

07

Meeting Housing Needs

07

Chapter



Maximising Housing Supply

7.1 The Council recognises that housing is vitally important to nearly every aspect of people's lives and that everyone deserves a safe and affordable place they call home.

7.2 However, housing in Camden is some of the most expensive to rent and buy in the UK, and there are not enough truly affordable homes for everyone.

7.3 The shortage of decent and affordable housing of all types and tenure is leading to people moving out of Camden – and many people who have grown up in the borough cannot afford to stay, especially when they start a family.

7.4 These issues also mean that some people and families are living in overcrowded and poor quality housing, which has a detrimental impact on mental and physical health, well-being, education and more. A disproportionate number of Camden families living in these conditions are from Black, Asian, or other ethnic communities.

7.5 We also know how important it is to ensure that all older people, disabled people, and other people with care or support requirements have accessible and appropriate housing that meets their needs, to promote health and well-being and a good quality of life.

7.6 To tackle these issues, we need to ensure that there is a sufficient supply of new homes in the borough to meet the needs of Camden's diverse communities, both now and in the future.

7.7 The Local Plan aims to deliver 11,550 additional homes (770 homes per year) in Camden over the Plan period 2026/27 to 2040/41. This target has been derived in accordance with the guidance in the London Plan, and includes the final three years of Camden's target for 2019/20 to 2028/29 from the London Plan, plus the anticipated backlog against this target at the start of the Local Plan period. Further information on the target and how new homes will be delivered in Camden are set out in Chapter 2 - Development Strategy. The Council recognises that work has commenced on review of the London Plan 2021 with a view to its replacement in 2027, and the replacement London Plan will set a new housing target for Camden.

7.8 Policy H1 sets out how the Council will seek to maximise housing supply in Camden over the Plan period, with subsequent policies providing guidance on the delivery of affordable housing and the mix of sizes and types of homes that are needed to meet the needs of particular groups of people.

Policy H1

Maximising Housing Supply

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- A.** The Council will aim to deliver at least 11,550 additional homes from 2026/27 to 2040/41.
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- B.** The Council will seek to secure a sufficient supply of homes to meet the needs of existing and future households in Camden to and meet or exceed the above housing target by:
1. regarding permanent self-contained housing as the priority land-use of the Local Plan;
 2. supporting other forms of permanent housing to meet more specific needs, such as purpose-built student accommodation and housing for people with care or support requirements;
 3. working to return vacant homes to use and ensure that new homes are occupied;
 4. resisting the further development in Camden of housing for use as short-term lets, unless it can be demonstrated to the Council's satisfaction that the site is unsuitable for the provision of any form of permanent housing;
 5. where sites are identified for development of permanent housing (particularly permanent self-contained housing) through a current planning permission or in a development plan, resisting development for an alternative use (other than a short-term meanwhile use compatible with subsequent permanent housing development), unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for the identified form of permanent housing, or (in the case of non-housing proposals) for any alternative form of permanent housing;
 6. where sites are underused or vacant, expecting the optimum provision of permanent housing (giving priority to permanent self-contained housing), unless it can be demonstrated to the Council's satisfaction that the site is unsuitable for the provision of permanent housing, or has no realistic prospect of timely development for permanent housing; and
 7. optimising the homes delivered on each site by using a design-led approach, in accordance with policies for design and heritage in the London Plan and the Local Plan, including any relevant space standards, to achieve the maximum reasonable provision of housing that is compatible with any other uses needed on the site.
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- C.** We will monitor the delivery of additional housing against the housing target and seek to maintain supply at the rate necessary to meet 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 rental value of different house types and tenures, and the needs of different groups.
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7.9 Housing development coming forward in Camden will be expected to be in conformity with the housing policies in this Plan and proposals should also be designed having regard to:

- other relevant policies throughout the Local Plan, particularly those on Design and Heritage, Amenity, Climate Change and Transport;
- Camden Planning Guidance, particularly documents on Design, Housing, Sustainability, Amenity, and Transport;
- The London Plan and Supplementary Planning Guidance / London Planning Guidance (SPGs/ LPGs) issued by the Mayor of London;
- Building for Life - the industry and government endorsed standard for well designed homes and neighbourhoods.

The meaning of “permanent self-contained housing”

7.10 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 (2021 Census Glossary of Terms). The term “permanent” is used to refer to housing where people live long-term (i.e. for periods of not less than 90-days) and is used to distinguish such housing from short-term lets or visitor accommodation. In Policy H1 and associated paragraphs, we have referred to permanent housing or permanent self-contained housing wherever the context makes this appropriate. In other parts of the Local Plan, we have not sought to insert the word “permanent” in every reference to housing or homes, but have included it when it is necessary to make policy requirements clear, such as when specifying the allocated use of a site.

7.11 In most cases permanent self-contained 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:

- houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (small houses in multiple occupation or HMOs, in Use Class C4, but can change to Use Class C3 without a planning application under the freedom provided in legislation); and
- self-contained homes provided in conjunction with another use, notably live/ work units, which are homes with a dedicated work area (not in any planning use class, but we will treat them as Use Class C3 when we apply Local Plan policies).

The priority given to permanent self-contained housing

7.12 The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Self-contained housing is prioritised relative to other forms of housing because it offers the greatest flexibility to accommodate a wide variety of household types, and the best prospect of delivering affordable housing in the context of very high affordable housing need from households with very limited incomes. The following paragraphs provide further details.

7.13 The majority of Camden’s residents live in self-contained homes, as part of a household, or as single person households. This includes people living in multi-adult households, such as groups of friends and flat shares. 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.

7.14 Camden's Local Housing Needs Assessment indicates that the borough's need for affordable housing over the period 2026 – 2041 significantly exceeds 50% of the overall supply of new housing envisaged by Policy H1, and greatly exceeds the delivery of 3,000 additional affordable homes anticipated by the delivery target in Policy H4. The Council can only maximise affordable housing delivery by maximising the delivery of self-contained housing. Although Policy H4 provides some flexibility for the delivery of affordable housing from more particular forms of housing development such as purpose-built student accommodation, only permanent self-contained housing can be required to deliver the forms of affordable housing that address the needs of those with the lowest incomes.

Support for other forms of permanent housing

7.15 In recent years, the market in Camden has been unable to deliver the numbers of homes envisaged by the Camden Local Plan 2017 or the London Plan 2021, and therefore the borough's score was below 100% under the Housing Delivery Test's measurements for 2021, 2022 and 2023. Given challenging market conditions for housebuilders and the flow of investment towards rental products that deliver a long-term revenue stream, the Council recognises that diversity of housing supply is necessary to maximise housing delivery, and that this may involve more particular forms of housing, some of which are not self-contained.

7.16 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 provides less flexibility for alternative occupiers and can create a greater risk of conflict between people with different cultures and lifestyles.

7.17 In the light of these considerations, the Council supports a number of more particular forms of housing, including build to rent and housing for people with care or support requirements (such as older people), subject to the specific Local Plan policies for those types of housing, and the particular form(s) of housing specified in each site allocation. Detailed requirements for more particular forms of housing are set out in Policies H6 and H8 to H11.

Ensuring homes are occupied

7.18 Government data provides a snapshot of the number of vacant homes each October, including homes vacant for 6-months or more (long-term). Whilst the number of long-term vacant homes in Camden fluctuates, it has exceeded 1,000 homes in nine of the ten years from October 2015 to October 2024, and reached a high of 1,652 long-term vacant homes in 2024 (approximately 1.5% of estimated dwelling stock). Government data also indicates that the ratio of Camden's median house price to the median annual earnings of residents has exceeded seventeen to one for each year from 2014-2023, suggesting that the demand for housing far outstrips supply. Whilst an element of vacancy in the housing stock is inevitable, given the high demand for housing in Camden, returning vacant homes to use is a key priority.

7.19 In the light of this data, the Council will continue to use a variety of means to bring empty homes back into use, including:

- issuing Council Tax penalties – where a home has been empty for 2 years and over, this attracts a 100% premium, doubling the council tax payable. If the property remains empty for 5 years or more a 200% premium will be payable, tripling the council tax payable. Homes kept empty for over 10 years or more will attract a 300% premium, which quadruples council tax payable;
- taking enforcement action where works to a property are required;
- issuing an empty dwelling management order under the Housing Act 2004; and
- using compulsory purchase orders to acquire land and buildings.

7.20 In addition to these measures, the Council will explore ways to ensure that investment homes are made available for occupation, such as encouraging owners to use our local lettings agency Camden Lettings. The Council will also apply Local Plan policies flexibly where this is necessary to enable refurbishment of a property that would otherwise remain vacant.

Resisting the development of housing for use as short-term lets

7.21 The Council will support proposals for hotels and visitor accommodation in suitable locations where their impacts are appropriately mitigated, as set out in Chapter 9 - Delivering an inclusive economy. However, the growing use of new and existing homes in Camden for short-term lets threatens to seriously reduce the stock of housing available to long-term residents, whilst proposals to create new housing specifically for short-term lets threaten our ability to meet targets for delivery of permanent housing.

7.22 Under the current legislation applicable to London, planning permission is required for a residential property to be used for short-term lets (let for periods of less than 90-days) unless the use is restricted to a total of 90 days in any one year. However, on the basis of data commissioned for Central London First, in Camden there are over 4,000 short-term lets being offered for aggregate periods exceeding the 90 day restriction, and over 5,000 entire homes being marketed for short-term lets. In addition, data compiled by Camden indicates that equivalent weekly rental for short-term let in Camden is over twice the average rent available in the wider market, and over three times for 1 bedroom and 2 bedroom homes. Given the threat that the growth of this use poses to the rental housing market and the delivery of new permanent homes, the Council will resist the development of housing for use as short-term lets, unless the site is shown to be unsuitable for the provision of any form of permanent housing. Further information is provided in association with Policy H3 (Protecting Existing Homes).

Resisting alternative development of identified housing sites

7.23 As noted above, Camden has recently experienced disappointing results from the Housing Delivery Test, and has affordable housing needs that greatly exceed the likely future supply. Consequently, the Council must make strenuous efforts to deliver additional permanent housing.

7.24 Where possible, we have identified underused sites that are suitable for additional permanent self-contained housing or another form of permanent housing and allocated them in this Plan, and we will resist an alternative use of these 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 this, the Council will also resist the alternative development of sites without an allocation where they have an existing consent for self-contained housing or another form of permanent housing (an existing consent is one that has not expired or remains in effect because development has been started).

7.25 If an alternative permanent housing use is proposed on a site identified for permanent self-contained housing, the Council will expect the submission of evidence to demonstrate that there is no reasonable prospect of a viable development for permanent self-contained housing coming forward within the Plan period. If an alternative non-housing use is proposed on any site identified for permanent housing, the Council will expect the submission of evidence to demonstrate that there is no reasonable prospect of a viable development for any form of permanent housing coming forward within the Plan period. All relevant material considerations will be taken into account, such as whether the alternative development will free up a replacement site in the borough for permanent housing or provide an essential community facility or infrastructure that cannot be accommodated elsewhere.

7.26 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 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.

7.27 As indicated above, short-term lets or visitor accommodation are not considered to be a suitable alternative use of a site identified for any form of permanent housing because they do not meet our assessed housing needs or contribute to meeting our targets for delivery of permanent housing.

Optimising sites to deliver housing

7.28 To maximise housing output whilst ensuring high standards of design and amenity, we will use a design-led approach to optimise the delivery of housing on each site that comes forward. Further guidance on this is set out in the Mayor's London Planning Guidance (LPG) on Optimising Site Capacity: A design led approach.

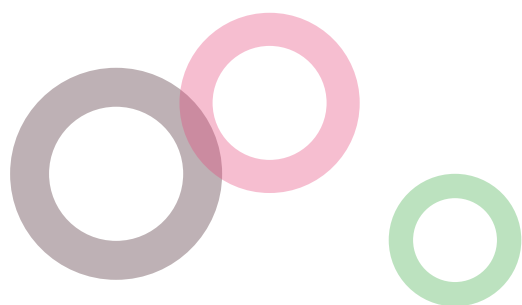
7.29 Where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for permanent housing (prioritising self-contained housing) unless:

- 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 the Central Activities Zone;
- the site is identified for another use in a development plan document; or
- it is demonstrated to the satisfaction of the Council that the site is unsuitable for permanent housing (e.g. in terms of the amenity of occupiers) or there is no reasonable prospect of a viable development for permanent housing coming forward within the Plan period.

7.30 Where non-residential uses are required on the site, the Council will seek mixed-use schemes including the maximum appropriate provision of permanent housing. Details of our approach to seeking the inclusion of permanent self-contained housing as part of mixed-use developments in defined areas of high public-transport accessibility are set out in Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes).

7.31 When considering the optimum number of homes, the Council will have regard to all relevant policies and guidance, particularly those related to design and heritage, such as policies addressing conservation areas, the appropriateness of tall buildings, mobility difficulties and accessibility, and applicable space standards. We will also consider the accessibility of the site by public transport and the density of housing in the immediate context. Taking account of the Sustainable Residential Quality density matrix in the London Plan 2016, the Camden Local Plan 2017 indicated that densities of new self-contained homes should generally be between 45 dwellings per hectare (in areas of existing low density or lower public transport accessibility) and 405 dwellings per hectare (in areas of existing high density or higher public transport accessibility). This range continues to be appropriate as a broad guideline, but the Council recognises that lower or higher densities may be justified in some contexts.

7.32 We will expect self-contained housing to comply with the nationally described minimum space standards as adopted in the London Plan and Local Plan Policy D3 (Design of Housing). For major developments (those involving 10 or more homes), we will also seek to minimise the proportion of self-contained homes that exceed the space standard (for the relevant number bed spaces / occupiers and storeys) by more than 50%, whilst bearing in mind that large homes or apartments may be appropriate as the characteristic built form in some contexts, and may be the best way to secure development viability in some local markets and from some parts of buildings (e.g. the upper floors of tall buildings).



Flexible implementation

7.33 Given current and future uncertainties, there is a need to monitor the supply of housing 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 low-cost rented housing (homes for Social Rent or London Affordable Rent) 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 planning obligations sought to maintain viability.

7.34 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 other Local Plan objectives.

7.35 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, government departments and agencies, the Mayor and the GLA, and other local authorities – particularly councils in Central and North London.





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

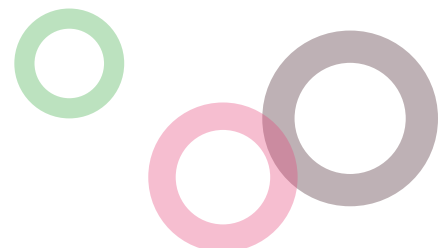
7.36 Policy H2 promotes the inclusion of permanent self-contained housing as part of a mix of uses. It applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase.

7.37 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.

7.38 Policy H2 specifically seeks provision of permanent self-contained housing (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). The meaning of the term “permanent self-contained housing” is explained in the paragraphs below Policy H1.

7.39 Policy H2 sets out a specific approach to seeking permanent self-contained housing as part of a mix of uses in “defined areas of high public transport accessibility”. These defined areas comprise:

- the defined South Camden sub-area;
- the town centre of Camden Town, along with the southern edge-of-centre area enclosed by the town centre boundary, Camden Road, the boundary of the South Camden sub-area, and Parkway;
- the town centre of Finchley Road / Swiss Cottage.



Policy H2

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

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- A.** Where non-residential development is proposed in any part of the borough, the Council will support the aims of Policy H1 by promoting the inclusion of permanent self-contained homes as part of a mix of uses.
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- B.** In the defined areas of high public transport accessibility (set out in paragraph 7.39), we will expect a contribution to permanent self-contained housing from all developments that provide additional non-residential floorspace and involve additional floorspace of 200 sqm (GIA) or more. The Council will seek to negotiate the contribution to permanent self-contained housing on the following basis:
1. a self-contained housing target of 50% is applied to all additional floorspace proposed (GIA);
 2. the target is not applied to development in the defined Hatton Garden area provided that an equivalent contribution to jewellery workspace is provided in place of permanent self-contained housing;
 3. the target is not applied to development (or parts of development) which are publicly funded or otherwise serve an acknowledged public purpose provided that the public purpose is secured for a reasonable period;
 4. the target is applied to additional floorspace proposed, not to existing floorspace or replacement floorspace;
 5. the target is sub-divided to provide an affordable housing target and a market housing target on the basis of Policy H4;
 - a. for developments involving an additional floorspace of at least 200 sqm (GIA) but less than 1,000 sqm (GIA), we will seek on-site delivery of self-contained housing, but will have regard to the criteria in Part C of this policy, and provide flexibility for off-site delivery where on-site delivery would demonstrably and unavoidably result in housing or non-residential floorspace of unsatisfactory quality;
 - b. for developments involving an additional floorspace of 1,000 sqm (GIA) or more, self-contained housing should be provided on site, subject to the criteria in Part C;
 6. for developments involving an additional floorspace of 2,000 sqm (GIA) or more, affordable housing should be provided on site, subject to the provisions of Policy H4;
 7. where the self-contained housing target cannot be met in full, we will prioritise the on-site delivery of affordable housing;
 8. where self-contained housing cannot practically be provided on site, or off site provision would create a better contribution (in terms of quantity, quality and / or affordability), the Council may accept provision of self-contained housing off site in the same area, or exceptionally a payment-in-lieu.
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Policy H2

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

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- C.** In considering whether the self-contained housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:
1. the character and size of the development, and any constraints on developing the site for a mix of non-residential uses and self-contained housing, including constraints arising from operational requirements of the proposed non-residential use and other nearby uses;
 2. the impact of a mix of uses on the efficiency and overall quantum of development;
 3. the extent of any additional floorspace needed for an existing user;
 4. any floorspace needed for particular Central Activities Zone (CAZ) activities, having regard to CAZ strategic functions and specialist clusters recognised by the London Plan, and designations in this Plan;
 5. the vision, objectives and policies of the Euston Area Plan and the particular challenges affecting land directly involved in the construction and / or redevelopment of the stations at Euston, including the funding requirements associated with rail infrastructure, and the potential for a flexible approach across a portfolio of sites, having regard to the residential and non-residential floorspace involved in demolition related to rail infrastructure and replacement of properties;
 6. whether active street frontages, natural surveillance and community safety (within and outside normal business hours) can best be promoted through the provision of self-contained housing, retail or other uses;
 7. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as visitor accommodation, and any recommendations of an independent viability assessor commissioned to advise the Council; and
 8. whether an alternative approach could better meet the objectives of this policy and the Local Plan.
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- D.** In the defined areas of high public transport accessibility (set out in paragraph 7.39), where provision of self-contained housing falls significantly short of the Council's 50% target due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek an early and/ or a late stage viability review to determine the maximum deliverable contribution to affordable housing and/or deliverability of an additional financial contribution towards the self-contained housing shortfall.
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7.40 Policy H1 indicates that where sites are underused or vacant, we will expect the optimum provision of housing that is compatible with any other uses needed on the site. Where it is not appropriate to develop a site entirely for housing, securing permanent housing as part of a mixed-use scheme is another way of meeting some of Camden's housing needs whilst also meeting other needs in the area, such as providing jobs, services and facilities. Developing a mix of uses on individual sites and across an area can also be beneficial in other ways, such as:

- increasing community safety and security by providing a range of activities that attract people at different times during the day and evening;
- contributing to the creation of areas that are diverse, distinctive and attractive;
- reducing the need to travel between homes, jobs and services;
- overcoming the loss of customers for shops and services arising from increased home-working and less consistent occupation of workplaces; and
- allowing an efficient use of land, with housing developed above those uses which benefit from direct ground floor access or a street-level frontage, such as shops.

7.41 Much of the borough already has a well-established mixed-use character. To support this mixed-use character and the aims of Policy H1, the Council will encourage non-residential development throughout the borough to provide a mix of uses including permanent self-contained housing.

7.42 Where Policy H2 applies to development, the Council will generally seek permanent self-contained housing (in Use Class C3). This is consistent with the specification of permanent self-contained housing as the priority land-use of the Local Plan in Policy H1. The term “permanent” refers to any housing that is available to let to a single occupier or household for a period of not less than 90-days, and is used to distinguish it from short-term lets or visitor accommodation (accommodation available to let throughout the year for periods of less than 90 days). Short-term lets or visitor accommodation are not acceptable alternatives to permanent self-contained housing because they do not meet our assessed housing needs or contribute to meeting our targets for delivery of permanent housing.

7.43 To ensure that housing provided as part of a mixed use scheme contributes to meeting the targets identified in Policy H1, rather than being used as ancillary space by non-residential occupiers, the homes should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.

7.44 The Council has established detailed requirements for non-residential development in the defined areas of high public transport accessibility (set out in paragraph 7.39) as these are the parts of the borough which have the most intense pressure for non-residential uses, the best potential for a mix of uses, the best prospect for the development of housing above active street frontages, and the best access to public transport. The requirements apply to the South Camden sub-area and the town centres of Camden Town (including an edge-of-centre area around the southern part of the town centre) and Finchley Road / Swiss Cottage. The edge-of-centre area around the southern part of Camden Town is enclosed by the boundaries of the town centre and the South Camden sub-area, which meet to the east at Camden Road and to the west at Parkway. As parts of this area have potential for non-residential development (particularly close to Bayham Street and Arlington Road), if the requirements did not apply, there is a significant risk that developers of town centre uses would favour this area over the town centre itself.

7.45 Additional housing in these specified locations will help provide activity and surveillance when businesses are closed, enliven marginal areas at the periphery of established frontages, and support shops, services and local facilities. Therefore, the Council will require development schemes in these specified areas to provide a mix of uses subject to the considerations set out in Policy H2, and will seek half of all additional floorspace as permanent self-contained housing (in Use Class C3), such that additional floorspace in residential use matches all the additional floorspace in non-residential uses.

7.46 In these locations, Policy H2 provides criteria used to determine whether a contribution to self-contained housing is sought, the type of housing sought, whether the housing should be provided on site or off site, and achieving an appropriate mix of housing and other uses. The following paragraphs explain these in turn. Further details of the operation of Policy H2 are also set out in the Council's Camden Planning Guidance on Housing, and developers will be expected to have due regard to this.

Proposals where we will seek a contribution to housing

7.47 Proposals for additional non-residential floorspace in the defined areas of high public transport accessibility will be expected to contribute to permanent self-contained housing in accordance with the provisions of criteria (1) to (10) in Part B of Policy H2. The Council has applied a target of 50% for the proportion of self-contained housing since in 2004, and has used this successfully as the starting point for negotiations. The target is applied flexibly, having regard to the full set of criteria in Part C.

7.48 No contribution is sought from developments involving additional floorspace of 200 sqm (GIA or gross internal area) or less. This threshold is based on the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development.

7.49 In the designated Hatton Garden area, the Council's priority is to secure and protect a stock of premises for the jewellery sector and support the nationally important cluster of jewellery manufacture and trading that gives the area its special character. Consequently, in accordance with Local Plan Policy S3, in the Hatton Garden area we will seek a contribution to affordable jewellery workspace rather than a contribution to housing.

7.50 We will not seek a contribution from those elements of a development that are publicly funded or otherwise serve an acknowledged public purpose, such as hospitals, museums, educational, medical and research institutions, and transport infrastructure and facilities. We recognise that the nature of public funding may preclude development to serve other purposes, the sites available to the public purse are often too constrained to provide space for other uses, and the nature of some public services will not be compatible with housing (e.g. 24 hour activity and movements serving a hospital). Challenges arising from funding and rail infrastructure associated with the Euston stations (HS2 and National Rail) will also have a bearing on the operation of Policy H2, as discussed further in paragraph 7.69.

7.51 Policies elsewhere in the Local Plan (such as the Inclusive Economy chapter) seek to protect a number of existing non-residential uses, such as offices, industry and warehousing. In addition, the London Plan prioritises offices and other strategic functions in the Central Activities Zone. To ensure that valued non-residential uses are not compromised, we will only seek a contribution to housing from net additions to floorspace, and not to existing floorspace that is retained, refurbished or replaced.

Whether the housing contribution should be made on-site

7.52 We recognise that where the additional floorspace proposed is less than 1,000 sqm GIA, given the need to accommodate separate access lobbies, stairs and lifts, maintain existing ground floor activity, provide an efficient layout, and provide a satisfactory standard of residential amenity, it may be difficult to accommodate a contribution to housing on-site. Consequently, for schemes of this scale, we will provide flexibility for off-site contributions where on-site provision would demonstrably compromise the quality of the space. However, we will expect larger schemes to provide on-site contributions to self-contained housing. In all cases, we will have regard to the full set of criteria in Part C of this policy.

