph 233 of the Camden Geological, Hydrogeological and Hydrological Study.
- 4.13 Where a respondent answers “yes” or “unknown” to any of the questions in the flowcharts these matters will need further investigation. “No” answers will require written justification.

### **Stage 2 - Scoping**

- 4.14 The scoping stage of the BIA requires applicants to identify the potential impacts of the proposed scheme as set out in chapter 5 of the Camden Geological, Hydrogeological and Hydrological Study which are shown by the screening process to need further investigation. Applicants should use this stage to identify the potential impacts for each of the matters of concern identified in the previous screening stage, this may require some preliminary data collection and field work. Appendix F of the Camden Geological, Hydrogeological and Hydrological Study provides guidance on linking the potential impacts to the screening flowcharts. A conceptual ground model is often a useful of carrying out the scoping stage as it can include the known and suspected features on, below and adjacent to a proposed site. (refer to Section 6.3.3 and Figure 28 in the Camden Geological, Hydrogeological and Hydrological Study for further details and an example).
- 4.15 During the scoping stage the applicant should enter pre-consultation or set up a working group with local residents and amenity groups who may be impacted by a proposed basement in order to fully understand and address the concerns of local residents. The Council will expect consultation with local residents on all basement developments unless the proposed construction work is minimal and will have a negligible effect on the adjoining or nearby properties as evidenced by the applicant to the satisfaction of the Council.
- 4.16 The scoping stage should build on the information obtained for the screening stage. When doing work for scoping stage, it is most likely that there will need to be some works under Stage 3 of the BIA – Site investigation and study

### **Stage 3 – Site investigation and study**

- 4.17 The third stage of the BIA – site investigation – is undertaken to develop an understanding of the site and its immediate surroundings. The degree of investigation will vary depending upon the matters of concern identified in the screening and scoping stages, and therefore will be dependent on the location of the proposed basement within the borough, its size and setting in relation to existing development on the site and its

relationship to adjacent properties and nearby features of importance. This information must be site specific.

- 4.18 The BIA site investigation comprises several stages, including:
- Desk study, including site walkover;
  - Field investigation, including intrusive investigation;
  - Monitoring;
  - Reporting; and
  - Interpretation.
- 4.19 Each of these stages should examine both the site of the proposed basement scheme and beyond the site boundary.
- 4.20 Section 7 of the Camden Geological, Hydrogeological and Hydrological Study sets out in further detail how this investigation should be carried out.
- 4.21 Appendix G of the Camden Geological, Hydrogeological and Hydrological Study provides typical contents lists for reporting these stages of the site investigation and we will be looking for submissions that contain comparable content.

#### **Stage 4 – Impact assessment**

- 4.22 This stage is concerned with evaluating the direct and indirect implications of the proposed project. Essentially this involves a comparison between the present situation (the baseline) with the situation as it would be with the basement in place (i.e. constructed). Therefore the BIA should describe, quantify and then aggregate the effects of the development on those attributes or features of the geological, hydrogeological and hydrological environment which have been identified (in the scoping stage) as being potentially affected. Section 7 of the Camden Geological, Hydrogeological and Hydrological Study provides more detail on what is required at this stage.
- 4.23 The recommendations in Section 7 on boreholes and trial pits set out the thorough, up to date and professional methodologies of subsurface investigation and analysis, which the Council will expect. It is important to recognise as stated in Paragraph 287 and 288 of the Camden Geological, Hydrogeological and Hydrological Study that Local Plan policy A5 on basements is particularly concerned with the potentially significant impact a development can have beyond the site boundary. Where permission is not given by adjacent landowners for structural surveys or subsurface investigations to be carried out, the undetermined structural conditions and ground conditions beyond the site boundary should be identified as a risk and assessed and mitigated against accordingly.
- 4.24 Hydrogeological processes are subject to seasonal and longer term cyclical influences. Measurements taken at one particular time may not indicate how conditions might be in one or six months from that time.
- 4.25 Monitoring of groundwater levels in areas where it is more likely to be present over a period of time is therefore necessary. Please refer to paragraphs 291 to 294 of the Camden Geological, Hydrogeological and Hydrological Study for more detail on monitoring periods.
- 4.26 The BIA will comprise a factual report and an interpretative report. This is explained in more detail in Section 7 of the Camden Geological, Hydrogeological and Hydrological Study. The interpretative report will have three sections:

- detailed site geology;
- the geotechnical properties of the ground; and
- an engineering interpretation of the implications of the ground conditions for the development of the site.

- 4.26 Appendix G3 of the study sets this out in more detail from which it should be noted that it must contain details of the retaining wall design for the basement excavation. It is essential for the Council to make the assessment called for by policy A5 on basements and to be able to consider, if planning approval is to be given, how the terms of any planning conditions or planning agreements should be drafted.
- 4.27 The engineering interpretation will require calculations of predicted ground movements and structural impact to be provided. Examples of these calculations are given in appendix D of the Camden Geological, Hydrogeological and Hydrological Study. The sides of excavation always move to some extent no matter how they are supported. The movement will typically be both horizontal and vertical and will be influenced by the engineering properties of the ground, groundwater level and flow, the efficiency of the various support system employed during the underpinning and the efficiency or stiffness of any support frames used.
- 4.28 If the identified consequences are not acceptable, mitigation should be incorporated into the proposed scheme and the new net consequences determined. For example, where there is predicted structural damage to neighbouring property, or where water ingress to neighbouring gardens or properties is predicted to be damaging to residential amenity. Any proposed mitigation measures should be described in the BIA report with details of how they reduce and/or alter the impact of the proposed basement on the surrounding environment. Mitigation measures which may be included in basement development proposals include (but are not limited to):
- Controlled or adequate drainage;
  - High permeability corridors;
  - Underpinning of neighbouring structures; and
  - Setting the basement in from property boundaries.

### **Burland Scale**

- 4.29 Where a BIA identifies risk of damage to properties by subsidence this risk should be described using the Burland Scale. The Burland Scale methodology has been adopted for projects internationally and has been used by the Building Research Establishment and the Institution of Structural Engineers, London. The classification system of the scale is based on the ease or repair of visible damage. Subsidence is only one element in the many potential impacts assessed in a BIA and other methods will be employed when describing these other impacts.
- 4.30 In the Burland Scale the damage to properties caused by subsidence may be considered in three broad categories:
- (i) visual appearance or aesthetics,
  - (ii) serviceability and function, and
  - (iii) stability.

- 4.31 Burland Scale categories 0, 1, and 2 refer to (i) aesthetic damage, category 3 and 4 relate to (ii) serviceability and function, and 5 represents damage which relates to stability.

**Figure 11. Burland Scale**

<b>Category of damage</b>	<b>Description of typical damage</b>	<b>Approximate crack width (mm)</b>	<b>Limiting tensile strain <math>\epsilon_{lim}</math> (per cent)</b>
0 Negligible	Hairline cracks of less than about 0.1 mm are classed as negligible	<0.1	0.0-0.05
1 Very slight	Fine cracks that can easily be treated during normal decoration. Perhaps isolated slight fracture in building. Cracks in external brickwork visible on inspection	<1	0.05-0.075
2 Slight	Cracks easily filled. Redecoration probably required. Several slight fractures showing inside of building. Cracks are visible externally and some repointing may be required externally to ensure weathertightness. Doors and windows may stick slightly.	<5	0.075-0.15
3 Moderate	The cracks require some opening up and can be patched by a mason. Recurrent cracks can be masked by suitable lining. Repointing of external brickwork and possibly a small amount of brickwork to be replaced. Doors and windows sticking. Service pipes may fracture. Weathertightness often impaired.	5-15 or a number of cracks > 3	0.15-0.3
4 Severe	Extensive repair work involving breaking-out and replacing sections of walls, especially over doors and windows. Windows and frames distorted, floor sloping noticeably. Walls leaning or bulging noticeably, some loss of bearing in beams. Service pipes disrupted.	15-25 but also depends on number of cracks.	>0.3

5 Very severe	This requires a major repair involving partial or complete rebuilding. Beams lose bearings, walls lean badly and require shoring. Windows broken with distortion, Danger of instability.	Usually > 25 but depends on number of cracks	
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Damage Category Chart (CIRIA C580)

- 4.32 In line with policy A5 on basements the Council will ensure that harm is not caused to neighbouring properties by basement development. Burland states that it is a major objective of design and construction to maintain a level of risk to buildings no higher than category 2, where there is only risk of aesthetic damage to buildings (see Burland, J. "The assessment of the risk of damage to buildings due to tunnelling and excavations", Imperial College London, 1995). However the Council considers that neighbouring residential properties are particularly sensitive to damage, where relatively minor internal damage to a person's home can incur cost and considerable inconvenience to repair and redecorate.
- 4.33 Policy A5 on basements states that applicants must therefore demonstrate in the Basement Impact Assessment that the basement scheme has a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight'.

#### **Cumulative impacts of basement development**

- 4.34 The cumulative effect of the incremental development of basements in close proximity, particularly when these are large, can potentially create a significant impact. Therefore Basement Impact Assessments must identify neighbouring basements and make the assessment considering all nearby basements. Both existing and planned (with planning permission) underground development must be included in this assessment. To ensure cumulative impacts are considered Basement Impact Assessments must respond to the issues raised in paragraph 168 to 174 of the Camden Geological, Hydrogeological and Hydrological Study.

#### **Stage 5 – Review and decision making**

- 4.35 The final stage of the BIA is undertaken by LB Camden and consists of an audit of the information supplied by the applicant and a decision on the acceptability of the impacts of the basement proposal. Section 8 of the Camden Geological, Hydrogeological and Hydrological Study outlines in more detail what Council officers will be looking for, as a minimum.

#### **Independent verification of basement impact assessments**

- 4.36 In order to provide the Council with greater certainty over the potential impacts of proposed basement development, we will expect an independent verification of Basement Impact Assessments to be funded by the applicant. Independent verification will be required in the following circumstances:
- Where a scheme requires applicants to proceed beyond the Screening stage of the Basement Impact Assessment (i.e. where a matter of concern has been



identified which requires the preparation of a full Basement Impact Assessment);

- Where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow; or
- For any other basement applications where the Council feels that independent verification would be appropriate (e.g. where conflicting evidence is provided in response to a proposal).

4.37 This independent verification will be commissioned by the Council.

### **Basement construction plans**

4.38 In some circumstances the Council may require a basement construction plan secured through a Section 106 Agreement. The Council may require provision of a basement construction plan when the proposed development involves excavation or construction that if improperly undertaken could cause damage to neighbouring properties. In most instances this will be on larger and more complex basement schemes and where excavation is close to neighbouring buildings and structures or involve listed buildings.

4.39 A basement construction plan sets out detailed information to demonstrate how the design and construction of the basement has been prepared in order to minimise the impacts on neighbouring properties and the water environment, and provides a programme of measures to be undertaken by the owner to with the objective of minimise the impact on the structural integrity of neighbouring properties and sensitive structures such as the public highway.

4.40 A basement construction plan should contain:

- a method statement detailing the proposed method of ensuring the safety and stability of neighbouring properties throughout the construction phase including temporary works sequence drawings,
- appropriate monitoring including details of risk assessment thresholds and contingency measures,
- detail demonstrating that the basement has been designed using evidence of local factors including ground conditions, the local water environment and the structural condition of neighbouring properties, in order to minimise the impact on them.
- provision to retain at the property throughout the construction phase a suitably qualified engineer from a recognised relevant professional body to monitor, inspect, and approve the permanent and temporary basement construction works, and
- measures to ensure the ongoing maintenance and upkeep of the basement.

4.41 The basement construction plan should ensure that:

- a suitably qualified and experienced engineer has agreed the design,
- the modelling of ground conditions and water environment is appropriately conservative; and
- best endeavours are undertaken to prevent any impact on the structural integrity of the neighbouring properties.

4.42 Prior to final submission to the Council for approval, basement construction plans will need to be certified by a suitably qualified and experienced engineer who is independent of the design team. The certification will need to be funded by the applicant.

## Principal impacts of basements in Camden

- 4.43 This section sets out the principal impacts that basement development can have upon the built and natural environment, and neighbour amenity. Each of these impacts should be considered when undertaking the Basement Impact Assessment, particularly stages 1 and 2: Screening and Scoping (see Paragraphs 2.12 to 2.19 of this report).

### **GROUNDWATER FLOW –**

The movement of water that travels and seeps through soil and rock underground.

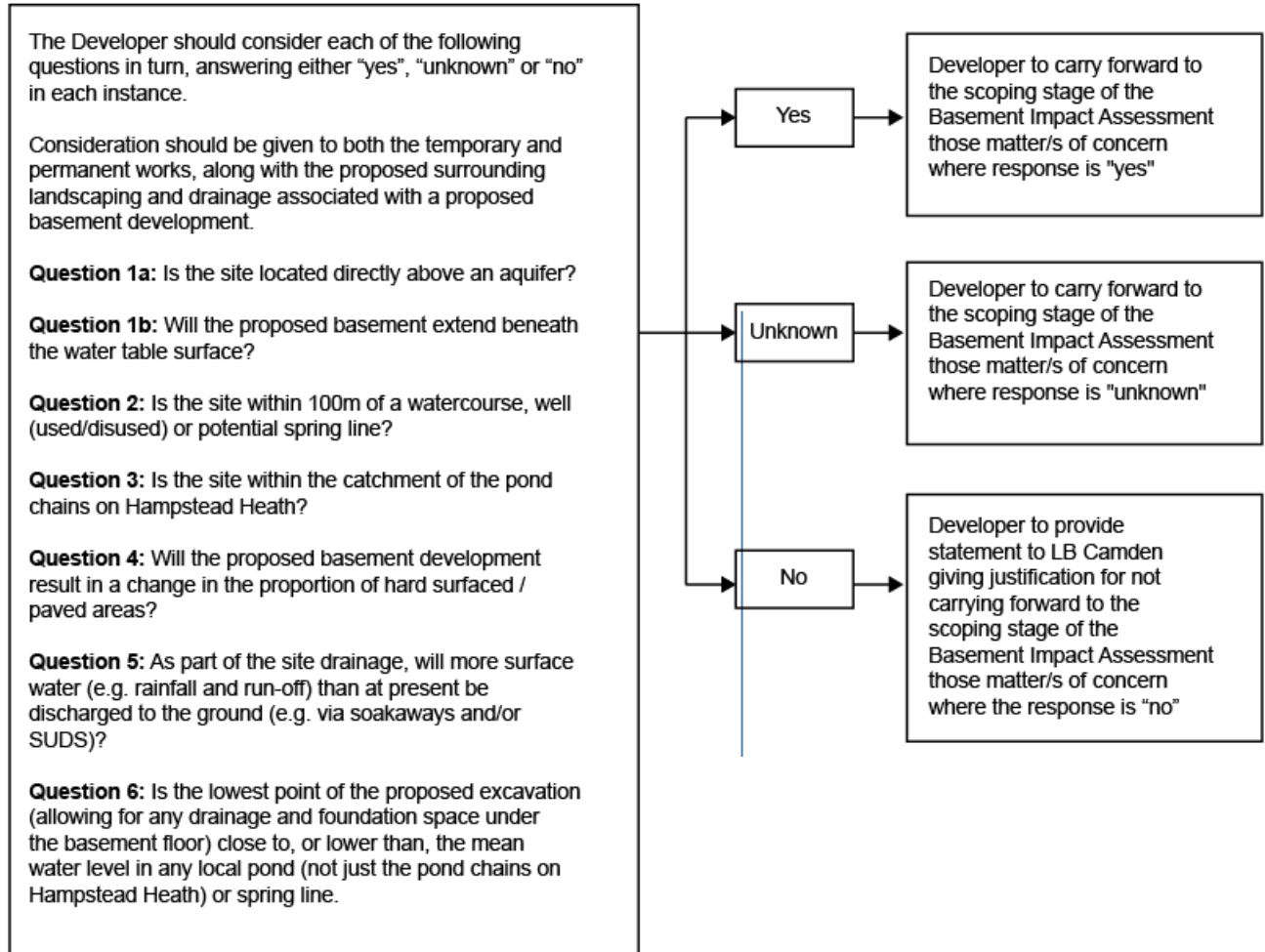
### **HYDROGEOLOGY –**

The study of groundwater moving through soils and rock formations.

## Groundwater flow

- 4.44 Basement development may affect groundwater flows, and even though the displaced water will find a new course around the area of obstruction this may have other consequences for nearby properties, trees, etc. Given the nature of the ground in many higher parts of the borough, or those where streams once flowed, basement development may have the potential to divert or displace groundwater which can cause a rise in groundwater and cause flooding, upstream of the development, whilst immediately downstream the groundwater level may decline, which may affect wells, springs and ponds. Figure 23 of the Camden Geological, Hydrogeological and Hydrological Study sets out diagrammatically the potential impacts.
- 4.45 Applicants should consider the flowchart below to determine whether or not to carry forward to the scoping stage of the Basement Impact Assessment. Where certain factors are present or proposed, for example geological setting, proximity to Hampstead Heath Ponds catchment, or an intention to undertake dewatering as part of the site works, this flowchart will identify that a hydrogeological assessment will be required. If this is the case, it should be prepared by:
- A Hydrologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London; and
  - A Fellow of the Geological Society of London.
- 4.46 The Camden Geological, Hydrogeological and Hydrological Study contains a number of maps and plans relevant to groundwater flow, including:
- Figures 2 and 3 showing geology for the whole borough;
  - Figure 4 which shows the geology for Hampstead Heath;
  - Figure 5 showing the geology for the south of the borough;
  - Figure 11 which maps the water courses within and around the borough; and
  - Figure 14 which identifies Hampstead Heath surface water catchments and drainage.

Figure 12. Subterranean (ground water) flow screening chart



**SUBTERRANEAN (GROUND WATER) FLOW SCREENING CHART****NOTES AND SOURCES OF INFORMATION**

**Question 1:** In LB Camden, all areas where the London Clay does not outcrop at the surface are considered to be an aquifer. This includes the River Terrace Deposits, the Claygate Member and the Bagshot Formation. The location of the geological strata can be established from British Geological Survey maps (e.g. 1:50,000 and 1:10,000 scale). Note that the boundaries are indicative and should be considered to be accurate to  $\pm 50\text{m}$  at best.

Additionally, the Environment Agency (EA) "Aquifer Designation Maps" can be used to identify aquifers. These can be found on the "Groundwater maps" available on the EA website ([www.environmentagency.gov.uk](http://www.environmentagency.gov.uk)) follow "At home & leisure" > "What's in Your Backyard" > "Interactive Maps" > "Groundwater". Knowledge of the thickness of the geological strata present and the level of the groundwater table is required. This may be known from existing information (for example nearby site investigations), however, it may not be known in the early stages of a project. Determination of the water table level may form part of the site investigation phase of a BIA.

**Question 2:** Watercourses, wells or spring lines may be identified from the following sources:

- Local knowledge and/or site walkovers
- Ordnance Survey maps (e.g. 1:25,000 or 1:10,000 scale). If features are marked (they are not always) the following symbols may be present: W; Spr; water is indicated by blue colouration. (check the key on the map being used)
- British Geological Survey maps (e.g. 1:10,000 scale, current and earlier editions). Current maps will show indicative geological strata boundaries which are where springs may form at the ground surface; of relevance are the boundary between the Bagshot Formation with the Claygate Member and the Claygate Member with the London Clay. Note that the boundaries are indicative should be considered to be accurate to  $\pm 50\text{m}$ . Earlier geological maps (e.g. the 1920's 1:10560 scale) maps show the location of some wells.
- Aerial photographs
- "Lost Rivers of London" by Nicolas Barton, 1962. Shows the alignment of rivers in London and their tributaries.
- The British Geological Survey (BGS) GeoIndex includes "Water Well" records. See [www.bgs.ac.uk](http://www.bgs.ac.uk) and follow "Online data" > "GeoIndex" > "Onshore GeoIndex".
- The location of older wells can be found in well inventory/catalogue publications such as "Records of London Wells" by G. Barrow and L. J. Wills (1913) and "The Water Supply of the County of London from Underground Sources" by S Buchan (1938).
- The Environment Agency (EA) "Source Protection Zone Maps" can be used to identify aquifers. These can be found on the "Groundwater maps" available on the EA website ([www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)) follow "At home & leisure" > "What's in Your Backyard" > "Interactive Maps" > "Groundwater".
- The EA hold records of licensed groundwater abstraction boreholes. LB Camden is within the North East Area of the
- Thames Region. Details can be found on the EA website.
- LB Camden Environmental Health department may hold records of groundwater wells in the Borough.

Where a groundwater well or borehole is identified, it will be necessary to determine if it is extending into the Lower Aquifer (Chalk) or the Upper Aquifer (River Terrace Deposits, Bagshot Formation, Claygate

Member etc.). It is water wells extending into the Upper Aquifer which are of concern with regard to basement development.

**Question 3:** Figure 14 in the attached study, (prepared using data supplied by the City of London Corporation's hydrology consultant, Haycocks Associates) shows the catchment areas of the pond chains on Hampstead Heath.

**Question 4:** This will be specific to the proposed development and will be a result of the proposed landscaping of areas above and surrounding a proposed basement.

**Question 5:** This will be specific to the proposed development and will be a result of the chosen drainage scheme adopted for the property.

