

- 3.5 This section of the Plan relates to all forms of housing where people live long-term, including:
- self-contained houses and flats (as defined in paragraph 3.6 on page 41);
  - live/ work units (homes with a dedicated work area) – we will treat them as self-contained homes for the purposes of Local Plan policy;
  - houses, flats, hostels and student halls shared by multiple occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities;
  - nursing homes, care homes and parts of hospitals where people live long-term, such as nurses' accommodation;
  - plots provided to people wishing to build their own homes;
  - accommodation for Camden's established traveller community; and
  - residential accommodation that is ancillary to another use, such as a living area attached to a business and used by caretakers or other staff.
- 3.6 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, however the Council will also regard the following as self-contained homes when applying Local Plan policies and monitoring housing delivery:
- self-contained homes provided in conjunction with another use, notably live/ work units (homes with a dedicated work area), which are usually considered to be sui generis (in a class of their own); and
  - small houses in multiple occupation (Use Class C4), which can change to Use Class C3 without a planning application under the freedom provided in legislation. Where the freedom to change to Use Class C3 has been removed (e.g. by a planning condition), the Council will regard small houses in multiple occupation as non self-contained housing.
- 3.7 Accommodation where people stay for short periods is covered elsewhere in the Plan. Specifically:
- hospitals and care facilities where patients and staff are only present on a temporary or working-hours basis are covered by "Policy C2 Community facilities"; and
  - hotels, serviced apartments and hostels aimed at tourists and backpackers are covered by "Policy E3 Tourism".

## Policy H1 Maximising housing supply

The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.

We will seek to exceed the target for additional homes, particularly self-contained homes by:

- a. regarding self-contained housing as the priority land-use of the Local Plan;

- b. working to return vacant homes to use and ensure that new homes are occupied;
- c. resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for housing; and
- d. where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.

We will monitor the delivery of additional housing against the housing target, and will seek to maintain supply at the rate necessary to exceed the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or capital value of different house types and tenures, and the needs of different groups.

### **Camden's housing needs and targets**

- 3.8 The National Planning Policy Framework (NPPF) requires the Council to plan to meet the full objectively assessed needs for housing in the area. The London Boroughs of Camden and Islington have been identified as a lower tier housing market area for the purposes of satisfying the NPPF requirements, and the two authorities have jointly commissioned an assessment of housing needs (Strategic Housing Market Assessment or SHMA). The assessment shows that Camden's full objectively assessed housing need for 2016-2031 is 16,800 additional homes, or 1,120 homes per year. This overall need includes the homes needed to meet the needs of different groups within the community, including families with children and people with disabilities.
- 3.9 The Council produces an Authority Monitoring Report (AMR) each year which separately monitors the overall delivery of additional homes and different types of homes each year (self-contained homes, student housing, other non-self-contained homes and long-term vacant homes returned to use). The AMR also contains a housing trajectory which shows how we will continue to deliver self-contained homes and non-self-contained homes and measures Camden's anticipated performance against targets. The Council has produced a new housing trajectory to show how the Plan will meet the full objectively assessed housing need, and this is included in the Local Plan as Appendix 2. In accordance with the NPPF, the trajectory adds a 5% buffer to housing targets during the first five years, which is moved forward from later years. The trajectory therefore adopts an annual target of 1,176 additional homes for the period 2016/17 to 2020/21, and an annual target of 1,092 for the period 2021/22 to 2030/31.
- 3.10 The housing trajectory indicates that there are sufficient identified sites in place to provide just over 17,100 additional homes from 2016/17 to 2030/31 and exceed our housing targets throughout the Plan period. Deliverable sites are in place to provide more than 7,100 homes from 2016/17 to 2020/21, approximately 1,420 additional homes per year, comfortably exceeding the target of 1,176 per year (deliverable sites are sites that are suitably located, viable and available to develop now, and that have a realistic prospect of

delivery within five years). Over the first 10 years of the Plan period, the trajectory indicates that developable sites have been identified to deliver an average of around 1,150 additional homes per year, and over the entire plan period identified sites should deliver just under 1,140 additional homes per year (developable sites are sites that are suitably located and have a reasonable prospect of being viable and available to develop at the time envisaged).

- 3.11 We will update the housing trajectory regularly to take into account new sources of supply and maintain a five-year supply of deliverable sites together with a 5% buffer, and will publish the updated trajectory in future Authority Monitoring Reports.

