

## Housing choice and mix

- 3.136 The Council aims to achieve mixed, inclusive and sustainable communities by seeking a range of housing types suitable for households and individuals with different needs. Seeking a range of housing types, sizes, accessibility and affordability will help us deliver the Camden Plan by tackling inequality, creating sustainable and resilient neighbourhoods, improving health and wellbeing and securing a supply of housing suitable for individuals and families on low and middle incomes. Tailoring housing types to people's particular needs will also help us ensure the right housing for Camden's diverse communities in line with the recommendations of the Equality Taskforce.
- 3.137 Development sites in Camden typically cater for fewer than 100 homes, and it will not be feasible to include a very wide range of housing in every development. Where housing is proposed we will prioritise development of self-contained housing in accordance with Policy H1, including affordable housing. We will require new homes to meet standards for internal space and accessibility and provide a mix of dwelling sizes. We will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet general and particular needs. Given the limited size and high value of development sites in the borough, it will be challenging to deliver some of the housing types needed in Camden, particularly serviced plots for self-build housing and pitches for Camden's traveller community. Consequently, where larger sites do come forward (0.5 ha or greater), we will expect housing development to provide for particular housing needs including the needs of self-builders, taking into account the characteristics and constraints of the site and area.
- 3.138 Individual policies in this section of the Plan address the specific housing needs of a number of groups in our community:
- Policy H6 addresses the overall need for a mix of housing types, the particular needs of people with mobility difficulties and wheelchair users, the needs of service families, and the needs of people wishing to build their own homes;
  - Policy H7 addresses the size of homes (number of bedrooms) needed for large and small families with children, single people, couples and other types of household;
  - Policy H8 addresses homes for older people, homeless people and vulnerable people;
  - Policy H9 addresses the housing needed for students;
  - Policy H11 addresses the accommodation needs of gypsies and travellers and travelling showpeople.

## Policy H6 Housing choice and mix

The Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs.

We will seek to secure high quality accessible homes in all developments that include housing. We will:

- a. encourage design of all housing to provide functional, adaptable and accessible spaces;
- b. expect all self-contained homes to meet the nationally described space standard;
- c. require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); and
- d. require 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

We will seek to secure a variety of housing suitable for existing and future households overall across development in the borough. When considering future site allocations and negotiating the types of housing included in each development, we will:

- e. seek a diverse range of housing products in the market and affordable sectors to meet the needs across the spectrum of household incomes;
- f. promote Starter Homes in accordance with government requirements;
- g. support the development of private rented homes where this will assist the creation of mixed, inclusive and sustainable communities;
- h. seek provision suitable for families with children, older people, people with disabilities, service families, people wishing to build their own homes and Camden's traveller community; and
- i. require a range of dwelling sizes in accordance with "Policy H7 Large and small homes".

Where housing is proposed as part of development with a site area of 0.5 ha or greater, we will expect the development to make provision for particular housing needs. For such sites, the Council will particularly seek to address the need for serviced plots available to people wishing to build their own homes but may also support the inclusion of housing for older people or vulnerable people, student housing, or other housing with shared facilities. In considering the scale and nature of provision for particular housing needs that would be appropriate, the Council will take into account:

- j. criteria in Policies H8, H9, and H10 where applicable;
- k. the character of the development, the site and the area;
- l. site size, and any constraints on developing the site for a mix of housing including provision for particular housing needs;
- m. the impact on creation of mixed, inclusive and sustainable communities;

- n. the impact of provision for particular housing needs on the efficiency and overall quantum of development;
- o. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- p. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