**Question 6:** The lowest point will be specific to the proposed development. Knowledge of local ponds may be taken from

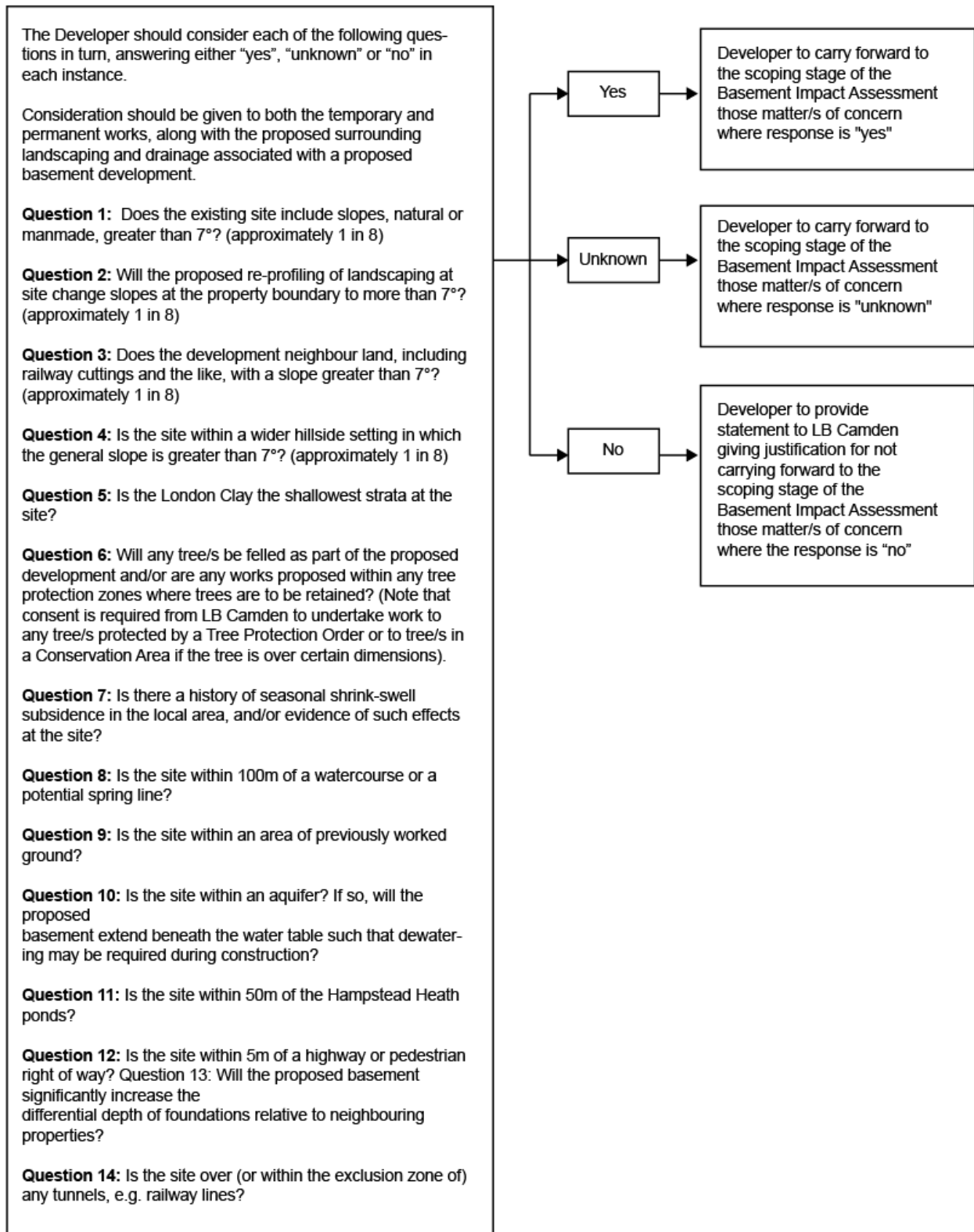
- Local knowledge and/or site walkovers
- Ordnance Survey maps (e.g. 1:25,000 or 1:10,000 scale). If features are marked (they are not always) the following symbols may be present: W; Spr; water is indicated by blue colouration. (check the key on the map being used)
- Aerial photographs

**Land stability****LAND STABILITY –**

Steep areas and a change in geological layers can have vulnerable land stability.

- 4.47 The Council will expect all basement development applications to provide evidence that the structural stability of adjoining or neighbouring buildings is not put at risk. In the first instance applicants should consider the screening flowcharts to determine whether to progress to the scoping stage of the Basement Impact Assessment. If so, it should be prepared by:
- A Civil Engineer with the “CEng” (Chartered Engineer) qualification from the Engineering Council and specialising in ground engineering;
  - A Member of the Institution of Civil Engineers (“MICE”) and a Geotechnical Specialist as defined by the Site Investigation Steering Group; or
  - A Chartered Member of the Institute of Structural Engineers with some proof of expertise in engineering geology, with demonstrable evidence that the assessments have been made by them in conjunction with an Engineering Geologist with the “cGeol” (Chartered Geologist) qualification from the Geological Society of London.
- 4.48 For listed buildings, or properties adjoining or adjacent to listed buildings, we will require a structural stability report before we validate applications.
- 4.49 The Camden Geological, Hydrogeological and Hydrological Study contains a number of maps and plans relevant to land stability, including:
- Figures 2 and 3 showing geology for the whole borough;
  - Figure 4 which shows the geology for Hampstead Heath;
  - Figure 5 showing the geology for the south of the borough;
  - Figure 11 which maps the water courses within and around the borough;
  - Figure 16 which is a land stability slope angle map; and
  - Figure 17 which outlines areas of significant landslide potential.

Figure 13. Slope stability screening flowchart



### SLOPE STABILITY SCREENING FLOWCHART NOTES AND SOURCES OF INFORMATION

**Question 1, 3 & 4:** The current surface slope can be determined by a site topographical survey. Slopes may be estimated from

1:25,000 OS maps, however in many urban areas such maps will not show sufficient detail to determine surface slopes on a property-by-property scale, just overall trends. With regard to slopes associated with infrastructure, e.g. cuttings, it should be ensured that any works do not impact on critical infrastructure.

**Question 2:** This will be specific to the proposed development and will be a result of the proposed landscaping of areas above and surrounding a proposed basement.

**Question 5:** The plan footprint of the outcropping geological strata can be established from British Geological Survey maps (e.g. 1:50,000 and 1:10,000 scale). Note that the boundaries are indicative and should be considered to be accurate to  $\pm 50\text{m}$  at best.

**Question 6:** this is a project specific determination, subject to relevant Tree Preservation Orders etc.

**Question 7:** this can be assessed from local knowledge and on-site observations of indicative features, such as cracking, Insurance firms may also give guidance, based on post code. Soil maps can be used to identify high-risk soil types. Relevant guidance is presented in BRE Digest 298 "Low-rise building foundations: the influence of trees in clay soils" (1999); BRE Digest 240 "Low-rise buildings on shrinkable clay soils: part 1" (1993); and BRE Digest 251 "Assessment of damage in low-rise buildings" (1995).

**Question 8:** Watercourses or spring lines may be identified from the following sources:

- Local knowledge and/or site walkovers
- Ordnance Survey maps (e.g. 1:25,000 or 1:10,000 scale). If features are marked (they are not always) the following symbol may be present "Spr"; water is indicated by blue colouration. (check the key on the map being used)
- Geological maps will show indicative geological strata boundaries which are where springs may form at the ground surface; of relevance are the boundary between the Bagshot Formation with the Claygate Member and the Claygate Member with the London Clay. Note that the boundaries are indicative should be considered to be accurate to  $\pm 50\text{m}$  at best. British Geological Survey maps (e.g. 1:10,000 scale, current and earlier editions).
- Aerial photographs
- "Lost Rivers of London" by Nicolas Barton, 1962. Shows the alignment of rivers in London and their tributaries.

**Question 9:** Worked ground includes, for example, old pits, brickyards, cuttings etc. Information can be gained from local knowledge and/or site walkovers, and from historical Ordnance Survey maps (at 1:25,000 or 1:10,000 scale, or better) and British Geological Survey maps (at 1:10,000 scale, current and earlier editions). Earlier geological maps (e.g. the 1:10560 scale series from the 1920s) include annotated descriptions such as "old pits", "formerly dug", "brickyard" etc.

**Question 10:** In LB Camden, all areas where the London Clay does not outcrop at the surface are considered to be an aquifer.

This includes the River Terrace Deposits, the Claygate Member and the Bagshot Formation. The general footprint of the geological strata can be assessed from British Geological Survey maps (e.g. 1:50,000 and



1:10,000 scale). Note that the boundaries are indicative and should be considered to be accurate to  $\pm 50\text{m}$  at best.

The Environment Agency (EA) Aquifer Designation Maps can be used to identify aquifers. These are available from the EA website ([www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)), by clicking on 'At home & leisure' > 'What's in Your Backyard' > 'Interactive Maps' > 'Groundwater'. Details are required of the thickness of the geological strata present and the level or depth of the groundwater table. This may be known from existing information (for example nearby site investigations); however, it may not be known in the early stages of a project. Determination of the water table level may form part of the site investigation phase of a BIA and may require specialist advice to answer. Depth of proposed development is project specific.

**Question 11:** From local knowledge and/or site walkovers, and from Ordnance Survey maps (e.g. 1:25,000 or 1:10,000 scale). In relation to the stability and integrity of the pond structures and dams, the guidance of a Panel Engineer should be sought. (Details of Panel Engineers can be found on the Environment Agency website: <http://www.environmentagency.gov.uk/business/sectors/64253.aspx>). Duty of care needs to be undertaken during any site works in the vicinity of the ponds.

**Question 12:** From local knowledge and/or site walkovers, and from Ordnance Survey maps (e.g. 1:25,000 or 1:10,000 scale). Any works should not impact on critical infrastructure.

**Question 13:** From local knowledge and/or site walkovers. May find some details on neighbouring properties from searches of LB Council databases, e.g. planning applications and/or building control records.

**Question 14:** From local knowledge and/or site walkovers, from Ordnance Survey maps (e.g. 1:25,000 or 1:10,000 scale) and directly from those responsible for tunnels (e.g. TfL or Network Rail). Any works should not impact on critical infrastructure.

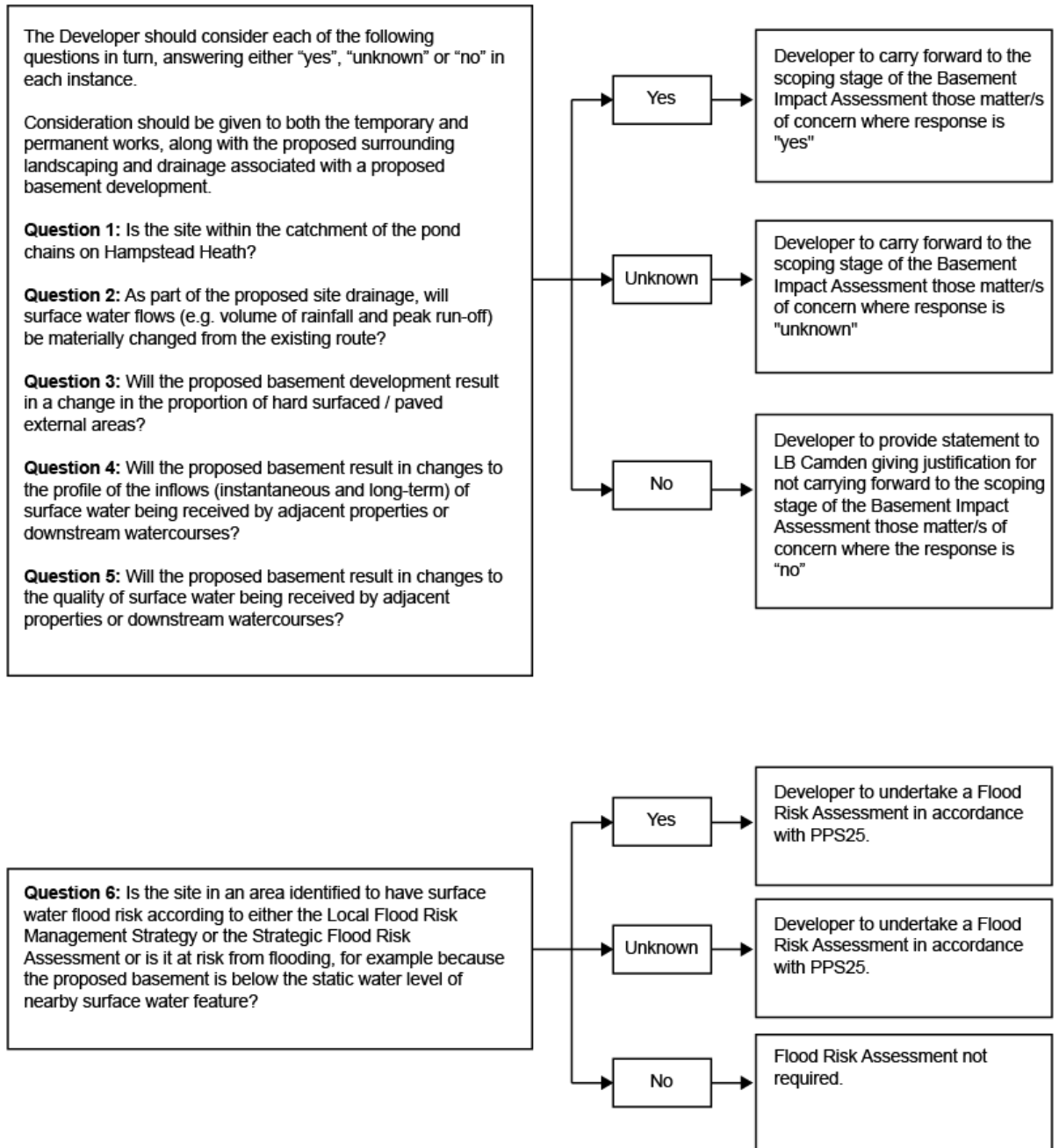
### Surface flow and flooding

- 4.50 While nowhere in the borough is identified by the Environment Agency as being flood prone from rivers or the sea, there are still parts that are identified as being subject to localised flooding from surface water. This is caused during times of heavy rainfall when the local combined sewer system is unable to deal with the volume and rate of flow. Detailed modelling suggests that areas of West Hampstead, Hampstead Town and South Hampstead are at a higher risk of surface water floods, with some risk in Highgate and Gospel Oak.
- 4.51 All applications for a basement extension within flood risk areas identified in the LB Camden Flood Risk Management Strategy or in any future updated Strategic Flood Risk Assessment will be expected to include a Flood Risk Assessment. In line with Local Plan policy A5 on basements, the Council will not allow habitable rooms and other sensitive uses for self contained basement flats and other underground structures in areas at risk of flooding.
- 4.52 Applicants should consider the flowchart below to determine whether to proceed to the scoping stage of the Basement Impact Assessment and whether a Flood Risk Assessment should be undertaken as part of this. For surface flow and flooding issues the Basement Impact Assessment should be undertaken by a Hydrologist or a Civil Engineer specialising in flood risk management and surface water drainage, with either:

- The “CEng” (Chartered Engineer) qualification from the Engineering Council; or a Member of the Institution of Civil Engineers (“MICE); or
- The “C.WEM” (Chartered Water and Environmental Manager) qualification from the Chartered Institution of Water and Environmental Management.

4.53 Figure 14 within the Camden Geological, Hydrogeological and Hydrological Study identifies Hampstead Heath surface water catchments and drainage.

Figure 14. Surface flow and flooding screening flowchart



**SURFACE FLOW AND FLOODING SCREENING FLOWCHART  
NOTES AND SOURCES OF INFORMATION**

**Question 1:** Figure 14 in the Camden geological, hydrogeological and hydrological study (prepared using data supplied by the City of London Corporation's hydrology consultant, Haycocks Associates) shows the catchment areas of the pond chains on Hampstead Heath

**Question 2:** This will be specific to the proposed development and will be a result of the proposed landscaping of areas above and surrounding a proposed basement. The developer should provide documentation of discussion with Thames Water to confirm that the sewers have capacity to receive any increased wastewater flows.

**Question 3:** This will be specific to the proposed development and will be a result of the chosen drainage scheme adopted for the property

**Question 4:** This will be specific to the proposed development and will be a result of the proposed landscaping and chosen drainage scheme adopted for the property. SUDS will be required to compensate any increases in peak flow.

**Question 5:** This will be specific to the proposed development and will be a result of the proposed landscaping and chosen drainage scheme adopted for the property. SUDS will be required to compensate any increases in peak flow.

**Question 6:** The principles outlined in the NPPF and the Planning Practice Guidance should be followed to ensure that flood risk is not increased.

- 4.54 Basement development should not displace ground water or surface water flow so it causes flooding on nearby sites or those further away. The Council will require an adequate drainage plan and has a preference for the use of Sustainable Urban Drainage Systems (SUDS). Only where this cannot be achieved should surface/ground water be discharged to combined sewers (refer to the chapter on water efficiency in the Camden Planning Guidance on Sustainability and Local Plan Policy CC3 Water and flooding).

**SUSTAINABLE URBAN DRAINAGE SYSTEMS (SUDS) –**

Low environment impact approaches to drain away dirty water and surface water run-off through collection, storage, and cleaning before allowing it to be released slowly back into the environment, thereby preventing flooding, pollution and contamination of groundwater.

## 5 Impacts on neighbours from demolition and construction

- 5.1 The demolition and construction phases of a development have the potential to harm the amenity of neighbours, and this is particularly so for basement development. Although this is temporary, demolition and construction can create noise, vibration, dust, air and light pollution, and can last for lengthy periods of time.

### Considerate Constructors Scheme

- 5.2 Full care and consideration should be given to neighbouring properties, as the works can be particularly intrusive to immediate neighbours. All construction and demolition processes are expected to be in accordance with the Considerate Constructors Scheme standards. Construction and demolition processes are also expected to conform to the ICE Demolition Protocol ([www.ice.org.uk](http://www.ice.org.uk)) and should have regard to the [Guide for Contractors working in Camden](#), Feb 2008, which is available on the Camden Council website and to the GLA's best practice guidance document The Control of Dust and Emissions from Construction and Demolition (<https://www.london.gov.uk/file/18750/>).

#### **CONSIDERATE CONSTRUCTORS SCHEME –**

Aims to ensure that contractors carry out their operations in a safe and considerate manner, with due regard to local residents and businesses, passing pedestrians and road users.

#### **DEMOLITION PROTOCOL –**

Provides a framework for sustainability in construction, demolition and refurbishment projects.

### Construction management plans

- 5.3 The Council will generally require a construction management plan for basement developments to manage and mitigate the greater construction impacts of these schemes. Construction management plans will generally be required for schemes on constrained sites, in conservation areas, on sites adjacent to a listed building, or in other areas depending on the scale of the development and the conditions of the site. Construction management plans should cover the following:
- provisions for phasing;
  - provisions for site management, safety, and supervision,
  - management of construction traffic and parking;
  - management of noise, vibration, dust, and waste;
  - provisions to ensure stability of buildings and land;
  - provisions for monitoring movement, and
  - provisions for a construction working group (for projects where there will be a need for ongoing consultation with the affected neighbours through the construction phase e.g. long, complex projects).

- 5.4 Construction management plans should take into consideration other developments taking place in the local area with a view to minimising the combined effects of construction works. The Council encourages applicants to inform and engage with affected neighbours at an early stage.
- 5.5 In considering applications, the Council will ensure that schemes minimise the harmful impacts of construction on the building and on local amenities. Construction management plans should consider the recommendations from the Camden Geological, Hydrogeological and Hydrological Study. See the Camden Planning Guidance on Amenity for more information on Construction Management Plans.

### **Working hours – noisy construction and Saturday working**

- 5.6 Noise and other disturbance to neighbours caused by basement construction is a serious concern in the borough. Working hours in Camden are set by the [Guide for Contractors Working in Camden and Camden's Minimum Requirements for Construction Management Plans \(CMPs\)](#). The working hours are:
- Mondays to Fridays - 8am to 6pm
  - Saturdays - 8am to 1pm
  - Sundays and Bank Holidays - No noisy work
- 5.7 The Minimum Requirements for Construction Management Plans document states that the working hours are Camden's standard times. However, the times incorporated into a CMP should be specific to the site and related to the type of work being carried out. It notes there may be occasions where the times should be shorter and with break out/rest periods. In areas where there is a post examination Neighbourhood Plan developers should follow any recommendations on construction working hours for basement development set out in that Plan. You can check if your site is in a neighbourhood plan area on the Camden Policies Map or through the link below:
- [www.camden.gov.uk/neighbourhoodplanning](http://www.camden.gov.uk/neighbourhoodplanning)
- 5.8 In all other areas, when developing construction management plans for basements developers should consult with the neighbours affected by basement development. As part of this consultation developers should ask affected neighbours as to whether they would like to restrict noisy working on Saturdays. Limiting working hours on Saturdays will allow people to enjoy a noise free weekend but will increase the overall length of the construction period. Where affected neighbours would like no noisy construction work to take place on Saturday developers should agree to this as part of their construction management plan.

### **Processing and monitoring fees**

- 5.9 Please note that processing and monitoring fees apply for Section 106 agreements - see Camden Planning Guidance on planning obligations for further details.

## **Sustainable construction**

- 5.10 As part of an application for a basement development, applicants will be required to describe within their Design and Access Statement how the development has considered materials, resources and energy. This statement should explain how the use of sustainable materials has been considered and applied in the proposal, and the reasons for the choices that are made. The statement should also detail which existing materials on the site are to be re-used as part of the development or made available for re-use elsewhere, and the measures to improve the energy efficiency of the development. Further guidance is provided within the Camden Planning Guidance on sustainability (see sustainability assessment tools).