### **Conformity with the London Plan**

- 3.12 The London Plan 2015 estimates the need for additional homes across London as at least 49,000 per year, calculated on the basis of household projections from 2011 to 2035 together with existing housing needs and further needs arising from undersupply of housing from 2011 to 2015. Based on the supply of land across London and its capacity to deliver additional homes, the London Plan also sets out a minimum target of 42,000 additional homes per year across London up to 2025, and minimum monitoring targets for each borough.
- 3.13 The minimum London Plan monitoring target for Camden is 8,892 additional homes from 2015-2025, or 889 per annum. Boroughs are advised that they should seek to achieve and exceed the minimum target, and set higher Local Plan targets to close the gap between London's housing need and capacity in line with the NPPF. Camden's target of 1,120 additional homes per year is therefore in conformity with the London Plan requirements for housing targets.
- 3.14 The London Plan disaggregates the overall monitoring target into housing supply arising from development ('conventional supply') and increases in housing supply arising from vacant homes returning to use. Targets for vacant homes returning to use are based on the number that would need to return to use each year over a 10-year period to reduce the proportion of the long-term vacant homes to 0.75% of total stock. For Camden the target is 32 homes per year, or 480 homes in total extended across the Local Plan period, and the Council will use this 15-year target for the purposes of monitoring the Local Plan.

### **Maximising housing supply**

- 3.15 As noted in paragraph 3.12, the London Plan 2015 indicates that the number of additional homes needed across London exceeds the identified capacity for additional homes by at least 7,000 per year. The London Plan also indicates that on the basis of short-term trends, the capital's need for housing could be as high as 62,000 homes per year, 20,000 more than the identified capacity. Consequently, there is a need for all London boroughs to maximise housing delivery.
- 3.16 Similarly, the London Plan sets a minimum monitoring target for Camden of 889 additional homes per annum based on capacity, over 200 homes short of Camden's full objectively assessed need. As indicated in paragraphs 3.10 and 3.11, the Council considers that additional capacity is available in the borough to meet the assessed need. However, meeting needs in Camden will still be

challenging. Analysing short-term trends rather than long-term trends, the GLA has projected a potential increase in the number of Camden households by as many as 1,270 each year, compared with our target of 1,120 additional homes per year. To meet Camden's housing needs as far as possible the Council will therefore seek to ensure that all available sites deliver as much additional housing as possible.

### **The target and priority for self-contained homes**

- 3.17 The 2011 Census indicated that Camden has over 220,000 usual residents. Of these, almost 8,000 live in communal establishments, and just under 5,400 live as separate households in shared dwellings. Over 90% of Camden's usual residents live in self-contained homes as part of a household or as single person households (self-contained houses and flats are defined in paragraph 3.6 of the Local Plan). Usual residents of self-contained homes include 40,000 people living in multi-adult households such as groups of friends and flat-shares (18% of all usual residents). In many cases these residents are not related to the other occupiers of their home, so although they currently live in self-contained homes they could potentially live in non self-contained housing in the future.
- 3.18 Self-contained homes have the greatest potential to provide for a variety of household types with a reasonable standard of privacy and amenity. They generally have the space and flexibility to provide for people whether they are young or old, single people (often sharing), couples or families, and disabled people or people who need a carer for certain activities or overnight. Non self-contained housing with shared facilities is generally aimed at a particular group or household type (e.g. students or single people). This accommodation can be the best way of tailoring facilities or support to suit the characteristics of a particular group, but provide less flexibility for alternative occupiers and can create a greater risk of conflict between people with different cultures and lifestyles.
- 3.19 The London Plan does not disaggregate housing monitoring targets into self-contained homes and non self-contained housing. However, the targets were based on the London Strategic Housing Land Availability Assessment (SHLAA) 2013, which derived borough targets from separate assessments of capacity for the two housing types. Capacity for self-contained homes was based on the assessed capacity of potential sites across London measuring 0.25 ha or more along with local plan allocations, the pipeline of developments of self-contained housing with planning permission, and past rate of delivery from sites of under 0.25 ha.
- 3.20 The London SHLAA assessed Camden's capacity for additional self-contained homes from 2015-2025 as 3,935 homes from sites of 0.25 ha or over and 3,489 from smaller sites, or 7,424 in total. We have converted this assessment of capacity into a specific target for self-contained homes in Camden, which will be used for the purposes of monitoring the Local Plan. Camden's annualised target for additional self-contained homes is 742 homes per year, extrapolated to 11,130 homes over the 15-year Local Plan period.
- 3.21 Camden and other parts of Central London have experienced large growth in student numbers in recent years, accompanied by pressure for substantial increases in the amount of purpose-built student housing. The 2011 Census

indicated that over 25,000 full-time students aged 18 or over were resident in Camden during term- time, or 11.4% of the usual resident population, compared with approximately 17,400 in 2001 (or 8.8% of residents). On the basis of development from 1999-2012, the London Plan states that 57% of additional student housing has been concentrated in the four Central London boroughs of Islington, Tower Hamlets, Southwark and Camden.