Relationship with affordable housing requirements

7.53 Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought subject to the provisions of Policy H4. Based on the additional floorspace proposed, the 50% target for self-contained housing, and the provisions of Policy H4, the self-contained housing target will be sub-divided into an affordable housing target and a market housing target. This will enable us to operate a priority for delivery of affordable housing, as explained in the following paragraphs.

7.54 Policy H4 anticipates that affordable housing will be provided as a payment-in-lieu for developments with capacity for fewer than 10 additional dwellings, while larger schemes will provide affordable housing on-site. Under the provisions of Policy H4, developments with capacity for 10 additional homes will generally be those involving a residential floorspace of 1,000 sqm GIA or more (when rounded to the nearest 100 sqm). Considering this in tandem with the Policy H2 target for 50% of additional floorspace to take the form of self-contained housing, where the total additional floorspace proposed is 2,000 sqm (GIA) or more, we will expect on-site provision of affordable housing.

7.55 The 2017 London Strategic Housing Market Assessment indicated that 47% of the housing need in London would be for low-cost rented housing and a further 18% would be for intermediate housing. Camden's Local Housing Needs Assessment found a broadly similar range of affordable housing needs, but with as much as 60% of anticipated housing supply being required to meet the need for low-cost rented housing. Over the years 2016 – 2021, 923 additional affordable homes were delivered in Camden, which was 27% of the five-year need based on the Camden Strategic Housing Market Assessment 2016. Consequently, where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the Council will prioritise delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4. For example, in the past we have accepted proposals which omit the market housing but deliver the entire affordable housing component, and schemes which deliver only affordable housing by switching the tenure of market homes to be delivered elsewhere (not yet built, but benefitting from a live planning permission).

7.56 Where the floorspace sought for self-contained housing under the terms of Policy H2 has capacity for 16 or more additional homes, we will apply the London Plan affordable housing viability thresholds as set out in association with Local Plan Policy H4. When applying the thresholds, we will have regard to the high level of affordable housing needed compared with past delivery, and prioritise the delivery of affordable housing. Where a viability threshold below 50% applies, the Council will generally encourage the development to deliver solely the full 50% strategic target of affordable housing as an alternative to delivering the full target level of self-contained housing alongside a lower viability threshold level of affordable housing, but will negotiate having regard to the quality and mix of affordable homes that can be achieved.

Off-site contributions

7.57 There may be circumstances (even when the additional floorspace is 1,000 sqm or more) where housing cannot practically be achieved on-site or would more appropriately be provided off-site (for example where the entire additional floorspace is needed for an existing user). Relevant considerations are set out in Part C of this policy. Where the Council considers that off-site provision is appropriate this will be secured through a planning obligation. There is intense competition for development sites in Camden, which creates a risk that no site will become available for delivery of the housing if it cannot be identified by the time the non-residential application is determined. Consequently, the Council will normally expect the planning obligation to specify the anticipated delivery site (or sites).

7.58 When considering the merits of off-site delivery, the Council will have regard to other land-holdings an applicant may own or control in the borough (sometimes referred to as a 'portfolio' approach), and the potential for using land-use swaps to deliver permanent housing off-site whilst off-setting non-residential additions. Where an applicant anticipates bringing forward non-residential development in the future, we will also consider requests to use land-use credits which the applicant is awarded for delivering off-site permanent housing in advance on a site that would otherwise remain in non-residential use. This 'portfolio' approach may be suitable to address the challenges arising from funding and rail infrastructure associated with the Euston stations (HS2 and National Rail), as identified by criterion 5 of Policy H2 Part C. Ways to address these challenges are as discussed further in paragraph 7.69.

7.59 For off-site provision, we will assess how much housing is required by looking at all sites involved in the arrangement. We will apply the 50% target to the additional floorspace added at all sites involved, taking into account the full addition to non-residential floorspace proposed at the application site, any gain or loss of non-residential floorspace arising at the site or sites where the housing will be delivered and the need to replace any existing housing lost as part of each development. Where the housing is delivered off-site, this will enable additional non-residential space to be provided at the application site, and increase the overall scale of development, so the Council will expect to achieve a significantly enhanced housing contribution off-site (in terms of quantity, quality and / or affordability), having regard to the net additional non-residential floorspace across all sites.

7.60 The Council will seek any off-site provision of housing on an alternative site (or sites) nearby. All alternative sites must be in the borough, and should be as close as possible to the application site as possible. Where the development is in the South Camden sub-area, alternative sites should be sought in the same sub-area. Where the development is in the town centre of Camden Town (including the identified edge-of-centre area), alternative sites should be sought in the Central Camden or South Camden sub-areas. Where the development is in the town centre of Finchley Road / Swiss Cottage, alternative sites should be sought in the West Camden or Central Camden sub-areas. In all cases, provided the applicant can demonstrate to the Council's satisfaction that they have undertaken a thorough exploration of options, if no appropriate sites are available in the specified sub-areas, the Council may be prepared to consider sites in other parts of the borough where warranted by the overall benefits of the developments facilitated. As part of the consideration of off-site options we will explore with developers whether the housing could be delivered on Council-owned land.

Higher Education institutions and student housing

7.61 Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for housing, we may accept a payment-in-lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation. Payments should be based on the difference between: the value of the development as proposed (with no self-contained housing, or with less self-contained housing than is required by Policy H2); and the value of a similar hypothetical development including the full requirement for self-contained housing (including any required affordable housing). This basis ensures that the payment is equivalent to the gain to the developer from failing to meet the full self-contained housing requirement.

7.62 More detailed information regarding the calculation of off-site provision and payments-in-lieu is provided in our Camden Planning Guidance on housing and Camden Planning Guidance on planning obligations, and developers will be expected to have due regard to this. Camden Planning Guidance currently sets a payment rate of £1,500 per sqm (GIA) of omitted self-contained housing (including the market and affordable housing), based on viability testing a variety of development typologies. This rate will be updated periodically through Camden Planning Guidance to reflect changes in development values and costs. Applicants may also submit their own financial viability appraisal to indicate an appropriate level of payment calculated on the basis set out above. In such cases, the Council will seek funding from the developer for an independent verification of the appraisals.

7.63 In accordance with Part B criterion 3, we will not seek a housing contribution from development of non-residential floorspace secured for occupation by a Higher Education institution which is supported by the Office for Students, and thereby serves a public purpose. In addition, where development is proposed by a Higher Education institution supported by the Office for Students, as an alternative to seeking permanent self-contained housing, the Council may support a mixed-use development including student housing (known as purpose-built student accommodation) that serves the same institution, subject to the student accommodation satisfying the requirements of Policy H9.

7.64 Student accommodation proposed in accordance with Policy H9 is considered to be residential floorspace and therefore the requirements of Policy H2 do not apply. The Council will not seek the inclusion of self-contained housing in such proposals except in relation to the application of Part D of Policy H4 (which encourages contributions to affordable housing) and Part B of Policy H1 (which resists alternative development of sites identified for permanent self-contained housing).

Achieving an appropriate mix of housing and other uses

7.65 Where permanent self-contained housing is sought as part of a mix of uses, all criteria in Policy H2 will be used to help us consider the appropriate mix of housing and other uses for a site, and whether the housing should be provided on the site or elsewhere. Further detail of how these criteria will be applied are set out in the Council's Camden Planning Guidance on housing (including the assessment of financial viability), and developers will be expected to have due regard to this. A number of considerations relating to Part C of Policy H2 are set out below.

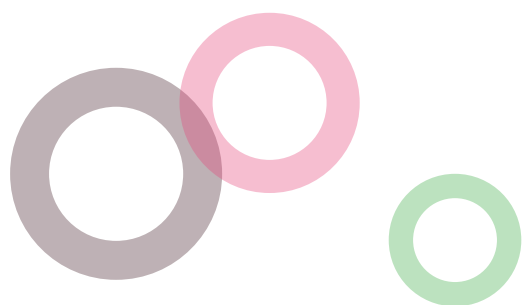
7.66 The character and size of the development may influence the mix of uses that is most appropriate. For example, elements of a development that adjoin existing buildings and / or are adjacent to a narrow street may be unable to provide satisfactory daylight and sunlight for permanent housing, while those involving cultural uses, such as performance spaces, may be unable to accommodate permanent housing in the same building due to levels of noise and vibration. Developments may also be constrained by the need to incorporate an existing building (especially a listed building or a building that makes a positive contribution to a conservation area) which is unable to accommodate particular new features necessary to support housing or non-residential uses, such as additional doors and window openings to serve housing, or generous floor to ceiling heights with contemporary mechanical and electrical services to meet the needs of commercial uses.

7.67 The appropriate mix will also be influenced by the impacts of multiple entrances, staircases and lifts, particularly where a limited street frontage is available, or where both market and affordable housing are sought. We will take account of the impacts on the overall usable area, the layout of the different uses, and how these factors affect viability. We will also consider the space needs of existing users and seek to ensure that they can expand without relocating.

7.68 In some areas, there may be local priorities to be balanced against the priority given to housing, particularly in the Central Activities Zone (CAZ). The town centres and the CAZ provide frontages that are key to the area's retail and service function, and these should not be compromised by the introduction of alternative uses or extensive entrance lobbies. The CAZ also supports some uses that have a national or international function and make major contributions to Camden's economy, and their needs will be given significant weight. In addition, the Council supports the institutions and activities that comprise the Knowledge Quarter in the general area of King's Cross and Euston, such as the Wellcome Institute and the British Library, and their requirements may be foremost in particular locations.

7.69 Part C of Policy H2 recognises the particular challenges affecting land directly involved in the construction and redevelopment of rail infrastructure at Euston, and the potential for a flexible approach across the sites involved. As indicated in paragraph 7.58 earlier, the Council will consider use of a 'portfolio' approach across sites in the same ownership and/ or control when applying the requirements of Policy H2 to the land involved. In applying Policy H2, we will also take account of the potential to replace the floorspace of properties that have been demolished in preparation for redevelopment to provide the Euston stations (HS2 and National Rail). In all cases, we will expect proposals to be in accordance with the vision, objectives and policies of the Euston Area Plan.

7.70 Residential and non-residential uses can both add to community safety by increasing the diversity and vitality of streets and providing natural surveillance. When considering these factors, we will consider all publicly accessible spaces within and surrounding a development, the interface between the development and public spaces at street level and above, and the levels of activity and surveillance inside and outside normal business hours.



7.71 The Council will positively consider alternative approaches that can better deliver a supply of land for permanent self-contained housing, for example making a site available for housing development by another organisation such as the Council or a Housing Association. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver a mixed-use scheme containing housing, such as the impact of providing a new station entrance to promote use of public transport.

7.72 In negotiating the appropriate mix of uses, the Council will consider all aspects of financial viability including particular costs associated with the development and the distinctive viability characteristics of particular development sectors (such as visitor accommodation). We will generally expect submission of a financial viability appraisal to justify the mix proposed, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. The Council will also expect developers to fund an independent verification of the appraisal.

7.73 Where a contribution to permanent self-contained housing is sought by Policy H2 but financial viability constraints prevent a development from meeting the 50% target and there is a prospect of viability improving prior to completion, the Council will expect a late stage viability review to take place when costs and receipts are known as far as possible. Where a requirement for on-site affordable housing applies, we may seek an early stage viability review in accordance with Local Plan Policy H4 and the London Plan viability thresholds.

7.74 Where an early stage viability review shows that viability has improved since permission was granted, we will seek additional affordable housing on-site in accordance with the London Plan. Where a late stage viability review shows that viability has improved, we will seek a further financial contribution to self-contained housing, not exceeding the payment-in-lieu that would arise from the shortfall between the initial contribution and the 50% target, and having regard to any other priority uses introduced as an alternative to self-contained housing. Our Camden Planning Guidance on housing provides more detailed guidance on viability review mechanisms, and developers will be expected to have due regard to this.





Protecting existing homes

7.75 Policy H3 seeks to protect all permanent residential floorspace where people live long-term (i.e. for periods of not less than 90 days).

7.76 We have not sought to insert the word “permanent” in every reference to housing or homes, but have included it when it is necessary to make policy requirements clear. It also seeks to protect individual self-contained houses and flats (in Use Class C3), and some other individual homes as follows:

- houses and flats shared by 3 to 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, in Use Class C4, but can change to Use Class C3 without a planning application under the freedom provided in legislation); and
- live / work units, which are self-contained homes that include a dedicated work area (not in any planning use class, but we will treat them as Use Class C3 when we apply Local Plan policies).

7.77 Other policies in this section of the Local Plan also include 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 other people with care or support requirements is protected by Policy H8;
- student housing (known as purpose-built student accommodation) 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 (housing with shared facilities, including larger houses in multiple occupation or HMOs) is protected by Policy H10.

Policy H3

Protecting existing homes

- A.** The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by seeking to: retain all existing residential floorspace; prevent year-round use of housing as short-term lets; and prevent the net loss of homes from alterations to existing houses and flats.
-
- B.** The Council will resist development that would involve a net loss of residential floorspace, including any residential floorspace that is provided:
1. within hostels or other housing with shared facilities; or
 2. as an ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use.
-
- C.** The Council will resist the year-round use of residential floorspace as short-term lets (lets for periods of less than 90 days).
-
- D.** The Council will resist development affecting existing houses and flats that would result in the net loss of homes, unless the development:
1. amalgamates homes to create one larger home and results in the net loss of only one home (taking into account extant permissions and cumulative change since June 2006);
 2. enables the creation of additional large homes with 3-or-more bedrooms in the wards of Bloomsbury, Holborn and Covent Garden, Kilburn, and King's Cross;
 3. alters existing affordable homes to enable the creation of the affordable dwelling-sizes that are most needed; or
 4. enlarges sub-standard homes to meet the nationally described space standard where they are currently 20% or more below it and the loss of homes is the minimum necessary to meet the relevant standard.
-

Loss of residential floorspace

7.78 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 housing and regards self-contained housing as the priority land-use of the Local Plan. Where it reduces the number of people that can be accommodated, loss of floorspace from shared housing adds to the amount of housing required to meet our housing targets. Homes with 3 bedrooms are a high priority amongst market homes and affordable homes for low-cost rent, as set out in our Dwelling Size Priorities Table associated with Policy H7, but the supply of these homes can be reduced by the loss of floorspace from self-contained homes. Consequently, the Council resists development that would involve a net loss of residential floorspace from any type of existing housing.

- 7.79** The types of housing we aim to protect include:
- floorspace at hostels, nursing homes, care homes and hospitals where people live long-term, such as accommodation for nurses, people requiring support or rehabilitation to return to independent living, and for people who are no longer able to live independently (including resident lounges, sleeping areas, bathrooms / toilets, and associated circulation space); and
 - 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.

7.80 Small losses of residential floorspace may be acceptable where they will enable delivery of other Local Plan priorities, but we will resist any reductions in floorspace that are material because they reduce the number of residents who can occupy a home or property.

Short-term lets

7.81 Short-term lets are lets for any period of less than 90-days, and frequently involve periods of a few days or weeks. As set out in the paragraphs supporting Policy H1 (Maximising Housing Supply), the Council is supportive of hotels and visitor accommodation in suitable locations and with appropriate mitigation of impacts, but the recent growth in the use of existing homes as short-term lets threatens to seriously reduce the stock of housing of housing available to long-term residents. 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 use as housing for short-term lets throughout the year would constitute development.

7.82 As indicated in association with Policy H1, data commissioned for Central London Forward indicates that over 5,000 entire homes in Camden are being marketed for short-term lets. The data also shows that more than 10% of Camden's private rented homes are offered as entire properties available for short-term lets over aggregate periods exceeding 90 days. Consequently we will resist proposals that would involve a permanent change of residential floorspace from long-term accommodation to use for short-term lets throughout the year.

7.83 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 of residential properties where this is necessary to protect the amenity of the locality. The Council will monitor the impact of visitor lettings and if evidence emerges of harm to amenity in particular locations, we will consider seeking exemptions from the provisions that allow it. Householders considering letting out their property are also 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.

Net loss of homes

7.84 Housing targets 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. Based on past evidence, we estimate that approximately 50 dwellings a year are lost through development affecting existing housing that involves a net loss of homes. Past evidence also shows that around 40% are lost in developments involving the loss of a single home, many of which involve combining two flats to create a single dwelling. The Council therefore aims to ensure that the overall supply of housing will not be compromised by developments involving a net reduction in the number of existing homes. 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.

7.85 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 certain situations, as specified in the following paragraphs.

7.86 Net loss of 1 home is acceptable when 2 dwellings are being amalgamated 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 loss of 2 homes or more within the same building or site, whether through individual applications or a series of incremental changes over the period since the adoption of this policy approach in June 2006, taking account of any past permissions that have been implemented or have not expired. We will also seek to co-ordinate the determination of multiple applications affecting homes at the same building or site to ensure that the net loss of 2 or more homes is not permitted unless this would be in accordance with criterion 2, 3 or 4 in Policy H3 Part D.

7.87 The four wards of Bloomsbury, Holborn and Covent Garden, Kilburn, and King's Cross currently have a low proportion of large dwellings compared with the borough overall. Data from the Census in 2011 and 2021 shows that less than 25% of households in these wards had 3 or more bedrooms (compared with over 30% across Camden).

Consequently, in these wards, the Council considers a net loss of homes to be acceptable (including a net loss of 2 or more homes) where this enables the creation of 1 or more additional large dwellings with 3 or more bedrooms.

7.88 The existing stock of Social Rented housing (particularly Council housing) is heavily skewed to 1 and 2 bedroom homes. The 2021 Census indicates that 19.7% of households in Social Rented housing are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 9.5% across all tenures. We may therefore accept a net loss of affordable homes (including a net loss of 2 or more homes) where this enables the creation of affordable homes of the sizes that are most needed. Having regard to Policy H7 – Large and Small Homes – the homes created should generally include large homes with 3 or more bedrooms for Social Rent or London Affordable Rent.

7.89 Residential space standards are set out in the nationally described space standard and included in the London Plan. We may permit a net loss of homes (including a net loss of 2 or more homes) 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.

Further guidance

7.90 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 net loss of small houses in multiple occupation. This reflects the freedom provided in legislation for changes between these uses without a planning application.

7.91 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 criteria in Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) when considering whether housing should be retained on-site or re-provided off-site.

7.92 Our Camden Planning Guidance on housing provides further information about how we will apply Policy H3, and developers will be expected to have due regard to this.



Maximising the supply of affordable housing

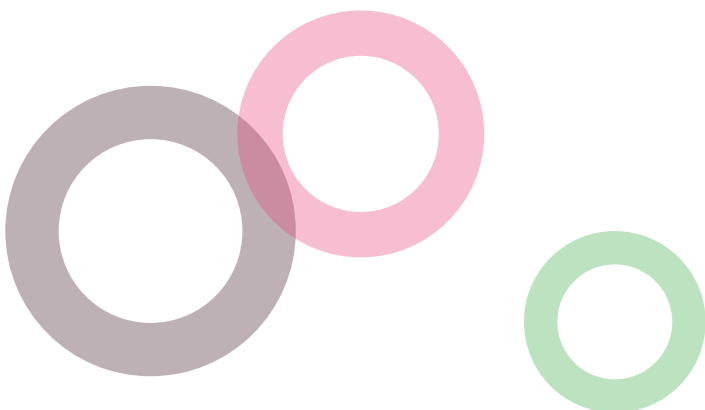
7.93 Policy H4 seeks to maximise the supply of affordable housing in Camden to meet the needs of households unable to access market housing.

7.94 Policy H4 applies primarily to the following types of housing:

- self-contained houses and flats (Use Class C3);
- 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, in Use Class C4, but can change to Use Class C3 without a planning application under the freedom provided in legislation); and
- live / work units, which are self-contained homes that include a dedicated work area (not in any planning use class, but we will treat them as Use Class C3 when we apply Local Plan policies).

7.95 We will also apply Policy H4 to other types of housing, subject to the provisions in this Plan and in the London 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 Parts D and E. Other policies in this section of the Local Plan also include more specific provisions protecting particular types of housing, as follows:

- affordable housing provisions for estate regeneration proposals are included in Policy H5;
- affordable housing provisions for market-led development of housing for older people, homeless people and other people with care or support requirements are included in Policy H8;
- affordable housing provisions for student housing (known as purpose-built student accommodation) are included in Policy H9; and
- affordable housing provisions for other housing where occupiers do not live as a family but are long-term residents sharing some rooms and/ or facilities (larger houses in multiple occupation or HMOs, and large-scale purpose-built shared living) are included in Policy H10.



Policy H4

Maximising the supply of affordable housing

- A.** The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable. The Council will aim to maximise the supply of affordable housing, meet or exceed a borough wide delivery target of 3,000 additional affordable homes from 2026/27 - 2040/41, and achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.
- B.** We will expect a contribution to affordable housing from all major developments involving housing, and non-major developments that provide one or more additional homes and involve a total addition to housing floorspace of 100 sqm GIA or more. The Council will seek to negotiate the contribution to affordable housing on the following basis:
1. distinctive criteria will apply to smaller developments considered to have capacity for 15 or fewer additional homes, and larger developments considered to have capacity for 16 or more additional homes;
 2. development capacity will be assessed on the basis that 100sqm (GIA) of housing floorspace creates capacity for 1 home;
 3. in assessing development capacity, the additional housing floorspace will be rounded to the nearest 100 sqm (GIA);
 4. in the case of smaller developments, a sliding scale target will apply, starting at 2% for developments with capacity for one additional home and increasing by 2% for each home added to the capacity (reaching an affordable housing target of 30% for developments with capacity for 15 additional homes);
 5. in the case of larger developments, the London Plan's strategic affordable housing target of 50% will apply, but will be subject to the London Plan's viability threshold approach;
 6. in all cases, we will apply a guideline mix of affordable housing types to seek 60% low-cost rented housing and 40% intermediate housing;
 7. in all cases, we will assess the percentage of affordable housing and of each affordable housing type (usually low-cost rented housing and intermediate housing) on the basis of both the proposed housing floorspace and the proposed number of habitable rooms;
 8. for the largest developments involving housing (typically those providing 100 homes or more), the Council may seek affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision;
 9. the affordable housing sought should be provided on site wherever practical, particularly in the case of larger developments;
 10. where affordable housing cannot practically be provided on site, or off site provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing off site in the same area, or exceptionally a payment-in-lieu; and
 11. in the case of estate regeneration proposals, the distinctive affordable housing provisions for this type of development in Policy H5 and the London Plan will apply.

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- C.** We will seek to ensure that where development sites are split, additional proposals are brought forward on the same site, or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution is comprehensively assessed for all the proposals together. The Council will seek to use planning obligations to ensure that all parts or phases of split or related sites make an appropriate affordable housing contribution.
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- D.** Where a development of build to rent housing, purpose-built student accommodation, or large-scale purpose-built shared living is proposed, we will apply the distinctive affordable housing provisions of the London Plan for the relevant housing type, but as an alternative will strongly encourage contributions of self-contained affordable housing on these development sites in accordance with the guideline mix set out in criterion 6 of Part B above where feasible, having regard to whether developments are able to include separate blocks and/ or stair/ lift cores.
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- E.** In considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:
1. any existing housing on site, including market housing and affordable housing, the provisions for protection of existing housing and estate regeneration proposals in Policies H3 and H5, and the impact that the existing housing has on the financial viability of the development;
 2. any self-build or custom-build housing proposed, and whether this housing is consistent with the objective of Policy H1 to optimise the homes delivered on each site;
 3. any housing proposed for people with care or support requirements (notably specialist older persons housing), the objectives of Policy H8, and any relevant provisions of the London Plan;
 4. the character and size of the development, and any constraints on developing the site for a mix of housing including market and affordable housing or the particular types of affordable provision sought;
 5. the impact on creation of mixed, inclusive and sustainable communities;
 6. the impact of the mix of housing types sought on the efficiency and overall quantum of development;
 7. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors, such as build to rent housing, and any recommendations of an independent viability assessor commissioned to advise the Council; and
 8. whether an alternative approach could better meet the objectives of this policy and the Local Plan.
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- F.** Having regard to the London Plan, where a development's contribution to affordable housing falls significantly short of the Council's targets due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek early, mid-term and / or late stage viability reviews to determine the maximum contribution to affordable housing deliverable by the development.
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Meaning of affordable housing

7.96 Affordable housing is provided to households whose needs are not met by the market. The London Plan supports two broad categories of affordable housing, low-cost rented housing and intermediate housing.