### **DESIGN AND ACCESS STATEMENT –**

A report supporting a planning application that justifies the design principles and concepts of the scheme, and explains how issues relating to access have been dealt with. The level of detail depends on the scale and complexity of the application.

## 6 Other permits and requirements

### Building regulations

- 6.1 A Building Regulations application is required when converting an existing basement to habitable use, excavating a new basement or extending an existing basement. Due to the nature of the work, in which different problems can arise, it is advised that the “deposit of plans route” is adopted to obtain building regulation approval. This is the most widely known procedure and involves you submitting plans which show full details of the work. These plans are then checked for compliance with the Building Regulations and, if satisfactory, an Approval Notice is issued.

#### **BUILDING REGULATIONS APPLICATION –**

The Building Regulations apply to most ‘building work’ and there is a need to make an application to the Council’s Building Control team or an approved inspector before proceeding. Further details are available from the Building Control section of the Council’s website.

- 6.2 The Council recommends that you follow the full plans procedure unless the work is of a very minor nature. The Full Plans procedure gives greater protection to the building owner.
- 6.3 As part of the application it will be necessary to submit a full site investigation and a consulting civil or structural engineers report on the investigation and development proposals.
- 6.4 Building Regulations are set out by various technical parts (A-P) and the principal requirements include the following:
- Part A Structure
  - Part B Fire Safety
  - Part C Site preparation and resistance to contaminants and moisture
  - Part E Resistance to passage of sound
  - Part F Ventilation
  - Part H Drainage
  - Part J Combustion appliances
  - Part K Protection from falling collision and impact
  - Part L Conservation of fuel and power
  - Part M Access and use of building
  - Part P Electrical safety
- 6.5 The above are available to be viewed on the Department for Communities and Local Government website [www.communities.gov.uk](http://www.communities.gov.uk). Additional guidance can be obtained from the Approved Document: Basements for Dwellings 2nd edition 2004 (although superseded this provides the framework for satisfying the building regulations).

### Highway licence

- 6.6 If there is a need to put a skip or building material on the public highway, or erect a scaffold, hoarding or gantry an application for a license under the Highways Act will be needed. Applicants will also need to obtain the consent of the appropriate highway authority if their proposal involves any work under any part of the highway or footway. The Council is the



highway authority for most streets in the Borough, although for some major roads Transport for London is the highway authority. For more information about the highway authority or licensing matters, please visit the Council's website at the links below.

- Transport and streets (general page) – [www.camden.gov.uk/ccm/navigation/transport-and-streets/](http://www.camden.gov.uk/ccm/navigation/transport-and-streets/)
- Skip licences – [www.camden.gov.uk/skips](http://www.camden.gov.uk/skips)
- Parking bay and suspensions – [www.camden.gov.uk/ccm/navigation/transport-and-streets/parking/parking-bay-suspensions/](http://www.camden.gov.uk/ccm/navigation/transport-and-streets/parking/parking-bay-suspensions/)
- Applications to place building materials on the highway – [www.camden.gov.uk/ccm/content/business/business-regulations/licensing-and-permits/licenses/skips-materials-and-building-licenses/material-licenses/](http://www.camden.gov.uk/ccm/content/business/business-regulations/licensing-and-permits/licenses/skips-materials-and-building-licenses/material-licenses/)

### Approval in principle

- 6.10 If the basement construction is immediately adjacent to the public highway or in close proximity to the edge of the public highway, then an Approval in Principle will have to be submitted to the Council. In the first instance, email [structuresworks@camden.gov.uk](mailto:structuresworks@camden.gov.uk) outlining the nature of the proposed structure and to provide outline drawings which clearly show the extent of the structure relative to the public highway. An Engineer from the Camden's Structures Team will then make contact to arrange a meeting and explain the process further.

### Party wall award

- 6.11 For most basement developments applicants will need a party wall award (sometimes referred to as party wall agreements) with their neighbour(s). This includes when excavation is:
- within 3 metres of a neighbouring structure;
  - would extend deeper than that structure's foundations; or
  - within 6 metres of the neighbouring structure and which also lies within a zone defined by a 45 degree line from that structure.
- 6.12 The Council is not itself involved in Party Wall awards, but a guidance note explaining the procedures can be found on the Council's website or from the Planning Portal website [www.planningportal.gov.uk](http://www.planningportal.gov.uk).

### Security for expenses

- 6.13 The Party Wall Etc. Act 1996 allows adjoining owners to request the building owner to provide a bond or insurances to provide security in the event of a dispute. The money remains the building owner's throughout but can be drawn upon to pay for rebuilding or repair in certain circumstances. Given the complex nature of some basement development the Council encourages applicants to proactively offer this security for expenses to owners of nearby properties both in party wall awards and also when the scheme would not trigger the need for a party wall award.

- 6.14 The Council strongly recommends that Party Wall agreements are concluded prior to the applicant seeking the Council's approval of the Basement Construction Plan (BCP). This allows for the specific issues relating to the construction programme to be established, meaning neighbours are better informed before entering into a Party Wall agreement in connection with the proposed basement scheme.

### **Freeholder permission**

- 6.15 Most residential leases will require some form of landlord permission for improvements and alterations. This is also the case for leasehold Housing Revenue Account (HRA) property, where permission from Camden's Housing Department is required for any improvements and alterations, including basement development. Further information for leaseholders can be found here:

<https://www.camden.gov.uk/ccm/content/contacts/councilcontacts/housing/contact-leaseholder-services/>

### **Flooding and positively pumped devices (PPDs)**

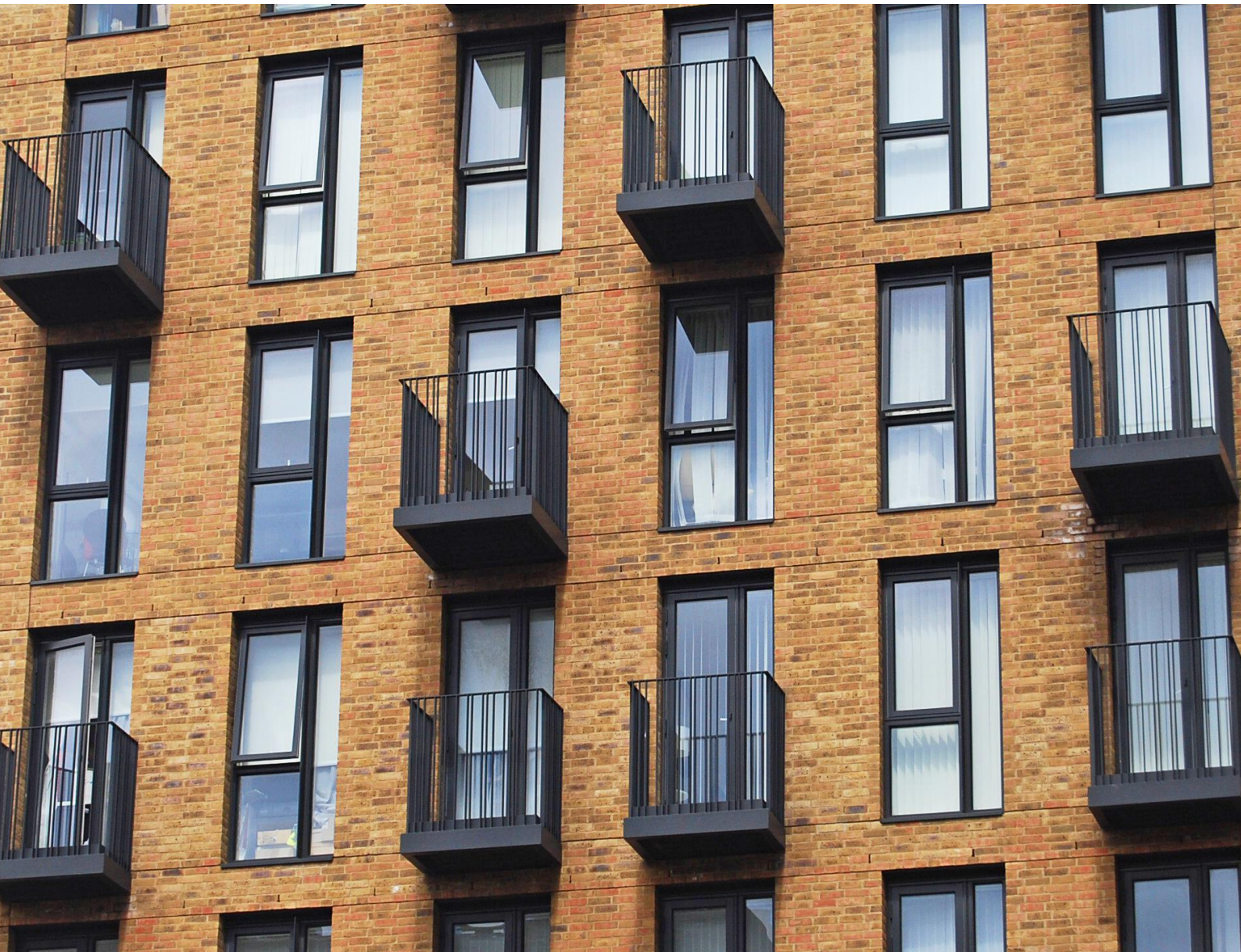
- 6.16 As sewers are designed to surcharge to just below cover level, basement and other subterranean development is at risk of flooding with sewage. In accordance with advice from Thames Water and to protect against flooding the Council will ensure that all basement and other subterranean development is protected from sewer flooding by the installation of a positive pumped device.



Camden Planning Guidance

# Interim Housing CPG

March 2018





## Draft Interim Housing CPG

1	Introduction.....	5
2	Affordable housing and housing in mixed use development ....	9
3	Student Housing.....in Housing CPG 2016	
4	Residential development standards.....	60
5	Lifetime Homes and Wheelchair Housing .....incorporated into Section 4	
6	Development involving net loss of homes .....in Housing CPG 2016	



# 1 Introduction

*This section forms the introduction to the Interim Housing CPG. Similar paragraphs have also be inserted in the Housing CPG 2016 to replace paragraphs 1.1 to 1.7.*

## What is Camden Planning Guidance?

- IH1.1 We have prepared this Interim Camden Planning Guidance (CPG) on Housing to support the policies in the Camden Local Plan 2017. This guidance forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions
- IH1.2 The Council formally adopted the original CPG2 Housing on 6 April 2011 following statutory consultation. The Camden Planning Guidance documents (CPG1 to CPG8) replaced Camden Planning Guidance 2006.
- IH1.3 The original CPG2 Housing has been subject to four updates:
- 4 September 2013 following statutory consultation in November to December 2012;
  - 17 July 2015 following statutory consultation in March to April 2015;
  - 6 May 2016 following statutory consultation in February to April 2016 (referred to in this document as the Housing CPG 2016);
  - 26 March 2018 following statutory consultation in November 2017 to January 2018.
- Details on these updates and the consultation process are available at [camden.gov.uk/cpg](http://camden.gov.uk/cpg).
- IH1.4 The final update followed the adoption of the Camden Local Plan in 3 July 2017. This latest update deleted some parts of the Housing CPG 2016, and replaced them with this separate volume of Interim Housing CPG. This interim guidance will be incorporated into a new set of Camden Planning Guidance documents as part of a wider review expected to take place in 2018.
- IH1.5 This document should be read alongside the retained paragraphs of the Housing CPG 2016. Notes have been added to the Housing CPG 2016 to indicate paragraphs that have been deleted or replaced by this Interim Housing CPG.
- IH1.6 The Interim Housing CPG has been produced because:
- there are a number of policy changes emerging at regional and national level that would quickly have overtaken and superseded a full review of CPG2 if it had taken place in autumn 2017;
  - emerging policy changes include the Government's revised National Planning Policy Framework – including new affordable housing definitions; but



- some elements of CPG2 needed to be replaced quickly to guide implementation of new policies in the Camden Local Plan 2017 that are substantially different from earlier policies.

- IH1.7 The Interim Housing CPG is consistent with the Camden Local Plan 2017. The Camden Local Plan 2017 has greater statutory weight than the Interim Housing CPG, and where there is any apparent conflict between Interim Housing CPG and the Local Plan, the Local Plan will prevail.
- IH1.8 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 the Camden Local Plan 2017.

### **What does this guidance cover?**

- IH1.9 This guidance provides information on all types of housing development within the borough. It provides specific guidance on:
- Affordable housing and housing in mixed use development - see also Housing CPG 2016 (information on the split between the documents is provided in paragraph IH2.2 of this guidance)
  - Residential development standards (including accessibility)
- IH1.10 The retained paragraphs of Housing CPG 2016 provide specific guidance on:
- other aspects of Affordable housing and housing in mixed use development (information on the split between the documents is provided in paragraph IH2.2 of this guidance)
  - Student housing
  - Development involving a net loss of homes
- IH1.11 Taken together, Housing CPG 2016 and this Interim Housing CPG highlight the Council's requirements and guidelines which support the Camden Local Plan 2017 policies:
- G1 – Delivery and location of growth
  - H1 - Maximising housing supply
  - H2 - Maximising the supply of self-contained housing from mixed use schemes
  - H3 - Protecting existing homes
  - H4 - Maximising the supply of affordable housing
  - H5 - Protecting and improving affordable housing
  - H6 – Housing choice and mix
  - H7 - Large and small homes

- H8 - Housing for older people, homeless people and vulnerable people
- H9- Student housing
- H10 - Housing with shared facilities
- A1 - Managing the impact of development
- D1 - Design



## 2 Affordable housing and housing in mixed use development

*This sub-section replaces the Key Messages and paragraphs 2.1 to 2.5 in Section 2 of the Housing CPG 2016. A paragraph similar to paragraph IH2.2 has also be inserted in the Housing CPG 2016.*

### KEY MESSAGES

- We will encourage the inclusion of self-contained homes in non-residential development
- We will require 50% of additional floorspace to be self-contained housing in development involving more than 200 sq m GIA additional floorspace in the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road
- Affordable housing includes social and affordable rented housing and intermediate housing
- We expect a contribution to affordable housing from all developments that provide one additional home or more and involve a total additional residential floorspace of 100 sq m GIA or more
- An affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings
- A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity
- For developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site
- Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing
- Affordable housing should include a large proportion of family homes and contribute to creating mixed and inclusive communities

IH2.1 The guidance on affordable housing and housing in mixed-use development primarily relates to Camden Local Plan Policies H2 - *Maximising the supply of self-contained housing from mixed-use schemes*, H4 – *Maximising the supply of affordable housing*, H5 - *Protecting and improving affordable housing*, and H7 - *Large and small homes*.

IH2.2 The guidance is divided into a number of subsections. Each subsection deals with a different question relating to requirements for affordable housing and housing in mixed-use development. They are split between this interim guidance and the remaining paragraphs of Housing CPG 2016 as follows:

- what is affordable housing? – included in this document

- which developments should include self-contained housing as part of a mix of uses? – included in this document
- which developments should contribute to affordable housing? – included in this document
- how should affordable housing be provided? – included in this document
- how much affordable housing do we expect? – included in this document
- how much housing and affordable housing do we expect as part of a mix of uses – included in this document
- what types of affordable housing do we expect? – included in this document
- how will the Council consider financial viability? – the sub-section 'Transparency and confidential viability information' is included in this document, the remainder of the section is in Housing CPG 2016
- can the market housing and affordable housing be provided off-site? – the sub-sections related to 'Payments in lieu' are included in this document, the remainder of the section is in Housing CPG 2016

- IH2.3 The property market, development finance and affordable housing funding have all been subject to considerable change since 2007, and it is likely that change will continue.
- IH2.4 The implementation of planning policy will need to respond to these changes. Implementation guidance therefore needs to be more readily reviewed and amended than would be possible within the Camden Local Plan.
- IH2.5 The Government has indicated that it intends to published a revised National Planning Policy Framework in 2018. In addition, the Mayor of London is reviewing the London Plan and Supplementary Planning Guidance. A comprehensive review of CPG2 is not considered expedient at this stage as the ongoing national and regional policy changes would be likely to make the reviewed guidance out of date. This guidance will therefore continue to be subject to review as the need arises.

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

*This sub-section replaces paragraphs 2.6 to 2.11 of the Housing CPG 2016.*

- IH2.6 This guidance applies primarily to the operation of the following policies in the Camden Local Plan 2017:
- Policy H2 Maximising the supply of self-contained housing from mixed-use schemes;
  - Policy H4 Maximising the supply of affordable housing;
  - Policy H5 Protecting and improving affordable housing; and

- Policy H7 Large and small homes.

- IH2.7 A developer considering the appropriate housing type or the mix of housing and other uses on a site should contact the Council's Regeneration and Planning Division in the first instance. The Strategic Planning and Information Team can provide initial guidance on the interpretation of policies in the Camden Local Plan 2017.
- IH2.8 A formal pre-planning application advice service is available for development proposals. A fee is charged for this service on the basis of the size of the proposed development. We strongly encourage developers to use this service if they are proposing development of the type described in this section of the guidance.

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

*This sub-section replaces paragraphs 2.12 to 2.21 of the Housing CPG 2016.*

- IH2.9 Affordable housing is defined in the Government's National Planning Policy Framework (NPPF) – Annex 2 The NPPF indicates that affordable housing should:
- be provided to households whose needs are not met by the market, and
  - be provided to households who are eligible for affordable housing, taking into account local incomes and local house prices, 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.
- IH2.10 Three types of affordable housing are defined in the NPPF – these are **social rented housing, affordable rented housing** and **intermediate housing**.
- IH2.11 **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 operated by the regulator of social housing (now known as Homes England). Other affordable housing providers may manage social rented housing under the same rental arrangements.
- IH2.12 **Affordable rented housing** is housing managed by local councils and housing associations and let to households who are eligible for social rented housing. Rents are set on a scheme-by-scheme basis and are guided by local market rents rather than a national rent regime.
- IH2.13 The NPPF indicates that rents should not exceed 80% of the local market rent (including service charges where they apply). The Mayor has devised London Affordable Rent as a replacement for this product in the capital. Benchmark levels for London Affordable Rents are set out in the Mayor's in Affordable Homes Programme 2016-2021 Funding Guidance (November 2016).

- IH2.14 The Camden Local Plan 2017 follows the approach of the London Plan, and considers social rent and affordable rent together as "social-affordable rented housing". Eligibility for this type of affordable housing is assessed on the basis of the Council's Housing Allocation Scheme 2016 (as amended), which is available at:  
<https://www.camden.gov.uk/ccm/content/housing/housing-allocation-changes-2016/>
- IH2.15 **Intermediate housing** is housing that costs more than social housing but less than equivalent market housing. Intermediate housing costs (including service charges) must also be cheap enough for eligible income groups to afford. The London Plan and the annual reviews in the London Plan Annual Monitoring Report provide details of eligible income groups.
- IH2.16 The Camden Local Plan 2017 indicates in paragraph 3.104 that the Council will generally seek intermediate rented housing rather than other forms such as shared-ownership housing. The Council adopted an Intermediate Housing Strategy on 6 April 2016, which we will take into account when considering proposals involving intermediate housing. The Council has set out priorities for offers of tenancies in intermediate rented housing in Schedule 1 of the Intermediate Housing Strategy. The Intermediate Housing Strategy is available at:  
<https://www.camden.gov.uk/ccm/navigation/housing/housing-options/intermediate-housing/>
- IH2.17 The Council will generally seek **intermediate rented housing** rather than other forms such as shared-ownership housing. The Intermediate Housing Strategy states that we will seek to ensure that the majority of intermediate housing in each scheme is affordable to households with incomes between £30,000 and £40,000 (as adjusted by wage inflation). The Council considers housing to be affordable where housing costs (including rent and service charges) take up no more than 40% of net household income (with net income assumed to be 70% of gross income). The Council will use S106 legal agreements to ensure that the cost of intermediate housing is consistent with the Intermediate Housing Strategy.

### **Which non-residential developments should include self-contained housing as part of a mix of uses?**

*This is a new sub-section included in the Interim Housing CPG.*

- IH2.18 Policy H2 of the Camden Local Plan 2017 indicates that the Council will encourage the inclusion of self-contained homes in non-residential development in all parts of the borough.
- IH2.19 Policy H2 also indicates that we will require 50% of additional floorspace to be self-contained housing in developments involving more than 200 sq m (GIA) additional floorspace in the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road. The policy contains a number of clauses that the

Council will take into account in determining whether the requirement applies to a specific scheme.

- IH2.20 Policy H2 indicates that self-contained housing should be provided on the development site, particularly where 1,000 sq m (GIA) or more of additional floorspace is proposed.
- IH2.21 Self-contained houses and flats are defined as homes where all the rooms, including the kitchen, bathroom and toilet, are behind a door that only one household can use (2011 Census Glossary of Terms). In most cases these homes fall in Use Class C3.
- IH2.22 Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought in accordance with Policy H4 Maximising the supply of affordable housing.

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

*This sub-section replaces paragraphs 2.22 to 2.31 of the Housing CPG 2016.*

- IH2.23 Policy H4 of the Camden Local Plan 2017 indicates that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sq m GIA or more, including mixed-use developments.
- IH2.24 Policy H4 also indicates that where developments have capacity for 10 or more additional dwellings, the affordable housing should be provided on site. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.
- IH2.25 Paragraphs IH2.39 to IH2.42 of this guidance explain how we will assess the capacity of a development for additional dwellings.