### High quality accessible homes

- 3.139 Many aspects of housing quality have a critical impact on the health and well-being of occupiers. These aspects of quality include the external environment, the condition of the property and its state of repair and decoration, accessibility, internal space and number of bedrooms, separation between functions such as kitchens, living rooms and bedrooms, adequate noise insulation, and daylight and sunlight and all of which can affect physical and mental health and influence life chances. The Council will therefore seek to secure a variety of high quality housing to meet the needs of different users, and will not sacrifice quality in order to maximise overall housing delivery.
- 3.140 Housing should be designed with regard to:
- relevant policies throughout the Plan, particularly Policy C6 Access for all, and policies relating to Protecting amenity, Design and Heritage, Sustainability and climate change and Transport;
  - our supplementary planning documents, known as Camden Planning Guidance, particularly Camden Planning Guidance on design, housing, sustainability, amenity and transport;
  - Supplementary Planning Guidance issued by the Mayor of London; and
  - Building for Life - the industry and government endorsed standard for well-designed homes and neighbourhoods.
- 3.141 Housing should also be designed to take account of changes in the age profile of Camden residents, and particularly the growth in the number of older people. One aspect of this is an increase in the number of people with dementia. Considering dementia when designing homes can help people to stay in their own homes as they get older. Helpful aspects include a focus on good natural light and lighting, safety, security, accessibility and ease of use.
- 3.142 London Plan Policy 3.5 indicates that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose and meet the changing needs of Londoners over their lifetimes. The Local Plan therefore encourages design of all new housing to provide functional, adaptable and accessible spaces. In addition, the Local Plan applies specific space standards to all proposals for new self-contained homes, and applies specific accessibility requirements to all proposals for new-build homes that are self-contained, as set out in the following paragraphs.

### Space standards

- 3.143 A high quality home should be designed to ensure sufficient space is available for furniture, activity and movement. The government has produced a 'nationally

described space standard' which local plans can adopt to ensure that homes are designed with sufficient internal space. The standard sets out the minimum acceptable gross internal area in square metres depending on the number of bedrooms, the number of intended occupiers, and the number of storeys. The nationally described space standard was formally incorporated into the London Plan in March 2016 (Table 3.3 on page 103), and also forms part of Local Plan Policy H6.

- 3.144 The Mayor's Housing SPG advises that the nationally described space standard should be applied to all new dwellings, whether they are created through new-building, conversions or changes of use. Where dwellings will be created from conversions or changes of use, the Council will apply the nationally described space standard flexibly taking into account the constraints arising from conversion of existing buildings, particularly listed buildings and other heritage assets.
- 3.145 In accordance with the Mayor's Housing SPG, applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against Policy H6 requirements relating to space standards.
- 3.146 Specific arrangements apply to considering the standard of internal spaces in developments of specialist housing and housing with shared facilities. These are set out in paragraphs 3.159 and 3.160 of the Plan.

#### **Accessible and adaptable dwellings (Lifetime Homes) and wheelchair user dwellings**

- 3.147 Lifetime Homes are dwellings specifically designed to support the changing needs arising through a family's lifecycle, incorporating features to help accommodate pregnancy, prams and pushchairs, injury, disability, and old age. These features also allow a dwelling to be easily adapted for even higher levels of accessibility in the future, if the need arises, allowing people to live in their own home for as much of their life as possible. Wheelchair housing is designed to more demanding criteria relating to ease of movement and activity and is intended to be easy to adapt for households that include someone who needs to use a wheelchair within the home.
- 3.148 Since 2006, the Council has been using planning policies to ensure that new homes meet Lifetime Homes criteria wherever possible, and that 10% of new homes meet wheelchair housing standards. Since 2010, the Council has also required any wheelchair housing provided for social rent to be fully fitted out to meet the needs of a future wheelchair user.
- 3.149 The government has produced optional Building Regulations which can be used to increase the accessibility of new build homes to people with mobility difficulties. Where accessibility requirements are warranted by local circumstances and are financially viable, the optional Building Regulations can be incorporated in local plan policy and applied to specific homes in a development through planning conditions. A requirement to comply with optional Building Regulations was formally incorporated into the London Plan in March in 2016, and equivalent measures are also included in Policy H6.

