

# CAMDEN GOODS YARD

A stylized, minimalist illustration of a building facade. It features two rows of arches. The top row consists of five arches of varying sizes, with the text 'CAMDEN GOODS YARD' written in a light, sans-serif font across them. The bottom row consists of five larger arches. The entire illustration is rendered in shades of red and white against a solid red background.

## **CAMDEN GOODS YARD**

PLANNING STATEMENT

MARCH 2025



Quod

---

# Planning Statement

Camden Goods Yard  
development, Chalk  
Farm Road, NW1 8EH

St George West  
London Limited

---

MARCH 2025

Q210508

# Contents

---

1	Introduction	1
2	Get Britain Building: An agenda for growth and change	5
3	Camden's Housing Needs	15
4	The Site	21
5	The Approved Development	24
6	The Proposal	28
7	The S73 Application Documents	34
8	The Development Plan	36
9	Planning Considerations	41
10	Public Benefits and the Planning Balance	48
11	Section 106 Deed of Variation: Draft Heads of Terms	56
12	Conclusion	57

Table 3-1 - Camden Housing Summary	15
Table 3-2 - Camden Housing Delivery Deficit	16
Table 3-3 - AMR Table 5 Affordable Housing Delivery Deficit	17
Table 3-4 - Camden Affordable Housing Delivery Deficit	18
Table 5-1 - Approved Development	27
Table 6-1 - Proposed Housing Mix	29
Table 6-2 - Non-residential floorspace	29
Table 6-3 - The Approved and Proposed Development	31
Table 6-4 - Approved and Proposed Building Heights	32
Table 6-5 - Approved and Proposed Playspace	33
Table 7-1 - Application Documents	34
Table 9-1 - Proposed Housing Mix (Tenure Split)	42

Figure 4-1 - Former Camden Goods Yard Site Location Plan	21
Figure 4-2 - Current Camden Goods Yard Site Location Plan	22
Figure 5-1 - Main Site Consented Building References and Heights	26

**Appendix 1** – Description of development for purposes of consultation

**Appendix 2** - Authority Monitoring Report (AMR) 2024

**Appendix 3** – Camden Housing Expenditure

**Appendix 4** – Households in Temporary Accommodation (2023)

**Appendix 5** – Cabinet Report for Better Homes (14th October 2024)

**Appendix 6** – GLA Housing and Land Research Note

**Appendix 7** – Planning History Schedule

# 1 Introduction

---

- 1.1 This Planning Statement accompanies a planning application ('the S73 Application') submitted under Section 73 of the Town and Country Planning Act 1990 (as amended) on behalf of St George West London Limited ('St George') (the 'Applicant') to the London Borough of Camden (the 'Council'), referred to the Greater London Authority ('GLA') in respect of the Camden Goods Yard development, Chalk Farm Road, NW1 8EH (the 'Site'). The Site area comprises 3.26ha.
- 1.2 Detailed planning permission was first granted for redevelopment of the Site on 18<sup>th</sup> July 2018 under planning permission ref. 2017/3847/P (the 'original planning permission'). The planning permission has been implemented, and revised, and construction has commenced on site. The operative planning permission for the Site is planning permission ref. 2022/3646/P, dated 29th March 2023 (the 'Operative Permission').
- 1.3 However, since 2018 there have been significant changes in development economics nationally, and at the site due to regulatory changes and other matters including build cost inflation; Part L energy / carbon; Part F & O ventilation; Part S electric car charging; Part B 2nd stair and fire safety; Part P electrical safety; 2nd stair efficiency; finance costs, taxation increases and net zero carbon contributions.
- 1.4 Due to requirements to update the scheme to reflect Fire Safety Regulations (BS991), and respond to macroeconomic circumstances, St George has had to propose revisions to the scheme and propose a revised affordable housing offer to ensure deliverability of the site as a whole. This accords with the government's policy to 'Get Britain Building' and the Mayor of London's 'Accelerated Housing Delivery' planning and housing note, December 2024.
- 1.5 As we explain in Section 2, both the Rt Hon Sir Keir Starmer KCB KC MP (the 'Prime Minister'); and the Rt Hon Angela Rayner, Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government (the 'Secretary of State') have issued many ministerial statements recently encouraging the delivery of new homes 'now' to stimulate and accelerate economic growth to address the national housing crisis and the one in London.
- 1.6 This application responds to those directions.
- 1.7 To continue to invest in the site beyond St George's existing commitment for Buildings A and B (218 private and 60 affordable homes) plus a new Morrisons Supermarket, St George must find a way to mitigate the commercial risks and improve the viability of the project.
- 1.8 St George is a subsidiary company of the Berkeley Group. This is one of many large and complex sites across London which the Berkeley Group is investing in. The business is therefore continuously reviewing its priorities and investment accordingly. Because of this, some sites may be delayed or slowed down until their viability improves and the commercial risk can be managed.

- 1.9 Given the recognised need to accelerate housing delivery, the immediate urgency of the housing crisis, and the programme for construction on Site, it is critical that the S73 Application is determined within the statutory period of 16 weeks.
- 1.10 The following conditions attached to the Operative Permission control development and are the subject of this S73 Application:-
- **Condition 3, 4 and 6** - approved drawings and documents – these contain drawings which identify affordable homes (references amended) and new drawings are submitted to comply with fire regulations.
  - **Condition 5** - contains drawings which identify affordable homes (references amended). The condition also refers to the ‘*affordable housing statement (June 2017)*’ which is amended.
  - **Condition 73** refers to ‘*203 affordable*’ homes. This will be revised to ‘*83 affordable homes*’.
- 1.11 The positive consequence of the S73 Application is that the development meets Fire Safety Standards; and will secure the delivery of the whole site including 83 affordable homes overall and the other many public benefits of the scheme.
- 1.12 Condition 73 also refers to a total of 27,983sqm GEA of non-residential floorspace. This is revised to 28,792sqm, a de-minimis increase of 809sqm following re-measurement of the scheme and marginal building footprint increase to building E1. We also note that the 2,680sqm GEA of ancillary (residential) floorspace (gym, concierge, plant room, parking and energy centre) previously referred to in condition 73<sup>1</sup> has unintentionally been omitted from the Operative Permission and is proposed for reinsertion for consistency, revised to 2,769sqm GEA.
- 1.13 The description of development of the Operative Permission is provided below.

*Variation of Conditions 3, 4, 5, 6 (approved drawings and documents) and 73 (Number and mix of residential units) of planning permission 2017/3847/P dated 15/6/18 (as amended by 2020/0034/P dated 05/05/2020, 2020/3116/P dated 03/12/2020, 2022/0673/P dated 23/02/22, and 2022/3646/P dated 29/03/23) for the redevelopment of petrol filling station (PFS) site to include the erection of a new building to accommodate flexible retail/food & drink floorspace (Class A1, A3 uses), Class B1 floorspace; with cycle parking, public space, public toilets and other associated works and highways works; all following demolition of existing petrol filling station. Use for a foodstore (Class A1 use) with associated car parking for a temporary period. Redevelopment of the main supermarket site to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) for new homes (Class C3 market and affordable) together with non-residential floorspace comprising foodstore (class A1), flexible retail/food & drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, cafe and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works,*

---

<sup>1</sup> 2020/3116/P, dated 3<sup>rd</sup> December 2020

*including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore'. This application is accompanied by an addendum to the original Environmental Statement.*

- 1.14 For the purposes of public consultation only, a description of the proposed S73 application is enclosed at **Appendix 1**.
- 1.15 An EIL Statement of Conformity to the Environmental Statement has also been submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 1.16 The application is referable to the Mayor of London for planning permission without complying with conditions subject to which a previous planning permission was granted (a 'section 73 application') which is a PSI application; and (b) which is received by a local planning authority for a London borough on or after 6<sup>th</sup> April 2008.
- 1.17 This statement considers the following matters:-
- **Section 2 – Get Britain Building:** An agenda for growth and change considers the many and recent ministerial statements from government which expect urgent and accelerated housing delivery.
  - **Section 3 – Camden's Housing Needs:** Assesses the acute housing needs in Camden and the poor delivery record to date.
  - **Section 4 – The Site**
  - **Section 5 – The Approved development:** Reports on the development approved to date under the Operative Permission.
  - **Section 6 – The Proposal:** Considers the proposed development and compares this with that already approved.
  - **Section 7 – The Application documents:** Lists the application documents cross referenced against the Council's validation requirements.
  - **Section 8 – The development plan:** Considers the out-of-date local plan, and weight attached to the London Plan.
  - **Section 9 – Planning considerations.** Assesses the various planning issues raised by the proposals.
  - **Section 10 – Public benefits and the planning balance**
  - **Section 11 – Conclusions**
- 1.18 For the reasons set out in full in this planning statement, planning permission should be granted, without delay, because of the following material considerations.
- The presumption in favour of planning permission applies in this case.
  - The Council's local plan is out of date.
  - The Council has failed its Housing Delivery Test.
  - The Council has failed to maintain a five-year supply of housing land.
  - Housing need is as acute in Camden, as anywhere in the country.

- Self-contained housing is the priority land use in Camden.
- There are social, economic and environmental impacts arising from not delivering enough homes in the borough. This includes child homelessness, and significant expenditure on temporary housing by the Council.
- The S73 Application will secure much needed homes for the borough including much needed affordable housing.
- The S73 Application proposes a beneficial housing mix including 15% 3 and 4 bed family homes, some 94 homes in total, of which 11 are London Affordable Rent.
- The S73 Application will secure a deliverable scheme and deliver many public benefits including:
  - Completion of the masterplan comprising 359 homes (of which 23 are London affordable rent and 60 Intermediate Rent); new Juniper office building and retail floorspace (13,797sqm); and new retail, offices, workspace (including affordable workspace); community facility; food growing; civic space; green amenity space; public play space; car club; and blue badge.
  - Redevelopment of brownfield land to create a mixed-use urban neighbourhood, contributing to Camden's housing need.
  - A masterplan which introduces a bold, confident identity with varied building heights and a thoughtful architectural approach that aligns with the surrounding cultural context of Camden.
  - Variety of public spaces, from green spaces to play areas, improving connectivity and providing environmental and social benefits.
  - A balanced mix of commercial spaces, including a new supermarket, will support the local economy and create new job opportunities.
  - New pedestrian and cyclist routes to promote sustainable mobility.
  - Crime prevention measures are embedded in the design to create a safe, vibrant, mixed-use community, catering to both day and night-time activities.

1.19 In accordance with paragraph 125c of the Framework, planning permission should be granted.

## 2 Get Britain Building: An agenda for growth and change

---

- 2.1 There is a strategic context to this S73 Application which is material to its determination, and which supports the grant of planning permission. This context, which includes an agenda for growth and change, should be read alongside the acute housing needs of the Council, which we assess in Section 3.
- 2.2 Within this section, we consider the following matters:-
- Economic challenges
  - Investment to date
  - Ministerial statements
  - Prime Minister and Secretary of State
  - Stronger emphasis on the value of brownfield land
  - The need for housing in London
  - Accelerated housing delivery
  - The Framework
  - Sustainable development

### Economic Challenges

- 2.3 Since the original grant of planning permission in 2018 there have been significant changes in development economics nationally, and at the site due to regulatory changes and other matters including build cost inflation; Part L energy / carbon; Part F & O ventilation; Part S electric car charging; Part B 2nd stair and fire safety; Part P electrical safety; 2nd stair efficiency; finance costs, taxation increases and net zero carbon contributions.
- 2.4 There are significant pressures on the scheme's development economics which have been expressed to the Council. Other potential financial pressures may include the proposed building safety levy.
- 2.5 St George has been in discussions with the Council for some time regarding changes to accommodate fire safety regulations and the resulting impacts this will have on lost saleable residential floorspace as well as wider macroeconomic constraints.
- 2.6 To ensure that the Operative Permission meets Fire Safety Regulations (BS991), to secure continued deliverability overall, and to address the agenda for change set out by the Prime Minister to keep building, St George has positively responded with this S73 Application.



## Investment to Date

- 2.7 Following the grant of planning permission, St George commenced delivery of the original permission and has invested very significantly in the site to date.
- 2.8 It has cleared buildings from the main site, demolished the PFS, constructed a temporary Morrisons store, and is currently constructing Building A (110 private homes), Building B (108 private homes and 60 affordable homes<sup>2</sup>), a new Morrisons Supermarket (19,963 sqm GEA) and 3,563sqm (GEA) of offices, 179sqm (GEA) of workspace and 84sqm (GEA) of affordable workspace, and 359sqm (GEA) of retail floorspace; and urban farm (1,435sqm GEA). This is known as Phase 1.
- 2.9 Due to the events of the past 5 years and the negative outlook for the next 12-24 months means that to continue to invest in the site beyond St George's existing commitment requires St George to find a way to mitigate the commercial risk and improve the viability of the project.
- 2.10 This is one of many complex sites across London which the Berkeley Group is investing. The business is therefore continuously reviewing its priorities and investment accordingly. Because of this, some sites may be delayed or slowed down until their viability improves and the commercial risk can be managed.
- 2.11 As we discuss below, the Prime Minister encourages building, rather than delay, seeking accelerated delivery. St George has responded to this policy.

## Ministerial Statements

- 2.12 Since July 2024, the new Government, and the Chief Planner, have issued several statements to '*Get Britain Building*', identifying the housing crisis that we face, and a very clear response to it.
- 2.13 The statements are summarised below and are expanded upon in this section.
- The King's Speech, background notes, 17th July 2024
  - SoS statement to parliament on building homes, 30th July 2024
  - SoS written ministerial statement "Building the homes we need", 30th July 2024
  - SoS letter to Councils "Playing your part in building the homes we need", 30th July 2024
  - Chief Planner Letter, 2nd August 2024
  - Brownfield passport policy, 27th September 2024
  - PM speech on a 'Plan for Change', 5th December 2024
  - PM 'Plan for Change', 5th December 2024
  - Matthew Pennycook statement 'Building the homes we need', 12th December 2024
  - SoS letter to Councils "Building the homes we need", 12th December 2024

---

<sup>2</sup> Intermediate rent

- Chief Planner Letter, 13th December 2024

- 2.14 These ministerial statements apply to this application, and have informed the new Framework, published in December 2024, the key components of which we discuss in this statement.
- 2.15 The ministerial statements and written correspondence are material considerations which carry great weight and inform the decision maker of the clear direction of travel expected by the government.

## Prime Minister and the Secretary of State

- 2.16 The King's Speech and briefing papers, delivered on 17<sup>th</sup> July 2024 set out the government's intent to get Britain building and to *'accelerate the delivery of high-quality housing'*. The speech recognises that the current planning regime acts as a major brake on economic growth and that more housing that communities need must be unlocked as an enabler of growth.
- 2.17 The Secretary of State made a statement to the House of Commons on the 30<sup>th</sup> July 2024<sup>3</sup> outlining the government's plan to get Britain building, confirming that *'delivering economic growth is our number one mission'*, setting out *'a radical plan to not only get the homes we desperately need but to also drive the growth, create jobs and breathe life back into our towns and cities'*.
- 2.18 The Secretary of State confirmed that *'we're facing the most acute housing crisis in living memory; 150,000 children in temporary accommodation; nearly 1.3 million households on social housing waiting lists; under 30s less than half as likely to own their own home, compared to in the 1990s; and total homelessness at record levels'*.
- 2.19 The Secretary of State sets out a national increase in housing delivery, making it clear that the government will intervene where there is persistent failure to deliver new homes. The Secretary of State's ministerial statement *'Building the homes we need'*<sup>4</sup> sets out the following policy objectives:-
- *'Sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people'.*
  - *'Nowhere is decisive reform needed more urgently than in housing'.*
  - *'We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home'.*
  - *'Reforms to fix the foundations of our housing and planning system – taking the tough choices needed to improve affordability, turbocharge growth and build the 1.5 million homes we have committed to deliver over the next five years'.*
  - *'Updating the standard method and raising the overall level of these targets – from around 300,000 to approximately 370,000'.*

---

<sup>3</sup> Secretary of State statement to the House of Commons, 30th July 2024

<sup>4</sup> Secretary of State's ministerial statement *'Building the homes we need'*

- *'If we have targets that tell us how many homes we need to build, we next need to make sure we are building in the right places. The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes'.*
- *'There is no time to waste. It is time to get on with building 1.5 million homes'.*

2.20 On the same day, the Secretary of State wrote<sup>5</sup> to all local authority leaders and chief executives in England confirming the following:-

- As the Prime Minister explained on the steps of Downing Street, the government's work is urgent, and *'in few areas is that urgency starker than in housing'.*
- *'As a nation we find ourselves in a dire situation given the depth of the housing situation'.*
- Examples of this are record numbers of homeless children placed in temporary accommodation; waiting lists for social housing; and lack of affordability of home ownership.
- *'There is not only a professional responsibility but a moral obligation to see more homes built'.*

2.21 Most recently on 5<sup>th</sup> December 2024, the Prime Minister issued a statement<sup>6</sup> to *'launch a golden era of building'.* He set out the following objectives for the country:-

- *Britain is in the grip of the worst housing crisis in living memory. For too long, the country has been held to ransom by the blockers and bureaucrats who have stopped the country building, choked off growth and driven prices through the roof. They're suffocating the aspirations of working families and obscuring the future of our country. Those days are over.*
- *Take our planning system — urgently in need of decisive reform after decades of becoming increasingly ruinous. House prices have gone through the roof as home-building has gone through the floor. Last year, the number of homes granted planning permission fell to the lowest for a decade, and the average home now costs eight times the annual earnings of an average worker.*
- *It's no wonder home ownership for 19 to 29-year-olds has more than halved since 1990. And, disgustingly in 21st-century Britain, there are more than 150,000 children, the highest on record, in temporary accommodation, without a safe and permanent home. Since 2019, the number of our veterans that are homeless has increased by more than a quarter. This is a shame and a failure of our politics that my government will not tolerate.*
- *But this government's aim isn't to continue our path of managed decline, suggesting easy targets we know we can deliver to boast of our success while people continue to struggle. The entire point of this goal is to throw down a gauntlet — it's a challenge for the government, Whitehall, housebuilders, councils and everyone else to stretch ourselves to the max to meet the scale of the challenge we face.*

---

<sup>5</sup> Secretary of State letter to all local authority leaders and chief executives in England, 30th July 2024

<sup>6</sup> Sir Keir Starmer statement 'Golden Era'

2.22 The government has made it clear that it expects development to come forward on brownfield land first and has strengthened policy to support this approach which we discuss below.

### Stronger emphasis on the value of brownfield land

2.23 In recognition of the national, regional and local importance of using suitable brownfield land within settlements for homes and other identified needs to achieve the aims of sustainable development, the Framework specifically applies substantial weight<sup>7</sup> to this policy. It now also includes a new policy in Chapter 11 of the Framework (Making Effective Use of Land) paragraph 125(c) that proposals should be approved unless substantial harm would be caused elevating the substantial weight to an ‘*approval*’. The paragraph is copied in full below to include the additional wording:

*“125. Planning policies and decisions should: ...*

*c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;...”* [Quod emphasis]

2.24 This introduces a ‘positive test’ for development proposals on brownfield land, i.e. proposals should be approved unless substantial harm would be caused. As noted, this test is not merely ‘*harm*’, but ‘*substantial harm*’.

2.25 The government’s approach is explained in the government’s Framework Consultation Response 2024 which states that ‘*Having carefully considered the responses received, we propose to implement a change to place even stronger emphasis on the value of brownfield redevelopment, but with amended wording to clarify the intent – that proposals for development on brownfield land should be approved unless substantial harm would be caused.*’<sup>8</sup> [Quod emphasis].

2.26 We consider whether substantial harm is caused by the S73 Application elsewhere in this statement, concluding that it does not. The proposals should therefore be approved.

2.27 The Framework establishes clear policy objectives to first prioritise brownfield land, make as much use as possible of brownfield land<sup>9</sup>, avoid building at low densities and optimise<sup>10</sup> the use of surplus brownfield land in accessible locations. This is to ensure that homes are built in the right places and to allow people to live near the services they rely on, making travel patterns more sustainable. Again, as we explain in this statement, this is exactly what the S73 Application delivers.

---

<sup>7</sup> Framework paragraph 125 (c)

<sup>8</sup> Government’s response to the Framework consultation, Question 20 response

<sup>9</sup> Framework paragraph 124

<sup>10</sup> Framework paragraph 130

2.28 More recently the government issued a policy paper<sup>11</sup> on '*Brownfield Passport: Making the Most of Urban Land*'. This policy paper reinforces the government's approach to brownfield land. Whilst the passport element is new, the importance of making the most of urban land is a long standing and existing policy objective already interwoven into the Framework. We set out the key findings of the paper below.

2.28.1 Our cities and towns are at the heart of modern Britain. They are the engine rooms of our economy, fantastic places to live and work, and vibrant destinations for leisure and tourism.

2.28.2 The government wants to see our cities and towns flourish, which means making sure there are enough homes to support further growth – and that these homes are affordable.

2.28.3 The government wants our urban centres to grow in a way which delivers long-term prosperity, with sustainable patterns of development, meaning that homes are close to jobs, and take advantage of places with good connectivity.

2.28.4 Sustained economic growth is this government's most important mission because it is the only route to improving the prosperity of our country and the living standards of working people.

2.28.5 The government has been clear that the first port of call for development should be brownfield land.

2.28.6 It is with these goals in mind that the government has proposed some immediate changes to national planning policy, including being explicit that the development of brownfield land should be regarded "*as acceptable in principle*".

2.28.7 Making the most of urban brownfield land through the planning system matters for multiple reasons. The government wants to deliver the homes and other development the country needs in a way that draws as much as possible on existing infrastructure and access to jobs. '*And it is clear that many parts of our cities and towns could be put to better use: transforming derelict sites that are a blot on communities into valued parts of the urban fabric, and pursuing higher density, well-designed development in suitable and sustainable locations*'<sup>12</sup>. This makes sense not just for social and environmental reasons, but for economic ones too, given that bigger cities drive greater productivity.

2.28.8 Given our relatively low densities, there is scope in many areas for increases. '*While such increases should take account of local character, existing character should not be used to block sensible changes which make the most of an area's potential, and which can create sustainable, well-designed and productive places to live and work*'<sup>13</sup>.

---

<sup>11</sup> The paper forms part of a series of working papers on different aspects of planning reform, designed to inform further policy development in collaboration with the wider sector.

<sup>12</sup> Brownfield Passports, '4 Our Objectives', page 3

<sup>13</sup> Brownfield Passports, '5.2 Scale of Development', page 4

2.29 Moreover, it is relevant that the 30 July 2024 Ministerial Statement on Building in the Right Places provides strong support for the development of Brownfield Land such as the Site. It states that:

*'... The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes; ... reversing the change made last December that allowed local character to be used in some instances as a reason to reduce densities; and in addition, strengthening expectations that plans should promote an uplift in density in urban areas'<sup>14</sup>. [Quod emphasis]*

2.30 The objectives of the government's policy paper are applicable to the S73 Application as a whole.

### The need for housing in London

2.31 As we discuss further in Section 3, and 4 of this statement, the government acknowledges that London has fallen well short of delivering the homes that are needed.

*More important than setting a deeply ambitious but credible target is of course meeting it. The Government is clear that recent delivery in London has fallen well short of what is needed, and that is why we are committed to working in partnership with the Mayor of London and the GLA to turn this around - including by optimising density and through Green Belt review'<sup>15</sup>.*

2.32 The Secretary of State wrote to the Mayor of London confirming the following:-

*Output in the capital will have to increase markedly from the current average of 37,200 homes per year (2019 to 2023). I appreciate fully the scale and breadth of the housing delivery challenge in London, and I recognise that the city faces unique issues, but the government does expect London to take steps to boost its output ... We both appreciate the need to urgently deliver more homes of all tenures if we are to tackle the housing crisis and boost economic growth and I know you share my commitment to doing so... This will be critical to achieving our joint goal of tackling the housing crisis'<sup>16</sup>.*

2.33 The S73 facilitates the need to urgently deliver more homes of all tenures.

### Accelerating Housing Delivery in London

2.34 The Greater London Authority issued a planning and housing practice note (PGN) in December 2024. The relevant aspects of this note for this application are set out below.

- Increasing housing delivery in London is a key priority for the Mayor, and his strategy for Good Growth in London. As part of this, the provision of affordable housing is particularly

---

<sup>14</sup> Ministerial Statement, Building in the Right Places, 30<sup>th</sup> July 2024 page 2/7

<sup>15</sup> Our plan to get Britain Building again, MHCLG 31<sup>st</sup> July 2024

<sup>16</sup> Secretary of State wrote to the Mayor of London on this issue on 30<sup>th</sup> September 2024



crucial for ensuring that housing meets the needs of Londoners. Affordable housing provision is also important in diversifying and increasing overall supply. (1.1)

- The practice note focuses on increasing the provision of affordable homes and wider housing delivery, including social rented housing for households in greatest housing need and intermediate housing for key workers and middle-income earners. (1.3)
- There are challenges currently facing housing delivery in London in the short term (1.4).
- There are a range of challenges that are affecting affordable housing delivery, including current market conditions and the sale of S106 affordable homes to Registered Providers and councils. (2.7)
- Significant build cost inflation has increased development costs. RP and council financial constraints are likely to continue to affect affordable housing delivery in the short to medium term. (2.8)
- This indicates that significant interventions will be required to maintain and increase affordable housing delivery in the coming years. (2.9)
- The Mayor wishes to promote intermediate rent housing as an additional tenure to intermediate sale products such as shared ownership to provide a range of options for households with different incomes and circumstances. (5.1)
- Providing a mix of tenures including affordable housing reduces exposure to market absorption rates and speeds up housing delivery. (8.2)
- The GLA believes that supporting intermediate rent homes helps those on middle incomes, which in turn benefits London's economy and services, and can also help wider viability issues on projects. (8.17)
- The 2023 GLA Housing Design Standards London Plan Guidance (HDS LPG) should not be applied mechanistically in a way that inhibits delivery and should be applied in the context of the need to optimise site capacity, particularly in respect of dual aspect homes (standard C4.1). (9.2)

2.35 Whilst the GLA did not consult on the PGN, reducing the weight that can be applied, those matters identified above are considered to be consistent with the Framework, known macroeconomic effects, and ministerial statements and therefore carry weight. However, the PGN also confirms that it is a material consideration in the determination of planning applications.

## The Framework

2.36 The Framework sets out the government's planning policies for England and how these should be applied. As a material consideration the Framework is given the greatest weight and should be read as a whole<sup>17</sup>.

2.37 The Framework was adopted on 12<sup>th</sup> December 2024 (updated 7<sup>th</sup> February 2025) and sets out the government's objective to significantly boost the supply of homes<sup>18</sup>. It seeks to draw together housing need and the delivery of that need to ensure that an area's identified housing

---

<sup>17</sup> Framework paragraph 3

<sup>18</sup> Framework paragraph 61

need is met<sup>19</sup>. The standard method is to be used to determine the ‘*minimum*’ number of homes needed and the Framework reinstates the requirement to demonstrate a five year housing supply<sup>20</sup>.

- 2.38 The government has deleted the exclusions introduced by the previous government which advised that housing numbers are advisory starting points; that local authorities do not need to plan density uplifts if the resulting form would be wholly out of character with an existing area<sup>21</sup>; and that local need should be met ‘*as much as possible*’<sup>22</sup>.
- 2.39 The Framework applies ‘*significant weight*’ to the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development<sup>23</sup>.
- 2.40 The presumption in favour of sustainable development (paragraph 11d)(ii) has been revised to pay particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination<sup>24</sup>.
- 2.41 Where major development involving the provision of housing is proposed, planning decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.<sup>25</sup>
- 2.42 S73 is consistent with policies of the Framework.

## Sustainable Development

- 2.43 The Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. The objective of sustainable development can be summarised as ‘*meeting the needs of the present without compromising the ability of future generations to meet their own needs*’<sup>26</sup>. Achieving sustainable development means that three overarching aims are achieved interdependently through improving the economic, social and environmental conditions of the area<sup>27</sup>. The S73 Application achieves economic, social and environmental objectives.
- 2.44 The importance of ‘*meeting needs*’ and providing sufficient housing is manifest to sustainable development, especially on brownfield land where there is an identified shortage of land to meet existing and future housing needs. The Framework recognises that the provision of new homes and commercial floorspace is an integral part of sustainable development and

---

<sup>19</sup> Framework paragraph 61

<sup>20</sup> Framework paragraph 78

<sup>21</sup> Framework (2023) paragraph 130

<sup>22</sup> Framework (2023) paragraph 60

<sup>23</sup> Framework para 85

<sup>24</sup> Framework Footnote 9 refers to the following chapter and paragraphs (5) Housing para 66 and 84; (7) town centres para 91; (9) transport para 110 and 115; (11) efficient use of land para 129 (12) design para 135 and 139.

<sup>25</sup> Framework, paragraph 66

<sup>26</sup> Framework paragraph 7

<sup>27</sup> Framework paragraph 8 and 39



establishes a presumption in favour of it at its heart<sup>28</sup>, so that it is pursued in a positive way, granting planning permission without delay.

- 2.45 Decision makers at every level are expected to approve applications for sustainable development wherever possible<sup>29</sup>. Sustainable development that delivers public benefits which significantly weigh in favour of granting planning permission should be approved. Significant development should be focused on locations which are or can be made sustainable<sup>30</sup>. In our opinion, the S73 Application represents sustainable development.

---

<sup>28</sup> Framework paragraph 10

<sup>29</sup> Framework paragraph 39

<sup>30</sup> Framework paragraph 110

## 3 Camden's Housing Needs

- 3.1 Camden's housing needs are acute, and housing delivery in the borough has been significantly beneath targets. This has given rise to adverse social, economic and environmental effects which we discuss in this section, and which the Prime Minister and Secretary of State have drawn attention to nationally.

### Summary

- 3.2 The Council's housing position can be summarised below at Table 3-1.

Table 3-1 - Camden Housing Summary

Metric	Camden
The tilted balance	Applies
5YHLS	None
HDT	Fail
AMR Indicator 1 Housing (1,038dpa)	Fail
AMR Indicator 1 Affordable (353 dpa)	Fail
3 year housing delivery record	1388 home deficit against London plan minimum
6 year housing delivery record	2085 home deficit
6 year average housing delivery record	684pa (66% of 1032pa requirement)
6 year affordable housing delivery record	1214 home deficit (43% of 353pa requirement)
2022/2023 homes completed	364
2022/2023 affordable homes completed	1
Local Plan	Out of date
Council's last published 5YHLS figure	Published 1st April 2018
Current annual housing requirement	3,137 dwellings per annum

### 5 Year Housing Land Supply ('5YHLS')

- 3.3 The Council's last published 5YHLS figure was 1<sup>st</sup> April 2018, some seven years ago. An appeal derived 5YHLS figure from 27<sup>th</sup> September 2023<sup>31</sup> was 4 years.
- 3.4 Given the lack of delivery, the time that has passed, and the application of the new standard method, we expect that the Council's housing land supply will have reduced further.

---

<sup>31</sup> Paragraph 66, APP/X5210/W/23/3324552

## Housing Delivery Test ('HDT')

3.5 For the Council, the Housing Delivery Test results 2023 (up to March 2024, reported December 2024) are 53%, with declining delivery figures of 644dpa, 532dpa and 363 dpa (2020/21-22/23).

3.6 A minimum of 975dpa were required over this period, and only 513dpa (on average) delivered.

## The Tilted Balance

3.7 Due to the Council's failure to secure a 5YHLS and fail the HDT (less than 75%), the presumption in favour of sustainable development applies (the 'tilted balance'), and planning permission should be granted.

