



Section 2

Meeting Camden's needs

– Providing homes, jobs and facilities

- 2.1 The section on Meeting Camden's needs in Camden's Core Strategy provides our overall approach to making sure we provide the homes, jobs, facilities and infrastructure needed to support the growth in the number of people living in, working in and visiting the borough. This section of Camden Development Policies sets out our detailed planning policies to help to implement this part of the Core Strategy. It is divided into three parts:
- **Meeting our need for homes** – this provides policies that seek to maximise overall housing supply, provide affordable housing and prevent the loss of housing. It also covers providing homes of different sizes; lifetime and wheelchair homes; sheltered housing and care homes for older people; accommodation for homeless people and vulnerable people; hostels and other housing with shared facilities.
 - **Providing jobs and facilities** – this contains our policies on small and independent shops, markets, managing the impact of town centre uses, employment sites and premises, tourism and visitor accommodation, and community and leisure uses.
 - **Promoting sustainable and efficient transport** – this sets out our detailed policies on transport, in particular on the transport implications of development; walking, cycling and public transport; parking; the movement of goods; and development that connects to the highway network.



Meeting our need for homes

- 2.2 The Core Strategy seeks to manage growth so that it works positively for Camden. Core Strategy policy CS6 – *Providing quality homes* aims to:
- make full use of Camden’s capacity for housing, to meet or exceed targets for the supply of homes in the borough;
 - secure high quality affordable housing, by seeking an appropriate proportion of, and different types of, affordable homes; regenerating Camden’s housing estates; and bringing existing Council homes up to Decent Homes standard;
 - minimise social polarisation and secure mixed and inclusive communities, by securing a broad range of housing of different sizes and types to meet the needs of different groups and households in different circumstances.
- 2.3 This sub-section of Camden Development Policies sets out in more detail how we will make planning decisions to deliver the aims of policy CS6. However, housing schemes will also need to satisfy other relevant policies, particularly those concerned with the environment, quality of life, sustainability, climate change and transport. These policy concerns correspond well with the Building for Life criteria that form the national standard for well-designed homes and neighbourhoods.
- 2.4 Amenity, in terms of a house’s relationship with neighbouring properties and its internal space standards, is key aspect of housing quality. The Council will protect the amenity of Camden’s residents by making sure that the impact of developments on their occupiers and neighbours is fully considered, in accordance with development policy DP26 and Core Strategy policy CS5. Further information regarding factors that affect residential amenity is included in our Camden Planning Guidance supplementary planning document. In particular, Camden Planning Guidance contains our internal space standards for residential development. To provide high quality housing, proposals will need to address all aspects of residential amenity in accordance with relevant policies and Camden Planning Guidance.
- 2.5 The policies in this sub-section relate to the same forms of housing as Core Strategy policy CS6, namely:
- self-contained houses and flats (Use Class C3) (the predominant form);
 - live/work units, which are self-contained homes that include a dedicated work area (they are outside any planning use class, but we will treat them in the same way as Use Class C3 for the operation of our Local Development Framework policies);
 - bedsit rooms that share facilities such as toilets, bathrooms and kitchens (often known as houses in multiple occupation or HMOs, some with 3 to 6 occupiers fall within Use Class C4, but most are outside any planning use class);
 - hostels where shared accommodation is managed for a particular group of people (e.g. students) and occupiers may stay for several months (also outside any planning use class);
 - those nursing homes, care homes and parts of hospitals where people live permanently, such as nurses’ accommodation (parts of Use Class C2);
 - residential accommodation that is ancillary to another use, such as living areas for managers, caretakers and other staff.