### **Assessing floorspace**

- IH2.26 Floorspace should be measured in accordance with the most recent edition of the RICS property management professional statement and the RICS Code of Measuring Practice where applicable, having regard to the Nationally Described Space Standard for housing.
- IH2.27 The floorspace thresholds relating to Camden Local Plan 2017 Policies H2 and H4 refer to additions to gross floorspace (and are assessed in terms of Gross Internal Area – GIA – this excludes the thickness of external walls). The policy requirements in Policy H2 are not triggered by increases in net non-residential floor space that take place wholly within the existing building envelope and do not constitute development. However, works involving a change to residential use will trigger Policy H4 affordable housing requirements where they provide one or more additional homes and involve a total addition to residential floorspace of 100 sq m GIA or more.



- IH2.28 The Camden Local Plan 2017 has adopted Gross Internal Area (GIA) to assess floorspace as it is generally available from planning application forms and/ or CIL additional information requirement form. However, Camden Planning Guidance CPG8: Planning Obligations currently provides formulae for payments in lieu of housing and affordable housing based on Gross External Area (GEA). We will therefore also expect developers to provide measurements of the Gross External Area of residential and non-residential floorspace (and the individual tenures/ uses) where the Council considers that a payment in lieu of housing or affordable housing is appropriate.
- IH2.29 Where a measurement of the Gross External Area (GEA) is not available, the Council will consider using a standard multiplier to estimate GEA and calculate the payment in lieu. Two standard multipliers are available to convert internal area to GEA. Which of these multipliers is more appropriate will depend on whether or not common areas (such as shared corridors and staircases) are excluded from the submitted measure of internal area.
- To convert to GEA where common areas and exterior walls have been excluded - multiply by 1.25.
  - To convert to GEA where only exterior walls have been excluded – multiply by 1.053.
- IH2.30 Strictly interpreted, a measurement of GIA should include the entire enclosed area of each floor of the building except for the external walls. However, in Camden, housing proposals typically relate to flats and provide aggregate GIA for individual flats, excluding the common areas as well as the external walls of the building. Consequently, where a measurement of GEA is not available, the Council will generally estimate GEA as 1.25 x GIA, unless the applicant provides evidence to show that an alternative multiplier is more appropriate.

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

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

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

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

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

The usable area within a building measured to the face of perimeter or party walls. Includes the thickness of internal partition walls, but excludes common areas and the thickness of partition walls that define the edge of common areas.

### **Specialist forms of housing (outside Use Class C3)**

- IH2.31 As indicated in the Camden Local Plan 2017, the approach to affordable housing set out in Policy H4 and in this guidance applies to all housing that is self-contained, including self-contained homes for older people (usually in Use Class C3). The approach will also apply if additional floorspace is proposed in Use Class C4 (small houses in multiple occupation) as these can be used as self-contained C3 homes without submitting a planning application.
- IH2.32 The Council will also control the affordability of specialist types of housing where appropriate, taking account of all relevant Local Plan policies. The affordability of housing for older people and vulnerable people, student housing and large houses in multiple occupation will be considered having regard to Policies H8, H9 and H10 respectively. Where the Council applies Policy H4 to specialist types of housing we may vary the mechanics of considering and securing affordable housing provision having regard to Policy H4 criteria (j) to (p).
- IH2.33 In accordance with Local Plan Policy H9 and the London Plan, the Council will seek to ensure that student housing is affordable to the student body as a whole, and in some circumstances will seek affordable student accommodation. Guidance on affordable student accommodation is provided by the Mayor of London's Housing SPG March 2016. A separate section of Camden's Housing CPG 2016 also gives more information about development of **Student Housing**.

### **How should the affordable housing be provided?**

*This is a new section included in the Interim Housing CPG.*

- IH2.34 The NPPF indicates that affordable housing should be provided to eligible households whose needs are not met by the market, and should remain at an affordable price for future eligible households, or if these restrictions are lifted, the subsidy should be recycled. The NPPF also indicates that social rented and affordable rented housing is generally let by local authorities or private registered providers (most of which are housing associations).

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

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

- IH2.35 To satisfy the stipulations of the NPPF, best meet the needs of Camden residents, and ensure that we work with registered providers who share

the Council's affordable housing priorities<sup>1</sup>, the Council has agreed an Approved Strategic Partner List. The 2017 list currently contains 17 housing providers, but will be reviewed annually. The latest list is available here: <http://camden.gov.uk/ccm/navigation/housing/housing-policy-and-strategies/>

- IH2.36 The Council will expect developers to adhere to the following arrangements where affordable housing is provided in conjunction with a private development:
- at the commencement of scheme design, the developer should contact the Council's Housing Commissioning and Partnerships Team for guidance on the types of affordable housing that the Council is currently prioritising and for advice about which of our Approved Strategic Partners would be most appropriate for the scheme;
  - at an early stage in scheme design, the developer should involve a provider from the Council's Approved Strategic Partner List in design of the affordable housing, to ensure that the homes meet the requirements of the Council, housing providers and future occupiers, and maximise the potential for grant support from the Mayor of London's Affordable Homes Programme;
  - the affordable homes should be transferred to a provider on the Approved Strategic Partner List once they are completed;
  - prior to the transfer, the developer should seek written approval of the selected housing provider by the Council – this will be secured via legal agreement; and
  - where possible, the freehold of the affordable homes should be transferred to the approved housing provider, otherwise the affordable homes should be transferred on a long lease (ideally 125 years).

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

*This sub-section replaces paragraphs 2.32 to 2.41 of the Housing CPG 2016.*

- IH2.37 Camden Local Plan Policy H4 indicates that we will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sq m GIA or more. Policy H4 also gives targets and criteria which we use to assess the appropriate contribution to affordable housing from each development. These include:

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<sup>1</sup> these priorities include, for example, securing nominations from the Council's housing register

- an overall borough target of 5,300 additional affordable homes over the Plan period, equivalent to approx 350 additional affordable homes per year;
- seeking to negotiate the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development;
- aiming to minimise social polarisation and create mixed, inclusive and sustainable communities;
- basing affordable housing targets on an assessment of development capacity whereby 100sqm GIA is generally considered to create capacity for one home;
- expecting affordable housing to be provided on site where developments have capacity for 10 or more additional dwellings;
- applying an affordable housing target of 50% of additional residential floorspace to developments with capacity for 25 or more additional homes;
- using a sliding scale to set lower affordable housing targets for developments that provide one or more additional homes and involve an addition to residential floorspace of 100sqm GIA or more but have capacity for fewer than 25 additional homes; and
- the sliding scale is explained in Policy H4 and paragraphs 3.108 to 3.110 of the Camden Local Plan 2017.

IH2.38 Government guidance seeks to limit development contributions from small-scale developers by setting a national threshold of 10 homes and 1,000 sq m which developments should exceed for affordable housing contributions to be sought. The Camden SHMA estimates the borough's requirement for additional affordable homes to be around 10,000 homes for the 15-year Plan period, compared with a Local Plan target of 5,300 additional affordable homes based on likely delivery. Given the gap between the requirements and the likely delivery, the Council has secured an exception to the national threshold through the Local Plan process. Consequently an affordable housing contribution is sought from all developments that provide one or more additional homes and involve an addition to residential floorspace of 100sqm GIA or more. The purpose of the sliding scale is to achieve the maximum reasonable contribution to affordable housing overall without deterring small-scale development.

### **Capacity and affordable housing percentage target**

IH2.39 As indicated in paragraph IH2.37 of this guidance, affordable housing targets are based on an assessment of development capacity whereby an additional residential floorspace of 100 sq m GIA is generally considered to create capacity for one additional home. Developments that involve one additional home and an addition to residential floorspace of 100 sq m GIA are considered to have capacity for one additional home. For developments of over 100 sq m GIA, each additional 100 sq m GIA added to the development is considered to

create capacity for an additional dwelling (including capacity for a share of common areas such as shared staircases, entrance halls and corridors). Provided that the development provides at least one additional home (ie it is not an extension to an additional dwelling), the number of dwellings proposed will not influence the assessment of capacity.

- IH2.40 We acknowledge that an addition of 100 sq m residential floorspace will not create capacity for an additional home in every single case. In assessing capacity, the Council will take into account any constraints that might prevent the additional area from contributing to the number of homes in the scheme (e.g. does the additional residential space have access to natural light, does it involve conversion of a Listed Building that cannot appropriately be subdivided?).
- IH2.41 We will round additional housing floorspace to the nearest 100 sq m to give capacity in terms of the nearest whole number. An additional 1,245 sq m GIA will generally have capacity for 12 additional homes, and additional 1,775 sq m will generally have capacity for 18 additional homes, and an additional 2,360 sq m GIA will generally have capacity for 24 additional homes.
- IH2.42 Local Plan Policy H4 does not apply to existing residential floorspace which is being retained or replaced as part of the development, and existing residential floorspace will not influence the assessment of development capacity. However:
- any existing affordable housing floorspace on the development site should be retained or replaced independently of the affordable housing target in accordance with Local Plan Policy H5; and
  - Policy H4 *does* apply to additional residential floorspace created by converting or redeveloping existing *non-residential* floorspace, and such floorspace will form part of the assessment of development capacity.
- IH2.43 We will use the assessment of capacity and the sliding scale to determine the affordable housing percentage target. The sliding scale is a simple straight-line scale starting with a 2% affordable housing target for a development that has capacity for one additional home. For every further home added to the capacity of the site, 2% is added to the affordable housing target. Sites with capacity for 5 additional homes (approx 500sqm GIA additional residential floorspace) should normally provide 10% affordable housing floorspace, sites with capacity for 10 additional homes (approx 1,000sqm GIA additional residential floorspace) should normally provide 20% affordable housing floorspace, and sites with capacity for 20 additional homes (approx 2,000sqm GIA additional residential floorspace) should normally provide 40% affordable housing floorspace. Sites with capacity for 25 additional homes or more should normally provide 50% affordable housing floorspace. Fig. IH1 below indicates how the sliding scale for percentage affordable housing targets will operate in more detail.

Fig. IH1. Sliding scale for affordable housing percentage targets

<b>Floorspace range (5 home intervals in capacity)</b> 1 or more additional homes with an additional residential floorspace of...	<b>Capacity</b> (rounded floorspace addition ÷ 100 sq m)	<b>Affordable housing percentage target</b> (capacity x 2%)
...100 to 150 sq m GIA	1 additional home	2%
...more than 450 sq GIA but not more than 550 sq m GIA	5 additional homes	10%
...more than 950 sq m GIA but not more than 1,050 sq m GIA	10 additional homes	20%
...more than 1,450 sq m GIA but not more than 1,550 sq m GIA	15 additional homes	30%
...more than 1,950 sq m GIA but not more than 2,050 sq m GIA	20 additional homes	40%
...more than 2,450 sq m GIA	25 additional homes or more	50%

#### Affordable housing floorspace target

- IH2.44 We will calculate a target for affordable housing and the proportion of housing in each type of housing (market/ social-affordable rented/ intermediate) in terms of additional residential floorspace.
- IH2.45 Calculating a target on the basis of the additional floorspace enables us to:
- negotiate family-sized affordable housing in schemes where the developer proposes smaller market homes; and
  - prevents an under-provision of affordable housing where the developer proposes unusually large market homes.
- IH2.46 Calculations will *not* 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.
- IH2.47 The affordable housing floorspace target will be determined by applying the affordable housing percentage target to *all* additional housing floorspace proposed. The percentage target is *not* applied to the rounded floorspace, which is only used to assess the *capacity* for additional homes, and the *percentage* affordable housing target.
- IH2.48 The affordable housing percentage target will not be applied to any existing residential floorspace which is being retained or replaced as part of the development. However:

- the affordable housing percentage target will be applied to additional residential floorspace created by converting or redeveloping existing *non-residential* floorspace; and
  - any existing affordable housing floorspace on the development site should be retained or replaced independently of the affordable housing target in accordance with Local Plan Policy H5.
- IH2.49 The affordable housing percentage target will generally be applied to the additional Gross Internal Area (GIA) to provide the affordable housing floorspace target as a GIA. This approach ensures consistency at each stage in the calculation and ensures that different components of the scheme are assessed on a comparable basis.
- IH2.50 As indicated in paragraph IH2.24 of this guidance, we will accept a payment in lieu of affordable housing where developments have capacity for fewer than 10 additional dwellings (based on paragraph IH2.41 and Fig. IH1, this will generally be developments involving additional residential floorspace of 950 sq m GIA or less), and exceptionally in other circumstances. Our formula for payments in lieu of affordable housing is provided in Camden Planning Guidance CPG8: Planning Obligations, and is based on Gross External Area (GEA)<sup>2</sup>. Where we consider that a payment in lieu of affordable housing is appropriate, we will apply the affordable housing percentage target to the Gross External Area (GEA) to provide the affordable housing floorspace target as a GEA. We will therefore expect developers to provide measurements of the Gross External Area of additional residential floorspace, particularly where developments provide one or more additional homes and involve 100 to 950 sq m GIA additional floorspace.
- IH2.51 Where developments have capacity for 10 or more additional homes (based on paragraph IH2.41 and Fig. IH1, this will generally be developments involving more than 950 sq m GIA additional residential floorspace), the affordable housing should be provided on site. Fig. IH2 below gives examples of how we will calculate the on-site affordable housing floorspace target.
- IH2.52 In negotiations for on-site affordable housing, we will focus on seeking affordable homes of an appropriate size and layout rather than absolute mathematical correspondence with the affordable housing floorspace target.

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<sup>2</sup> guidance on the application of the CPG8 formulae is given in paragraphs IH2.28 to IH2.29 and IH2.95 to IH2.125 of this guidance

Fig. IH2. Calculating the on-site affordable housing floorspace target

Example	Capacity (rounded floorspace addition/ 100 sq m)	Affordable housing %ge target (capacity x 2%)	On-site affordable housing floorspace target (%ge target x floorspace addition)
10 additional homes with an additional residential floorspace of 1,245 sq m GIA	1,200/ 100 = 12 additional homes	12 x 2% = 24%	24% x 1,245 sq m = 298.8 sq m GIA
16 additional homes with an additional residential floorspace of 1,775 sq m GIA	1,800/ 100 = 18 additional homes	18 x 2% = 36%	36% x 1,775 sq m = 639 sq m GIA
21 additional homes with an additional residential floorspace of 1,775 sq m GIA	1,800/ 100 = 18 additional homes	18 x 2% = 36%	36% x 1,775 sq m = 639 sq m GIA
21 additional homes with an additional residential floorspace of 2,360 sq m GIA	2,400/ 100 = 24 additional homes	24 x 2% = 48%	48% x 2,360 sq m = 1,132.8 sq m GIA
25 additional homes with an additional residential floorspace of 2,425 sq m GIA	2,400/ 100 = 24 additional homes	24 x 2% = 48%	48% x 2,425 sq m = 1,164 sq m GIA
25 additional homes with an additional residential floorspace of 2,749 sq m GIA	2,700/ 100 = 27 additional homes (ie "25 homes or more")	25 x 2% = 50%	50% x 2,749 sq m = 1,374.5 sq m GIA

IH2.53 Policy H4 of the Camden Local Plan 2017 indicates that the Council will take into account many other characteristics of the development, the site and the area when considering whether affordable housing should be sought, whether provision should be made on site, and the scale and nature of the provision that would be appropriate. Where we agree that the affordable housing can be provided off-site, the amount of affordable housing sought will be adjusted. These adjustments are explained in the sub-section of Housing CPG 2016 '**Can the market housing and affordable housing be provided off-site?**'.

IH2.54 The Camden Local Plan Review Financial Viability Study 2015 examined the viability of the sliding scale and the 50% floorspace target for sites with capacity for 25 homes or more. The Study indicates that



the scale and target is financially viable for a range of scheme types across a range of locations in the borough. However, there will be circumstances where the percentage of affordable housing sought by the sliding scale or target is not viable. The sub-section of Housing CPG 2016 '**How will the Council consider financial viability**' explains what we will expect from the developer in these circumstances.

### **How much housing and affordable housing do we expect as part of a mix of uses?**

*This is a new section included in the Interim Housing CPG.*

- IH2.55 Camden Local Plan Policy H2 indicates that we will require 50% of additional floorspace to be self-contained housing in developments involving more than 200 sq m (GIA) additional floorspace in the Central London Area and the larger town centres<sup>3</sup>. Policy H2 contains five criteria that the Council will take into account in determining whether the self-contained housing requirement applies to a specific scheme. In addition, Local Plan Policy H4 gives targets and criteria which we use to assess the appropriate contribution to affordable housing from each development.
- IH2.56 Where the Policy H2 requirement for self-contained housing applies, the self-contained housing percentage target is 50% in all cases, and the housing is required on site as part of a mix of uses. The self-contained housing floorspace target will generally be applied to the total addition to floorspace, and will be assessed on the basis of GIA. However, certain aspects of the development need to be considered in determining how the 50% target is applied to calculate the self-contained housing floorspace target:
- the 50% target does not apply to existing floorspace which is being retained or replaced;
  - any existing residential floorspace on the development site should be retained or replaced independently of the 50% target in accordance with Local Plan Policy H3;
  - the 50% target does not apply to additional floorspace for student housing or other non self-contained housing for long-term residents;
  - any additional floorspace for student housing or other non self-contained housing for long-term residents should be deducted from the total addition to floorspace before the 50% target is applied;
  - the 50% target *does* apply to additional floorspace for visitor accommodation (including hotels, serviced apartments and hostels aimed at tourists and backpackers), and such floorspace should be included as part of the total addition to floorspace when the 50% target is applied; and

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<sup>3</sup> Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road

- any additional floorspace proposed for self-contained housing should be included as part of the total addition to floorspace when the 50% target is applied, but it will also contribute to meeting the housing floorspace requirement.

- IH2.57 Policy H2 indicates that the Council will take into account all ten of the policy's criteria in considering the most appropriate mix of housing and other uses. Supporting paragraphs to Policy H2 confirm that where self-contained housing is required, the appropriate mix of housing will include affordable housing, subject to the provisions of Policy H4.
- IH2.58 Considering Policies H2 and H4 together, where the requirement for self-contained housing applies, it will be necessary to calculate the affordable housing percentage target and the market housing percentage target. The affordable housing percentage target should be calculated starting with the self-contained housing floorspace target arising from Policy H2, and assessing the capacity for this floorspace for additional homes in accordance with paragraphs IH2.39 to IH2.42 of this guidance. The market housing percentage target will be the remainder of the self-contained housing required after the affordable housing percentage target has been deducted (ie 100% minus the affordable housing percentage target).
- IH2.59 Once the affordable housing percentage target and the market housing percentage target have been calculated, they should be applied to the self-contained housing floorspace target to produce a market housing floorspace target and an affordable housing floorspace target, following the methodology set out in paragraphs IH2.44 to IH2.48 of this guidance. Fig. IH3 sets out four examples of the calculation of market and affordable housing floorspace targets for progressively larger schemes.
- IH2.60 Different thresholds in Policies H2 and H4 indicate whether on-site provision is expected or whether off-site provision (or a payment in lieu) may be accepted, as follows:
- Policy H2 requires self-contained housing to be provided on site (particularly where 1,000sq m (GIA) of additional floorspace or more is proposed); and
  - Policy H4 expects affordable housing to be provided on site (for developments with capacity for 10 or more additional dwellings).
- IH2.61 Each policy also has a set of criteria that the Council will use to consider whether on-site provision is practical or off-site provision would be more appropriate. Where we agree that off-site provision is appropriate, the targets for self-contained housing and affordable housing will be adjusted. These adjustments are explained in the sub-section of Housing CPG 2016 '**Can the market housing and affordable housing be provided off-site?**'.
- IH2.62 The targets given in Fig. IH3 are all calculated on the basis that self-contained housing and affordable housing will be provided on site as part of the development. However, the examples have been selected to

illustrate the impact of thresholds in Policies H2 and H4 triggering on-site requirement.

- Example 1 shows calculation of the targets where the total addition to floorspace is below 1,000 sq m GIA, and illustrates that in this scenario there is potential for a payment in lieu of affordable housing and off-site provision or a payment-in-lieu of market housing.
- Example 2 shows calculation of the targets where the total addition to floorspace is between 1,000 sq m and 2,000 sq m GIA, and illustrates that in this scenario we will accept a payment in lieu of affordable housing but expect market housing to be provided on site.
- Example 3 shows a total addition to floorspace above 2,000 sq m GIA, and in this scenario we will expect affordable and market housing to be provided on site.
- Example 4 shows that where the total addition to floorspace is 5,000 sq m GIA or more, the self-contained housing floorspace target is 2,500 sq m GIA or more, the affordable housing percentage target is 50%, and the housing floorspace should be divided equally between affordable housing and market housing.