- 3.150 The optional Building Regulations in approved document Part M4 include Category 2 for “accessible and adaptable dwellings”. This is known as M4(2), and is broadly equivalent to satisfying Lifetime Homes criteria. Approved document Part M4 also includes Category 3 for “wheelchair user dwellings” – known as M4(3). Part M4(3) further distinguishes between “wheelchair accessible” dwellings (homes readily useable by a wheelchair user at the point of completion) and “wheelchair adaptable” dwellings (homes that can be easily adapted to meet the needs of a wheelchair user).
- 3.151 Policy H6 includes a requirement for 90% of new build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair user dwellings). These requirements are consistent with the London Plan and apply across London. Information about where we will require “wheelchair accessible” dwellings and where we will require “wheelchair adaptable” dwellings is provided in paragraph 3.155.
- 3.152 Compliance with Optional Building Regulations can only be required by planning condition where Part M of the Building Regulations applies. Part M applies to new-build dwellings, but does not apply to dwellings created by changes of use or conversions of an existing building. Planning conditions can also only be used where all elements of the relevant Regulation can be achieved. They cannot be applied to a dwelling where step-free access cannot be achieved. Circumstances where a planning condition may be inappropriate include flats above or below the entry level in a building where incorporation of a lift would not be viable. Information about the provision of lifts is contained in paragraph 3.48A of the London Plan and paragraphs 2.3.10 to 2.3.11 of the Mayor’s Housing SPG.
- 3.153 In applying the requirement for 90% M4(2) accessible and adaptable dwellings and 10% M4(3) wheelchair user dwellings, 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.
- 3.154 The Council will generally apply the requirement for 10% wheelchair user dwellings across each housing type or tenure in a scheme, seeking 10% of market housing, 10% of social-affordable rented housing and 10% of intermediate housing. We may seek to increase the percentage of wheelchair user dwellings in the social-affordable sector and reduce the percentage in the market or intermediate sectors, or both, where this will enable us to meet an identified need for wheelchair users in social-affordable housing.
- 3.155 In the market and intermediate sectors, we will use planning conditions to secure wheelchair user dwellings that comply with Part M4(3)(2)(a) requirements for “wheelchair adaptable” dwellings. Households that include a wheelchair user are much more likely to occupy social rented housing than other tenures, and the waiting list for wheelchair user dwellings far exceeds supply. In the case of social-affordable rented housing, future occupiers can be nominated from the Housing Register (waiting list), and from transfer lists. The Council will therefore require 10% of social-affordable rented housing in each development to be “wheelchair accessible” and be fully fitted-out for occupation

by a household containing a wheelchair user. We will use planning conditions to specify those social-affordable homes that must comply with Part M4(3)(2)(b) requirements for “wheelchair accessible” dwellings.

- 3.156 The Council expects all new developments to be car free, where no provision for resident parking is made within the development or on the street (see “Policy T2 Parking and car-free development”). However, wheelchair users may need access to a car as a consequence of their disability. The Council will generally expect the parking needs of wheelchair users to be met on street, but may exceptionally seek suitably located and designed off-site parking to serve wheelchair accessible dwellings, particularly large wheelchair accessible dwellings (3 bedrooms or more).
- 3.157 In accordance with the Mayor’s Housing SPG, applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against “Policy H6 Housing choice and mix” requirements relating to accessibility.
- 3.158 Specific arrangements apply to considering accessibility in developments of specialist housing and housing with shared facilities. These are set out in paragraphs 3.159 and 3.160 of the Plan.