3.22 Student housing has become an increasingly popular development option as an alternative to self-contained housing because student housing has benefited from increasing rents, low vacancy rates and the absence of any conventional affordable housing requirements. Given these concerns we have specifically identified self-contained housing and the Plan's priority land-use (self-contained houses and flats are defined in paragraph 3.6 on page 41). In Camden, 1,200 additional student bedrooms were completed in 2013/14 alone (compared with close to 400 additional self-contained homes). Concerns have emerged across Central London that development of self-contained homes could be severely squeezed by proposals for new student housing. The London Plan therefore advises that Local Plans should address student housing requirements without compromising capacity for conventional homes, and encourages a more dispersed distribution of future provision.

3.23 Given these concerns we have specifically identified self-contained housing as the Plan's priority land-use. We have set out a minimum target for student housing in "Policy H9 Student housing", but we will also seek to ensure that there is sufficient land available to meet Camden's need for additional self-contained homes. The existing stock of self-contained homes in Camden includes many different types of homes in several tenures, and similarly the Plan's priority land-use encompasses self-contained homes from the affordable, owner-occupied and private rented sectors.

#### **Ensuring homes are occupied**

3.24 In October 2013, almost 1,300 homes in Camden had been vacant for 6-months or more, approximately 1.3% of the borough's housing stock, compared with 0.6% across London. An element of vacancy in the housing stock is inevitable, reflecting homes in the process of renovation or changing hands. The 2013 London Strategic Housing Land Availability Assessment has derived The London Plan targets on the basis that the long-term vacancy rate should not exceed 0.75% of the housing stock.

3.25 The London Plan sets a monitoring target for 32 long-term vacant homes in Camden to return to use each year. Given the pressure on the housing stock, returning vacant homes to use is a high priority, and the Council will seek to exceed the London Plan monitoring target. The Council currently discourages long-term vacancies by charging the maximum rate of 150% Council Tax on homes vacant for 2 years or more. We also employ empty property officers to work with owners, ensuring homes are in a suitable condition for occupation and matching them up with tenants. The Council will seek to apply Local Plan policies flexibly where this is appropriate to enable refurbishment of a property that would otherwise remain vacant.

3.26 There is some evidence that an increasing proportion of homes in and around Central London are bought by investors who do not live in them or rent them

out. The Mayor is seeking to address this by encouraging developers to sign up to his New Homes for Londoners Concordat which commits them to making homes in their developments available for sale to Londoners before, or at the same time as they are available to buyers from other countries. The Council will explore using legal agreements to ensure that homes are marketed and available for sale in Camden for at least two months before they are marketed more widely. The Council will also explore further ways to ensure that investment homes are made available for occupation, for example by encouraging new owners to use our pilot local letting agency Camden Homes. More details of measures to encourage occupation and discourage vacancy will be included in supplementary planning document Camden Planning Guidance on Housing where appropriate.

### **Resisting alternative development of identified housing sites**

- 3.27 Where possible, we have identified underused sites that are suitable for additional self-contained housing or another form of housing in our development plan, and will resist an alternative use of allocated sites. However, a high proportion of the housing developments that come forward in Camden are not identified in advance because they are small sites, or were in use when sites were assessed for allocation. Given the high proportion of potential housing sites in the borough that cannot be identified in a development plan document, the Council may also resist alternative development of other sites that have an existing consent for self-contained housing or another form of housing (an existing consent is one that has not expired, or remains effective because development has been started).
- 3.28 If alternative development is proposed on a site identified for self-contained housing, we will consider whether there a reasonable prospect of a viable development for self-contained housing coming forward within the Plan period, and any other relevant material considerations such as whether the alternative development will free up a replacement site in Camden for self-contained housing, or provide an essential community facility or infrastructure that cannot be accommodated elsewhere.
- 3.29 The Council will generally treat live / work units in the same way as housing for the operation of development policies. Such premises contribute to the range of homes and the range of business premises in the borough, and the Council will not resist the development of live - work premises on sites that are considered suitable for housing provided that they include an appropriate mix of dwelling-sizes and types in accordance with other policies including H4 and H7. Further information on our approach to live-work premises is provided in the section of the Plan dealing with the economy and jobs.