## Current Housing needs in Camden, The Standard Method

3.8 The Government recently published the revised standard method of housing need and delivery for the Council. This results in a new minimum annual mandate of 3,137 dwellings per annum ('dpa'). This requirement applies now.

3.9 This is a 302% increase from the previous minimum (capacity) target of 1,038dpa of Table 4.1 London Plan.

## Housing Delivery in Camden

3.10 Annually, housing delivery in Camden has been poor, summarised by Table 3-2 below.

Table 3-2 - Camden Housing Delivery Deficit

Year	Camden Housing Delivery <sup>32</sup>	Minimum Target	Deficit
2024/25	Awaited		
2023/24 <sup>33</sup>	Awaited		
2022/23	363	1059	- 696
2021/22	532	1121	- 589
2020/21	644	747	- 103
2019/20	921	1025	- 104
2018/19	753	1120	- 367
2017/18	894	1120	- 226
Total	4107	6192	- 2,085
Average	684	1032	66%

<sup>32</sup> Government Housing Delivery Test Results

<sup>33</sup> The Council's latest AMR (2021/22 and 2022/23) concludes that for 2022/23 only 267 homes were granted planning permission. This would indicate a significant tail off in housing delivery.

## Camden's Annual Monitoring Targets

3.11 The Council's AMR (**Appendix 2**) Meeting Housing Needs Indicator 1 is '*To deliver 1,038 net additional homes per year to meet the housing target set for Camden in the 20 21 London Plan*'. The results demonstrate failure against this indicator.

3.12 The Council's Housing Indicator 2 is '*To deliver 353 additional affordable homes per year to meet the borough strategic target of 5,300 additional affordable homes from 2016/17 – 2030/31*'. The assessment below demonstrates failure against this indicator.

## Camden Affordable Housing Delivery

3.13 The Council's affordable housing completions are summarised in AMR Table 5, which is enclosed below.

**Table 3-3 - AMR Table 5 Affordable Housing Delivery Deficit**

**Table 5 – Affordable housing completions**

Monitoring Year	Total number of completed self-contained homes including affordable housing		Affordable housing completed (number of homes)		Financial contribution in lieu of affordable housing secured
	Gross	Net	Gross	Net	
2016/17	1,395	1,263	151 (11%)	140 (11%)	£11.7m
2017/18	1,102	945	308 (28%)	252 (27%)	£2.9m
2018/19	941	827	266 (28%)	266 (32%)	£1.04m
2019/20	1,121	985	157 (14%)	148 (15%)	£4.40m
2020/21	525*	509*	119 (23%)*	117 (23%)*	£1.62m
2021/22	464	536	120 (20%)	120 (22%)	£9.0m
2022/23	386	358	1 (0%)	1 (0%)	£2.0m

London Development Database / \* Planning London Datahub / Housing Flow Reconciliation: calculated using a new GLA / DLUHC protocol – losses are counted when development starts, not completion.

3.14 The AMR Indicator 2 seeks 353 additional affordable dpa. This can be summarised at Table 3-4 below.

Table 3-4 - Camden Affordable Housing Delivery Deficit

Year	Camden Housing Delivery <sup>34</sup>	Minimum Target	Deficit
2024/25	Awaited		
2023/24	172 <sup>35</sup>		
2022/23	1	353	- 352
2021/22	120	353	- 233
2020/21	117	353	- 236
2019/20	148	353	- 205
2018/19	266	353	- 87
2017/18	252	353	- 101
Total	904	2118	- 1,214
Average	151	353	43%

3.15 The Council has only delivered 43% of its AMR target, with a reducing number of affordable homes delivered over the past 6 years. Only 1 affordable home was delivered in 2022/23. St George is currently delivering 60 affordable homes at the Site, 50% of the total delivery in the Borough across 2021-23.

## Social, environmental and economic

3.16 We agree with the Secretary of State that adverse social, environmental and economic effects arise from historic failures to meet housing needs. They occur in this borough as set out below.

3.16.1 Camden Council spend £40M per year on housing services, including temporary housing, the 9<sup>th</sup> highest expenditure in the country of 301 authorities who returned data to MHCLG<sup>36</sup>. (**Appendix 3**)

3.16.2 We note that unlike other authorities in England, Camden has not returned data to MHCLG on statutory homelessness for the 2024 period. For the October 2023 period Camden recorded 683 households in temporary accommodation, of which 50% of these (361 households) had children. 654 children are living in temporary accommodation. (**Appendix 4**)

3.16.3 A Cabinet Report for Better Homes (14th October 2024) (**Appendix 5**) reports that as of 1 October 2024, there are 968 households in temporary accommodation, c.30% more than that reported a year before. In Camden property prices have increased by 73% in the last 15 years. A combination of high property prices and tight mortgage

<sup>34</sup> Government Housing Delivery Test Results

<sup>35</sup> MHCLG's live table indicates that there were only 172 affordable housing starts in Camden in 2023/24, 75% of the previous 5-year average of 231dpa.

<sup>36</sup> Local authority revenue expenditure and financing England: 2023 to 2024 individual local authority data - outturn

regulations have made home ownership less accessible, leading more people to rent. Since 2021, the number of homelessness approaches to the Council has more than doubled, an increase that has been seen across London. In 2022-23 only 2.3% of rental listings across London are affordable to those on the London Housing Allowance (down from 18.9% in 2020/21) and there are none in Camden.

3.16.4 The Report recognises that there are various indicators that are used to measure the standards of accommodation being provided in the borough. A key measure is whether properties, when assessed using the Housing Health and Safety Rating scheme, have any hazards that will impact on the health and safety of the occupiers. There are 29 categories of hazard ranging from damp and mould, excess cold, overcrowding and fire. As a local authority Camden have a statutory duty to ensure that any category 1 hazards found are removed, with a category 1 hazard presenting a serious and immediate risk to a person's health and safety. Despite this, within Camden, 10% of private rented properties have at least one category 1 hazard (compared to 5.9% across all tenures).

3.16.5 In Camden, 22.4% of private rented sector accommodation is non decent<sup>37</sup> (compared to London 20% and 22.9% across England). Private renters are also more likely to be living in a damp home (10%).

3.16.6 There are just under 5,000 Houses in Multiple Occupation (HMOs) that are licensed or going through the process to be licensed in Camden, out of an estimated 8,000 in the Borough. A borough-wide scheme covering smaller HMOs found that following initial inspection, 99% of properties required works to be completed to meet minimum standards.

3.16.7 Camden is the second worst London borough after Westminster for rough sleeping - in 2023/24, 903 people were seen sleeping rough which is an increase of 211 on the 2022/23 figure (719)<sup>38</sup>.

3.17 As we explain below, evidence from the Greater London Authority demonstrates that the delivery of housing can have beneficial effects, not only by providing more homes to meet needs, but economically, reducing housing costs.

### Housing and Land Housing Research Note 10 (2023)

3.18 We also draw attention to recent evidence produced by the Greater London Authority Housing and Land team - the Housing and Land Housing Research Note 10 (2023) which we enclose at **Appendix 6**. This concludes that there is a direct link between delivering new homes and reducing housing costs overall. We summarise the relevant conclusion below:-

3.18.1 There is already evidence that increases in the supply of housing bear down on housing costs over the long term.

---

<sup>37</sup> Decent Homes Standard

<sup>38</sup> Trust for London <https://trustforlondon.org.uk/data/rough-sleeping-borough/>

3.18.2 In general, building new market-rate homes makes other housing more affordable.

3.18.3 It does so by creating chains of vacancies and moves that can reach across an entire housing market area. These moving chains improve the availability and affordability of housing throughout the range of prices and rents, including for low income households.

3.18.4 Building market-rate housing therefore indirectly increases the availability of homes affordable to low-income households, although not as directly as building social housing and other kinds of affordable housing. New homes deliver improved choice and affordability for households beyond the immediate beneficiaries. The chains of moves initiated by new supply mean that one new home, even an expensive one, can improve the housing circumstances of several households.

3.19 Approval of the S73 application will help deliver further housing in the borough and reduce housing costs overall.

## Conclusions

3.20 The Council does not have a 5YHLS; and has failed the Housing Delivery Test. The new standard method of housing triples the current housing figure of the London Plan.

3.21 Less and less homes are being built in the borough, year on year, and it isn't unfair to express housing delivery in the borough as catastrophically poor, and the gap between need and supply catastrophically significant.

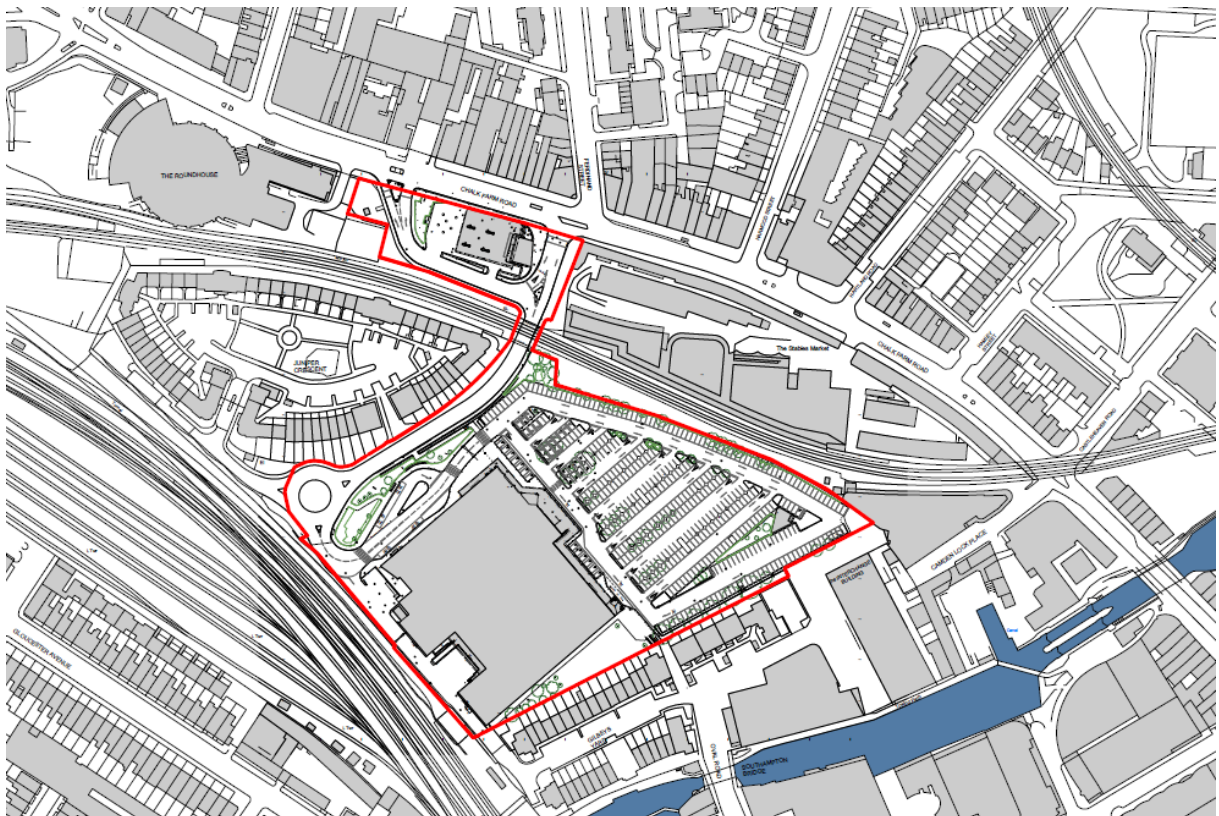
3.22 This imbalance is causing increasing housing costs for residents of all income levels and causing more and more households to be unable to afford their living costs. It is having social, economic and environmental impacts increasing homelessness, children in temporary accommodation and budget costs for the Council.



## 4 The Site

- 4.1 The application Site is the same as that which comprised the original permission. The Site formally comprised a Morrisons Supermarket (c.7,800sqm), and associated surface car park (425 spaces), a Morrisons Petrol Filling Station (PFS) and a link road, situated beneath the London Overground Line, between these two parcels of land.
- 4.2 In summary the Camden Goods Yard site was previously formed by two primary elements (as illustrated by Figure 4.1 below):
1. The Morrisons Supermarket and surface level car park ("Main Site"); and
  2. The PFS site.
- 4.3 The two primary areas combine to cover an area of approximately 3.26 hectares. The focus of the S73 Application is on the Main Site which is located in the southern and southeastern portion of the Site.

Figure 4-1 - Former Camden Goods Yard Site Location Plan



- 4.4 On the Main Site, the Morrisons supermarket has been demolished, and Buildings A and B are under construction with completion of superstructure frame and the basement has been constructed for the new Morrisons store, including a podium deck for other future residential buildings.



- 4.5 On the PFS Site, the existing PFS has now been demolished and replaced with a temporary Morrisons store (opened February 2021) consented by S73 application ref. 2020/0034/P on 5<sup>th</sup> May 2020, as proposed to be extended by planning application 024/4323/P & 2024/5651/P (to until May 2027).
- 4.6 The temporary Morrisons store (opened February 2021) will close when the new permanent store opens on the Main Site. St George expect the new Morrisons store to open next year (2026).

Figure 4-2 - Current Camden Goods Yard Site Location Plan



- 4.7 The Site is situated within Camden Town Centre, as defined in the Camden Local Plan (2017) and defined as a Major Town Centre in the London Plan (2021). The PFS Site is defined within the Camden Town Centre Secondary Shopping Frontage.
- 4.8 The PFS Site is situated within the Regents Canal Conservation Area however the Site does not contain any features of particular architectural interest. The Main Site does not fall within the conservation area. The Site does not contain any statutory listed or non-statutory locally listed buildings. A small portion of the Site to the east lies within the Canalside Industrial Archaeological Priority Area (APA).
- 4.9 Designated View 2A.2 Parliament Hill summit to the Palace of Westminster runs through the centre of the Site.
- 4.10 Both the PFS Site and Main Site are served by three vehicular access points: Chalk Farm Road signal-controlled cross junction which leads to the link road which dissects both parcels; roundabout leading from Juniper Crescent to the southwest of the Morrisons store; delivery vehicle service yard access to the temporary Morrisons Store on the PFS parcel via Chalk Farm Road.
- 4.11 The majority of the Site is highly accessible and benefits from a PTAL Rating of 5 and is located 390 metres southeast of Chalk Farm Road Underground Station and 515 metres northwest of Camden Town Underground Station. Both Underground Stations are served by the Northern Line. The nearest bus stop (Stables Market Stop CP) is located on Chalk Farm Road approximately 120 metres east of the Site.

- 4.12 The Site is located in its entirety in Flood Zone 1 meaning it has a low probability of flooding from rivers and the Sea. The nearest surface water course, Regents Canal is located approximately 130 metres to the south and southeast of the Site.
- 4.13 The entirety of the Council's administrative area is designated as an Air Quality Management Area (AQMA) due to exceedances of the EU annual average limit and hourly limit of nitrogen dioxide, and exceedance of the WHO air quality guidelines for particulate matter (PM10).

## Surrounding Context

- 4.14 The surrounding area is mixed in nature due to its town centre location, including retail, commercial, leisure, residential and railway uses.
- 4.15 The Main Site is bound to the northeast and southwest by railway lines; the railway lines to the northeast run over the vaults of the Camden Stables Market with Camden Lock Market further to the south. Directly to the north and south, the Main Site is bound by the housing developments of Juniper Crescent and Gilbeys Yard. The Horse Tunnel is to the south of the site and runs from the Stables Market through Gilbeys Yard towards the Canal.
- 4.16 The PFS parcel fronts onto Chalk Farm Road, to the north, and is surrounded by the Main Site access road and link road, both of which are part of the one-way access and egress gyratory. The latter component runs around the rear (south) and west sides of the petrol filling station.
- 4.17 The Council has granted planning permission for a number of developments in close proximity to the Site. Directly adjacent to the Petrol Filling Station Site is 100 and 100a Chalk Farm Road, a proposal granted full planning permission (ref. 2024/0479/P) in November 2024 for a mixed-use scheme comprising Purpose Built Student Accommodation (264 student bedrooms), 30 affordable homes (17 social affordable rent (57%) and 13 intermediate (43%)) and circa 852sqm of ground floor commercial space in buildings up to 12 storeys at the highest point.

## Heritage Context

- 4.18 There are number of statutorily listed buildings within the Site's surroundings, including the following:
- The Roundhouse (Grade II\*) located approximately 80m to the west of the PFS boundary;
  - Kent House (Grade II) located approximately 61m to the north of the PFS boundary;
  - Camden Incline Winding Engine House located approximately 20m to the west of the Main Site boundary.
- 4.19 There are three Conservation Areas within proximity to the Site, including Harmood Street Conservation Area to the northeast, Camden Town Conservation Area to the southeast and Primrose Hill Conservation Area to the south and southwest.

## 5 The Approved Development

---

- 5.1 Within this section of the statement, we set out the planning history of the site, and the development approved planning permission to date. St George acquired the site from Morrisons in December 2019.

### Background

- 5.2 Redevelopment of the main site was granted detailed planning permission on 15<sup>th</sup> June 2018 (application reference: 2017/3847/P) comprising the erection of seven buildings (Building A, B, C, D, E1, E2, F) of up to 14 storeys accommodating up to 573 homes (389 market and 184 affordable) and c. 28,000 sqm GEA non-residential floorspace comprising a new food store and other commercial uses, and 300 car parking spaces in a basement, together with permission on the former PFS for a new building of up to six storeys and up to c.11,000 sqm GEA floorspace to accommodate a petrol filling station (PFS), office building, and ground floor commercial. The permission also included a temporary supermarket on the former PFS site to ensure continuous trade for Morrisons. The permission was underpinned by a S106 agreement of the same date.

### Relevant Planning Permissions

- 5.3 The principal permissions relevant to the site are:-
- 2017/3847/P dated 5th June 2018 – original planning permission
  - 2020/0034/P dated 5th May 2020 (former PFS only) – PP Rev No.1
  - 2020/3116/P dated 3rd December 2020 (the main site) – PP Rev No.2
  - 2022/3646/P dated 29th March 2023 (former PFS site) – PP Rev No.3, the operative planning permission.

### The Original Permission

- 5.4 Redevelopment of the Site was granted detailed planning permission on 15<sup>th</sup> June 2018 (ref: 2017/3847/P) comprising:
- Erection of seven buildings (Building A, B, C, D, E1, E2, F) of up to 14 storeys
  - 573 homes (389 market and 184 affordable)
  - A replacement Morrisons Supermarket with 300 car parking space at basement level
  - A new six-storey building (Juniper Building) to accommodate office floorspace at upper levels and ground floor commercial uses.
  - Additional business, employment, retail and community uses, including affordable workspace, an urban farm, community facility, food and beverage.
  - Up to c.11,000 sqm GEA floorspace to accommodate a petrol filling station (PFS), office building, and ground floor commercial.

## Scheme Revisions

5.5 The principal revisions relate to the following changes:

- **2020/0034/P** dated 5th May 2020 (the “PP Rev No.1”). This inserted an additional phase (Phase 1a) into the CGY development sequence to enable the construction of a standalone temporary food store on the PFS site.
- **2020/3116/P** dated 3rd December 2020 (the “PP Rev No.2”). This secured amendments on the Main Site, namely an uplift of 71 new homes from 573 to 644 alongside a reduction in floor-to-floor height and subsequent increase in storeys of Blocks A, B, C and F. This also secured alterations to the tenure of residential units in Blocks D and E2.
- **2022/3646/P** dated 29th March 2023 (“PP Rev No.3”, the ‘Operative Permission’). This application secured the removal of the Petrol Filling Station which would be replaced with an Electric Vehicle charging station, alongside an extension of the Juniper Building 6m westward resulting in the creation of additional office floorspace across all levels (+2,207 sqm GIA).

5.6 A number of Non-Material Amendment applications (‘NMA’) applications have been granted since the 2018 Permission. Of relevance to this S73 Application, NMA ref. 2024/4241/P granted on 7<sup>th</sup> November 2024, secured amendments to the wording of the description of development description.

5.7 Most recently, a detailed temporary planning application (ref. 2024/4323/P) was submitted on the PFS Site to extend the operation of the temporary foodstore on the PFS site by 15 months for a duration of up to 75 months. This is pending determination.

5.8 The planning history of the site is included in full at **Appendix 7**.

## S106 Legal Agreement

5.9 The original S106 legal agreement is dated 15<sup>th</sup> June 2018. It has been subject to four deeds of variation (DoV), with a fifth deed of variation pending consideration by the Council in connection with the application to extend the use of the temporary supermarket.

## The Operative Permission

5.10 The most recent S73 application (ref. 2022/3646/P) on 29<sup>th</sup> March 2023, represents the Operative Permission at the Camden Goods Yard Development. This permission secured amendments to the Juniper Building (Phase 1b) on the PFS Site, namely an uplift of 2,207sqm of office floorspace.

5.11 This application was approved at LBC Planning Committee on 30<sup>th</sup> January 2023, with the fourth Deed of Variation to the Section 106 Agreement (S106) signed and dated on 29<sup>th</sup> March 2023. The Operative Permission authorises development, updated by NMA reference 2024/4241/P.

5.12 Upon grant of planning permission, we note that part of condition 73 of PP Rev 02 (replicated below) was not correctly carried across to condition 73 of PP Rev 03.



Figure 5-1: Condition 73 of PP Rev 02, 3rd December 2020

*The redevelopment of the petrol filling station site shall include the erection of a new building of up to six storeys and up to 11,243 sq m GEA floorspace.*

*The redevelopment of the main supermarket site shall include the erection of seven buildings of up to 15 storeys accommodating 644 residential units (441 market, 203 affordable) in up to 66,327 sq m GEA, 2,680 sqm of ancillary floorspace (gym, concierge, plant room, parking and energy centre), together with up to 27,983 sq m GEA non-residential floorspace, as shown in the approved plans and documents referred to in Conditions 3, 4, 5 and 6 of this permission. (our emphasis).*

Figure 5-2: Condition 73 of PP Rev 03, 29th March 2023

*The redevelopment of the petrol filling station site shall include the erection of a new building of up to six storeys and up to 13,797 sq m GEA floorspace.*

*The redevelopment of the main supermarket site shall include the erection of seven buildings of up to 15 storeys accommodating 644 residential units (441 market, 203 affordable) affordable in up to 66,327 sq m GEA of residential floorspace together with up to 27,983 sq m GEA non-residential floorspace, as shown in the approved plans and documents referred to in Conditions 3, 4, 5 and 6 of this permission.*

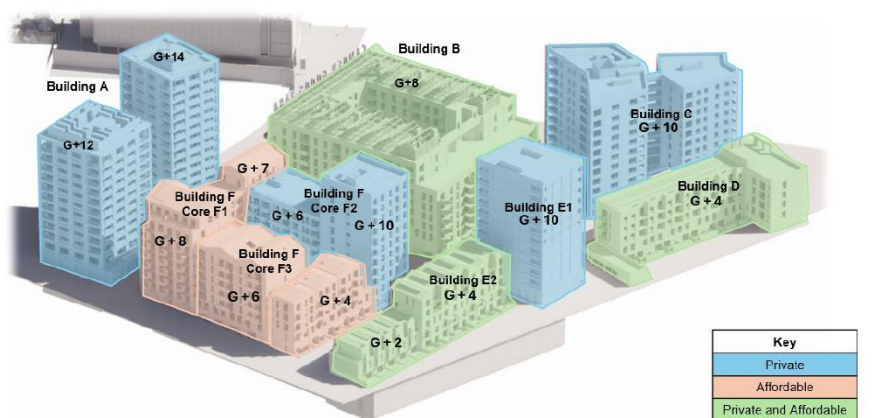
- 5.13 Because the reference to 2,680 sqm of ancillary floorspace (gym, concierge, plant room, parking and energy centre) has unintentionally been omitted from Condition 73 of PP Rev 03, 29th March 2023. The quantum of ancillary floorspace is updated as part of this application, and we now seek its reinstatement as proposed in Section 6 of this statement.

## Approved development

- 5.14 The approved building layout and referencing is enclosed at Figure 5-3 below.

Figure 5-1 - Main Site Consented Building References and Heights

Main Site Consented Building Heights:



5.15 The approved development is set out in Table 5.1 below.

Table 5-1 - Approved Development

	Studio	1 Bed	2 Bed	3 Bed	4 Bed	Total
Market	61	177	161	42	0	441
Affordable Rent	0	18	37	47	8	110
Intermediate	0	53	40	0	0	93
Total	61	248	238	89	8	644
	Floorspace					
Ancillary residential	2,680 sqm					
Non-residential	27,983 sqm					
Office development	13,797 sqm GEA					

## 6 The Proposal

---

- 6.1 The section describes the proposed development and defines the principal components of the scheme.
- 6.2 The application is accompanied by a comprehensive set of visual and illustrative material, prepared by Allies and Morrison and Piercy & Company together with a Design and Access Statement Addendum.

### Design Changes

- 6.3 The planning application seeks full planning permission for the following development:
- 637 homes
  - 83 affordable homes (15% by habitable room)
  - 23 London Affordable Rented (LAR) homes (39%)
  - 60 Intermediate rent homes (61%)
  - Reduction in building heights totalling c.10m across the site (9.929m)
  - A second stair core, firefighting shaft and other revisions will be introduced into Buildings C, E1, E2 and F1, F2 and F3 to ensure Fire Safety compliance.
  - Fire compliance to Building D (fire fighting shaft).
  - Minor changes to the distribution of mix of homes within buildings due to the second staircase insertion.
  - Minor elevational changes to reflect the minor revisions to internal layouts. These do not materially change the appearance of the buildings<sup>39</sup>
  - A total of 28,792 sq m GEA non-residential floorspace, in addition to the office /retail Juniper building of 13,797 sq m GEA floorspace.
  - A total of 2,769 sq m GEA of ancillary (residential) floorspace (gym, concierge, plant room, parking and energy centre).
- 6.4 The S73 application retains the storey heights of the seven buildings as before, ranging from 5 (GF + 4) to 11 (GF + 10) storeys, subject to the minor building height reductions.
- 6.5 The proposal also includes:-
- Significant landscaping enhancements, and the introduction of five new public spaces and streets.
  - 3,036m<sup>2</sup> of internal private residential amenity space (an increase of +181m<sup>2</sup> from the consented scheme).

---

<sup>39</sup> Please refer to the submitted Design & Access Statement.

- 10,800m<sup>2</sup> of amenity space including 6,997m<sup>2</sup> Civic Space; 3,340m<sup>2</sup> Green Amenity Space and 463m<sup>2</sup> for food growing.
- The proposed scheme also incorporates a requirement of 1,265m<sup>2</sup> playspace
- 18 resident blue badge car parking spaces (a reduction of 2 blue badge spaces due to the reduction in homes), including 4 active charging bays (+/- 0 spaces), as well as 2 car club spaces (an increase of 2 car club).
- 1,099 long-stay resident cycle spaces (+45 spaces), and 32 short-stay resident cycle spaces (+8 spaces).

6.6 The proposed housing mix and tenure is set out below.

Table 6-1 - Proposed Housing Mix

Proposed Mix	Market	Intermediate	London Affordable Rent	Total
<b>Studio</b>	57	0	0	<b>57</b>
<b>1B</b>	211	30	6	<b>247</b>
<b>2B</b>	203	30	6	<b>239</b>
<b>3B</b>	83	0	6	<b>89</b>
<b>4B</b>	0	0	5	<b>5</b>
<b>Total</b>	<b>554</b>	<b>60</b>	<b>23</b>	<b>637</b>

6.7 The proposed non-residential floorspace is presented in the below table.

Table 6-2 - Non-residential floorspace

Type	Location	Proposed (GIAm <sup>2</sup> )
Retail	Main Site	904
	<i>PFS Site</i>	<i>1,100</i>
Supermarket	Supermarket	17,709
	Retail Area	3,786
	Car Park	8,820
	Back of Operations	5,103
Office	Main Site	4,077
	<i>PFS Site</i>	<i>9,080</i>
Affordable Office	Main Site	941
Workspace	Main Site	717
Urban Farm	Main Site	1,304
Community Space	Main Site	74



Total	-	35,917
-------	---	--------

### The Planning Permission Planning Conditions - Condition 3, 4, 5 and 6

- 6.8 Condition 3, 4, 5 and 6 require variation. This requires the development to be carried out in accordance with a schedule of drawings and documents.
- 6.9 The drawings register, provided by Allies and Morrison, provide a comprehensive list of the drawings being superseded.
- 6.10 Numerous documents are also referenced within Condition 5. This S73 application is supported by Addendum Reports or a Statement of Conformity to those documents listed within the Decision Notice.
- 6.11 The principal document to be updated under Condition 5 is as follows.

Superseded Document	New Document
Affordable Housing Statement (prepared by Turley; dated June 2017)	Affordable Housing Statement (prepared by Quod; dated February 2025)

### The Planning Permission Planning Conditions - Condition 73

- 6.12 Condition 73 is to be updated to amend the number of homes, market and affordable, the quantum of non-residential floorspace and to re-insert reference to ancillary floorspace. The scheme has been remeasured and de minimis change reflect the proposed changes to the development.
- 6.13 The amendment to Condition 73, shown below in tracked changes, is set out in full below. No change is made to the PFS Site description, only to the Main Site description.

#### *Condition 73 Number and mix of residential units*

*The redevelopment of the petrol filling station site shall include the erection of a new building of up to six storeys and up to 13,797 sq m GEA floorspace.*

*The redevelopment of the main supermarket site shall include the erection of seven buildings of up to 15 storeys accommodating **644 637** residential units (~~441 market, 203 affordable~~**554 market, 83 affordable**) in up to 66,327 sq m GEA of residential floorspace, ~~2,680~~**2,769** sqm GEA of ancillary floorspace (gym, concierge, plant room, parking and energy centre), together with up to ~~27,983~~**28,792** sq m GEA non-residential floorspace, as shown in the approved plans and documents referred to in Conditions 3, 4, 5 and 6 of this permission.*

- 6.14 For completeness, the amended condition without tracked changes is shown below:

#### *Condition 73 Number and mix of residential units*

*The redevelopment of the petrol filling station site shall include the erection of a new building of up to six storeys and up to 13,797 sq m GEA floorspace.*

*The redevelopment of the main supermarket site shall include the erection of seven buildings of up to 15 storeys accommodating 637 residential units (554 market, 83 affordable) in up to 66,327 sq m GEA of residential floorspace, 2,769 sqm GEA of ancillary floorspace (gym, concierge, plant room, parking and energy centre), together with up to 28,792 sq m GEA non-residential floorspace, as shown in the approved plans and documents referred to in Conditions 3, 4, 5 and 6 of this permission*

## Comparison of operative permission and proposed development

6.15 The key changes proposed by the S73 Application are summarised below, the consequence of which are considered further within this Planning Statement.

Table 6-3 - The Approved and Proposed Development

	Approved	Proposed
<b>Housing</b>		
Total homes	644	637
Affordable housing % by habitable room	38.1%	15%
Affordable housing tenure mix (by habitable room) London affordable rent: intermediate rent	66:34	39:61
Affordable housing tenure (by homes)	54:46	28:72
Total affordable homes	203	83
Total LAR homes	110	23
Total intermediate rent homes	93	60 <sup>40</sup>
Buildings C, E1, E2 and F1, F2 and F3		Fire Safety compliance
Building D		Minor changes arising from tenure revisions and Fire Safety Compliance
Overall housing mix	Studio x 61 (9%) 1b x 248 (39%) 2b x 238 (37%) 3b x 89 (14%) 4b x 8 (1%)	Studio x 57 (9%) 1b x 247 (39%) 2b x 239 (37%) 3b x 89 (14%) 4b x 5 (1%)

<sup>40</sup> These homes are currently being delivered in Building B.