#### **Space and accessibility for specialist housing and shared housing**

- 3.159 The Mayor’s Housing SPG advises that the nationally described space standard and the optional Building Regulations do not apply to specialist forms of housing such as student housing and care homes. However, the space needed for furniture, activity and movement should be considered when designing all forms of housing, and the Council will expect all proposals to provide adequately sized rooms and convenient and efficient room layouts that are functional and fit for purpose.
- 3.160 Houses and flats shared by 3-6 people who do not live as a family (small houses in multiple occupation, Use Class C4) can change to Use Class C3 without a planning application under the freedom provided in legislation. Proposals for homes in Use Class C4 should be designed to comply with Policy H6 in respect of space standards and optional Building Regulations if they are to benefit from the freedom to change to Use Class C3. Where homes in Use Class C4 do not comply with these aspects of Policy H6 we will consider using planning conditions to remove the freedom to change to self-contained homes. The Council has also agreed minimum standards for housing with shared facilities under the Housing Act 2004, please see “Policy H10 Housing with shared facilities (‘houses in multiple occupation’)” for more information.

#### **Variety of housing suitable for existing and future households**

##### **Range of products including intermediate housing and Starter Homes**

- 3.161 As indicated in paragraph 3.137 of the Plan, we will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet the general and particular needs of existing and future households. We will consider all the needs identified by Policy H6, including those addressed

in detail by Policies H7, H8 and H9. The following paragraphs provide more information about particular needs that are not fully explained in other parts of the Plan.

- 3.162 The split between affordable housing and market housing will not secure housing suitable for households across a full range of incomes in Camden. There are wide gaps between the cost of housing at target social rents and the very cheapest privately rented housing, and between the costs of the cheapest private rented housing and the cost of entering owner-occupation. Local housing allowance (the benefit provided to help with private rents) is generally insufficient to cover the full cost of privately rented housing.
- 3.163 These gaps are particularly wide in the case of large homes (with 3 or more bedrooms) and there is a growing risk that middle-income households will be squeezed out of Camden by housing costs, particularly those with children. The outcome could be social polarisation between low income households in social-affordable rented accommodation and high income households in owner-occupation.
- 3.164 Intermediate housing is intended to bridge the gap between social-affordable rented housing and market housing. High capital values in Camden make it highly challenging to provide intermediate housing in the form of shared-ownership housing that meets the income thresholds set out in the London Plan. For intermediate housing to tackle social polarisation effectively, it therefore needs to include homes for intermediate rent and other innovative intermediate housing products that can be made affordable to a wider range of groups than homes for shared-ownership.
- 3.165 The Housing and Planning Act 2016 provides for the introduction of Starter Homes as a way to help first-time buyers who are at least 23 years old but not yet 40 to buy their own home at a discount price. Starter Homes should be offered at a discount of at least 20% below market value, and are subject to a price cap (in London the price cap has been set initially at £450,000, based on the average price paid by a first-time buyer).
- 3.166 The Housing and Planning Act 2016 requires councils to promote Starter Homes. The government has consulted on proposed Starter Homes Regulations that would require certain types of development to include a set percentage of Starter Homes. “Policy H6 Housing choice and mix” provides for the Council to comply with Starter Home requirements once they come into effect.
- 3.167 Further guidance on how the Council will seek a variety of intermediate housing types and comply with government requirements relating to Starter Homes will be included in as necessary in our supplementary planning document Camden Planning Guidance on housing.

#### **Private rented homes**

- 3.168 Census data indicates that the share of households in private rented homes in Camden grew from 23.5% in 2001 to 32.3% in 2011, an addition of almost 10,000 households. In the same period, the share of households in social rented housing fell from 37.4% to 33.1%, a reduction of almost 2,000 households. The private rented sector is currently the largest source of housing for people who are not eligible for social rented housing and cannot afford to buy. Private

renting is thought to play a significant role in limiting the social polarisation in the borough, and the Council will seek to actively foster the sector and support private tenancies for people in housing need.