### **Making the best use of sites to deliver housing**

- 3.30 Where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for



housing unless:

- the Plan seeks to protect existing uses on site, such as business premises, community uses and shops;
- the site is needed to meet other plan priorities for the area, particularly in the Hatton Garden area and other parts of Central London;
- the site is identified for another use in our development plan documents; or
- it is demonstrated to the satisfaction of the Council that a housing development would not be financially viable.

- 3.31 Where non-residential uses are required on the site, the Council will seek mixed-use schemes including the maximum appropriate provision of housing. More details of our approach to the inclusion of housing in mixed-use developments are set out in “Policy H2 Maximising the supply of self-contained housing from mixed-use schemes”.
- 3.32 The London Plan’s Sustainable Residential Quality density matrix has been developed as a tool to help boroughs seek the maximum appropriate provision of housing on each site while maintaining residential quality, taking account of public transport accessibility, respecting local context and ensuring an appropriate mix of homes of different sizes. To ensure we make the best use of sites for housing, we use the London Plan’s density matrix (London Plan Table 3.2) to seek the maximum housing density appropriate to the site (i.e. the most homes or rooms that can appropriately be delivered in a given site area).
- 3.33 Given that the majority of the borough has relatively high public transport accessibility and is suitable for development of flats, densities should be towards the higher end of the appropriate density range, and should generally fall within the cells towards the right and bottom of the matrix, i.e. 45 to 405 dwellings per hectare. This broad range is designed to encompass areas with widely different characters, including low rise terraces, mansion blocks and mixed commercial areas with building heights of four-storeys or more. Where the top end of the range applies a plot can provide nine times as many homes as an equivalent plot where the bottom end of the range applies.
- 3.34 The density matrix should be seen as a guide rather than a prescriptive tool, and will be applied flexibly taking into account all aspects of local character including heritage assets, protected views and open spaces, whilst also having regard to the borough’s acute housing needs. To respect local character we will expect developers to explore whether increased density can best be achieved through the use of medium rise development and traditional urban forms rather than focussing only on high rise options. We will also recognise that it may be appropriate to exceed or fall below the relevant density range on certain sites where this is justified by context and form of the development.
- 3.35 When using the London Plan density matrix, the Council will refer primarily to dwelling densities, measured in units per hectare. The London Plan density matrix assumes that the number of habitable rooms per dwelling will average between 2.7 and 4.6. However, there is a significant market in Camden for very large homes that have many more rooms than occupiers. Developments including dwellings with significantly more than 5 habitable rooms may give inconsistent results against the density matrix, showing an appropriate density in terms of habitable rooms, but an inappropriately low density in terms of dwellings. Assessing density in terms of units per hectare will help the Council

to seek a range of dwelling sizes that supports mixed and inclusive communities and help us to avoid concentrations of very large homes.

### **Flexible implementation**

- 3.36 Despite the financial crisis of 2007-08, house prices in Camden had recovered to 2007 levels by mid-2010 and have continued to rise. The Council is currently receiving applications for a high level of residential development, with permission granted in 2013-14 for over 850 additional self-contained homes. This suggests that developers expect continued increases in Camden's house prices.
- 3.37 However, the viability of housing development has not fully recovered from the financial crisis. Some sites are constrained by acquisition prices that could not now be supported, lending to developers and to purchasers is more restricted than previously, lenders are less willing to take risks and both lenders and developers expect financial viability assessments to indicate higher profit levels than previously. There is also uncertainty about the future, with expectations that interest rates will rise, concerns about the impact of a rate rise on borrowers, and concerns that current economic growth is fuelled by unsustainable debt.
- 3.38 Given these uncertainties, there is a need to monitor the supply of housing very closely, and make adjustments to the way we implement our Local Plan policies to ensure that our targets for additional homes are met. If overall housing supply appears to be threatened by economic conditions, there are a number of areas of flexibility in the Council's policy approach that will enable us to tailor our objectives to the particular circumstances of each proposal with a view to maximising delivery. These include:
- varying the proportion of market and affordable housing;
  - varying the split between social-affordable rented housing and intermediate affordable housing;
  - positively considering different forms of intermediate affordable housing to take advantage of the funding and credit that is available;
  - varying the range of home sizes sought, particularly amongst market housing; and
  - reviewing the range of Section 106 requirements sought to maintain viability.
- 3.39 In negotiating the range of housing types and sizes on individual sites, including the proportion and range of affordable housing, the Council will have regard to the characteristics and constraints of the site and the area, progress towards meeting Camden's overall housing target, the financial viability of the development, the contribution the development makes to the creation of mixed communities, and the Council's other Local Plan objectives.
- 3.40 In seeking to secure the future supply of additional housing, we will work in partnership with many other organisations and agencies involved in the development and funding of housing and affordable housing. These will include our developers, landowners and private landlords, Housing Associations and other affordable housing providers, the Mayor and the GLA and other local authorities – particularly councils in Central and North London, government departments and government agencies.