	Approved	Proposed
<b>Housing</b>		
Ancillary residential	2,680 sqm	2,769 sqm
<b>Other</b>		
Non-residential	27,983 sqm	28,792sqm Increase of 809sqm following re-measurement of the scheme and marginal building footprint increase to building E1
Office development	13,797 sqm GEA	13,797 sqm GEA

### Building Heights

6.16 The floor-to-floor heights within all buildings have been reviewed. Whilst floor to ceiling heights have remained the same, the void above ceiling heights have been rationalised to improve efficiencies.

6.17 The overall building heights have been reduced as set out within the Table below.

Table 6-4 - Approved and Proposed Building Heights

Building	Approved	Proposed	Difference
Building C	G + 10 storeys AOD: 73,950mm	G + 10 storeys AOD: 73,350mm	-600mm
Building D	G + 4 storeys AOD: 54,300mm	G + 4 storeys AOD: 53,900mm *	-400mm
Building E1	G + 10 storeys AOD: 73,375mm	G + 10 storeys AOD: 70,400mm	-2,975mm
Building E2	G + 4 storeys AOD: 52,950mm	G + 4 storeys AOD: 52,200mm	-750mm
	G + 2 storeys AOD: 45,450mm	G + 2 storeys AOD: 45,080mm	-370mm
Building F1	G + 8 storeys AOD: 68,213mm	G + 8 storeys AOD: 67,914mm	-299mm
Building F2	G + 10 storeys AOD: 73,875mm	G + 10 storeys AOD: 72,075mm	-1,800mm
	G + 6 storeys AOD: 60,606mm	G + 6 storeys AOD: 58,785mm	-1,821mm
Building F3	G + 6 storeys AOD: 64,410mm	G + 6 storeys AOD: 64,035mm	-375mm
	G + 4 storeys AOD: 54,050mm	G + 4 storeys AOD: 53,511mm	-539mm

*\*[Block D Lift overrun AOD: 55,700mm = +1,400mm]*

## Playspace

- 6.18 The proposed development provides dedicated play space in line with London Plan policy S4, and this will be achieved on site.
- 6.19 As a consequence of the proposed housing mix there is a requirement for 1,145m<sup>2</sup> of play space in total. The development will provide 1,265m<sup>2</sup> which is 120m<sup>2</sup> above the requirement. The requirement for each age group has been met on site and further details of the design are included in the Design and Access Statement.

Table 6-5 - Approved and Proposed Playspace

Age-group	Approved	Proposed Requirement	Total (to be Delivered)
Ages 0-4	512	523	523
Ages 5-11	413	385	402
Ages 12+	340	237	340
Total	1,265	1,145	1,265

## 7 The S73 Application Documents

- 7.1 The S73 Application is accompanied by supporting forms, technical documentation and an EIL Statement of Conformity to the Environmental Statement.
- 7.2 The extent of analysis within each document proportionally reflects the assessment necessary to consider the proposed changes. These documents should be read in conjunction with those submitted for the S73 Planning Application.
- 7.3 The following documents are submitted in support of the S73 Application.

Table 7-1 - Application Documents

Document	Author
<b>Application Forms</b>	
Planning Application Covering Letter	Quod
Planning Application Form	Quod
Planning Application Fee	St George
CIL Form & Covering Letter	Quod
<b>Design Principles</b>	
Design & Access Statement Addendum (incl. Landscaping and Accessibility)	Allies & Morrison (A&M), Piercy & Company (P&Co) Murdoch Wickham David Bonnett Associates (DBA)
Accommodation Schedule	A&M (w/ P&Co)
Design & Landscaping Drawings	A&M, P&Co, Murdoch Wickham
Schedule of Changes (within Design & Access Statement)	A&M, P&Co
<b>Technical Assessments</b>	
Planning Statement	Quod
Housing and Viability Statement	Quod
Air Quality Assessment Addendum	Ardent
Air Quality Positive Statement	Ardent
BREEAM Pre-Assessment	Waterman
Circular Economy Statement	Waterman
Economic and Regeneration Impact Statement Addendum	Turley Economics
Energy Statement	Waterman
Environmental Implication Letter (EIL), incl.: <ul style="list-style-type: none"> <li>- Air Quality</li> <li>- Noise &amp; Vibration</li> <li>- Townscape</li> <li>- Heritage</li> <li>- Wind</li> <li>- Daylight, Sunlight &amp; Solar Glare</li> <li>- Transport</li> <li>- Socio Economics</li> </ul>	Ramboll, w/ relevant consultant input

Document	Author
Fire (Gateway 1 Form for GLA Policy D12) and Fire Strategy (including non-technical explanations of fire safety).	Introba
Health Impact Assessment (HIA) Addendum	Turley Economics
Heritage Statement Addendum	Turley Heritage
Internal Daylight, Sunlight & Overshadowing Report	GIA
Noise and Vibration Addendum	Ardent
Overheating Assessment	Waterman
Sustainability Statement	Waterman
Townscape and Visual Impact Assessment (TVIA) - Addendum	Tavernor
Transport Technical Note	Ardent
Whole Lifecycle Carbon Assessment	Waterman
Wind Microclimate Technical Note	GIA

# 8 The Development Plan

- 8.1 This section provides commentary on the nature of the development in the context of strategic development, national regional and local planning policy.
- 8.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals shall be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.3 The development plan comprises the Camden Local Plan (2017), Policies Map (2016) and Site Allocations (2013); and the London Plan (2021).

## Camden Local Plan

- 8.4 The Camden Local Plan (2017) is out of date for the purposes of decision making because the Council cannot demonstrate a 5YHLS and fails the HDT<sup>41</sup>.
- 8.5 This means that the following Camden Local Plan (2017) policies are out of date:-
- Policy H4 - the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing;
  - Policy H4 - an affordable housing target of 50%, subject to viability;
  - Policy H7 – large and small home mix (see Local Plan table 1 below)

**Table 1: Dwelling Size Priorities**

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

## Local Plan Review

- 8.6 The Council commenced a local plan review in 2023 with a call for sites and options assessment and St George engaged in this process seeking greater flexibility of policy application and optimisation of existing allocated brownfield sites.
- 8.7 The Council published a new Draft Regulation 18 Camden Local Plan (incorporating Site Allocations) for consultation (DCLP). The consultation closed on 13 March 2024. The DCLP is a material consideration in the determination of planning applications but has limited weight at

<sup>41</sup> Framework paragraph 11(d)

this stage. The DCLP Draft Site Allocation – C7 (CGY2 and 3) identifies the site as two draft site allocations (see previous instructions appendix 2).

- 8.8 CGY2 (Main site) is allocated for permanent self-contained homes, employment (offices and maker spaces), retail, food and drink, community and leisure use; 644 additional homes.
- 8.9 CGY 3 (Former PFS) is allocated for employment (offices), permanent self-contained homes, retail, food and drink.
- 8.10 St George made representations to this emerging policy. The representations covered various aspects of the plan including emphasising that development make the best use of land by following a design-led approach that optimises the capacity of sites through high density development.
- 8.11 Due to paragraph 16, 36, and 49 of the Framework limited weight can be applied to the Council's emerging plan, and in particular the following policies, which generally mimic the current plan:-
- H4 – the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing;
  - H4 – an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings subject to viability;
  - H7 – large and small homes (see Local Plan table 5 below), slightly different from the adopted local plan.

**Table 5: Dwelling Size Priorities Table**

	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	lower	high	high	lower

- 8.12 The DCLP is a material consideration in the determination of planning applications. In accordance with paragraph 16, 36 and 49 of the Framework, it carries limited weight because of the early stage of preparation; the extent of unresolved objections; and the degree of inconsistency with the Framework.

## London Plan

### 2019 Review

- 8.13 The Review of the current adopted London Plan is material because it forms the context to the planning for an undersupply of housing to meet London's needs, and the requirement to undertake a review as early as possible.
- 8.14 The Examiners Report into the London Plan is relevant to the determination of the S73 Application, and the weight that can be applied to it. The Panel concluded the following:-



- The presumption in favour of small housing development is cumbersome, its impact is diluted and the task for the decision-maker overly complicated. There is no evidence that a blanket presumption in favour of infill development within the curtilage of a house is justified even if limited in area. The modelling of small sites is insufficiently accurate to give a true picture of the likely available capacity. As such, it does not provide a reliable input to the overall targets (168/170)
- The upshot of the direction was that the overall housing target was amended from 65,000dpa to 52,000dpa. (174).
- The London Plan was nearly found unsound, *'Given the failure to meet, by some margin, the identified annual need for housing of 66,000 units we did consider during the examination in public whether this Plan should be paused for further work to be done. Alternatively, we considered whether we should determine that it does not meet the tests of soundness and so should be withdrawn'*. (175)
- *'Of course, it is a major concern that the targets are so far below the assessed need. However, the evidence simply does not justify the reliance placed by the Mayor on small sites to fill the gap between the two and we are sceptical about the delivery from this source. This Plan does not provide the key to unlocking any potential'*. (177)
- *'It is therefore right to say that boroughs should use all the tools at their disposal to ensure homes are actually built'*. (178)

8.15 We consider that there are inherent issues arising from the decision to progress with adoption, including the lack of effectiveness and positive planning within the document which has led to the decline in housing delivery in London.

#### Housing Need/Capacity

8.16 The London Plan was informed by the 2017 SHLAA. The SHLAA identified housing need of 66,000dpa, yet the London Plan was adopted with a capacity target only 78% of this 52,000dpa.

8.17 The new standard method for London is a minimum requirement of 87,992dpa, a material consideration for the determination of this planning application, requiring 35,533 net additional dpa above Table 4.1 of the London Plan.

8.18 Housing delivery generally in London is c.34,000dpa and dropping.

8.19 Affordable housing starts in London for 2023/24 are just 3,156 homes, just 17% of the previous 5-year annual average (19,122 dwellings)<sup>42</sup>.

#### Future Review

8.20 The Framework recognises the role of a spatial development strategy (SDS), which includes the London Plan, and expects a review to keep it up to date :-

- Policies in local plans and SDS should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.

---

<sup>42</sup> MCLG live table

Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. (34) (our emphasis)

- Footnote 19: Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012)

8.21 The London Plan is therefore out of date in this regard.

#### Government request for review

8.22 The government first raised the issue<sup>43</sup> of the disparity between the Mayor's assessment of housing capacity in London (42,000dpa) and the full extent of housing need (65,000dpa) in 2018.

8.23 The Secretary of State advised the Mayor that *'It remains crucial however that you bring forward a revised London Plan that has regard to new national policies at the earliest opportunity. You will want to note paragraph 33 and annex 1 of the revised National Planning Policy Framework, which sets out that the Government expects plans to be reviewed early where all identified housing need is not being met and to ensure a plan is in place which reflects current national policy. I would therefore expect you to review the London Plan to reflect the revised National Planning Policy Framework immediately once the London Plan has been published'*.

8.24 The Examiners report on the London Plan at paragraph 595 expected a revised London Plan to be in place by 2024/25.

8.25 The Secretary of State followed up with a further letter on 12<sup>th</sup> February 2024, and 18th March 2024 directing a review of Industrial land and Opportunity Areas requesting by June 2024; an assessment of the effect of the policies on housing delivery; and an indication of potential updates and amendments to increase and accelerate housing delivery.

8.26 In July 2024, MCLG<sup>44</sup> addressed the issue publicly stating that *'The Government is clear that we must radically boost delivery in our capital to meet housing pressures and fuel productivity growth'* and on 30th September 2024, the Secretary of State withdrew the previous administration's direction of 18 March 2024 requiring the Mayor to complete a partial review of the London Plan by 30 September 2024<sup>45</sup>. She also emphasised the need to deliver the new *'ambitious but deliverable'* standard method target because output in the capital will have to increase markedly from the current average of 37,200 homes per year (2019 to 2023).

---

<sup>43</sup> 27<sup>th</sup> July 2018, The Rt James Brokenshire MP

<sup>44</sup> 31<sup>st</sup> July 2024, MCLG Blog Our plan to get Britain Building again

<sup>45</sup> Given under section 340(2) of the Greater London Authority Act 1999

- 8.27 The Mayor is now expected to start the London Plan review process in March 2025 and the new plan will not be adopted until 2027, out with the requirements of the Framework.
- 8.28 The London Plan is out of date by virtue of its failure to be reviewed, inconsistent with paragraph 34 of the Framework. The policies carry reduced weight because of this, their age, and because of the significant changes to housing need since the SHLAA 2017 was issued and the plan adopted in 2021. The Accelerated Housing GLA Practice Note (December 2024) also seeks to update affordable housing policies.
- 8.29 We consider the application of development plan policies in the following section of this statement.

## 9 Planning Considerations

---

9.1 This section considers the planning issues arising from the S73 Application.

### Principle of development

9.2 The principal components of the development have already been determined by the Council on 4 separate occasions and found to be acceptable.

9.3 The same principles established in the determination of the original permission, up to the Operative Permission, remain sound and apply to the S73 Application. We do not therefore consider there to be any requirement for detailed analysis in respect of the masterplan, land uses, layout, design, massing, transport or environmental planning considerations.

### Building Heights

9.4 The building heights have been reduced throughout the development, and there are therefore no impacts arising.

### Housing delivery

9.5 The S73 Application will unlock completion of the planning permission as a whole and deliver 637 much needed homes, a significant contribution to the Borough's new housing targets in a sustainable town centre location.

### Housing mix

9.6 The housing mix is not proposed to change. We therefore conclude the following:-

9.6.1 London Plan H10 (Housing size mix) suggests that proposals should generally consist of a range of unit sizes, taking into account needs, tenures, nature of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.

9.6.2 Adopted Camden Policy H7 is out of date, and emerging Camden Policy H7 (Table 5) carries limited weight.

9.6.3 For market homes, the emerging plan dwelling size priorities indicates a high need for 2 and 3 bed market homes. As per the extant permission the S73 Application proposes 52% of homes of this size.

9.6.4 For intermediate homes, the emerging plan dwelling size priorities indicates a high need for 1 and medium need for 2 bed homes. The S73 Application proposes 100% of homes of this size.

- 9.6.5 For LAR homes, the emerging plan dwelling size priorities indicate a medium need for 2 and 4 bed homes, and a high need for 3 bed homes. The S73 Application proposes 74% of homes of this size (2, 3 and 4 bed).
- 9.6.6 The overall housing mix contains a good split of 3 bed and 4 bed homes, totalling 15% overall as per the extant permission.
- 9.6.7 Overall, the S73 Application retains the approved mix which was previously considered a benefit of the scheme.

**Table 9-1 - Proposed Housing Mix (Tenure Split)**

Home Type	Market		Intermediate Rent		London Affordable Rent	
	Number of Units	Unit % of Mix	Number of Units	Unit % of Mix	Number of Units	Unit % of Mix
Studio	57	10%	0	0%	0	0%
1-Bed	211	38%	30	50%	6	26%
2-Bed	203	37%	30	50%	6	26%
3-Bed	83	15%	0	0%	6	26%
4-bed	0	0%	0	0%	5	22%
<b>Total</b>	<b>554</b>	<b>100%</b>	<b>60</b>	<b>100%</b>	<b>23</b>	<b>100%</b>

- 9.7 We consider that the proposed S73 Application housing mix is acceptable.

### **Affordable housing provision**

- 9.8 60 affordable homes are being delivered on site within Building B as intermediate rent, and are subject to fixed layouts for 1 and 2 bedroom homes. The remainder of the affordable homes (23) will be delivered as London Affordable Rent in Building E2.
- 9.9 We note from Camden's published information on its website that on average 54% of key worker households need intermediate rent, compared to 7% who need social rent housing, and that demand for intermediate housing is high, but supply is low.
- 9.10 In accordance with paragraph 59 of the Framework, and London Plan Policy H5J, the S73 application is accompanied by a viability assessment ('FVA') to support the affordable housing proposal. This provides justification for the reduction of the number of affordable homes from 203 affordable housing units to 83 affordable housing units. The proposed tenures (LAR and Intermediate Rent) remain unchanged but the tenure mix has changed from 66:34 (rent:intermediate) to 39:61 by habitable room.
- 9.11 Given the overwhelming need for affordable housing in Camden and London generally, the provision of 83 affordable homes carries significant weight in support of the S73 Application.

- 9.12 The practical implications of the commencement of Building B informs the mix and tenure split across the whole site, the FVA supports the provision of these homes and the additional LAR homes.
- 9.13 The extant S106 agreement as varied includes affordable housing triggers linking occupation of private homes to delivery of affordable homes. In respect of Buildings A and B, the S106 prevents occupation of more than 110 private homes until a contract for 21% of the affordable housing units (43 affordable units) has been entered into with a RP and those affordable units have been constructed and fitted out.
- 9.14 There are 60 intermediate rented homes in Building B which St George has been marketing and has received an offer from a Registered Provider. St George are progressing negotiations with the preferred party to enter into a contract to satisfy these S106 affordable housing triggers. The affordable housing provision in Building B is not affected by this application.
- 9.15 The 23 no. LAR homes proposed are to be delivered in Building E2 a stand-alone building which can deliver a more favourable mix of homes including 3+ beds.
- 9.16 London Plan Policy H6 (Affordable housing tenure) recognises that viability constraints will inform tenure mix. Camden's out of date local plan tenure mix of 60% social-affordable rented housing and 40% intermediate housing is borough wide, and a 'guideline' informed by viability and site characteristics. The Framework supports a mix of affordable housing required to meet identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.
- 9.17 We consider that the proposed S73 Application affordable housing tenure which remains unchanged at LAR and Intermediate Rent is acceptable.

### Other affordable matters

- 9.18 The provision of 83 affordable homes should be seen in the context of the weight recently applied to the provision of 30 affordable homes at 100 and 100a Chalk Farm Road London, NW1 8EH (2024/0479/P & 2024/0539/L). The Council accepted that these would make a *'significant contribution to the area's housing provision'*.

[44 Cleveland Street, London W1T 4JT - APP/X5210/W/22/3300894 -](#)

- 9.19 Quod draws the Council's attention to decision reference APP/X5210/W/22/3300894, dated 1st December 2022, and the Inspector's conclusions in granting the appeal.
- Development at the site had commenced under the terms of the revised 2019 planning permission. (4)
  - With the lack of a five-year housing land supply accepted by both parties and given footnote 8 paragraph 11 d) ii) of the Framework is engaged. (8)
  - The local housing policy context is discussed generally at paragraph 13 (whilst the Inspector doesn't reduce the weight of the policies, he, later, doesn't apply full weight to the conflict with the housing mix policy, only moderate weight).

- Although viability assessments from each of the parties concluded that the appeal scheme would be unable to fund any affordable housing, the appellant nevertheless offered to provide 17 affordable housing units on the basis that it was willing to accept a lower return in order to meet its charitable objectives. Should viability alter in the developer's favour, a viability review clause within the planning obligation would secure an appropriate uplift in contribution. (21)
- The Inspector acknowledged that London Plan Policy H10 (housing mix) incorporates provision for a flexible approach, particularly on sites that are close to town centres where there is higher public transport access and connectivity, which is the case here. Although the Council inferred that a flexible approach is normally confined to residential conversions, this is not borne out in the wording of the policy nor in the text accompanying the policy. (23)
- Taking all the above factors into account, the Inspector was satisfied that, having regard to the largely agreed position following financial viability negotiations, the level of affordable housing would be in line with CLP Policy H4. (25)
- The public benefits of the appeal scheme would be very substantial and, as explained later in the planning balance to this decision, include much needed market and affordable housing; it would support the FAAP Masterplan, including the reinstatement of Bedford Passage and would promote high quality urban regeneration; it would lead to the provision of flexible commercial space; it would provide economic benefits through job creation and spending by future local residents; and would also lead to social benefits through the provision of medical facilities. (36)
- *'The reduction in affordable housing from the previous scheme justified by viability exercises undertaken does not diminish the substantial public benefits despite the Council's claim to the contrary'.* (39)
- *'The policies which are most important for determining the application the subject of this appeal are therefore out-of-date having regard to footnote 7 to paragraph 11d) of the Framework'.* (48)
- Turning to the scheme's benefits, the uplift in housing provision on a previously neglected brownfield site that has laid empty for fifteen years and at a point in time when the Council is failing on its housing targets despite housing being identified as one of its highest priorities, carries with it significant weight in the balance. The same is true of the affordable housing which appears to be committed despite acknowledged viability concerns. Further, the development will bring about economic benefits both in the short term as development proceeds and longer term when residents will contribute towards this growing vibrant community through spending. It will also lead to the re-opening and enhancement of Bedford's Passage following a period of a 100 years where the local community have been denied a useful pedestrian link. The Inspector attached significant weight to these social and economic benefits. (50)

9.20 We consider that the principles set out in the enclosed decision apply to the principles of the determination of the S73 Application.

## Delivery

9.21 Approval of the S73 would ensure that the Development can continue to be built out, meeting the Government's clear direction to accelerate housing delivery, whilst providing St George



with viability certainty and the Council with additional affordable housing contributions through a late stage review mechanism in the event that viability improves. In the absence of approval to the Section 73 Application, the Development is likely to be paused until market conditions improve, but St George has demonstrated its commitment to delivering the development in the long term due to:

- Its extensive experience, expertise and pedigree delivering complex urban sites for mixed use housing and regeneration;
- Commencing development on site, and investing significant up-front costs;
- Engaging in extensive pre-application consultation across several years;
- Engaging with the Council extensively post submission of the original application and amending the application following officer advice; and
- Working with officers to try and find a suitable solution to secure delivery of the development.
- Extensive engagement with the market to secure an RP for the 60 Intermediate Homes in Building B.

## Apartment Sizes

9.22 All homes continue to meet the Mayor's minimum units sizes (Camden Local Plan Policy 9 states that residential development will be assessed to ensure that it meets the internal space standards set out in the London Plan).

## Dual Aspect

9.23 The majority of homes are dual aspect units which creates exemplar residential amenity, with 74% of homes.

9.24 There are no north facing single aspect homes, and no single aspect 3+ bed homes.

## Heritage

9.25 For the determination of the original application, the following analysis was undertaken.

- GLA officers are satisfied that while the setting of Primrose Hill Conservation Area; and the special historic interest of Regent's Park, will be altered, the significant benefits of the scheme such as: increased permeability; the delivery of a significant quantum of housing; and the creation of high-quality public realm, would outweigh any harm caused. (2.26)
- HE considered that the proposals have the potential to improve the settings of various designated heritage assets of this part of Camden but could also cause some harm. (2.48). The harm identified is modest and could be outweighed by public benefits in accordance with the NPPF. (6.11)
- Officers consider that any heritage harm caused by the development would be within the category of 'less than substantial' (6.115).

- Para 19.46 of the committee report lists substantial and extensive benefits of the proposal.
- Para 19.53 concludes *'The benefits arising from the development compared to the existing site is long and substantial. It includes notable elements such as the affordable housing offer, but includes many smaller but important contributions to other concerns. This is to be expected from such a scale of development which needs to provide many benefits in order to minimise the impact of the many new residents, workers and visitors that new neighbourhood will bring to the site. These measures are underpinned by policy requirements'*.

9.26 Officers expressly recognise that benefits are not solely weighted to affordable housing, and that many benefits cumulatively arise. We consider that conclusion remains sounds, and when set in the context of the housing need that we have identified is compelling.

## Microclimate

9.27 Following the scheme optimisation, a series of updated assessments have been conducted, covering the following areas.

### Daylight, Sunlight and Overshadowing

9.28 The daylight consultant undertook a reassessment of the daylight, sunlight, and overshadowing impacts for all buildings on the Main Site.

9.29 For daylight, overall 844 (85.5%) out of all 987 proposed habitable rooms would achieve the recommended levels for Median Daylight Illuminance (MDI). In addition, a further 66 (6.7%) rooms would only fall slightly short of recommendation, and so a total of 910 (92.2%) rooms are considered to offer good daylight levels in the context of this urban regeneration.

9.30 For sunlight, 259 (72.1%) out of all 359 homes would have at least a south-facing window, 273 (76.0%) would achieve at least 1.5 hours of sunlight at the equinox, and a total of 240 (66.9%) would meet both criteria. A further 21 (5.8%) homes would achieve at least 1 hour of sunlight at the equinox. As such, a total of 294 (81.9%) homes are considered to receive good sunlight exposure for an urban location.

9.31 The results above are in line with the extant consent, where compliance for daylight was 87%, and that for sunlight 71.9%. It should be noted that the percentages of compliance are not directly comparable due to the change of methodology in BRE guidelines 2022 edition, which introduced climate based methods of assessment. Nonetheless, the results show comparable levels of amenity, as it would be expected for a design similar to the consented scheme.

9.32 For overshadowing, 63% of all proposed ground floor open spaces would meet BRE guidelines, just marginally better than the consented scheme (by 1%) given the slight reduction in height of the Proposed Development. All rooftop terraces would be provided with excellent levels of sunlight similar to the consented scheme, and the courtyard of building F would retain slightly improved sunlight levels.

9.33 As to the effects of the Proposed Development upon buildings A and B, these have been found to be negligible, mostly slightly beneficial, but not material to alter their levels of natural light amenity significantly.

- 9.34 Overall, the Proposed Development would continue to provide good levels of daylight and sunlight, in line with the extant consent.

#### Wind

- 9.35 As evidenced within the Environmental Information Letter (EIL), prepared by Ramboll, and the Wind Microclimate Note, prepared by GIA, the proposed development has a negligible impact on the wind conditions.
- 9.36 The amendments which would have the greatest potential for changing wind is the reduction of building height of Blocks C, D, E1, E2 and F. The change in height would reduce the potential of the buildings to create downwash and as such would result in either negligible or calmer wind conditions at ground level around these buildings.
- 9.37 With regards to marginal increase to the footprint of Block E1, this would typically have a marginal increase in wind conditions due to the proximity to surrounding buildings, however it is highly unlikely to overcome the reduced wind conditions created by reducing the height of this block.
- 9.38 In conclusion, the proposed amendments to the Main Site design would have a negligible or beneficial impact on the wind conditions on or around the site, and the results and conclusions of the wind microclimate assessment submitted with 2020/3116/P would remain valid

#### Conclusions

- 9.39 In summary, the assessments confirm that the proposed massing revisions will maintain or improve the environmental conditions, with no adverse effects on daylight, sunlight, overshadowing, or wind conditions. The optimisation introduces minimal changes, ensuring the scheme continues to align with the originally approved parameters while enhancing certain aspects of the development.

# 10 Public Benefits and the Planning Balance

---

- 10.1 Granting this S73 Application will unlock completion and continued delivery of the wider Camden Goods Yard development, which continues to be an exciting opportunity to optimise and transform an underutilised brownfield site into a new integrated and sustainable neighbourhood which contributes to the area's rich cultural identity and character and wider Camden Town Centre.
- 10.2 This S73 Application will ensure St George's ongoing commitment to investing in the Site and wider Camden Town Centre and enable the delivery of a number of public benefits associated with the wider CGY development.
- 10.3 The suite of public benefits associated with the proposed development at CGY are summarised below and should be taken into consideration when assessing this S73 Application.
- 10.4 In previous sections we explained why, in our opinion, the S73 Application accords with relevant development plan policies which carry weight, and the development plan when read as a whole. As such, it benefits from the statutory presumption as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004, taken with Section 70(2) of the Town and Country Planning Act 1990.
- 10.5 Even if any conflict with the development plan was found, the nature and extent of that conflict would need to be weighed in the planning balance against other considerations including particularly the compliance with the development plan, public benefits of the proposals and other material considerations.
- 10.6 We also consider that the S73 Application accords with the Framework and is sustainable development within the meaning of the Framework. It is also supported by recent ministerial statements by the Prime Minister and Secretary of State.
- 10.7 As we explain, in our opinion the development plan, public benefits and material considerations weigh strongly in favour of granting planning permission.

## The titled balance and presumption in favour of sustainable development

- 10.8 Paragraph 11 (d) of the Framework is enacted. There is a presumption in favour of sustainable development and the S73 Application should be approved and planning permission granted, without delay. The full weight of the presumption applies.
- 10.9 We consider that the application of heritage policies<sup>46</sup> do not provide a '*strong*' reason for refusal because building heights have been reduced, and were previously found acceptable, and where less than substantial harm was identified, very many public benefits were identified.

---

<sup>46</sup> Framework paragraph 11(d)(i)

10.10 We consider that any reasonable assessment of the adverse impacts (which have not been identified in any event) of granting permission would not significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework when read as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes.

### Paragraph 125 (c) of the Framework

10.11 Paragraph 125 (c) of the Framework applies. This proposal should be approved because substantial harm would not be caused, neither has any been identified.

### Public benefits

10.12 Public benefits can be anything that deliver economic, social or environmental objectives as described in paragraph 8 of the Framework.

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

10.13 Public benefits should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

10.14 Public benefits are a material consideration under section 38(6) of the Planning and Compulsory Purchase Act 2004, and case law and NPPG ties them into Framework paragraph 8.

10.15 The Framework applies weight to benefits. They are a constituent part of the presumption (paragraph 11) and greater weight is applied the more that issues can be resolved at pre-application stage (paragraph 42). It is recognised that mixed tenure sites and mixed use schemes can provide a range of benefits (paragraph 71 & 125) as can access to high quality open spaces (paragraph 103). Public benefits can outweigh less than substantial harm to the significance of a designated heritage asset (paragraph 215).

- 10.16 In some circumstances, the Framework guides the weight that can be applied to public benefits such as economic growth and productivity; using suitable brownfield land for housing; and compliance with local design policies. In these cases, it is ‘*substantial*’, but ultimately a professional judgment is required given the circumstances of the case.
- 10.17 For this S73 Application, we consider that substantial weight cascades through all public benefits and material considerations both individually and cumulatively related to using the Site for new homes and commercial floorspace due to the objectives of the development plan, the housing need that we have identified, and the importance that the Government attaches to meeting needs as set out in the Framework, and the very many and recent ministerial statements.
- 10.18 Because of the Site characteristics, and the contextual challenges that the borough faces, including the scarcity of brownfield land, each matter below benefits from the elevated level of substantial weight. These public benefits were recognised and reported to the planning committee in support of the original grant of planning permission. These public benefits all remain unchanged from the previous grant of planning permission and relevant to this planning application.

#### Redevelopment of Brownfield Land

- 10.19 The proposed development offers the comprehensive redevelopment of an underutilised brownfield site to deliver a residential-led, mixed-use urban neighbourhood at an appropriate density and balance of uses in a sustainable town centre location.

#### New Homes

- 10.20 The proposed development will deliver 637 desperately needed high-quality homes for the local community, making a significant contribution towards meeting housing targets in Camden and the wider London area.
- 10.21 The residential accommodation will provide a range of typologies, including courtyard blocks, mews, townhouses and duplexes, as well as a range of unit sizes from studio apartments to four-bedroom family dwellings. These will be supported by communal residential amenity facilities, including a gym, concierge, lounge and library.
- 10.22 The proposals align with the housing policy goal of surpassing the target for new homes by prioritising self-contained housing as outlined in the Local Plan. This is achieved through the delivery of a substantial number of new homes in Camden.
- 10.23 The new housing will significantly contribute to the Council’s objectives for new homes, which is a positive outcome. The range of unit sizes provided supports the policy’s focus on fostering mixed, inclusive, and sustainable communities by offering housing options that cater to the diverse needs of different households and individuals.