**Fig. IH3. Calculating the market housing and affordable housing targets as part of a mix of uses**

**Example 1 – total addition to floorspace under 1,000 sq m GIA**

Total addition to floorspace proposed	660 sq m GIA
Self-contained housing floorspace target	$660 \times 50\% = 330$ sq m GIA
Capacity	$300 / 100 = 3$ additional homes
Affordable housing percentage target	$3 \times 2\% = 6\%$
Affordable housing floorspace target	$330 \times 6\% = 19.8$ sq m GIA
Is off-site provision or a payment in lieu of affordable housing acceptable?	yes, Policy H4 indicates that where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing
Market housing percentage target	$100 - 6\% = 94\%$
Market housing floorspace target	$330 \times 94\% = 310.2$ sq m GIA
Is off-site provision or a payment in lieu of market housing acceptable?	may be considered where on-site options have been thoroughly explored, subject to Policy H2 criteria

**Example 2 – total addition to floorspace 1,000 sq m GIA or more (but below 2,000 sq m GIA)**

Total addition to floorspace proposed	1,450 sq m GIA
Self-contained housing floorspace target	$1,450 \times 50\% = 725$ sq m GIA
Capacity	$700 / 100 = 7$ additional homes
Affordable housing percentage target	$7 \times 2\% = 14\%$
Affordable housing floorspace target	$725 \times 14\% = 101.5$ sq m GIA
Is off-site provision or a payment in lieu of affordable housing acceptable?	yes, Policy H4 indicates that where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing
Market housing percentage target	$100 - 14\% = 86\%$
Market housing floorspace target	$725 \times 86\% = 623.5$ sq m GIA
Is off-site provision or a payment in lieu of market housing acceptable?	not normally – Policy H2 indicates that we will require self-contained housing to be provided on site, particularly where 1,000sq m (GIA) of additional floorspace or more is proposed

**Example 3 - total addition to floorspace 2,000 sq m GIA or more (but below 5,000 sq m GIA)**

Total addition to floorspace proposed	2,730 sq m GIA
Self-contained housing floorspace target	$2,730 \times 50\% = 1,365$ sq m GIA
Capacity	$1,400 / 100 = 14$ additional homes
Affordable housing percentage target	$14 \times 2\% = 28\%$
Affordable housing floorspace target	$1,365 \times 28\% = 382.2$ sq m GIA
Is off-site provision or a payment in lieu of affordable housing acceptable?	not normally – Policy H4 indicates that for developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site
Market housing percentage target	$100\% - 28\% = 72\%$
Market housing floorspace target	$1,365 \times 72\% = 982.8$ sq m GIA
Is off-site provision or a payment in lieu of market housing acceptable?	not normally (as stated in Example 2)

**Example 4 - total addition to floorspace 5,000 sq m GIA or more**

Total addition to floorspace proposed	5,180 sq m GIA
Self-contained housing floorspace target	$5,180 \times 50\% = 2,590$ sq m GIA
Capacity	$2,600 / 100 = 26$ additional homes (ie "25 homes or more")
Affordable housing percentage target	$25 \times 2\% = 50\%$
Affordable housing floorspace target	$50\% \times 2,590 = 1,295$ sq m GIA
Is off-site provision or a payment in lieu of affordable housing acceptable?	not normally (as stated in Example 3)
Market housing percentage target	$100\% - 50\% = 50\%$
Market housing floorspace target	$50\% \times 2,590 = 1,295$ sq m GIA
Is off-site provision or a payment in lieu of market housing acceptable?	not normally (as stated in Examples 2 and 3)

- IH2.63 The different thresholds and criteria in Policies H2 and H4 relating to on-site and off-site provision create potential for developers to meet policy requirements in a variety of different ways. In some circumstances, the requirements of both policies might be met off-site or through a payment-in-lieu (a possible outcome of Example 1). In some circumstances, market housing might be provided on-site as part of the development whilst a payment-in-lieu is made in place of affordable housing (a possible outcome in the cases of Examples 1 and 2).
- IH2.64 Where Policies H2 and H4 apply, schemes with a *total* addition to floorspace of under 2,000 sq m GIA and capacity for fewer than 10 additional homes (this will generally be developments involving 950 sq m GIA additional *residential* floorspace) may meet the affordable housing target by making a payment-in-lieu. Where a payment-in-lieu is accepted in place of affordable housing, but market housing is provided on site as part of the development, we will expect increased provision of market housing to meet the full self-contained housing target. The Council may negotiate an adjusted affordable housing payment-in-lieu to reflect the increased provision of market housing.
- IH2.65 As indicated in paragraph IH2.38 of this guidance, Camden has an estimated requirement for 10,000 affordable homes for the 15-year Plan period, compared with a Local Plan target of 5,300 additional affordable homes based on likely delivery. To assist in bridging the gap between the requirements and the likely delivery, the Council will adopt a different approach to schemes where Policies H2 and H4 apply, the total addition to floorspace is 2,000 sq m or more, and affordable housing is required on site. For schemes where it is not possible to meet the full requirement for self-contained housing on site as part of a mixed use development, we will prioritise the delivery of affordable housing.
- IH2.66 Taking this priority for affordable housing into account, in some circumstances affordable housing might be provided on site as part of

the development whilst market housing is offered in the form of an off-site contribution or payment-in-lieu – this is a possible outcome of Examples 3 and 4 in situations where on-site delivery of the full requirement for additional self-contained housing is not practical. Where only affordable housing will be provided on-site, the Council may negotiate enhanced provision of affordable housing (in terms of quantity, quality and/ or affordability) by reinvesting a proportion of the payment in lieu of market housing within the development.

- IH2.67 The examples provided in Fig. IH3 and the variety of ways in which Policy H2 and Policy H4 requirements may be met are considered further in the sub-section of this guidance '**Payments in lieu**'.
- IH2.68 As indicated in paragraph IH2.28 of this guidance, the Camden Local Plan 2017 has adopted Gross Internal Area (GIA) to assess floorspace, but Camden Planning Guidance CPG8 provides formulae for payments in lieu of housing and affordable housing based on Gross External Area (GEA). Where we consider that a payment in lieu of self-contained housing and/ or affordable housing is appropriate, we will apply the percentage targets to the Gross External Area (GEA) to provide the floorspace targets as GEAs. We will therefore expect developers to provide measurements of the Gross External Area of additional floorspace (residential and non-residential, including individual tenures/ uses), particularly where the total addition to floorspace is less than 2,000 sq m (GIA).
- IH2.69 The Camden Local Plan Review Financial Viability Study 2015 examined the viability of the 50% target in Policy H2. The Study indicates that the target is financially viable for a range of scheme types across a range of locations in the Central London Area and the larger town centres. However, there will be circumstances where providing 50% of the additional floorspace as self-contained housing is not viable. The sub-section of Housing CPG 2016 '**How will the Council consider financial viability?**' explains what we will expect from the developer in these circumstances.

### **What types of affordable housing do we expect?**

*This sub-section replaces paragraphs 2.42 to 2.64 of the Housing CPG 2016.*

### **Mixing affordable housing and market housing**

- IH2.70 The Council expects affordable housing and market housing to form integral parts of each development. A common design approach should be used, with high quality materials and finishes throughout. Where a development site is large enough to accommodate several residential blocks, market and affordable blocks should be spread evenly across the site. The layout of the development should optimise residential amenity for all tenures, and avoid concentrating affordable housing close to potential sources of disturbance such as service yards, traffic and railways. The Council strongly urges developers to involve a provider

from the Council's Approved Strategic Partner List at an early stage in scheme design to ensure an appropriate layout, mix and design for the affordable housing – see the sub-section of this guidance '**How should the affordable housing be provided?**' for more information.

- IH2.71 In schemes with internal communal spaces, the Council does not generally seek to mix affordable and market dwellings on the same corridors or sharing the same stairs, lifts and entrance lobbies. This is because occupiers have to pay a service charge and/ or management charge for the cleaning and maintenance of communal spaces. Service charges are often a significant proportion of overall housing costs, particularly in market housing blocks, and can simply be too high for the occupiers of affordable housing to pay. The law ensures that an occupier cannot be required to pay higher service charges to subsidise charges to another occupier receiving the same common services, regardless of tenure. To ensure that service charges are kept to a minimum, the communal parts of affordable housing are generally designed for durability and low maintenance costs.

#### **SERVICE CHARGES**

Service charges are levied by landlords to recover the costs they incur in providing services to a dwelling. The charge normally covers the cost of such matters as general maintenance and repairs, insurance of the building and, where the services are provided, central heating, lifts, lighting and cleaning of common areas etc.

- IH2.72 Where it is necessary for affordable and market housing to share the same entrances, stairs and lifts, the Council will seek to ensure that they are designed to keep service charges sufficiently low for the affordable housing to be available to eligible households. Paragraph 3.113 of the Camden Local Plan 2017 notes that the Council will take account of the affordability of the anticipated service charges for on-site affordable housing when considering whether off-site provision is appropriate. However, the Council will only accept off-site affordable housing in response to high service charges where measures to keep service and management charges within affordable limits have been fully explored and found to be impractical. For more information - see the sub-section of the Housing CPG 2016 '**Can the market housing and affordable housing be provided off-site?**'.

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

- IH2.73 The Camden Local Plan 2017 indicates that we are aiming to minimise social polarisation and create mixed, inclusive and sustainable 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-affordable rented housing, however we recognise that intermediate housing can make an important contribution to creating mixed communities. Local Plan Policy H4 sets out guidelines that 60% of affordable housing should be social-affordable rented housing and 40% should be intermediate housing. For consistency with our approach to calculating and applying affordable

housing targets in Policy H4, we will generally calculate the split between social-affordable rented and intermediate housing in terms of floorspace, measured on the basis of Gross Internal Area (GIA).

IH2.74 Local Plan Policy H4 indicates 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-affordable rented housing and intermediate housing are set out in paragraph 3.105 of the Local Plan. Circumstances where the Council may depart from the 60% social-affordable rented: 40% intermediate split include:

- providing flexibility for up to 100% social-affordable rented housing or 100% intermediate housing where the overall proportion of affordable housing in the scheme is over 65%; and
- seeking up to 100% social-affordable rented housing where the overall proportion of affordable housing in the scheme is 30% or less.

#### **Types of social-affordable rented housing we expect**

IH2.75 The Council seeks to deliver new social-affordable rent housing in Camden at or about the level of target rents for social housing. The Council therefore supports the Mayor of London's new product, London Affordable Rent, which is a form of social-affordable rented housing that is subject to benchmark rents similar to the target rents for social housing in Camden. The benchmarks for London Affordable Rent are set out in the Funding Guidance for the Mayor's Affordable Homes Programme 2016-2021 (November 2016).

IH2.76 More information about social-affordable rented housing is provided in paragraphs IH2.12 to IH2.14 of this guidance. Between 2011 and 2016, Government funding was focused on the product *affordable rented housing* rather than supporting social rented housing at target rents. Rents for *affordable rented housing* are set at up to 80% of local market rent (including any service charges), and consequently are not considered to be genuinely affordable in London. The Mayor has devised London Affordable Rent as a replacement product for the capital. The Mayor's Affordable Housing and Viability SPG (August 2017) indicates that London Affordable Rent should be the default rent level for new social-affordable rent homes in London, and the Council supports this position.

#### **Types of intermediate housing we expect**

IH2.77 The Camden Local Plan 2017 indicates in paragraph 3.104 that the Council will generally seek intermediate rented housing rather than other forms such as shared-ownership housing. The Council adopted an Intermediate Housing Strategy on 6 April 2016, which we will take into account when considering proposals involving intermediate housing. The Intermediate Housing Strategy is available at: <http://www.camden.gov.uk/ccm/navigation/housing/housing-options/http->



-[www.camden.gov.uk/ccm/content/housing-housing-options-new-i-want-to-buy-or-rent-in-camden-intermediate-housingen/](http://www.camden.gov.uk/ccm/content/housing-housing-options-new-i-want-to-buy-or-rent-in-camden-intermediate-housingen/)

- IH2.78 The Intermediate Housing Strategy states that we will seek to ensure that the majority of intermediate housing in each scheme is affordable to households with gross incomes between £30,000 and £40,000 (as adjusted by wage inflation). A small proportion of the homes could be provided at rents affordable to households with higher incomes, but incomes should not exceed the maximum of £60,000 adopted in the Mayor's Affordable Housing and Viability SPG (August 2017). When the affordability of intermediate housing is assessed, service charges are included as part of the overall cost, and we will encourage developers to take this into account at the design stage so that service charges are minimised.
- IH2.79 The Council considers housing to be affordable where housing costs (including rent and service charges) take up no more than 40% of net household income (with net income assumed to be 70% of gross income). For example, the maximum cost affordable to a household with a gross income of £30,000 would be £162 per week, the maximum cost with a gross income of £40,000 would be £215 per week, and the maximum cost with a gross income of £60,000 would be £323 per week.
- IH2.80 Shared-ownership housing refers to housing where occupiers buy a share (generally 25% to 75% of the value of the home) and pay rent on the remainder. Due to the high market values in Camden and lenders' deposit requirements, it is now rarely possible to develop homes for shared ownership in Camden that would be affordable to eligible households. The Mayor's Affordable Housing and Viability SPG (August 2017) confirms that generally shared ownership is not appropriate where unrestricted market values of a home exceed £600,000. Given these constraints, in most circumstances the Council will not support proposals for shared-ownership housing in Camden.
- IH2.81 The Mayor has introduced a new intermediate housing product known as London Living Rent. This product is initially offered for rent, but by the end of the initial ten years it will convert to shared ownership. The Council welcomes the Mayor's increased emphasis on intermediate rented housing, but is not promoting conversion to shared ownership in Camden due to the high market values in the borough. We also welcome that the Mayor's recognition that providers have the flexibility to let intermediate rented housing at rents lower than the ward caps for London Living Rent. In Camden, the Council will seek to agree rents appropriate to the target income groups and housing costs set out in paragraphs IH2.78 and IH2.79 of this guidance.
- IH2.82 The Council has set local priorities for offers of tenancies in intermediate rented housing. These are set out in Schedule 1 of the Intermediate Housing Strategy. The Council has also established a Register of Interest for people interested in securing intermediate housing in Camden. Providers are expected to market their properties to people on the Register of Interest before marketing them more widely. Information

about the Strategy and the Register of Interest is available at:  
<http://www.camden.gov.uk/ccm/navigation/housing/housing-options/http-wwwcamdengovuk-ccm-content-housing-housing-options-new-i-want-to-buy-or-rent-in-camden-intermediate-housingen/>

- IH2.83 When intermediate housing was first introduced it was often aimed specifically at key workers. Key workers are generally defined as staff of public authorities such as the NHS, teachers, social workers, fire-fighters, the police and the armed forces. The Council will not generally limit occupation of intermediate housing to key workers. Where a restriction to key workers is appropriate in the context of the characteristics of the development or the area, Camden will generally use the definition of key workers given in this guidance, varied as necessary to meet the purpose of the proposal (eg for development on NHS land to provide housing for nurses). When considering the proportion of key worker housing appropriate to a development, the Council will have regard Local Plan Policy H4, the characteristics of the development and the area and the circumstances noted in paragraph IH2.74 of this guidance.

### **Mix of dwelling sizes**

- IH2.84 The Council's Residential development standards (included in this CPG) give general guidance on minimum floorspace, internal arrangements and accessibility for all housing tenures. In particular, homes of all tenures should satisfy the requirements of Policy H6 of Camden Local Plan 2017 in relation to the nationally described space standard, accessible and adaptable dwellings, and wheelchair user dwellings.
- IH2.85 This sub-section of the guidance is concerned primarily with the numbers of bedrooms that are expected as part of affordable housing development. Local Plan paragraph 3.185 defines 'large homes' as homes with 3-bedrooms or more, and 'small homes' as studio flats, 1-bedroom and 2-bedroom homes. Local Plan Policy H7 indicates that we will expect a mix of large and small homes in all housing development, and seek a range of self-contained homes to meet identified dwelling size priorities. These priorities are set out in detail in paragraph 3.189 of our Local Plan, which includes a Dwelling Size Priorities Table.
- IH2.86 For social-affordable rented housing, we will give high priority to family homes with three bedrooms, and to smaller homes with two bedrooms.
- IH2.87 For intermediate rented housing, we will give high priority to studio and one bedroom homes. We will also consider inclusion of high quality two bedroom/ four person homes for sharers where these can improve the affordability of the intermediate rented homes in a scheme to the Council's target income groups (the target income groups and housing costs are set out in paragraphs IH2.78 and IH2.79 of this guidance – for example two sharers each with a gross income of £30,000 could potentially afford housing costs of £323 per week). Any two bedroom/ four person homes should be genuinely suitable for sharers and dedicated to letting on a shared basis to two eligible households. We will

not generally support provision of intermediate rented homes with three bedrooms or more as these would not be affordable to our target income groups on an individual basis and would be more complex to let on a shared basis. More detailed guidance is given in the following Fig. IH4 and Fig. IH5.

**Fig. IH4. Mix of social-affordable rented housing**

<p><b>Overall aim: 50% of homes with 3 bedrooms or more</b></p> <p><b>Preferred mix:</b></p> <ul style="list-style-type: none"> <li>• 1-bedroom homes – no more than 20%</li> <li>• 2-bedroom homes – 30%</li> <li>• 3-bedroom homes – 30%, or 50% if no 4-bedroom homes are provided</li> <li>• 4-bedroom homes – 20%</li> </ul> <p><b>Other objectives:</b></p> <ul style="list-style-type: none"> <li>• Social-affordable rented homes should be provided at the benchmark rents for London Affordable Rent, or otherwise at or around the level of target rents for social housing.</li> <li>• Social-affordable rented homes should have physically separate kitchens and living areas where practical, particularly 3- and 4-bedrooms homes.</li> <li>• 10% of social-affordable rented homes should be designed, built and fitted-out as Wheelchair Accessible Dwellings to comply with Building Regulation M4(3)(2)(b) in accordance with Local Plan Policy H6 and accompanying paragraph 3.155.</li> </ul>
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**Fig. IH5. Mix of intermediate rented housing**

<p><b>Preferred mix:</b></p> <ul style="list-style-type: none"> <li>• Studio flats/ 1-bedroom homes – a proportion is expected in all schemes</li> <li>• 2-bedroom homes– a limited proportion of high quality two bedroom/ four-person homes may be included where they are genuinely suitable for sharers and dedicated to letting on a shared basis to two eligible households</li> <li>• 3-bedrooms or more - generally we will not support provision of homes with three bedrooms or more.</li> </ul> <p><b>Other objectives:</b></p> <ul style="list-style-type: none"> <li>• Intermediate rented homes should be affordable to the target income groups set out in paragraph IH2.78 of this guidance.</li> <li>• 10% of intermediate homes should be designed and built as Wheelchair Adaptable Dwellings to comply with Building Regulation M4(3)(2)(a) in accordance with Local Plan Policy H6 and accompanying paragraph 3.155.</li> </ul>
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IH2.88 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 Local Plan Policy H7. We will take full account of guidance in the Local Plan dealing with large homes and child density (paragraphs 3.197 to 3.199), and wheelchair user dwellings (paragraphs 3.154 – 3.155).

- IH2.89 Where schemes involve both social-affordable rented housing and intermediate housing, it may often be appropriate to have a high proportion of one-bedroom intermediate homes and a high proportion of social-affordable rented homes with three bedrooms or more. Such schemes can potentially meet our dwelling size priorities while limiting the cost of the intermediate housing and limiting overall child density.

### **Transparency and confidential viability information**

*This sub-section replaces paragraphs 2.77 and 2.78 of the Housing CPG 2016.*

- IH2.90 The Camden Local Plan 2017 indicates that the Council supports transparency in decision making (see Local Plan paragraphs 3.64, 3.123 and 11.35). To that end we will:
- expect developers to provide information on viability through an open-book approach;
  - seek the maximum reasonable disclosure of information in viability appraisals; and
  - have regard to any elements that are commercially sensitive.
- IH2.91 When an applicant submits viability information to the Council (including viability appraisals and all supporting material), the applicant should be aware that the Council favours transparency and public disclosure. There is a presumption in favour of disclosure, both built into the Environmental Information Regulations 2004 and the Council's own approach. Therefore the Council's standard policy is that all viability information will be released, whether proactively by routine publication or reactively ie in response to Environmental Information Regulations or Freedom of Information Act requests.
- IH2.92 As noted there is a presumption in favour of disclosure therefore the Council will assess any case for confidentiality against that backdrop having regard to the adverse effect and the overriding public interest test in the Environmental Information Regulations and the Freedom of Information Act. Where, in the Council's opinion, the public interest falls on the side of releasing, the viability information will be published notwithstanding the applicant's case for any specific element of the viability information to remain confidential.
- IH2.93 As indicated in Local Plan paragraphs 3.64 and 3.123, the Council may seek independent verification of a viability appraisal where the proposed contribution to housing or affordable housing falls significantly short of requirements in Policies H2 and H4. The Council will also favour transparency and public disclosure in the verification process. As part of the decision-making process the Council will therefore generally release a report of the independent verification of the financial viability appraisal.
- IH2.94 Where a further viability appraisal is submitted to the Council after the determination of a planning application (for example, in association with

a deferred contingent contribution to housing or affordable housing), the Council will also favour transparency and public disclosure.

### **Deferred affordable housing contributions - replacement paragraph in the Housing CPG 2016**

*The following paragraph has been inserted in the Housing CPG 2016 to replace paragraph 2.100.*

The further financial viability appraisal should comply with all the requirements for financial viability appraisal set out in paragraphs 2.65 to 2.92 of the Housing CPG 2016, including the modelling of cash flows. Where inputs such as build costs and sales values are based on estimates rather than agreed contracts and transactions on homes within the scheme, we will expect appraisals to use appropriate projections with reference to trends in the requisite segment of the housing market and to sources such as BCIS indices. The Council will favour transparency and public disclosure of the further financial appraisal in accordance with the subsection of our Interim Housing CPG '**Transparency and confidential viability information**'.

