

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

26th January 2004

Dear Sir/Madam,

Draft Supplementary Planning Guidance: Affordable Housing and Housing in Mixed Use Development

Thank you for giving the House Builders Federation (HBF) the opportunity to comment on your Draft Supplementary Planning Guidance for Affordable Housing and Housing in Mixed Use Development within the London Borough of Camden. The HBF have considered the proposed document and have made the following observations:

We accept that UDP Alteration No. 2 refers to a target of 50% affordable housing and that as a broad guide the affordable housing should preferably be proportioned as 70% Social Rented accommodation and 30% Intermediate. The SPG, however, is far more rigid in its approach to affordable housing provision, for example Para 3.3.42 states the Council seeks 50% of housing provided as affordable and 70% of that as Social rented.

The SPG must be altered to emphasise that these figures are benchmarks rather than specific targets and that individual site circumstances will dictate the quality and type of affordable housing that can be provided. This flexibility is contained within Para 3.3.25 whereby negotiations will take place to reach an affordable housing provision that requires less subsidy where sufficient public subsidy is not available. It is not clear what financial information the Council consider developers must provide. This requires additional clarity. An 'open-book' accounting policy is not supported, as regards, commercially sensitive information.

Para 6.46 of Camden UDP Alteration No. 2 refers to negotiating provision of affordable housing to reflect the economics of provision e.g. Government funding. This should be incorporated into the text i.e. level and type of provision must reflect economics to allow for a viable development.

Paragraph 3.3.10 states that accommodation designated for students may be exempted from making a contribution to Social Rented and Immediate Housing.

The Draft London Plan - Examination In Public Panel Report from July 2003 states in Paragraph 4.4.1 that ***“purpose built student accommodation should be regarded as contributing to meeting an affordable housing requirement.”*** It is requested that the text is changed to reflect this.

Paragraph 3.3.14 proposes the use of Floorspace as a threshold for affordable housing. This contradicts Policy HG11 of the UDP and Circular 6/98 which both state that the threshold should be on housing developments of 15 or more dwellings or residential developments on sites of 0.5ha or more, irrespective of the number of dwellings.

As a consequence, the HBF question the Draft SPG’s consistency with national planning guidance, particularly PPG 12 Development Plans. The SPG seeks to modify Policy HG11 by adopting Floorspace as a measure of threshold. Such modifications clearly go beyond the remit of the SPG and show complete disregard for PPG 12, which makes it clear that that SPG must be consistent with policies in the adopted plan. SPG is intended to supplement local plan policies, not to amend them or even review them. There is a formal process for the alteration to plan policies, which is given in Chapter 2 of PPG 12.

Paragraph 3.3.15 refers to the provision of service charges in new developments. It is felt that this is not a planning matter and should not be addressed by the SPG.

The HBF object to the detail of Para 3.3.30. Circular 6/98 Para 17 is clear that the Council must not prescribe preferred partners to deliver affordable housing. The fact that the Council may have nomination agreements with Housing Associations in the Joint Commissioning Partnership, as detailed in Para 3.3.31 is irrelevant to this SPG. This is not a relevant planning matter and should be deleted accordingly.

Paragraph 3.3.35 states that 50% Social Rented Housing should have 3 or more bedrooms and 30% should have 2 bedrooms. This approach is far too prescriptive and fails to have regard to the form of the development. Para 3.3.35 acknowledges the constraints on affordable housing provision this approach will incur. Additionally, this is not outlined in Policy HG16 or the supporting text of the Adopted UDP regarding housing mix in new residential schemes. Again it can be argued that the SPG is attempting to modify Policy HG16, which goes beyond the remit of SPG and shows disregard to PPG 12.

The HBF object to the detail of Para 3.3.40. Excessive affordable housing requirements cannot be justified on the basis that this will reduce measures to provide affordable housing off-site. The benchmark of 50% gross new floorspace should be applied consistently. There may be a number of legitimate practical reasons why residential floorspace cannot be provided within the development. This does not justify additional affordable housing demands.

Thank you again for giving the HBF opportunity to comment on the Draft Supplementary Planning Guidance in Camden. I look forward to acknowledgement of this letter and further involvement in the plan preparation process.

Yours sincerely,

Jonathan Sheldon
Assistant Planner