

Dear Camden Planning

Further to the correspondence objecting to the current application for planning permission to develop the Mansfield Bowling Club site into a luxury 98 bed care home, the council will now be aware of the “Open Consultation; Proposed reforms to the National Planning Policy Framework and other changes to the planning system”(“NPPFC”) published on 2 August 2024.

The government has made clear its determination to prioritise the use of land for the development of housing - specifically self-contained and affordable housing units.

In 2016, the MBC site was granted planning permission for the development of self-contained housing. Since then the site was bought by the current developer, paying many millions of pounds, and then claiming that the site could not be developed in that way. The luxury care home was proposed in place of a housing scheme.

Objections have been raised questioning the need for a luxury care home in Camden, particularly given that the proposal is for the rooms in the care home to be positioned in the market at prices likely to be unaffordable to most elderly people for any significant period of time.

The council must now consider this proposal as against the government’s stated policy to prioritise the use of land for individual housing units after the final NPPF policy has been published.

In particular

- The NPPFC forcefully argues for more demanding requirements on Councils to demonstrate a 5-year land supply for housing at all times so as to urgently address the chronic undersupply of such land (Chap 3, para 15)
- The NPPFC proposes the re-establishment of the requirement on councils to continually demonstrate a 5-year plan for delivering sites for housing (Chapter 3 paras 18-29)
- The NPPFC is very clear in formulating the government’s policy to build at least 1.5m new homes (not rooms in care homes) with an emphasis of breaking the downward cycle in home building by preventing developers using prime housing sites for other uses.
- These proposals should be read with Camden’s Housing Delivery Test firmly in mind. The most recent data, “Housing Delivery Test 2022” (published 19 December 2023) shows Camden currently failing to deliver on the number of homes required (a score of 69%; delivery against target)
- C3 housing is the priority use for land. Indeed, resonating with the NPPFC, the Camden Policy “H1 maximising housing supply” places self-contained housing as a priority and resisting alternative development of sites (of which MBC is plainly one) (ref H1 a and c)
- This New Draft Camden Local Plan (Reg 18 consultation version Jan 2024) specifically seeks provision of self-contained (C3) housing in preference to other development of land unless it can be shown that the site cannot be so developed.

The change of use of the site from the 2016 planning permission for self-contained housing to the current proposal of a luxury care home has not been justified. The need to use this land for a care home cannot be maintained on the basis that the developer paid an exorbitant price for the site and

must now recover their outlay and make a commercial gain. Indeed, many similar sites to MBC in Camden have been developed for self-contained housing (to include affordable housing) in line with NPPF and Camden's current Housing policy. The proposed development will take land previously earmarked (by planning consent) for housing, so significantly depleting the supply of such housing for the council and government policies.

It would be wrong for Camden to proceed to make a decision before the final NPPF has been published and before objectors have been given time to make representations on the development in the light of the new government and council housing policy. Camden should then apply the government's clear intention and prioritise the development of the MBC site to ensure it meets the government and Camden targets to provide C3 housing and affordable units.

On Behalf of residents of Laurier Road NW5.