### **Payments in lieu**

*This sub-section replaces paragraphs 2.121 to 2.124 of the Housing CPG 2016.*

- IH2.95 Local Plan Policy H2 indicates that any requirement for self-contained housing should generally be met on site (particularly where additional floorspace of 1,000sq m (GIA) or more is proposed). Policy H4 indicates that any requirement for affordable housing should be met on site for developments with capacity for 10 additional dwellings or more. For smaller schemes, there is potential for the Council to accept payments in lieu of both affordable and market housing. Otherwise, Policies H2 and H4 only allow payments-in-lieu of housing/ affordable housing in exceptional circumstances. Paragraphs 2.101 to 2.105 of the Housing CPG 2016 provide more information about those circumstances. Payments-in-lieu may be accepted where the required housing/ affordable housing cannot practically be achieved on-site and the applicant demonstrates that no alternative site is available in the area (see paragraphs 3.57 and 3.117 of the Camden Local Plan 2017). Payments-in-lieu of housing will be paid into the Council's affordable housing fund whether they arise under Policy H2 or Policy H4, as the Council does not hold funds for investment in market housing.
- IH2.96 Where development proposals involve a shortfall of the housing or affordable housing required under Policies H2 or H4, the Council may negotiate a payment in lieu of the unmet requirement.
- IH2.97 Where the Council considers that a payment-in-lieu of housing/ affordable housing is appropriate under Policies H2 or H4, we will calculate the payment-in-lieu on the basis of the figures in Camden Planning Guidance CPG8 on **Planning Obligations**. The calculation is based on viability research commissioned by the Council in 2010 to set

standard payment-in-lieu figures per square metre for market and affordable housing.

### **Payment-in-lieu figures per sq m**

- IH2.98 Following adoption of the Camden Local Plan 2017, we expect to commission new research to generate new standard payment-in-lieu figures based on current development values and costs. We anticipate that consultation on the new figures will take place as part of review of CPG2 and CPG8 in 2018. In the interim, the Council will continue to use the existing figures in CPG8 based on 2010 research.
- IH2.99 In the context of the policy approach set out in the Local Plan, the two payment in lieu figures from CPG8 that will be appropriate in most cases are as follows:
- £700 per sq m GEA – this figure will be applied where there is a shortfall of market housing under Policy H2 in a non-residential or mixed use development<sup>4</sup>;
  - £2,650 per sq m GEA – this figure will be applied where there is a shortfall of affordable housing under Policies H2 and H4 in a residential, non-residential or mixed-use development<sup>5</sup>.
- IH2.100 CPG8 also provides a third figure of £1,350 per sq m GEA. This figure is only appropriate in the case of a large non-residential or mixed-use development where the 50% affordable housing percentage target applies (ie having capacity for 25 or more additional homes) and there is an equal shortfall of market housing and affordable housing under Policies H2 and H4<sup>6</sup>. Non-residential/ mixed-use developments where

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<sup>4</sup> this figure is based on the difference between the residual value of commercial space in a development and the residual value of market housing in a development, and represents the benefit to the developer of providing commercial floorspace in place of market housing

<sup>5</sup> this figure is based on the difference between the residual value of market housing in a development and the residual value of affordable housing in a development, and represents the benefit to the developer of providing market housing in place of affordable housing – ideally for mixed use schemes the figure would increase to reflect the difference between the residual value of commercial space in a development and the residual value of affordable housing in a development (potentially the sum of £700 psm and £2,650 psm), however the 2010 research did consider this scenario

<sup>6</sup> this figure is based on the difference between the residual value of commercial space within a development of and the residual value of self-contained housing within a development, where the housing is split 50:50 between market and affordable housing – it is no longer appropriate for mixed-use development with capacity for fewer than

the 50% affordable housing percentage target applies will generally be those involving a *total* addition to floorspace of 5,000 sq m GIA or more.

IH2.101 These figures were devised on the basis that they should apply to the Gross External Area (GEA) of housing/ affordable housing required. As indicated in paragraph IH2.28 of this guidance, we will expect developers to provide measurements of the residential and non-residential GEA (and the individual tenures/ uses) where the Council considers that a payment in lieu of housing or affordable housing is appropriate. Where a measurement of GEA is not available, the Council will consider using a standard multiplier to estimate GEA as set out in paragraphs IH2.29 and IH2.30 of this guidance.

### **Calculating payments in lieu of affordable housing (residential developments)**

IH2.102 As indicated in Local Plan Policy H4, we will accept a payment in lieu of affordable housing where developments have capacity for fewer than 10 additional dwellings, but otherwise only in exceptional circumstances.

IH2.103 In order to calculate the payment, it is necessary to calculate the on-site affordable housing floorspace target<sup>7</sup> in accordance with paragraphs IH2.39 to IH2.49 of this guidance – in summary, we will assess:

- the capacity of the development (based on GIA rounded to the nearest 100 sq m, where each 100 sq m GIA added to residential floorspace represents capacity for one additional home);
- the affordable housing percentage target (based on capacity, starting at 2% where development provides one or more additional homes and involves a total addition to residential floorspace of 100 sq m GIA or more, and adding 2% for each home added to the capacity); and
- the affordable housing floorspace target<sup>7</sup> (determined by applying the affordable housing percentage target to *all* additional housing floorspace – rather than a rounded floorspace).

IH2.104 As indicated in paragraph IH2.28 of this guidance, the Camden Local Plan 2017 has adopted Gross Internal Area (GIA) to assess floorspace, but CPG8 provides formulae for payments-in-lieu based on Gross External Area (GEA). Consequently, where the Council considers that a payment in lieu of affordable housing is appropriate, we will assess the capacity of the development and the affordable housing percentage

IH1.2

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25 additional homes as the sliding scale target for affordable housing now applies to these schemes rather than the 50% target

<sup>7</sup> please note that the method for calculating off-site affordable housing requirements set out in Figure 9 of the Housing CPG 2016 is only appropriate where direct provision of affordable housing will be made on an alternative site in the same area, and is *not* used to calculate payments in lieu



target on the basis of Gross Internal Area (GIA), but will apply the affordable housing percentage target to the overall addition to Gross External Area (GEA) to calculate the affordable housing floorspace target as GEA.

- IH2.105 The affordable housing shortfall will be the affordable housing floorspace target<sup>7</sup> (GEA) minus the floorspace of any new affordable housing proposed as part of the development (GEA). The payment in lieu required will be the affordable housing shortfall (GEA) multiplied by £2,650 per sq m.
- IH2.106 Fig. IH6 below gives examples of how we will calculate payments in lieu of affordable housing. All examples given involve 1 or more additional homes and an additional residential floorspace of 100 sq m GIA or more, thus triggering an affordable housing requirement. As payments in lieu will most commonly arise for developments with capacity for fewer than 10 additional homes, all the examples provided are in this category. In each case we have assumed that no affordable housing is proposed on-site as part of the development – thus the affordable housing shortfall equates to the affordable housing target (GEA).
- IH2.107 Fig. IH6 illustrates that total payments in lieu of affordable housing arising from developments with capacity for 1 to 9 additional homes can be expected to vary from around £7,000 for the smallest developments to £570,000 for the largest developments.

Fig. IH6. Calculating payments in lieu of affordable housing

<b>Additional residential floorspace (GIA)</b>	<b>Capacity</b> (rounded floorspace addition/ 100 sq m)	<b>Afford-able housing %ge target</b> (capacity x 2%)	<b>Estimated GEA<sup>8</sup></b> (GIA x 1.25)	<b>Afford-able housing floor-space target</b> (%ge target x GEA)	<b>Payment in lieu required</b> (floorspace target x £2,650)
105 sq m GIA	1 additional home	2%	105 x 1.25 = 131.2	2% x 131.2 = 2.6	2.6 x £2,650 = £6,890
259 sq m GIA	3 additional homes	6%	259 x 1.25 = 323.7	6% x 323.7 = 19.4	19.4 x £2,650 = £51,410
578 sq m GIA	6 additional homes	12%	578 x 1.25 = 722.5	12% x 722.5 = 86.7	86.7 x £2,650 = £229,755
941 sq m GIA	9 additional homes	18%	941 x 1.25 = 1,176.2	18% x 941 x = 211.7	211.7 x £2,650 = £561,005

### Calculating payments in lieu of market housing and affordable housing (non-residential and mixed-use developments)

IH2.108 As indicated in Local Plan Policy H2, we require self-contained housing to be provided on site as part of mixed-use developments, particularly where 1,000 sq m (GIA) of additional floorspace or more is proposed, but payment in lieu of self-contained housing may be appropriate in exceptional circumstances. The different thresholds and criteria in Policies H2 and H4 relating to on-site and off-site provision create potential for developers to meet policy requirements in a variety of different ways. The sub-section of this guidance **'How much housing and affordable housing do we expect as part of a mix of uses?'** provides more information about how the requirements may be met.

IH2.109 Where Policy H2 applies and the Council has agreed to accept a payment-in-lieu of all or part of the self-contained housing requirement, as it first step it is necessary to calculate the self-contained housing floorspace target (GIA), the capacity for additional homes, the affordable housing percentage target, and the market housing percentage target.

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<sup>8</sup> in these examples, we have estimated GEA as 1.25 x GIA, in accordance with paragraph IH2.30 of this guidance, but the Council will use the measured GEA where available, and will consider use of an alternative multiplier that is shown to be more appropriate

Guidance on calculating these is provided in paragraphs IH2.56, paragraphs IH2.39 to IH2.43, and paragraph IH2.58 respectively.

IH2.110 In most circumstances, we will expect some on-site provision of self-contained housing. In these cases, as a second step it is necessary to calculate the affordable housing floorspace target (GIA) and the market housing floorspace target (GIA) in accordance with the paragraphs IH2.44 to IH2.52 and paragraph IH2.59 of this guidance<sup>9</sup>. The third step will be to subtract any proposed additions to market and affordable housing floorspace included on the site from the relevant target to calculate the market housing shortfall (GIA) and the affordable housing shortfall (GIA).

IH2.111 As indicated in paragraph IH2.28 of this guidance, the Camden Local Plan 2017 has adopted Gross Internal Area (GIA) to assess floorspace, but CPG8 provides formulae for payments-in-lieu based on Gross External Area (GEA). Consequently, when calculating the payment for mixed-use schemes, the fourth step will be to convert each shortfall (GIA) into an estimated GEA, and the fifth and final step will be to calculate payments as follows:

- the payment in lieu of market housing will be the market housing shortfall (GEA) multiplied by £700 per sq m; and
- the payment in lieu of affordable housing will be the affordable housing shortfall (GEA) multiplied by £2,650 per sq m.

IH2.112 In exceptional circumstances, usually where the total addition to floorspace is under 1,000 sq m GIA, we may accept payment in lieu of all the self-contained housing requirement. In these cases:

- as a first step we will still use the Gross Internal Area (GIA) to assess the self-contained housing floorspace target (GIA), the capacity for additional homes, the affordable housing percentage target and the market housing percentage target;
- as a second step, we will apply the percentage targets to the overall addition to Gross External Area (GEA) to calculate the self-contained housing floorspace target (GEA), the affordable housing floorspace target (GEA) and the market housing floorspace target (GEA);
- the third step described in paragraph IH2.110 above will not be needed as the affordable housing floorspace shortfall will be the entire affordable housing floorspace *target*, and the market housing

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<sup>9</sup> please note that the methods for calculating off-site housing requirements and off-site affordable housing requirements set out Figure 8 and Figure 9 of the Housing CPG 2016 are only appropriate where direct provision of housing/ affordable housing will be made on an alternative site in the same area, and are not used to calculate payments in lieu

floorspace shortfall will be the entire market housing floorspace *target*;

- the fourth step described in paragraph IH2.111 above will not be needed as the floorspace targets are already expressed in terms of GEA;
- the payment in lieu of market housing will be the market housing target (GEA) multiplied by £700 per sq m; and
- the payment in lieu of affordable housing will be the affordable housing shortfall (GEA) multiplied by £2,650 per sq m.

IH2.113 In very rare circumstances, where justified taking into account all the criteria in Policy H2, we may accept payment in lieu of all the self-contained housing requirement for a scheme where the total addition to floorspace is 5,000 sq GIA or more, the self-contained housing floorspace target is 2,500 sq m GIA or more, and thus there is a 50% target each for affordable housing and market housing. In these rare circumstances the overall shortfall of self-contained housing is made up of equal shortfalls of affordable housing and market housing, and a single payment in lieu can be calculated more simply by taking the overall self-contained housing floorspace target (GEA) (which will also be the shortfall) and multiplying by £1,350 per sq m<sup>10</sup>.

IH2.114 Fig. IH7 to Fig. IH10 set out four examples of the calculation of payments in lieu for progressively larger schemes which illustrate the impact of thresholds in Policies H2 and H4 triggering on-site requirement. These examples adopt the same proposed addition to floorspace as adopted in Fig. IH3 'Calculating the market housing and affordable housing targets as part of a mix of uses', and thus also adopt the same targets for self-contained housing, market housing and affordable housing. For each example, for the initial scenario we have calculated the payment in lieu of affordable housing and the payment in lieu of market housing assuming that no provision is made on site and thus the target is the shortfall. For each example we have also considered one or more additional scenarios where a proportion of the self-contained housing requirement is met on site.

IH2.115 For most scenarios in Fig. IH7 to Fig. IH10, we have also assumed that the applicant has provided measurements of GIA and has been unable to provide measurements of GEA. For completeness, we have also

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<sup>10</sup> this calculation generates a lower sum than would be generated by separately calculating an affordable housing payment (from affordable housing floorspace shortfall x £2,650 per sq m) and a market housing payment (from market housing floorspace shortfall x £700 per sq m), however the £1,350 per sq m was generated from the 2010 research specifically for situations where a non-residential development generates a 50% self-contained housing target and a 50% affordable housing target, and we note that a payment in lieu could only be justified for such a large development in very rare circumstances

included scenarios in Fig. IH8, Fig. IH9 and Fig. IH10 (examples 2.2, 3.1, 4.1 and 4.3) showing the calculation where the applicant has provided measurements of GIA and GEA.

- IH2.116 Where Policies H2 and H4 apply, schemes involving a total addition to floorspace of under 2,000 sq m GIA and capacity for fewer than 10 additional homes may meet the affordable housing target by making a payment-in-lieu. Where market housing can be provided on site, we will expect increased provision of market housing to meet the full self-contained housing target. In these circumstances, the Council may negotiate an adjusted affordable housing payment-in-lieu to reflect the increased provision of market housing – this is illustrated by Examples 1.4 and 2.4.
- IH2.117 Where Policies H2 and H4 apply to schemes involving a total addition to floorspace of over 2,000 sq m GIA, and it is not possible to meet the full requirement for additional self-contained housing, we will prioritise the on-site delivery of affordable housing. Where only affordable housing will be provided on-site, the Council may negotiate enhanced provision of affordable housing (in terms of quantity, quality and/ or affordability) by reinvesting a proportion of the payment in lieu of market housing within the development – this is illustrated by Examples 3.3 and 4.4.
- IH2.118 In Fig. IH7, Examples 1.1 to 1.4 relate to four scenarios where the total addition to floorspace is below 1,000 sq m, so there is potential for a payment in lieu of affordable housing and market housing.
- Examples 1.1 and 1.2 are possible scenarios where the potential for on-site and off-site delivery of self-contained housing has been fully explored and there is no prospect of meeting the target in full.
  - Example 1.4 represents the Council's preferred scenario, as Policy H2 is fully satisfied by on-site provision of market housing, and Policy H4 is fully satisfied by a payment in lieu of affordable housing.
  - Example 1.3 satisfies Policy H4 through a payment in lieu of affordable housing, but does not satisfy Policy H2, as the additional self-contained housing floorspace falls short of 50% of the overall floorspace.
  - The payment in lieu calculations in Example 1.3 and 1.4 provide the same outcome, as there is no market housing shortfall in either case, and the affordable housing shortfall is the same in each case. To encourage developers adopt the scenario that fully satisfies Policy H2, the Council may negotiate an adjustment to the payment in lieu, equivalent to the surplus market housing floorspace, as shown in the penultimate row of the table for Example 1.4.

**Fig. IH7. Calculating payments in lieu of market housing and affordable housing where Policies H2 applies and the total addition to floorspace under 1,000 sq m GIA**

**Example 1.1 – scenario: development unable to provide any housing on or off site**

Total addition to floorspace proposed	660 sq m GIA
Self-contained housing floorspace target	660 x 50% target = 330 sq m GIA
Additional self-contained housing floorspace provision	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	300/100 x 2% = 6%
Affordable housing floorspace target (= shortfall in this scenario)	330 x 6% target = 19.8 sq m GIA
Estimated affordable housing shortfall GEA (GIA x 1.25)	19.8 x 1.25 = 24.7 sq m GEA
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	24.7 x £2,650 = £65,455
Market housing percentage target (100% minus affordable %ge target)	100 – 6% = 94%
Market housing floorspace target (=shortfall in this scenario)	330 x 94% = 310.2 sq m GIA
Estimated market housing shortfall GEA (GIA x 1.25)	310.2 x 1.25 = 387.7 sq m GEA
Payment in lieu of market housing (shortfall GEA x £700 psm)	387.7 x £700 = £271,390
<b>Total payment</b> (different affordable and market housing shortfalls)	£65,455 + £271,390 = <b>£336,845</b>

**Example 1.2 – scenario: development unable to meet full market housing requirement on-site**

Total addition to floorspace proposed	660 sq m GIA
Self-contained housing floorspace target	660 x 50% target = 330 sq m GIA
Additional self-contained housing floorspace provision - market	220 sq m GIA
Additional self-contained housing floorspace provision - affordable	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	300/100 x 2% = 6%
Affordable housing floorspace target (= shortfall in this scenario)	330 x 6% target = 19.8 sq m GIA
Estimated affordable housing shortfall GEA (GIA x 1.25)	19.8 x 1.25 = 24.7 sq m GEA
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	24.7 x £2,650 = £65,455
Market housing percentage target (100% minus affordable %ge target)	100 – 6% = 94%
Market housing floorspace target	330 x 94% = 310.2 sq m GIA
Market housing shortfall GIA	310.2 – 220 = 90.2 sq m GIA
Estimated market housing shortfall GEA (GIA x 1.25)	90.2 x 1.25 = 112.7 sq m GEA
Payment in lieu of market housing (shortfall GEA x £700 psm)	112.7 x £700 = £78,890
<b>Total payment</b> (different affordable and market housing shortfalls)	£65,455 + £78,890 = <b>£144,345</b>

**Example 1.3 – scenario: development meets full market housing requirement but unable to meet full self-contained housing requirement on-site**

Total addition to floorspace proposed	660 sq m GIA
Self-contained housing floorspace target	660 x 50% target = 330 sq m GIA
Additional self-contained housing floorspace provision - market	310 sq m GIA
Additional self-contained housing floorspace provision - affordable	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	300/100 x 2% = 6%
Affordable housing floorspace target (= shortfall in this scenario)	330 x 6% target = 19.8 sq m GIA
Estimated affordable housing shortfall GEA (GIA x 1.25)	19.8 x 1.25 = 24.7 sq m GEA
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	24.7 x £2,650 = £65,455
Market housing percentage target (100% minus affordable %age target)	100 – 6% = 94%
Market housing floorspace target	330 x 94% = 310.2 sq m GIA
Market housing shortfall GIA	310.2 – 310 = approx 0 sq m GIA
<b>Total payment</b> (affordable housing shortfall only)	<b>£65,455</b>

**Example 1.4 – scenario: full housing requirement met but no affordable housing**

Total addition to floorspace proposed	660 sq m GIA
Self-contained housing floorspace target	660 x 50% target = 330 sq m GIA
Additional self-contained housing floorspace provision - market	330 sq m GIA
Additional self-contained housing floorspace provision - affordable	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	300/100 x 2% = 6%
Affordable housing floorspace target (= shortfall in this scenario)	330 x 6% target = 19.8 sq m GIA
Estimated affordable housing shortfall GEA (GIA x 1.25)	19.8 x 1.25 = 24.7 sq m GEA
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	24.7 x £2,650 = £65,455



Market housing percentage target (100% minus affordable %ge target)	$100 - 6\% = 94\%$
Market housing floorspace target	$330 \times 94\% = 310.2 \text{ sq m GIA}$
Market housing SURPLUS GIA	$310.2 - 330 = -19.8 \text{ sq m GIA}$
Estimated market housing SURPLUS GEA (GIA x 1.25)	$-19.8 \times 1.25 = -24.7 \text{ sq m GEA}$
Potential adjustment for market housing surplus (surplus GEA x £700 psm)	$-24.7 \times £700 = -£17,290$
<b>Total payment</b> (affordable housing shortfall only)	<b>£65,455</b>

IH2.119 In Fig. IH8, Examples 2.1 to 2.4 relate to four scenarios where the total addition to floorspace is between 1,000 sq m and 2,000 sq m GIA, so we will accept a payment in lieu of affordable housing but expect market housing to be provided on site.

- Examples 2.1 and 2.2 show scenarios that would only be acceptable in exceptional circumstances because there is no on-site or off-site delivery of self-contained housing. In Example 2.2, the GEA has been provided by the applicant, and this illustrates how the steps in the calculation will vary where GEA is available.
- Example 2.4 represents the Council's preferred scenario, as Policy H2 is fully satisfied by on-site provision of market housing, and Policy H4 is fully satisfied by a payment in lieu of affordable housing.
- Example 2.3 shows a scenario that satisfies Policy H4 through a payment in lieu of affordable housing, but only partly satisfies Policy H2 through a combination of on-site provision of market housing and a payment in lieu of market housing.
- There is relatively little difference between the outcome of the payment in lieu calculations in Example 2.3 and 2.4. This is because the affordable housing shortfall is the same in each case and only Example 2.3 involves a market housing shortfall – which is very small. To encourage developers adopt the scenario that fully satisfies Policy H2, the Council may negotiate an adjustment to the payment in lieu, equivalent to the surplus market housing floorspace, as shown in the penultimate row of the table for Example 2.4.

