London Borough of Camden Housing Delivery Test - Action Plan

August 2022



Between 2018/19 and 2020/21 -

We had a target of **2891** new homes to be built in Camden.

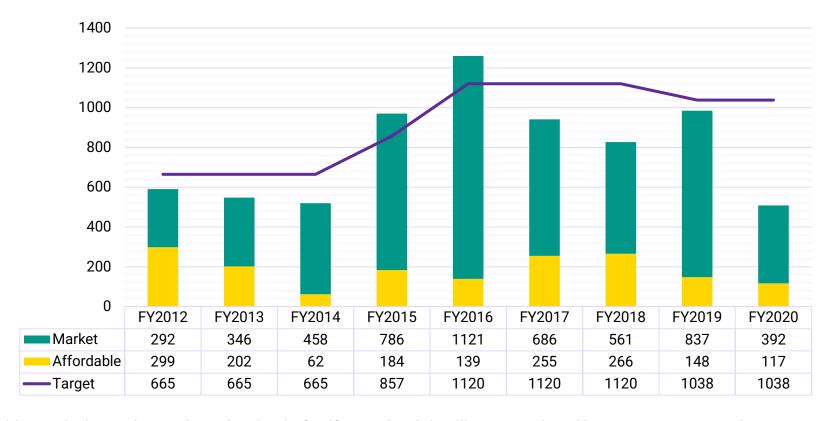
2202 were delivered.



The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities introduced by the government. In 2021, the measurement for Camden was **76**%* - which means that Camden has to produce an action plan and apply a 20% buffer to our 5 year housing land supply.

This action plan identifies the main issues that have affected delivery rates in Camden over the last 3 years and sets out a series of actions that the authority is, or will be, undertaking to try to address them and boost housing delivery within the borough.

*proportion of homes delivered compared to the target



This graph shows the total number (net) of self-contained dwellings completed between 2012/13 and 2020/21. This has then been broken down to show how many market and affordable units were delivered in each financial year. Figures for 2021/22 were not available at the time that the action plan was published.

Format of the action plan

1. Understanding Camden

Sets out information about what Camden is like as a place and some of its challenges and opportunities

3. Delivering new homes

Provides information about the Council's Community Investment Programme as well as outlining some of the delivery challenges that may need to be overcome once permission is granted.

2. Planning in Camden

Explores the development context in more detail including documents within the Development Plan and statistics relating to decision making.

4. Review and next steps

Sets out key actions that the Council will be undertaking over the next 12 months.

1. Understanding Camden



The Camden 2025 vision that the Council developed with it's communities is for..."Camden to be a better borough – a place where everyone has a chance to succeed and where nobody gets left behind."

In 2022 the Council published 'We Make Camden', which builds on Camden 2025 and sets out six key ambitions for the future. We Make Camden also identifies ten big issues facing the borough – including four Camden Missions and six Camden Challenges.

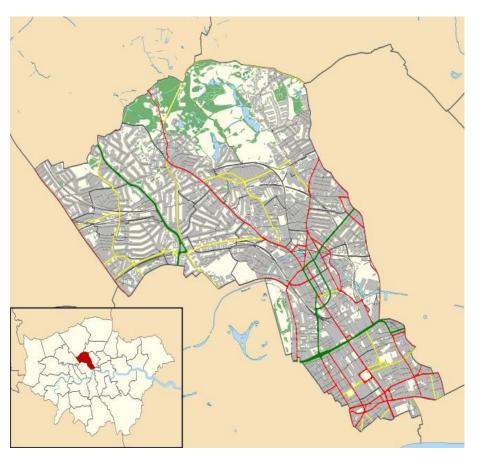
Key to the delivery of housing in the borough is the Council's ambition that "everyone in Camden should have a place they call home" and the challenge to ensure that "Camden has enough decent, safe, warm, and family-friendly housing to support our communities". To deliver this the Council are committed to...

- Increasing the supply of genuinely affordable, family-sized, and social rented homes by building as many as we can ourselves;
- Using all our powers to compel and facilitate more organisations to deliver more affordable, high-quality, family size housing in Camden;
- Focusing our social housing resources to support those most in need in Camden, addressing overcrowding and improving people's health and wellbeing; and
- Reducing rough sleeping by investing in homelessness prevention, outreach and a "housing first" model continuing to buy back our council homes to house homeless residents.