- 3.169 Historically private rented homes have often been regarded as badly maintained properties suffering from overcrowding, hazards, poor facilities and insecure tenancies. The Council is actively working to improve the quality of accommodation in the private rented sector through the introduction of additional licensing (which provides for more inspection of privately rented houses in multiple occupation) and through the London Landlord Accreditation Scheme that the Council operates on behalf of authorities across the capital. We are also piloting our own local lettings agency, Camden Homes, which aims to provide an outstanding property management service for landlords and tenants.
- 3.170 The government and the Mayor are promoting the growth of a new development sector building homes specifically for private rent. Such a sector could potentially appeal to investors seeking a consistent long-term return, attracting a new source of finance into house-building, and also attract a new style of market developer involved in long-term management of the stock. We consider that build-to-let housing could potentially help to increase overall housing output in Camden, and could also help to fill part of the gap between social-affordable rent and owner-occupation. However, the turnover of occupiers of private rented housing tends to be rapid (particularly given its popularity amongst young adults and students), so localised concentrations could potentially harm the stability and sustainability of a community.
- 3.171 Build-to-let development may well attract less interest from families than development for market sale, and a different mix of dwelling sizes may be appropriate. Financial viability for build-to-let development is different from developments built for sale because returns are realised over a longer period, and may mean that the appropriate level of affordable housing provision is lower. The Council will be flexible in the application of affordable housing and dwelling size policies to development of build-to-let housing where we consider such housing will help to create mixed, inclusive and sustainable communities. We consider that build-to-let has the best potential to contribute to a sustainable community where occupiers are able to secure leases for longer periods such as 2-5 years, where a long-term commitment is in place to secure the management of the private housing element as rented accommodation, and affordable housing is provided on-site.

### **Service families**

- 3.172 The NPPF indicates that councils should plan for a mix of housing to meet the needs of various groups including the needs of service families. The government has made a number of commitments regarding housing members of the armed forces, including a requirement for councils to give additional preference to seriously injured service personnel who have urgent housing needs, referral schemes with a number of housing associations, tailored low cost home ownership schemes and assistance for necessary adaptations for injured service people.
- 3.173 The 2011 Census suggests that there are approximately 160 service personnel living in Camden, around a quarter of whom live in communal establishments.



Regent's Park Barracks is located in the borough, and is thought to be a home of a number of Camden's service personnel. Camden's Local Plan policies seek provision of affordable housing, including intermediate housing such as low cost home ownership, and seek housing to suit people with mobility difficulties and other support needs. We consider that the needs of members of the armed forces and their families can be met by giving them appropriate priority in the allocation of the housing intended to meet the needs of the wider community. Through the housing allocation scheme for social-affordable rented homes, the Council gives additional preference to current and former members of the armed forces with a recognised housing need. The Council has also included service families in its priority list for intermediate housing.

### **People wishing to build their own homes**

- 3.174 The NPPF indicates that councils should plan to meet the needs of people wishing to build their own homes. This is understood to refer to self-build and custom-build arrangements where prospective occupiers substitute their own skills for some of the services usually provided by a speculative developer. Self-build generally refers to people who bring their own building skills to bear as part of the construction process, whereas custom-build more often involves people who can provide professional services such as architecture or project management. In some cases custom-build can simply involve people who procure other professionals to build a bespoke home to personal specifications rather than a speculative home built to a standard design.
- 3.175 The London Strategic Housing Market Assessment 2013 (London SHMA) indicates that self-build provides 32% of new homes in Wales and 23% in Scotland, compared with only 4% in England, and possibly as little as 2.1% in London. The government envisages that self-build could be promoted in England as a way of increasing overall housing output.
- 3.176 The London SHMA suggests that typical self-build sites in London are small infill sites, end of terrace spaces, backland sites, gardens, garages and small industrial sites. Based on records of completed new-build housing schemes involving a single new home, the London SHMA estimates that self-build output in London from 2009 to 2013 amounted to between 1.9% and 3.5% of the total. The London SHMA notes a survey that has indicated 13% of Londoners appear to be researching self-build (similar to the national average) but only 2% are actively working towards acquiring a site, submitting a planning application or starting construction work. The London SHMA also documents some group self-build activity in London, usually in partnership with councils or registered providers such as housing associations. The London SHMA concludes that single unit self-build schemes are most likely to be practicable in low-cost parts of London, and group self-build has the best potential to deliver significant additional housing output in higher cost areas.
- 3.177 Land costs in Camden are extremely high, and the majority of housing output takes the form of flats built at relatively high densities. Consequently, the potential for people to acquire a site and use their own building skills to provide low cost homes is very limited. However, there is some evidence to suggest that custom-build for wealthier households is quite common in northern parts of the borough with a more suburban character. These sometimes involve infill sites

and sometimes involve redevelopment of an existing residential plot. There may also be some interest in group self-build involving council-owned land, possibly in association with the Community Investment Programme.