**Fig. IH8. Calculating payments in lieu of market housing and affordable housing where Policies H2 applies and the total addition to floorspace is 1,000 sq m GIA or more (but below 2,000 sq m GIA)**

**Example 2.1 – scenario: development unable to provide any housing on or off site – GEA estimated**

Total addition to floorspace proposed	1,450 sq m GIA
Self-contained housing floorspace target	$1,450 \times 50\% = 725$ sq m GIA
Additional self-contained housing floorspace provision	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	$700/100 \times 2\% = 14\%$
Affordable housing floorspace target (= shortfall in this scenario)	$725 \times 14\% = 101.5$ sq m GIA
Estimated affordable housing shortfall GEA (GIA x 1.25)	$101.5 \times 1.25 = 126.9$ sq m GEA
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	$126.9 \times £2,650 = £336,285$
Market housing percentage target (100% minus affordable %ge target)	$100 - 14\% = 86\%$
Market housing floorspace target (= shortfall in this scenario)	$725 \times 86\% = 623.5$ sq m GIA
Estimated market housing shortfall GEA (GIA x 1.25)	$623.5 \times 1.25 = 779.4$ sq m GEA
Payment in lieu of market housing (shortfall GEA x £700 psm)	$779.4 \times £700 = £545,580$
<b>Total payment</b> (different affordable and market housing shortfalls)	$£65,455 + £271,390 = \mathbf{£881,865}$

**Example 2.2 scenario: development unable to provide any housing on or off site - GEA provided by applicant**

Total addition to floorspace proposed	1,450 sq m GIA
Total addition to floorspace proposed	1,885 sq m <b>GEA</b>
Self-contained housing floorspace target	$1,450 \times 50\% = 725$ sq m GIA
Capacity	$700 / 100 = 7$ additional homes
Self-contained housing floorspace target <b>GEA</b>	$1,885 \times 50\% = 942.5$ sq m <b>GEA</b>
Additional self-contained housing floorspace provision	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	$7 \times 2\% = 14\%$
Affordable housing floorspace target (= shortfall in this scenario) <b>GEA</b>	$942.5 \times 14\% = 131.9$ sq m <b>GEA</b>
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	$131.9 \times £2,650 = £349,535$
Market housing percentage target (100% minus affordable %age target)	$100 - 14\% = 86\%$
Market housing floorspace target (= shortfall in this scenario) <b>GEA</b>	$942.5 \times 86\% = 810.5$ sq m <b>GEA</b>
Payment in lieu of market housing (shortfall GEA x £700 psm)	$810.5 \times £700 = £567,350$
<b>Total payment</b> (different affordable and market housing shortfalls)	$£349,535 + £567,350 = \mathbf{£916,885}$

**Example 2.3 – scenario: development unable to meet full housing requirement on-site – GEA estimated**

Total addition to floorspace proposed	1,450 sq m GIA
Self-contained housing floorspace target	$1,450 \times 50\% = 725$ sq m GIA
Additional self-contained housing floorspace provision - market	600 sq m GIA
Additional self-contained housing floorspace provision - affordable	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	$700/100 \times 2\% = 14\%$
Affordable housing floorspace target (= shortfall in this scenario)	$725 \times 14\% = 101.5$ sq m GIA
Estimated affordable housing shortfall GEA (GIA x 1.25)	$101.5 \times 1.25 = 126.9$ sq m GEA
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	$126.9 \times £2,650 = £336,285$

Market housing percentage target (100% minus affordable %ge target)	$100 - 14\% = 86\%$
Market housing floorspace target	$725 \times 86\% = 623.5 \text{ sq m GIA}$
Market housing shortfall GIA	$623.5 - 600 = 23.5 \text{ sq m GIA}$
Estimated market housing shortfall GEA (GIA x 1.25)	$23.5 \times 1.25 = 29.4 \text{ sq m GEA}$
Payment in lieu of market housing (shortfall GEA x £700 psm)	$29.4 \times £700 = £20,580$
<b>Total payment</b> (different affordable and market housing shortfalls)	$£336,285 + £20,580 = \mathbf{£356,865}$

**Example 2.4 – scenario: full housing requirement met but no affordable housing - GEA estimated**

Total addition to floorspace proposed	1,450 sq m GIA
Self-contained housing floorspace target	$1,450 \times 50\% = 725 \text{ sq m GIA}$
Additional self-contained housing floorspace provision - market	725 sq m GIA
Additional self-contained housing floorspace provision - affordable	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	$700/100 \times 2\% = 14\%$
Affordable housing floorspace target (= shortfall in this scenario)	$725 \times 14\% = 101.5 \text{ sq m GIA}$
Estimated affordable housing shortfall GEA (GIA x 1.25)	$101.5 \times 1.25 = 126.9 \text{ sq m GEA}$
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	$126.9 \times £2,650 = £336,285$
Market housing percentage target (100% minus affordable %ge target)	$100 - 14\% = 86\%$
Market housing floorspace target	$725 \times 86\% = 623.5 \text{ sq m GIA}$
Market housing SURPLUS GIA	$623.5 - 725 = -101.5 \text{ sq m GIA}$
Estimated market housing SURPLUS GEA (GIA x 1.25)	$-101.5 \times 1.25 = -126.9 \text{ sq m GEA}$
Potential adjustment for market housing surplus (surplus GEA x £700 psm)	$-126.9 \times £700 = -£88,830$
<b>Total payment</b> (affordable housing shortfall only)	<b>£336,285</b>

IH2.120 In Fig. IH9, Examples 3.1 to 3.3 relate to three scenarios where the total addition to floorspace is between 2,000 sq m and 5,000 sq m GIA, so we will expect affordable and market housing to be provided on-site, and the

split between them should reflect the affordable housing percentage target on the sliding scale.

- Example 3.1 shows a scenario that would only be acceptable in exceptional circumstances because there is no on-site or off-site delivery of self-contained housing. The GEA has been provided by the applicant, and this illustrates how the steps in the calculation will vary where GEA is available.
- Example 3.2 shows a scenario where on-site delivery of market housing satisfies a significant proportion of the requirement for self-contained homes arising from Policy H2, but there is no on- or off-site provision of affordable housing, and a substantial payment-in-lieu arises from Policy H4.
- Example 3.3 shows a scenario where affordable housing provision exceeds the target arising from Policy H4 operating in combination with Policy H2, although there is no provision of market housing on- or off-site, and Policy H2 is not fully satisfied. Where the overall addition to self-contained housing is severely constrained, this will represent the Council's preferred scenario, as it prioritises delivery of affordable housing.
- The payment-in-lieu arising from the shortfall of market housing in Example 3.3 is significantly lower than the payment-in-lieu arising from the shortfall of affordable housing in Example 3.2, which may increase its attractiveness as an option for developers.
- Example 3.3 also illustrates how the Council may negotiate to reinvest a proportion of the payment-in-lieu within the development to enhance provision of affordable housing. In this case the additional affordable housing provision exceeds the target by 37.8 sq m GIA, and the calculation suggests that there is potential for this enhanced affordable housing provision to be funded by reinvesting £125,080 from the total payment-in-lieu of £859,950. When negotiating the proportion of the payment-in-lieu needed to fund enhanced affordable housing provision, we will take account of the financial details of the scheme and the cost of the enhanced provision.

**Fig. IH9. Calculating payments in lieu of market housing and affordable housing where Policies H2 applies and the total addition to floorspace is 2,000 sq m GIA or more (but below 5,000 sq m GIA)**

**Example 3.1 – scenario: development unable to provide any housing on or off site - GEA provided by applicant**

Total addition to floorspace proposed	2,730 sq m GIA
Total addition to floorspace proposed	3,139.5 sq m <b>GEA</b>
Self-contained housing floorspace target GIA	$2,730 \times 50\% = 1,365$ sq m GIA
Capacity	$1,400 / 100 = 14$ additional homes
Self-contained housing floorspace target <b>GEA</b>	$3,139.5 \times 50\% = 1,569.7$ sq m <b>GEA</b>
Additional self-contained housing floorspace provision	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	$14 \times 2\% = 28\%$
Affordable housing floorspace target (= shortfall in this scenario) <b>GEA</b>	$1,569.7 \times 28\% = 439.5$ sq m <b>GEA</b>
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	$439.5 \times £2,650 = £1,164,675$
Market housing percentage target (100% minus affordable %ge target)	$100 - 28\% = 72\%$
Market housing floorspace target (= shortfall in this scenario) <b>GEA</b>	$1,569.7 \times 72\% = 1,130.2$ sq m <b>GEA</b>
Payment in lieu of market housing (shortfall GEA x £700 psm)	$1,130.2 \times £700 = £791,140$
<b>Total payment</b> (different affordable and market housing shortfalls)	$£1,164,675 + £791,140 = £1,955,815$

**Example 3.2 – scenario: development unable to meet full housing requirement on-site – GEA estimated**

Total addition to floorspace proposed	2,730 sq m GIA
Self-contained housing floorspace target	$2,730 \times 50\% = 1,365$ sq m GIA
Additional self-contained housing floorspace provision - market	900 sq m GIA
Additional self-contained housing floorspace provision - affordable	0 sq m
Affordable housing percentage target	$1,400/100 \times 2\% = 28\%$
Affordable housing floorspace target (= shortfall in this scenario)	$1,365 \times 28\% = 382.2$ sq m GIA
Estimated affordable housing shortfall GEA (GIA x 1.25)	$382.2 \times 1.25 = 477.7$ sq m GEA
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	$477.7 \times £2,650 = £1,265,905$
Market housing percentage target (100% minus affordable %ge target)	$100 - 28\% = 72\%$
Market housing floorspace target	$1,365 \times 72\% = 982.8$ sq m GIA
Market housing shortfall GIA	$982.8 - 900 = 82.8$ sq m GIA
Estimated market housing shortfall GEA (GIA x 1.25)	$82.8 \times 1.25 = 103.5$ sq m GEA
Payment in lieu of market housing (shortfall GEA x £700 psm)	$103.5 \times £700 = £72,450$
<b>Total payment</b> (different affordable and market housing shortfalls)	$£1,265,905 + £72,450 = £1,338,355$

**Example 3.3 – scenario: affordable housing requirement exceeded but unable to meet market housing requirement on-site – GEA estimated**

Total addition to floorspace proposed	2,730 sq m GIA
Self-contained housing floorspace target	$2,730 \text{ sq m} \times 50\% = 1,365$ sq m GIA
Additional self-contained housing floorspace provision - market	0 sq m
Additional self-contained housing floorspace provision - affordable	420 sq m GIA
Affordable housing percentage target	$1,400/100 \times 2\% = 28\%$
Affordable housing floorspace target	$1,365 \times 28\% = 382.2$ sq m GIA
Affordable housing SURPLUS GIA	$382.2 - 420 = -37.8$ sq m GIA
Estimated affordable housing SURPLUS GEA (GIA x 1.25)	$-37.8 \times 1.25 = -47.2$ sq m GEA
Potential to reinvest payment in lieu in	$-47.2 \times £2,650 = -£125,080$

enhanced affordable housing (surplus GEA x £2,650 psm)	
Market housing percentage target (100% minus affordable %age target)	$100 - 28\% = 72\%$
Market housing floorspace target (= shortfall in this scenario)	$1,365 \times 72\% = 982.8 \text{ sq m GIA}$
Estimated market housing shortfall GEA (GIA x 1.25)	$982.8 \times 1.25 = 1,128.5 \text{ sq m GEA}$
Payment in lieu of market housing (shortfall GEA x £700 psm)	$1,128.5 \times £700 = £859,950$
<b>Total payment</b> (market housing shortfall only)	<b>£859,950</b>

IH2.121 In Fig. IH10, Examples 4.1 to 4.4 relate to four scenarios where the total addition to floorspace is 5,000 sq m GIA or more, generating capacity for 25 additional homes or more and an affordable housing percentage target of 50%.

- Example 4.1 shows a scenario that would only be acceptable in exceptional circumstances because there is no on-site or off-site delivery of self-contained housing. However, it illustrates how the payment can be calculated in the rare circumstances where the shortfall of self-contained housing is made up of equal shortfalls of affordable housing and market housing, and a single payment in lieu can be calculated using a multiplier of £1,350 per sq m.
- Example 4.2 shows a scenario where Policy H4 is satisfied by on-site delivery of affordable housing, but there is no provision of market housing on- or off-site, and Policy H2 is not fully satisfied. This scenario is consistent with the priority we give to affordable housing where the full requirement for self-contained housing cannot be met. It also illustrates the use of lower payment-in-lieu figure per sq m where only market housing is omitted from the development.
- Example 4.3 shows a scenario where the development goes a long way towards satisfying the requirement for self-contained housing in Policy H2, but 60% of the provision is market housing. This scenario leads to a modest payment in lieu of market housing but a substantial payment in lieu of affordable housing. This scenario also illustrates how the steps in the calculation will vary where the GEA has been provided by the applicant.
- Example 4.4 shows a scenario where affordable housing provision exceeds the target arising from Policy H4 operating in combination with Policy H2, although there is no provision of market housing on- or off-site, and Policy H2 is not fully satisfied. Where the overall addition to self-contained housing is constrained, this will represent the Council's preferred scenario, as it prioritises on-site delivery of affordable housing.
- The payment in lieu calculations in Example 4.2 and 4.4 provide the same outcome, as there is no affordable housing shortfall in either



case, and the market housing shortfall is the same in each case. However, Example 4.4 illustrates how the Council may negotiate to reinvest a proportion of the payment-in-lieu within the development to enhance provision of affordable housing.

- In Example 4.4, the additional affordable housing provision exceeds the target by 205 sq m GIA, and the calculation suggests that there is potential for this enhanced affordable housing provision to be funded by reinvesting £678,930 from the total payment of lieu of £1,133,090. When negotiating the proportion of the payment-in-lieu needed to fund enhanced affordable housing provision, we will take account of the financial details of the scheme and the cost of the enhanced provision.

**Fig. IH10. Calculating payments in lieu of market housing and affordable housing where Policies H2 applies and the total addition to floorspace is 5,000 sq m GIA or more**

**Example 4.1 – scenario: development unable to provide any housing on or off site - GEA provided by applicant**

Total addition to floorspace proposed	5,180 sq m GIA
Total addition to floorspace proposed	6,320 sq m <b>GEA</b>
Self-contained housing floorspace target (= shortfall in this scenario) GIA	$5,180 \times 50\% = 2,590$ sq m GIA
Capacity	$2,590 / 100 = 26$ additional homes (ie "25 homes or more")
Self-contained housing floorspace target (= shortfall in this scenario) <b>GEA</b>	$6,320 \times 50\% = 3,160$ sq m <b>GEA</b>
Additional self-contained housing floorspace provision	0 sq m
Affordable housing percentage target	50%
Market housing percentage target (100% minus affordable %ge target)	$100 - 50\% = 50\%$
<b>Payment in lieu of housing</b> (affordable and market housing shortfall are equal so payment = shortfall GEA x £1,350 psm)	$3,160 \times £1,350 = \mathbf{£4,266,000}$

**Example 4.2 – scenario: affordable housing requirement met but unable to meet market housing requirement on-site – GEA estimated**

Total addition to floorspace proposed	5,180 sq m GIA
Self-contained housing floorspace target	$5,180 \times 50\% = 2,590$ sq m GIA
Capacity	$2,590 / 100 = 26$ additional homes (ie "25 homes or more")
Additional self-contained housing floorspace provision - market	0 sq m
Additional self-contained housing floorspace provision - affordable	1,295 sq m GIA
Affordable housing percentage target	50%
Affordable housing floorspace target	$2,590 \times 50\% = 1,295$ sq m GIA
Affordable housing shortfall	0 sq m
Market housing percentage target (100% minus affordable %ge target)	$100 - 50\% = 50\%$
Market housing floorspace target (= shortfall in this scenario)	$2,590 \times 50\% = 1,295$ sq m GIA
Estimated market housing shortfall GEA (GIA x 1.25)	$1,295 \times 1.25 = 1,618.7$ sq m GEA
Payment in lieu of market housing (shortfall GEA x £700 psm)	$1,618.7 \times £700 = £1,133,090$
<b>Total payment</b> (market housing shortfall only)	<b>£1,133,090</b>

**Example 4.3 – scenario: affordable housing requirement and market housing requirement partly met but unable to meet full requirements on-site - GEA provided by applicant**

Total addition to floorspace proposed	5,180 sq m GIA
Total addition to floorspace proposed	6,320 sq m <b>GEA</b>
Self-contained housing floorspace target GIA	5,180 x 50% = 2,590 sq m GIA
Capacity	2,590/ 100 = 26 additional homes (ie "25 homes or more")
Self-contained housing floorspace target <b>GEA</b>	6,320 x 50% = 3,160 sq m <b>GEA</b>
Total additional self-contained housing provision <b>GEA</b>	2,400 sq m <b>GEA</b>
Additional self-contained housing floorspace provision – market <b>GEA</b>	1,420 sq m <b>GEA</b>
Additional self-contained housing floorspace provision – affordable <b>GEA</b>	980 sq m <b>GEA</b>
Affordable housing percentage target	50%
Affordable housing floorspace target <b>GEA</b>	3,160 x 50% = 1,580 sq m <b>GEA</b>
Affordable housing shortfall <b>GEA</b>	1,580 – 980 = 600 sq m <b>GEA</b>
Payment in lieu of affordable housing (shortfall GEA x £2,650 psm)	600 x £2,650 = £1,007,000
Market housing percentage target (100% minus affordable %ge target)	100 – 50% = 50%
Market housing floorspace target <b>GEA</b>	3,160 x 50% = 1,580 sq m <b>GEA</b>
Market housing shortfall <b>GEA</b>	1,580 – 1,420 = 160 sq m <b>GEA</b>
Payment in lieu of market housing (shortfall GEA x £700 psm)	160 x £700 = £112,000
<b>Total payment</b> (different affordable and market housing shortfalls)	£1,007,000 + £112,000 = <b>£1,119,000</b>

**Example 4.4 – scenario: affordable housing requirement exceeded but unable to meet market housing requirement on-site – GEA estimated**

Total addition to floorspace proposed	5,180 sq m GIA
Self-contained housing floorspace target	$5,180 \times 50\% = 2,590$ sq m GIA
Capacity	$2,590 / 100 = 26$ additional homes (ie "25 homes or more")
Additional self-contained housing floorspace provision - market	0 sq m
Additional self-contained housing floorspace provision - affordable	1,500 sq m GIA
Affordable housing percentage target	50%
Affordable housing floorspace target	$2,590 \times 50\% = 1,295$ sq m GIA
Affordable housing SURPLUS GIA	$1,295 - 1,500 = -205$ sq m GIA
Estimated affordable housing SURPLUS GEA (GIA x 1.25)	$-205 \times 1.25 = -256.2$ sq m GEA
Potential to reinvest payment in lieu in enhanced affordable housing (surplus GEA x £2,650 psm)	$-256.2 \times £2,650 = -£- 678,930$
Market housing percentage target (100% minus affordable %ge target)	$100 - 50\% = 50\%$
Market housing floorspace target (= shortfall in this scenario)	$2,590 \times 50\% = 1,295$ sq m GIA
Estimated market housing shortfall GEA (GIA x 1.25)	$1,295 \times 1.25 = 1,618.7$ sq m GEA
Payment in lieu of market housing (shortfall GEA x £700 psm)	$1,618.7 \times £700 = £1,133,090$
<b>Total payment (market housing shortfall only)</b>	<b>£1,133,090</b>

**When will we expect payments in lieu to be made?**

- IH2.122 We will generally expect financial obligations (payments) secured through a S106 agreement to be met (paid) when implementation of a development commences. For most financial obligations, payment upon implementation is necessary to ensure that the required infrastructure or mitigation is in place before the development is occupied, or as soon as possible afterwards. In the case of payments towards housing and affordable housing, payment upon implementation enables us to deliver affordable housing in tandem with non-residential development and market housing, maintaining the mixed-use character of the borough and mixed, inclusive and sustainable communities.
- IH2.123 The Council recognises that small development sites and smaller scale developers can make an important contribution to the delivery of additional homes. The Council also recognises that there may be some

cases where payment upon implementation could seriously harm development finances or cash flow, and potentially prevent the development taking place. For smaller schemes (usually those with capacity for fewer than 10 additional homes), where the applicant demonstrates to the Council's satisfaction that the prospect of development taking place would be seriously harmed by seeking a payment in lieu upon implementation, the Council may agree that the payment can be made later in the development process, or on a phased basis.

### **Payments in lieu and assessing financial viability**

- IH2.124 In negotiating a payment-in-lieu, the Council will also take into account the economics and financial viability of the particular development. Where a payment-in-lieu at the level anticipated by CPG on Planning Obligations would not be viable, the arrangements in paragraphs 2.65 to 2.100 of the Housing CPG 2016 will apply.
- IH2.125 As indicated in paragraph 2.108 of the Housing CPG 2016, financial appraisal mechanisms should not create an incentive towards off-site solutions. In addition to the financial viability appraisal requirements of paragraphs 2.65 to 2.100 of the Housing CPG 2016, the Council may therefore seek financial viability appraisal of the development with and without an on-site contribution, and will seek to ensure that any payment-in-lieu is broadly equivalent to the increase in development value where no contribution is made on-site. The Council may also consider the cost of developing the required percentage of housing/ affordable housing off-site.