## Maximising the supply of self-contained housing from mixed use schemes

- 3.41 Policy H2 applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase. Policy H2 also applies to all non-residential uses, including hotels and other visitor accommodation and non-residential institutions. However, a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought.
- 3.42 Policy H2 specifically seeks provision of self-contained houses and flats (Use Class C3), rather than other forms of housing, in line with the priority land-use of the Plan as set out in “Policy H1 Maximising housing supply”.

### Policy H2 Maximising the supply of self-contained housing from mixed-use schemes

To support the aims of Policy H1, where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses.

- In all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development.
- In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations.

In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:

- a. the character of the development, the site and the area;
- b. site size, and any constraints on developing the site for a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. whether the development is publicly funded or serves a public purpose.

Where housing is required as part of a mix of uses, we will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

## Protecting existing homes

- 3.66 Policy H3 seeks to protect all housing floorspace where people live long-term. It also seeks to protect individual self-contained houses and flats (in Use Class C3) and individual houses and flats shared by 3-6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, Use Class C4).
- 3.67 Other policies in this section also provide more specific provisions protecting particular types of housing as follows:
- affordable housing floorspace is protected by Policy H5;
  - housing for older people, homeless people and vulnerable people is protected by Policy H8;
  - student housing is protected by Policy H9; and
  - other housing where occupiers do not live as a family but are long-term residents sharing some rooms and/ or facilities (such as bedsits) is protected by Policy H10.

### Policy H3 Protecting existing homes

The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by:

- a. resisting development that would involve a net loss of residential floorspace, including any residential floorspace provided;
  - within hostels or other housing with shared facilities; or
  - as an ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use;
- b. protecting housing from permanent conversion to short-stay accommodation intended for occupation for periods of less than 90 days; and
- c. resisting development that would involve the net loss of two or more homes (from individual or cumulative proposals), unless they:
  - create large homes in a part of the borough with a relatively low proportion of large dwellings;
  - enable existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed; or
  - enable sub-standard units to be enlarged to meet residential space standards.

Exceptionally, the Council may support development that involves a limited loss of residential floorspace where this provides for the expansion of existing health premises to meet local needs.

### Loss of residential floorspace

- 3.68 As indicated in the paragraphs accompanying Policy H1, meeting housing needs in Camden and across London will be challenging. To tackle Camden's

housing needs, the Council aims to maximise the supply of additional homes and regards self-contained housing as the priority land-use of the Local Plan. In tandem with these objectives the Council also aims to protect all types of existing housing against development that would involve a net loss of residential floorspace.

- 3.69 The types of housing we aim to protect include:
- residential floorspace that is ancillary to another use (e.g. staff accommodation above a shop or pub) where the proposed change involves development and is subject to planning control; and
  - floorspace at nursing homes, care homes or hospitals where people live long-term such as accommodation for nurses and for patients who are no longer able to live independently (including resident lounges, sleeping areas, bathrooms/ toilets, and associated circulation space).
- 3.70 Proposals we will resist include:
- reductions in floorspace that are material because they reduce the number of residents who can occupy a home or property; and
  - proposals that would involve a permanent change of residential floorspace from long-term accommodation to short-term visitor accommodation let for periods of less than 90 days. In London, the Greater London Council (General Powers) Act 1973 (as amended by the Deregulation Act 2015) provides for Council Tax payers to let their property as visitor accommodation for short periods not exceeding a total of 90 days in any one calendar year, however a permanent change to visitor accommodation is defined as development.
- 3.71 Letting housing to visitors reduces the accommodation available to permanent residents. Visitor lettings can also increase the incidence of noise, sometimes at unsociable hours, and generate high turnover of occupiers that harms community cohesion and increases the fear of crime. The Deregulation Act provides for the Council to seek to exempt particular properties or areas from the provisions that allow visitor lettings where this is necessary to protect the amenity of the locality. The Council will monitor the impact of visitor lettings and consider seeking exemptions if evidence emerges of harm to amenity in particular locations. Householders considering letting out their property are advised to check the terms of their leases, tenancies, insurance and mortgages, as these may contain restrictions that prevent them from letting the property to somebody else.
- 3.72 In some circumstances, where proposals would involve the loss of homes or residential floorspace, it may be appropriate for replacement homes or floorspace to be provided on an alternative site. We will have regard to “Policy H2 Maximising the supply of self-contained housing from mixed-use schemes” (mixed-use development) when considering whether housing should be retained on-site or re-provided off-site.