- 3.178 Development monitoring records for Camden (2009/10 to 2013/14) show that an average of 40 additional homes per year were completed in single unit schemes (around 9.7% of the output of self-contained homes), although more research would be needed to determine how many of these involved speculative development. It seems likely that custom-build is making a significant contribution to Camden's housing output, albeit probably involving households with high incomes. With respect to the wider community the conclusions of the London SHMA are likely to hold good in Camden, with group self-build offering the best potential for significant additional output and for lower income households to be involved in building their own home.
- 3.179 The Self Build and Custom Housing Building Act 2015 passed in March 2015 requires councils to create a public register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. The Act also provides for government to issue regulations about what the register should include and how it should work. Late in 2015, the GLA launched a Build Your Own London Home register, intended to run for one year and assist the GLA in assessing the level of interest in developing self-build and custom-build homes. The Council launched its own register for prospective self-builders in April 2016.
- 3.180 Through the Housing and Planning Act 2016, the government requires councils to give permission for enough serviced plots to meet the demand for self-build and custom-build homes. The Act also provides a mechanism for councils to seek an exemption from this requirement.
- 3.181 There are no large areas of unused, underused or cleared land in Camden that would provide an immediate opportunity to create serviced plots. Furthermore, self-build and custom-build housing are likely to involve low density development, which would make it very hard for a prospective self-builder to compete with other developers to acquire land, and would also represent an underuse of land in many parts of Camden, in conflict with "Policy H1 Maximising housing supply". Given these constraints, the Council considers that the best prospect for bringing forward suitable land will be in conjunction with development of a large site involving other types of housing, and has made provision in Policy H6 for development of sites of 0.5 ha or greater to include serviced plots for self-build and custom-build.
- 3.182 There is no recent history of land in Camden being parcelled and sold in this way, so the strength of the market and land values that could be supported are uncertain. The Council may therefore allow developers to test that market before a decision is made on whether part of any particular site should be developed for serviced plots. Further guidance on how the Council will seek comply with government requirements relating to serviced plots will be included as necessary in our supplementary planning document Camden Planning Guidance on housing. Depending on the level of interest shown by registrations for self-build and custom-build and the extent of land available, the Council may also consider applying for exemption from elements of the Housing and Planning Act relating to serviced plots.

## Large and small homes

- 3.183 Policy H7 seeks a mix of dwelling sizes where the following types of housing are proposed:
- self-contained houses and flats (Use Class C3);
  - houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (small houses in multiple occupation or HMOs, Use Class C4); and
  - live/ work units, which are self-contained homes that include a dedicated work area (not in any planning use class, we will treat them as Use Class C3 when we apply Local Plan policies).
- 3.184 Policy H7 applies wherever there is development that affects the mix of dwelling sizes for these housing types, whether the development involves construction of new buildings, extensions, alterations, conversions or changes of use, or includes the creation of separate homes from ancillary residential accommodation. Other policies in this section provide more specific provisions relating to particular types of housing as follows:
- housing designated for occupation by older people, homeless people or vulnerable people – see Policy H8; and
  - housing that is generally restricted to occupation by students during term-time - see Policy H9.
- 3.185 Large and small homes are defined as follows:
- large homes are homes with 3 bedrooms or more; and
  - small homes are studio flats, 1-bedroom and 2-bedroom homes.
- (note – evidence on the need for homes of different sizes generally does not distinguish between studio and one-bedroom homes).