## Resources / contacts

*This section replaces the 'Resources/ contacts' sub-section of the Housing CPG 2016.*

### Contacts

Guidance on interpretation of the Local Plan	Strategic Planning and Implementation Team – email <a href="mailto:planningpolicy@camden.gov.uk">planningpolicy@camden.gov.uk</a> Contact Camden - 020 7974 4444
Guidance on our affordable housing priorities and our housing association partners	Camden Council Housing Commissioning and Partnerships Team – <a href="http://camden.gov.uk/ccm/content/contacts/council-contacts/housing/contact-housing-commissioning-team/">http://camden.gov.uk/ccm/content/contacts/council-contacts/housing/contact-housing-commissioning-team/</a>
Guidance on the pre-planning application advice service	<a href="http://www.camden.gov.uk/ppaa">www.camden.gov.uk/ppaa</a> Camden Council Duty Planner Service – email <a href="mailto:planning@camden.gov.uk">planning@camden.gov.uk</a> Contact Camden - 020 7974 4444

### Resources

Camden Local Plan 2017	<a href="http://www.camden.gov.uk/localplan">www.camden.gov.uk/localplan</a>
The London Plan March 2016	<a href="https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan">https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan</a>
Affordable Housing and Viability Supplementary Planning Guidance, Mayor of London, August 2017	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance</a>
Housing Supplementary Planning Guidance, Mayor of London, March 2016	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance</a>
National Planning Policy Framework (NPPF), CLG 2012	<a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a> (March 2012)
National Planning Practice Guidance, CLG 2013 and subsequent	<a href="https://www.gov.uk/government/collections/planning-practice-guidance">https://www.gov.uk/government/collections/planning-practice-guidance</a>

## 4 Residential development standards

*This section replaces Sections 4 and 5 of the Housing CPG 2016.*

### KEY MESSAGES

- Proposals for a new home must seek to comply with the principles set below. Satisfactory housing conditions are a key element to quality of life. As well as shelter, a home must provide a place of rest, relaxation, safety, privacy and space.
- New homes in Camden must comprise a range of affordable and suitably sized properties in a range of tenures to help to address overcrowding in Camden's existing housing stock.
- Proposals comprising more than 5 new homes will be required to provide 10% of the homes for wheelchair users in line with planning policy.

### Introduction

- IH4.1 This section of the CPG relates to the Local Plan chapter on housing, in particular, policies H1, H6 and H7 which seek to create self-contained homes.
- IH4.2 As such, this section should be applied to all planning applications relating to the creation of a new dwelling, i.e. self-contained houses and flats which fall within the Use Classes Order C3/C4 (single family dwellings/ small house of multiple occupation).
- IH4.3 The 'Key Documents' listed below will provide the policy context for creating new homes in Camden. Without repeating information set out in the key documents, the applicant is expected to cross-reference Camden's policies and CPGs with those of the latest publication of regional and national planning policy. Proposals shall be assessed against the relevant considerations set out in these documents.

### Key documents

- DCLG Technical Housing Standards - [Nationally Described Space Standard](#): From the outset of creating a new home the applicant's proposal will need to have addressed the requirements for space standards. Please note that these parameters are minimum requirements and developers are encouraged to exceed these, see [London Plan paragraph 3.36](#).
- [Building Regulations Part M, Volume 1](#): This piece of legislation applies to all new build homes. It sets out standards for 'Access to and use of buildings'. Part M is broken down into 3 categories that are listed below. Regulation M4(1) is mandatory for all new dwellings unless one of the optional requirements, M4(2) or M4(3), applies. Section 4.3 of this CPG provides more detail about the optional requirements and provision of homes specifically for wheelchair users.
  - M4(1): Visitable dwellings
  - M4(2): Accessible and adaptable dwellings – *homes suitable for a wide range of occupants with differing needs including some older people and*

*disabled people, and allowing for adaptation to meet the changing needs of occupants over time*

- M4(3): Wheelchair user dwellings – *includes sub-category (2a) wheelchair adaptable dwellings and sub-category (2b) wheelchair accessible dwellings*
- [Mayor of London's Housing SPG](#): This document, particularly Part 2: Quality and Part 2.3 Dwellings, sets out many of the internal considerations for creating good living spaces.
- [London Plan 2016](#)
- [Camden Local Plan 2017](#) - Chapter 3 'Meeting Housing Needs'
- [Other Camden Planning Guidance](#) (CPG) relevant to the applicant's proposal

### General principles for new homes

- IH4.4 To create self-contained homes that achieve the key aims of this CPG and the policy considerations of national and regional guidance and Camden's Local Plan, the following principles are intended to guide applicants when designing a new home(s).
- IH4.5 The general principles are applicable to all types of self-contained houses and flats including those created through new building, conversions and changes of use. In cases involving residential conversions of listed buildings a sensitive and imaginative approach to satisfying these principles may need to be taken.
- IH4.6 For new build proposals, optional requirements in Building Regulations Part M will apply, and the applicant should also refer to the sub-section '**Wheelchair and accessible and adaptable homes**' and Fig. IH11 below which sets out specific further details that the council will expect the applicant to include as part of a planning application.

### Size

- **Space standards** – Minimum nationally described space standard must be achieved for room sizes as well as the whole home. Any increase in the size is welcome [[Nationally Described Space Standard](#) point 10; [London Housing SPG](#) standard 24].
- **Plans** – Gross Internal Area (GIA) in square metres (sqm) must be annotated on the submitted plans. Rooms shown on plan must realistically illustrate furniture inside them and be of a size that enables the room to function for the purpose for which it is intended [[London Housing SPG](#) standard 25].
- **Wheelchair user dwellings** – This type of home requires larger rooms with spaces for manoeuvrability with furniture to provide Category 3 homes that comply with Part M(3) of the Building Regulations. [See Section 4.3 with Box 1 below and [Building Regulations Part M4\(3\)](#) - with appendix D].

### Layout

In general, the internal layout should seek to ensure the main living room and other frequently used rooms are on the south side and rooms that require less



sunlight (bathrooms, utility rooms) are on the north side. Kitchens are better positioned on the north side to avoid excessive heat gain.

Additionally, it is preferable that permanent partitions are present between eating and sleeping areas; and between kitchens and living rooms. Combined kitchens and living areas can be acceptable where sufficient floor area allows a greater range of activity.

- **Dual aspect** – Proposals should achieve good dual aspect [[London Housing SPG](#) Standard 29]. Habitable rooms should also have suitable outlook.
- **Natural light, Daylight/sunlight** - All the habitable rooms must have direct natural light, particularly the main living room. The applicant must ensure that the levels of daylight and sunlight that enter habitable rooms comply with BRE standards and that the report for 'Daylight and Sunlight' is submitted with the proposal [[London Housing SPG](#) Standard 32; [CPG for Sunlight and daylight](#)].
- **Privacy** – The habitable rooms of a home should provide adequate levels of privacy for the new occupier. This is set out in the [CPG for Overlooking and Privacy and the CPG for Amenity](#). The applicant must ensure all the habitable rooms have a suitable outlook and have suitable privacy. [[Local Plan](#) Policy A1; [London Housing SPG](#) standard 28].
- **Circulation space** – Rooms must be laid out around and accessed via sensible circulation spaces to ensure there is no excessive corridor length or wasted space.
- **Ceiling heights** - A minimum 2.3m headroom for at least 75% of the floor area is required as set out in the [Nationally Described Space Standard](#) technical requirements 10(i). Nonetheless, the applicant is strongly encouraged to provide a new home with a ceiling height of 2.5m for at least 75% of its gross internal area (GIA) as set out in the [London Housing SPG](#) standard 31. A higher ceiling will aid natural ventilation of a home particularly in Central London where there is a heat island effect; and will additionally raise the quality of the new home in terms of light and a sense of space.
  - Flexibility will be applied where an existing property is to be subdivided to form new self-contained homes, but as a minimum, a headroom of 2.3 metres will be required for any new home created through a conversion, across at least 75% of the GIA as set out in the [Nationally Described Space Standard](#) technical requirements 10(i).
  - It is also important to note headroom for storage areas and their inclusion in calculating the GIA of a new home [[Nationally Described Space Standard](#) technical requirements 10(f) and 10(g)].
  - Please refer to [CPG for Amenity and CPG for Basements and lightwells](#) for details about natural light and outlook to basement flats.
- **Accessible and adaptable dwellings, and wheelchair user dwellings** M4(2) or M4(3) – These proposed homes shall meet Building Regulations part M4(2) or M4(3)(2)(a) or (b) and [London Housing SPG](#) standard 11 and [Local Plan](#) Policy H6. A specific Planning Condition shall be added to the decision notice that will specify which unit(s) on the approved plans are for M4(2), M4(3)(2)(a) and M4(3)(2)(b) [see the sub-section 'Wheelchair and accessible and adaptable homes' and Fig. IH11 below].
- **Storage** – Adequate storage space should be provided in accordance with Table 1 in the [Nationally Described Space Standard](#). Provision of a utility room for a washing machine and drying area is particularly welcome for

family homes. Space must also be provided for storing separated and sorted waste for recycling [[CPG for Design](#); [Local Plan](#) Policy CC5; [London Housing SPG](#) standards 22 & 23].

- **Stacking** – ‘Like’ rooms must be placed above one another i.e. living rooms above living rooms, bedrooms above bedrooms to reduce the problem of noise disturbance between adjoining properties. This is particularly important for new homes created by subdivision of an existing dwelling.
- **Demountable partitions** – Where possible, these should be inserted to enable adaptation with the changing circumstances of residents. [[London Housing SPG](#) paragraph 2.3.28]. NB: where grab rails are required for the needs of disabled or elderly occupants, this type of wall will not be suitable.
- **Climate change mitigation** – The applicant must consider the overheating and ventilation of rooms. This includes the prevention of the need for mechanical cooling [[London Housing SPG](#) standards 34, 35 & 36; [CPG for Sustainability](#)].
- **Basements** – This space must meet the design and size considerations set out in the [CPG for Basements](#) which supports [Local Plan](#) Policy A5.

### Amenity

- **Amenity of neighbours** – The proposal should not have a significant detrimental impact to neighbouring amenity in terms of neighbouring outlook, privacy, sunlight, daylight, noise or vibration. Additionally, the proposal should not result in any overlooking into neighbouring habitable rooms. [[Local Plan](#) Policy A1; [CPG for Design](#) and [CPG for Overlooking and Privacy](#)].
- **Outdoor space** – All new homes should have access to some form of private outdoor amenity space, e.g. balconies, roof terraces or communal gardens. Existing gardens and green space should be retained. New homes should meet the open space standard of 9sqm per resident or 0.74sqm per worker in a mixed use development [[Local Plan](#) Policies A1, A2 & A3; [CPG for Open Space](#)] [[London Housing SPG](#) standards 26 & 27].

### Parking

- **Cars** – The new home must comply with Camden's Car-free policy. The Council will limit the availability of parking and require all new developments to be car-free [[Local Plan](#) Policy T2]
- **Disabled parking** – Proposals requiring disabled parking must incorporate Blue Badge parking spaces into the scheme [[CPG for Transport](#); [Local Plan](#) Policy T2].
- **Cycle** – A suitable number of secure covered cycle spaces or storage space for them must be provided [[London Housing SPG](#) standards 20 & 21; [Local Plan](#) Policy T1; [CPG for Transport](#); [London Plan table 6.3](#)].

### Wheelchair and accessible and adaptable homes

IH4.7 In accordance with [London Housing SPG](#) standard 11 and [Local Plan](#) Policy H6, new build homes will be required to comply optional requirements under [Building Regulations Volume 1, Part M](#), as follows:

- 90% of new build homes will be required to comply with the requirements of category M4(2) for accessible and adaptable

dwellings – these are homes that are suitable for occupants with differing needs, including some older people and disabled people, and allow for adaptation to meet the changing needs of occupants over time; and

- 10% of new build homes will be required to comply with the requirements of category M4(3) wheelchair user dwellings – these are homes that meet the needs of occupants who use wheelchairs, or allow for simple adaptation to meet their needs.

- IH4.8 Paragraph 3.153 of the [Local Plan](#) states that “the Council will round the number of homes required in each category to the nearest whole number such that the total requirement for M4(2) and M4(3) dwellings adds up to 100%. The Council will not require M4(3) wheelchair user dwellings as part of developments that provide five additional dwellings or fewer”. Consequently, proposals comprising 5 or less additional new build homes should provide M4(2) compliant homes, but will not be required to provide M4(3) compliant homes.
- IH4.9 When designing a home for a wheelchair user, the applicant is advised to take note of the general principles for M4(3) homes set out in Fig. IH11 below. These particular details are considered important for submission of a planning application.
- IH4.10 Where the applicant has proposed a wheelchair user home and/or a number of homes as part of a new build development the submitted plans must be annotated to clearly show which homes are designated as either M4(2) or M4(3)(2)(a) and/or M4(3)(2)(b). This will allow the Council to secure these homes by a Planning Condition to the approved plans.

**The standard planning condition for homes designated as M4(2) accessible and adaptable dwellings will be:**

Units X – X, as indicated on plan number/s hereby approved shall be designed and constructed in accordance with Building Regulations Part M4(2), evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation.

**Reason:** To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of Policy H6 of the Camden Local Plan 2017.

**Note:** Conditions should include a requirement to submit evidence demonstrating compliance as it is the responsibility of the person carrying out the development to let the Building Control body know about any conditions setting an optional requirement under the Building Regulations.

**The standard planning condition for homes designated as M4(3)(2)(a) wheelchair adaptable dwellings and/or M4(3)(2)(b) wheelchair accessible dwellings will be:**

Units X – X, as indicated on the plan number/s hereby approved shall be designed and constructed in accordance with Building Regulations Part M4(3)(2)(a) or M4(3)(2)(b)\* Evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation.

\*SPECIFY WHETHER WHEELCHAIR ADAPTABLE (2)(a) OR WHEELCHAIR ACCESSIBLE (2)(b).

**Reason:** To ensure that the wheelchair units would be capable of providing adequate amenity in accordance with Policy H6 of the Camden Local Plan 2017.

**Note:** Conditions should include a requirement to submit evidence demonstrating compliance as it is the responsibility of the person carrying out the development to let the Building Control body know about any conditions setting an optional requirement under the Building Regulations.

**Fig. IH11. General Principles for wheelchair user dwellings, M4(3)**

- [Wheelchair adaptable dwellings M4\(3\)\(2\)\(a\)](#) – In accordance with the key documents listed in paragraph IH4.3, in particular the Building Regulations, applicants are advised that:
  - Submitted plans should demonstrate how easy it will be to alter a home in order to meet the future spatial and functional provisions of a wheelchair user.
  - Specific habitable rooms should be proposed with extra internal space that will allow for wheelchair manoeuvrability and a lifting platform where necessary.
  - It is preferable that future adaptation would not involve the loss of an existing room eg by requiring a wall to be knocked down to provide extra space. The loss of a room in the future may affect the suitability of the dwelling for its existing occupiers, particularly if it involves the loss of a bedroom.
- [Wheelchair accessible dwellings M4\(3\)\(2\)\(b\)](#) - In accordance with the key documents listed below paragraph IH4.3, in particular the Building Regulations, applicants are advised that:
  - Submitted plans should demonstrate that all internal and external accesses are level with adequate widths and circulation areas as set out in M4(3) to internal doorways, storage spaces and attached outdoor spaces.
  - All rooms must be step-free.
  - *Kitchen* – submitted drawings should be at a scale of 1:20, illustrating position of furniture.
  - *Bedrooms* – at least one bedroom to be close to an accessible bathroom that has wheelchair manoeuvring space.
  - *Bathroom* – ensure that correct bathroom/ cloakroom provision has been provided for the size of unit.
  - *Built in storage* – is applicable per bedroom within the home.
  - *Car parking* – will be discussed having regard to [Local Plan](#) Policy T2 Parking and car-free development.
  - *Cycle parking* – the Council encourages space provision for a non-traditional/ adaptable bike.

## 7 Water efficiency

### KEY MESSAGES

- At least 50% of water consumed in homes and workplaces does not need to be of drinkable quality re-using water.
- All developments are to be water efficient.
- Developments over 10 units or 1000sq m should include grey water recycling.

7.1 Core Strategy Policy CS13 protects the borough's existing water infrastructure to ensure we have an adequate water supply as well as adequate water storage and foul water capacity. Development Policy DP23 expects all developments to be designed to be water efficient and to minimise the need for further water infrastructure.

7.2 This section outlines what measures the council will expect to ensure developments reduce the consumption of water and reduce the amount of water that is disposed of.

### WHAT DOES THE COUNCIL EXPECT?

The Council expects all developments to be designed to be water efficient by minimising water use and maximising the re-use of water. This includes new and existing buildings.

### Minimising water use

7.3 The simplest way of doing this is through installing efficient water fittings and plumbing, such as

- dual flush toilets;
- low flow taps and shower heads; and
- low water consuming washing machines and dishwashers.

7.4 Your development will need to use a range of these measures to reduce their water consumption. Specifications should be practical for the intended occupier to ensure that fittings are not simply replaced.

7.5 Your development should include meters which are visible to occupants, as this has been shown to result in reductions in water use.

7.6 We will assess the performance of water minimisation measures used against the water category in BREEAM (see section 8 on sustainability assessments for more information).

### Maximising the re-use of water

7.7 At least 50% of water consumed in homes and workplaces does not need to be of drinkable quality. For example, rain water can be water used for flushing toilets, washing laundry and watering plants and gardens.

### Collecting rain water

- 7.8 This involves collecting rainwater from a building's roof, as well as its surroundings, and storing it in a tank. Once filtered of leaves and larger objects, the water can be re-used for toilet flushing, laundry and watering plants. If used outside, the rain water harvesting system can take the form of a simple water butt. If used within the building it will need to be supplied through pipes and taps that are separate from the standard mains water supply.



#### WHAT WILL THE COUNCIL EXPECT?

The Council will require buildings with gardens or landscaped areas that require regular maintenance to be fitted with water butts.

### Green/brown roofs and collecting rain water

- 7.9 Green/brown roofs can be designed to include rain water collection. However, more consideration needs to be given to the materials and pipe work that will go underneath the green/brown roof structure. Green/brown roofs with rainwater harvesting may also need to use extra filters to ensure the water can be re-used. See section 10 for more information on green/brown roofs.

### Re-using water

- 7.10 'Grey water' (water that has already been used in hand basins, baths and showers) can be stored, filtered and disinfected, and then reused, for toilet flushing, garden watering or laundry. It is also possible to recycle 'black water' (water used for toilet flushing and washing up) although this is more resource intensive. Both 'grey water' and 'black water' systems will require regular maintenance to ensure their ongoing quality and effectiveness. A separate standard mains supply will also always be needed in addition to provide drinking water.

The Council will require developments over 10 units or 1000sq m and/or intense water use developments, such as hotels, hostels, student housing etc to include a grey water harvesting system, unless the applicant demonstrates to the Council's satisfaction that this is not feasible.

- 7.11 When considering the feasibility of grey water systems applicants should consider
- The cost of the system;
  - Cost savings for owner/occupier over a 10 year period;
  - Projected grey water generation;
  - Projected demand for use of grey water; and

- Water savings as a result of the grey water system.

**Further information**

The Environment Agency produces a range of guidance about how to conserve and reduce water consumption.

- Conserving Water in Buildings: Fact Sheets, Environment Agency,
- Greywater: An information guide, Environment Agency, 2008
- Harvesting rainwater for domestic uses, Environment Agency, 2008

They are all available on the EA website:

[www.environmentagency.gov.uk](http://www.environmentagency.gov.uk)





## 8 Sustainable use of materials

### KEY MESSAGES

- Reduce waste by firstly re-using your building, where this is not possible you should implement the waste hierarchy.
- The waste hierarchy prioritises the reduction, re-use and recycling of materials.
- Source your materials responsibly and ensure they are safe to health.

- 8.1 This guidance relates to Core Strategy policy CS13 - *Tackling climate change through promoting higher environmental standards* in design and construction. It encourages developments to be sustainable: through the choice of appropriate materials which will assist in minimising energy needs both during construction and occupation periods and by making efficient use of resources.
- 8.2 It also relates to Development Policy DP22 - *Promoting sustainable design and construction* which encourages developments to conserve energy and resources through the use of recycled and renewable buildings materials.
- 8.3 This guidance shows how you can minimise the use of resources through your choice of materials to limit the environmental impact of developments. You can achieve this by focusing on the sustainable (re)use of existing materials as far as possible before considering introducing new materials. There are 5 key measures:
1. Managing existing resources;
  2. Specifying materials using the Building Research Establishment's Green Guide to Specification;
  3. Ensuring that materials are responsibly sourced;
  4. Minimising the harmful effects of some materials on human health; and
  5. Ensuring that specified materials are robust and sensitive to the building type and age.

### Managing existing resources

- 8.4 Most development sites have existing materials which can be re-used, recycled or obtained from nearby development sites. You should always look for options to sensitively re-use, refurbish, repair and convert buildings, rather than wholesale demolition (see Camden Development Policies paragraph 22.4). This will reduce the amount of resources used and will help reduce construction waste.
- 8.5 Where the retention of a building or part of a building is not possible, you should aim to tackle the quantity of waste produced - from the demolition