

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.