DP2. Making full use of Camden’s capacity for housing

- 2.6 Core Strategy policy CS6 indicates that the Council seeks to maximise the supply of homes and minimise their loss, with housing regarded as the priority land-use of the Camden Local Development Framework. Key aspects of policy CS6 that inform our approach to maximising housing supply and minimising loss of homes in the case of an individual site include:
- the overall Camden target for supply of additional homes from 2010/11 to 2024/25;
 - the separate elements of the target for self-contained homes, homes that are not self-contained (such as hostels and grouped bedsit rooms) and vacant homes returning to use;
 - the overall expected delivery of additional homes based on Camden’s 15-year housing trajectory, which is significantly above the housing target for 2010/11 to 2024/25, but falls significantly short of the projected household growth rate up to 2026; and
 - the Council’s aim to give priority to households unable to access market housing and to vulnerable people in planning decisions relating to new homes.
- 2.7 Policy DP2 protects housing against development for a non-residential use. It relates to all forms of housing for long-term residents (see paragraph 2.5). The first part of the policy is concerned with making the best use of sites for additional homes, particularly homes for people who are unable to access general needs market housing. This part relates primarily to self-contained houses and flats (Use Class C3). The second part is concerned with the loss of housing floorspace in all forms; proposals to change permanent housing into short-stay accommodation; and with the loss of self-contained homes through proposals to combine them into larger dwellings. More detailed guidance is given in policies DP7, DP8 and DP9 with respect to the loss of sheltered housing and care homes for older people; loss of housing for vulnerable people and homeless people; and loss of student housing, bedsits, and other housing with shared facilities. Through policy DP4, the Council seeks to protect existing affordable housing, whether or not it is self contained.



DP POLICY

DP2 – Making full use of Camden’s capacity for housing

The Council will seek to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing, by:

- a) expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site;
- b) resisting alternative development of sites considered particularly suitable for housing; and
- c) resisting alternative development of sites or parts of sites considered particularly suitable for affordable housing, homes for older people or homes for vulnerable people.

The Council will seek to minimise the loss of housing in the borough by:

- d) protecting residential uses from 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.

- e) protecting permanent housing from conversion to short-stay accommodation intended for occupation for periods of less than 90 days;
- f) resisting developments that would involve the net loss of two or more homes, unless they:
 - create large homes in a part of the borough with a relatively low proportion of large dwellings,
 - enable sub-standard units to be enlarged to meet residential space standards, or
 - enable existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed.

As an exception to the general protection of residential floorspace, where no alternative site is available, the Council will favourably consider development that necessitates a limited loss of residential floorspace in order to provide small-scale healthcare practices meeting local needs.





Maximising the supply of additional homes

- 2.8 Housing is regarded as the priority land-use of the Local Development Framework, and the Council will make housing its top priority when considering the future of unused and underused land and buildings (see Core Strategy policy CS6). However, this priority does not override, but will be considered alongside, the need to protect some non-residential uses; to promote the national and international roles of Central London; and the need for development to respect the characteristics of the area and the site or property. Taking these considerations into account, a mix of uses or an alternative use will be appropriate for some sites. Where a mixed-use scheme including housing would be appropriate, the Council will seek to maximise the contribution to the supply of housing within the mix, taking into account policy DP1 and the criteria set out in paragraph 2.12.
- 2.9 High development densities are one way of making the maximum use of a site (in the context of housing, this means more homes or rooms in a given area). In accordance with policy CS1 of the Camden Core Strategy, the Council will expect the density of housing development to take account of the density matrix in the London Plan (Table 3A.2), and to be towards the higher end of the appropriate density range. However, the appropriate density will also depend on accessibility, the character and built form of the surroundings, and protecting the amenity of occupiers and neighbours. Given that the majority of the borough has relatively high public transport accessibility and is suitable for development of flats, densities should generally fall within the cells towards the right and bottom of the matrix, i.e. 45 to 405 dwellings per hectare.
- 2.10 There is a significant market in Camden for very large homes that have many more rooms than occupiers. The London Plan density matrix assumes that the number of habitable rooms per dwelling will average between 2.7 and 4.6. Developments including dwellings with significantly more 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. In the interests of mixed and inclusive communities, the Council seeks a range of dwelling sizes, and does not favour concentrations of very large homes. Therefore, when using the London Plan density matrix, the Council will refer primarily to dwelling densities, measured in units per hectare.