#### **Net loss of two or more homes**

- 3.73 The starting point for housing targets is the projected growth in the number of households, and the needs of these households can only be met by net additions to housing numbers. Every home that is lost through redevelopment or conversion is a home that needs to be replaced. Since March 2008, approximately 50

dwellings a year have been lost through development involving a net loss of homes. Around 40% were lost in developments involving loss of a single home, many of which combined two flats to create a single dwelling. The Council therefore aims to ensure that existing dwellings will continue to be available to meet housing needs and that the overall supply of housing will not be compromised by developments involving a net loss. Where development involves the demolition or other loss of homes, the Council will generally expect it to provide a similar or greater number of replacement dwellings, to an equivalent or better standard than the homes removed.

- 3.74 However, the Council also recognises that there are situations where the loss of individual homes may be justified. Policy H3 indicates that such losses may be acceptable in the situations set out in the next four paragraphs.
- 3.75 Net loss of one home is acceptable when two dwellings are being combined into a single dwelling. Such developments can help families to deal with overcrowding, to grow without moving home, or to care for an elderly relative. Within a block of flats or apartments, such a change may not constitute development. However, the Council will resist the incremental loss of homes through subsequent applications to combine further homes within the same building or site.
- 3.76 A net loss of homes is acceptable when three or more dwellings are being combined to create an additional large dwelling (3 or more bedrooms) in the following four wards with a low proportion of large dwellings – Bloomsbury, King’s Cross, Holborn and Covent Garden and Kilburn. The 2011 Census shows that the average number of bedrooms per household in these wards is less than 2 (compared with 2.1 across the borough), and less than 25% of households have five or more rooms overall (compared with 31.6% across Camden).
- 3.77 We may permit proposals to combine three or more dwellings to create a large affordable home (3 or more bedrooms). The existing stock of affordable housing (particularly Council housing) is heavily skewed to one and two-bedroom homes. The 2011 Census indicates that over 19.3% of households in social rented housing are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 11.7% across all tenures.
- 3.78 We may permit proposals to combine three or more dwellings where the existing dwellings are 20% or more below residential space standards, provided the loss of dwellings is no greater than needed to meet the standards. Residential space standards are set out in the nationally described space standard and in Table 3.3 of the Minor Alterations to the London Plan 2015.
- 3.79 For the purposes of Policy H3 we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3), and will resist the loss of two or more small houses in multiple occupation. This reflects the freedom provided in legislation for changes between these uses without a planning application.
- 3.80 Our supplementary planning document Camden Planning Guidance on housing provides further information about how we will apply Policy H3.

**Expansion of health premises**

3.81

Many health premises such as GP surgeries are located between or below homes, often in appropriate locations where they are easily accessible to the people that need them. Expansion of these premises to meet changing local needs may not be possible without the loss of some residential floorspace. The Council may therefore support the loss of residential floorspace in these circumstances provided that the need for expansion of the health premises is demonstrated, and the loss of floorspace is no greater than is necessary.

## Maximising the supply of affordable housing

- 3.82 Policy H4 applies primarily to the following types of housing:
- self-contained houses and flats (Use Class C3);
  - 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); and
  - 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).
- 3.83 We will also apply Policy H4 to other types of housing, subject to the provisions of Plan policies relevant to the particular housing type, although the mechanics of considering and securing affordable housing provision may vary having regard to Policy H4 criteria (j) to (p). In particular, we will consider Policy H4 when assessing proposals for:
- houses or flats shared by more than six occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (large houses in multiple occupation or HMOs, outside any planning use class) (see also “Policy H10 Housing with shared facilities (‘houses in multiple occupation’)”); and
  - housing for older people and vulnerable people (potentially in Use Classes C2 or C3, or outside any planning use class) (also see Policy H8).

### Policy H4 Maximising the supply of affordable housing

The Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.

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 100sqm GIA or more. The Council will seek to negotiate the maximum reasonable amount of affordable housing on the following basis:

- a. the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing;
- b. targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home;
- c. targets are applied to additional housing floorspace proposed, not to existing housing floorspace or replacement floorspace;
- d. a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes,



## Managing the impact of development

- 6.1 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.
- 6.2 Policy A1 therefore seeks to ensure that standards of amenity are protected. Other policies within the Plan also contribute towards protecting amenity by setting out our approach to specific issues, such as the impact of food, drink and entertainment uses in "Policy TC4 Town centres uses", "Policy A4 Noise and vibration", and "Policy CC4 Air quality".

### Policy A1 Managing the impact of development

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.

We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- d. require mitigation measures where necessary.

The factors we will consider include:

- e. visual privacy, outlook;
- f. sunlight, daylight and overshadowing;
- g. artificial lighting levels;
- h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
- i. impacts of the construction phase, including the use of Construction Management Plans;
- j. noise and vibration levels;
- k. odour, fumes and dust;
- l. microclimate;
- m. contaminated land; and
- n. impact upon water and wastewater infrastructure.

**Protecting amenity**

- 6.3 Protecting amenity is a key part of successfully managing Camden's growth and ensuring its benefits are properly harnessed. The Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.

**Visual privacy and outlook**

- 6.4 A development's impact upon visual privacy, outlook and disturbance from artificial light can be influenced by its design and layout. These issues can affect the amenity of existing and future occupiers. The Council will expect that these elements are considered at the design stage of a scheme to prevent potential harmful effects of the development on occupiers and neighbours. Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.

**Sunlight, daylight and overshadowing**

- 6.5 Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011). Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.

**Artificial lighting levels**

- 6.6 Camden's dense character means that light pollution can be a bigger problem in the borough than in lower density areas where uses are not so close together. Artificial lighting should only illuminate the intended area and not affect or impact on the amenity of neighbours.
- 6.7 Developments in sensitive areas, such as those adjacent to sites of nature conservation, should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife. For further information please see our supplementary planning document Camden Planning Guidance on amenity.

**Transport impacts**

- 6.8 The Council will consider information received within Transport Assessments, Travel Plans and Delivery and Servicing Management Plans to assess the transport impacts of development. Guidance regarding these documents is available within our supplementary planning document Camden Planning Guidance on transport. In instances where existing or committed capacity cannot meet the additional need generated by the development, we will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts.

- 6.9 Proposals should make appropriate connections to highways and street spaces, in accordance with Camden's road hierarchy, Transport for London's Street Type Framework and to public transport networks. Any development or works affecting the highway will also be expected to avoid disruption to the highway network, particularly emergency vehicle routes and avoid creating a shortfall to existing on-street parking conditions or amendments to Controlled Parking Zones. To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever possible. Major developments dependent upon large goods vehicle deliveries will also be resisted in predominantly residential areas. Further details regarding the movement of goods and materials is available within "Policy T4 Sustainable movement of goods and materials".
- 6.10 Highway safety, with a focus on vulnerable road users should also be considered, including provision of adequate sightlines for vehicles leaving the site. Development should also address the needs of vulnerable or disabled road users.
- 6.11 Highway works connected to development proposals will be undertaken by the Council at the developer's expense. This ensures that highway works, maintenance and materials adopted by the Council are constructed to an appropriate standard. This includes highway works that form part of a planning approval appropriate for adoption, including design and implementation of new routes to be adopted, owned and managed by the relevant Highway Authority. Development requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces. Separate arrangements will apply for any works on roads managed by Transport for London.

### **Construction Management Plans**

- 6.12 Disturbance from development can occur during the construction phase. Measures required to reduce the impact of demolition, excavation and construction works must be outlined in a Construction Management Plan.
- 6.13 Construction Management Plans may be sought for:
- major developments;
  - basement developments;
  - developments involving listed buildings or adjacent to listed buildings;
  - developments that could affect wildlife;
  - developments with poor or limited access on site;
  - developments that are accessed via narrow residential streets;
  - developments in areas with a high number of existing active construction sites; and;
  - developments that could cause significant disturbance due to their location or the anticipated length of the demolition, excavation or construction period.
- 6.14 We will require Construction Management Plans to identify the potential impacts of the construction phase and state how any potential negative impacts will be mitigated.
- 6.15 Whether a Construction Management Plan is required for a particular scheme will be assessed on a case by case basis. Construction Management Plans will

usually be sought for major developments, however there are many instances where smaller schemes can have very significant impacts, particularly within predominantly residential areas.

- 6.16 A Construction Management Plan will usually be secured via planning obligations between the developer and the Council after an application is approved. We will expect developers to sign up to the Considerate Constructors Scheme and follow guidance within Camden's Considerate Contractors Manual. Financial contributions and monitoring fees may also be sought if necessary.
- 6.17 The level of detail contained within a Construction Management Plan should be proportionate to the scale and/or complexity of the development. To assist developers in providing the right information, the Council has created a Construction Management Plan Pro-forma which is tailored towards the specific needs of the borough. The criterion in the Pro-forma are drawn from relevant aspects of Transport for London's (TfL) Construction Logistics Plans and follows TfL's construction safety best practice guidelines. Construction Logistics and Cyclist Safety scheme (CLOCS) standards and Camden's Minimum Requirements for Building Construction also form the basis for the Pro-forma criterion. The Pro-forma is available on the Council's website.
- 6.18 The Council seeks to minimise the movement of goods and materials by road through the use of consolidation facilities and rail and water freight where possible. Please see "Policy T4 Sustainable movement of goods and materials" on the movement of goods and materials for further detail. For further details regarding Construction Management Plans please refer to our supplementary planning documents Camden Planning Guidance on amenity and Camden Planning Guidance on planning obligations.

#### **Noise and vibration**

- 6.19 Noise and vibration can have a major effect on amenity. The World Health Organisation (WHO) for example states that excessive noise can seriously harm human health, disturb sleep and have cardiovascular and behavioural effects. Camden's high density and mixed-use nature means that disturbance from noise and vibration is a particularly important issue in the borough.
- 6.20 Where uses sensitive to noise are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application. Further detail can be found in "Policy A4 Noise and vibration" and our supplementary planning document Camden Planning Guidance on amenity.

#### **Odours, fumes and dust**

- 6.21 Odours, fumes and dust can be generated from commercial cooking, industrial process and construction and demolition which have the potential to cause a range of health problems, including respiratory diseases.
- 6.22 We will require all development likely to generate nuisance odours to install appropriate extraction equipment and other mitigation measures. These should be incorporated within the building where possible. External extraction equipment and ducting should be sited sensitively, particularly on listed buildings and within conservation areas. Further details can be found in our

supplementary planning documents Camden Planning Guidance on design and Camden Planning Guidance on amenity.

- 6.23 The Council will limit the disturbance from dust due to construction and demolition by expecting developers and their contractors to follow the Greater London Authority and London Councils' Best Practice Guidance: The control of dust and emissions from construction and demolition. Details of how these measures will be implemented should be provided in a Construction Management Plan. Further information regarding the management of dust can be found within "Policy CC4 Air quality".

### **Microclimate**

- 6.24 Large developments can alter the local climate. Buildings can affect the flow of air and cause wind tunnels which can potentially affect the enjoyment of public spaces. A building's colour can affect how much heat it absorbs and therefore impact upon local air temperatures. Developments should therefore consider local topography and the local microclimate in their design. Developments large enough to alter the local climate will be required to submit a statement demonstrating how the design has considered local conditions. Further detail can be found in our supplementary planning documents Camden Planning Guidance on sustainability and Camden Planning Guidance on amenity.

### **Contaminated Land**

- 6.25 Development on contaminated land can expose people to a wide range of potential health risks. Examples of sites that may have contaminated land include those that have been used for vehicle repair, industrial processes and petrol stations. The Council will expect proposals for the redevelopment of sites that are known to be contaminated, have the potential to be contaminated, or are located in close proximity to such sites to submit relevant assessments and take appropriate remedial action to the Council's satisfaction if required. Remedial action is particularly important in developments where people will have access to the ground for gardening, play or planting food for consumption. Please refer to our Contaminated Land team and our supplementary planning document Camden Planning Guidance on amenity for further information.

### **Water and wastewater infrastructure**

- 6.26 The Council will work with water providers to ensure that there is adequate water and wastewater infrastructure serving developments likely to put pressure on existing water infrastructure. Developers may be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to reductions in water pressure, sewer flooding or overloading of existing water and wastewater infrastructure. Where there is a infrastructure capacity constraint and no improvements are programmed by the water provider, we will use planning conditions and/or obligations requiring developers to provide secure mitigation and compensatory measures which must be completed prior to occupation of the development. Further information regarding flood risk, drainage and water supply can be found within "Policy CC3 Water and flooding" and further detail regarding obligations can be found within our supplementary planning document Camden Planning

Guidance on planning obligations.