7.97 Low-cost rented housing comprises homes for Social Rent or London Affordable Rent. Eligibility is determined by the Council's Housing Allocation Scheme. Low-cost rented housing is mostly owned by the Council or Housing Associations, and is subject to national rent setting guidance. Social Rents are guided by a national formula rent, whereas London Affordable Rents are based on the national formula but subject to GLA benchmarks, which are slightly higher than formula rent in Camden.

7.98 Intermediate housing costs less than market housing but more than low-cost rented housing and is provided to households with low to medium incomes. Eligibility is controlled by income caps set in the London Plan (and updated in London Plan Guidance and Annual Monitoring Reports), and by national policy for affordable home ownership. In Camden, it generally takes the form of intermediate rented housing in accordance with the Council's Intermediate Housing Strategy, but intermediate housing can also include shared ownership, First Homes and other forms of affordable home ownership where these can be made affordable to eligible households. In some cases, occupation may be prioritised or limited to key workers, such as health service staff, teachers and workers in emergency services.

7.99 The Council will seek planning obligations to ensure that affordable housing complies with these definitions, is available to Camden households that are unable to access market housing, and continues to be available at an affordable price in the future unless any subsidy is recycled. We will also ensure that the affordable housing is:

- delivered before or concurrently with any market housing forming part of the same proposal; and
- delivered in strict accordance with Local Plan objectives by a provider (usually a Housing Association) approved by the Council.

7.100 The Mayor's guidance on Viability and Affordable Housing advises that generally shared ownership is not appropriate where unrestricted market values of a home exceed £600,000. For the year ending September 2022, the average house price of newly built dwellings in Camden exceeded £800,000 and the average price paid by first-time buyers exceeded £600,000 in every month. Consequently, there is little prospect of delivering shared ownership at an affordable price in Camden.

7.101 In 2021 (shortly after publication of the finalised London Plan 2021), the Government introduced a product called First Homes, which is housing sold to first-time buyers at a discount, with the discount passed on at subsequent sales. In London, First Homes are to be sold to first-time buyers earning no more than £90,000 per year at a discount of at least 30% and at a price after discount of no more than £420,000. The GLA has issued guidance noting that in many cases discounts required in London to reach £420,000 would exceed 30%, while the homes are likely to be small, and accessible only to households close to the maximum eligible income.

7.102 The GLA guidance advises that in considering the potential for First Homes, decision-makers should continue to give weight to the London Plan, alongside the need for other affordable housing tenures, the level of discount required to reach the £420,000 price cap, and the impact this would have on delivery of other tenures. The Council's Planning Statement on the Intermediate Housing Strategy and First Homes (2022) considered these matters in detail, and concluded that First Homes are not a suitable form of affordable housing for delivery in Camden, and their inclusion should not be sought in developments in the borough.

7.103 The NPPF advises that major developments (generally those providing 10 or more homes) should expect a mix of affordable housing to meet identified local needs. It indicates that the mix can include Social Rent, other affordable housing for rent, and affordable home ownership. For the reasons set out above, the delivery of affordable home ownership in Camden is likely to be challenging. However, the Council will work with the GLA to assess whether there is potential to deliver an affordable home-ownership product of some kind that complies with London Plan and national guidance on price caps and eligible household incomes.

7.104 More detailed information on the mix of affordable tenures and rent levels sought in Camden and the Intermediate Housing Strategy are included in our Camden Planning Guidance on housing, and developers will be expected to have due regard to this.

Strategic affordable housing target and delivery target

7.105 The London Plan 2021 sets a strategic target for 50% of all homes across London to be genuinely affordable, based on the findings of the 2017 London Strategic Housing Market Assessment that 47% of the housing need in London would be for low-cost rented housing and a further 18% would be for intermediate housing. Camden's Local Housing Needs Assessment found a broadly similar range of affordable housing needs, but with as much as 60% of anticipated housing supply being required to meet the need for low-cost rented housing.

7.106 To set this Plan's target for affordable housing we have taken the overall housing target (including market housing), and estimated the maximum number of affordable homes likely to be viable and deliverable, taking into account affordable housing need, the relationship between development costs, the value of market and affordable homes, the funding available from the Mayor's Affordable Homes Programme, the income households have to spend on housing, past levels of delivery and the anticipated housing output of the Council's Community Investment Programme. Balancing these considerations, this Plan sets a delivery target of 3,000 additional affordable homes over the Plan period (200 per year).

Proposals that generate an affordable housing requirement

7.107 For consistency with the London Plan, Policy H4 seeks a contribution to affordable housing from all major developments involving housing. Major development is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010. In the context of the density of development in Camden, relevant major developments will generally be those providing 10 or more self-contained homes, or providing a building or buildings creating a floorspace of 1,000 sqm or more to be used for housing. Policy H4 also seeks a contribution from some non-major developments as explained below.

7.108 The NPPF advises that affordable housing should only be sought from major developments involving housing. In the light of the scale of affordable housing need in the borough, through examination of the Camden Local Plan 2017 the Council was able to make a successful case for local departure from the national approach. Policy H4 maintains the position in the Local Plan 2017, which sought an affordable housing contribution from all schemes that provide one or more additional homes and also involve a total addition to housing floorspace of 100 sqm GIA or more. This threshold excludes any homes or housing floorspace retained or replaced as part of the development, so in some cases developments exceeding this threshold also fall within the definition of major developments.

7.109 The Council's threshold for seeking contributions to affordable housing, and our approach to contributions from smaller developments, have been devised to minimise the risk of suppressing the delivery of homes, and have operated successfully since adoption of the Camden Local Plan 2017. As contributions are only required where a development involves both at least one additional home and 100 sqm GIA of additional housing floorspace, no contribution is sought from:

- schemes that simply extend or replace an existing home or homes (which helps the Council to expedite the replacement of homes that are subject to damage or disrepair, and the extension of homes for families that are growing or need space to care for a relative who is elderly or disabled);
- schemes that involve the subdivision of existing housing to create more homes; or
- schemes that provide one home or more where the total additional housing floorspace (including ancillary space) is below 100 sqm GIA (e.g. one home of 90 sqm GIA or two homes of 45 sqm GIA each).

7.110 Policy H4 also maintains two other characteristics of the Local Plan 2017 which alleviate the risk of negative impacts from seeking affordable housing contributions from small schemes. The first is the use of a sliding scale for affordable housing targets from smaller developments which have capacity for 15 or fewer additional homes. The sliding scale has been designed to achieve the maximum reasonable contribution overall without deterring development, causing delays to decision-making, increasing the burden of financial viability appraisals, or risking creation of a high starting target that suppresses scheme or dwelling size. More information about the operation of the sliding scale is provided in paragraphs 7.114 to 7.117. The other relevant characteristic is that the Council will continue to provide flexibility for payments-in-lieu of affordable housing from the smallest developments (those involving with capacity for fewer than 10 additional homes).

7.111 The case for seeking affordable housing contributions from schemes below the national threshold is undiminished. Camden's Local Housing Needs Assessment indicates that around 60% of the anticipated housing supply would be required to meet the need for low-cost rented housing. Similarly, the Camden Strategic Housing Market Assessment 2016 (SHMA) found a need for 10,200 affordable homes from 2016 – 2031, being 61% of the overall housing requirement for the period. Based on the SHMA, and the factors determining likely delivery set out in paragraph 7.106 above, the Camden Local Plan 2017 set a target for delivery of 5,300 additional affordable homes from 2016-31. Over the first five years of that Plan period (2016-2021), 923 additional affordable homes were delivered in Camden, which was 27% of the five-year need (3,400) indicated by the SHMA, and 52% of the five-year target (1,767) set out in the Local Plan.

7.112 For the purposes of Policy H4 we will treat proposals for small houses in multiple occupation (Use Class C4) in the same way as proposals for self-contained homes (Use Class C3) and seek provision of affordable housing from major developments, and non-major developments for one or more additional small houses in multiple occupation where they involve a total addition to housing floorspace of 100 sqm GIA or more. This reflects the freedom provided in legislation for changes between these uses without a planning application. We will also seek provision of affordable housing from proposals for live-work units in the same way as proposals for self-contained homes (Use Class C3) where they involve major developments, or at least one additional home and 100 sqm GIA additional housing floorspace is provided, except that our assessment of the affordable housing target/ delivery will exclude any spaces which are to be protected exclusively as work areas through a planning obligation.

Basis for seeking affordable housing provision from specific proposals

7.113 Given the scale of affordable housing need in the borough, the Council aims to maximise the supply of affordable housing from each development site, having regard to the London Plan's 50% strategic target, and this Plan's delivery target for 3,000 additional affordable homes. The criteria in Policy H4 Part B provide a common basis for negotiations while criteria in Part E set out factors that will determine what is reasonable in any particular case. The following paragraphs outline the operation of criteria in Part B, while the subsequent section outlines criteria in Part E. Our Camden Planning Guidance on housing provides more detailed guidance on the operation of the criteria.

Negotiating contributions from smaller developments using the sliding scale

7.114 Our criteria for negotiating the proportion of affordable housing from specific schemes distinguish between smaller developments with capacity for 15 or fewer additional homes, and larger developments with capacity for 16 or more additional homes. Having regard to the nationally described space standard, the mix of dwelling sizes sought by Policy H7 (Large and small homes), and the ancillary space required (such as common circulation and bin and cycle storage), we consider that developments can achieve an average of no more than 100 sqm GIA per home, and accordingly we will assess the capacity for additional homes on the basis that 100 sqm GIA residential floorspace has capacity for one additional home.

7.115 We will assess the capacity of each development for additional homes on the basis of multiples of 100 sqm GIA, rounding the additional housing floorspace to the nearest 100 sqm GIA so the assessed capacity will always be a whole number. For example, we will generally consider an additional 473 sqm GIA to have capacity for 5 additional homes, an additional 1,239 sqm GIA to have capacity for 12 homes, an additional 1,457 sqm GIA to have capacity for 15 homes, and an additional 1,648sqm GIA to have capacity for 16 homes. However, we will take into account any constraints on capacity where existing buildings are converted for housing, particularly listed buildings and other heritage assets. The assessed capacity for additional homes will be used to determine the percentage affordable housing required in accordance with sliding scale set out in Policy H4 Part B and paragraphs in this section.

7.116 A sliding scale target will apply to smaller schemes involving one or more additional homes. The sliding scale starts from a target of 2% where there is capacity for 1 additional home, and increases on a 'straight-line' basis. Capacity for each further additional dwelling (or each 100 sqm GIA additional floorspace) increases the target by 2%. Thus the target for a scheme with capacity for an additional 5 dwellings is 10%, at 12 additional dwellings the target is 24%, and at 15 additional dwellings that target is 30%. The sliding scale will not apply to larger schemes with capacity for 16 or more additional dwellings.

7.117 We will apply affordable housing targets on the sliding scale directly to the proposed addition to residential floorspace (rather than to the number of homes or 'units' or the capacity for additional homes) to create an affordable housing floorspace target. For example, in the case of a development with an additional 473 sqm (GIA) housing floorspace, the percentage target will be 10%, and the floorspace target will be 47.3 sqm (GIA). For an additional 1,239 sqm (GIA), the percentage target will be 12%, and the floorspace target will be 148.68 sqm (GIA). For an additional 1,457 sqm (GIA), the percentage target will be 15%, and the floorspace target will be 218.55 sqm (GIA).

Larger developments and London Plan Viability Thresholds

7.118 As set out in Part B of Policy H4, larger developments are considered to be those with capacity for 16 additional homes or more. Under our approach to capacity assessment, these will generally be developments involving an additional housing floorspace of 1,550 sqm GIA or more. For larger developments, the London Plan's strategic affordable housing target will apply, but will be considered in tandem with the London Plan's viability threshold approach.

7.119 The Council will operate the London Plan viability thresholds prevailing at the time of determining an application, taking into account the proportion of floor area and the proportion of habitable rooms in each tenure. For developments that must be referred to the Mayor under the provisions of the relevant legislation, the proportion of habitable rooms in each tenure will be the primary consideration. The London Plan indicates that where the proportion of affordable housing reaches or exceeds the relevant threshold level, there is no requirement to submit a financial viability appraisal in support of the application, but that if construction has not adequately progressed after a specified period (usually two years after permission is granted), an early stage viability review will be sought to indicate whether there is potential for any additional affordable housing contribution.

7.120 The London Plan 2021 sets a viability threshold of 50% for industrial land and most public sector land and a 35% viability threshold in other cases (details appear in London Plan 2021 Policy H5). These viability thresholds may be amended through future London Plans or London Plan guidance, and we will apply the latest thresholds to be formally approved. Considering the 2021 viability thresholds, the 35% threshold will apply to most larger developments involving housing that come forward in Camden. This dovetails well with the sliding scale for smaller developments, as an affordable housing target of 30% will apply to proposals with capacity for 15 additional homes, whereas a viability threshold of 35% will apply to most proposals with capacity for 16 or more additional homes.

7.121 Where a development is subject to Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) and the floorspace sought for self-contained housing has capacity for 16 or more additional homes, we will apply the London Plan viability thresholds in association with the prioritisation of delivery of affordable housing set out in Policy H2 and its supporting text. Where a viability threshold below 50% applies, the Council will generally encourage development to deliver solely the full 50% strategic target of affordable housing as an alternative to delivering the full target level of self-contained housing alongside a lower viability threshold level of affordable housing, but will negotiate having regard to the quality and mix of affordable homes that can be achieved.

Guideline mix of affordable housing types

7.122 As indicated in paragraph 7.105 earlier, Camden's Local Housing Needs Assessment suggests that as much as 60% of our anticipated housing supply would be required to meet the need for low-cost rented housing. There is also a need for intermediate housing (between the cost of social rented housing and market housing), which has some potential to retain middle income households in Camden and lessen social polarisation. However, high values in many parts of the borough mean that the intermediate housing can be more expensive than the cheaper market housing available elsewhere. To balance these considerations and take account of the relative needs found by Camden's Local Housing Needs Assessment, the Council has set guideline percentages for the split of affordable housing types at 60% low-cost rented housing (homes for Social Rent or London Affordable Rent) and 40% intermediate housing.

7.123 Intermediate housing for shared-ownership, First Homes, and other forms of affordable home ownership can help households into owner occupation, but in Camden it is rarely possible for providers to deliver housing of these types that would be affordable for households with incomes close to the borough median, and highly challenging to deliver schemes that comply with the maximum eligible income and price cap set out in the London Plan and national guidance. Given these constraints, we will strongly encourage provision of homes for intermediate rent. We will also encourage the development of innovative intermediate housing products that can be made affordable to a wider range of groups in Camden, including innovative forms of affordable home ownership.

7.124 The guideline mix will be applied flexibly taking into account the criteria in Policy H4, and in certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing. We will encourage a focus on low-cost rented housing where a proposal falls far short of the affordable housing target (e.g. below 30% affordable), or intermediate housing cannot be delivered for people in a range of incomes below the London Plan thresholds. Where a proposal substantially exceeds the affordable housing target (e.g. over 65% affordable), or involves the loss of key-worker housing such as a nurses' hostel, the Council may support development that only provides intermediate housing, and may also support development to meet the needs of a particular group (e.g. development by an NHS Trust for key health service workers).

Assessment of the affordable housing percentage on the basis of floorspace and habitable rooms

7.125 The Council has been assessing the percentage of affordable housing in housing developments on the basis of floorspace since the adoption of the Camden Core Strategy and Camden Development Policies in 2010. Our previous experience of assessment based on the number of homes indicated that it encouraged developers to

deliver the smallest possible affordable homes in order to minimise their impact on the development's financial value, rather than delivering affordable homes of the size most needed. Similar thinking has informed the use of habitable rooms in the London Plan 2021 to assess housing developments against the relevant viability thresholds.

7.126 Policy H4 continues to consider the percentage of affordable housing on the basis of floorspace to enable us to achieve an appropriate range of affordable dwelling sizes to meet the borough's needs. Camden's Local Housing Needs Assessment indicates that the predominant need for low-cost rented housing is from households requiring 3 bedroom homes, but that there are also substantial needs from households requiring 2 bedroom homes and those requiring 4 bedrooms or more. Our own data based on the Housing Register indicates that households requiring larger homes (particularly those requiring 4 bedrooms or more) face the longest wait for a suitable home to become available.

7.127 Further evidence of the need to provide large affordable homes in Camden is provided by the 2021 Census, which indicates that Camden's housing stock is skewed towards 1 and 2 bedroom homes, particularly the rented housing stock. Specifically, 72% of households in Social Rented housing occupied 1 or 2 bedroom homes, while only 28% occupied homes with three-bedrooms or more. The 2021 Census also allows us to consider overcrowding in terms of households with a bedroom occupancy rating of -1 or less – effectively those requiring at least 1 additional bedroom. This measure indicates that in 2021, 19.7% of households in Social Rented housing were living in overcrowded homes, compared with 5.7% of those in the private rented sector and 2.8% of those in owner-occupation.

7.128 When considering the proportion of affordable housing proposed, and the proportions of different types of affordable housing (usually low-cost rented housing and intermediate housing), the Council will take account of gross internal area (GIA) or net internal area (NIA), depending on the nature of the scheme and the most reasonable measure for comparison. In some cases, common areas may potentially be shared between tenures (such as cycle stores and bin stores), making it simpler to measure the NIA for a single tenure. However, in some cases, market housing may contain communal facilities such as resident gyms, which add to the value of the market homes, and make GIA a more reasonable method of comparison.

7.129 In connection with the viability threshold approach, the London Plan indicates that the percentage of affordable housing should be considered in terms of habitable rooms. The Council will consider habitable rooms alongside floorspace, and accepts that habitable rooms may provide a helpful method of comparison in some circumstances, such as where a development of purpose-built student accommodation offers self-contained affordable homes rather than affordable student accommodation. However, there are distinct drawbacks to the habitable rooms measure, particularly in view of severe overcrowding of Social Rented housing and the high value of market housing prevailing in Camden.

7.130 In relation to overcrowding, and to accommodate growing families, the Council seeks to ensure that wherever possible (in addition to the main bedroom), any second bedroom in low-cost rented housing is able to accommodate 2 people (e.g. 2-bedroom 4-person homes and 3-bedroom 5-person homes). The habitable rooms measure discourages developers from providing second bedrooms suitable for 2 people as it fails to take the size of the rooms into account, so the additional cost of larger bedrooms is not recompensed by acknowledgement of a higher percentage of affordable housing. Conversely, many properties in Camden are in high value or prime residential markets, and are developed with exceedingly large habitable rooms compared with their counterparts in affordable homes – but under the habitable rooms measure, the additional value arising from large rooms in market housing does not lead to

any commensurate increase in the affordable housing sought. A further drawback of the habitable rooms measure is that an open-plan living and dining room or an open-plan living room, kitchen and diner will count as a single room, discouraging the adoption of open-plan layouts for affordable homes even where it is the best way to ensure a good level of natural light for each component.

7.131 Taking these drawbacks of the habitable rooms measure into account, the Council will adopt floorspace as the primary measure of the percentage of affordable housing in most circumstance. However, as indicated in paragraph 7.119, for developments that must be referred to the Mayor under the provisions of the relevant legislation, the proportion of habitable rooms in each tenure will be the primary measure.

Provision of affordable housing for people with care or support requirements

7.132 Policy H4 provides for the Council to seek affordable housing to meet the particular needs of older people, or other people with care or support requirements, in association with the largest developments involving housing. Typically, we will seek to meet these particular needs from developments involving 100 homes or more, but we will negotiate having regard to the characteristics of the site, any aspects that would make the site particularly appropriate to meet the requirements of a specific group (e.g. the ability of the location to fill gaps in existing provision, or proximity to existing facilities serving that group, such as the Greenwood Centre for Independent Living), and the capabilities of any Registered Provider expected to take transfer of the affordable housing.

7.133 As indicated in association with Policy H8 (Housing for older people, homeless people and other people with care or support requirements) and supporting paragraphs, the Council will focus on meeting care and support needs by providing support in existing homes (with adaptations where necessary), but new supported living accommodation may be needed for some groups such as people living with dementia and people with learning disabilities. We anticipate that a proportion of any new provision would need to be in the affordable sector, but the distinctive viability characteristics of supported living mean that affordable provision is unlikely to be delivered in conjunction with market-led supported living. We will seek provision primarily in schemes involving 100 homes or more, as such schemes offer potential for affordable homes for people with care or support requirements to be clustered and benefit from coordinated support. In considering whether affordable housing should be sought for people with care or support requirements, and the scale and nature of provision, the Council will also take into account all relevant criteria in Policy H4 (Maximising the supply of affordable housing) and Policy H8 (Housing for older people, homeless people and other people with care or support requirements).

Whether the affordable housing should be provided on-site

7.134 The NPPF indicates that where affordable housing is needed, policies should set out to meet this need on-site. However, the NPPF also indicates that provision of affordable housing should only be sought from major development involving housing, and consequently our approach to seeking affordable housing from smaller developments represents a local departure from national policy in some cases. Recognising this departure, we will provide flexibility for the smallest developments to provide the affordable housing contribution in the form of a payment-in-lieu.

7.135 The Camden Local Plan 2017 provided for payments-in-lieu of affordable housing to be accepted as a matter of course from proposals with capacity for fewer than 10 additional homes (i.e. a floorspace below 1,000 sqm GIA when rounded to the nearest 100 sqm), and we intend to continue this practice will continue. We consider payments-in-lieu are appropriate for these smallest schemes (in tandem with relatively modest floorspace targets based on the sliding scale) as the affordable housing required would rarely be equivalent to a whole dwelling, and the obstacles to on-site delivery would generally exceed the benefits. More information on payments-in-lieu is provided by paragraphs 7.141 and 7.142. However, we note that in some cases, proposals with capacity for fewer than 10 additional homes will constitute major developments due to the presence of existing housing on the site, and where this is the case we will have regard to the London Plan stipulation that major developments should provide affordable housing on site.

7.136 In line with the NPPF and the London Plan, the Council's strong preference for larger developments is for affordable housing to be provided on-site alongside market housing because this helps to create mixed and inclusive communities and ensure that the delivery of the affordable housing is secured to the same timescale as the market housing. Furthermore, the availability of alternative sites where affordable housing could be delivered is limited.

7.137 The Council accepts that even in the case of larger developments there are some circumstances where it may be appropriate to deliver some or all of the affordable housing off-site. In considering whether off-site provision is appropriate, the Council will consider the criteria set out in Policy H4 and other relevant factors such as whether a greater number of affordable homes could be delivered through an off-site solution, whether it is practical for a single block to accommodate market and affordable homes, and the affordability of the anticipated service charges. Market and affordable housing have been successfully delivered alongside each other on a number of relatively small sites in Camden, and the Council will expect developers to demonstrate that they have worked with affordable housing providers to consider fully whether the development can be designed to provide on-site affordable housing.

7.138 Where a development has capacity for 10 or more additional homes and the Council considers off-site provision is appropriate, the Council will take into account all related sites when assessing how much affordable housing is required. Where a development omits affordable housing, it will be possible to deliver additional market housing on-site, and the Council will expect to achieve a significantly enhanced affordable housing contribution off-site (in terms of quantity, quality and / or affordability), having regard to the market housing proposed across all sites.

7.139 Where off-site provision is appropriate, we will seek development of the affordable housing on an alternative site (or sites) nearby, secured by a planning obligation. Given the intense competition for sites in Camden, the Council will normally expect the planning obligation to ensure delivery of the affordable housing by specifying the anticipated delivery site (or sites).

7.140 All alternative sites must be in the borough, and should be as close to the application site as possible. Where the development is in the defined South Camden sub-area, alternative sites should also be sought in the South Camden sub-area. Where the development is in the Central Camden, West Camden or North Camden sub-areas, sites should initially be sought in the same sub-area as the development, but if no appropriate sites are available in the same sub-area, the Council will subsequently seek sites in any part of the borough outside the South Camden sub-area. In all cases, provided the applicant can demonstrate to the Council's satisfaction that they have undertaken a thorough exploration of options, if no appropriate sites are available in the specified sub-areas, the Council may be prepared to consider sites anywhere in the borough where warranted by the overall benefits of the developments facilitated. As part of the consideration of off-site options we will explore with developers whether the affordable housing could be delivered on Council-owned land.

7.141 Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for affordable housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation. Payments should be based on the difference between: the value of the development as proposed (with no affordable housing, or with less affordable housing than is required by Policy H4); and the value of a similar hypothetical development including the full requirement for affordable housing. This basis ensures that the payment is equivalent to the gain to the developer from failing to meet the full self-contained housing requirement.

7.142 More detailed information regarding the calculation of off-site provision and payments-in-lieu is provided in our Camden Planning Guidance on housing and Camden Planning Guidance on planning obligations, and developers will be expected to have due regard to this. Camden Planning Guidance currently sets a payment rate of £5,000 per sqm (GIA) of omitted affordable housing, based on viability testing a variety of development typologies. This rate will be updated periodically through Camden Planning Guidance to reflect changes in development values and costs. Applicants may also submit their own financial viability appraisal to indicate an appropriate level of payment calculated on the basis set out above. In such cases, the Council will seek funding from the developer for an independent verification of the appraisal.

Estate regeneration proposals

7.143 We will seek the delivery of affordable housing from estate regeneration proposals following the distinctive approach for this type of development set out in Local Plan Policy H5 and the London Plan. Estate regeneration proposals should retain or replace all existing affordable housing (including all existing low-cost rented housing), and be subject to viability testing to determine how much additional affordable housing can be provided. We will consider the types of additional affordable housing provided having regard to the guideline mix of low-cost rented housing and intermediate housing incorporated in Policy H4.

Split sites and related sites

7.144 Where a site or a group of related sites becomes available for development, the Council will expect proposals to take the form of a comprehensive scheme rather than piecemeal development, and will expect a single assessment of the maximum reasonable amount of affordable housing taking account of all components. We will seek to resist schemes that are artificially split into a series of proposals to avoid reaching the affordable housing threshold or the full 50% strategic affordable housing target. Where there are proposals to extend a permitted scheme or increase the housing in the period before or shortly after completion, we will calculate and apply an affordable housing target that reflects the scale of the entire development. We will seek planning obligations to ensure that each part of a split or phased development makes an appropriate affordable housing contribution, having regard to the contribution that would arise from a single assessment across all components.

Build to rent housing, purpose-built student accommodation, and large-scale purpose-built shared living

7.145 Where market-led development of build to rent housing, purpose-built student accommodation or large-scale purpose-built shared living is proposed, we will apply Policy H4 as far as appropriate, having regard to Part D and all specific provisions for these types of housing in this Plan and in the London Plan. In essence, the London Plan provides for: the affordable housing contribution from build to rent housing to take the form of homes for Discount Market Rent; the contribution from purpose-built student accommodation to take the form of affordable student accommodation; and the contribution from large-scale purpose-built shared living to take the form of a payment-in-lieu. The Council will support proposals to offer contributions in accordance with these London Plan provisions, but in view of Camden's shortfall in affordable housing supply when compared to need, as an alternative we will strongly encourage contributions of self-contained affordable housing on-site in accordance with the guideline mix

set out in Part B. We note that it will only be feasible to provide the guideline mix where the affordable housing can be provided in a separate block and/ or be accessed from a separate stair/ lift core, rather than being fully integrated into the host development (whether of build to rent housing, purpose-built student accommodation, or large-scale purpose-built shared living).

Achieving an appropriate mix of market and affordable housing types

7.146 Criteria in Policy H4 Part E indicate the factors that we will consider when assessing the mix of market, intermediate and low-cost rented housing appropriate for a site, and whether any off-site delivery of affordable housing is appropriate. Details of how these criteria will be applied are set out in our Camden Planning Guidance on housing (including the assessment of financial viability), but a number of key considerations are set out below.

7.147 Where there is existing housing on a potential development site, this can have a major impact on the viability proposals and the willingness of landowners to bring the site forward, even where there is a prospect of significantly increasing the total amount of housing provided. The presence of existing market homes will tend to increase the development value that needs to be achieved for a proposal to be viable. Any existing affordable housing on the site would need to be re-provided in accordance with Policy H5, creating substantial costs without any corresponding return in terms of additional rents or sales.

7.148 Policy H4 includes a mechanism to overcome this in the case of smaller developments by adopting a sliding scale affordable housing target based on the amount of additional housing floorspace provided. Policy H5 also includes a mechanism to overcome this in the case of estate regeneration proposals by using viability testing to determine the proportion of additional housing that should be affordable. In all other cases, Part E allows us to consider the impact of any existing housing on a scheme-specific basis.

7.149 Having regard to the Self-build and Custom Housebuilding Act 2015 (as amended), the Council encourages provision of self-build and custom-build homes. In particular, we recognise that such homes may sometimes provide a low-cost route to home ownership by providing for future occupier to spread the cost of their home across the development process, or reduce the development cost, for example through their own input to the design or the build and through their choice of contractors and materials. Part E provides for the Council to forego any affordable housing contribution for developments of this type.

7.150 We will assess whether an affordable housing contribution should be sought for self-build or custom-build homes on a case-by-case basis. In accordance with Part B of Policy H4, we will not seek a contribution from schemes which involve less than 100 sqm GIA additional housing floorspace. Conversely, we will expect a contribution from development which fail to optimise the delivery of homes from the site in accordance with Policy H1. In particular, we will expect a contribution from homes which exceed the nationally described space standard (for the relevant number of bed spaces/ occupiers) by more than 50%, or involve a 250 sqm additional housing floorspace or more. To ensure that the development is genuinely intended to assist a specific self-builder or custom-builder, we will seek a planning obligation requiring a contribution if, within three years of completing the home, the self- or custom builder ceases to occupy the home as their principal residence. This arrangement is consistent with the arrangements in CIL Regulations for exemptions in relation to self-build housing.

7.151 Housing for people with care and support requirements, such as older people, may be included in developments as a component of the market housing, or as part of the affordable housing offer where the Council has sought this through Policy H4 Part B. In each case this type of housing is likely to have an impact on the viability of the development (e.g. in terms of whether the value of the homes is derived from sales or rentals, whether care is included as part of housing costs, and the extent to which there are common areas or support areas which do not directly add to development value). Furthermore, such housing may take the form of care homes, which are not generally subject to a requirement to contribute to a discrete element of affordable housing. Consequently, Part E provides flexibility for us to consider whether and how affordable housing should be sought in the light of the specific circumstances of each development involving housing for people with care or support requirements. Further guidance is also provided by Policy H8.

7.152 The character of the development and the size of the site (including the ability to accommodate additional entrances and circulation spaces) will influence whether it can accommodate a mix of market and affordable housing. Factors to be considered include whether existing buildings need to be retained on-site (e.g. heritage assets), whether dual-aspect homes and large homes of 3 or more bedrooms can be incorporated (particularly for low-cost rented housing), and the implications of anticipated service charges on the cost of affordable housing.

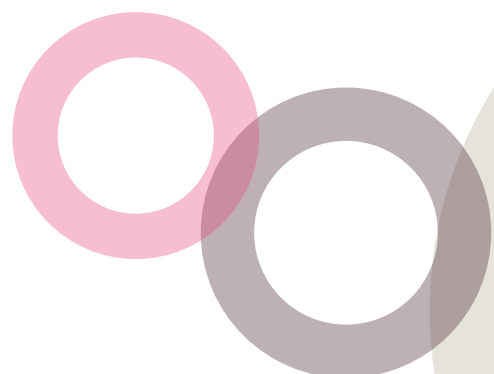
7.153 Most areas in the borough also have reasonably mixed and sustainable communities, and include an existing mix of market and affordable housing. However, there are some areas that have a very high proportion of market housing or low-cost rented housing, which may sometimes influence whether on-site or off-site affordable housing is most appropriate, and / or the most appropriate mix of affordable housing types.

7.154 In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability, including the availability of public subsidy, particular costs associated with the development (such as restoration of heritage assets and remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build to rent housing). Subject to the London Plan viability threshold approach, we will expect submission of a financial viability appraisal to justify the proportion of affordable housing proposed and demonstrate that the proposed affordable housing is deliverable, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. The Council will also seek funding from the developer for an independent verification of the appraisal.

7.155 Where financial viability constraints prevent the development from meeting the affordable housing target, and there is a prospect of viability improving prior to delivery, the Council will expect a viability review (or reviews) subject to the London Plan's viability threshold approach, and will seek an increased affordable housing contribution if viability improves over time. For schemes defined by the London Plan as viability tested schemes, the Council will expect a late stage viability review to take place when costs and receipts are known as far as possible. For schemes defined by the London Plan as fast track schemes, we will seek an early stage viability review at a specified period (usually two years after permission is granted). In the case of long-term schemes where phased implementation is anticipated, we may also seek mid-term viability reviews prior to implementation of later phases.

7.156 Where an early stage or mid-term viability review shows that viability has improved since permission was granted, we will seek additional affordable housing on-site in accordance with the London Plan. Where a late stage viability review shows that viability has improved, we will seek a further financial contribution to affordable housing, not exceeding the payment-in-lieu that would arise from the shortfall between the initial contribution and the affordable housing target. Our Camden Planning Guidance on housing provides more detailed guidance on viability review mechanisms, and developers will be expected to have due regard to this.

7.157 The Council will positively consider alternative approaches to delivering affordable housing as part of development. We will encourage proposals that can better maximise the supply of affordable housing while providing an appropriate mix of affordable housing types, for example by converting existing market housing into affordable housing. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver affordable housing e.g. the impact of including affordable business space for small and medium-sized enterprises (SMEs).





Protecting and improving affordable housing

7.158 Policy H5 seeks to protect all affordable housing floorspace in the broad sense of housing that is provided at less than market costs, whether the reduced cost arises from the nature of the homes, the occupants, or the providers, or a formal affordable housing designation.

7.159 It seeks to particularly protect:

- low-cost rented housing and intermediate housing managed by the Council, Housing Associations and other Registered Providers;
- key-worker accommodation, such as nurses' homes and hostels; and
- other low-cost housing provided in connection with a job, such as a caretaker's flat.

7.160 Other policies in this section also provide more specific provisions protecting particular types of housing as follows:

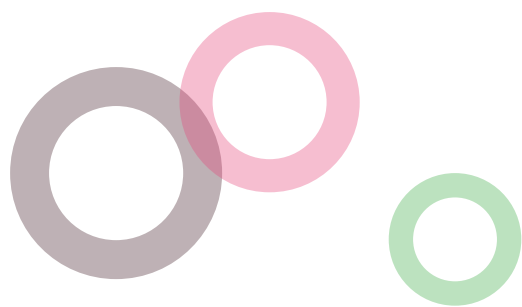
- housing for older people, homeless people and other people with care or support requirements is protected by Policy H8;
- student housing (known as purpose-built student accommodation) is protected by Policy H9;
- other housing where occupiers do not live as a family but are long-term residents sharing some rooms and / or facilities (larger houses in multiple occupation or HMOs, and large-scale purpose-built shared living) is protected by Policy H10.

7.161 Losses of affordable housing may not always be subject to planning control, for example where the housing is ancillary to another primary use (e.g. a nurses' home provided as part of a hospital), and no change is proposed to the primary use.

Policy H5

Protecting and improving affordable housing

- A.** The Council will aim to protect, improve and increase the existing stock of affordable housing in Camden, and to maintain and improve the mix of affordable housing types and sizes.
 - B.** The Council will resist development that would involve a net loss of any type of affordable housing floorspace.
 - C.** The Council will work to regenerate existing estates and provide more and better affordable homes through the Community Investment Programme and Better Homes Programme.
 - D.** We will consider estate regeneration proposals following the approach set out in the London Plan, expecting the retention or replacement of all existing affordable housing in terms of floorspace and / or habitable rooms (including all existing low-cost rented housing) and expecting the maximum viable addition to affordable housing in terms of floorspace and / or habitable rooms, having regard to the guideline mix of affordable housing types in Policy H4 (Maximising the supply of affordable housing).
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Loss of affordable housing

7.162 As indicated in Policy H4 (Maximising the supply of affordable housing), Camden has a particularly large requirement for additional affordable homes. However, the number of households living in social rented homes in the borough fell by around 3,000 between the 2001 Census and 2021 Census, widening that gap between need and supply. In the last 25 years there has also been a reduction in the amount of housing provided for nurses and other health service workers. The Council therefore protects existing affordable housing against further losses.

7.163 The existing stock of social rented housing is heavily skewed to 1 or 2-bedroom homes, and overcrowding in the existing stock creates a compelling need for an additional supply of large affordable homes with 3 or more bedrooms. Older accommodation for health service workers often has shared facilities such as kitchens and bathrooms, whereas contemporary demand from key workers is for self-contained accommodation. To take account of this mismatch between supply and demand, the Council seeks to protect affordable housing floorspace rather than each individual affordable home, and will support proposals that adapt affordable homes to fit contemporary and future needs, for example by amalgamating small flats. Where such adaptations take place, the Council will seek to ensure that arrangements are in place to re-house all existing occupiers.

7.164 Redevelopment of affordable housing should generally provide new low-cost rented housing to replace existing low-cost rented homes, and new intermediate affordable housing to replace existing intermediate homes. Where the existing housing is for key workers or provided in connection with a job, redevelopment should provide for the same group of occupiers unless their needs have been met elsewhere, in which case low-cost rented housing and intermediate housing will be sought. The Council will consider the mix of replacement affordable housing types flexibly, and seek to address mismatches between supply and demand, having regard to Policy H4 (Maximising the supply of affordable housing). The Council will also be flexible in considering replacement affordable housing on an alternative site in the same area provided that the replacement housing will contribute to creating mixed, inclusive and sustainable communities.

7.165 Housing and affordable housing required in association with Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes), and Policy H4 (Maximising the supply of affordable housing), should be provided in addition to any retained or replacement affordable housing arising under Policy H5, subject to the particular arrangements for estate regeneration set out in the London Plan and Local Plan Policy H5.

Camden's Community Investment Programme (CIP) and estate regeneration

7.166 The Council launched its Community Investment Programme (CIP) in 2010 to provide new and improved schools, homes and community facilities despite huge cuts in government funding. CIP involves refurbishment of some parts of Council estates, and redevelopment in other parts. It aims to ensure that Council tenants live in good quality accommodation that meets contemporary standards. It also aims to deliver wider benefits by tackling health inequality, helping local residents to take advantage of employment opportunities, and making our communities more sustainable and resilient. Alongside CIP, the Council is also progressing a "Better Homes" programme, which refurbishes existing Council homes.

7.167 By 2022, with the planned CIP works to schools largely complete, the Council decided to expand the Community Investment Programme and refocus on delivery of affordable housing. Over the lifetime of CIP, the Council proposes to deliver 4,850 new homes, of which 1,800 will be new or replacement Council homes, and 350 will be new intermediate homes for rent. Sites identified for CIP estate regeneration proposals are generally allocated in this Plan where they have been subject to local consultation and a formal decision has been made to design a scheme.

7.168 The 2021 Census found that over 10% of Camden's households were renting affordable housing from providers other than the Council (primarily Housing Associations). A number of these providers have a substantial stock of affordable housing in Camden, and have the potential to bring forward their own estate regeneration schemes. Two site allocations in this plan relate to estates of non-Council affordable housing where the provider has advised us that they wish to bring forward regeneration proposals.

7.169 The purpose of estate regeneration is to improve housing conditions and quality of life for existing residents, as well as providing additional homes where possible. Unless additional market homes are provided, substantial costs will arise from refurbishing or replacing homes without any substantial return in terms of additional rents or sales. Consequently, the London Plan recognises that all estate regeneration should be subject to viability testing to determine how much additional affordable housing can be provided. The Council supports this approach, and will not apply the affordable housing targets in Policy H4 to estate regeneration schemes. We will assess the re provision of existing affordable housing and the provision of additional affordable housing in terms of floorspace and/ or habitable rooms in accordance with the measurement arrangements set out in association with Local Plan Policy H4.

7.170 The Community Investment Programme is a long-term strategy, and will involve relocating some occupiers while their homes are refurbished or redeveloped. Over the course of the programme, there may be redistribution of occupiers and of affordable housing floorspace from one part of an estate to another, or even from one estate to another. The Council will take a strategic approach to estate regeneration, taking into account the potential to attract investment and the benefits of creating mixed and inclusive communities. We will resist the loss of affordable housing floorspace across the programme as a whole, but may not resist localised or short-term losses provided a strategy is in place to ensure their replacement.





Housing choice and mix

7.171 The Council aims to achieve mixed, inclusive, sustainable and multi-generational communities in Camden by seeking a range of housing types suitable for households and individuals with different needs.

7.172 Seeking a range of housing types, sizes, accessibility and affordability will help us deliver the Council's missions set out in We Make Camden to meet the needs of Camden's diverse communities by tackling inequality, addressing overcrowding, creating sustainable and resilient neighbourhoods, improving health and wellbeing, and securing a supply of housing suitable for individuals and families on low and middle incomes. As discussed in the paragraphs following Policy H1 (Maximising Housing Supply), the Council also recognises that diversity of housing supply will help us to maximise housing delivery.

7.173 We will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet general and particular needs. Given the limited size and high value of development sites in the borough, it will be challenging to deliver some of the housing types needed in Camden, particularly serviced plots for self-build housing and pitches for Camden's traveller community. Consequently, where larger sites (0.5 ha or greater) do come forward, we will seek the inclusion of provision for particular housing needs, including the needs of self-builders, taking into account the characteristics and constraints of the site and area.

Policy H6

Housing Choice and Mix

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- A.** The Council will aim to minimise social polarisation and create mixed, inclusive, sustainable and multi-generational communities by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs.
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- B.** When negotiating the types of housing included in developments in Camden, we will:
1. apply all relevant elements of design policies and guidance associated with the London Plan and the Local Plan, including Local Plan Policy D3 (Design of Housing);
 2. expect all new housing to be accessible, and expect new-build self-contained housing to meet the specific requirements of Parts M4(2) or M4(3) of the Building Regulations in accordance with Policy D3 (Design of Housing);
 3. require self-contained housing to include a range of dwelling sizes in accordance with Policy H7 (Large and small homes);
 4. seek provision of the types of housing appropriate to meet the particular needs identified by Policies H8 (Housing for people with care or support requirements), H9 (Purpose-built student accommodation), and H11 (Accommodation for travellers);
 5. seek a diverse range of housing products in the market and affordable sectors to meet the needs across the spectrum of household incomes;
 6. support build to rent developments where this will assist the creation of mixed, inclusive and sustainable communities and comply with all relevant Local Plan policies, including Policy H4 (Maximising the supply of affordable housing), particularly the encouragement in Part D to provide affordable housing in accordance with our guideline mix of 60% low-cost rented housing (homes for Social Rent or London Affordable Rent) and 40% intermediate housing;
 7. seek provision suitable for service families and people wishing to commission or build their own homes; and
 8. support the creation of additional residential moorings in conjunction with the development of sites adjacent to the Regent's Canal where this is consistent with optimising the use and development potential of the site, the protection and enhancement of the Canal's biodiversity and nature conservation value, the Canal's open space designation, the historic interest and character of the Regent's Canal Conservation Area, and the London Mooring Strategy.
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Policy H6

Housing Choice and Mix

- C. Where housing is proposed as part of development with a site area of 0.5 ha or greater, we will seek the inclusion of provision for particular housing needs. For such sites, the Council will particularly seek to address the need for serviced plots available to people wishing to commission or build their own homes, but may also support the inclusion of other types of housing to meet the needs identified in Part B. In considering the scale and nature of provision for particular housing needs that would be appropriate, the Council will take into account:
1. criteria in Policies H8, H9, H10 and H11 where applicable;
 2. the character and size of the development, and any constraints on developing the site for a mix of housing types including provision for particular housing needs;
 3. the impact on creation of mixed, inclusive and sustainable communities;
 4. the impact of provision for particular housing needs on the efficiency and overall quantum of development;
 5. the economics and financial viability of the development, including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build to rent housing, and any recommendations of an independent viability assessor commissioned to advise the Council; and
 6. whether an alternative approach could better meet the objectives of this policy and the Local Plan.
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Design and accessibility

7.174 All housing developments coming forward in Camden should meet the requirements of the design policies in the London Plan and the Local Plan, and follow the design guidance associated with them. In particular, Local Plan Policy D3 expects all housing development to create high quality accessible homes. Policy D3 also sets specific accessibility requirements for new build self-contained homes, expecting 10% to be 'wheelchair user' dwellings' and the remaining 90% to be 'accessible and adaptable dwellings'. Accessible homes can support changing needs arising through a family's life cycle, incorporating features to help accommodate pregnancy, prams and pushchairs, injury, and old age, as well as meeting the needs of people with mobility disabilities.

Mix of dwelling sizes

7.175 All developments of self-contained homes are expected to provide a range of dwelling sizes in accordance with Policy H7 (Large and small homes), including some large homes with 3 bedrooms or more, and some smaller homes. The provision of a range of dwelling sizes in each development will provide homes suitable for single people, families with dependent children, and couples without dependent children and help us to foster inclusive and multi-generational communities where residents are able to support their neighbours.

Meeting the particular housing needs of different groups

7.176 The National Planning Policy Framework (NPPF) indicates that planning policies should reflect the housing needs of a range of different groups, including: those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes; and people wishing to commission or build their own homes. The following paragraphs set out how the Plan seeks to address these needs.

7.177 The needs of those who require affordable housing (including homes for Social Rent, as well as homes for London Affordable Rent and intermediate housing) are addressed by Policy H4 (Maximising the supply of affordable housing). Policy H7 (Large and small homes) seeks to address the needs of families with children (including looked after children who are in foster care), as well as the needs of other household types, such as single people and couples without dependent children. Where people have mobility disabilities (including people who use wheelchairs) but do not require on-site care or support, we aim to meet their needs by applying the requirements for accessible housing in Policy D3 (Design of Housing).

7.178 The particular housing needs of a number of the groups identified in the NPPF are addressed by specific policies in the Plan:

- Policy H8 (Housing for older people, homeless people and other people with care or support requirements) seeks to address the housing needs of looked after children (where they are not supported by foster care in a family home), older people (including those who require retirement housing, housing-with-care, and care homes), and disabled people who require on-site care or support, as well as the needs of a number of other groups with care or support requirements;
- Policy H9 (Purpose-built student accommodation) addresses the housing needed for students; and
- Policy H11 (Accommodation for Travellers) addresses the housing needs of gypsies and travellers and travelling showpeople.

7.179 Policy H6 also includes provision for people who rent their homes, service families and people wishing to commission or build their own homes. In addition, Policy H6 responds to the requirement of the Housing Act 2004 (as amended) that local housing authorities should consider the accommodation needs of people residing in houseboats moored on inland waterways. Subsequent paragraphs provide more details about how we will consider provision for each of these groups.

7.180 The Council will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet the general and particular needs of existing and future households. We will consider all the needs identified by Policy H6, including those addressed in detail by Policies H7, H8, H9 and H11. We note that Part B of Policy H6 does not seek to promote the provision of housing with shared facilities (including large-scale purpose-built shared living), which is not a form of accommodation addressed by the NPPF 2024. The Council will support the development of such accommodation where it complies Policy H10 (Housing with shared facilities) having regard to criteria in Part C of Policy H6.

Diversity of housing supply to meet a range of incomes

7.181 The provision of affordable housing (low-cost rent and intermediate housing) and market housing (to rent and to buy) at costs prevailing in the borough will not be sufficient to meet needs across the full range of household incomes of those wishing to live in Camden. There are substantial gaps between the cost of affordable housing (particularly low-cost rent, but also intermediate rented housing) and the cheapest private rents (the lower-quartile), and between the cost of the cheapest private rents and the cost of entering the market for owner-occupation. Local housing allowance (the benefit provided to help with cost of renting) is often insufficient to cover the full cost of privately rented housing.

7.182 These gaps are particularly wide in the case of large homes (with 3 or more bedrooms), with middle-income households (particularly those with children) increasingly squeezed out of Camden due to high housing costs. This leads to social polarisation between lower income households in low-cost rented housing (homes for Social Rent or London Affordable Rent) and higher income households in owner occupation, which is only partly offset by the private rented sector and the modest supply of intermediate housing in the borough. This situation is reflected in changes to the numbers of households of different types over the Plan period projected by our Local Housing Needs Assessment, with the growth focussed on single person households, couples without children, and 'other households' (defined as multi-person households including unrelated adults sharing, student households, multi-family households, and households of one family and other unrelated adults).

7.183 By increasing the diversity of housing types available in the borough, such as adding to the supply of build to rent housing and purpose-built student accommodation, the Council seeks to provide additional options for households currently competing for the existing stock of private rented housing. By providing alternative housing options for people who would otherwise share a home with other students or unrelated adults, the Council aims to free up relatively low-cost market housing suitable for families with dependent children. Whilst build to rent housing and purpose-built student accommodation tends to be more expensive than lower-quartile rents in the existing private rented stock, they may reduce the competition for existing market homes to rent, and so alleviate the upwards pressure on rents.

Build to rent development and private rented homes

7.184 The private rented sector is currently the largest source of housing for people who are unable to access affordable housing and cannot afford to buy. Private renting is thought to play a significant role in limiting social polarisation in the borough, and the Council will seek to actively foster the sector and support private tenancies for people in housing need.

7.185 The National Planning Policy Framework and the London Plan promote building homes specifically for private rent (build to rent). This is a relatively new housing product, where homes are generally provided at a large scale and managed by a single commercial provider. We consider that build to rent development could potentially help to increase overall housing output in Camden, and could also help to reduce the pressure for occupation of family homes by groups of unrelated adults. However, the turnover of occupiers of private rented housing tends to be rapid (particularly given its popularity amongst young adults and students), so localised concentrations could potentially harm the stability and sustainability of a community.

7.186 Build to rent development may well attract less interest from families than development for market sale, and a different mix of dwelling sizes may be appropriate. Financial viability is viewed differently for build to rent development (compared with developments built for sale) because returns are realised over a longer period, and this may mean that the appropriate level of affordable housing provision is lower. The Council will be flexible in the application of affordable housing and dwelling size policies to development of build to rent housing where we consider such housing will help to create mixed, inclusive and sustainable communities. We consider that build to rent has the best potential to contribute to a sustainable community where leases are available to occupiers for longer periods such as 2-5 years and a long-term commitment is in place to secure the management of the private housing element as rented accommodation. To address the form of leases available, ensure a long-term commitment to private rent, and otherwise secure high quality build to rent development, the Council will apply all relevant London Plan provisions for this sector, but will strongly encourage contributions of on-site affordable housing (low-cost rented housing and intermediate housing) in accordance with the guideline mix set out in Policy H4.

7.187 As indicated in association with Policy H4, the London Plan provides for the affordable housing contribution from build to rent housing to take the form of homes for Discount Market Rent. The London Plan seeks the provision of homes for Discount Market Rent in the form of a specific intermediate housing product known as London Living Rent, and aims for at least 30% of the homes for Discount Market Rent to be let at London Living Rents. As set out in the paragraph above and in Policy H4 Part D, the Council strongly encourages an affordable housing contribution from build to rent housing in accordance with the guideline mix of low-cost rented housing and intermediate housing, but as an alternative will apply the distinctive affordable housing provisions of the London Plan, including the provisions for homes for Discount Market Rent.

7.188 Where a developer opts to provide affordable housing in the form of homes for Discount Market Rent and London Living Rent, the Council will expect the homes for London Living Rent to be made available to households on our Intermediate Housing Register of Interest, in accordance with the Council's Intermediate Housing Strategy. The Council may also seek to negotiate nominations to a proportion of the homes for London Living Rent. Nominations would be of single people or households with an acknowledged housing need, potentially including people accepted by the Council as homeless, people in temporary accommodation and care-experienced young adults.

Service families

7.189 The National Planning Policy Framework (NPPF) indicates that councils should plan for a mix of housing to meet the needs of various groups including the needs of service families. The government has made a number of commitments regarding housing members of the armed forces, including a requirement for councils to give additional preference to seriously injured service personnel who have urgent housing needs, referral schemes with a number of housing associations, tailored low-cost home ownership schemes and assistance for necessary adaptations for injured service people.

7.190 The Regent's Park Barracks occupy a site in the South sub-area of the borough, and are understood to be home to a number of Camden's service personnel. Council Tax records indicate that there are 15 flats on the site and 1 property with a combined residential and non-residential use. Where the housing needs of members of the armed forces and their families are not met by forces accommodation, we consider that their needs can be met by giving them appropriate priority in the allocation of the housing intended to meet the needs of the wider community. Camden's Local Plan policies seek provision of affordable housing, including low-cost rented housing and intermediate housing, and also seek housing to suit people with mobility disabilities and other care or support requirements. Through the housing allocation scheme for low-cost rented homes, the Council gives additional preference to current and former members of the armed forces with a recognised housing need. The Council has also included service families in its priority list for intermediate housing.

People wishing to commission or build their own homes

7.191 The NPPF indicates that councils should plan to meet the needs of people wishing to commission or build their own homes (also referred to as self build and custom housebuilding). Typically, people from this group seek to acquire a serviced plot of land for construction of the home they will occupy. Self-build generally refers to people who bring their own building skills to bear as part of the construction process, whereas custom-build more often involves people who can provide professional services such as architecture or project management. In some cases custom-build can simply involve people who commission professionals to build a bespoke home to personal specifications rather than a speculative home built to a standard design.

7.192 Land costs in Camden are extremely high and the majority of housing output takes the form of flats built at relatively high densities. Consequently, the potential for people to acquire a site and use their own building skills to provide low-cost homes is very limited. However, there is some evidence to suggest that custom-build for wealthier households is quite common in northern parts of the borough with a more suburban character. This sometimes involves infill sites and sometimes redevelopment of an existing residential plot. There may also be some interest in group self-build involving Council-owned land, possibly in association with the Community Investment Programme.

7.193 The Self Build and Custom Housing Building Act 2015 (as amended) requires councils to create and publicise a register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. Camden's register is divided into Part 1 (comprising individuals and households who are longstanding residents of the borough) and Part 2 (comprising those recently resident elsewhere). In February 2025, there were 5 individuals or households registered on Part 1 and 2 individuals or households registered on Part 2. At that time, there were no associations on the register.

7.194 Through the Housing and Planning Act 2016, councils are required to give permission for enough serviced plots to meet the demand for self-build and custom-build homes indicated by Part 1 of the register. The Act also provides a mechanism for councils to seek an exemption from this requirement. On the basis of Community Infrastructure Levy data, we are aware that self-build relief is given each year for a small number of newly permitted homes, some involving replacement of an existing dwelling, and others involving infill between existing homes.

7.195 There are no large areas of unused, underused or cleared land in Camden that would provide an immediate opportunity to create serviced plots. Furthermore, self-build and custom-build housing are likely to involve low density development, which would make it very hard for a prospective self-builder to compete with other developers to acquire land, and would also represent an underuse of land in many parts of Camden, in conflict with Policy H1 (Maximising housing supply) and London Plan policies relating to good growth and design. Given these constraints, beyond opportunities arising from individual infill plots (generally too small to be included in the Plan as allocated sites), the Council considers that the best prospect for bringing forward suitable land will be in conjunction with the development of a large site involving other types of housing, and has made provision in Policy H6 for development of sites of 0.5 ha or greater to include serviced plots for self-build and custom-build.

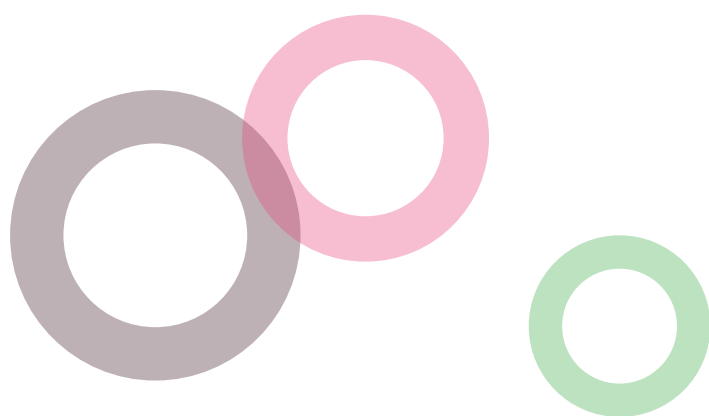
Residential moorings

7.196 The Housing Act 2004 (as amended) requires local authorities to consider the accommodation needs of people residing in houseboats moored on inland waterways. Camden's only navigable waterway is the Regent's Canal, which traverses the Central and South sub-areas of the borough from Regent's Park to King's Cross. The Regent's Canal is a metropolitan site of importance for nature conservation (SINC), is a designated open space, and is also at the heart of the Regent's Canal Conservation Area. Both the SINC and the open space include the towpath and some further elements of the banks (although the areas designated are not identical), whilst the Conservation Area extends more widely to include other parts of the Canal's historic context.

7.197 On the basis of data from the Valuation Office Agency, we understand there are fewer than five permanent residential moorings in the borough, split between Granary Moorings (to the east of St Pancras Hospital, Allocation S8), and the Cumberland Basin adjacent to Regent's Park. The only other basin in Camden is adjacent the Midland Main Line railway at Camley Street. This facility is operated by the St Pancras Cruising Club, and provides non-residential moorings only.

7.198 The Canal and River Trust is a charity which maintains canals and navigable rivers in England and Wales. In 2018, the Trust published the London Mooring Strategy to manage growth in the number of boats moored in London's waterways. Overall, the strategy seeks to relieve pressure on moorings in busier parts of the network such as the Regent's Canal by creating short-stay visitor moorings and increasing the monitoring and management of existing moorings, whilst indicating that there is greater potential for additional moorings in quieter parts of the network such as the Grand Union. The strategy also identifies potential to reinstate long-term moorings on the bank opposite the towpath and adjacent to Goods Way at King's Cross.

7.199 Part B8 of Policy H6 seeks to achieve an appropriate balance between the aspiration for additional residential moorings, maintaining the Canal's value from an open space, biodiversity and historical perspective, and ensuring that waterside land is used efficiently. In applying the policy, the Council will seek to ensure that housing delivery is optimised on waterside sites in accordance with Policy H1, and the overall number of homes provided is not compromised in order to deliver a modest addition to the supply of residential moorings.



Achieving an appropriate range of housing types to address diverse needs

7.200 For sites with an area of 0.5 ha or greater, criteria in Policy H6 Part set out the factors the Council will consider in determining whether to seek the inclusion of serviced plots available to people wishing to commission or build their own homes, and whether to encourage or support the inclusion of homes suitable to address any other particular needs. The first criterion notes the Local Plan's specific policies addressing housing for people with care or support requirements, purpose-built student accommodation, housing with shared facilities including large-scale purpose-built shared living, and accommodation for travellers. The remaining five criteria are essentially the same as the final five criteria employed in Policy H4 Part E, and which help us in that context to consider how developments can best contribute to the provision of affordable housing.

7.201 The criteria are explained in detail in the paragraphs supporting Policy H4, so their content is not repeated here. However, there are a number of factors that may be particularly relevant to homes intended to meet particular needs, including:

- whether housing to meet any particular housing need or needs can be effectively incorporated and managed in the context of the wider development proposed;
- whether the area around the development currently has a shortfall in housing to meet any particular housing need or needs, or has sufficient and appropriate provision to meet anticipated requirements across the Plan period;
- whether the introduction of housing to meet any particular housing need or needs would cause undue harm to the density of development and the optimisation of housing delivery on the site;
- whether the viability characteristics of housing to meet any particular housing need or needs are compatible with the viability characteristics of the wider development and the overall financial viability of developing the site; and
- whether the development can more effectively contribute to meeting particular housing needs through an alternative approach (rather than delivering suitable housing to meet those needs on-site).





Large and small homes

7.202 Policy H7 seeks to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce the imbalance between housing needs and existing supply.

7.203 Policy H7 (Large and small homes) seeks a mix of dwelling sizes where the following types of housing are proposed:

- self-contained houses and flats (Use Class C3);
- 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, in Use Class C4, but can change to Use Class C3 without a planning application under the freedom provided in legislation); and
- live / work units, which are self-contained homes that include a dedicated work area (not in any planning use class, but we will treat them as Use Class C3 when we apply Local Plan policies).

7.204 Policy H7 applies wherever there is development that affects the mix of dwelling sizes for these housing types, whether the development involves construction of new buildings, extensions, alterations, conversions or changes of use, or includes the creation of separate homes from ancillary residential accommodation.

7.205 Policy H7 does not apply to development intended to meet the particular needs addressed by Policies H8, H9, H10 and H11, such as housing for older people and purpose built student accommodation.

Policy H7

Large and small homes

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- A.** The Council will aim to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce the imbalance between housing needs and existing supply.
-
- B.** The Council will seek to ensure that all housing development including the conversion of existing homes and non-residential properties:
1. includes a mix of large homes (homes with three bedrooms or more) and small homes (studio flats, 1-bedroom and 2-bedroom homes); and
 2. contributes to meeting the Dwelling Size Priorities set out in Table 9 below.
-
- C.** The Council will seek to maintain and augment the stock of market homes with three bedrooms by:
1. resisting the loss of three-bedroom market homes from development involving existing housing, particularly where the homes have direct access to external amenity space; and
 2. expecting provision of at least one three-bedroom home from development that sub-divides an existing large home (with three bedrooms or more).
-
- D.** The Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, where the applicant can justify this having regard to:
1. the distinct Dwelling Size Priorities for each tenure set out in Table 9 below;
 2. any evidence that borough-wide priorities differ from needs in a particular area or the needs relating to a particular sector such as build to rent development;
 3. the existing mix of dwelling sizes in the area, and the impact of large homes on child density;
 4. the character and size of the development, and any constraints on developing the site for a mix of homes of different sizes;
 5. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build to rent development, and any recommendations of an independent viability assessor commissioned to advise the Council; and
 6. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.
-

7.206 Camden's Local Housing Needs Assessment calculates the likely requirement for homes of different sizes in different tenures based on the projected household composition over the Plan period, projected household incomes, and the size/ tenure of dwelling that each household type would require. It indicates that the greatest requirement for market housing is likely to be for 3 bedroom homes followed by 1 bedroom homes. The greatest requirement for low-cost rented housing (homes for Social Rent and London Affordable Rent) is likely to be for 3 bedroom homes followed by both 2 bedroom homes and homes with 4 bedrooms or more.

7.207 The Dwelling Size Priorities in Table 9 have been guided by the outputs of the Local Housing Needs Assessment and evidence from Camden's Housing Register (waiting list) and Intermediate Housing Register of Interest, considered alongside the mismatch between the need for large affordable homes (indicated by overcrowding) and supply (indicated by average number of bedrooms per household), the cost constraints on delivering large intermediate homes, the priorities included in the Camden Local Plan 2017, and the potential for households to be displaced into rented market housing by the undersupply of intermediate housing. Dwelling sizes are expressed in terms of number of bedrooms and distinct priorities are identified for market housing, intermediate housing, and low-cost rented housing (homes for Social Rent or London Affordable Rent).

7.208 The Council acknowledges that there is a need and / or demand for dwellings of every size shown in Table 9: Dwelling Size Priorities. The Council expects most developments to include some homes that have been given a medium or lower priority level. However, we have prioritised some sizes as high priority (primarily based on a high level of need relative to supply). The Council will expect proposals to include some dwellings that meet the high priorities wherever it is practicable to do so. For low-cost rented housing we will give particular priority to large homes (with three or more bedrooms).

Table 9 | Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Low-cost rented	lower	medium	high	medium
Intermediate affordable	high	medium	lower	lower
Market	high	medium	high	lower

7.209 The Council recognises that it will not be appropriate for every development to focus on the higher priorities in the Dwelling Size Priorities Table, and will consider the mix of sizes in each development having regard to the criteria in Part D of Policy H7. However, we consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall, in accordance with the first criterion in Part B. Where possible a mix of large and small homes should be included for both the affordable housing and the market housing. To assist the creation of mixed, inclusive and sustainable communities and accord with the first criterion in Part B, the Council will generally resist development proposals for self-contained general needs housing that contain only one-bedroom and studio flats.

7.210 The Camden Planning Guidance on housing (2021) indicates that the Council will aim for at least 50% of low-cost rented dwellings in each scheme to be large homes (3 bedrooms or more), and on the basis of mismatches in the existing stock we expect to retain this aim.

Market homes with three bedrooms

7.211 Camden's Local Housing Needs Assessment indicates that a substantial proportion of the households needing market housing over the Plan period are expected to require 3 bedroom homes. The Needs Assessment also suggests that there is likely to be a significant number of households that need 3 bedroom homes but are unable to access affordable housing and unable to afford market housing to rent or buy. In addition, the Needs Assessment confirms that new-build housing is generally more expensive than existing housing. Consequently, the Council will aim to maintain and add to the number of 3 bedroom market homes within the existing housing stock.

7.212 Where development relates to existing housing (or ancillary residential floorspace), the Council will resist the loss of market homes with 3 bedrooms in accordance with Part C of Policy H7. We will also apply Policy H3 to limit the net loss of homes. Where development would involve conversion of a large home to create additional smaller homes, the Council will expect the converted property to include at least one 3 bedroom home in accordance with Part C of Policy H7. To support families with children, we will particularly resist the loss of 3 bedroom market homes that have direct access to external amenity space, and strongly encourage the provision of external amenity space for new 3 bedroom homes created through conversions.

Flexibility in assessing the mix of dwelling sizes for different tenures

7.213 The Council will be flexible when assessing development against Policy H7 and Table 9: Dwelling Size Priorities. The mix of dwelling sizes appropriate in a specific development will be considered taking into account any distinctive characteristics of the area (in terms of the dwelling sizes needed or already present), and the character and size of the development. The following paragraphs set out a number of the relevant considerations. Please see our Camden Planning Guidance on housing for further details.

7.214 For low-cost rented housing (homes for Social Rent and London Affordable Rent), our high priority need is for large homes with 3 bedrooms. For intermediate housing, only small homes are prioritised. For market homes, there are high priorities amongst small and large homes. Where the characteristics of a development make it impractical to achieve a mix of large and small homes amongst both the affordable housing and the market housing, it may be appropriate to achieve an overall mix by providing low-cost rented housing in the form of large homes and providing market housing in the form of small homes.

Characteristics of the area and consideration of child density

7.215 Our Dwelling Size Priorities have been set considering housing needs and supply across the borough as a whole. It will be appropriate to apply this in most locations as the housing market is generally considered to extend beyond borough boundaries (the Camden Housing Market Assessment 2016 suggested a single market encompassed Camden, Islington, and parts of Brent and Barnet), and the Camden Housing Register and Intermediate Housing Register of Interest operate on a borough-wide basis.

7.216 Nevertheless, there may be circumstances where evidence of local needs and the existing mix of dwelling sizes in the area should be taken into account. This is likely to be the case for estate regeneration proposals, where it may be necessary to accommodate the particular needs of tenants and leaseholders already living on the estate. In addition, the 2021 Census found that the proportion of households living in homes with 3 or more bedrooms was significantly lower in four Camden wards than across the borough. In those four wards (Bloomsbury, Holborn and Covent Garden, Kilburn, and King's Cross), the Council will particularly seek to deliver additional large homes, subject to the other criteria in Part D.

7.217 The 2021 Census indicated that over a third of Camden's households were living in privately rented homes, more than were owner-occupiers. Camden's Local Housing Needs Assessment takes account of the needs of private renters as well as buyers in considering of the need for market homes. However, the Local Housing Needs Assessment indicates that build to rent homes typically cost more than median rents found across the wider market rented sector. Accordingly, the needs best met by build to rent developments may differ from our priority needs for market housing (to rent or buy), and the Council will consider any evidence submitted in relation to the households seeking accommodation in the build to rent sector.

7.218 When considering the proportion of larger homes, we will have regard to the needs of families with children, and also the flexibility that larger dwellings create for a variety of other household types, allowing for arrangements such as households sharing, or a household caring for elderly or infirm relatives. The Council will take account of any features that make the development particularly suitable for families with children. Child-friendly features include:

- the potential to provide space on site where children can play (open space or private amenity space);
- dedicated children's play space available nearby;
- a number of homes with direct access to the street, external private amenity space or open space;
- no direct access to a major road;
- a limited number of homes served from each internal corridor and each communal staircase or lift; and
- potential to provide a broad range of dwelling sizes in the development appropriate for new families with very young children and established families with older children.

7.219 There are relatively few opportunities in Camden for housing development that will provide more than one or two of these features. Where a number of these features are present, we will expect the inclusion large homes, and particularly seek the inclusion of large low-cost rented homes. The Council does not consider that the absence of any or all of these features would justify the omission of large homes from a development, unless other criteria in Policy H7 would also support their omission.

7.220 The inclusion of a high proportion of large homes in a development can create high child densities, particularly a high proportion of large low-cost rented homes. High child densities can cause difficulties in some circumstances, typically where large numbers of children in the same age-group are growing up in a single block or in a location with limited safe external recreation space. The Council will take account of existing child densities in an area and the likely child density of the proposals and consider whether mechanisms such as a sensitive lettings policy should be used to manage child density, or whether a relatively low proportion of large homes would be appropriate.

Character and size of the development

7.221 Flexibility may be needed in the application of Policy H7 where the development concerned is small, or involves conversion of an existing building. Having regard to the aim in Policy H1 to optimise the homes delivered on each site, the most appropriate outcome for some small sites may be development focussed on a single dwelling size. In addition, any on-site target for affordable housing may be too limited to support an independent affordable housing core, or the inclusion of both low-cost rented housing and intermediate housing. In such cases, we will prioritise the inclusion of low-cost rented housing with direct street access, ideally including a large home or homes, or otherwise two-bedroom homes suitable for four occupiers.

7.222 Flexibility around dwelling sizes may also be required to achieve a rational layout and the best possible accessibility arrangements. Adjustments to the mix may be appropriate to satisfy design and amenity concerns, such as minimising noise disturbance between flats – see also Chapter 12 of the Plan on design and heritage. Considerations include ease of access to stair and lift cores, corridor length, the floor area taken up by circulation space, and the stacking of flats to avoid conflict between living areas and sleeping areas.

7.223 Where a development involves reuse of an existing building, this may limit the potential to provide a range of dwelling sizes. Issues that can arise include the creation of access via an existing staircase or lift, consideration of the integrity of existing structural walls and patterns of windows, changes in floor level, and significant features in heritage assets (including listed buildings and conservation areas) that may restrict alterations.

7.224 Whilst acknowledging that the re-use of existing buildings can impose some limits in the range of dwelling sizes that can be achieved, that Council will apply Policy H7 and the Dwelling Size Priorities set out in Table 9 as far as possible. We will particularly scrutinise proposals for development that involves reconfiguring existing housing (including the creation of separate homes from residential floorspace that is ancillary to another use) to ensure that they improve the range of homes on site to achieve a closer fit to our Dwelling Size Priorities. Where development relates to existing affordable housing, we will expect retention or re-provision of any existing large affordable homes unless the creation of small homes will allow the release of other large affordable homes that are currently under-occupied.

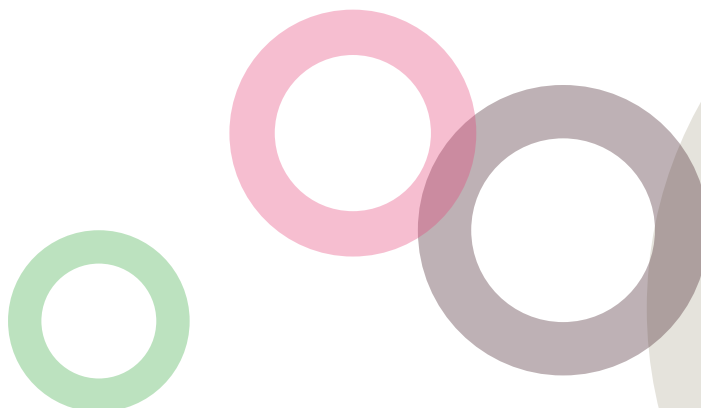
7.225 The Council is working to return vacant properties to use, particularly those vacant for several years. We will use the flexibility in Policy H7 to ensure that any features of the layout which limit the introduction of large homes do not prevent empty properties from returning to use, particularly upper floors above commercial premises.

Financial viability, demand, and the delivery of affordable housing

7.226 As indicated in the paragraphs supporting Policy H1, the Council intends to be flexible in pursuit of its policy objectives, and will take into account the findings of our monitoring of housing supply in the light of economic circumstances. The Council may vary the range of home sizes sought in order to maximise housing delivery.

7.227 Large affordable homes are expensive to build relative to their rental value and are challenging to provide even where grant funding is available, but they are a high priority for the Council and the London Plan. The demand for market homes of different sizes can vary across the borough and change quite rapidly, so that small homes generate higher values per square metre in some circumstances, and large homes generate higher values per square metre in others. The Council recognises that the rigid application of the Dwelling Size Priorities in Table 9 could prejudice the financial viability of a development, and will consider adjusting the mix of dwellings (particularly the mix of market dwellings) in order to maximise the proportion of affordable housing included in each development.

7.228 The Council may support development that exceeds our strategic affordable housing target and provides affordable homes that are a suitable size to meet the needs of a particular group, e.g. intermediate housing designed to provide discount home ownership for first time buyers. When considering such proposals we will operate Policy H7 flexibly having regard to the needs and financial resources of the intended occupiers.





Housing for older people, homeless people and other people with care or support requirements

7.229 Policy H8 relates primarily to housing made available specifically for occupation by older people (people who are approaching pensionable age or have reached it, typically aged 55 years or older) and housing made available specifically for occupation by homeless people or other people with care or support requirements, who need varying levels of support to enable them to live safely and securely.

7.230 In addition, part B of Policy H8 encourages adaptation of homes occupied by older people or other people with care or support requirements to help them remain in their own homes.

7.231 The term 'other people with care or support requirements' refers to a very broad group of people who require some kind of support with their living arrangements. Examples include people using mental health services, people with learning disabilities, looked-after children / care-experienced young adults, people at risk of domestic violence, people with alcohol or drug dependencies, and people leaving prison. Often individuals have multiple support needs, such as people with both physical and learning disabilities, elderly people with a mental illness, and homeless people with a drug dependency.

7.232 Policy H8 adopts the term ‘specialised housing’ to relate to all housing made available specifically for occupation by older people, homeless people or other people with care or support requirements. Depending on the nature of provision and the level of care and support, housing provided for these groups may also be known as ‘supported housing’ or ‘care homes’. In addition, the London Plan provides a detailed definition of ‘specialist older persons housing’, which is essentially self-contained housing (usually with a range of communal facilities) where personal care is available but contracted separately. Examples of different types of ‘specialised housing’ addressed by Policy H8 include:

- sheltered housing - clusters of accommodation where people live independently in self-contained homes and where some support is available, possibly on-site (usually within Use Class C3);
- extra-care housing – also independent living in self-contained homes, but designed to enable provision of additional support as occupiers’ needs increase, with on-site care available. On-site facilities may also provide support for residents in the wider community. Shared lounges and other social and leisure facilities are sometimes provided. Care home accommodation may also be included on-site (extra-care homes are usually within Use Class C3, but this may vary depending on the level of self-containment of the homes and the level of care provided);
- care homes where support and care are available 24 hours a day – commonly bedsit rooms with shared lounges and eating – this may involve residential care only, nursing homes staffed by qualified nursing staff, or dual-registered care homes where medical assistance is provided to occupiers that need it (care homes are usually within Use Class C2);
- small supported living schemes – homes shared by no more than 6 people living as a household with support available, sometimes on-site (within Use Class C3); and
- hostels occupied by people with a shared support need (typically more than 6 people), most commonly homeless people (hostels are outside any use class).

7.233 With the exception of part B, Policy H8 does not address homes that may be occupied by older people or other people with care or support requirements, but are not designated for use by these groups.

Specifically, other policies deal with:

- hospitals and boarding schools – see Policy SC3;
- hostels aimed at tourists and backpackers – see Policy IE5;
- self-contained housing without on-site care or support (within Use Class C3) – see primarily Policies H1, H3, H4 and H7;
- student housing (known as purpose-built student accommodation) – see Policy H9; and
- accommodation shared by more than 6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (larger houses in multiple occupation or HMOs and other housing with shared facilities, including hostels aimed at groups other than those with care or support requirements) – see Policy H10.

Policy H8

Housing for older people, homeless people and other people with care or support requirements

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- A.** The Council will assist older people, homeless people and other people with care or support requirements to live as independently as possible by:
1. encouraging adaptations that enable them to remain in their existing homes (Part B below);
 2. supporting adaptation / replacement of existing specialised housing to meet contemporary needs (Part C below);
 3. seeking a proportion of housing and affordable housing in the largest housing developments to meet the specific needs of these groups (Parts D and E below);
 4. supporting development of a variety of specialised housing (Part F below); and
 5. resisting the net loss of existing specialised housing floorspace (Parts G and H below).
-
- B.** We will encourage and support development that adapts existing homes occupied by older people or other people with care or support requirements to enable them to live independently and safely in their own homes.
-
- C.** We will support development that adapts or replaces existing specialised housing for older people, homeless people or other people with care or support requirements to meet contemporary needs where this would be consistent with the criteria in Part F of this policy.
-
- D.** In accordance with Policy H4 (Maximising the supply of affordable housing), the Council may seek affordable housing to meet the specific needs of older people, or other people with care or support requirements, as a proportion of the additional affordable housing provision from the largest developments (typically those involving 100 homes or more).
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- E.** In accordance with Policy H6 (Housing choice and mix), we may also support the inclusion of housing to meet the specific needs of older people, homeless people or other people with care or support requirements, where housing is proposed as Part of a development with a site area of 0.5 ha or greater and the specialised housing would be consistent with the criteria in Part F of this policy.
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Policy H8

Housing for older people, homeless people and other people with care or support requirements

- F.** We will support development of a variety of specialised housing for older people, homeless people and other people with care or support requirements provided that the development:
1. is targeted towards existing borough residents;
 2. meets demonstrable needs of Camden's older people, homeless people, or other people with care or support requirements, in terms of the type of facilities, the level of independence, and the provision of suitable support and/or care;
 3. is accessible to social networks, social infrastructure and transport infrastructure appropriate to the needs of the intended occupiers;
 4. contributes to creating a mixed, inclusive and sustainable community;
 5. protects residential amenity in accordance with Policy A1;
 6. meets relevant design requirements of this Local Plan and the London Plan, particularly in relation to accessibility for disabled people;
 7. in the case of any market-led development of specialised housing that contains self-contained homes or provides specialist older persons housing (as defined by the London Plan), makes a contribution to the supply of affordable housing in accordance with the London Plan and Local Plan Policy H4; and
 8. in the case of any market-led development of care home accommodation (as defined by the London Plan), is provided at costs consistent with the North Central London minimum sustainable bandings, or provides access to a proportion of places for Council-funded residents at a sustainable cost.
- G.** We will resist development that involves the net loss of existing specialised housing floorspace unless either:
1. the existing housing is shown to be surplus to needs within the borough; or
 2. it can be demonstrated that the existing housing is incapable of meeting contemporary standards or providing suitable support and/or care; or
 3. adequate replacement accommodation will be provided that satisfies the criteria in Part F of this policy; or
 4. the loss of floorspace is necessary to enable the development of housing for the same group that satisfies the criteria in Part F of this policy and is better able to foster independent living and meet any changes in their support and care needs; or
 5. the development will otherwise enable the provision of an alternative form of housing, support or care that better meets the objectives of this policy and the Local Plan.
- H.** Where the Council is satisfied that a development involving the loss of specialised housing floorspace is justified, we will expect it to create an equivalent or greater amount of floorspace for either:
1. an alternative form of specialised housing that satisfies the criteria in Part F of this policy; or
 2. an alternative permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate contribution to affordable housing, having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.

7.234 Policy H8 covers homes for a broad range of people who need housing that is tailored to their specific circumstances and provides access to support or care. The numbers of people needing some form of support is expected to increase over time due to factors such as greater identification of conditions such as Autism, and growing numbers of older people with longer life expectancy.

7.235 The Council is currently developing strategies to meet the needs of the various groups of people involved, but common themes across these groups are for the Council to provide ‘floating’ care and support and adaptations that enable people to remain in their own homes or to live as independently as possible in suitable specialised housing. The Council has established a Shared Lives service, where adults with care or support requirements live in the homes of people who enable them to thrive and lead healthy lives as part of the community. We follow a Housing First approach where possible (providing for people to move directly into homes where they can be supported long-term). We also take a pathways approach to some groups, which involves temporary periods in supported accommodation for people as they prepare for independent living. While a high proportion of needs will be met by enabling people to live in suitable homes in the general housing stock, we anticipate that that some development of specialised housing for people with care or support requirements will be needed to replace unsuitable facilities and cater for a range of diverse needs across the population. To enable new provision to be used by a wide range of residents, including those with multiple and complex support needs, wherever possible it should be Autism-and dementia-friendly.

7.236 Accessibility is often a key issue for older people and other people with care or support requirements. Accessible housing is required by many older people, and people of all ages with a physical disability, including a significant proportion of people with learning disabilities who also have a physical disability. Many other people also benefit from accessibility measures. The Council will

seek to maximise opportunities for people to live independently in their own homes by ensuring that all new homes are designed to be accessible and adaptable where feasible, and that a proportion of new homes are wheelchair adaptable dwellings or wheelchair accessible dwellings (homes that are fully fitted out for occupation by a household with a person who uses a wheelchair) in accordance with Policy D3 (Design of Housing). We will also seek to ensure that there are some larger sized wheelchair accessible homes available for people who need to use non-standard wheelchairs. The Council also adapts general needs housing to meet the specific needs of its occupiers. We will aim to make better use of existing adapted and adaptable housing in our borough to meet the needs of people with physical impairments including older people.

7.237 A significant number of older people and other people with care or support requirements, are supported in residential and nursing care homes, many of which are operated by Housing Associations or private providers. Having regard to its duties under the Care Act 2014, the Council seeks to shape the market in care provision jointly with other authorities across North Central London (Barnet, Enfield, Haringey and Islington). More information is provided in the subsequent paragraphs related to older people, mental health, and learning disabilities, and also those related to new market provision and affordable housing requirements.

7.238 The following paragraphs examine six particular need groups and provide an outline of the housing support currently offered to them and their anticipated future needs. There will also be many other groups needing housing support, and the groups outlined are simply those that represent a significant proportion of overall support needs. The identification of future needs is an ongoing process, and those presented here represent a snapshot of current thinking across the relevant services. Over the Plan period, it is likely that the range and scale of needs will change as new evidence and new pressures emerge.

Older people

7.239 Nationally, the number of people over 65 is forecast to grow dramatically over the next 20 years, and the number of people over 85 will more than double. This issue is less pronounced in Camden as the population profile is skewed towards young adults, nevertheless, the number of people aged over 75 is expected to increase by around 40% over the Plan period.

7.240 There is a large stock of sheltered housing in Camden, involving over 1,500 homes managed by the Council or by Housing Associations. This housing often offers very limited support, and is often not well designed for disabled people or for care and support staff to provide assistance. It is likely that a proportion of this stock will need to be adapted or replaced over time to enable its use by residents with support needs. In some cases, sheltered housing may be adapted to provide Extra Care housing.

7.241 Extra Care housing is designed to enable provision of additional care as occupiers' needs increase, with on-site care available. It takes the form of self-contained homes with some communal facilities, such as a shared lounge. It was originally conceived with the needs of older people in mind, but is now viewed as an intergenerational resource. It can often meet needs that would otherwise be met in residential care homes. There are currently around 180 Extra Care flats in Camden, located in five facilities each with 30-40 flats. We anticipate that around 40-45 Extra-Care flats will be needed in the first 10 years of the Plan period. The way in which these are provided could vary depending on the opportunities that arise. Up to 45 flats could potentially be provided in a single carefully managed facility, or alternatively one facility of 30-40 flats could be provided in the first 10 years of the Plan period, with another following towards the end of the Plan period.

7.242 The Council currently supports over 300 older people in care homes with residential or nursing care. Around 200 supported places are outside the borough, but over half are in North Central London. Our aim is to reduce the number of places in low-level care facilities through provision of re-ablement services, care and support at home, and an expansion of Extra Care. We will also seek to commission 20 new nursing care places, either in the borough or elsewhere in North Central London.

Mental health

7.243 The Council supports around 200 places in supported housing in the borough. These are split over many properties, of which one is owned by the Council and the remainder by Housing Associations. Only a quarter of these places are in properties which are wholly fit for purpose. Just under a half are thought to be capable of renovation, and the remaining quarter will need to be replaced. Almost three-quarters of places are for people with high support needs and staffed for 24 hours, 7 days a week. The Council also supports a small number of places outside Camden for people with specialist mental health needs.

7.244 For new and replacement provision, we expect each development to involve 12-15 self-contained flats. Our aspiration is for developments to be accessible to disabled people, provide self-contained flats or flats with en-suite bathrooms, provide adequate space for staff and resident communal space, have inbuilt security features and outdoor open space, and be in an area of low street activity. We anticipate that at least two schemes will be required to replace current provision that is not fit for purpose, and one to accommodate the impact of population growth.

7.245 The Council currently supports 25 places in residential or nursing care homes in Camden for people needing mental health support, and just over 100 places elsewhere. One property in the borough (providing 13 beds) is not fit for purpose, and we anticipate that replacement provision will be required. Population growth could also generate need for a further 35 places in care homes over the lifetime of the Plan. The Council is considering its strategy for meeting future care needs.

Learning disabilities

7.246 The Council supports just under 100 places in supported housing in the borough for residents with learning disabilities. These are split over almost thirty properties, primarily owned by Housing Associations. Many are too small to operate efficiently, lack self-contained flats or en-suite bedsits, and are deficient in access for those with physical disabilities. The Council currently anticipates seeking remodelling of one property to provide four replacement places, and commissioning new development to provide around twelve replacement places. In addition, the Council supports around 30 places outside Camden.

7.247 For new and replacement provision, we expect each development to be accessible to disabled people, provide 4-6 places in individual self-contained flats or en-suite bedsits, and provide adequate space for staff and resident communal space. New provision should be Autism-friendly and suitable for those with complex needs. We anticipate that two to three schemes will be required to replace current provision. In addition, we anticipate that four further schemes will be required in the first 10 years of the Plan period to accommodate new needs, and potentially one or two further schemes in later years. We will also aim to provide a facility with 4-6 beds to provide emergency and respite care.

7.248 The Council currently supports people with learning disabilities in care homes outside Camden. These include around 70 places in residential care homes and 16 in nursing care homes. Nursing care places are secured in North Central London as far as possible.

Autism

7.249 The Council has a duty to provide services for Autistic adults and children. People with Autism that need support often do so because of a co-existing mental health need or learning disability, and many already draw on care and support from services. The Council is carrying out an assessment of current and future needs for Autistic adults and children, but currently expects to focus on ensuring that all new provision of supported housing and care homes is Autism-friendly rather than developing Autism-specific accommodation. We are also considering advice and adaptations we can offer to better support neurodiverse people living in their own homes across all tenures.

Children and young people

7.250 People up to the age of 25 are supported by the Council's service for young people. Children are supported in foster care wherever possible, but the service also supports a 7 bed children's home for 12-17 year olds where no suitable foster carer can be provided. The Young People's Accommodation Pathway provides a variety of support, including support visitors and specialist support for young parents and those with mental health needs. The Pathway provides over 230 beds across almost 30 properties in Camden, mostly owned by Housing Associations.

7.251 The Council is to undertake a detailed needs analysis to inform our future strategy. Emerging needs are for a smaller children's home providing therapeutic support for those with complex needs, locally based respite and emergency care for those with complex needs who are aged 18 or under, and an additional facility for young people with mental health needs (the current facility is funded exclusively for former looked after children and care leavers). Challenges we will need to tackle include:

- a high proportion of our needs is for unaccompanied children who are asylum seekers, often with complex emotional needs related to trauma and loss;
- risk of exploitation and abuse;
- placements for children with complex needs are often outside London and very expensive;
- provision for young people in the borough is often in inappropriate and out-dated buildings.

Homeless adults

7.252 The Council works to prevent homelessness, guide households into more settled accommodation, and operates a 'pathway' approach that gradually prepares single homeless people for independent living. For homeless families, the Council's focus is to reduce the need for temporary accommodation by helping families into longer-term housing solutions. The Council is currently supporting more than 600 people in the 'adult pathway', and over 70 people have been supported through Housing First.

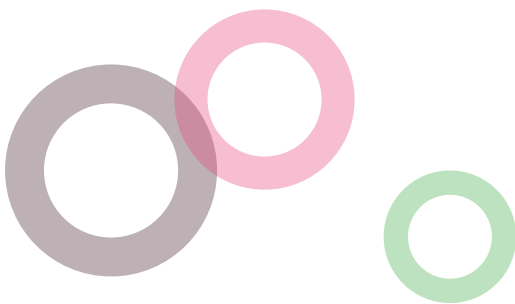
7.253 Through the Community Investment Programme (CIP), the Council has been carrying out a series of developments to ensure our supported accommodation for homeless people meets contemporary needs, redeveloping or remodelling and extending facilities where appropriate, and decommissioning the least suitable facilities. Modernised hostels for single people have been provided at Mount Pleasant and Holmes Road. Works are ongoing to replace two small facilities for single homeless people at 248-250 Camden Road and 2 Chester Road with expanded facilities suitable for homeless families. Emerging needs are for a fully accessible purpose-built hostel for people with complex needs and a specialised women-only hostel.

Meeting future needs for Council-commissioned housing support

7.254 To meet the anticipated needs for supported housing services commissioned by the Council, we will need to take advantage of a variety of opportunities. This is likely to involve working with our Community Investment Programme (CIP) or with Housing Associations and other providers. Opportunities could involve adapting or replacing facilities that no longer fit for purpose under Part C of this policy, or encouraging the inclusion of specialised or supported housing on large development sites (those with an area of 0.5 ha or greater) under Part E. We also anticipate that a number of small supported housing facilities could be negotiated as part or all of the contribution to affordable housing through Part D of this policy operating in tandem with Policy H4 for the largest developments involving housing (typically those providing 100 homes or more). In all cases, the appropriateness of new provision will be assessed under the criteria set out in Part F of this policy.

Assessing proposals for new provision

7.255 Part F of Policy H8 sets out basic criteria for assessing proposals of specialised or supported housing. In terms of the Council's market shaping duties under the Care Act 2014 and the protection of existing services in the borough, key issues are the extent to which the proposal is intended to provide for existing borough residents and the fit between the particular care / support service and local needs. New facilities which saturate the local market for a particular type of support can lead to increased levels of vacancy and costs across that sector, and may ultimately lead to the failure of some providers and to the disruption of care and support for residents. Furthermore, facilities that primarily attract residents from other areas who initially fund their own care and support may place severe strain on the Council's budget if the long-proposed personal cap on self-funding is introduced. An example in Camden is the closure of a large nursing care home and establishment of a new service on the site which offers residential care for older people requiring relatively low levels of support. The local market for standard residential care is already saturated, and take-up of places at the new service has been very limited to date.



New market provision and affordable housing requirements

7.256 Criteria in Part F also address the appropriateness of the location. Key issues include the availability of suitable local networks and infrastructure, the effect of a proposal on the community's mix, and the protection of residential amenity for occupiers and neighbours. Access to social networks and facilities are vital to prevent people with care or support requirements from becoming isolated. A concentration of people who have high support requirements could unbalance the social mix in an area, and in rare cases could create noise and disturbance or otherwise harm the amenity of other residents and neighbours. Conversely, some people with support requirements may be particularly vulnerable to the high or unpredictable levels of noise that can arise in dense urban environments. The location and character of new provision should be such that any risk of conflict between occupiers and neighbours can be minimised and occupiers can contribute to the balance and inclusiveness of community. Where appropriate, the Council will use conditions and/ or legal agreements to control the management of housing for people requiring care or support, and to specify the group or groups that it is intended to support.

7.257 The Council will support proposals for co-housing where this is consistent with Part F of Policy H8 and other relevant policies of the Local Plan. Co-housing is created and run by residents to provide a community encompassing a range of generations. Through the provision of shared facilities, meeting and play areas, co-housing can encourage social interaction and community care for younger and older people. We recognise that opportunities for co-housing in the borough are limited by the high cost of land and the limited availability of sites, but opportunities may be increased through the provision of serviced plots for people wishing to build their own homes under Policy H6 (Housing choice and mix).

7.258 The London Plan provides a detailed definition of 'specialist older persons housing', which is essentially self-contained housing (usually with a range of communal facilities) where personal care is available but contracted separately from the occupation of the accommodation itself. The London Plan provides indicative benchmarks for this type of housing to inform local level assessments, and sets a Camden benchmark of 105 additional homes per year up to 2029. There is a growing market for this type of accommodation, and two new schemes have been completed in Camden since 2019, although the local supply is relatively limited at present. The resources older people have to access such accommodation vary considerably depending on whether they own their existing housing, any other assets and investments they have, and whether they have an occupational pension.

7.259 The London Plan indicates that affordable housing policies and the viability threshold approach apply to 'specialist older persons housing'. Consequently, when considering proposals for homes of this type, we will seek affordable provision in accordance with the London Plan and Local Plan Policy H4 (Maximising the supply of affordable housing). In applying affordable housing requirements, the Council will have regard to the distinct viability characteristics of the sector (such as costs and revenues from shared facilities and services, and provisions for termination of a lease), and the potential differences in the character of affordability between people of pensionable age and people of working age.

7.260 In line with the London Plan, we note that the guideline mix of affordable housing types in Policy H4 may not be appropriate for ‘specialist older persons housing’. When considering the form of the affordable housing contribution, we will strongly encourage provision of a variety of tenures on-site to suit older people from different backgrounds, such as the inclusion of intermediate housing for those who would otherwise be unable to access specialist older persons housing. However, as an alternative, we will also support the delivery of on-site affordable housing for general needs in accordance with the guideline mix in Policy H4 Part B where this is feasible, having regard to whether developments are able to include separate blocks and / or stair / lift cores for the affordable element. Also in accordance with Policy H4 Part B, where on-site provision would not be practical or achieve the best contribution, we may accept an off-site contribution, or exceptionally a payment-in-lieu.

7.261 The London Plan distinguishes between ‘specialist older persons housing’ and ‘care home accommodation’. Broadly, the London Plan indicates that care home accommodation involves the provision of the personal care and the housing as a joint package, where there is no clear separation between the two. The London Plan also indicates that the activity regulated by the Care Quality Commission is likely to be ‘accommodation for persons who require nursing or personal care’.

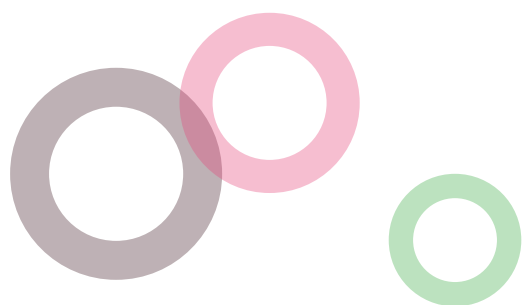
7.262 Neither the London Plan nor Local Plan Policy H4 seek to apply a conventional requirement for provision of affordable housing to ‘care home accommodation’ as defined in the London Plan. However, we will consider proposals to develop accommodation of this type having regard to the Council’s market shaping duties under the Care Act 2014, and our joint arrangement with other authorities across North Central London (Barnet, Enfield, Haringey and Islington). We will also have regard to North Central London minimum sustainable bandings, which are regularly reviewed across the North Central London authorities, and reflect what the Council can sustainably pay to provide funding for care home residents.

7.263 In view of the saturation of the local market for standard residential care, and our assessment of existing and emerging needs in the borough, we will resist further provision of standard residential care, and encourage provision of nursing care and specialist care (e.g. dementia care) at costs consistent with the North Central London minimum sustainable bandings. Where proposed provision would be suitable to meet the needs of Camden residents that are currently unmet, are met in facilities that no longer meet contemporary standards, or are met outside North Central London, we may seek to negotiate access to a proportion of places for Council-funded residents at a sustainable cost.

Protecting existing provision

7.264 In the context of the high land values and limited supply of development sites in Camden, sites that are currently used for specialised housing represent an important resource. Such sites will tend to have a lower existing use value than general needs housing. They are likely to come under pressure for redevelopment for a higher value use, and once lost they will be very difficult to replace. Consequently, the Council will seek to retain these sites in specialised housing use in accordance with Part G of this policy.

7.265 The amount and type of specialised housing required in the borough is changing, for example less sheltered housing will be required for older people with low support needs and more extra care provision will be required for older people needing intensive support. Some of the Council’s existing provision is in properties that are not suitable to meet contemporary needs, including much of our provision related to mental health needs and learning disabilities. Where specialised housing is no longer suitable or needed to provide for a particular group of older people, homeless people or other people with care or support requirements, as indicated by Part H of this policy, we will consider whether it could be remodelled or redeveloped to meet the specialised housing needs of an alternative group in the borough. We will also consider whether it could be redeveloped to provide self-contained housing for people in the borough with support needs.



7.266 As also indicated by Part H, where specialised housing is no longer suitable or needed for a particular group, and there are no suitable options to meet alternative needs for specialised housing in the borough, the Council will expect any alternative development to provide an equivalent or greater amount of floorspace in another form of permanent housing meeting general needs. We will prioritise the delivery of self-contained housing in accordance with the priority land-use set out in Policy H1 (Maximising housing supply), but acknowledge that in some cases the design and layout of specialised housing may more readily lend itself to development for a form of permanent housing with shared facilities.

7.267 We will resist the use of specialised accommodation in Camden to meet support needs arising outside the borough since the provisions of the Care Act 2014 mean that any development that attracts additional care users into the borough could have a significant impact on Council resources. In accordance with Policy H1 (Maximising housing supply) and Policy H3 (Protecting existing homes), the Council will resist proposals for non-residential development, and resist the conversion of specialised accommodation with shared facilities (such as hostels for homeless people) into short-term lets or visitor accommodation (such as backpackers' hostels). Hostels do not fall into a planning use class, so the Council will regard any material change to the use (including a change to the type of occupier) as development.

7.268 When considering development for an alternative form of permanent housing to meet general needs, we will expect the housing proposed to satisfy all relevant Local Plan policies, to make an appropriate contribution to affordable housing in accordance with Policy H4, and to retain or replace existing affordable housing in accordance with Policy H5 (Protecting and improving affordable housing). The Council will negotiate the contribution to affordable housing (including retention or replacement) taking into account all relevant criteria in Part E of Policy H4, and any other material considerations.

7.269 We note that until very recently, market-led specialised housing has been developed free from the application of any affordable housing requirements, and also that the stock that is most likely to be decommissioned will often be older accommodation that is best able to provide low-cost places. Consequently, where smaller developments for an alternative form of housing are proposed (with capacity for 15 or fewer additional homes), the Council will apply Policy H4 treating all the housing floorspace proposed as additional housing floorspace. We will also have regard to any need to generate funding to provide replacement housing elsewhere that meets the needs of older people, homeless people or other people with care or support requirements. If replacement specialised housing is provided elsewhere, we will consider the proportion of affordable housing provided across both sites.





Purpose-built student accommodation

7.270 Policy H9 seeks to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds.

7.271 Policy H9 particularly relates to housing that:

- is primarily occupied by students, and managed by an education institution or an independent provider;
- is generally restricted to occupation by students during term-time;
- is generally let to each occupier for the duration of an academic year, and not less than an academic term; and
- provides some common facilities and/or services, although the extent of these can vary.

7.272 Purpose-built student accommodation is the term used by the London Plan to refer to housing that is designed and managed specifically for occupation by students. We have adopted the same term for the Local Plan, but the Council will require student accommodation to comply with Policy H9 whether it is new-build accommodation or converted from other uses, provided that occupation is restricted to students. The Local Plan also uses the term “student housing” as a more concise way to refer to “purpose-built student accommodation”.

7.273 Other policies in this plan contain specific provisions for some kinds of housing that may be occupied by students (but occupation is not restricted to students):

- self-contained houses and flats (including build to rent developments) are considered primarily in Policies H1, H3, H4 and H7;
- houses and flats shared by 3 to 6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (small houses in multiple occupation or HMOs, Use Class C4) are treated in the same way as self-contained houses and flats (in Use Class C3) and are considered primarily in Policies H1, H3, H4 and H7;
- other accommodation shared by more than 6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (larger houses in multiple occupation or HMOs, and large-scale purpose-built shared living) are considered in Policy H10;
- key-worker accommodation such as nurses’ homes and hostels are considered in Policies H4 and H5; and
- hotels and other visitor accommodation (e.g. serviced apartments, apart-hotels and hostels aimed at tourists and backpackers) are considered in Policy IE5.

7.274 In this plan the expressions “academic term” and “term” refer to a continuous period of classes or learning, whether the year is divided into 2, 3 or 4. The minimum length of a term is usually eight weeks.

Policy H9

Purpose-built student accommodation

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- A.** The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.
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- B.** The Council will seek a supply of student housing to meet or exceed Camden's target of 200 additional places in student housing per year and will support the development of student housing provided that the development:
1. will not involve a disproportionate loss of self-contained homes (particularly homes with 3 bedrooms), having regard to the overall addition to housing supply;
 2. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing;
 3. complies with any relevant standards for houses in multiple occupation and any relevant residential design standards to provide safe, functional, adaptable and accessible spaces, including shared spaces, outdoor amenity space and laundry facilities;
 4. includes a range of accommodation to suit students with differing lifestyles and incomes, including cluster flats where possible;
 5. for the full duration of all terms in the academic year, will be secured for students at the Council's recognised higher education institutions, which will generally be those in Camden and adjoining London boroughs that are funded by the Office for Students;
 6. will have nominations agreements in place to provide housing for students at one or more recognised higher education institutions, including nominations agreements for any affordable student accommodation incorporated in the development;
 7. will be accessible to public transport and will not have a detrimental impact on the transport network;
 8. contributes to creating a mixed, inclusive and sustainable community;
 9. protects residential amenity in accordance with Policy A1;
 10. will be accompanied by a Student Management Plan, and a Non-student Management Plan where alternative uses are proposed outside term-time;
 11. will be managed as a single planning unit; and
 12. provides affordable student accommodation or otherwise provides an appropriate contribution to affordable housing in accordance with Policy H4, particularly Part D.
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Policy H9

Purpose-built student accommodation

- C.** The Council will resist development that involves the net loss of student housing unless:
1. either it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing;
 2. or adequate replacement accommodation will be provided that satisfies the criteria in Part B above;
 3. or it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere;
 4. and in the case of proposals satisfying points 1, 2 or 3, the development creates an equivalent or greater amount of floorspace in an alternative permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.
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7.275 Camden is home to many education institutions of national and international significance, notably 9 publicly funded Universities. In addition, the borough has several other colleges that prepare young adults for higher education, and the Universities have advised that these colleges can support Camden's international academic reputation by helping them to attract students, particularly from overseas. The provision of higher education and research significantly contributes to Camden's ambition for its local economy to be strong, sustainable, and inclusive.

7.276 Camden is also home to approximately 25,000 resident full-time students (almost 6% of the London total). There are approximately 13,000 bedspaces available in purpose-built student accommodation in Camden, while the majority of the remaining resident students live in other forms of rented housing.

7.277 The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year and proposes that at least 35% of new student housing should be let at an affordable rent to nominees from one or more specified Higher Education institutions.

7.278 Over 3,000 additional student rooms were delivered in Camden between 2011 and 2016, but only around 500 rooms were delivered from 2016 to 2024. The interest in developing student accommodation in the borough now appears to be returning, with a number of additional developments permitted and others in the planning process. The main alternative source of accommodation available to students in Camden is private rented housing. The Council considers that the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market.

7.279 Policy H9 sets out criteria that we will use to assess proposals involving student housing, including additions and losses. Details of how we will apply the policy are summarised below and set out more fully in the London Plan 2021 and our supplementary planning document Camden Planning Guidance on Student Housing.

Student housing target

7.280 The overall strategic requirement for purpose-built student accommodation in London was established through the work of the Mayor's Academic Forum, which identified a requirement for 3,500 additional purpose-built student accommodation bed spaces annually over the period of the London Plan 2021. Work has commenced on a review of the London Plan 2021 with a view to its replacement in 2027.

7.281 To calculate the annual target for purpose-built student accommodation in Policy H9, the Council has used the London Plan annual requirement and data for full-time resident students from the 2021 Census (March 2021, students aged 18 and over) and the Higher Education Statistics Agency (academic year 2021/22, students registered at London's publicly funded Higher Education Institutions). We have calculated Camden's share by taking the mid-point of the number of Camden resident students from the two sources, and dividing it by the mid-point of the number of London resident students, and concluded that Camden's resident students were 5.7% of the London total. Applying this to the London Plan 2021 annual requirement generates the Camden target of 200 additional student bedspaces a year adopted by Policy H9 as the minimum borough requirement.

7.282 We will review the Local Plan target as the new London Plan emerges, and will aim to meet or exceed Camden's share of any new London Plan target, based on the updated proportion of London's resident students that are resident in the borough.

Additional student housing and the priority for self-contained homes

7.283 Policy H1 indicates that self-contained housing is the priority land use of this Plan, while Policy H3 (Protecting existing homes) resists proposals involving the net loss of self-contained homes. In addition, Camden's Local Housing Needs Assessment indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a three bedroom home. Nevertheless, additional student accommodation contributes towards meeting our housing target (with 2.5 student rooms treated as equivalent to one home), addresses a permanent housing need, and can reduce the pressure for students to share existing large homes. Balancing these considerations, the Council will seek to minimise the loss of self-contained homes with 3 bedrooms, and expect any student housing developments that involve loss of self-contained homes to create a net positive contribution to meeting the borough's housing target.

7.284 In preparing the Local Plan we have assessed the most suitable uses for each allocated site, and have identified several allocations where student accommodation could be provided. Where planning permission has been granted for self-contained housing, self-contained housing has been assessed as a suitable and deliverable use. Given that permanent self-contained housing is this Plan's priority land-use, the Council will resist the development of student accommodation on a site allocated for self-contained homes, or a site that has an existing consent for self-contained housing, unless evidence is submitted to demonstrate that there is no reasonable prospect of a viable development for permanent self-contained housing coming forward within the Plan period.

Space standards and quality of accommodation

7.285 Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life, and this is as true for students as it is for the wider population. Student housing should provide residents with a place for rest, relaxation, safety, privacy, and society. The design should include appropriate spaces and layouts that minimise risk to health and safety, are practical, and support adaptability and accessibility.

7.286 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation (HMOs), which apply to most student housing that is not provided by an educational institution. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. The Council will require proposals for student housing to comply with the relevant minimum standards. Drawings accompanying planning applications should demonstrate compliance with these minimum standards.

7.287 In addition to the basic amenities expected from student housing (kitchen and personal hygiene facilities), the Council will expect developments to include shared lounges / recreation rooms, outdoor amenity space and laundry facilities. The Council will also support the inclusion of facilities that are open to the public in appropriate circumstances. Further guidance on the minimum HMO standards and our expectations and benchmarks for shared facilities is set out in Camden Planning Guidance on Student Housing, and developers will be expected to have due regard to this.

7.288 The Council will expect any scheme for student housing to incorporate design measures that promote personal safety and security and reduce the risk of crime and the fear of crime, in accordance with Policy A2 (Safety and Security). Applicants should consider the Secured by Design principles and guides, and should discuss any scheme with Police Designing Out Crime Officers at the pre application stage. All management arrangements related to safety and security should be included within the management plan(s) for the development, secured as a planning obligation.

Wheelchair accessible rooms

7.289 The Building Regulations relevant to the accessibility of new-build student housing are in Approved Document M: access to and use of buildings, volume 2 – buildings other than dwellings. Paragraph 0.16 indicates that purpose-built student living accommodation should be treated as hotel / motel accommodation in relation to space requirements and internal facilities, as set out in paragraphs 4.17 to 4.24 of Approved Document M: volume 2. These include a requirement for at least 5% of bedrooms to be wheelchair accessible. Drawings accompanying planning applications should demonstrate compliance with these standards.

Range of accommodation and cluster flats

7.290 Applicants should include a range of accommodation wherever possible to suit students with different incomes, those desiring space for private study, and those seeking a more collective student lifestyle. Providing a range of rooms and layouts including “cluster-flats” (small clusters of study-bedrooms with a shared facilities such as kitchen-diners) can help to make them attractive to students who would otherwise share private rented accommodation, enhance social interaction, and offer a lower cost rent option and help to meet the needs of the student body as a whole. Where affordable student accommodation is incorporated into the development in accordance with the London Plan, it may well be appropriate for this to take the form of cluster flats. Our Camden Planning Guidance on Student Housing sets out further guidance on the expectations regarding flat layouts, and developers will be expected to have due regard to this.

The institutions to be served

7.291 London’s publicly funded universities are part of the national and regional education infrastructure, support London’s role as an international centre of academic excellence, and are a key part of the growing knowledge-based economy. Expecting places in student housing to be offered to those at publicly funded universities is a straightforward way for the provider and the Council to ensure that accommodation is only offered to genuine students registered for an academic course of study. Where new student housing is proposed the Council will negotiate planning obligations to ensure that the term-time occupiers are students at our recognised Higher Education Institutions. Limiting non-student occupation to periods outside term-time maximises the potential for students to access accommodation for the duration of their course in each academic year and can help to maintain an appropriate environment for study.

7.292 The Council’s recognised Higher Education Institutions are those funded by the Office for Students (OfS) (which regulates higher education providers on behalf of all students and distributes government higher education funding) that have a base in Camden or an adjoining London borough. There are more than twenty of these. The focus on these institutions helps us to support Camden as an academic centre, and also enables students to choose sustainable transport options, as explained in the paragraphs below addressing impact on the transport network.

7.293 The Council will consider providing access to student accommodation for those on courses at publicly funded Higher Education Institutions beyond our neighbouring boroughs where they are well-connected to Camden and sustainable transport options are available. There are a number of other colleges in the borough that are not publicly-funded but help to support London’s international academic reputation. In some instances the Council may support development of student housing by these colleges. Further information about how proposals will be considered is provided in our Camden Planning Guidance on Student Housing.

Nominations by Higher Education Institutions

7.294 A nomination agreement is a mechanism which provides for Higher Education Institutions to reserve some or all of the rooms in an independently provided development of student accommodation for occupation by students that the institution has chosen or “nominated”. The details may vary, with some institutions seeking only a small number of nominations for as little as a year, and some institutions seeking many more for periods such as five years. In some cases, the institutions may agree to cover the rental cost of their nominated rooms if they become vacant.

7.295 The London Plan expects the majority of the rooms in developments of student accommodation to be subject to nomination agreements with one or more institutions by the time of first occupation, and expects these to be renewed or replaced from year-to-year. The London Plan focuses particularly on securing nomination agreements for any affordable student accommodation incorporated into the development.

7.296 The Council considers that nomination agreements are the best way to ensure that affordable student accommodation is occupied by the students that need it most, and will negotiate for planning obligations to include a commitment to seek nomination agreements for any affordable student accommodation and an appropriate proportion of additional rooms. We also acknowledge that Higher Education Institutions may be less willing to enter into nomination agreements for rooms offered at the full market cost for student rooms, and will take this into account when negotiating planning obligations. The Council may seek nomination rights for a limited number of student rooms to accommodate care-experienced young adults who are studying at our recognised institutions.

7.297 In some cases, developers of student accommodation may prefer to make a contribution to self-contained affordable housing as an alternative to providing affordable student accommodation. The Council encourages this approach through Part D of Local Plan Policy H4.

Impact on the transport network

7.298 Student housing should serve institutions that are within walking, wheeling or cycling distance, or accessible by public transport. Student housing that is remote from the institution that it serves can have a significant impact on a public transport route or service connecting the two sites. Adverse impacts can arise where student housing serves institutions beyond the borough and its neighbours, or where development outside the South Camden sub-area is not well-connected with the cluster of universities in Bloomsbury and the Central Activities Zone.

7.299 To ensure that occupiers of student housing have good access to their place of study, we will seek planning obligations to ensure that the term-time occupiers are students attending the Council’s recognised Higher Education Institutions with a base in Camden or an adjoining borough. We may also consider Higher Education Institutions in other locations where the transport links to the proposed accommodation are demonstrably capable of supporting sustainable travel choices. Public transport and other services that will support new student housing should have existing or committed capacity to accommodate the demand generated by the development. Funding towards services may be sought through planning obligations as appropriate.

7.300 The Council will expect student accommodation to be designed to comply with the transport policies in this Local Plan. A wide variety of requirements and tools will be applied to ensure that development supports sustainable transport choices, including cycle parking standards, car-free agreements, Travel Plans and Construction Management Plans.

7.301 A Transport Statement or Assessment and a Travel Plan may be required for student housing developments. Camden Planning Guidance on Transport provides two sets of thresholds (based on the size of development) that indicate whether a Transport Statement or Assessment is required, and whether a Local or Strategic Travel Plan is required. For the purpose of the thresholds, one student bedroom will be treated as equivalent to 1 residential dwelling (in Use Class C3).

7.302 A Construction Management Plan (CMP) will also be required for developments involving significant impacts on the public highway or significant excavation. 'Monitoring and measures' financial contributions are required for Travel Plans and CMPs. Transport Assessments and Travel Plans should take account of any proposed alternative uses of the student housing outside term time.

7.303 A financial contribution to walking, wheeling, cycling and public realm improvements will be sought if mitigation measures are required to overcome the impact of the development. A financial contribution to highway works will be sought to repair any construction damage to transport infrastructure and reinstate all affected transport network links and road and footway surfaces.

Creating a mixed, inclusive and sustainable community and protection of amenity

7.304 The creation of mixed, inclusive and sustainable communities can be a particular consideration where student housing is proposed, especially given the high concentrations of such accommodation in some parts of Camden. Students can benefit communities by working part-time in local businesses, helping to staff voluntary services, and spending in local shops. However, students are sometimes perceived as short-term residents with little connection to the established community. Specific concerns can include noise disturbance, over-crowding on public transport, or the loss of shops and services that meet the needs of longer term residents. The Council will therefore assess proposals for student accommodation having regard to any existing concentrations in the area, and the wider housing mix in the community. Our Camden Planning Guidance on Student Housing sets out further guidance about how we will assess concentrations of student housing.

2.305 Policy A1 indicates that we will seek to protect the amenity of the existing and future occupiers and the amenity of neighbours. This protection is as important for the occupiers of student accommodation who wish to pursue their studies as it is to other residents and their neighbours. Where the scale or concentration of student accommodation risks harm the balance and sustainability of the community or otherwise has potential to harm local amenity, the Council will seek a range of mitigating measures such as management plans. Where there is history of negative impacts from student accommodation in the area, and mitigation has been unable to resolve these, we may resist proposals for further development of student accommodation.

Student management plan

7.306 In association with applications for development of student housing, we will seek planning obligations to secure a Student Management Plan, and a Non-student Management Plan where alternative occupiers will be admitted outside term-time. A draft Student Management Plan should be submitted with any planning application for student accommodation to ensure the health, wellbeing and welfare of students and to mitigate any potential impacts of the development on neighbours and the local community. The Student Management Plan should act as a code of conduct that the provider will abide by in managing the student housing.

7.307 Where alternative occupation of the student housing is proposed outside term time, the applicant should also submit a draft Non-student Management Plan with any planning application to mitigate any potential impacts of the non-student use on other occupiers of the development, neighbours and the surrounding area. This should include similar provisions to the Student Management Plan insofar as the provisions are also relevant to the non-student occupation.

Affordable student accommodation and the alternative option

7.308 The Council will seek planning obligations to secure Student Management Plans for all student housing developments, and Non-student Management Plans where relevant. Generally, the draft management plans will be appended to the planning obligations, and the Council will require submission of the finalised management plans for approval by the Council prior to the occupation of the development. The Council will also require the development to be managed in accordance with the approved management plans at all times. Further guidance on what is expected to be detailed in a Student and Non-student Management Plan is set out in Camden Planning Guidance on Student Housing, and developers will be expected to have due regard to this.

Management as a single planning unit

7.309 The Council will seek to negotiate to secure management of each development of student accommodation as a single planning unit (which means being managed by a single body or operator), and prevent disposal of individual rooms or flats as independent self-contained homes. We consider that a single management regime is necessary to ensure admission of students from our recognised Higher Education Institutions, provide a safe and healthy environment for student occupiers, and ensure the successful operation of Student and Non-student Management Plans. Student accommodation would not normally comply with the nationally described space standard for self-contained homes, and consequently the disposal of individual units for independent occupation would be inappropriate.

7.310 The London Plan indicates that “the maximum level” of affordable student accommodation should be incorporated in developments of student housing, and operates the same viability thresholds that apply to self-contained housing. In the London Plan 2021, these are a threshold of 50% for industrial land and most public sector land and a threshold of 35% in other cases. Where the proportion of affordable housing reaches or exceeds the relevant threshold level, there is no requirement to submit a financial viability appraisal in support of the application, but if construction has not adequately progressed after a specified period (usually 2 years after permission is granted), an early stage viability review will be sought to indicate whether there is potential for any additional affordable student accommodation.

7.311 The Council will support proposals that offer affordable student accommodation in accordance with the London Plan provisions, but as an alternative we will strongly encourage contributions of self-contained affordable housing on-site in accordance with the guideline mix set out in Policy H4 Part B. We note that it will only be feasible to provide the Policy H4 guideline mix where the affordable housing can be provided in a separate block and / or be accessed from a separate stair/ lift core, rather than being fully integrated into the purpose-built student accommodation.



Protecting existing student accommodation

7.312 Given the importance of Camden's Universities to the local economy and the provision of a highly trained workforce to support the Knowledge Quarter, alongside the pressure students place on the wider private rented stock, the Council will seek to protect existing student accommodation, including housing managed by education institutions and independent providers, unless it is either:

- incapable of meeting relevant standards for houses in multiple occupation or other contemporary design standards, or fails to meet student expectation as demonstrated by a high incidence of vacant rooms and lack of demand; or
- adequately replaced by new provision which meets the criteria set out in Part B of Policy H9; or
- alternative accommodation is available that better meets the needs of the students it has served.

7.313 Where the loss of student accommodation is justified to the Council's satisfaction, any alternative development should provide an equivalent or greater amount of floorspace in another permanent housing use in accordance with Policy H3 (Protecting existing homes). We will prioritise the delivery of self-contained housing in accordance with the priority land-use set out in Policy H1 (Maximising housing supply), but acknowledge that in some cases the design and layout of student accommodation may more readily lend itself to development for an alternative form of permanent housing with shared facilities.

7.314 In accordance with Policy H1 - Maximising housing supply and Policy H3 - Protecting existing homes, we will resist proposals for non-residential development, and resist the conversion of student accommodation for year-round short-term lets or visitor accommodation (such as backpackers' hostels). Most forms of student accommodation do not fall into a planning use class, so the Council will regard any material change to the use (including a change to the type of occupier) as development.

7.315 When considering development for an alternative form of permanent housing to meet general needs, we will expect the housing proposed to satisfy all relevant Local Plan policies, and to make an appropriate contribution to affordable housing, in accordance with Policy H4. The Council will negotiate the contribution to affordable housing taking into account all relevant criteria in Part E of Policy H4, and any other material considerations.

7.316 We note that until very recently, student accommodation has been developed free from the application of any affordable housing requirements, and also that the stock that is most likely to be decommissioned will often be older accommodation that is amongst the cheapest available to students. Consequently, where smaller developments for an alternative form of housing are proposed (with capacity for 15 or fewer additional homes), the Council will apply Policy H4 treating all the housing floorspace proposed as additional housing floorspace. If replacement student accommodation is provided elsewhere, we will consider the proportion of affordable housing and affordable student accommodation provided across both sites.

7.317 Within Camden there is a modest supply of housing with shared facilities which is available to young people and visitors on a short or longer-term basis, usually run by charities and religious institutions. Such housing can be a valuable resource for students arriving in London for the first time, and in some cases is largely occupied by students. However, where this housing is not managed by an education institution or restricted to occupation by students during term-time, the Council will assess proposals involving its loss on the basis of Policy H10 (Housing with shared facilities) (including large-scale purpose-built shared-living) rather than Policy H9.





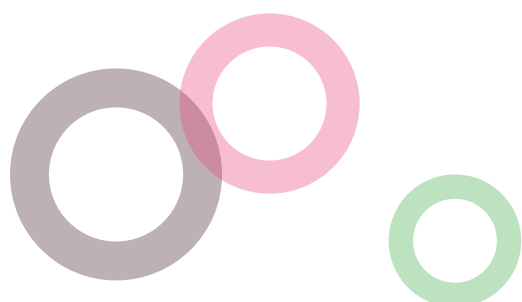
Housing with shared facilities (including large-scale purpose-built shared living)

7.318 Policy H10 seeks to ensure that there is continued provision of housing with shared facilities to meet the needs of small households in Camden.

7.319 In Camden, existing housing with shared facilities mostly takes the form of homes let to a group of friends, homes let room-by-room to unrelated individuals, or properties formally divided into bedsits.

7.320 There are also a few instances of other types of housing with shared facilities in the borough where the occupiers are long-term residents and Policy H10 applies (e.g. hostels for migrant workers, accommodation for members of a religious order). There are also types of housing with shared facilities that are subject to other specific Local Plan policies rather than Policy H10 (e.g. student accommodation), as set out in subsequent paragraphs.

7.321 Recent years have seen the development of a new form of rented housing with shared facilities in some parts of London, often known as compact living or co-living. Typically this type of housing comprises 50 or more small flats which contain their own kitchen and bathroom / toilet facilities, but are supplemented by shared facilities such as gyms, other recreation areas, and cafes. In some respects, the format of compact living or co-living can resemble student housing, but the social spaces can be used to market this housing option as a lifestyle choice. Given the presence of shared spaces, these developments do not usually comply with nationally described space standards. The London Plan refers to compact living and co-living as “large-scale purpose-built shared living”. The Local Plan adopts the same term, and regards this form of development as permanent housing provided that the minimum tenancy length is at least three-months.



7.322 Housing with shared facilities is often referred to as houses in multiple occupation (HMOs). House in multiple occupation has a specific meaning under section 254 of the Housing Act 2004. Broadly, a house in multiple occupation is a flat or house that is the main residence for 3 or more occupiers forming 2 or more households and who share a kitchen, bathroom, or toilet. A household is generally a family (or people with relationships equivalent to a family). The Council has adopted an additional licensing scheme for houses in multiple occupation, along with standards for the spaces and facilities they should provide. The types of housing referred to in paragraphs 7.319 and 7.320 are likely to be subject to the Council's HMO standards. Large-scale purpose-built shared living will not be subject to HMO standards in most cases.

7.323 Policy H10 specifically relates to types of housing such as:

- accommodation shared by more than 6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (larger houses in multiple occupation or HMOs and large-scale purpose-built shared living);
- other accommodation with shared facilities where people live long-term (such as hostels for migrant workers), often designated for particular groups, but excluding designated student housing and housing for older people, homeless people and other people with care or support requirements.

7.324 Other policies in this Plan contain specific provisions for some kinds of housing with shared facilities:

- key-worker accommodation such as nurses' homes and hostels is considered in Policies H4 and H5;
- housing for older people, homeless people and other people with care or support requirements is considered in Policy H8;
- student housing (known as purpose-built student accommodation) is considered in Policy H9;
- self-contained houses and flats occupied by a single household are considered primarily in Policies H1, H3, H4, and H7; and
- provisions for hotels and other visitor accommodation (e.g. serviced apartments, apart-hotels and hostels aimed at tourists and backpackers) are considered in Policy IE5.

7.325 The Council will treat houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (small houses in multiple occupation or HMOs in Use Class C4) in the same way as self-contained homes (Use Class C3) to reflect the freedom provided in legislation for changes between these two uses without a planning application.

7.326 The preceding paragraphs should not be regarded as providing detailed definitions or accounts of the legal position. Planning use classes are set out in The Town and Country Planning (Use Classes) Order 1987 (as amended). Provisions relating to licensing of some types of housing are set out in the Housing Act 2004 and related secondary legislation.

Policy H10

Housing with shared facilities (including large-scale purpose-built shared living)

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- A.** The Council will aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with modest space requirements.
-
- B.** The Council will support development of housing with shared facilities provided that the development:
1. will not involve a disproportionate loss of self-contained homes (particularly homes with three bedrooms), having regard to the overall addition to housing supply;
 2. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing;
 3. complies with any relevant standards for houses in multiple occupation, any relevant residential design standards, and relevant elements of Local Plan Policy D3 (Design of Housing);
 4. contributes to creating a mixed, inclusive and sustainable community;
 5. protects residential amenity in accordance with Policy A1;
 6. in the case of large-scale purpose-built shared living, complies with the distinctive London Plan provisions for large-scale purpose-built shared living in addition to the preceding provisions of Part B;
 7. in the case of large-scale purpose-built shared living, provides a contribution to affordable housing in accordance with Policy H4, particularly Part D; and
 8. in the case of other housing with shared facilities such as larger houses in multiple occupation, provides an appropriate contribution to affordable housing in accordance with Policy H4, particularly Parts B, C and E.
-
- C.** The Council will resist development that involves the net loss of housing with shared facilities other than large-scale purpose-built shared living (primarily the loss of houses in multiple occupation) or the self-containment of any part of such housing unless:
1. either it can be demonstrated that the accommodation is incapable of meeting any relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities;
 2. or adequate replacement housing with shared facilities will be provided that satisfies the criteria in Part B above;
 3. or the development converts the existing accommodation to provide self-contained housing (in Use Class C3) including at least one home with 3 bedrooms;
 4. or the development relates to existing affordable housing and provides self-contained affordable homes;
 5. and in the case of proposals satisfying points 1, 2 or 3, the development creates an equivalent or greater amount of floorspace for permanent self-contained housing (in Use Class C3), complies with the nationally described space standard as far as possible, and makes an appropriate contribution to affordable housing, having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.
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Additional housing with shared facilities

7.327 The Council does not anticipate a significant number of proposals for development creating new homes with shared facilities in the form of larger houses in multiple occupation (HMOs). Planning legislation provides freedom for changes in either direction between self-contained homes in Use Class C3 and small houses in multiple occupation in Use Class C4, giving the HMO sector scope to expand and contract in accordance with the relative demand for HMOs and self-contained homes. However, larger HMO proposals may come forward where existing homes are too large or the environment is too poor to attract families, or the owner considers an HMO has the best potential to maximise rental returns.

7.328 As indicated in the introductory paragraphs to Policy H10, a new form of rented housing with shared facilities has recently emerged. This is referred to here and in the London Plan as large-scale purpose-built shared living, but is also known as compact living or co-living. Only two relatively small blocks of large-scale purpose-built shared living have been developed in borough, providing fewer than two-hundred flats in total.

7.329 Despite the limited number of large-scale purpose-built shared living projects developed in the borough, there has however been rapid growth of the private rented sector in the borough over the last 25 years. Consequently, Policy H10 sets out criteria for assessing proposals for development for all types of housing with shared facilities except those covered by more specific Local Plan policies (such as Policy H9 for student accommodation). If the Council receives a significant number of proposals for housing with shared facilities, further details of our approach will be provided in Camden Planning Guidance on housing, and developers will be expected to have due regard to this.

Additional housing with shared facilities and the priority for self-contained homes

7.330 Policy H1 indicates that self-contained housing is the priority land-use of the Plan, while Policy H3 resists proposals involving the net loss of self-contained homes. In addition, Camden's Local Housing Needs Assessment indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a 3 bedroom home. Nevertheless, additional housing with shared facilities contributes towards meeting our housing target, addresses a permanent housing need, and can reduce the pressure for unrelated adults to share existing large homes. Balancing these considerations, the Council will seek to minimise the loss of self-contained homes with 3 bedrooms, and expect any development of shared accommodation that involves loss of self-contained homes to create a net positive contribution to meeting our housing target.

7.331 Where we have allocated sites specifically for self-contained housing in the Local Plan, or have granted permission for self-contained housing, we consider this to be a suitable and deliverable use. Given this Plan's priority land-use, the Council will resist proposals for the development of housing with shared facilities on a site allocated for self-contained homes, or a site that has an existing consent for self-contained housing, unless evidence is submitted to demonstrate that there is no reasonable prospect of a viable development for permanent self-contained housing coming forward within the Plan period.

Space standards and quality of accommodation

7.332 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation and hostels. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. The standards generally apply to housing with shared facilities where a kitchen, bathroom or toilet is shared by multiple households. The Council will resist proposals for development of this type that fail to comply with the relevant minimum standards. Large-scale purpose-built shared living will not be subject to HMO standards in most cases, although other design standards may be relevant.

7.333 Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life. All housing with shared facilities should be designed to minimise risk to health and safety, be practical, and support adaptability and accessibility. Proposals should take account of Policy D1 (Achieving Design Excellence), Policy D3 (Design of Housing), and Policy A2 (Safety and Security). Applicants should consider the Secured by Design principles and guides, and should discuss any scheme with Police Designing Out Crime Officers at the pre application stage. The Council may seek incorporation of measures related to safety and security as part of a management plan secured by a planning obligation.

Creating a mixed, inclusive and sustainable community and protection of amenity

7.334 The Council will consider whether proposals could have an impact on the mix, inclusivity, and sustainability of a neighbourhood. In some locations, the introduction of housing with shared facilities may broaden and enhance the housing mix available in the area. In other locations, development for large-scale purpose-built shared living could skew the population towards particular groups or lifestyles, especially where it adds to an existing concentration of other types of housing with shared facilities, notably student accommodation. The Council will therefore assess proposals for housing with shared facilities having regard to the existing housing mix in the area and any local concentrations of broadly comparable accommodation.

7.335 Policy A1 indicates that we will seek to protect the amenity of the existing and future occupiers and the amenity of neighbours. This protection is as important for the occupiers of housing with shared facilities as it is to other residents and their neighbours. Where the scale of a proposal for housing with shared facilities or additions to an existing concentration of broadly comparable development risks harm to the mix and sustainability of the community or otherwise has potential to harm local amenity, the Council will seek a range of mitigating measures such as management plans secured through planning conditions or obligations. The existing modest developments of large-scale purpose-built shared living in the borough are in town centre locations, and are not known to have created any amenity issues. However, where mitigation measures are not considered sufficient to overcome anticipated harm, such as in locations where there is a history of negative impacts from comparable forms of accommodation, we may resist proposals for development of housing with shared facilities.

London Plan requirements and contributions to affordable housing

7.336 The London Plan sets out a number of specific requirements for development of large-scale purpose-built shared living. Some are similar to the general requirements of Local Plan Policy H10, while others are more detailed. London Plan requirements include retaining the development under single management, minimum tenancy lengths of at least three months, and provision of a range of facilities including internal and external communal amenity space, and laundry and drying facilities. The Council will expect developments of this type to meet the London Plan requirements.

7.337 The London Plan 2021 indicates that all proposals for large-scale purpose-built shared living will be subject to financial viability appraisal, and should make a contribution to affordable housing in the form of a payment-in-lieu. Contributions are expected to be equivalent to delivering a proportion of the rooms at a discount of 50% of the market rent. The payments should be equivalent to 50% of rooms at discounted rent for industrial land and most public sector land and equivalent to 35% of rooms at discounted rent in other cases. Where the payment secured at the application stage is equivalent to required proportion of rooms at discounted rent, no late stage viability review is required.

7.338 The Council will support proposals to offer financial contributions to affordable housing from development of large-scale purpose-built shared living in accordance with these London Plan provisions, but as an alternative we will strongly encourage contributions of self-contained affordable housing on-site in accordance with the guideline mix set out in Policy H4 Part B. We note that it will only be feasible to provide the Policy H4 guideline mix where the affordable housing can be provided in a separate block and / or be accessed from a separate stair / lift core, rather than being fully integrated into the accommodation for shared living.

7.339 The Council anticipates that any other proposals for housing with shared facilities coming forward are likely to take the form of larger houses in multiple occupation (HMOs), although we do not expect there to be a significant number of developments. The Council will also seek payments in lieu of affordable housing from housing with shared facilities other than large-scale purpose-built shared living. We have adopted the payments-in-lieu approach because the Council does not generally seek provision of affordable housing in the form of housing with shared facilities.

7.340 The Council will assess the appropriate contribution to affordable housing in accordance with Local Plan Policy H4 (Maximising the supply of affordable housing), particularly Parts B, C and E. We will take account of the additional housing floorspace proposed and its capacity for self-contained homes. Where there is capacity for 15 or fewer additional homes and the sliding scale target for affordable housing applies, the appropriate contribution will relate to additional housing floorspace, and exclude any space created from conversion of existing self-contained homes.

7.341 Payments-in-lieu should be calculated on the basis of the payment rates set out in Camden Planning Guidance, currently £5,000 per sqm (GIA) multiplied by the affordable housing floorspace target. Applicants may also submit their own financial viability appraisals to indicate an appropriate level of payment calculated on the basis of providing the affordable housing floorspace target at a discount of 50% of the market rent. This approach is similar to the London Plan provisions for large-scale purpose-built living. In cases where applicants submit their own financial viability appraisals, the Council will seek funding from the developer for an independent verification of the appraisals.

Protecting existing housing with shared facilities

7.342 There is limited provision of large-scale purpose-built shared living in the borough at present. Consequently, Policy H10 does not include specific provisions to protect existing provision of large-scale purpose-built shared living. Nevertheless, the general provisions of the Local Plan will apply, and we will seek to protect all permanent residential floorspace in developments of large-scale purpose-built shared living in accordance with Policy H3 (Protecting existing housing).

7.343 The Council protects other forms of housing with shared facilities (primarily houses in multiple occupation) because many individuals and couples in Camden would be unable to access or afford any alternative accommodation. Camden's Local Housing Needs Assessment suggests that a significant proportion of the projected household growth in Camden over the Plan period will involve multi-person households, including unrelated adults sharing, students, multi-family households and households of one family and other unrelated adults.

7.344 Developments leading to a loss of housing with shared facilities have tended to involve either self-containing the existing bedsits (putting pressure on internal space by adding facilities for personal use), converting the property into larger flats, or creating a single large dwelling for one household. Self-containing bedsits reduces the amount of accommodation available to single people and couples with the lowest incomes. Self-containment also tends to involve the loss of access to previously shared spaces, such as kitchens, sitting rooms, gardens, laundries and drying areas, and bathrooms containing a bath. However, a self-contained bedsit itself is rarely large enough to contain a full range of facilities, or to provide space to socialise with visitors.

7.345 Converting a home with shared facilities into a single large dwelling or a number of flats larger than the existing bedsits would reduce the amount of accommodation available to small households on low incomes in the borough and would also be likely to reduce the number of people occupying the property. However, we may support conversions that create 3 bedroom self-contained flats to augment the limited supply of family housing within the existing stock, as set out in the further paragraphs of this section.

7.346 The Council is actively working to improve the quality of accommodation in the private rented sector, particularly houses in multiple occupation. Where such properties do not meet current standards, are in serious disrepair, or have a history of vacancy, the Council will assess the form of renovation or development best able to provide residential accommodation of reasonable quality and may accept self-containment in some circumstances. The Council will consider the extent of the works required to meet contemporary standards, their likely impact on any designated heritage assets, the cost of restoring the property to use (having regard to any fixtures and fittings removed from the property by the owner), the potential rental return from the property, and the prospect of investment coming forward to make the property suitable for occupation as housing with shared facilities.

7.347 Proposals to replace existing bedsit accommodation, or other housing with shared facilities, usually involve relocating it into an existing self-contained dwelling, and converting the shared accommodation into one or more larger self-contained homes. Such swaps can help a developer or owner to meet a demand for self-contained accommodation in a particular location, provide bedsits in a property that can more easily meet contemporary standards, and / or maximise the value of properties in their control. The Council will not resist such swaps as long as the replacement bedsits are in an appropriate location, represent equivalent or better accommodation (in terms of the number of bedsits, the floorspace, and the standard of facilities and amenities), and are secured by a planning obligation.

7.348 Camden's Local Housing Needs Assessment indicates that a substantial proportion of the households needing market housing over the Plan period are expected to require 3 bedroom homes. The Needs Assessment also suggests that there are likely to be many households that need three-bedroom homes but are unable to access affordable housing and unable to afford market housing to rent or buy. In addition, the Needs Assessment confirms that new-build housing is generally more expensive than existing housing. Consequently, the Council will aim to augment the limited supply of family housing within the existing stock by supporting development that involves the net loss of housing with shared facilities (primarily houses in multiple occupation) where this involves a conversion providing at least one 3 bedroom home. Any resulting 3 bedroom homes should have access to external amenity space where possible to support families with children.

7.349 There is a small stock of social rented housing in the borough that takes the form of bedsit rooms with communal facilities. Small homes are over-represented in this sector, and bedsits are unpopular with tenants, especially since they will be sharing facilities with people they do not know, and this may include people with care or support requirements or with challenging behaviour. The Council therefore supports development or remodelling of social rented accommodation with shared facilities to create self-contained low-cost rented homes, subject to the self-contained homes meeting appropriate space standards.

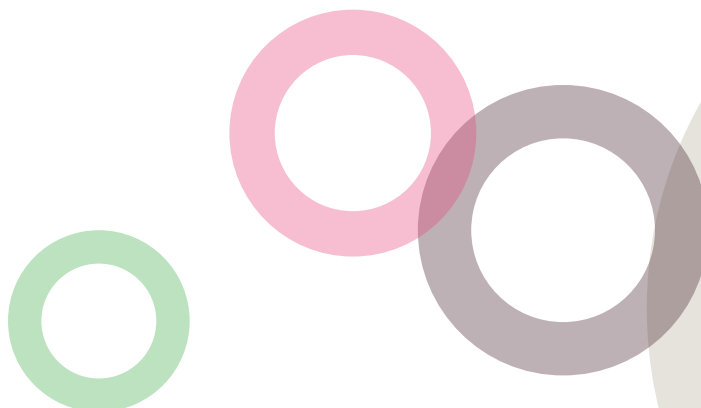
7.350 In some cases, properties in Camden have been subdivided into flats that are not self-contained because the layout of entrance halls and staircases made self-containment difficult or costly. Where these properties are not let out as bedsits and only share circulation spaces, they do not form housing with shared facilities, and the Council will not resist proposals to convert them into wholly self-contained flats provided that they are able create homes of a reasonable layout and quality. Where such proposals would result in a loss of homes, they will be considered against Policy H3.

7.351 Where the loss of housing with shared facilities is justified to the Council's satisfaction, any alternative development should provide an equivalent or greater amount of floorspace for permanent self-contained housing in accordance with Policy H1 (Maximising housing supply) and Policy H3 (Protecting existing homes). The Council will resist proposals for non-residential development in accordance with Local Plan Policy H3 (Protecting existing homes), and resist the conversion of housing with shared facilities into short-term lets or visitor accommodation (such as backpackers' hostels).

7.352 We will expect the self-contained housing proposed to satisfy all relevant Local Plan policies, and comply with the nationally described space standard in accordance with Policy D3 (Design of Housing). We will also expect the development to make an appropriate contribution to affordable housing, in accordance with Policy H4. The Council will negotiate the contribution to affordable housing taking into account all relevant criteria in Part E of Policy H4, and any other material considerations.

7.353 We note that most existing housing with shared facilities has been developed free from the application of any affordable housing requirements, and also that much of the stock provides for relatively low-income tenants with few alternative housing options. Consequently, where smaller developments for self-contained housing are proposed (with capacity for 15 or fewer additional homes), the Council will apply Policy H4 treating all the floorspace proposed as additional housing floorspace. If replacement housing with shared facilities is provided elsewhere, we will consider the appropriate proportion of affordable housing having regard to the quantity and form of housing delivered across both sites.

7.354 As an alternative to provision of a contribution to affordable housing in accordance with Policy H4, we may seek to negotiate nominations to a proportion of the new self-contained housing, to be provided at discounted rents for a specified period. We will particularly support this approach where we are working with the developer to return the property to use following a long history of vacancy. Nominations would be of single people or households with an acknowledged housing need, potentially including people accepted by the Council as homeless, people in temporary accommodation and care-experienced young adults.





Accommodation for Travellers

7.355 Policy H11 seeks to protect existing traveller sites and supports the provision of new sites to help meet the accommodation needs of Camden's established traveller community.

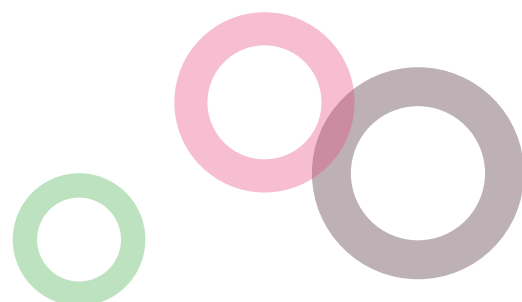
7.356 For planning purposes, the government's 'Planning policy for traveller sites' (2024) sets out definitions of travellers, gypsies and travellers, and travelling showpeople. In summary:

- 'Gypsies and travellers' are other persons of nomadic habit of life whatever their race or origin;
- 'Travellers' means 'travelling showpeople' and 'gypsies and travellers';
- 'Travelling showpeople' are members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such);
- in all cases, people are still included if they have ceased to travel temporarily or permanently, for example due to health or education needs.

7.357 The Council has a responsibility through national planning policy to assess and plan for the housing needs of all residents, including the gypsy and traveller community. There is an established community of travellers in Camden that have lived in the borough for over thirty years, and which we recognise have longstanding connections with local social networks and services. The Council currently provides five traveller pitches (four at Carol Street and one at Castlehaven Road). There is also a private site for travelling showpeople at the Vale of Health, which has been in use since at least the 1950s. Known as the North Fairground site, the yard also hosted a fair on bank holidays until the early 2000s.

7.358 The North Fairground site was owned and operated by a family of Travelling Showpeople until late 2020, when it was sold to an individual with no connection to fairs or showpeople. The number of showpeople living on the site has diminished in recent years, while the number of occupants in unrelated occupations has increased. Provisional findings of the emerging London-wide Gypsy and Traveller Accommodation Needs Assessment do not include any identified need for additional plots for Travelling Showpeople in Camden.

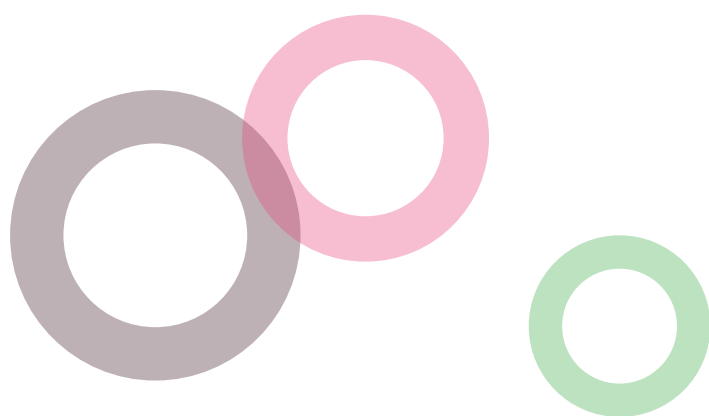
7.359 The Council's approach to meeting the accommodation needs of travellers in Camden is set out in Policy H11.



Policy H11

Accommodation for Travellers

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- A.** The Council will aim to secure a sufficient supply of pitches / plots to meet the accommodation needs of Camden's established traveller community over the Plan period to 2041.
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- B.** We will protect existing lawful sites, plots and pitches for travellers and travelling showpeople. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, pitches and/or plots in suitable locations, or are demonstrably no longer needed.
-
- C.** To help meet the accommodation needs of Camden's established traveller community the following sites have been allocated in the Local Plan to deliver permanent traveller pitches:
1. S20 - York Way Depot and adjacent land at Freight Lane; and
 2. C27 - Land adjacent to Constable House, Adelaide Rd.
-
- D.** The Council will require new sites, pitches and/or plots for travellers to:
1. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
 2. be capable of connection to energy, water and sewage infrastructure;
 3. provide safe access to and from the main road network;
 4. support the health and well-being of occupiers;
 5. provide an appropriate layout and facilities;
 6. provide a good level of residential amenity;
 7. be attractive and of the highest design quality; and
 8. protect local amenity and the environment.
-



Assessing need

7.360 The 2017 Camden Local Plan identified a need for 16 additional traveller pitches to 2031, based on an assessment of need completed in 2014.

7.361 The London Plan 2021 indicates that boroughs should update their gypsy and traveller accommodation needs assessments as part of the Local Plan review process. To inform the review of the London Plan, the GLA are carrying out a London-wide Gypsy and Traveller Accommodation Needs Assessment. The provisional findings of the emerging Gypsy and Traveller Accommodation Needs Assessment identify a need for 11 additional pitches in Camden by 2031/32. The overall need for the period covered by the new Local Plan (to 2041) will however be higher, and is estimated to be 19 additional pitches.

Meeting the need

7.362 The government's 'Planning policy for traveller sites' requires Local Planning Authorities to:

- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets; and
- identify a supply of specific, developable sites, or broad locations for growth, for 6 to 10 and, where possible, for years 11 to 15.

7.363 To inform the preparation of the Local Plan the Council commissioned consultants to undertake a Gypsy and Traveller Site Identification Study to identify Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.

7.364 The study identified 18 parcels of land that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council. Further assessment work has ruled out 16 of these parcels of land on the basis that they are either unsuitable or unavailable. The two remaining parcels of land have been allocated in the Local Plan to help meet the accommodation needs of Gypsies and Travellers in Camden. These sites are set out in Part C of Policy H11.

Assessing proposals

7.365 We will aim to ensure that new sites / pitches are both adequate and appropriate to the needs of the traveller community and integrated with adjoining communities. All proposals for sites, plots and pitches for travellers and travelling showpeople, whether allocated in the Local Plan, identified by the Council or proposed independently, should meet the criteria set out in Policy H11 and the requirements of the government's Planning policy for traveller sites. Proposals will also be expected to satisfy all other relevant Local Plan policies, including those relating to the impact of development and the protection of green infrastructure.