- 2.11 Where possible, we have identified underused sites that are suitable for additional housing in our Site Allocations Local Development Framework document, 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 the Sites Allocations document, the Council may also resist non-housing development on other sites that:
- have a valid consent for housing; or
 - are suitable for housing in terms accessibility and amenity, and are free of physical and environmental constraints that would prevent residential use.
- 2.12 In seeking to maximise the proportion of a site used for housing and deciding whether to resist a non-housing development, the Council will take into account:
- the need and potential to re-provide on site existing uses protected by other policies, such as industry, warehousing, community uses and shops;
 - other uses that are needed in the area, particularly in Central London, and the extent to which alternative sites or provision is available;
 - policy DP1, and whether a mixed-use development would be appropriate;
 - whether the supply of additional housing falls short of the overall target of 595 additional homes per year and the target of 437 additional self-contained homes per year; and
 - the financial viability of the proposal and the financial viability of housing development.
- 2.13 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, subject to the inclusion of an appropriate mix of dwelling-sizes and types (in accordance with other policies including DP3, DP5 and DP6). Further information on our approach to live-work premises is provided by policy DP13 and accompanying paragraphs.

Sites particularly suitable for affordable housing and housing for vulnerable people

- 2.14 The capital return and rental income of developments that provides affordable housing, housing for older people or housing for vulnerable people is limited. Therefore there is a danger that other more profitable forms of housing, such as student housing, will take-up potential sites and limit the supply of affordable housing and homes for vulnerable people.
- 2.15 As far as possible, the suitability of housing sites for affordable housing is identified in our Camden Site Allocations Local Development Framework document. However, a high proportion of the affordable housing provided in the borough is on sites that that have not been identified in advance. Where a site has been allocated for affordable housing or a proportion of affordable housing, or has a valid consent for a development including affordable housing, the Council will resist development that fails to include appropriate affordable housing provision. The appropriateness of an affordable

housing contribution will be considered in terms of the criteria set out in policy DP3, including the financial viability of the development. The Council will also resist the loss of any existing affordable housing, as set out in policy DP4.

- 2.16 Most additional housing for older people and vulnerable people is likely to be delivered by independent providers such as registered social landlords or charities. Where a site has been allocated to provide housing for older people or vulnerable people, the Council will resist housing development that fails to include these uses. The Council will also resist the loss of any existing housing for older people or for vulnerable people, as set out in policies DP7 and DP8.

Loss of residential floorspace

- 2.17 As set out in Core Strategy section CS6 and paragraph 2.6 above, the expected delivery of additional homes from 2010/11 to 2024/25 falls significantly short of the projected growth in the number of households up to 2026. Any loss of residential floorspace that could potentially house an individual or household would worsen this shortfall, and will be therefore be resisted by the Council. As noted in paragraph 2.5, housing takes a wide variety of forms capable of providing permanent residential accommodation. Policy DP2 relates to all of these forms, (although more detailed guidance is given in policies DP4, DP7, DP8 and DP9 on loss of affordable housing, sheltered housing and care homes for older people, accommodation for homeless people and vulnerable people, student housing, bedsits and other housing with shared facilities).
- 2.18 In some cases, residential accommodation is ancillary to another use, such as a caretaker's flat at a school, a staff flat above a shop or pub, or a nurses' home at a hospital. Alterations between the proportion of floorspace in the main use and the ancillary use will generally be outside planning control. However, where the development involves changing the main use or separating the housing floorspace from the main use, it will generally be subject to planning control, and we will seek to protect the residential floorspace.
- 2.19 In some circumstances, it may be appropriate for residential floorspace to be re-provided on an alternative site. We will have regard to policy DP1 (mixed-use development) when considering whether housing should be retained on-site or re-provided off-site. For the purposes of policy DP2, the Council will regard losses of residential floorspace as material if they reduce the number of people who can occupy a home or property. For the purposes of applying policy DP2 to hospitals and care homes (within Use Class C2), protection will apply only to the floorspace previously in permanent residential use, including staff housing, dormitories, permanent accommodation for people needing residential care, and any communal or circulation space associated with these. Additional guidance on protection of key-worker affordable housing for healthcare staff is included in Policy DP4.