Camden is a borough of immense contrast and diversity. The borough is home to almost a quarter of a million people, a third of a million jobs, and a diverse spectrum of people and places compacted into 22 sq km of central London

Business centres such as Holborn, Euston and Tottenham Court Road contrast with attractive residential districts such as Hampstead and Highgate, thriving Belsize Park, the open spaces of Hampstead Heath, Parliament Hill and Kenwood, the youthful energy of Camden Town, subdivided houses in Kentish Town and West Hampstead, as well as areas of relative deprivation.

The 2021 Census shows that Camden has a resident population of 210,100. Camden has the 6th largest population churn in the UK, due to large migration in and outflows. In the year to mid-2020, ONS estimates total migration inflow to Camden of 41,100 people, a total outflow of 32,600, with the net effect of an additional 8,500 people. A sizeable proportion of movement is the annual transfer of students to/from Camden, both internationally and within the UK.



Camden is a very attractive place to live, which in turn has an impact on the cost of living. The cost of housing in Camden is the third highest in the country. The average house price being £895,902 in September 2021 – 3.2 times the average price for England & Wales and 1.8 times the average price for London. As a result, affordable housing is often cited in Camden's residents' surveys as the factor most in need of improvement in the borough.

At March 2022 there were 7,017 households on the Council's Housing Waiting List of which 67% are showing as living in overcrowded conditions.

In Camden we want to make sure that new homes being built in the borough address the needs of people who have less choice over housing options first. Affordable housing products, especially larger units, can have an influence on a scheme's viability and in certain situations, particularly on commercial schemes, the Council has sought a lower overall number of new homes on a site to secure a greater percentage of affordable units to better address the housing needs of local people.

Every part of Camden has areas of relative affluence alongside areas of relative poverty. The gap in healthy life expectancy between the poorest and richest parts of the borough is too wide – poorer citizens have a significantly shorter life expectancy than those who are better off.

Camden has one of the most dynamic economies in the UK and is home to many global businesses and academic/public institutions. Camden is home to the second highest number of businesses in London after Westminster and is 3rd highest in the UK. There were 37,680 businesses registered in Camden in 2021, a growth of 56% since 2008 and a 2.4% increase on 2020.

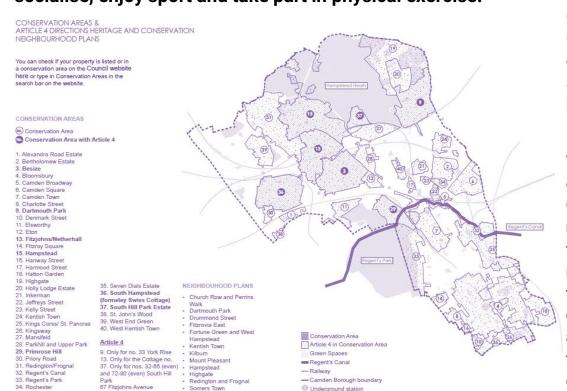


Knowledge Quarter Innovation District and key development sites

Camden's geographic position in central London, and the business environment developed, have enabled it to become one of the most important business locations in the country. Revised ONS estimates of Gross Value Added (GVA) show that Camden added £34.4bn to the national economy in 2018, an increase of 93% on 2008, growing faster than Central London (54%), Greater London (45%) or UK (34%).

Geographically, 60% of jobs are located south of Euston Road; almost a quarter (24%) are concentrated in the central Camden Town/ Euston/Regent's Park/Somers Town areas, while the remainder of Camden's jobs (16%) are scattered across town centres and employment sites in north and west Camden including Hampstead, Kentish Town and Swiss Cottage.

Camden's role as a key employment destination and as home to the Knowledge Quarter Innovation District means that when larger development sites come forward there is pressure for those sites to be used for employment rather than housing. Camden has a rich architectural heritage, almost 50% of the land area falls within a conservation area, recognising their architectural or historic interest and their character and appearance. In addition to the large number of heritage assets there are over 280 designated public and private spaces. These spaces are critical to sustainability and wellbeing providing places to relax, socialise, enjoy sport and take part in physical exercise.

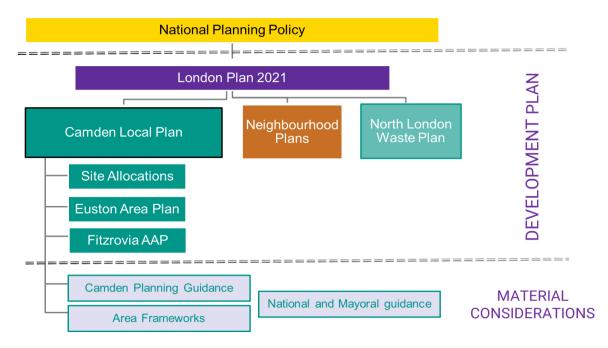


Camden also has large areas of Metropolitan Open Land (MOL) which is important to the whole of London, as well as the Borough, and provides attractive, visual breaks to the built-up area, keeping land permanently open. This designation is broadly equivalent to the Green Belt.

The cumulative impact of historic and environmental development considerations in Camden has an impact not only on the total number of development sites likely to come forward but also on options for their potential redevelopment. The Council knows that sites in the borough need to work harder in terms of delivering more but this needs to be balanced against safeguarding the amenity of residents; the environment; heritage and other characteristics that make a place special.

2. Planning in Camden

Camden's Development Plan



There are a number of plan documents that need to be taken into consideration when assessing developing proposals including the Camden Local Plan 2017 and London Plan 2021. Other plan documents adopted by the Council include:

- Site Allocations Plan 2013
- Fitzrovia Area Action Plan 2014
- Euston Area Plan 2015

Since the Site Allocations Plan and the Euston Area Plan were adopted there have been a number of changes to the planning context and local priorities, as such both Plans are currently in the process of being reviewed and updated by the Council.

There are also currently 7 made Neighbourhood Plans in the borough – the most in London – with more being prepared.

Camden Local Plan 2017

The Camden Local Plan was adopted by the Council in July 2017. The Local Plan is the key strategic document in Camden's development plan. It provides the basis (with other statutory development plan documents) for the Council's planning decisions and sets the framework for future development in the borough allowing the Council to manage Camden's growth to enable the delivery of its priorities and meet the needs of residents and businesses. Policy H1a in the Plan recognises self-contained housing as the priority land use in Camden.

The Plan also sets out a series of ambitious policy requirements to encourage additional homes to be provided as part of mixed use schemes and maximise the number of affordable homes being provided in the borough. Policy H2 for example requires 50% of all additional floorspace over 200sqm to be developed as self-contained housing where it meets set criteria within the Central London Area and designated centres.

There is a legal requirement for all policies in local plans and spatial development strategies to be reviewed at least once every five years to assess whether they need updating, and to then update them as necessary. The assessment should include consideration of changes to local circumstances and national policy. The Council has commenced an update of the Camden Local Plan, with initial public engagement on the Local Plan review envisaged to take place at the end of 2022.

The Council has adopted a suite of supplementary planning documents alongside the Local Plan.

These documents set out further detail about how the policies in the Plan should be applied. In March 2022 the Council adopted a Planning Statement on the Intermediate Housing Strategy

and First Homes and in January 2021 the Council updated the Camden Planning Guidance document for Housing. The update increased Payment in Lieu (PiL) rates for offsite affordable housing and market housing (Policies H2 and H4) and provided more flexibility for off-site provision to reduce reliance on PiL.

Site Allocations Plan Review

The new Site Allocations Local Plan builds on Camden's existing Development Plan by setting out policies for how identified areas/sites should be developed in the future. Each policy is unique so that it can respond to local and site specific issues and opportunities. Policies set out things like proposed land uses, key design considerations and how many homes the site should deliver.

In preparing the Site Allocations Local Plan the Council identified and assessed over 220 sites. The majority of sites discounted through the assessment process had either recently been developed (or were due to be completed soon) or had an anticipated capacity (net gain) of less than 10 residential units or a 1000sqm employment floorspace.

The emerging plan allocates over 90 individual development sites throughout the borough. Consultation on the draft Site Allocations Local Plan took place in Spring 2020, with further engagement undertaken in December 2021/January 2022. The Council now intends to progress the Site Allocations Local Plan alongside the Local Plan review.



In total the plan identifies land for over 10,000 new homes (although it should be noted that some of the allocated sites in the plan already have planning permission).

Area Frameworks

Over the last few years the Council has been preparing a number of supplementary planning documents to help bring forward development in the boroughs designated growth areas.

These frameworks set out a range of design/planning principles and infrastructure requirements. Local stakeholders such as residents, businesses and landowners are/have been involved in the preparation of the framework documents to ensure that principles set out within them are appropriate.

Area frameworks are a material consideration and have been used to help shape pre-application discussions and planning applications.



Kentish Town Planning Framework

- ➤ Adopted in July 2020
- ➤ Now a material planning consideration



Canalside to Camley Street SPD

- Adopted as an SPD in Nov 2021 following extensive community engagement.
- ➤ Now a material planning consideration



Gospel Oak to Haverstock Community Vision

- ➤ Early engagemen kicked off in autum 2020.
- Consultation on the draft Vision took place at the end of 2021 and finished in Jan 2022
- Fine draft vision is now being updated and the final Community Vision is expected to adopted as an SPD in autumn 2022.



West End Lane to Finchley Road SPD

- Adopted as an SPD in Sept 2021 following extensive community engagement.
- ➤ Now a material planning consideration.

Euston Area Plan

Strategic Principle EAP1 in the 2015 Euston Area Plan states that between 2,800 and approximately 3,800 additional homes along with the provision of appropriate replacement homes across the plan area in a mix of unit sizes. The Plan also states that at least 75% should be provided as permanent self contained homes.



Euston Area Plan Review:

The Euston Area Plan (EAP) is the key planning document for Euston. The plan was jointly developed by Camden Council, the Greater London Authority and Transport for London and adopted in 2015. A lot has happened since and in order to ensure that policies reflect up to date information, constraints, opportunities and local priorities we are undertaking a partial update to the EAP. Areas of the focus are:

- Viability and constraints
- Euston Station design
- Land use
- Sustainability
- Health and well-being

Decision making in Camden

The Planning Service at Camden work to an expectionally high standard and consistently work pro-actively with applicants to secure high quality development that meets the aims and ambitions of the development plan and improves the economic, social and environmental conditions of the area.

Throughout the Covid-19 pandemic the Planning Service has worked hard to ensure that applications can continue to be determined and that pre-application discussions can still take place - including the use of video conference software to host planning committees and design review panels.

In quarter 1 of the 2022/23 financial year 775 applications and 76 pre-apps were submitted. This is a reduction on the 906 applications received in quarter 1 of the 2021/22 financial year and may be a reflection of the level of uncertainty in the economy at present.



Local planning authorities should approach decisions on proposed development in a positive and creative way. They should... work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

NPPF - Paragraph 38

The number of dwelling units permitted in Camden has varied a lot over the last 10 years. In the years 2012/13 and 2014/15 the high number of new dwellings permitted is primarily due to schemes involving student accomodation1 coming forward in the borough and a handful larger residential applications being taken forward by the Councils Community Investment Partnership (CIP)

team. 1 Historically student units used to equate to one dwelling in terms of delivery calculations but this has now changed. The current calculation is 2.5 non-self contained units = 1 dwelling.

In the last 4 years the number of new homes being approved has fallen below the number of new homes needed to meet our housing target. This is due to a number of factors including:

- Increased number of applications for non-residential uses coming forward outside of town centres and the Central Activities Zone (as well as inside)
- Larger growth sites taking longer to reach the application stage than expected
- Prioritising the delivery of affordable homes when negotiating new housing as part of a primarily commercial scheme (Local Plan Policy H4)



Planning obligations

The Community Infrastructure Levy (CIL) is a charge collected from new developments, which funds facilities such as:

- roads and transport
- education
- medical
- sport, recreation and open spaces

The CIL applies to all proposals which add 100m2 of new floorspace or an extra dwelling. This includes bringing vacant buildings back into use. The amount to pay is the increase in floorspace (m2) multiplied by the rate in the CIL charging schedule.

Camden collects two types of CIL: the Mayoral CIL and the Camden CIL.

The Council adopted a new Community Infrastructure Levy Charging Schedule in 2020.



Having the right infrastructure provided at the right time is essential to supporting additional housing and ensuring that existing residents see the benefit of additional housing. Camden CIL is essential in helping to facilitate these infrastructure improvements. Camden CIL is spent as follows:

- 70% on strategic projects across Camden
- 25% on local projects
- 5% on administration costs

This approach is set out in more detail in the Council's Infrastructure Funding Statement, which is updated annually.

Delivering new homes

Potential delivery issues

Camden is a relatively built up borough in the inner London area and there are almost no greenfield site opportunities – other than some small scale infill sites on existing estates, which means that the vast majority of new development takes place on brownfield sites that are already in some form of use. Developing a brownfield site generally means that the initial site preparation stage of a development will take longer as existing uses may need to be moved to an alternative site/or a different part of the site to enable preparation works including partial/full demolition of buildings to take place.



There are also issues where larger development sites are in multiple ownerships or there are small pieces of land blocking a larger development proposal from coming forward.

King's Cross is one of the largest and most exciting redevelopments in London. The 67-acre site has a rich history and a unique setting. What was an underused industrial wasteland is being transformed into a new part of the city with homes, shops, offices, galleries, bars, restaurants, schools, and even a university.

To date 1532 units have been either been completed or meaningfully commenced and there are still several development parcels to come forward with a reserved matters planning application.



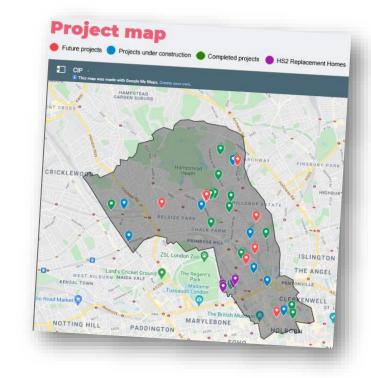
Community Investment Programme

The Community Investment Programme (CIP) is an ambitious plan by the Council to invest over £1 billion in homes, schools and community spaces in Camden. It's our answer to government spending cuts – an innovative way to continue to building in our communities despite massive reductions in central government funding.

Through the programme we're building 3,050 new homes, including 1,100 council homes and 300 at genuinely affordable Camden Living rents. We're also investing in 48 schools and children's centres and providing 9,000m2 of improved community space – the equivalent of 35 tennis courts.



CIP is helping to fund improvements to 22,500 existing council homes as part of the Council's Better Homes Programme. Each scheme is designed in partnership with residents and delivered directly by Council, this gives local people the chance to have their say and shape plans for their community.



To date we have built 1,160 new homes through CIP and have housed over 1,028 people, including 453 children.

We have built 618 council homes and Camden Living Rent homes for key workers and bought back 70 council homes through TAPP.

We've invested £165 million into schools and children's centres including the completion of three new primary school buildings. We've also built new community facilities like the St Pancras Community Centre and the Greenwood Centre - Camden's first Centre for Independent Living, run by disabled people, for disabled people. As well as refurbishing old hostels into state of the art accommodation and training facilities for homeless people.

In addition to CIP, we have built a further 99 council homes paid for by HS2, allowing tenants of blocks subsequently demolished by HS2 to move directly into right size new homes on the Regent's Park Estate and building an additional 33 council homes.



Camden Living Rent homes

The Council are currently in the process of building 300 Camden Living Rent homes to make it possible for teachers, nurses and local people earning around £30,000 to £40,000 to afford to rent in Camden. It's our way of helping people who may not qualify for a council home but who also struggle to afford the cost of renting or buying on the open market. These homes for lower rents help maintain Camden's mixed communities and provide greater security to tenants than the private rented sector.



4. Conclusions/Next steps

Main barriers to housing delivery in Camden

The need to make sure that the types of homes coming forward are fit for purpose and meet needs

Competition for land

against other more profitable land uses



Availability of sites and scope for their redevelopment



Length of time

taken for applications for larger scale **development sites**

to come forward



Key actions	Timescale	Responsibility
Support the Community Investment Programme across DM, Planning Policy and Regeneration and Place to implement their ambitious programme of development in the borough	Ongoing	LB Camden Planning Service
Resist applications for commercial developments outside of the Central Activities Zone, Knowledge Quarter and designated town centres.	Ongoing	LB Camden Planning Service
Keep indicative capacities for development sites under review within emerging plan documents.	Ongoing	LB Camden Planning Service
Explore opportunities to use technology to monitor housing delivery and predict future completions more effectively.	Ongoing	LB Camden Planning and IT Services
Progress the review of the Camden Local Plan, the Site Allocations Local Plan and the Euston Area Plan.	Ongoing	LB Camden Planning Service
Use existing relationships and networks with landowners, developers and agents to gather market intelligence and identify potential barriers/challenges to housing delivery.	Quarterly	LB Camden Planning Service
Ensure that the planning service is suitably resourced (including specialists) so that comprehensive advice can continue to be provided in a timely way throughout the pre-application and planning application process.	Ongoing	LB Camden
Continue to make the case to the Government for greater support and funding to enable more local authority-led house building.	Ongoing	LB Camden
Explore opportunities to use our compulsory purchase powers as a way to accelerate the delivery of key housing sites.	Ongoing	LB Camden

Planning Policy and Implementation

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