#### Masterplan Design & Character

- 10.24 It is considered that each of the proposed building designs successfully respond to the Site’s context. While each block has its own architectural character, reflecting its position and function on the site, a shared identity has been achieved through the use of brick in various tones and

finishes, masonry, pre-cast concrete, metalwork, and deep-set window reveals. The architects have been careful to avoid creating an aesthetic that feels like “pastiche,” blending forms, materials, and details from the site’s context in a contemporary manner.

- 10.25 Whilst the character of the proposed development is significantly denser and taller than much of its surrounding context, it offers a confident and robust identity that celebrates the rich culture and heritage context of the Site and surrounding area and yet is successful in distinguishing itself as a new urban neighbourhood and place.
- 10.26 The masterplan is also successful in breaking down the Site’s isolated feel by improving the physical and visual connection between it and the surrounding area.
- 10.27 In determining the original application, Camden recognised that the development introduces a new identity to the site, with a character that is notably denser than much of the surrounding area and taller in several aspects. However, it carries *“an assured and confident identity that aligns with a positive vision for community and place”*. Officers consider the character to be acceptable, highlighting that it *“draws from the area’s heritage and culture”* while enhancing the *“appearance and vitality of its surroundings through both its design and function.”*
- 10.28 The taller elements of the development are thoughtfully positioned to mark key routes and public spaces. While the main scale at the Gilbey’s Yard level is 7 storeys, the development offers a range of heights across the site. Taller structures and shorter buildings are placed near the rear of the Oval Road properties, responding positively to the Framework’s directive for *“variation in building heights.”*
- 10.29 Situated at the heart of the site, Building B and F form the primary housing and mixed-use structures. Their designs are distinct: Block B is robust and singular, while Block F serves as a mediator between the different building scales and features a more varied roofline. The skyline is further enriched by the sloping roofs of Block E2 and the sawtooth profile of the urban farm on Block B, providing added visual interest that mirrors the diversity of roof forms in the surrounding townscape.
- 10.30 In essence, the overall character and appearance of the site result from its layout, the variation in height, scale, and massing, the thoughtful distribution of uses, and the detailed design of individual buildings and spaces. The yard-like spaces offer a range of experiences, from the larger civic space of the Goods Yard to the smaller Maker’s and Camden Yards, defined by surrounding employment uses, to the more intimate neighbourhood space at Southampton Square and the more naturalistic Railway Park.
- 10.31 The Camden Goods Yard masterplan enhances the site’s integration with the Town Centre, diminishing its ‘island’ effect. While the site’s boundaries, defined by rail infrastructure and low-density residential development to the north and south, limit connectivity and intensification, officers believe the scheme successfully achieves the policy objectives in the framework and broader development plan. It introduces a diverse mix of uses at a suitable scale and density for the Town Centre, which will attract varied populations who visit, live, and work on the site. The uses have been thoughtfully distributed across the site to ensure that every part of the development contributes to the vitality of the neighbourhood.



- 10.32 The masterplan places new public spaces at both ends of the site, connected by a clear, grid-like network of routes that link directly to external pathways. The buildings, varied in their architectural details yet internally consistent in scale and style, collectively contribute to the site's character, drawing on the legacy of the former Goods Yard's yards and buildings.
- 10.33 The masterplan aligns with the Framework's principles and guidance, as well as the broader development plan, by facilitating the creation of a new, high-density, well-connected, mixed-use urban neighbourhood. This will complement and support the Town Centre, providing a diverse range of options in the public realm to sustain new communities living and working on the site.
- 10.34 The proposed design will provide heritage benefits through its architecture and landscaping. These benefits help to balance instances of less than substantial harm when assessing the overall impact of the proposed development.

### Public Realm and Open Space

- 10.35 The quality of public realm at the Site will be greatly enhanced through the introduction of a legible network of pedestrian and cyclist routes and public spaces framed by buildings which respond to the activities, uses and character of each space. These include new green spaces, play spaces and a dedicated youth space.
- 10.36 The DRP undertaken for the Camden Goods Yard masterplan, recommended that careful attention be given to *'differentiating the public spaces from one another'*.
- 10.37 These proposals retain this approved with a diverse range of spaces with varying characters and scales, from large civic and natural open areas to smaller neighbourhood spaces, all connected by a series of clear and appealing green routes.
- 10.38 These public spaces provide a variety of functions and characters, offering civic and communal space for the enjoyment of future residents and visitors of the Site as well as links and connections to the surrounding environs.
- 10.39 Planting plays a significant role throughout the site, contributing both as a visual amenity and as part of active food-growing initiatives, which benefit the health and well-being of the site's residents, workers, and visitors. The widespread distribution of planting across the site is seen as effectively tackling these challenges. In this way, the planting creates *'a green place that is environmentally sustainable and responsible'*.
- 10.40 The design of the public spaces has been carefully tailored to the site's microclimate. Areas with lower daylight and/or higher wind speeds are typically designed as transient streets, where the space's primary function is to facilitate movement rather than accommodate activities like sitting, playing, or socialising. In areas where there is a clash between microclimate and function, such as in Maker's Yard, mitigation measures will be implemented. The planting strategy is also responsive to the varying levels of shade and sunlight across the site.
- 10.41 Overall, the development proposes a variety of spaces and routes, each with its unique character. Together, they will offer a range of social and environmental benefits, demonstrating a high-quality approach to 21st-century landscape design.

## Commercial

- 10.42 The development will feature a variety of commercial and other non-residential uses that will complement the mixed-use nature of the scheme. The placement and proportion of each use are carefully balanced to provide variety across the site while ensuring that activities remain complementary to the Town Centre and considerate of residential amenity. The employment offer is diverse and flexible, contributing to the support of local economic activities, and the site is expected to create a significant number of new jobs.
- 10.43 The Camden Goods Yard masterplan replaces the existing Morrisons supermarket with a new and improved modern facility which meets the needs of existing and future customers.

## Transport

- 10.44 The key transport principles guiding the scheme have significantly influenced the outcomes of the masterplan, including:
- New, accessible pedestrian and cycle routes
  - A car-free residential and office development with limited vehicle access to the site
  - On-site public transport infrastructure located near the areas of highest demand
  - Reduced foodstore parking, with plans to further limit the spaces
  - Provision of on-site servicing for taxis, residential, foodstore, and office deliveries
  - Repurposing existing road space for more intensive use (e.g., PFS building and current bus stands)
- 10.45 These principles secure the necessary infrastructure and services for the growing population of residents, workers, and visitors, while ensuring that growth is managed in a way that preserves amenity, promotes sustainable transport choices, and helps to create vibrant, active streets.
- 10.46 The development will bring extensive public realm improvements that will redefine the relationship between the site and the surrounding Town Centre. The pedestrian and cycle environment around the main entrance via Chalk Farm Road will be significantly enhanced, providing future-proofed capacity to accommodate increased pedestrian traffic.

## Health & Wellbeing

- 10.47 The development places a strong focus on pedestrian priority and accessibility. The two existing entry points are enhanced with new public spaces that create a welcoming, car-free environment for visitors, residents, and workers. Cyclists are accommodated on shared street spaces, transitioning from the bustling Chalk Farm Road to the quieter Stephenson Street, and further into the home-zone-like Engine House Way and Winding House Way. The design also includes Healthy Street features such as shade, resting areas, reduced noise and vehicle exposure, and clear, direct routes connecting different parts of the site. These elements contribute to the site's support for active travel in line with the TfL Healthy Streets Initiative.
- 10.48 The development incorporates community-based amenities throughout its design. The public realm offers a range of activities, from relaxing on grass to ball games and nature or food-

growing spaces. The scheme aligns well with the Health and Wellbeing objectives of the Local Plan which promotes a neighbourhood focused on health and wellbeing.

### Safety and security

10.49 The Camden Goods Yard masterplan proposals have been designed with careful consideration of the local community safety context, especially due to the site's proximity to the vibrant night-time economy across the boundary. The layout and design of the streets and spaces have been directly informed by principles of crime prevention through environmental design. Officers believe the mixed-use nature of the development will foster a neighbourhood that appeals to a diverse range of people. The commercial uses will operate throughout the day and evening, with small food and drink venues on-site that will cater to residents and attract visitors.

### Completion of Masterplan

10.50 Completion of the masterplan comprising:-

- 359 homes, of which 23 are London affordable rent
- new Juniper office building and retail floorspace (13,797sqm GEA)
- new retail (644sqm GEA)
- offices (929sqm GEA)
- workspace (582sqm GEA)
- affordable workspace (951sqm GEA);
- community facility;
- food growing; civic space; green amenity space; public play space; and
- car club (2 bays)

### Conclusions

10.51 The public benefits, as highlighted above, remain unchanged from the consented scheme as a result of this application. This application includes the continued delivery beyond Phase 1 including commercial floorspace, workspace and affordable workspace, community facilities, food growing, civic space and green amenity space, including public play space.

10.52 The benefits of the scheme should be read in the context of the Government's ambition for a radical plan to get Britain building, to not only get the homes we desperately need, but to also drive the growth, create jobs and breathe life back into our towns and cities. There is not only a professional responsibility but a moral obligation to see more homes built.

## The Planning Balance

10.53 Balancing the weight of development plan compliance, the application of the tilted balance and presumption in favour of sustainable development, compliance with the Framework, and in particular paragraph 125 c, the benefits of the development and the material considerations that we identify, there is clear support for the S73 Application and planning permission should be granted.

# 11 Section 106 Deed of Variation: Draft Heads of Terms

---

11.1 A Deed of Variation (“DoV”) will be made to the Section 106 (“S106”) Agreement. It is anticipated that the DoV to the s106 will include the following Heads of Terms.

## Affordable Housing

- Revised definitions to reflect reduction in quantum; mix; tenure split of affordable housing.
- Inclusion of late-stage viability review mechanism.
- Revisions to Open Market Housing/Affordable Housing delivery triggers.
- Revised Affordable Housing Plans
- Revised Accommodation Schedule

## Other Definitions

- Revisions to incorporate this S73 application/permission
- Other consequential amendments to reflect the S73 proposals for the Main Site and updated planning documentation (e.g. updated sustainability, energy and renewables plans, whole life carbon reports).

## Other Revised Plans

- Affordable Workspace - layout updates
- Light Industrial Workspace - *[Block A NMA (ref. 2024/4241/P) approved updates]*
- Public Realm amendments, based on Block E1 footprint change

11.2 The applicant intends to discuss the Heads of Terms with the Council during the determination period.

## 12 Conclusion

---

- 12.1 The S73 Application accords with the Framework and represents sustainable development within the meaning of the Framework.
- 12.2 The Prime Minister and Deputy Leader and Secretary of State for Housing, Communities and Local Government have identified an '*acute and dire national housing crisis*' which has very real social and economic impacts. They have directed an '*urgent requirement*' to '*build more homes*', and a '*moral*' and '*professional*' responsibility to deliver them.
- 12.3 This need is no more apparent than in Camden where housing delivery has been poor, sustainable brownfield land for housing, new jobs and economic growth is scarce, housing needs are acute, and the Site is prepared for development.
- 12.4 This S73 Application ensures that the buildings continue to meet all relevant fire safety legislation and building regulations and the revised level of affordable housing provided will allow the development to continue to be viably built out (with any improvements in market conditions assessed as part of late stage review mechanism to secure an appropriate uplift in affordable contributions) - is the very kind of proposal that the Secretary of State insists must be granted planning permission without delay.
- 12.5 For the reasons set out in this report we consider that planning permission should be granted.



## Appendix 1

### DESCRIPTION OF DEVELOPMENT FOR PURPOSES OF CONSULTATION

---





## Appendix 1

### CONSULTATION DOD

---

For the purposes of public consultation only, it is requested that the following description is used:

Variation of Conditions 3, 4, 5, 6 (approved drawings and documents) and 73 (Number and mix of residential units) of planning permission 2017/3847/P dated 15/6/18 (as amended by 2020/0034/P dated 05/05/2020, 2020/3116/P dated 03/12/2020, 2022/0673/P dated 23/02/22, and 2022/3646/P dated 29/03/23) for the:

'Redevelopment of petrol filling station (PFS) site to include the erection of a new building to accommodate flexible retail/food & drink floorspace (Class A1, A3 uses), Class B1 floorspace; with cycle parking, public space, public toilets and other associated works and highways works; all following demolition of existing petrol filling station. Use for a foodstore (Class A1 use) with associated car parking for a temporary period. Redevelopment of the main supermarket site to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) for new homes (Class C3 market and affordable) together with non-residential floorspace comprising foodstore (class A1), flexible retail/food & drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, cafe and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore'.

Amendments to include: 637 homes, including 83 affordable homes (15% affordable by habitable room); Minor mix changes to approved plans; Marginal increase to building footprint of Block E1 (0.5m on north, east and west side); Reduction in building height of Block C from 73.9m AOD to 73.3m AOD, Block E1 from 73.4m AOD to 70.4m AOD, Block E2 from 52.9m AOD to 52.2m AOD and 45.4m AOD to 45.0m AOD, Block F1 from 68.2m AOD to 67.9m AOD, Block F2 from 73.8m AOD to 72.0m AOD, Block F3 from 64.4m AOD to 64.0m AOD and 54.0m AOD to 53.1m AOD; Marginal increase in building height of Block D from 54.3m AOD to 55.7m AOD to accommodate lift overrun; Introduction of Second Staircase to Block C, E1 and F to meet Fire Safety Regulations; Relocation of Morrisons emergency escape stairs; Updates to condition 3, 4, 5, 6 (approved drawings and documents) and 73 (Number and mix of residential units). This application is accompanied by an addendum to the original Environmental Statement.



## Appendix 2

### **AUTHORITY MONITORING REPORT (AMR) 2024**

---



# Authority Monitoring Report (AMR)

2021/22 and 2022/23



# Contents

Chapter 1: Introduction.....	1
Chapter 2: Housing .....	7
Chapter 3: Economy and Jobs .....	15
Chapter 4: Town Centres and shopping.....	20
Chapter 5: Sustainability and climate change .....	26
Chapter 6: Transport .....	32
Chapter 7: Heritage .....	35
Chapter 8: Basements.....	36
Chapter 9: Infrastructure Delivery.....	38

# Chapter 1: Introduction

- 1.1 Under the Planning regulations, local planning authorities must publish information that:
  - shows how the implementation of their adopted plans is progressing
  - reports on local plan preparation
  - reports any activity relating to the duty to co-operate
  - provides up-to-date information on neighbourhood plans.
- 1.2 Its purpose is to assess the extent to which the policies set out in the 2017 Camden Local Plan are being achieved. The information in this report allows Camden's planning service to identify which policies are performing as intended and if any need to be reviewed.
- 1.3 This AMR reports on the period **1 April 2021 to 31 March 2023**.

## Progress with policy documents

- 1.4 This section provides an update on the progress of all planning policy documents being prepared in relation to the indicative timetables in the Council's [Local Development Scheme \(LDS\)](#). The most recent LDS was published in December 2023.

### Draft new Local Plan

- 1.5 The Council is preparing a new Local Plan for Camden. The draft new Local Plan sets out the Council's vision for future development in the borough over the period from 2026 to 2041 and includes planning policies and site allocations to help us achieve this.
- 1.6 The Council published the draft new Local Plan for public consultation and engagement from January to March 2024. The results of this engagement will be used to inform the development of the next version of the Local Plan that will be published for further consultation and engagement towards the end of 2024.
- 1.7 Following this, the Plan will be submitted for public examination by a Planning Inspector and further comments invited. If the Plan is found sound it will be adopted by the Council for use in planning decisions, superseding the Camden Local Plan 2017 and the Site Allocations Plan 2013.

### Euston Area Plan

- 1.8 The Euston Area Plan is a strategic plan to help shape change in the area around Euston Station up to 2031. It seeks to ensure that, if the HS2 high speed rail link goes ahead, we can secure the best possible future for residents, businesses and visitors to Euston. It was prepared jointly by Camden Council, the Greater



London Authority and Transport for London and was adopted by the Council in 2015.

- 1.9 The Council consulted on an updated version of the Euston Area Plan at the start of 2023. Following government announcements on the future of HS2, further consultation on options for the redevelopment of the Euston Area is planned for Summer 2024.

#### Holborn Vision

- 1.10 The Council has prepared a Supplementary Planning Document to guide future development and investment in the Holborn area. The draft Holborn Vision was published for public consultation from February to April 2024. The Council are planning to adopt the Holborn Vision in Autumn 2024.

#### Camden Town Vision

- 1.11 The Council has commenced work on a vision for Camden Town. The vision will aim to guide future growth to ensure Camden Town is a successful, attractive, safe and sustainable place. Consultation on the draft vision is planned for Summer 2024.

### **Planning documents recently adopted**

#### Statement of Community Involvement

- 1.12 The SCI sets out how the Council involves local people when considering planning applications and preparing our planning policies. The Council consulted on a revised SCI from December 2023 to January 2024. The updated SCI was adopted by the Council on 19 April 2024.

### **Other planning documents**

**Table 1 – Other Planning Documents**

<b>Document</b>	<b>Description</b>	<b>Publication Year</b>	<b>Status</b>
<a href="#">Camden Local Plan</a>	The Local Plan is the Council's main planning document and sets out planning policies to manage development in Camden.	2017	Under review. Will be superseded by the new Local Plan once adopted.
<a href="#">Site Allocations Local Plan</a>	The Site Allocations Local Plan allocates sites for development in Camden and sets out the Council's expectations for them.	2013	Under review. Will be superseded by the new Local Plan once adopted.

<a href="#">Fitzrovia Area Action Plan</a>	The Fitzrovia AAP responds to the significant pressure for development in this area and co-ordinates development proposals across a number of significant sites.	2014	The new Local Plan will replace the policies and guidance relating to specific opportunity sites within the Fitzrovia Area Action Plan once adopted.
<a href="#">North London Waste Plan</a>	The North London Waste Plan sets out the planning framework for waste management in the seven north London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. It identifies a range of suitable sites for the management of all North London's waste up to 2031 and includes policies and guidance for determining planning applications for waste developments.	2022	Adopted. For further details please visit: <a href="http://www.nlwp.net">www.nlwp.net</a>
<a href="#">Local Plan Policies Map</a>	The Local Plan Policies Map sets out the adopted policies from all development plan documents geographically, showing key sites for development and the areas where particular policies apply.	2017	The current policies map will be updated once the new Local Plan is adopted.
<a href="#">Community Infrastructure Levy (CIL) Charging Schedule</a>	The Community Infrastructure Levy is a charge collected from new developments, which funds key infrastructure such as transport projects, health care centres and community facilities. The CIL Charging Schedule sets out the charges that will apply to new	2020	Adopted. For further details please visit: <a href="https://www.camden.gov.uk/community-infrastructure-levy">https://www.camden.gov.uk/community-infrastructure-levy</a>



	development coming forward in Camden.		
Camden Planning Guidance	Camden Planning Guidance (CPG) is a series of documents that provide further advice and information on how we will apply our planning policies.	Phase 1 - 2018 Phase 2 - 2019 Phase 3 - 2021	Adopted. For further details please visit: <a href="https://www.camden.gov.uk/planning-policy-documents">https://www.camden.gov.uk/planning-policy-documents</a>
Area Frameworks	The Council has prepared a series of planning frameworks and briefs to help support and guide the redevelopment of specific sites and areas.	Various	Adopted. For further information please visit <a href="#">Planning frameworks and briefs - Camden Council</a>

## Neighbourhood planning

- 1.13 Neighbourhood plans are planning documents that are prepared by the community, with the Council providing support and advice, to influence the future of their area by setting out their vision and general planning policies to shape and direct development in their neighbourhood.
- 1.14 Neighbourhood Forums are valid for 5 years from the date of designation. When the five-year period ends forums need to be re-designated if they are to continue working on statutory neighbourhood planning matters. As of 31 March 2024, there were eight neighbourhood forums in Camden designated within the previous five years. (Neighbourhood Area designations do not have a time limit.)

**Table 2 - Dates of neighbourhood area and forum designations**

Name	Area designated	Forum designated	Forum re-designated
Camley Street	21 Feb 2014	21 Feb 2014	10 May 2019
Church Row and Perrins Walk	05 Sept 2014	05 Sept 2014	
Dartmouth Park	07 Oct 2018	07 Oct 2013	17 Dec 2018
Drummond Street	10 May 2019	10 May 2019	
Fitzrovia East	03 April 2014		
Fortune Green and West Hampstead	09 May 2013	09 May 2013	12 April 2019

Hampstead	07 Oct 2014	07 Oct 2014	25 Oct 2019
Highgate (also covers part of Haringey)	17 Dec 2012	07 Dec 2012	26 March 2018 8 Sept 2023
Kilburn (also covers part of Brent)	03 June 2016	03 June 2016	28 Jan 2022
Kentish Town	10 April 2013	10 April 2013	01 June 2018
Mount Pleasant (also covers part of Islington)	04 Feb 2016	04 Feb 2016	08 Sept 2023
Redington and Frognal	05 Sept 2014	05 Sept 2014	25 Oct 2019
Somers Town	13 June 2013	13 June 2013	

1.15 Camden has adopted ('made') seven Neighbourhood Plans prepared by the local community, following independent examinations and public referendums:

- [Fortune Green and West Hampstead Neighbourhood Plan \(September 2015\)](#)
- [Kentish Town Neighbourhood Plan \(September 2016\)](#)
- [Highgate Neighbourhood Plan \(September 2017\)](#)
- [Hampstead Neighbourhood Plan \(October 2018\)](#)
- [Dartmouth Park Neighbourhood Plan \(March 2020\)](#)
- [Redington and Frognal Neighbourhood Plan \(Sept 2021\)](#)
- [Camley Street Neighbourhood Plan \(Sept 2021\)](#)

1.16 The Council is also working with LB Brent to support the Kilburn Neighbourhood Forum including support on preparing their draft neighbourhood plan, which was published for consultation from October 2023 to January 2024.

## **Duty to co-operate**

1.17 Under the Localism Act 2011, councils are required "to engage, constructively, actively and on an ongoing basis" with neighbouring planning authorities, and other prescribed bodies (as set out in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012), on strategic cross-boundary matters relating to the preparation of local development documents. The Council maintains a full record of Duty to Co-operate actions which is presented at public examinations for the preparation of all relevant documents. A list of key Duty to Co-operate actions for the reporting years are set out below.

### **Duty to co-operate actions 2021/22**

1.18 Key actions included:

- Regular meetings with the GLA to discuss viability matters (quarterly) and with Registered Providers of affordable housing to discuss general strategic issues
- Met with Islington to discuss strategic matters (March 2021)
- Met with Westminster to discuss strategic matters (March 2021)
- Met with Haringey to discuss strategic matters (April 2021)
- Met with Brent to discuss strategic matters (July 2021)
- Officers regularly attended ALBPO meetings with London authorities and GLA representatives to discuss general strategic issues
- Officers attended Central London Forward policy officer meetings with other Central London boroughs.

### **Duty to co-operate actions 2022/23**

#### **1.19 Key actions included:**

- Regular quarterly meetings with the GLA to discuss viability matters (quarterly) and with Registered Providers of affordable housing to discuss general strategic issues
- Met with Islington Council to discuss strategic matters including Neighbourhood Planning (June 2022)
- Met with the Corporation of London to discuss strategic matters (October 2022)
- Met with Haringey Council to discuss strategic matters (February 2023)
- Officers regularly attended ALBPO meetings with London authorities and GLA representatives to discuss general strategic issues
- Officers attended Central London Forward policy officer meetings with other Central London boroughs.

Note: Meetings with our neighbouring authorities were also undertaken both immediately before and after the period covered by this report.

## Chapter 2: Housing

- 2.1 The [Camden Local Plan 2017](#) includes a number of policies to maximise the supply of housing in the borough and to protect existing homes. The plan also seeks to support the delivery of a range of housing types suitable for households and individuals with different needs. Relevant policies include:
- Policy H1 Meeting housing needs
  - Policy H2 Maximising the supply of self-contained housing from mixed use schemes
  - Policy H3 Protecting existing homes
  - Policy H4 Maximising the supply of affordable housing
  - Policy H5 Protecting and improving affordable housing
  - Policy H6 Housing choice and mix
  - Policy H7 Large and small homes
  - Policy H8 Housing for older people, homeless people and vulnerable people
  - Policy H9 Student housing
  - Policy H10 Housing with shared facilities
  - Policy H11 Accommodation for travellers
- 2.2 This section focuses on the progress we are making with delivering the aims and objectives set out in the Local Plan in relation to meeting housing needs. It monitors progress in relation to five key indicators, which are set out below.

### Meeting Housing Needs Indicator 1

To **deliver 1,038 net additional homes per year** to meet the housing target set for Camden in the 2021 London Plan

- 2.3 The Camden Local Plan 2017 identifies a need for 1,120 homes (self and non-self-contained) per year over the plan period to 2031.
- 2.4 The London Plan 2021 sets a housing target for Camden of 10,380 additional homes over a ten year period from 2018/19 to 2028/29, which equates to a need to deliver a minimum of 1,038 homes per year. This includes 3,280 homes from small sites.
- 2.5 The housing target in the London Plan superseded the housing target in the 2017 Local Plan and is therefore used as the basis for our housing monitoring.
- 2.6 Table 3 below shows the total number of homes approved across the monitoring period and Table 4 below shows total housing completions over the monitoring period.

**Table 3 – Total number of homes approved**

<b>Monitoring Year</b>	<b>2021/22</b>	<b>2022/23</b>
<b>Self- contained homes</b>	376	267
<b>Non self-contained housing (C3 equivalent)</b>	-82	0
<b>Total (net)</b>	351	267

GLA Planning London Datahub

**Table 4 – Total housing completions**

<b>Monitoring Year</b>	<b>2021/22</b>	<b>2022/23</b>
<b>Housing Target</b>	1,038	1,038
<b>Self-contained homes</b>	536	358
<b>Non self-contained housing (C3 equivalent)</b>	-4	6
<b>Total (net)</b>	532	364

GLA Planning London Datahub

- 2.7 Over the plan period to date (from 2016/17 to 2022/23) a total of 5,423 (net) additional self-contained homes have been completed in the borough.
- 2.8 Self-contained housing is the priority land use in the Local Plan. Self-contained homes are those where all the rooms, including the kitchen, bathroom and toilet, are behind a door that only one household can use (Use Class C3). Figures for self-contained homes also include properties in Use Class C4 as changing the use in either direction between C3 and C4 is permitted by the General Permitted Development Order (so does not require planning consent). (Use Class C4 refers to small houses in multiple occupation, these are houses or flats occupied by three to six residents comprising two or more households and sharing facilities such as kitchens, bathrooms or living rooms).
- 2.9 Over the plan period to date (from 2016/17 to 2020/21) there has been a total loss (net) of 134 non-self-contained units.
- 2.10 Non-self-contained housing refers to student accommodation, care homes, hostels for long-term residents, and larger houses in multiple occupation (houses or flats occupied by more than six residents comprising two or more households and sharing facilities such as kitchens). Projected additions or losses of

bedrooms in non-self-contained housing are converted into an equivalent number of self-contained homes (C3) by applying the factors set out in London Plan paragraph 4.1.9.

### Meeting Housing Needs Indicator 2

To deliver 353 additional affordable homes per year to meet the borough strategic target of 5,300 **additional affordable homes** from 2016/17 – 2030/31

- 2.11 Policy H4 'Maximising the supply of affordable housing' of the Camden Local Plan 2017 seeks on-site affordable housing from developments with capacity for 10 additional homes or more, and seeks financial contributions from smaller developments that create additional residential floorspace and homes. A target of 50% affordable housing (by floorspace) applies to developments with capacity for 25 additional homes or more.
- 2.12 Table 5 below shows the number of affordable homes completed from the start of the Local Plan period (2016/17) to 2022/23 and also sets out the financial contributions received in lieu of affordable housing being provided on-site.

**Table 5 – Affordable housing completions**

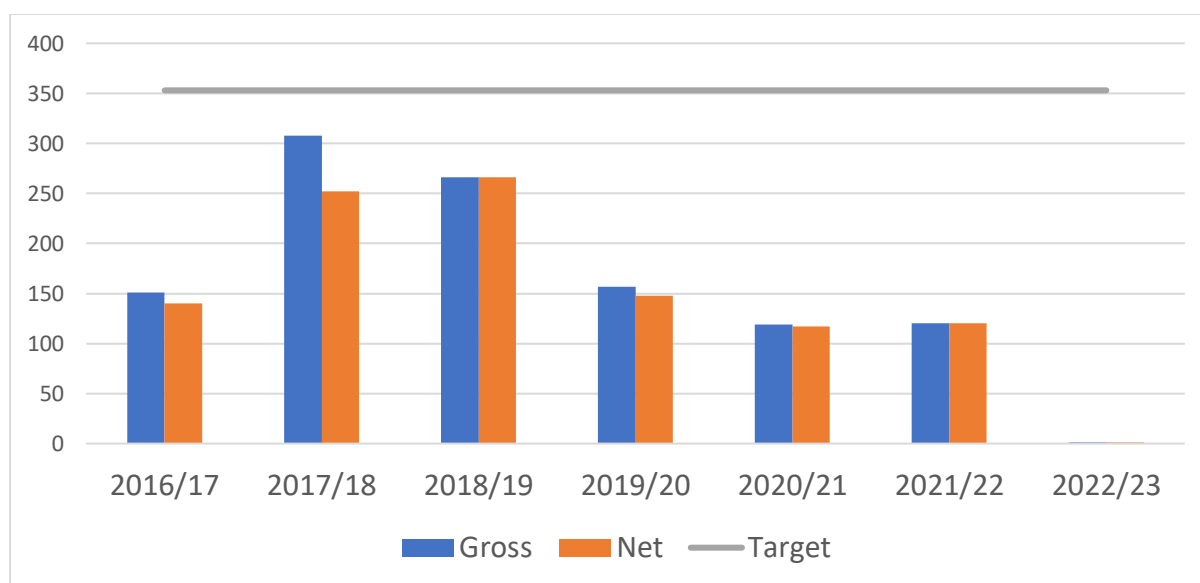
Monitoring Year	Total number of completed self-contained homes including affordable housing		Affordable housing completed (number of homes)		Financial contribution in lieu of affordable housing secured
	Gross	Net	Gross	Net	
2016/17	1,395	1,263	151 (11%)	140 (11%)	£11.7m
2017/18	1,102	945	308 (28%)	252 (27%)	£2.9m
2018/19	941	827	266 (28%)	266 (32%)	£1.04m
2019/20	1,121	985	157 (14%)	148 (15%)	£4.40m
2020/21	525*	509*	119 (23%)*	117 (23%)*	£1.62m
2021/22	464	536	120 (20%)	120 (22%)	£9.0m
2022/23	386	358	1 (0%)	1 (0%)	£2.0m

London Development Database / \* Planning London Datahub / Housing Flow Reconciliation: calculated using a new GLA / DLUHC protocol – losses are counted when development starts, not completion.

Note: gross figures include all homes completed, whereas the net figures take into account the number of homes lost through demolition or conversion as part of the development

- 2.13 Over the plan period to date (from 2016/17 to 2022/23) a total of 1,044 (net) additional affordable homes have been completed in the borough.

**Figure 1 - Affordable housing completions against the target**



### Meeting Housing Needs Indicator 3

To deliver 160 additional student housing places per year, to meet the borough target of 2,400 **additional student places** from 2016/17 – 2030/31

- 2.14 The Camden Local Plan sets a target for at least 2,400 additional places in student housing over the plan period (2016/2017 to 2030/31), equivalent to 160 places per year (see Policy H9 Student Housing).
- 2.15 Table 6 below shows the number of student places approved over the monitoring period and Table 7 below shows the number of student places completed in the borough from the start of the local plan period to 2022/23.



**Table 6 – Student places approved**

Monitoring Year	Gains	Losses	Total
2021/22	0	0	0
2022/23	0	0	0

Planning Policy, London Borough of Camden

**Table 7 – Student places completed**

Monitoring Year	Monitoring Target	Student places completed		
		Gains	Losses	Total
2021/22	160	0	0	0
2022/23	160	0	0	0
<b>Total</b>		0	0	0

GLA Planning London Datahub.

- 2.16 Over the plan period to date (from 2016/17 to 2022/23) a total of 223 additional student places have been completed in the borough. However, there have been no recorded gains or losses over the monitoring period.

#### **Meeting Housing Needs Indicator 4**

To protect existing and support the provision of new care homes, hostels and homes in multiple occupation.

- 2.17 Local Plan Policy H8 Housing for older people, homeless people and vulnerable people resists the loss of floorspace in a variety of uses including sheltered housing, care homes, and hostels for homeless people. Policy H10 Housing with shared facilities resists the loss of bedsits in houses in multiple occupation, long-stay hostels and other long-term accommodation where some rooms and facilities are shared by people from different households.
- 2.18 Approvals and completions data for self-contained supported housing (Use Class C3) and self-contained small houses in multiple occupation (Use Class C4) are recorded as part of Tables 3 and 4 above.

- 2.19 Table 8 below shows the number of non-self-contained homes (bedrooms) (care homes, hostels and homes in multiple occupation) approved over the monitoring period.

**Table 8 – Non-self-contained homes approved (bedrooms) (care homes, hostels and homes in multiple occupation)**

Monitoring Year	Gains	Losses	Total
2021/22	41	-113	- 72
2022/23	0	0	0

GLA Planning London Datahub

- 2.20 The losses recorded in Table 8 are largely the result of the closure of two former Council care homes, which have been replaced in other parts of the borough. Such losses can arise from criteria in Policies H8 and H10 that allow for losses of accommodation in certain circumstances, notably when replacement provision is made elsewhere, or when the existing accommodation is incapable of meeting contemporary standards.

- 2.21 Table 9 below shows the number of non-self-contained homes (bedrooms) (care homes, hostels and homes in multiple occupation) completed over the monitoring period.

**Table 9 - Non-self-contained homes (bedrooms) (care homes, hostels and homes in multiple occupation) completed**

Monitoring Year	Gains	Losses	Total
2021/22	0	-8	-8
2022/23	10	0	10
<b>Total</b>	10	-8	2

GLA Planning London Datahub.

- 2.22 Over the plan period to date (from 2016/17 to 2022/23) there has been a total net loss of 322 non-self-contained units (bedrooms)(care homes, hostels and homes in multiple occupation).

### Meeting Housing Needs Indicator 5

To secure a **range of housing types** to meet housing needs

2.23 The Council aims to secure a range of suitable housing types, as well as a range of tenures. Camden Local Plan Policy H7 states that Camden “will contribute to the creation of mixed and inclusive communities” by securing a range of self-contained homes of different sizes, requiring all housing development to include a mix of large and small homes.

2.24 Table 10 below shows the percentage mix of home sizes completed in the borough over the plan period to date.

**Table 10 – Percentage mix of home sizes completed**

Year	Studio	1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom
2016/17	10%	36%	41%	10%	2%	1%
2017/18	3%	28%	44%	20%	4%	>1%
2018/19	3%	31%	40%	19%	5%	1%
2019/20	3%	34%	42%	17%	3%	1%
2020/21	2%	37%	40%	17%	2%	1%
2021/22	2%	21%	47%	22%	4%	4%
2022/23	3%	29%	48%	16%	5%	0%

GLA Planning London Datahub

2.25 Policy H7 also seeks to ensure that all housing development contributes to meeting the priorities set out in the dwelling size table below. The Local Plan Dwelling Size Priorities Table (Table 11) is based on the outputs of the Camden Strategic Housing Market Assessment 2016, considered alongside the mismatch between the need for large affordable homes (indicated by overcrowding) and supply (indicated by average number of bedrooms per household) and the cost constraints on delivering large intermediate homes. Dwelling sizes are expressed in terms of number of bedrooms and distinct priorities are identified for market housing, intermediate housing and social-affordable rent. In addition to this, through Camden Planning Guidance, the Council also sets a target for 50% of social-affordable rented homes to be large homes with three-or-more bedrooms.

**Table 11 – Local Plan Dwelling Size Priorities**

	<b>1 bedroom or studio</b>	<b>2 bedroom</b>	<b>3 bedroom</b>	<b>4 bedroom</b>
<b>Social affordable rented</b>	Lower	High	High	Medium
<b>Intermediate affordable</b>	High	Medium	Lower	Lower
<b>Market</b>	Lower	High	High	Lower

2.26 Tables 12 and 13 below show the mix that has been delivered in each of the three main tenures (Social affordable rent, Intermediate, Market) over the monitoring period.

**Table 12 – Percentage mix of home sizes completed by tenure 2021/22**

	<b>Studio</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>5 bed</b>	<b>Tenure percentage of all homes</b>
<b>Social affordable rent</b>	13%	13%	25%	25%	25%	0%	7%
<b>Intermediate</b>	0%	33%	50%	17%	0%	0%	3%
<b>Market</b>	5%	30%	25%	20%	12%	9%	90%

GLA Planning London Datahub

**Table 13 – Percentage mix of home sizes completed by tenure 2022/23**

	<b>Studio</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>5 bed</b>	<b>Tenure percentage of all homes</b>
<b>Social affordable rent</b>	0%	0%	0%	0%	0%	0%	0%
<b>Intermediate</b>	100%	0%	0%	0%	0%	0%	1%
<b>Market</b>	3%	27%	31%	22%	13%	4%	99%

GLA Planning London Datahub

## Chapter 3: Economy and Jobs

- 3.1 The [Camden Local Plan 2017](#) includes a number of policies to support economic growth and protect employment sites in Camden. The Plan also seeks to secure and retain jewellery workshops and related uses in the Hatton Garden Jewellery Industry Area. In addition to supporting tourism development and visitor accommodation. Relevant policies include:
- Policy G1 Delivery and location of growth
  - Policy E1 Economic development
  - Policy E2 Employment premises and sites
  - Policy E3 Tourism
- 3.2 This section focusses on the progress we are making with delivering the aims and objectives set out in the Local Plan in relation to the local economy and jobs. It monitors progress in relation to four key indicators, which are set out below.

### Economy and Jobs Indicator 1

Deliver **net gains in employment floorspace** and job growth, including 695,000 square meters of additional office floorspace from 2014 - 2031

- 3.3 Policy G1 of the 2017 Camden Local Plan seeks to meet Camden's objectively assessed need for approximately 695,000 square meters of additional office floorspace over the Plan period to 2031 and Policy E1 sets out how we will deliver this, with a focus on directing new office development to the growth areas, Central London and Camden's town centres.
- 3.4 In 2020, the Government made changes to the Use Classes Order, which introduced a new 'Commercial, Business and Service' use class (Class E). This includes the former B1 use class as well as shops, financial services, restaurants and cafes, medical and health services, and nurseries. Changes between these uses are not considered 'development' and therefore a planning application (or prior approval application) is not needed.
- 3.5 Notwithstanding Use Class E, data on employment floorspace continues to be grouped in the previous B Use Class, that is, office (B1a), research and development (B1b), light industrial (B1c), general industrial (B2), storage and distribution (B8). Applications for employment floorspace that have not been categorised into B Use Classes, such as flexible E Use Class are recorded in paragraph 3.9.

**Table 14 - Net change in employment land floorspace, completed development**

	<b>B1 Business (including office, research and development, light industry)</b>	<b>B1a Office</b>	<b>B2 General industrial</b>	<b>B8 Storage and distribution</b>	<b>Gain + or Loss - of floorspace (square metres)*</b>
2014/15	26,102 sqm	26,587 sqm	-206 sqm	-5,659 sqm	20,237 sqm
2015/16	-14,120 sqm	-13,471 sqm	-1,176 sqm	-2,321 sqm	-17,617 sqm
2016/17	-27,905 sqm	-28,007 sqm	-390 sqm	-175 sqm	-28,470 sqm
2017/18	7,361 sqm	8,856 sqm	-142 sqm	-2,123 sqm	5096 sqm
2018/19	10,440 sqm	14,388 sqm	-525 sqm	-3,327 sqm	6588 sqm
2019/20	36,542 sqm	33,929 sqm	-74 sqm	-1,783 sqm	34,685 sqm
2020/21	92,546 sqm	85,579 sqm	-1858 sqm	-42 sqm	90,646 sqm
2021/22	-526 sqm	-86 sqm	-50 sqm	0 sqm	-576 sqm
2022/23	210 sqm	210 sqm	0 sqm	0 sqm	210 sqm
<b>Total</b>	<b>130,650 sqm</b>	<b>127,985 sqm</b>	<b>-4,421 sqm</b>	<b>-15,430 sqm</b>	<b>110,799 sqm</b>

\*Floorspace figures in the B1 Business column are for Use Classes B1(a), (b) and (c). The figures shown in the B1(a) office column are therefore a further breakdown of the figures in the B1 Business column. To avoid double counting the final column showing gains and losses of floorspace only includes the figures in the B1, B2 and B8 columns (not the B1(a) column, as these are already accounted for in the B1 column).

- 3.6 This shows that over the period from 2014 to 2023 a net gain in completed office floorspace of 127,985 square metres has been recorded.
- 3.7 Table 15 below shows the total employment floorspace either under construction or with planning permission but not started in the borough up to the end of the monitoring period.

**Table 15 - Planning approvals either under construction or not started 31 March 2023**

	<b>Not started</b>	<b>Under construction</b>
<b>Net B1</b>	18,189 sqm	501,638 sqm
<b>Net B2</b>	5483 sqm	802 sqm
<b>Net B8</b>	-10,741 sqm	2346 sqm
<b>Total</b>	12,931 sqm	504,786 sqm

3.8 Table 16 below shows the total employment floorspace approved, including losses, over the plan period to date.

**Table 16 - Net change in employment land floorspace, planning approvals**

	<b>B1 Business (including office, research and development, light industry)</b>	<b>B1a Office</b>	<b>B2 General industrial</b>	<b>B8 Storage and distribution</b>	<b>Gain + or Loss - of floorspace (square metres) *</b>
2016/17	83,699 sqm	76,284 sqm	-578 sqm	-7,159 sqm	75,962 sqm
2017/18	136,353 sqm	118,444 sqm	-2,964 sqm	-2,130 sqm	131,259 sqm
2018/19	60,257 sqm	61,682 sqm	-100 sqm	37 sqm	60,194 sqm
2019/20	66,333 sqm	65,711 sqm	-1,595 sqm	5,977 sqm	70,715 sqm
2020/21	4,054 sqm	1,715 sqm	-1260 sqm	860 sqm	3,654 sqm
2021/22	26,159 sqm	26,159 sqm	0 sqm	-10,831 sqm	15,328 sqm
2022/23	43,737 sqm	44,766 sqm	23 sqm	9466 sqm	53,226 sqm
<b>Total</b>	<b>408,866 sqm</b>	<b>372,579 sqm</b>	<b>-8,663 sqm</b>	<b>-13,505 sqm</b>	<b>386,698 sqm</b>

\*Floorspace figures in the B1 Business column are for Use Classes B1(a), (b) and (c). The figures shown in the B1(a) office column are therefore a further breakdown of the figures in the B1 Business column. To avoid double counting the final column showing gains and losses of floorspace only includes the figures in the B1, B2 and B8 columns (not the B1(a) column, as these are already accounted for in the B1 column).



- 3.9 Notwithstanding the figures in Table 16 above, 1,249 square metres of employment floorspace has also been gained in Use Class E planning approvals. These relate to two applications:
- 2021/4968/P 20-23 Greville Street, Use of existing part basement, part ground floor and first floor level for flexible Class E uses (not including affordable jewellery floorspace). (915sqm)
  - 2020/2144/P Holborn House 113 High Holborn, Change of use of 1st to 5th floors from Class D1 to Class E. (334sqm)

### **Economy and Jobs Indicator 2**

**No net loss of premises suitable for use as jewellery workshops** and related uses in the Hatton Garden Jewellery Industry Area

- 3.10 The Council promotes and protects the jewellery industry in Hatton Garden. The Hatton Garden area boundary can be viewed on the Council's [Local Plan Policies Map](#). Under our planning policies, we will only permit the conversion of employment premises in the Hatton Garden area, where it can be demonstrated that they have been vacant and marketed for at least two years and are replaced by a mixed-use development including jewellery workshops. The tables below show the jewellery workshop floorspace approved and completed over the monitoring period.

**Table 17 – Jewellery workshop floorspace approved**

	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
Gains	231 sqm	449 sqm	0 sqm
Losses	0 sqm	-139 sqm	-220 sqm
Total (net)	231 sqm	310 sqm	-220 sqm

**Table 18 – Jewellery workshop floorspace completed (net)**

<b>2014/15 to 2022/23</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
687 sqm	0 sqm	0 sqm	0 sqm

### **Economy and Jobs Indicator 3**

**Local training scheme places** achieved from completed development

- 3.11 The Local Plan explains how the Council will secure employment and training contributions through the planning process.
- 3.12 Table 19 below provides information on the number of apprenticeship places we have negotiated over the monitoring period.

**Table 19 - Total apprenticeship places secured through Section 106**

<b>2021/22</b>	<b>2022/23</b>
26 apprenticeships 19 work placements	436 apprenticeships 289 work placements

- 3.13 In addition to this, £200,000 was secured in 2021/22 and £1.1m in 2022/23 for employment and training initiatives.

### **Economy and Jobs Indicator 4**

Contribute to the London Plan target of achieving 58,000 **net additional hotel bedrooms** by 2041 across London

- 3.14 The London Plan sets a target of achieving 58,000 net additional hotel bedrooms across London by 2041. Table 20 below shows the net additional hotel bedrooms completed in Camden over the period from 2014/15 to 2022/23.

**Table 20 – Hotel room completions (net)**

<b>2014/15 to 2022/23</b>	<b>2021/22</b>	<b>2022/23</b>
2,492	0	30

## Chapter 4: Town Centres and shopping

- 4.1 The [Camden Local Plan 2017](#) identifies a need for an additional 30,000sqm of retail floorspace in Camden from 2014 to 2031. The Plan includes policies to support the vitality of Camden's town and shopping centres. Relevant policies include:
- Policy TC1 Quantity and location of retail development
  - Policy TC2 Camden's centres and other shopping areas
  - Policy TC3 Shops outside of centres
  - Policy TC4 Town centre uses
  - Policy TC5 Small and independent shops
  - Policy TC6 Markets
- 4.2 From 1st September 2020 substantial changes were made to the planning use classes. Of particular significance for centres is the introduction of Use Class E, which includes (former use classes in brackets): shops (A1); financial and professional services (A2); restaurants and cafes (A3); and offices (B1a). Changes of use within a use class are not considered to be development and therefore do not require planning permission. This reduces the Council's ability to influence planning and development within centres, including policies for managing the mix of uses in centres and frontages.
- 4.3 A limited number of common town centre uses, including (former use class in brackets): pubs (A4), hot food takeaways (A5), betting shops and laundrettes are not within Use Class E and are now considered to be/remains 'sui generis' (that is, not included in any use class). Changes from these uses still require a planning application to be submitted, meaning that the Council can influence their loss and the provision and location of new uses as appropriate.
- 4.4 This section focusses on the progress we are making with delivering the aims and objectives set out in the Local Plan in relation to Town Centres and shopping. It monitors progress in relation to three key indicators, which are set out below.

### Town Centres and Shopping Indicator 1

Minimise the number of **vacant premises**.

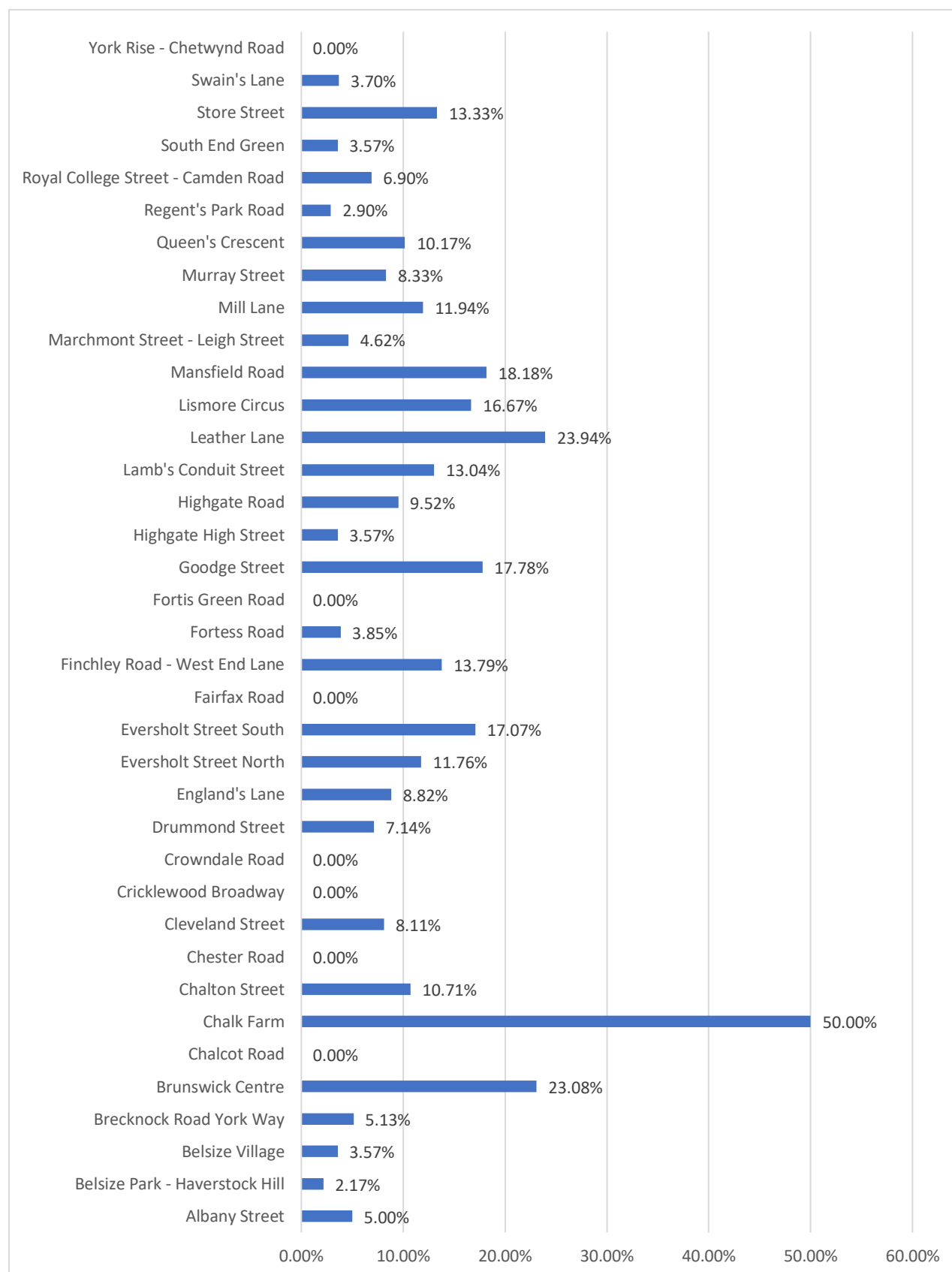
- 4.5 The proportion of vacant shops on shopping streets is an important indicator of the health of that centre. Our retail surveys have tracked changes in vacancies over time at a centre level. The most recent retail survey was undertaken in 2022, the results of which are available to view on our website [Camden Retail Frontages Survey | Open Data Portal](#). The location of the centres surveyed is shown on Camden's [Local Plan Policies Map](#).

- 4.6 Table 21 below shows the percentage of vacant premises in the boroughs designated shopping areas over the last five retail surveys, which were undertaken in 2016, 2017, 2018, 2019, and 2022.

**Table 21 – Vacant premises in designated shopping areas**

Type of shopping area	Retail survey year 2022	Retail survey year 2019	Retail survey year 2018	Retail survey year 2017	Retail survey year 2016
<b>Town Centres</b>					
Camden Town	8%	4%	4%	3%	5%
Finchley Road Swiss Cottage	8%	5%	5%	7%	3%
Hampstead	6%	5%	5%	3%	4%
Kentish Town	6%	10%	10%	10%	8%
Kilburn	6%	4%	4%	4%	7%
West Hampstead	4%	7%	7%	7%	6%
<b>Specialist Shopping Areas in Central London</b>					
Denmark Street	22%	36%	-	-	-
Fitzrovia	11%	6%	6%	6%	2%
Hatton Garden	2%	4%	4%	3%	3%
Museum Street	14%	3%	3%	4%	7%
Seven Dials	12%	9%	9%	10%	7%
<b>Central London Frontages</b>					
King's Cross	11%	7%	7%	3%	8%
High Holborn, Kingsway	16%	7%	7%	3%	5%
Tottenham Court Road, Charring Cross Road, New Oxford Street	7%	3%	3%	3%	7%
<b>Neighbourhood Centres</b>					
Neighbourhood Centres	9%	9%	9%	9%	7%

**Figure 2 - Percentage of vacant units in designated Neighbourhood Centres  
(2022 retail survey data)**

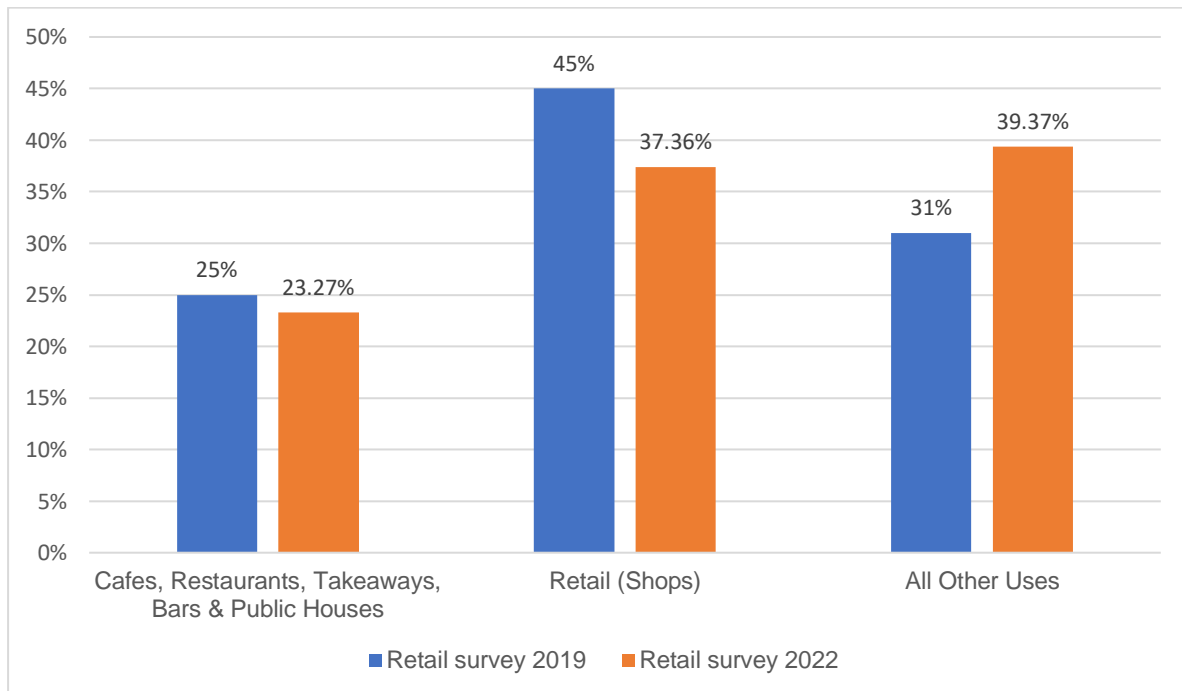


## Town Centres and Shopping Indicator 2

Protecting and improving Camden's shopping streets.

- 4.7 The Council seeks to protect the vitality and viability of its centres through the application of the retail policies in the Local Plan and through the control of shopping and other town centre uses on protected frontages.
- 4.8 As stated in the introduction to this section, many proposals previously subject to planning control no longer constitute development, and therefore a planning application will not be required because both the existing and proposed uses now fall within Use Class E. This means that a retail shop could change into a café without the need for planning permission.
- 4.9 Figure 3 below uses data from the 2019 and 2022 retail surveys and shows the balance of uses between eating and drinking establishments, shopping (retail), and other uses.

**Figure 3 – Proportion of retail, eating and drinking establishments in Camden's designated centres**



- 4.10 The Council recognises the importance of shopping streets in the borough as places for residents, workers, and visitors to shop, work, socialise, and access culture and services. Given this, in 2020 the Council launched its [Camden Future High Streets Prospectus](#) to support the future of our high streets.

- 4.11 Furthermore, the Council has also prepared an [evening and night time strategy](#), acknowledging the fact that the evening and night time economy is a significant part of Camden's economy and shapes the socio-economic and cultural experience and wellbeing of our residents, night workers, businesses, organisations and visitors.
- 4.12 The Council is also preparing new guidance to support future development and investment in the Holborn Area and Camden Town.

### **Town Centres and Shopping Indicator 3**

Deliver an **additional 30,000 square meters of retail floorspace** in Camden from 2014 to 2031.

- 4.13 Local Plan Policy G1 Delivery and location of growth, seeks to meet Camden's objectively assessed need for approximately 30,000 square metres of additional retail floorspace over the Plan period to 2031. Policy TC1 Quantity and location of retail development, sets out the Council's approach to the delivery of new retail uses, with a focus on growth areas; town centres; central London frontages; and neighbourhood centres.
- 4.14 Table 22 below sets out the proportion of retail floorspace completed, including gains and losses, for the main town centre uses (retail, financial and professional services, food and drink, and entertainment).

**Table 22 – Town Centres Uses (retail, financial and professional services, food and drink, and entertainment) – completions (net additional floorspace)**

<b>Monitoring year</b>	<b>Retail (shops)</b>	<b>Financial and professional</b>	<b>Restaurant and café</b>	<b>Drinking establishments (Public Houses / Wine Bar)</b>	<b>Hot food takeaway</b>
<b>2013/14</b>	360	-190	1,802	-291	146
<b>2014/15</b>	-742	888	1,932	-316	406
<b>2015/16</b>	2,374	-27	983	-447	-91
<b>2016/17</b>	2,549	689	976	-408	445
<b>2017/18</b>	668	220	2,271	633	511
<b>2018/19</b>	1,591	798	532	-2,137	55
<b>2019/20</b>	7,903	-326	8,604	2,816	346
<b>2020/21</b>	217	128	-95	104	80
<b>2021/22</b>	1,190	-48	0	0	0
<b>2022/23</b>	-50	68	153	68	0
<b>Total</b>	16,060 sqm	2,200 sqm	17,158 sqm	22 sqm	1,898 sqm



## Chapter 5: Sustainability and climate change

- 5.1 The [Camden Local Plan 2017](#) aims to tackle the causes of climate change in the borough and supports measures to increase resilience to the effect of a changing climate. The Plan includes the following relevant policies:
- CC1 Climate change mitigation
  - CC2 Adapting to climate change
  - CC3 Water and flooding
  - CC4 Air quality
  - CC5 Waste
- 5.2 This section focusses on the progress we are making with delivering the aims and objectives set out in the Local Plan in relation to sustainability and climate change. It monitors progress in relation to eight key indicators, which are set out below.

### Sustainability and Climate Change Indicator 1

**Achieve BREEAM Excellent** on all non-residential development of 500sqm or more floorspace.

- 5.3 The Council requires all schemes to consider sustainable development principles from the start of the design process. BREEAM - Building Research Establishment Environmental Assessment Method) is a tool that enables us to assess the environmental sustainability of a development. Development can be awarded the following ratings of pass, good, very good, excellent, and outstanding.
- 5.4 Table 23 shows the number of major non-residential schemes requiring BREEAM certification and the rating awarded over the monitoring period. This data is difficult to obtain for all schemes within the policy threshold and as such, Table 24 reports the on major developments which is 10 or more homes, or 1,000sqm or more floorspace.

**Table 23 – Number of non-residential schemes requiring BREEAM assessment and rating awarded**

Monitoring year	Pass	Good	Very good	Excellent	Outstanding	Total
2021/22	-	-	2	3	-	5
2022/23	-	-	-	4	-	4

## Sustainability and Climate Change Indicator 2

Development of 10 or more homes, or 1,000sqm, to achieve 35% reduction in carbon emissions below Part L Building Regulations.

- 5.5 Any new development in Camden has the potential to increase carbon dioxide emissions in the borough.
- 5.6 The London Plan 2021 requires all major development in London to be net zero carbon. Indicator 2 reflects London Plan policy SI2 'Minimising greenhouse gas emissions' for a minimum on-site reduction of 35% beyond Building Regulations.
- 5.7 On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021. The London Plan Energy Assessment Guidance explains how the policy should be applied now that the updated Building Regulations have taken effect. This means that on-site reductions of at least 35% must be achieved beyond the updated Building Regulations Part L 2021. The guidance expects major residential development to be able to achieve a 50% improvement. (Please note that some applications recorded in 2021/22 would have been assessed under Building Regulations Part L 2014).
- 5.8 Table 24 below shows the expected on-site carbon reduction against Part L of the Building Regulations for residential and non-residential schemes approved over the monitoring period.

**Table 24 – Carbon reduction from approved schemes against Part L Building Regulations**

	Residential (major)		Non-residential (major)	
	2021/22	2022/23	2021/22	2022/23
<b>55% or more</b>	6	1	2	1
<b>45 – 54%</b>	2	2	4	0
<b>35 – 44%</b>	1	3	5	4
<b>25 – 34%</b>	0	0	0	1
<b>Below 25%</b>	0	0	1	0
<b>Total</b>	9	6	12	6

### Sustainability and Climate Change Indicator 3

Development of 5 or more homes, or 500 square metres or more, to achieve 20% reduction in carbon emissions from **on-site renewables**.

- 5.9 The Local Plan requires all developments involving five or more dwellings or that are 500 square metres or more of (gross internal) any floorspace to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO<sub>2</sub> reduction. Applications also need to include details of on-site renewables, targeting a 20% reduction where it is feasible.
- 5.10 Table 25 below shows the number of schemes, over the monitoring period, achieving an on-site carbon reduction through renewable energy generation. This data is difficult to obtain for all schemes within the policy threshold. As such, Table 25 reports the percentage reduction from renewable energy generation of major developments which is 10 or more homes, or 1,000sqm or more floorspace.

**Table 25 – On site carbon reduction through renewable energy generation – Residential and non-residential (major)**

	2021/22 number of approved schemes	2022/23 number of approved schemes
<b>20% or more</b>	11	8
<b>10 - 20%</b>	1	1
<b>5 - 10%</b>	0	0
<b>Below 5%</b>	0	0
<b>Total</b>	12	9

### Sustainability and Climate Change Indicator 4

Reduction in the level of air pollutants identified in the National Air Quality Strategy.

- 5.11 An Air Quality Management Area (AQMA) has been established across the borough in response to the air quality in the borough failing to meet the Government's objectives for nitrogen dioxide (NO<sub>2</sub>) and fine particles (PM<sub>10</sub>). Exposure to fine particles is associated with a range of health impacts, including cardiovascular and respiratory diseases, and the PM<sub>2.5</sub> component (fine particulate matter) is classed as carcinogenic.

- 5.12 Camden has committed to achieving the revised World Health Organization air quality guidelines (see [Camden Clean Air Strategy](#)) in response to scientific evidence about the impact of air pollution on health. The [Camden Clean Air Action Plan](#) contains Clean Air Outcomes which describe specific short and medium term interventions to improve air quality and protect public health in the borough.
- 5.13 Further information and data on air quality in the borough can be found in Camden Air Quality Annual Status Report, [available here](#). It is anticipated that data for 2023 will be reported later in 2024.

#### **Sustainability and Climate Change Indicator 5**

No net loss of open space.

- 5.14 Local Plan policy A2 'Open space' seeks to protect all public and private designated open space unless equivalent or better provision, in terms of quality and quantity, is provided within the local area. In addition to Camden's Local Plan open space designations, communities can protect open space through designating 'local green spaces' in a neighbourhood plan.
- 5.15 Designated open spaces and local green space can be viewed on [Camden Policies Map](#).
- 5.16 There has been no recorded loss of designated open space over the monitoring period. In terms of the provision of new open space, the following applications were approved over the monitoring period, which once completed will provide new open space / play space –
- The re-development of Acorn House, Gray's Inn Road (2020/3880/P)
  - The re-development of the 'Ugly Brown Building', 2 St Pancras Way (2021/2671/P)

#### **Sustainability and Climate Change Indicator 6**

No net loss in area and populations of biodiversity.

- 5.17 Natural habitats and species are protected by Local Plan policy A3: Biodiversity. This includes protection of the Hampstead Heath Woods Site of Special Scientific Interest (SSSI), Camden's only SSSI and 36 Sites of Importance for Nature Conservation (SINC), which are graded into four categories according to spatial significance and quality. Camden also has 4 'Local Nature Reserves' which host a variety of flora and fauna and provide opportunities for local communities to access and engage with nature.

- 5.18 Over the monitoring period, there were no changes in the extent of designated wildlife sites in the Borough.
- 5.19 We have since undertaken a review of the borough's SINC's to inform the preparation of the draft Local Plan '[Review of sites of importance for nature conservation](#)'. Prior to the review there were 36 SINC's within the LB Camden. These comprised 3 Metropolitan sites, 8 Borough Grade I sites, 9 Borough Grade II sites, and 16 Local sites). Only one site has changed status, a Local SINC St James's Garden, deleted, which has been entirely lost to a High Speed 2 (HS2) construction site.
- 5.20 The Council's [biodiversity strategy](#) (2022) also contains measures to deliver biodiversity gains, and should be used to inform planning proposals

#### **Sustainability and Climate Change Indicator 7**

Safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site.

- 5.21 Camden has one waste management facility at Regis Road which is safeguarded under Local Plan Policy CC5 Waste and the [North London Waste Plan](#). This is a civic amenity site, a recycling and reuse centre accepting both household waste and recyclable materials.
- 5.22 No new waste management facilities were permitted or constructed in Camden over the monitoring period.

#### **Sustainability and Climate Change Indicator 8**

Reduce the amount of waste produced. Recycle and compost 50% of household waste by 2020 and aspire to achieve 60% by 2031.

- 5.23 Camden Local Plan policy CC5 Waste seeks to make Camden a low waste borough and aims to reduce waste and increase recycling to meet London Plan targets. These targets have changed following the adoption of the London Plan 2021, which seeks to achieve a 65% waste recycling target by 2030.
- 5.24 The total local authority collected waste for Camden in the reporting period is set out in Table 26 below. There is no published data at this time for monitoring year 2022/23.

**Table 26 – Household collected waste**

<b>Monitoring Year</b>	Total Local Authority collected waste (tonnes)	House -hold total waste (tonnes)	House -hold waste sent to recycling, composting, or reuse (tonnes)	House -hold waste not sent to recycling, composting, or reuse (tonnes)	% house -hold waste recycled	Non house -hold total waste (tonnes)	Non house –hold waste sent to recycling, composting, or reuse (tonnes)	% of non house -hold waste recycled
<b>2021/22</b>	88,277	63,000	17,679	45,322	28%	26,280	4098	16%

## Chapter 6: Transport

- 6.1 The [Camden Local Plan 2017](#) aims to promote sustainable travel choices with development prioritising the needs of pedestrians and cyclists. The Plan includes the following relevant policies:
- T1 Prioritising walking, cycling and public transport
  - T2 Parking and car free development
  - T3 Transport infrastructure
  - T4 Sustainable movement of goods and materials
- 6.2 This section focusses on the progress we are making with delivering the aims and objectives set out in the Local Plan in relation to Transport. It monitors progress in relation to two key indicators, which are set out below.

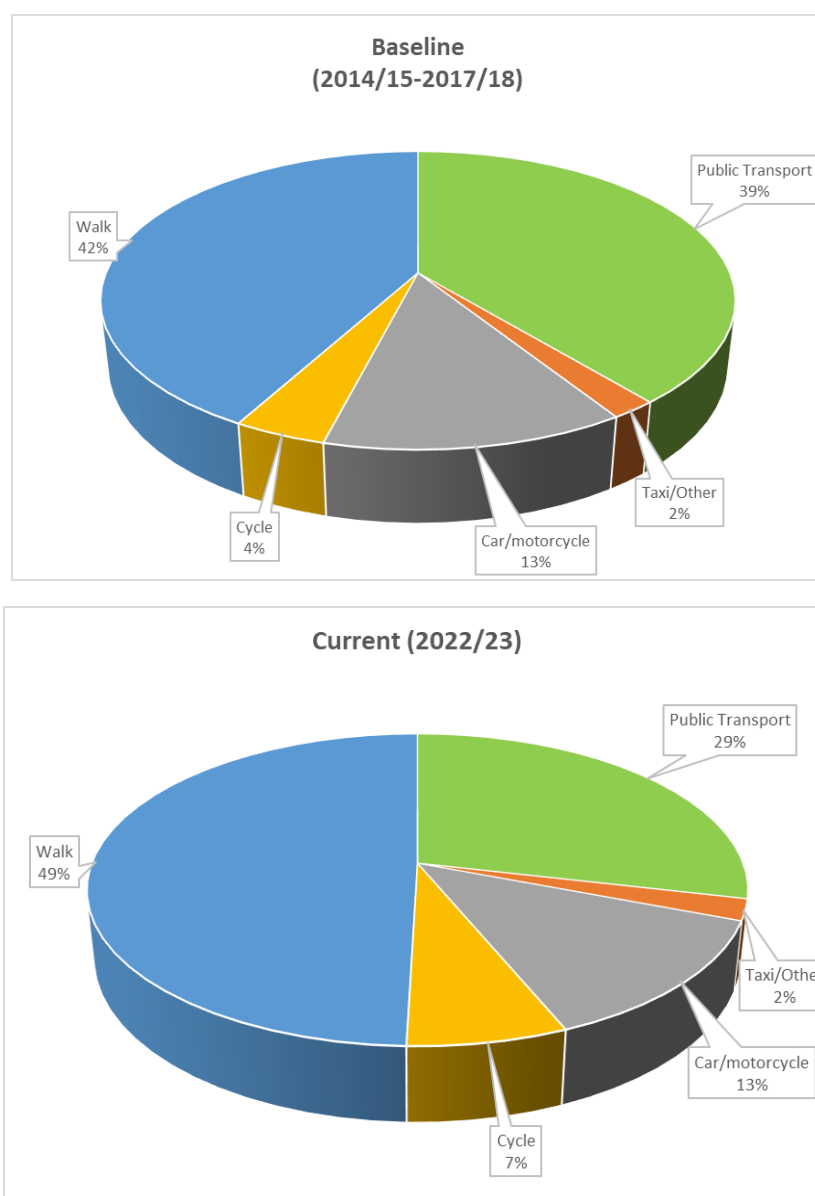
### Transport Indicator 1

To promote sustainable transport for all and to make Camden a better place to cycle and walk around by:

- More than double cycling's proportion of total traffic flows from 9.7% in 2009/10 to 25% in 2019/20; and
- Reducing motor vehicle traffic.

- 6.3 Through the policies in the Local Plan, the Council aims to prioritise sustainable forms of transport such as walking and cycling and minimise the use of motor vehicles.
- 6.4 The [Camden Transport Strategy Annual Update 2023](#) summarises progress and challenges in delivering the Transport Strategy in the calendar year. Figure 4 below shows transport mode data for Camden. The charts show that travel by car or motorcycle has stayed the same but the proportion walking and cycling has increased. The Annual Update states that further measures are therefore required to encourage and enable further shift from inessential motor vehicle trips in the Borough to healthier, more sustainable forms of transport.

**Figure 4 - Transport mode data**



- 6.5 The Council is also working to deliver a number of Healthy Streets projects in the borough, to make our streets safer for everyone. More information about the projects the Council's Transport Team are delivering can be found on our website [Making travel safer in Camden - Camden Council](#)



## Transport Indicator 2

Increase the total number of bicycle parking spaces agreed for new developments.

- 6.6 To promote sustainable transport options and encourage cycling in the borough, the Council will seek to ensure that new developments provide accessible, secure cycle parking facilities, exceeding the minimum standards outlined within the London Plan and design requirements outlined within our supplementary planning guidance.
- 6.7 Cycle parking spaces are either provided on-site or a development has provided a financial contribution towards cycle parking in the borough. Table 27 below shows the number of cycle parking spaces secured on site or through financial contribution.

**Table 27 - Number of cycle parking spaces secured**

	<b>Total</b>	<b>Visitor / Public (Sheffield stands)</b>	<b>Long stay (Cycle hangers)</b>
2019/20	854	153	701
2020/21	2,172	585	1,587
2021/22	2,309	418	1,891
2022/23	2,068	429	1,639

## Chapter 7: Heritage

- 7.1 The [Camden Local Plan 2017](#) aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. The Plan includes the following relevant policies:
- D1 Design
  - D2 Heritage
  - D3 Shopfronts

- 7.2 This section focusses on the progress we are making with delivering the aims and objectives set out in the Local Plan in relation to Heritage. It monitors progress in relation to one key indicator, set out below.

### Heritage Indicator 1

Remove at least 5% of total number of Buildings at Risk in Camden from the Register annually.

- 7.3 'Heritage at Risk' is listed buildings and structures that are in a poor condition and often vacant. They need repair and if vacant need to be put to a suitable use. The nationwide register of heritage at risk is maintained and published annually by Historic England, with a separate volume published covering London only.
- 7.4 Camden currently has 16 building and structure entries and 14 places of worship entries on the register.
- 7.5 In 2022, no entries in the borough were removed from the register as a result of repairs, or buildings being brought back into use, and no buildings / structures were added.
- 7.6 In 2023, one entry, The Elms (formerly Elm Lodge), Fitzroy Park N6 was removed from the register as a result of repairs, or buildings being brought back into use, and no buildings / structures were added.
- 7.7 The Heritage at Risk Register for London is available to view here - [Historic England - Heritage at Risk Register 2023, London and South East](#)

## Chapter 8: Basements

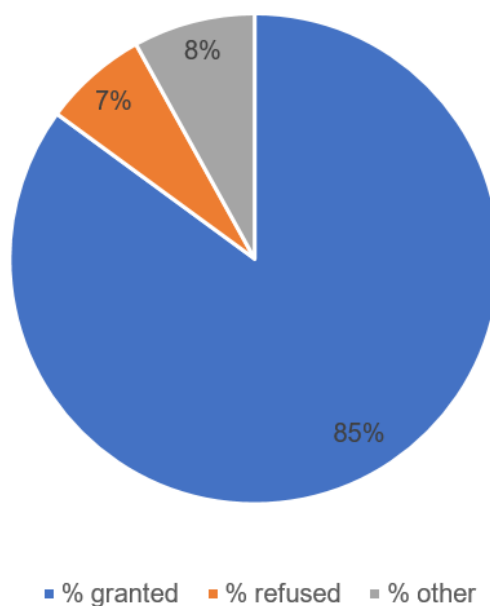
- 8.1 The [Camden Local Plan 2017](#) aims to ensure schemes for basement development in the borough do not cause harm to the amenity of neighbours and do not cause ground instability or flooding. The Plan includes a specific policy on basements – A5 ‘Basements’.
- 8.2 This section focusses on the progress we are making with delivering the aims and objectives set out in the Local Plan in relation to Basements. It monitors progress in relation to one key indicator, set out below.

### Basements Indicator 1

Ensuring that development incorporating the excavation of basements and lightwells addresses impacts on local drainage and run-off.

- 8.3 In determining proposals for basements and other underground development, the Council requires an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment. This requires applicants to submit information to demonstrate that proposed basement schemes will not harm the built and natural environment or local amenity.
- 8.4 The percentage of basement applications approved or refused in the borough over the monitoring period is shown Figure 5 below – which works out as 137 of 162 applications.

**Figure 5 - Basement planning applications decided 2021/22 to 2022/23**



- 8.5 Sustainable urban Drainage Systems (SuDS) are low environmental impact approaches to drain away dirty and surface water run-off through collection, storage, and cleaning before slow release back into the environment. They are intended to prevent flooding, pollution, and contamination of groundwater.
- 8.6 The [Sustainable Drainage Systems in planning applications](#) webpage provides further information on policy requirements and advice on drainage

## Chapter 9: Infrastructure Delivery

### Infrastructure needs and progress

- 9.1 Local Plan policy G1 'Delivery and location of growth' sets out how the Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet identified needs. In facilitating growth, in appropriate locations, and harnessing benefits from growth it is expected to secure the infrastructure and services to meet the needs of our growing number of residents, workers and visitors.
- 9.2 Appendix 1 of the Local Plan 2017 identifies a range of infrastructure required to support the delivery of the development identified in the Plan. As part of the review of the Local Plan we have updated the infrastructure delivery table in the Plan to reflect our updated priorities - [see Appendix 1 – Infrastructure schedule](#).

### Community Infrastructure Levy

- 9.3 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
- 9.4 The Camden CIL is spent as follows:
- 70 per cent on strategic projects across Camden
  - 25 per cent on local projects
  - 5 per cent on administration costs
- 9.5 The [Infrastructure Funding Statement 2021/22](#) report looks at income and expenditure from the Community Infrastructure Levy (CIL) and Section 106 (s106) agreements in Camden for the financial year and gives an indication of future spending priorities.
- 9.6 [A CIL and Section 106 Annual Report](#) is published every year. It summarises annual income and expenditure for the last financial year. It also gives details of proposed future spending of Section 106 funds.

### Planning obligations

- 9.7 A Planning Obligation is a legal charge on land which aims to mitigate the impact of development. It is also known as a Section 106 or S106 Agreement (Town and Country Planning Act 1990).
- 9.8 Table 28 below shows the total amount of money collected under any planning obligation which was received and spent during the reported year. Further information on the expenditure of S106 contributions [is available here](#).

**Table 28 - S106 Financial Activity**

<b>S106 Financial activity</b>		
<b>Monitoring year</b>	<b>Total amount of money under any planning obligation received in monitoring year</b>	<b>Total amount of money under any planning obligation which was spent by the authority</b>
2019/20	£9,317,358	£3,132,745
2020/21	£2,995,471	£14,683,364
2021/22	£9,489,387	£30,317,653



## Appendix 3

### CAMDEN HOUSING EXPENDITURE

---



## Appendix 3

### CGY S73 Application

### MHCLG Outturn (RO) 2023-24: Revenue Outturn Summary (RS) data Housing Services

A	B	C	D	E	F	M
						490
						Housing services (GFRA only)
E-code ▾	ONS Code ▾	Local authority ▾	Notes ▾	Class ▾	Detailed Class ▾	▾
Eng	E92000001	ENGLAND				2,801,246
E5022	E09000033	Westminster		LB	London	86,819
E4203	E08000003	Manchester		MD	MD	71,283
E5017	E09000022	Lambeth		LB	London	61,490
E5045	E09000025	Newham		LB	London	61,251
E5033	E09000005	Brent		LB	London	57,733
E5018	E09000023	Lewisham		LB	London	45,678
E5046	E09000026	Redbridge		LB	London	41,048
E5037	E09000010	Enfield		LB	London	40,384
E5011	E09000007	Camden		LB	London	40,308
E5035	E09000008	Croydon		LB	London	40,287
E5016	E09000020	Kensington & Chelsea		LB	London	39,267
E0801	E06000052	Cornwall UA		UA	UA	37,773
E5013	E09000012	Hackney		LB	London	37,459
E5036	E09000009	Ealing		LB	London	34,799
E4302	E08000012	Liverpool		MD	MD	34,536
E5019	E09000028	Southwark		LB	London	33,597
E1401	E06000043	Brighton & Hove UA		UA	UA	31,502
E5021	E09000032	Wandsworth		LB	London	30,975
E5034	E09000006	Bromley		LB	London	30,346
E5012	E09000011	Greenwich		LB	London	28,231
E0102	E06000023	Bristol UA		UA	UA	26,347
E5049	E09000031	Waltham Forest		LB	London	25,970
E3301	E06000066	Somerset		UA	UA	25,588
E5015	E09000019	Islington		LB	London	24,929
E5014	E09000013	Hammersmith & Fulham		LB	London	24,301
E3001	E06000018	Nottingham City UA		UA	UA	23,975
E5038	E09000014	Haringey		LB	London	23,911
E4404	E08000019	Sheffield		MD	MD	23,346
E5020	E09000030	Tower Hamlets		LB	London	22,609
E0401	E06000042	Milton Keynes UA		UA	UA	21,008
E1302	E06000047	Durham UA		UA	UA	20,453
E4704	E08000035	Leeds		MD	MD	20,038
F0402	F06000060	Ruckinghamshire UA		UA	UA	19,654





## Appendix 4

### HOUSEHOLDS IN TEMPORARY ACCOMMODATION (2023)

---



## Appendix 4

### CGY S73 APPLICATION

### MHCLG OUTTURN (RO) 2023-24: REVENUE OUTTURN SUMMARY (RS) DATA

### HOUSEHOLDS IN TEMPORARY ACCOMMODATION

Table TA1 - Number of households by type of temporary accommodation provided England, 31 Decmber 2023							
		Total number of households in TA <sup>1,2,3,4</sup>	Number of households in area <sup>5</sup> (000s)	Total number of households in TA per (000s)	Total number of households in TA with children	Total number of children in TA	
E92000001	ENGLAND	112,610	23,970	4.70	71,270	145,780	
E12000007	London	63,200	3,630	17.41	42,860	84,920	
-	Rest of England	49,410	20,340	2.43	28,410	60,850	
E12000001	North East	940	1,190	0.79	280	590	
E12000002	North West	7,740	3,210	2.41	4,290	9,170	
E12000003	Yorkshire and The Humber	3,080	2,370	1.30	1,250	2,680	
E12000004	East Midlands	3,400	2,090	1.63	1,970	4,170	
E12000005	West Midlands	7,390	2,500	2.96	5,670	13,310	
E12000006	East of England	8,100	2,650	3.05	4,890	10,430	
E12000007	London	63,200	3,630	17.41	42,860	84,920	
E12000008	South East	13,510	3,890	3.48	7,500	14,960	
E12000009	South West	5,250	2,440	2.15	2,550	5,530	
E09000007	Camden	683	118	5.80	361	654	



## Appendix 5

### **CABINET REPORT FOR BETTER HOMES (14<sup>TH</sup> OCTOBER 2024)**

---

<b>LONDON BOROUGH OF CAMDEN</b>	<b>WARDS:</b> All
<b>REPORT TITLE</b> Themed Debate – Private Rented Sector	
<b>REPORT OF</b> Cabinet Member for Better Homes	
<b>FOR SUBMISSION TO</b> Council	<b>DATE</b> 14 <sup>th</sup> October 2024
<b>SUMMARY OF REPORT</b>  This report provides background information to Full Council for a themed debate on the private rented sector in Camden to be held on 14 October 2024. The report covers existing challenges for this important sector including current support for tenants and landlords.  <b>Local Government Act 1972 – Access to Information</b>  No documents that require listing have been used in the preparation of this report.  <b>Contact Officer:</b> Darren Wilsher, Private Sector Housing Service Manager, London Borough of Camden, 020 79742797, 5 Pancras Square N1C 4AG  Simone Melia, Head of Housing Solutions, London Borough of Camden, <a href="mailto:simone.melia@camden.gov.uk">simone.melia@camden.gov.uk</a> , 5 Pancras Square N1C 4AG	
<b>RECOMMENDATIONS</b> The Council is asked to consider the report.	

Signed:



Councillor Sagal Abdi-Wali, Cabinet Member for Better Homes

## 1. Background

- 1.1. The proportion of Camden residents renting in the private rented sector has grown significantly over the last 20 years, increasing by a third to 36%. The sector plays a crucial role in delivering housing in the borough, which has been driven by several factors:
  - **Unaffordability:** Property prices in Camden have increased by 73% in the last 15 years. A combination of high property prices and tight mortgage regulations have made home ownership less accessible, leading more people to rent.
  - **Urban Appeal:** Camden's vibrant cultural scene and excellent transport links attract a diverse range of residents, including professionals, students, and key workers.
- 1.2. Through We Make Camden, the Council has outlined its ambition that everyone should have a place they call home. In particular, that Camden has enough decent, safe, warm and family-friendly housing to support our communities. However increasing house prices, a limited supply of social housing and the high costs of renting in the private sector present significant challenge.
- 1.3. The pandemic highlighted the importance of housing on nearly every aspect of people's lives. Many people had to use their home to work, study, exercise, socialise and build a family. The Government introduced temporary protections for tenants to prevent evictions and landlords via mortgage payment holidays and funding was also provided to local authorities to support residents with cost of living challenges due to the pandemic.
- 1.4. Temporary protections for private renters have since been lifted and there have been dramatic changes to the sector since Covid, in part triggered by a rapid increase in inflation and resultant hikes in mortgage rates. During 2023, 76% of buy-to-let landlords reported that they increased their rental prices to offset higher mortgage costs. With mortgage rates remaining high, many landlords have advised that they are likely to need to increase rates when they re-mortgage, impacting further on renters facing some of the most expensive housing in the UK.
- 1.5. The shortage of decent and affordable housing of all types and tenure is forcing people to move out of Camden, with many people who've grown up here unable to afford to stay when they want to start a family. Monthly rents in the private rented sector in Camden are the third highest in the country, with private renters in Camden paying 65% of the median pay on rent.
- 1.6. Since 2021, the number of homelessness approaches to the Council has more than doubled, an increase that has been seen across London. Historically,

Camden and other local authorities have relied on the private rented sector to provide options for households experiencing homelessness but the huge increase in rents in recent years has made this much more difficult. In 2022-23 only 2.3% of rental listings across London are affordable to those on the London Housing Allowance (down from 18.9% in 2020/21) and there are none in Camden.

- 1.7. This has led to an increasing number of households joining the waiting list for social housing and placed in temporary accommodation for longer periods. This is both costly for the Council but also has a negative impact on those experiencing insecure accommodation for longer, especially children. While the Council has had some success increasing the number of properties available for Temporary Accommodation, there are very few options for many of these households.
- 1.8. Private renters do not just face high costs, the standard of accommodation can also be poor. While most landlords provide good quality and well managed accommodation, there continues to be a minority of criminal landlords seeking to exploit vulnerable residents with substandard accommodation.
- 1.9. There are also other barriers to securing rental contracts. Prospective renters may need a guarantor who agrees to pay rent in the event they are unable to, will need to pay a deposit and in some cases required to pay one months rent in advance. Tenancies are often advertised on a short-term basis (for example, 6-12 months) and landlords routinely reject benefit claimants as tenants.
- 1.10. The new government made a commitment to introduce a new Renters' Rights Bill in the 2024 King's Speech which will end Section 21 'no fault' evictions as well as aim to improve standards in the sector, including through strengthened powers for local authorities. In principle, we welcome the ambition of the legislation but will be closely following what impact it will have on the private rented sector in Camden as more detail becomes clear.
- 1.11. High-quality, affordable private rented sector accommodation is fundamental to resolving the housing crisis and tackling the rising levels of homelessness. As a Council we want to work with high quality landlords to ensure this remains a route out of homelessness for those in Camden. We will be consulting on a new Homelessness and Rough Sleeping Strategy at the end of 2024 which will set out how we plan on responding to the crisis, alongside our ambitions for wider system reform.

## **2. Key data – the private rented sector in numbers**

## **2.2. Housing affordability**

- 2.3. Housing affordability in Camden is amongst the lowest in the UK. Monthly rents in the private rented sector are the third highest in the country, with private rents increasing by £200 (11%) since last year. In 2023, median monthly rents were £1,950, which is £450 higher than the London median (£1,500) and more than twice the England median of £825. Nationally, nearly one in ten private renters in receipt of housing support/benefits had been refused a tenancy in the last 12 months (English Housing Survey 2022/23).

## **2.4. Homelessness**

- 2.5. The number of homelessness approaches in Camden have increased dramatically over the last few years. In Camden, this has partly been driven by the ineffective Home Office system for accommodation and processing asylum seekers in the UK as fast track asylum decisions for those living in contingency hotels have led to those granted Indefinite Leave to Remain given insufficient notice to leave their Home Office accommodation and therefore engage with Council interventions effectively. There are approximately 17,000 asylum seekers in contingency accommodation across London.
- 2.6. If a household is in “priority need” for accommodation (for instance if they include children or vulnerable adults), are eligible for assistance and can demonstrate a “local connection” to Camden, the Council has a legal duty to provide temporary accommodation. As of 1 October 2024, there are 968 households in temporary accommodation in Camden. Historically, the Council has relied on the private rented sector to discharge our homelessness duty and have been effective at preventing homelessness this way. However, the reduction of the market in London, combined with increasing rents, limits on the level of Local Housing Allowance and the impact of the benefit cap mean that this has become increasingly difficult.
- 2.7. In 2023/24, we were able to end our housing duty by securing accommodation in the private rented sector for 139 households and accommodation in social housing for 76 households. Historically we have been able to prevent more homelessness with moves into the private rented sector, finding 207 in 2019/20, 292 in 2020/21 and 180 in 2021/22.

## **2.8. Housing Standards**

- 2.9. Private renters are more likely than any other tenure to live in a poor-quality home. The Private Sector Housing Service receives on average 750 complaints a year

from private renters concerning their home, which is a small percentage of the 35,000 households in this sector. The small numbers are due to a mixture of challenges from lack of awareness of the support that Camden can provide, to a reluctance to report issues because of concerns around retaliatory eviction from landlords.

- 2.10. There are various indicators that are used to measure the standards of accommodation being provided. A key measure is whether properties, when assessed using the Housing Health and Safety Rating scheme, have any hazards that will impact on the health and safety of the occupiers. There are 29 categories of hazard ranging from damp and mould, excess cold, overcrowding and fire. As a local authority we have a statutory duty to ensure that any category 1 hazards found are removed, with a category 1 hazard presenting a serious and immediate risk to a person's health and safety. Within Camden, 10% of private rented properties have at least one category 1 hazard (compared to 5.9% across all tenures).
- 2.11. A broader regulatory standard for housing is the Decent Homes Standard which is likely to become legally enforceable for the private rented sector for the first time through the Renters' Rights Bill, currently working its way through Parliament. In Camden 22.4% of private rented sector accommodation is non-decent (compared to London 20% and 22.9% across England). Private renters are also more likely to be living in a damp home (10%).
- 2.12. Private rented households in the London are more likely to be overcrowded than the rest of England, with 9% of households being overcrowded, compared to 4% to 6% across the rest of England.
- 2.13. There are just under 5,000 Houses in Multiple Occupation (HMOs) that are licensed or going through the process to be licensed in Camden, out of an estimated 8,000 in the Borough. Licensing has been in place for the majority of HMOs since 2015 and is seen to be having a positive impact on improving property and management standards. Although, there is still more work to be done to improve this important sector.

### **3. Council's offer and support to stakeholders in the private rented sector**

#### **3.1. Private Sector Housing Service**

- 3.2. The Private Sector Housing Service is responsible for the Council's statutory duty to improve sub-standard housing within the private rented sector, delivered via a combination of proactive and reactive interventions. Around 750 complaints are



received a year, which are investigated by the Enforcement Team. The majority of these cases are resolved informally by working with the landlord and tenant. However, 10% of cases require formal enforcement action be taken, whether by the service of an Improvement Notice, prosecution or issuing a Civil Penalty Notice. During 2023/24, 124 properties were improved by the reactive service, removing 150 hazards within the home.

- 3.3. Camden makes full use of the range of enforcement tools available and was the first London authority to obtain a Banning Order against a landlord as well as securing an anti-social behaviour injunction against a landlord to protect tenants from illegal eviction and harassment. Camden has consistently recorded the most enforcement action on the GLA's Rogue Landlord Checker, with 50% of other London local authorities not recording any enforcement. Over the last year the service issued 186 Civil Penalty Notices against landlords, an alternative to prosecution action, for a range of breaches from failing to licence or comply with management regulations.
- 3.4. Proactive improvement is primarily achieved by the operation of the Council's HMO licensing schemes. Two schemes are in operation, the largest being the discretionary borough-wide additional scheme covering smaller HMOs. Following the initial inspection, 99% of properties required works to be completed to meet minimum standards.
- 3.5. A key challenge is the ability to resource the service fully due to a national shortage of qualified/experienced Environmental Health Officers. This is frustrating the services ability to increase resources to support HMO licensing and enforcement work. To address this critical issue, we have developed a strategy of building our own enforcement officers by supporting successful candidates to complete a new 1-year Diploma in Private Sector Housing Interventions at Middlesex University. Four candidates have now successfully completed the course, with a further three about to start studies in September 2024. The course is part-time, with the remainder of the week working in our teams, gaining practical experience and knowledge to support their studies.
- 3.6. The service is funding Trading Standards Officer positions to undertake enforcement activities around consumer protection aspects of the private rented sector. Recent activity has been focused on managing agents and compliance with requirements around tenant fees, client money protection, redress schemes and consumer rights.
- 3.7. The council has recently commenced working with Safer Renting to enhance the support available to tenants facing illegal eviction and harassment. This provides a more holistic approach to our enforcement activities, ensuring that tenants get

advice when reporting issues with their landlords, alleviating concerns around retaliatory eviction.

### **3.8. Homelessness Prevention Service**

3.9. The service carries out the Council's statutory duty to assess anyone who is homeless or at risk of homelessness. If they're threatened with homelessness and eligible then we have a legal duty to provide homelessness advice and support such as help to find private rented accommodation. If they are also in "priority need" for accommodation, which includes families and vulnerable single people, we then have a legal duty to provide temporary accommodation. We discharge duties through a suitable offer of accommodation or if someone refuses suitable offers of accommodation.

3.10. When supporting homeless households into the private rented sector, we pay the upfront cost of renting to the landlord (in the form of an incentive payment, in place of a deposit and rent in advance) and ensure the tenancies are set at a rent that is affordable (a requirement of discharging a housing duty). The tenant is then responsible for paying their rent to the landlord by income or benefits. We also provide tenancy training and floating support to ensure tenancies are sustainable.

3.11. We know that working in a preventative way has a higher success rate of preventing homelessness, but the change in market conditions and availability of options has made this difficult. The Local Housing Allowance rates in London do not match the market and it is increasingly difficult to procure property at Local Housing Allowance rates in London or to sustain tenancies at affordable rent levels in the current market.

### **3.12. Financial support**

3.13. While there are not specific funds available for private renters as group, those renting in the private rented sector and in urgent financial need are able to apply for financial support from the Council. For example, the Cost of Living Crisis Fund was launched in 2022 and anyone over 18 (or 16 if living independently) who meets the specified criteria can apply for a payment worth up to £500. Residents can apply through Money Advice Camden which can also support them in accessing other government benefits including the Housing Support Fund.

3.14. If private renters are receiving Housing Benefit or the Housing Costs element of Universal Credit but facing a shortfall (where their rent is higher than the benefit), they can apply for a Discretionary Housing Payment (DHP) which can cover the value of the shortfall for a certain period of time. This financial support can be

paid direct to the landlord to cover arrears, or be used by the tenant to cover moving costs, deposit or rent in advance for a new, more appropriate or affordable, property.

#### **4. Engagement with private sector renters**

- 4.1. When we surveyed private tenants in 2020, the results showed that 51% of participants were not aware the Council could help them. Only 26% felt confident about their rights as a tenant. 20% were very dissatisfied with their landlord, with the main issue being landlords too slow to fix a problem. Key issues reported were damp and mould (58%), heating and hot water (54%) and general maintenance (51%).
- 4.2. There are significant challenges with engaging effectively with private renters. In an attempt to address this, the [Camden Private Renters](#) website was launched in 2021. Its aim is to bring together a comprehensive range of guidance and support to inform and educate private renters in one place. Building on the new website and success of our landlord forums, the service ran two tenant forums in 2023 with disappointing levels of engagement despite attempting various communication channels to raise awareness.
- 4.3. We chair regular Private Rented Sector Partnership meetings, where external and internal stakeholders meet to discuss sector intelligence, legislation and upcoming promotional activities. Recent discussions have been around the Renters' Reform Bill and exploring methods to improve tenant engagement.

#### **5. Looking forward**

##### **5.1. Renters' Rights Bill**

The Renters' Rights Bill aims to change various aspects of the law concerning the private rented sector. The bill was presented to Parliament on 11 September 2024, with its second reading due on 9 October 2024. The Bill aims to introduce security, safety and fairness to renters, through the following proposals:

- **Abolish Section 21 'no-fault' evictions** and moving to a structure where all assured tenancies are periodic.
- **Ensure possession grounds are fair to both parties** to give tenants more security while ensuring landlords can recover their property when reasonable. This will include giving tenants more time to find a home if landlords evict to move in or sell.

- **Provide stronger protections against backdoor eviction** by ensuring tenants are able to appeal excessive above-market rents purely designed to force them out. An independent tribunal will make a judgement on this, if needed.
- **Introduce a new Private Rented Sector Landlord Ombudsman** that will provide quick, fair, impartial and binding resolution for tenants' complaints about their landlord.
- **Create a Private Rented Sector Database** to help landlords understand their legal obligations and demonstrate compliance, alongside providing better information to tenants to make informed decisions when entering a tenancy agreement. It will also help local councils target enforcement activity where it is needed most.
- **Give tenants strengthened rights to request a pet in the property.**
- **Apply the Decent Homes Standard to the private rented sector** to give renters safer, better value homes.
- **Apply 'Awaab's Law' to the sector**, setting clear legal expectations about the timeframes within which landlords in the private rented sector must take action to make homes safe.
- **Make it illegal for landlords and agents to discriminate against prospective tenants in receipt of benefits or with children.**
- **End the practice of rental bidding** by prohibiting landlords and agents from asking for or accepting offers above the advertised rent.
- **Strengthen local authority enforcement**, by expanding civil penalties, introducing a package of investigator powers and bringing in a requirement for local authorities to report on enforcement activity.
- **Strengthen rent payment orders** by extending them to superior landlords, doubling the maximum penalty and ensuring repeat offenders have to repay the maximum amount.

It is expected that the key aims of the Bill will come into force at some point, however, there is likely to be a staggered implementation for each element moving forward.

## 5.2. **Renewal of discretionary borough wide additional HMO licensing scheme**

The existing 5-year designation is due to end on 7 December 2025. Resources are now in place working on a review of the current scheme and proposals for a new designation to be implemented for a further 5-years. Initial indications reinforce that licensing is having a positive impact on improving standards, however, more work is required to ensure that properties are being brought up to and maintained to minimum standards moving forward.

## 5.3. **Tenant engagement**

The Private Sector Housing Service recognises that we need to rethink how we engage and support tenants living in private rented sector accommodation, for

example around issues like disrepair, living in an HMO, damp and mould, trading standards issues and the cost of living. We will develop proposals for ways to improve our levels of engagement and reach more tenants, learning from our experience with the tenant engagement forums in 2023.

#### **5.4. Homelessness**

The Council has been an active campaigner on homelessness issues in recent years, especially as the numbers presenting as homeless have increased so dramatically. The change of government presents an opportunity to address some of the barriers we currently face in meeting our homelessness obligations, especially in the private rented sector. Meeting the housing challenge is a top priority for the Council and we will be working on a range of asks to national government to increase the quantity and quality of housing, ensuring that everyone has a place to call home that is safe, warm and dry.

### **6. Legal Implications**

6.1. The Borough Solicitor has been consulted and has no comments to add.

### **7. Resource Implications**

7.1. The market failures in the private rented sector described in section 1 of this report result in a number of costs to the Council. The cost of the Council's statutory duties and discretionary activities to regulate the private rented sector are to some degree funded by licencing income and financial penalties, but there is still a net cost to the Council. There are a number of more indirect costs resulting from rubbish, anti-social behaviour, noise etc.

7.2. However the largest cost resulting from market failures are costs relating to the prevention, assessment and in particular the alleviation of homelessness. In common with many other local authorities, Camden had a considerable overspend on temporary accommodation in 2023/24, and is forecasting an even larger overspend in 2024/25. Recent changes in the private rented sector impact all parts of the homelessness system – the unaffordability of the PRS frustrates efforts to prevent homelessness, increases homelessness presentations, makes temporary accommodation more expensive and reduces the availability of settled accommodation into which the Council can discharge its homelessness duties.

### **8. Environmental Implications**

8.1. There are no specific environmental implications.

## **APPENDICES**

### **Appendix 1 – Private rented sector housing standards key data**



## Appendix 6

### GLA HOUSING AND LAND RESEARCH NOTE

---



Housing Research Note 10

## The affordability impacts of new housing supply: A summary of recent research



James Gleeson  
August 2023



## **Copyright**

**Greater London Authority  
August 2023**

Published by:  
Greater London Authority  
City Hall  
Kamal Chunchie Way  
London E16 1ZE

**[www.london.gov.uk](https://www.london.gov.uk)**

The cover image shows the locations of new developments around the Deptford area of London, using data from the London Datahub

Copies of this report are available from <https://data.london.gov.uk/housing/research-notes/>

Feedback on this report or suggestions for improvements are welcomed and should be sent to [housing.analysis@london.gov.uk](mailto:housing.analysis@london.gov.uk)

## **1. Executive summary**

- 1.1 This note summarises the findings of recent economic research into the impacts on affordability of new housing supply.
- 1.2 There is already evidence that increases in the supply of housing bear down on housing costs over the long term, but until recently there has been little evidence on the short-term and local impacts of new supply on affordability.
- 1.3 Several recently published economic papers attempt to identify these impacts using new data sources and new analytical techniques.
- 1.4 This research finds that in general, building new market-rate homes makes other housing more affordable. It does so by creating chains of vacancies and moves that can reach across an entire housing market area. These moving chains improve the availability and affordability of housing throughout the range of prices and rents, including for low-income households.
- 1.5 Building market-rate housing therefore indirectly increases the availability of homes affordable to low-income households, although not as directly as building social housing and other kinds of affordable housing.
- 1.6 The geographical distribution of market-rate housing supply matters. If it is focused only in low-income areas it can lead to localised increases in prices and rents in those areas (while still improving affordability elsewhere), if the impact on demand resulting from improvements in local amenities and services outweighs the impact on supply.

## **2. Introduction**

- 2.1 There is a broad consensus in the academic and policy literature that increases in the supply of new housing bear down on prices and rents over the *long term* and at *city or national level*, but considerable uncertainty over the *short-term* and *local* effects. Some of this controversy is due to a lack of good evidence, given the difficulty of separating out cause and effect when new construction can seem to coincide with rising prices, and when a host of other factors can affect prices and rents. For example, there are concerns that adding high-priced new homes into an area drives up costs for those nearby, or at least does little to improve the prospects of lower-income households.
- 2.2 Recent academic research from around the world aims to overcome these challenges by employing new techniques and exploiting new data sources. This paper summarises the new literature and relates these findings to a range of existing evidence.
- 2.3 The paper focuses on evidence of the impacts of new supply, rather than on the effects of different policies aimed at increasing supply. One recent overview of evidence (predominantly from the US) on the impacts of ‘zoning’ changes on supply is provided by [Freemark \(2023\)](#).

## **3. Existing evidence on the impacts of housing supply**

- 3.1 A large body of economic research comparing long-term changes in the housing stock with changes in house prices and rents, and controlling for a range of other causal factors, shows that increases in housing supply tend to reduce housing costs when all else is equal. Some of this research focuses on one country, while other studies (such as [Andrews 2010](#)) involve cross-country comparisons. The UK government’s official estimates of housing supply impacts (summarised in [MHCLG 2018](#)) are based on this kind

of analysis. According to those estimates, a 1% increase in the housing stock leads to a 2% fall in house prices *if nothing else changes*. The impact on private rents is thought to be similar. In practice, the effect of supply is offset by factors that increase demand such as population and income growth, and can be (and in the UK usually is) swamped by them so that housing costs rise over time.

- 3.2 Another substantial strand of research analyses the extent to which homes that were originally built for inhabitants with above-average incomes tend to ‘filter’ down to less affluent segments of the market over time. Recent research ([Liu et al 2022](#)) has established that filtering rates vary substantially from place to place, and that the process only operates as long as new housing supply is reasonably responsive to changes in demand. Where new supply does not increase enough in response to demand, the filtering process can go into reverse and homes that were previously occupied by low-income households are increasingly bought and rented by higher-income ones – a process that is often called ‘gentrification’. The vast majority of empirical research into filtering has focused on the US, with very little in the UK.
- 3.3 As well as its impact on prices, there is also evidence (see [Bramley et al 2010](#) and [Bramley 2019](#)) that additional housing supply enables demographic change through higher rates of household formation over the long term, thereby reducing the number of ‘concealed’ households, a major category of housing need (although this increased household formation will itself add to demand). Relatedly, research into the long-term decline of short-distance spatial mobility in Britain has suggested that the rising cost and constrained supply of housing may have led to people (particularly older people) making fewer short-distance housing moves in recent decades, and therefore contributed to a growing mismatch between what people want from their homes and what they have ([Shuttleworth et al, 2018](#)).
- 3.4 This existing evidence base has a number of limitations.
  - First, it focuses on *long-term changes* taking place over several years or even decades, partly because some of the mechanisms it describes (such as filtering) operate quite slowly over long spans of time, but largely because the available data and techniques only allow for estimating long-term effects. It therefore cannot tell us what the short-term impacts of housing supply are (if any), or much about how these translate into longer-term changes.
  - Secondly, research into short-term and local impacts of new housing supply has been dogged by the challenge of *identifying causation*, because new construction often appears to coincide with or even precede the changes in demand or neighbourhood conditions that may have prompted it, and because of simultaneous changes in other factors that can affect prices.
  - Finally, the pre-existing evidence base generally lacks a sufficiently fine-grained *spatial resolution* to be able to distinguish between hyper-local, local and regional effects of new supply. Given that new supply can have a transformative impact on its immediate surroundings but can also affect the housing market of a wide region, this lack of spatial distinction is a serious shortcoming.

## 4. Findings from recent research

### Techniques and data sources

- 4.1 The research summarised in this section use new techniques and new data to overcome the challenges mentioned above and to identify the causal impacts of new housing supply in the short term and in the local area.
- 4.2 The techniques employed include:
- Tracking the ‘chains’ of housing moves that are initiated when a household moves into a new dwelling, freeing up their existing home for someone else to move into, who frees up their home, and so on;
  - ‘Spatial difference-in-difference’ models, which assess whether places nearby to new housing developments experience different trends to places further away;
  - ‘Natural experiments’, which allow researchers to identify changes in the supply of new housing that aren’t driven by changes in demand.
- 4.3 The data used is generally much more detailed and precise than what was available to previous researchers, including data on specific newly constructed buildings, individual-level data on incomes and addresses, and longitudinal data that tracks household moves from one place to another. Some of this data comes from commercial sources, and some from official population registers. Due to the paucity of both kinds of data in the UK, most of this research comes from other countries – but generally from contexts that are comparable to the UK more broadly and to London in particular.
- 4.4 The research covered here comprises a selection of recent economic papers that robustly identify causal impacts of new housing supply. This is a rapidly developing field so the selection cannot claim to be exhaustive, but is intended to be representative of high-quality research in this area. Four of the seven papers have so far appeared in peer-reviewed journals. Selections have also previously been reviewed by [Phillips et al \(2021\)](#) and [Grein \(2022\)](#). The findings of the papers are described below and summarised at the end of this section.

Mast (2021), 'The effect of new market-rate housing construction on the low-income housing market' - [Journal of Urban Economics](#).

- 4.5 This research examines the impacts of new buildings with apartments to rent or buy in areas with above-average incomes in or near the centres of large US cities (including expensive cities with severe housing shortages, such as New York and San Francisco). It focuses on the chains of housing moves that are initiated by new construction, using individual address history data to identify 52,000 residents of these new buildings, their previous address, the current residents of *those* addresses, and so on for up to six ‘rounds’ of moves. Chains of moves come to an end (or are not created in the first place) when a new or vacant home is bought as a second home or is moved into by a newly forming household.
- 4.6 Mast finds that while most of those who move into the new apartment buildings from elsewhere in the same metropolitan area move from nearby high-income areas, 20% move from neighbourhoods with average incomes below the median level. But when each link in the chain of moves initiated by the new building is traced, 40% of the final round of moves are from areas with average incomes below the median for the metropolitan area. Mast estimates that a new market-rate building in a city centre that houses 100

households ultimately frees up between 45 and 70 homes in low-income neighbourhoods (of which 17 to 40 are in areas with very low incomes, i.e. in the bottom 20% for the metropolitan area), with most of these additional moves happening within three years.

- 4.7 It is important to note that this paper does not directly examine the impact of new supply on either prices or rents. Instead, by tracing the moves initiated by new supply it identifies the impacts on the *availability* of housing across a city, including in areas with very different income profiles. It finds that building new homes in one area can effectively increase the supply of housing in other areas, because new homes induce households to move and because most moves are relatively local. Whether there is any effect on prices or rents depends on whether the owners of homes freed up by moves need to drop their prices/rents to attract buyers/new tenants.
- 4.8 Another point to note is that not all new homes initiate a chain of moves, and some chains end quickly, because of purchases by second-home owners or moves by new households that do not free up an existing home. These effects do not increase the overall availability of housing, but they do avoid the reduction in availability that would occur if the same purchasers were to buy or rent homes elsewhere.

Asquith, Mast and Reed (2023), 'Local Effects of Large New Apartment Buildings in Low-Income Areas' – [Review of Economics and Statistics](#)

- 4.9 Like the previous paper, this one looks at the impacts of constructing new apartment buildings in the centres of large US cities (again, including high-cost cities with pronounced housing shortages). The key differences are that this time, the buildings are in central neighbourhoods with *below*-average incomes; that the analysis focuses on the construction of new apartments to rent and not to buy; and that it looks at the impact not just on migration but on rents in nearby buildings. The analysis focuses on the hyper-local impacts of individual new buildings, rather than aggregate impacts of new supply over an entire city or region.
- 4.10 Using a spatial difference-in-difference approach, the authors investigate the effects of new buildings (with a median size of 117 homes) on rents within a 250-metre radius, a distance that they argue is most likely to capture the impacts of both the additional supply from each individual building and any changes to demand (for example from any new amenities associated with the development). Each new building increases the stock of housing within that 250-metre radius by an average of 37%.
- 4.11 The authors find that the rents of existing dwellings within a 250-metre radius of new buildings fall by an average of 6% compared to those further away (between 250m and 600m). The effects are shown to persist for at least three years. Consistent with findings from Mast (2021), they find that the new development spurs increased in-migration from other neighbourhoods, particularly low-income areas.
- 4.12 These findings reinforce those of Mast (2021), but crucially they show that by freeing up nearby homes, new construction also tends to reduce rents in the immediate vicinity. Relevant to other papers reviewed below, they also found that “If buildings improve nearby amenities, the effect is not large enough to increase rents”. One caveat to note is that their rents data is more representative of the upper rather than the lower end of the market.

Bratu, Harjunen, Saarimaa (2023), 'City-wide effects of new housing supply: Evidence from moving chains' – [Journal of Urban Economics](#)

- 4.13 The two papers summarised so far focused on housing markets in large US cities. This next paper examines whether similar dynamics take place in the very different social and economic context of Helsinki. It also differs from the previous two studies in analysing the impact of both market-rate and social housing supply. Finally, whereas the previous two papers looked at the average incomes of the neighbourhoods that people in moving chains moved from, this paper is able to identify the incomes of specific individuals and households by using highly detailed population register data. The analytical approach is otherwise similar to Mast (2021), in that it tracks the moving chains initiated by the construction of new homes in relatively high-cost central areas but does not attempt to measure any further impacts on prices or rents.
- 4.14 Consistent with the previous two papers, the authors find that people moving into new market homes in the city centre tend to have above-average incomes, but the moving chains triggered by these new units free up homes in middle- and low-income neighbourhoods quite quickly (within one or two years). The size of the effects identified are broadly similar to those of Mast (2021): For every 100 new market-rate units built in central areas, around 66 are freed up within two years in neighbourhoods with below average incomes (of which around 31 were in areas with average incomes in the bottom 20%).
- 4.15 The chains of moves created by new social housing look different because lower-income households are much more likely to make the first moves into these homes, but by the end of the chains the effects of social housing in terms of freeing up homes in low-income areas look similar to those of market housing. In other words, because it is directly targeted at low-income households, social housing 'loosens' the housing market in low-income areas more quickly and more substantially than market-rate housing, although both forms of new supply are helpful in this regard. The local context may be important here: Helsinki has low rates of overcrowding and homelessness so households moving into new social housing units are likely to free up an existing home, but if many households moving into social housing are moving from overcrowded homes or hostels then fewer moving chains will be created.
- 4.16 Using the highly detailed data available to them, the authors also show that the moving chains initiated by new market-rate supply include low-income households, rather than just people with relatively high incomes moving out of low-income areas. This improves on the area-based results provided in the two previous papers.

Mense (2023), 'Secondary housing supply' – [Working paper](#)

- 4.17 Like the previous paper, this one examines a European rather than North American setting. Mense analyses the impacts on average market rents in German cities of new housebuilding, measuring aggregate rather than hyper-local impacts. He takes a novel approach to separating out cause and effect, using variation in weather conditions (heavy rain and deep frosts) which are shown to delay construction to predict changes in the availability of new homes that are not linked to changes in demand. He focuses on delays to the construction of single-family homes, because apartment construction is much less sensitive to weather conditions.
- 4.18 Using this approach, he finds that new construction initiates chains or 'cascades' of moves: each newly built home results in 4 to 5 additional properties being freed up in the second-hand rental market. This additional supply reduces rents at the city-wide level,

with a 1% increase in the flow of new homes lowering average rents by 0.2%. Crucially, he finds that new supply lowers rents in all market segments, including cheaper homes (though the impact is larger on more expensive homes). This is consistent with new supply at the high end improving availability at the low end through chains of moves. The impact is the same when the analysis is restricted to only those areas with above-average growth in demand.

- 4.19 Mense argues that the relatively quick and direct impact of high-end new supply on rents in the lower end of the market can be explained by the fact that many moves involve significant 'jumps' in housing quality and costs (something that Bratu et al also found). This in turn is due to the costs (both financial and non-financial) of moving being quite high: if they were not, moving between homes of similar quality and price would be much more frequent, and it would take a longer chain of moves for increases in high-end supply to reduce lower-end rents.

Pennington (2021), 'Does building new housing cause displacement? The supply and demand effects of construction in San Francisco' – [Working paper](#)

- 4.20 This paper looks at the effects on rents, displacement risks and local business turnover in San Francisco of new market-rate and affordable housing development. Like Mense, Pennington uses a 'natural experiment' to separate out cause and effect, but instead of looking at variations in supply caused by weather she looks at variation caused by serious building fires, which significantly increase the probability of additional housing being built on the parcel of land where the fire occurred. On average, developments on fire-affected parcels create 66 new homes, of which 20 count as affordable. Pennington combines fires and new construction with data on historic rents and an exceptionally detailed dataset on individual migration histories.
- 4.21 The headline finding is that rents fall by 1.2% to 2.3% within 500 metres of a market-rate housing development, and a smaller effect out to a radius of 1km. Pennington also estimates that the risk of households in the vicinity being displaced falls by 17% (eviction notices and moves to lower-income neighbourhoods are used to estimate rates of displacement). This finding suggests that relatively small changes in rents can be associated with relatively large changes in displacement risk.
- 4.22 Pennington also finds a 'hyperlocal' impact of new supply on demand: within 100 metres of development sites there is a 22% increase in nearby business turnover, and properties are significantly more likely to see richer residents moving in. But if these increases in demand tend to push up rents and prices, they appear to be outweighed by the increase in supply, and the net impact is to improve affordability.
- 4.23 Pennington finds that affordable housing development has no effect on nearby prices or rents. She does not analyse the reasons, but it is possible that even if new build affordable housing induces moves by low-income households, the effect on the overall balance of demand and supply in the market may not be large enough to affect rents (especially in a market as pressured as San Francisco). It may also be the case that those moving to affordable homes in the city are less likely to come from nearby or to free up another home when they move (due to having been a concealed household, for example). Pennington also notes that affordable housing directly reduces gentrification and displacement.

Li (2022), 'Do new housing units in your backyard raise your rents?' – [Journal of Economic Geography](#)

- 4.24 Li looks at the effects on nearby prices and rents of new high-rise buildings in New York City that had relatively high prices or rents compared to their local areas. To separate cause and effect she exploits the fact that construction completion timelines depend on a wide range of factors unrelated to demand, which introduces a quasi-random element to changes in new supply. She does not attempt to identify effects on rents or prices in the wider market beyond the immediate vicinity.
- 4.25 The headline finding is that a 10% increase in the housing stock leads to a persistent 1% fall in rents in the immediate vicinity (within 500 feet), and there is a similar effect on prices of increases in the supply of homes for sale. Within neighbourhoods, the downward impact is larger for high-end and mid-range existing rental buildings, because they are closer substitutes to new high-rises. Li notes that she cannot rule out some buildings taking longer to complete when the local housing market weakens, a phenomenon which would mean her headline finding is an under-estimate of the true effect.
- 4.26 Like Pennington, Li also identifies a positive demand effect: new high-rise buildings lead to new restaurants opening (and probably other business openings, although those are not measured). But, also like Pennington, she finds that the impact on prices and rents of these increases in demand are more than offset by the increases in supply.

Blanco and Neri (2023), 'Knocking it down and mixing it up: The impact of public housing regenerations' – [Working paper](#)

- 4.27 The papers already reviewed cover a wide range of locations and housing market contexts, from high-cost and high-inequality US cities like New York and San Francisco to the more affordable and egalitarian Helsinki. But only this paper by Blanco and Neri looks at a UK housing market setting, and it is a relatively specific one – estate regeneration projects in London that were approved between 2004 and 2018 and that replaced social housing with a mixture of market-rate and affordable housing.
- 4.28 Like Li and Pennington, Blanco and Neri look at the impacts on both nearby amenities (to identify any increases in demand) and the overall impacts on nearby prices and rents. They estimate that these developments significantly raise house prices and rents in the immediate vicinity (within a 100m ring), although house prices decrease farther away (between 200m and 500m), and the authors note that prices decreased overall, as there are relatively few homes in the immediate vicinity.
- 4.29 They find evidence of rents increasing up to 400m away, and no evidence of falling rents at any distance, although given the difficulty of distinguishing buildings that are part of the regeneration from those that are not, it is possible that some of the more expensive rentals identified in the vicinity are actually part of the overall scheme. A more fundamental point is that they estimate their effects from the point of planning approval, which is in advance of most of the works being started, let alone completed. Schemes take an average of one year to start and four years to complete, during which time tenants whose homes are being replaced may be re-located in the nearby area, potentially pushing up local rents on a temporary basis. If measured from the point of completion of the final unit in a scheme they find no effects of any kind on rents, which implies that all of the effect occurs during the (often lengthy) development period.
- 4.30 The key difference in the measured impacts from this study compared to other studies appears to be due to increases in demand outweighing the increase in supply: Blanco and Neri provide evidence of large improvements in nearby amenities as a result of estate



regenerations, including increased mentions of cafes and restaurants in property listings, and a substantial reduction in the number of recorded crime which they estimate accounts for a third of the change in house prices within 200m. In a [separate paper](#), Neri also finds an increase in local student achievement as a result of estate regenerations.

- 4.31 These amenity improvements are likely to significantly increase demand for the nearby second-hand stock, more than offsetting any increase in vacancies caused by the new building. Evidence that higher-income households are responding to these amenity improvements comes from increases in sales and listings of older properties near regenerated estates, in the number of second-hand homes advertised for rent after undergoing refurbishment, and in the number of local schoolchildren not eligible for free school meals.
- 4.32 While the number of schoolchildren not eligible for free school meals increases in areas of estate regeneration, the number of children who are eligible does not fall. Blanco and Neri interpret this finding as being consistent with estate regeneration not significantly decreasing the stock of social housing.
- 4.33 Blanco and Neri do not track any moving chains that may be initiated by the new homes built on estates, and do not attempt to estimate any impacts on prices or rents beyond a 1km radius. Their findings therefore do not contradict the message from the other papers reviewed here that new supply tends to increase the availability and lower the cost of housing across the housing market as a whole.

#### Summary of new research findings

- 4.34 Looking over these seven papers as a whole, a number of consistent findings emerge:
  - New housing supply tends to attract residents from the local housing market, initiating 'chains' of moves that allow multiple households to improve their housing situation for each new home provided.
  - While the initial moves into new-build market housing tend to be by high-income households, these moving chains increase the availability of low-cost as well as higher-cost homes across the housing market as a whole.
  - The supply impact of new homes tends to reduce nearby prices and rents but diminishes over distance.
  - New housing development can also lead to substantial improvements in amenities like local restaurants and even reductions in crime rates. These improvements, if large enough relative to the existing neighbourhood context, can generate enough increased demand for the second-hand housing stock in the area to outweigh the supply impact of new homes, and therefore push up prices and rents.
  - Put another way, new supply usually creates a net increase in the number of vacant properties in the area, putting downward pressure on prices, but in cases where new supply is accompanied by a significant improvement in amenities it could attract enough new demand to *lower* the vacancy rate, putting upward pressure on prices in the local area (while still lowering them elsewhere through chains of moves).

## **5. Relationships to other research**

- 5.1 This section situates the findings from this new wave of research in the wider context of existing research and evidence.

### Aggregate effects of new supply

- 5.2 The pre-existing evidence base showed that additional housing supply changes prices in the long term, but this new evidence shows that supply also has short-term effects on prices and rents. A key point here is that the short-term effects of individual developments are concentrated at the local level, and harder to measure at regional or national levels. So it is usually only when the impacts of many developments are aggregated over time that an effect large enough to be measured at regional and national level is generated.
- 5.3 Another important point made by the new literature is that new housing supply and the moving chains it initiates lead to immediate improvements in housing quality for multiple households ahead of and in addition to any reduction in prices and rents. These improvements in quality and choice strengthen the case for new homes.

### Filtering

- 5.4 Previous research has shown that new buildings ‘filter’ down to lower-cost market segments over time, as long as the supply of newer buildings is large enough relative to demand ([Liu et al, 2022](#)). The research reviewed here sheds light on how this process happens: new supply initiates chains of moves that create vacancies in older buildings, and if the vacancies are numerous or persistent enough the owners of those buildings lower prices or rents in order to fill the vacancy. Filtering is therefore an intermediate mechanism between the short-term changes initiated by new supply and the long-term impact of supply on prices.

### Housing moves

- 5.5 For new supply to generate the kinds of moving chains reaching into low-income areas that these papers identify, two conditions appear to be required: firstly, most moves into new build homes and subsequent homes in the chain should be from within the same housing market area; secondly, the financial and other costs of moving should be substantial enough for most voluntary moves to be motivated by significant changes in quality rather than minor changes in affordability.
- 5.6 To assess the first criterion, we start by noting that in the data used by Mast (2021), 67% of people moving into new build homes in or near US city centres came from the same metropolitan area, while in the Helsinki study the figure was 90%. It is unsurprising that the Helsinki figure is higher, given it is relatively isolated from other cities in Finland whereas many US cities are part of much larger mega-regions with considerable inter-urban mobility.
- 5.7 Most moves into new homes in London also appear to be relatively short distances. 2019 data on moves into private rented homes produced for the GLA by the rental analysis firm Dataloft showed that around half of households moving into new build private rented homes came from within a 5 miles radius (Cosh and Gleeson 2020). This figure is almost identical to the share of private renters moving less than 5 miles into recently built homes (those built after 2001) in the 2010s from GLA analysis of English Housing Survey data. According to the same analysis, around 82% of owner occupiers and 62% of private renters who moved into new homes in London came from less than 10 miles away. The fact that these patterns are broadly consistent with those identified by Mast suggests that similar dynamics to those he identifies are at work in London's housing market.
- 5.8 As for the second criterion, English Housing Survey data analysed in the GLA's [2019 Housing in London report](#) (Cosh and Gleeson 2019) indicates that by far the most

common reason given for moving by households in London is that they wanted to move to a better neighbourhood / to be near a better school, or because they wanted a larger home. A substantial number of households said they moved because their previous accommodation was in poor condition or otherwise unsuitable, while a relatively small proportion said they moved because they wanted a cheaper home. These findings are consistent with most households moving because of substantial changes in quality rather than minor changes in affordability, and thus with a housing market where improved availability in one segment is swiftly 'transmitted' to others.

#### Effects on different market segments and income levels

- 5.9 There is a limited existing economic literature on the impacts of new housebuilding on the cost of housing aimed at households at different income levels. One notable paper is by Diamond and McQuade (2019), who find that building affordable housing targeted at households on low to moderate incomes tends to lower nearby property values when it occurs in high-income neighbourhoods but to increase values when it occurs in low-income neighbourhoods. They attribute this finding to the different impact of the new housing, its residents and associated amenity impacts relative to the existing neighbourhood context.
- 5.10 The papers reviewed here present a complex picture on the extent to which new supply of (often relatively expensive) market-rate homes affect affordability of lower-cost homes. Looking first at papers identifying hyper-local effects, Li finds larger effects of market-rate supply on the rents of higher-cost homes in the immediate area, while Blanco and Neri find that market-rate supply can push up rents in low-cost areas when accompanied by a substantial improvement in amenities. Relatedly, [Damiano and Frenier \(2020\)](#) find that new market-rate construction in Minneapolis increases the rents of nearby low-cost homes (although Phillips et al 2021 raise some concerns over the representativeness of the trends identified). Asquith et al find that new market-rate construction in areas with below average incomes lowers rents in the immediate area, although their rental data is more representative of the upper end of the market.
- 5.11 Turning to papers that examine wider effects, Mast and Bratu et al find that market-rate supply increases mobility from low-income areas and among low-income households, implying a loosening of the market. Mense finds that new supply causes rents in all market segments to fall, although those at the higher end fall by more.
- 5.12 To understand these results, it is helpful to distinguish between the concentrated impact of a new development on its immediate area and the more diffuse impacts on its wider area transmitted via moving chains. In the immediate area, higher-end properties are more likely to see an increase in supply as they are closer substitutes for new market-rate homes, while lower-end properties are relatively likely to see an increase in demand due to improved amenities. As moving chains diffuse the supply impacts across a wider area, availability and affordability improves in all market segments, but less so at the lower end of the market because chains are more likely to 'break' before they reach that far.

#### Gentrification and displacement

- 5.13 The findings of the new research reviewed here chime with some recent empirical research into the causes and effects of gentrification. For example, [Cho and Whitehead \(2022\)](#) report an increase after the financial crisis in the proportion of high-income households moving into more deprived areas across the country, but particularly in high-cost areas such as London. They argue that the trend is driven by increasing affordability constraints (particularly when it comes to buying a home) affecting even higher-income households,

and is facilitated by relatively low levels of housebuilding in less deprived areas. In other words, it is the reverse of what these new studies find to be the impact of building more homes in high-demand areas.

- 5.14 Gentrification is sometimes linked to increased rates of displacement of existing residents (particularly those on low incomes) as an area changes. However, [Fransham \(2020\)](#) found that gentrification typically changes the social mix of an area over time by affecting who moves into it rather than who moves out, a finding also supported by [Freeman et al \(2023\)](#). The papers reviewed here (particularly Mense 2021) indicate that the costs of moving are high and that the availability of higher quality alternative accommodation matters at least as much as affordability, which supports Fransham's finding that gentrification tends not to result in 'direct displacement' (making more low-income households move *out* of an area) but in 'exclusionary displacement' (making it harder for them to move *in* to an area). The research as a whole indicates that increased supply of both market and social housing reduce both direct and exclusionary displacement pressures.
- 5.15 One implication of the paper by Blanco and Neri on the price impacts of estate regeneration schemes in London is that some neighbourhoods in London (and in other high-cost cities) are only relatively affordable because they have or are perceived to have relatively low levels of safety, school quality or neighbourhood amenities. It follows that any successful measures to improve these factors would push up costs by attracting higher-income households to the area. The impact on costs and affordability for low-income households would if anything be likely to be greater if these improvements were *not* accompanied by new supply.
- 5.16 This suggests that efforts to regenerate or improve the quality of life in low-income neighbourhoods, whether through restate redevelopment or other policies, should be accompanied not just by protections for social housing tenants in the area but also by increased housing supply in more affluent areas (thereby drawing away some demand from high-income households) if affordability for low-income households in market housing is not to be worsened.

## 6. Conclusions

- 6.1 Bringing together the pre-existing evidence base, the insights from the seven papers reviewed here and the related research findings summarised in the previous section, the key points of the new evidence base on the impacts of housing supply can be summarised as follows.
  - **New homes deliver improved choice and affordability for households beyond the immediate beneficiaries.** The chains of moves initiated by new supply mean that one new home, even an expensive one, can improve the housing circumstances of several households. New market-rate supply can also make housing more affordable – and where it doesn't, it is probably because it is accompanied by significant improvements in local amenities.
  - **The benefits of new supply extend beyond improvements in affordability.** The most immediate impact is that the chain of moves set off by a new home can enable several households to move to a better-quality home, or one that better matches their preferences (even if it costs more than their previous home).
  - **These benefits can spread quickly across a market area.** New supply quickly initiates chains of moves that reach across housing markets, and can also lead to rapid

changes in local prices and rents – but the direction of change in costs depends on whether the increase in supply outweighs any improvement in amenities.

- **Building relatively high-cost new homes in one area can lead to increased availability of low-cost housing in another area** because local housing markets are not highly segmented and moving chains link one segment to another.
- **Most housing moves, including moves into new homes, originate from the same housing market area.** This implies that while building new homes in a particular *neighbourhood* does induce households to move into that neighbourhood who otherwise might not have, it doesn't do much to affect flows of households between larger *regions* (for example, between the wider London region and the rest of the country), which are driven more by differences in relative economic performance.
- **Building market-rate homes only in low-income areas will induce higher-income households to move into those areas, potentially increasing gentrification pressures.** These pressures will be greater if the new homes are accompanied by significant improvements in local amenities.
- **Building new market-rate homes in high-income areas ultimately reduces gentrification pressures elsewhere,** even when those new homes are expensive, because it induces higher-income households to move in. Market-rate homes built in high-income areas are also less likely to have a transformative impact on local amenities and therefore more likely to reduce overall housing costs through the supply effect.
- **When demand for high-cost homes is not met by new supply it is primarily low-income households that lose out,** because low-income households benefit from the construction of even high-cost homes while high-income households can afford to satisfy their housing needs even in the absence of new supply.
- But while all kinds of new homes ultimately improve the availability of housing across the income spectrum, **new social housing provides the most immediate and direct benefits for low-income households.**

## References

- Andrews, D. (2010). Real House Prices in OECD Countries: The Role of Demand Shocks and Structural and Policy Factors. OECD. <https://doi.org/10.1787/5km33bqzhbzt-en>
- Asquith, B., Mast, E., & Reed, D. (2023). Local Effects of Large New Apartment Buildings in Low-Income Areas. *Review of Economics and Statistics*.  
[https://doi.org/10.1162/rest\\_a\\_01055](https://doi.org/10.1162/rest_a_01055)
- Blanco, H., Neri, L. (2023). Knocking it down and mixing it up: The impact of public housing regenerations. IZA Institute of Labor Economics.  
<https://www.iza.org/publications/dp/15855/knocking-it-down-and-mixing-it-up-the-impact-of-public-housing-regenerations>
- Bratu, C., Harjunen, O., & Saarimaa, T. (2023). JUE Insight: City-wide effects of new housing supply: Evidence from moving chains. *Journal of Urban Economics*.  
<https://doi.org/10.1016/j.jue.2022.103528>
- Bramley, G. (2019). Housing supply requirements across Great Britain for low-income households and homeless people: Research for Crisis and the National Housing Federation; Main Technical Report. Heriot-Watt University. <https://doi.org/10.17861/bramley.2019.04>
- Bramley, G., Pawson, H., White, M., & Watkins, D. (2010). Estimating Housing Need. Department for Communities and Local Government.  
<https://www.gov.uk/government/publications/estimating-housing-need>
- Cho, Y., Whitehead, C. (2022). Better off households moving to more deprived areas: What is happening? Why? *Journal of Housing and the Built Environment*.  
<https://doi.org/10.1007/s10901-021-09873-6>
- Cosh, G., Gleeson, J. (2019). Housing in London 2019: The evidence base for the Mayor's Housing Strategy. Greater London Authority. <https://data.london.gov.uk/housing/housing-in-london/>
- Cosh, G., Gleeson, J. (2020). Housing in London 2020: The evidence base for the Mayor's Housing Strategy. Greater London Authority. <https://data.london.gov.uk/housing/housing-in-london/>
- Damiano, A., Frenier, C. (2020). Build Baby Build?: Housing Submarkets and the Effects of New Construction on Existing Rents. University of Minnesota, Center for Urban and Regional Affairs. <https://www.tonydamiano.com/project/new-con/bbb-wp.pdf>
- Diamond, R., McQuade, T. (2019). Who Wants Affordable Housing in Their Backyard? An Equilibrium Analysis of Low-Income Property Development. *Journal of Political Economy*.  
<https://doi.org/10.1086/701354>
- Fransham, M. (2020). Neighbourhood gentrification, displacement, and poverty dynamics in post-recession England. *Population, Space and Place*. <https://doi.org/10.1002/psp.2327>
- Freeman, L., Hwang, J., Hauptert, T., & Zhang, I. (2023). Where Do They Go? The Destinations of Residents Moving from Gentrifying Neighborhoods. *Urban Affairs Review*.  
<https://doi.org/10.1177/10780874231169921>
- Grein, N. (2022). The Impact of New Market Rate Housing on Neighborhood Affordability. Portland State University: Center for Real Estate.

[https://www.pdx.edu/realestate/sites/g/files/znlchr3251/files/2022-11/01\\_NateGrein\\_2Q22.pdf](https://www.pdx.edu/realestate/sites/g/files/znlchr3251/files/2022-11/01_NateGrein_2Q22.pdf)

Li, X. (2022). Do new housing units in your backyard raise your rents?. *Journal of Economic Geography*. <https://doi.org/10.1093/jeg/lbab034>

Liu, L., McManus, D., & Yannopoulos, E. (2022). Geographic and temporal variation in housing filtering rates. *Regional Science and Urban Economics*. <https://www.sciencedirect.com/science/article/pii/S0166046221001186>

Mast, E. (2021). The effect of new market-rate housing construction on the low-income housing market. *Journal of Urban Economics*. <https://www.sciencedirect.com/science/article/abs/pii/S0094119021000656>

Mense, A. (2023). Secondary housing supply. London School of Economics. <https://eprints.lse.ac.uk/118645/>

MHCLG (2018). Analysis of the determinants of house price changes. Ministry of Housing, Communities and Local Government. <https://www.gov.uk/government/publications/analysis-of-the-determinants-of-house-price-changes>

Pennington, K. (2021), Does building new housing cause displacement? The supply and demand effects of construction in San Francisco. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3867764](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3867764)

Phillips, S., Manville, M., & Lens, M. (2021). Research Roundup: The Effect of Market-Rate Development on Neighborhood Rents. UCLA: The Ralph and Goldy Lewis Center for Regional Policy Studies. <https://escholarship.org/uc/item/5d00z61m>

Shuttleworth, I., Cooke, T., & Champion, T. (2018). Why did fewer people change address in England and Wales in the 2000s than in the 1970s? Evidence from an analysis of the ONS Longitudinal Study. *Population, Space and Place*. <https://doi.org/10.1002/psp.2167>



## Appendix 7

### PLANNING HISTORY SCHEDULE

---



## Appendix 7 – Planning History

This note has been prepared to set out a summary of planning history for the site at Camden Goods Yard, Chalk Farm Road, London, NW1 8EH.

### Contents

<b>Planning permission history.....</b>	<b>1</b>
<b>Other applications.....</b>	<b>8</b>
<b>Description of Development .....</b>	<b>9</b>
<b>S106 history .....</b>	<b>13</b>

### Planning permission history

ORIGINAL PLANNING PERMISSION				
#	Submitted	Approved	LBC Ref.	Details
1	07.07.17	15.06.18	2017/3847/P	<p>Redevelopment of the main supermarket site with 7 buildings of up to 14 storeys, 573 homes, up to 60,658 sqm GEA of residential floorspace and up to 28,345 sqm GEA non - residential floorspace.</p> <p>Inclusion of a temporary foodstore on the PFS parcel (as part of the ground and first floor of a six-storey building) to enable Morrisons to relocate from its current site.</p>
S73 APPLICATIONS TO VARY CONDITIONS				

#	Submitted	Approved	LBC Ref.	Relevant planning conditions	Summary of amendments
1	07.01.20	05.05.20	2020/0034/P	4 and 70	Increase in the duration of the temporary foodstore from 30 to 50 months and the provision of a new, 1,403 sqm (GEA) temporary, single storey standalone building within which the foodstore will operate. An uplift in parking for the foodstore.
2	23.07.20	07.12.20	2020/3116/P	3 and 73	An additional storey atop buildings A, B, C, and F, meaning that each building will have 15 rather than 14 storeys. Relocation of concierge to Block A. Alterations to basement and landscaping.
3	23.08.22	29.03.23	2022/3646/P	4, 5, 6, and 36	Demolition of the PFS site. Instalment of a public 4 bay Electronic Vehicle ultra rapid charging station. Removal of vehicular crossover access from Chalk Farm Road. Introduction of a mezzanine level. Enlargement of the office lobby to include a café. Rationalisation of plan space at the ground floor. Extension of the building footprint westward. Reconfiguration of the Morrisons store to widen the frontage. Internal reconfiguration of the Corner Building to replace the café-restaurant with office space.
<b>S96A APPLICATIONS (NON-MATERIAL AMENDMENTS)</b>					
#	Submitted	Approved	LBC Ref.	Relevant planning conditions	Summary of amendments

1	15.01.19	06.02.19	2019/0153/P	47, 48, and 49	Changes to the timing of triggers for submission of details for conditions.
2	10.06.19	06.02.19	2019/2962/P	29, 50, and 60	Amended and replaced these conditions for redevelopment of the PFS site and main supermarket site.
3	19.12.19	24.12.19	2019/6301/P	Description of Development ( <b>DoD</b> )	<p>Variation of description of temporary supermarket in description of development of planning permission 2017/3847/P dated 15/06/2018 (as amended by 2019/0153/P dated 6th Feb 2019 and 2019/2962/P dated 4th July 2019) for redevelopment of the petrol filling station site and main supermarket site.</p> <p>No physical alterations proposed. The changes to the wording leave the operative parts of the planning permission unaltered.</p>
4	29.05.20	18.06.20	2020/2325/P	25	Relocation of the temporary supermarket, pedestrian circulation, vehicle egress 1.5m northwest along Chalk Farm Road. Minor revision to the positioning of the cycle parking to allow space for 8 cargo bike spaces.
5	07.07.20	09.07.20	2020/2786/P	73 and DoD	<p>Amended the description of the development to omit the number of storeys, unit numbers and floorspace quantum from the development description.</p> <p>Inserted condition 73: “seven buildings of up to 14 storeys comprising 573 homes (389 market and 184 affordable in up to 60,568 sq m GEA of residential floorspace) together with up to 28,345 sq m GEA non-residential floorspace.</p>

6	01.02.21	02.02.21	2021/0388/P	4	Amendment to the 2018 Permission involving insertion of trolley bay at front entrance of the temporary supermarket, thus replacing condition 4.
7	11.06.21	17.09.21	2021/2864/P	2, 8, 9, 27, 51, 53, 55, 56, 58, 60 and 65	<p>Replacement of following conditions of planning permission ref. 2020/3116/P dated 03/11/2020:</p> <ol style="list-style-type: none"> <li>1. Condition 2 (residential sound mitigation)</li> <li>2. Condition 8 (enhanced sound insulation between dwellings)</li> <li>3. Condition 9 (enhanced sound insulation between uses)</li> <li>4. Condition 27 (Block B; Roundhouse Way)</li> <li>5. Condition 51 (Living roofs)</li> <li>6. Condition 53 (rainwater recycling)</li> <li>7. Condition 55 (Bird and Bat Boxes)</li> <li>8. Condition 56 (Mechanical ventilation)</li> <li>9. Condition 58 (Air Quality Monitoring)</li> <li>10. Condition 60 (Lighting Strategy)</li> <li>11. Condition 65 (Signage Strategy)</li> </ol>

8	28.07.21	24.08.21	2021/3337/P	3 and 5	<p>Amendments to basement below Blocks A and F and internal changes to supermarket in Block B (amendment to planning application ref. 2020/3116/P dated 03/11/2020. Thus, replacing conditions 3 and 5.</p> <ol style="list-style-type: none"> <li>1. Basement wall adjacent to Block A realigned</li> <li>2. Removal of B2 basement level below Block A</li> <li>3. Block F north wall realignment</li> </ol> <p><u>Morrisons Store</u></p> <ol style="list-style-type: none"> <li>1. Realignment of southwest wall to provide regular shaped sales floor footprint</li> <li>2. Relocation of internal stair to the front of the store</li> <li>3. Removal of slab at the front of store</li> <li>4. Revised positions of structural columns within the store</li> <li>5. Raise of internal finished floor level by 150mm of Morrisons sales floor area</li> </ol> <p><u>Morrisons Car Park</u></p> <ol style="list-style-type: none"> <li>1. Repositioning of escape stair from south-east corner of car park to ensure escape at Level 00</li> </ol>
9	22.02.22	23.02.22	2022/0673/P	DoD and creation of condition 74	Amendment to the 2018 Permission – changing the description of development

10	05.10.22	20.12.22	2022/4273/P	3 and 5	<p>Amendments to planning permission ref. 2020/3116/P dated 03/12/2020, involving amendments to:</p> <ol style="list-style-type: none"> <li>1. Facades and fenestration of blocks A, B and C.</li> <li>2. Relocation of substation from block C to block B and replacement of Block C substation with retail (Class E).</li> <li>3. Alterations to roof plant enclosure and parapet of Block A.</li> <li>4. Installation of 2nd lift for Urban Farm.</li> <li>5. Alterations to cycle parking and internal plant.</li> <li>6. Alterations to roof and south terrace balustrade of block B.</li> </ol>
11	19.12.22	30.03.23	2022/5571/P	3, 4, and 6	<p>Amendments to affordable workspace building footprint and fenestration alongside change of use from office (E) to affordable workspace (E) and relocation of internal cycle parking.</p>
12	18.04.23	26.04.23	2023/1560/P	3	<p>Amendments to planning permission ref. 2022/3646/P dated 29/03/2023 - amendments to Block B roof level including greenhouse roof form and footprint and urban farm layout. Alterations to balcony design Block B.</p>
13	29.06.23	01.12.23	2023/2596/P	19, 46 and DoD	<p>Amendments to planning permission ref. 2022/3646/P dated 29/03/2023 – changed to the description of development and replacement of conditions 19 and 46. Alterations to spandrel panel in Block A.</p> <ol style="list-style-type: none"> <li>1. Amendment to approved description of development to capture minor update from the Planning Permission ('PFS' and 'Class E').</li> <li>2. Minor change to the approval trigger for Condition 19.</li> </ol>

					<p>3. Minor change to the wording of Condition 46.</p> <p>4. Update to one approved section plan for Block A to reflect a minor elevational change.</p>
14	08.07.24	23.08.24	2024/2791/P	4, 5, 6, and 36	Amendments to planning permission 2022/3646/P dated 29/03/2023 - Minor elevational update to Block A featuring the replacement of a window bay of the gym with a solid precast panel.
15	11.09.24	07.11.24	2024/4241/P	DoD	<p>1. Minor amendment to the approved description of development - removal of 'the winter garden'</p> <p>2. Minor ground floor fenestration detail and internal layouts to Block A relating to residential facilities, workshops and BoH areas.</p> <p>LBC agreed in principle for the update to the description of development to remove the reference of the 'wintergarden' to be made in a s96a nonmaterial amendment application in a pre - application meeting on 23.04.24.</p>

## Other applications

OTHER APPLICATIONS						
#	Submitted	Approved	LBC Ref.	Relevant planning conditions	Summary of amendments	Type of application
1	28.05.21	29.06.21	2021/2647/T	28	FRONT ENTRANCE AREA: 1 x Red Oak Fastigate (T1) - Fell to ground level. 1 x Callery Pear (T2) - Fell to ground level.  Planning Condition 28 (tree planning) within planning permission 2020/3116/P – contains confirmation that two new trees will be planted to replace those that were felled.	Tree removal application
2	07.03.23	09.05.23	2023/1099/P	Change of use	Temporary change of use in Block A of a retail unit (Class E) on ground and mezzanine floors and of 2 residential units (Class C3) on level 02 to a Sales and Marketing Suite (Sui Generis) for 10 years commencing January 2024.	Full planning permission
3	04.10.24	TBC	2024/4323/P	-	Full planning permission for continued use of temporary store (a further 25 months). Effect of extension is to allow the operation of the temporary Morrisons food store from 50 to 75 months.	Full planning permission



## Description of Development

EVOLUTION OF THE DESCRIPTION OF THE DEVELOPMENT						
#	Submitted	Approved	LBC Ref.	Relevant planning conditions	Summary of amendments	Type of application
1	19.12.19	24.12.19	2019/6301/P	DoD	<p>Variation of description of temporary supermarket in description of development of planning permission 2017/3847/P dated 15/06/2018 (as amended by 2019/0153/P dated 6th Feb 2019 and 2019/2962/P dated 4th July 2019) for redevelopment of the petrol filling station site and main supermarket site.</p> <p>No physical alterations proposed. The changes to the wording leave the operative parts of the planning permission unaltered. The new description will omit the reference to the precise location and 30-month duration of use of the temporary A1 food store.</p>	96A
2	07.07.20	09.07.20	2020/2786/P	DoD and creation of condition 73	<p>The new description will omit reference to the number of storeys, unit numbers and floorspace quantum. The numbers will be secured via a newly added condition rather than included within the description of development..</p> <p>Inserted condition 73: “seven buildings of up to 14 storeys comprising 573 homes (389 market and 184 affordable in up to 60,568 sq m GEA of residential floorspace) together with up to 28,345 sq m GEA non-residential floorspace.”</p>	96A

3	22.02.22	23.02.22	2022/0673/P	DoD and creation of condition 74	Amendment to the 2018 Permission – changing the description of development. The new description will omit reference to the reprovision of a petrol filling station on the original petrol filling station part of the site fronting Chalk Farm Road. The mix of uses including the petrol filling station use (Sui Generis) are still secure	96A
4	29.06.23	01.12.23	2023/2596/P	19, 46 and DoD	<p>The amendments to the approved scheme include alterations to wording of the development description to include '(PFS)' after petrol filling station for clarity.</p> <p>The description is as follows:</p> <p><i>“Redevelopment of petrol filling station (PFS) site to include the erection of a new building to accommodate flexible retail/food &amp; drink floorspace (Class A1, A3 uses), 2 Class B1 floorspace and a winter garden; with cycle parking, public space, public toilets and other associated works and highways works; all following demolition of existing petrol filling station. Use for a foodstore (Class A1 use) with associated car parking for a temporary period.</i></p> <p><i>Redevelopment of the main supermarket site to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) for new homes (Class C3 market and affordable) together with non-residential floorspace comprising foodstore (Class A1), flexible retail/food &amp; drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, cafe and restaurant activities; together with new</i></p>	96A

					<p><i>streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore.”</i></p> <p>This is the operative description of development at the time of writing (04.11.2024).</p>	
5	11.09.24	07.11.24	2024/4241/P	DoD	<p>Amend the Third S73 Permission, which includes the removal of the ‘winter garden’ from the east elevation of the PFS site.</p> <p>A proposed Revised Description of development for the Third S73 Permission is set out below with the proposed amendment in <b>red</b>:</p> <p><i>“Redevelopment of petrol filling station (PFS) site to include the erection of a new building to accommodate flexible retail/food &amp; drink floorspace (Class A1, A3 uses), Class B1 floorspace <del>and a winter garden</del>; with cycle parking, public space, public toilets and other associated works and highways works; all following demolition of existing petrol filling station. Use for a foodstore (Class A1 use) with associated car parking for a temporary period.</i></p> <p><i>Redevelopment of the main supermarket site to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) for new homes (Class C3 market and affordable) together with nonresidential floorspace comprising foodstore (Class A1), flexible retail/food &amp; drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility (Sui Generis use); with associated</i></p>	96A

					<i>ancillary office, storage, education, training, cafe and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of food store (the Revised Description)”</i>	
--	--	--	--	--	---	--

**S106 history**

<b>S106 AGREEMENT AND DEEDS OF VARIATION</b>			
<b>#</b>	<b>Dated</b>	<b>LBC Ref.</b>	<b>Details</b>
1	15.06.2018	Accompanies the original planning permission dated 15 June 2018 (2017/3847/P)	Original S106 agreement securing numerous planning obligations relating to the development of the site including the provision of affordable housing, payment of financial contributions, delivery and use of non-residential floorspace, local employment requirements, and various transport and energy matters.
2	05.05.2020	Accompanies the First S73 application (2020/0034/P)	<p>Revisions to a number of the obligations relating to Phase 1 so that they either:-</p> <ul style="list-style-type: none"> <li>(a) apply specifically to the temporary supermarket development (Phase 1a); or</li> <li>(b) exclude the temporary supermarket development (Phase 1a) from those obligations so that its development would not trigger the obligations that currently apply to Phase 1; or</li> <li>(c) apply specifically to the office /retail development (Phase 1b) .</li> </ul> <p>Also:</p> <ul style="list-style-type: none"> <li>(a) included some “top-up payments” to contributions already secured in the S106 as a result of the sub-division of Phase 1 (construction management monitoring (£5,000) and carbon offsetting (£13,361), and a new construction management bond (£9,000) relating to Phase 1a required as a result of a change in policy since the 2018 planning permission was granted</li> <li>(b) extended the duration of use of the temporary store from 30 months to 50 months;</li> <li>(c) amended the first criteria for assessing “Substantial Implementation”, which if not achieved could trigger the affordable housing viability review provisions. Practical</li> </ul>

			completion of the temporary supermarket development to shell and core standard within 30 months from, but excluding, the date of the grant of the original planning permission dated 15 June 2018 (i.e before 15 December 2020) must now be achieved (the previous requirement was for practical completion of Phase 1 to be achieved before 15 December 2020).
3	03.12.2020	Accompanies the Second S73 application (2020/3116/P)	<p>Amendments to the S106 as follows:</p> <ul style="list-style-type: none"> <li>(a) Submission of the detailed basement construction plan prior to Phase 2a Implementation;</li> <li>(b) Payment of a construction management bond (£15,000) prior to Phase 2a demolition works or implementation of Phase 2a;</li> <li>(c) A reduction in the number of supermarket car parking spaces and the removal of the requirement for a supermarket car park bond;</li> <li>(d) Amendment to the supermarket car park management plan to require the number of parking spaces to be kept under review and should they become surplus to requirements to consider how they should be repurposed;</li> <li>(e) Amendment to the obligations for the provision of the access road (petrol filling station) to amend the trigger for the works to achieve adoptable standard, from prior to occupation to Phase 1a to prior to occupation of Phase 1b (the final built development on the PFS site), and for those works to be carried out in phases by the owner and/or the Council;</li> <li>(f) Amendments to the employment obligations to clarify that construction apprentices must be employed for the construction phase across the entirety of the site (apart from the supermarket development) and the rollover of shortfall in provision to future phases of the development, with the default contribution only payable if there is a deficit in apprenticeship provision at the conclusion of the final development phase;</li> <li>(g) 19 additional affordable housing units (8 London affordable rented units and 11 intermediate units);</li> </ul>

			<p>(h) The deletion of the obligations relating to grant funding and alternative affordable housing mix previously required under the S106;</p> <p>(i) The deletion of all obligations relating to the decentralised energy network; and</p> <p>(j) Minor amendments to:</p> <ul style="list-style-type: none"> <li>• secure compliance with additional documents forming part of the S73 Application;</li> <li>• update the properties affected by the “Agent of Change” obligations in the S106;</li> <li>• reflect the changes to unit numbers and floorspace figures; and</li> <li>• secure the increase in the number of wheelchair accessible units from 57 to 71.</li> </ul> <p>(k) Replacement plans as appropriate</p>
4	29.03.2023	Accompanies the Third S73 application (2022/3646/P)	<p>Amendments to the S106 as follows:</p> <p>(a) To reflect the S73 Application and associated planning permission and tie the existing obligations to this further permission;</p> <p>(b) Payment of a public open space provision contribution of £25,120 (indexed from the date of the DOV) on or prior to occupation of the Phase 1b development;</p> <p>(c) Submission of an EV charging station management plan on or prior to occupation of the Phase 1b development and retention of the EV charging station for the lifetime of the development in accordance with the approved management plan (as may be varied from time to time);</p> <p>(d) Payment of an additional employment contribution of £51,935 (indexed from the date of the DOV) on or prior to implementation of the Phase 1b development;</p> <p>(e) An increase to the minimum number of required apprenticeships (73 up to 76) and work placement opportunities (20 up to 24) with a commensurate change to the associated default contributions that become payable for any under delivery of apprenticeships;</p> <p>(f) Submission of a whole life cycle carbon plan on or prior to occupation of the Phase 1b development and subsequent compliance with the approved carbon plan (as may be varied from time to time); and</p>

			<p>(g) Revised plans showing the building footprints and public realm being substituted into the S106 to reflect the design changes to the PFS site and affordable workspace</p> <p>(h) The following changes relating to the delivery of the affordable workspace:</p> <p>(i) Amendment to the obligations for the provision of the affordable workspace to:</p> <ul style="list-style-type: none"> <li>• amend the trigger for submission of the affordable workspace plan so that it is required to be submitted on or prior 30 June 2023 or implementation of the building within which the affordable workspace is provided (whichever is earlier);</li> <li>• amend the trigger for submission of the marketing strategy so that it is required to be submitted on or prior to 30 June 2023 or implementation of the building within which the affordable workspace is provided (whichever is earlier);</li> <li>• restate the restriction preventing occupation of the supermarket development or the building within which the affordable workspace is provided (whichever is the earlier) until the Council has approved the marketing strategy; and</li> <li>• require the laying out, construction and fitting out of the affordable workspace in accordance with the affordable workspace plan within six (6) months of the date of opening of the supermarket development.</li> </ul>
5	11.10.2024	n/a	<p>Variations to obligations relating to the delivery of affordable housing, the timeframes for submitting the Rooftop Use Management Plan and Youth Space Outline Proposal, and details of the Phase 3 Car Parking Management Plan, and Phase 1b Architect.</p> <p>More specifically:</p> <p>(a) Replacement of Niall McLaughlin Architects as Phase 1b Architect with Stiff + Trevillion Architects;</p> <p>(b) Updating the trigger for submission to the Council of the Youth Space Outline Proposal to within 6 months following commencement of the Block B internal fit out works (not including remaining shell and core works such as blockwork partitions and soil vent pipes);</p>



			<p>(c) Updating the trigger for submission to the Council of the Rooftop Use Management Plan to prior to the Implementation of construction works for the Sui Generis Rooftop Use;</p> <p>(d) Amending the details of the Phase 3 Car Parking Management Plan to reflect that this will now include:</p> <ul style="list-style-type: none"> <li>• 20 car parking spaces comprising 2 car club spaces, 7 on-street disabled spaces and 11 disabled spaces to be provided as part of Block F;</li> <li>• details of how and where the 2 car club car parking spaces will be allocated; and</li> <li>• no less than 18 disabled parking bays located on the Phase 3 Development;</li> </ul> <p>(e) Updating the definition of Intermediate Rented Housing to:</p> <ul style="list-style-type: none"> <li>• revise the qualifying household income to £67,000, to align with updated London Borough of Camden's adopted policy and the latest London Plan Annual Monitoring Report (May 2024); and</li> <li>• revise the weekly rental figures for 1 bedroom and 2 bedroom properties to the latest Council guidance rents.</li> </ul> <p>(f) Removing the need for the Council to provide written notice that it is satisfied that construction of the Affordable Housing Units has been completed in a good and workmanlike manner using good quality materials.</p> <p>(g) Updating the threshold for the Occupation restrictions on the Open Market Dwellings relevant to the delivery of the Affordable Housing Units as follows:</p> <ul style="list-style-type: none"> <li>• no more than 25% (which is confirmed to comprise 110 units) until such time as a contract for 21% of the Affordable Housing Units has been entered into with a Registered Provider and the works of construction and fitting out of 21% of the Affordable Housing Units have been completed (with an amendment to the corresponding notification requirement in the S106);</li> <li>• no more than 49% of the Open Market Dwellings can be occupied until such time as a contract for 45% of the Affordable Housing Units has been entered into with a Registered Provider and the works of construction and fitting out of 45% of the Affordable Housing Units have been completed;</li> </ul>
--	--	--	---

			<ul style="list-style-type: none"> <li>• no more than 84% of the Open Market Dwellings can be occupied until such time as a contract for 77% of the Affordable Housing Units has been entered into with a Registered Provider and the works of construction and fitting out of 77% of the Affordable Housing Units have been completed; and</li> <li>• no more than 95% of the Open Market Dwellings can be occupied until such time as a contract for all of the Affordable Housing Units has been entered into with a Registered Provider and the works of construction and fitting out of all of the Affordable Housing Units have been completed.</li> </ul>
--	--	--	--