Conversion to short-stay accommodation

- 2.20 There is a demand for short term and temporary accommodation in the borough, primarily to provide for visitors. This accommodation falls outside the Council's land-use priority for housing, and new demand should be met from appropriate sites in non-residential use, rather than sites used for permanent housing. In London, a switch from permanent housing to properties let for less than 90 days is considered to be a material change of use (under the amended Greater London Council (General Powers) Act 1973). The Council will resist development that changes permanent housing into such accommodation. Proposals to provide short-term accommodation for vulnerable people (such as people at risk from domestic violence) will be assessed in accordance with policy DP8.
- 2.21 Proposals for new short-term and temporary accommodation will be considered taking into account policies that seek to protect existing uses. Where a proposal involves accommodation for short-term visitors to Camden, the Council will take into account policy DP14 relating to tourism development and visitor accommodation.

Net loss of two or more homes

- 2.22 The expected shortfall in the delivery of homes up to 2024/25 is potentially worsened by the loss of dwellings in small schemes for housing conversion and redevelopment. In each of the 5 years

up to 2007/08, planning permission was granted for the loss of more than 80 dwellings in small conversion and redevelopment schemes, which, when implemented, will add to Camden's (net) annual target of 595 additional homes per year. As a result, there is considered to be little scope for the loss of existing homes in the borough, even where this does not involve loss of floorspace. 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.

- 2.23 The majority of permissions granted for the loss of homes involved schemes to combine 2 or more homes into a single large dwelling. Within the affordable housing stock, these changes are justified by the severe problems of overcrowding and the high proportion of existing one-bed dwellings. However, there is no comparable mismatch across the borough's market sector, and typical layouts suggest that merger of existing market homes is largely geared to a demand for high value housing rather than the creation of additional bedrooms for large families. Therefore, schemes that would create a loss of more than one residential property will generally be resisted. The Council does not seek to resist schemes combining dwellings that involve the loss of a single home.
- 2.24 The nature of the stock of market housing varies across the borough, and some areas have a much higher proportion of large dwellings than others. A mix of large and small units in an area can help to create more balanced communities (as different size dwellings meet the housing needs of different parts of the community) and increase housing choice. To achieve a more varied mix of housing, the Council will favourably consider proposals that create large homes out of smaller homes in parts of the borough where there is a relatively low proportion of large dwellings (that is, the wards of Bloomsbury, Holborn and Covent Garden, King's Cross, Kilburn, Regent's Park and St Pancras and Somers Town).
- 2.25 Some housing in the borough does not conform to current residential space standards. These are usually homes that were built before the standards were introduced or without the benefit of planning consent. Where existing homes fall substantially below the residential space standards set out in our Camden Planning Guidance supplementary document, the Council may consider proposals involving the loss dwellings in order to meet the standards. We will consider proposals favourably if existing homes are 20% or more below the space standards and the loss of dwellings is no greater than is necessary to meet the standard.
- 2.26 There is a particular shortage of affordable homes for large families in the borough (see Core Strategy section CS6 and policy DP5 below). Opportunities to reduce this shortage and reduce overcrowding could arise by reconfiguring or redeveloping existing housing, especially the stock of Council housing, which contains a disproportionate number of one-bedroom dwellings. The Council will favourably consider proposals that create large affordable housing for families by combining or redeveloping smaller affordable dwellings provided that there is no overall loss of residential floorspace.

Small-scale healthcare practices

- 2.27 Small-scale healthcare practices (such clinics for osteopathy and physiotherapy) may appropriately be provided in residential areas to ensure they are easily accessible to the people that need them, sometimes in association with the homes of the practitioners. The Council may support the loss of residential floorspace to provide these and similar small-scale healthcare facilities provided that the loss will not exceed one dwelling; no alternative non-residential premises are available nearby; and the proposal will meet needs in a local catchment. If there is no longer a need for these healthcare practices, the Council will expect the floorspace to return to residential use.

Key evidence and references

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing