London Borough of Camden Housing Delivery Test - Action Plan

August 2020



Between 2016/17 and 2018/19 -

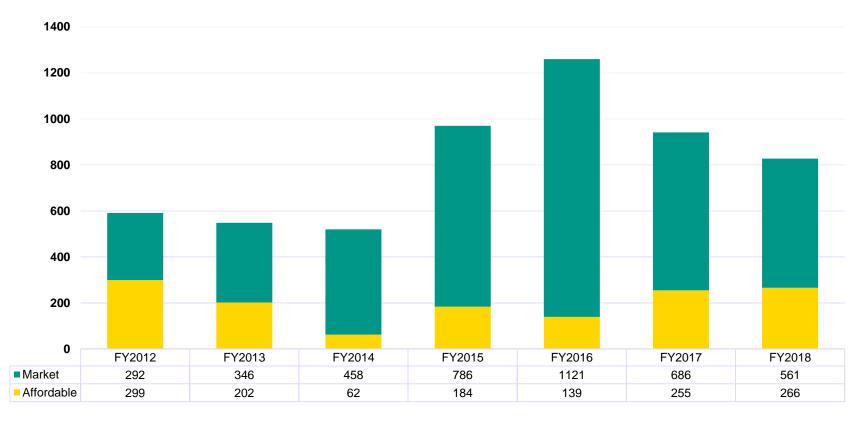
We had a target of 3360 new homes to be built in Camden. 2924 were delivered.



The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities introduced by the government. In 2019, the measurement for Camden was 87% (proportion of homes delivered compared to the target)

Under the 2019 rules if delivery falls below 95%, authorities must publish an action plan to explain how they will increase delivery in future years.

Camden's HDT Action Plan identifies 'issues' that have potentially affected delivery rates over the last 3 years and/or in the coming years and sets out a series of actions that the authority is, or will be, undertaking to address them.



Graph showing the total number of units (net) completed between 2012/13 and 2018/19. This has then been broken down by tenure. Figures for the 2019/20 were not available at the time that the action plan was published.

Format of the action plan

1. Understanding Camden

Sets out information about what Camden is like as a place and some of the challenges and opportunities that exist here.

3. Delivering new homes in Camden

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

NB: Sections 2 and 3 include information on what steps have already been undertaken to deliver more homes in Camden. This is in addition to the actions set out in Section 4

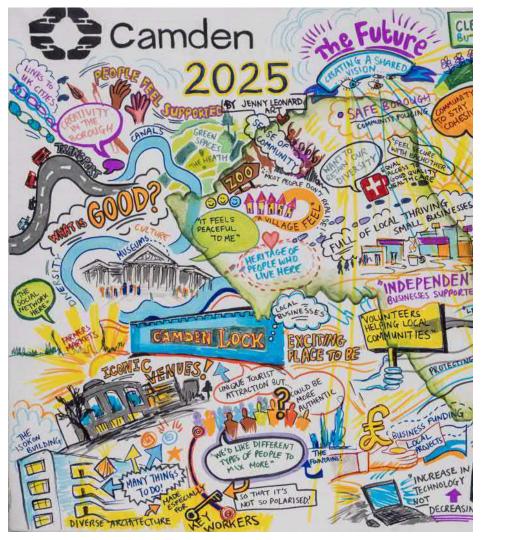
2. Planning in Camden

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

4. Next Steps

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

Understanding Camden



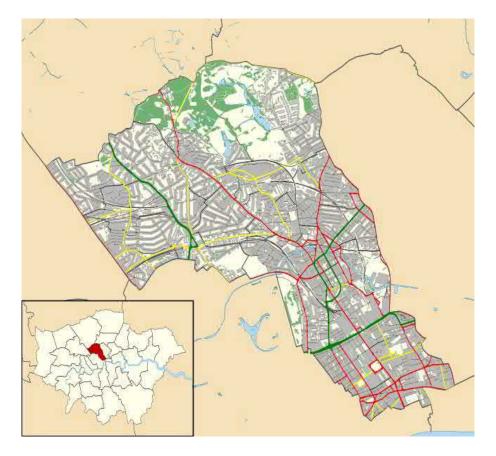
The Camden 2025 vision that the Council developed with it's communities is for...

Camden to be a better borough - a place where everyone has a chance to succeed and where nobody gets left behind.

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

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

Camden's demographic profile corresponds to a typical metropolitan city with a university presence: a large proportion of students and younger adults and relatively few children and older people compared to the national average – 38.1% of residents are aged under 30, 64.6% are aged under 45, with only 15.7% aged under-18¹.



Camden is unusual to many authorities in that it is the landlord for nearly a quarter (23%) of households in the borough. The borough is Landlord to 25,000 households and freeholder for an additional 7,000 leaseholds.

Our central location, and the range of amenities available, makes Camden a very attractive place to live, which in turn has an impact on the cost of living. As a result, affordable housing is often cited in Camden's residents' surveys as the factor most in need of improvement in the borough. In Camden, there are currently over 5,700 households on the Council's Housing Register of which 1,500 are currently living in overcrowded conditions.

We want to make sure that new homes being built in the borough address the needs of people who have less choice over housing options first. Affordable housing products especially larger units can have an influence on a scheme's viability and in certain situations the Council has to accepted a lower number of total new homes on a site to secure a greater percentage of affordable and/or larger units to help to meet local needs.

Every part of Camden has areas of relative affluence alongside areas of relative poverty. The gap in healthy life expectancy between the poorest and richest parts of the borough is too wide – poorer citizens are expected to die almost 20 years earlier than those who are better off.

Camden has one of the most dynamic economies in the UK and is home to a number of global businesses and academic and public institutions. The success of its economy relies on the wide variety of employment sectors including retail, health, tourism and the internationally significant 'knowledge and innovation sector'



Whilst approaching a quarter of a million people live in Camden, the daytime population swells to double as hundreds of thousands arrive to work, study or visit the borough each day (there are around 367,800 jobs here). Camden is just a fragment of Greater London, occupying only 1.4% by area (London's 8th smallest borough by area), but home to 7% of London's employment and 2.9% of its population. Camden is also home to several sites of international interest, such as the British Library, the British Museum and the world famous Camden Market, which receives 28 million visitors per year.

Camden's geographic position in central London, and the business environment developed, have enabled it to become one of the most important business locations in the country. Revised ONS estimates of Gross Value Added (GVA) show that Camden added £34.4bn to the national economy in 2018, an increase of 93% on 2008, growing faster than Central London (54%), Greater London (45%) or UK (34%). Camden contributes 7.6% of London's GVA and 1.8% of national (UK) GVA.

Knowledge Quarter Innovation District and key development sites

CONSERVATION AREAS & history. ARTICLE 4 DIRECTIONS HERITAGE AND CONSERVATION NEIGHBOURHOOD PLANS You can check if your property is listed or in a conservation area on the Council website here or type in Conservation Areas in the search bar on the website. CONSERVATION AREAS Conservation Area Conservation Area with Article 4 1. Alexandra Road Estate 2 Rentholomew Estate 3. Besize 4. Bloomsbury 5. Camden Broadway 6. Camden Square 7. Camden Town 8 Charlotte Street 9. Dartmouth Park 10. Denmark Street. 11. Elsworthy 12 Eton 13. Fitzjohns/Netherhall 14. Fitzrov Square 15. Hampstead 16. Hanway Street 17. Harmood Street 18. Hatton Garden 19. Highgate 35. Seven Dials Estate NEIGHBOUHOOD PLANS 20. Holly Lodge Estate 36. South Hampstead 21. Inkerman · Church Row and Perrins (formeley Swiss Cottage) 22 Jeffreys Street 37. South Hill Park Estate 23. Kelly Street Dartmouth Park 38. St. John's Wood 24. Kentish Town Drummond Street 39. West End Green 25. Kings Corss/ St. Pancras Fitzrovia East 40. West Kentish Town 26. Kingsway Fortune Green and West 27. Mansifeld Conservation Area Hampstead Article 4 28. Parkhill and Upper Park Article 4 in Conservation Area Kentish Town 29. Primrose Hill 9. Only for no. 33 York Rise Green Spaces 30. Priory Road 13. Only for the Cottage no. Mount Pleasant Regent's Canal 37. Only for nos. 32-86 (even) . Hampstead 31. Redington/Frognal

- Railway

- Camden Borough boundary

Underground station

32. Regent's Canal

33. Regent's Park

34 Rochester

and 72-90 (even) South Hill . Highgate

67 Fitzjohns Avenue

- Redington and Frognal

· Somers Town

The borough has a rich architectural heritage with many special places and buildings from Camden's history.

There are 39 Conservation Areas which cover almost 50% of the land area, recognising their architectural or historic interest and their character and appearance. Camden also has over 5,600 listed buildings and structures in a variety of ages, types and architectural styles.

Within Camden there are over 280 designated public and private spaces. These spaces are critical to sustainability and wellbeing providing places to relax, socialize, enjoy sport and take part in physical exercise. Many of the Borough's designated open spaces are located within Conservation Areas or designated as heritage assets in their own right.

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

2. Planning in Camden

Camden's Development Plan



The Camden Local Plan 2017 sets out a strategy for how the borough as a place should grow and develop over the plan period (2016-2031) and a range of general policies to help ensure that growth takes place in the right locations and in the right way.

Other plan documents adopted by the Council include:

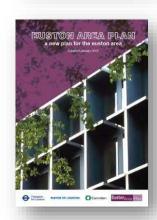
- 2013 Site Allocations Plan
- 2014 Fitzrovia Area Action Plan
- 2015 Euston Area Plan

There are also currently 5 made Neighbourhood Plans in the borough and 2 at an advanced stage (1 awaiting a public referendum and 1 submission draft currently under consultation). The current Camden Site Allocations Plan was adopted by the Council in September 2013. It sets out the Council's objectives and guidance for development of land and buildings on 43 significant sites across the borough. Site allocations are also included in the adopted Fitzrovia Area Action Plan (2014) and the Euston Area Plan (2015).

Since the Site Allocations Plan 2013 and the Euston Area Plan 2015 were adopted there have been a number of changes to the planning context including the publication of a new National Planning Policy Framework, an emerging new London Plan and the adoption of the Camden Local Plan.

Both the Site Allocations and Euston Area Plans are currently in the process of being reviewed and updated by the Council.





What steps have already been taken to encourage more homes to be built in Camden?

Proactive policies in the 2017 Local Plan:

Policy H1a – recognises self-contained housing as the priority land use of the Local Plan.

Policy H2 - seeks to maximise the delivery of self-contained housing by promoting the inclusion of self-contained housing in non housing development. Policy H2 requires 50% of all additional floorspace over 200sqm to be developed as self-contained housing where it meets set criteria within the Central London Area and designated centres.

Site Allocations Plan Review:

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

In preparing the Site Allocations Local Plan the Council identified and assessed over 220 sites. Given the number of sites identified we decided to undertake a staged assessment to ensure that we would only need to do a more detailed analysis of sites which had the most potential. The assessment used a blend of desktop assessments, informal discussions with key stakeholders and site visits. The emerging plan allocates over 90 individual development sites throughout the borough.

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



Map showing key development sites and areas in Camden for more information on these sites please visit: www.camden.gov.uk/site-allocations

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



Euston Area Plan Review:

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

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

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Decision making in Camden

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

During the 2020 Covid-19 Pandemic the Planning Service has worked hard to ensure that applications can continue to be determined and that pre-application discussions can still take place - including the use of video conference software to host planning committees and design review panels.

In 2019/20, the Council approved 93% of all received applications and only refused 2 major applications.



The number of dwelling units permitted in Camden has varied a lot over the last 7/8 years. In the years 2012/13 and 2014/15 the high number of new dwellings permitted is primarily due to schemes involving student accomodation coming forward in the borough. Historically student units used to equate to one dwelling in terms of delivery calculations but this has now changed. The current calculation is 2.5 non-self contained units = 1 dwelling.

In the last 3 years the number of new homes being approved has fallen below the number of new homes needed to meet our housing target. This is due to a number of factors including:

- A fall in the number of new student housing schemes being brought forward
- Increased number of applications for nonresidential uses coming forward outside of town centres and the Central Activities Zone

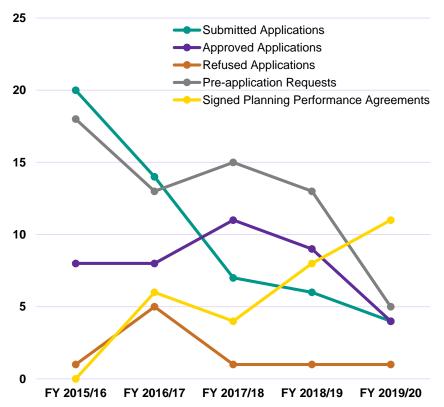
	Total dwelling units permitted (net)	Annual housing target	
FY2012/13	1596	665	+ 931
FY2013/14	1124	665	+ 459
FY2014/15	3380	665	+ 2715
FY2015/16	893	857	+ 36
FY2016/17	1086	1120	- 34
FY2017/18	617	1120	- 503
FY2018/19	1091	1120	- 29
Total	9787	6212	

Table showing how the total number of units permitted (net) compares with the annual housing target for that year. The table shows that the total number of permitted dwellings exceeds our cumulative housing target by 3575 units.

Looking at the current status of permitted dwellings specifically those in the earlier financial years (2012/13 – 2014/15) it is noted that a high percentage of units have either been completed or started. In addition, it should be noted that in most circumstances where an application has been superseded the new application usually proposes more residential units than the original application.

Year Permitted	Completed	Started	Not Started	Superseded	Lapsed	Total Permitted	
FY2012/13	1109 (69.49%)	202 (12.66%)	0	246 (15.41%)	39 (2.44%)	1596	
FY2013/14	667 (59.34%)	223 (19.84%)	0	199 (17.70%)	35 (3.11%)	1124	
FY2014/15	1353 (40.03%)	1246 (36.86%)	9 (0.27%)	185 (5.47%)	587 (17.37%)	3380	
FY2015/16	318 (35.61%)	451 (50.50%)	7 (0.78%)	39 (4.37%)	78 (8.73%)	893	
FY2016/17	222 (20.44%)	407 (37.48%)	436 (40.15%)	22 (2.03%)	-1 (-0.09%)	1086	
FY2017/18	40 (6.48%)	221 (35.82%)	342 (55.43%)	14 (2.27%)	0	617	
FY2018/19	19 (1.47%)	57 (5.22%)	1014 (92.94%)	1 (0.09%)	0	1091	
Total	3728	2807	1808	706	738	9787	

Table showing the current status (July 2020) of permitted dwellings by financial year from 2012/13 to 2018/19.



Graph showing the number of signed planning performance agreements, preapplication requests and submitted applications for schemes proposing a net gain of 10 or more dwellings for the financial years 2015/16 to 2019/20.

It also shows the number of applications with a net gain of 10 or more dwellings that were approved or refused in each financial year. NB: Some of these applications may have been submitted in the previous financial year.

What steps have already been taken to encourage more homes to be built in Camden?

- Encouraging pre-application meetings and Planning Performance Agreements for major applications.
- Camden Design Review Panel The purpose of the Panel is to improve the quality of buildings and places for the benefit of the public. The panel is made up of 26 independent professionals from different architectural fields.
- Heads of Planning This is an internal working group set up to discuss key policy documents and major development schemes.

Matters relating to scale, massing, potential uses and capacities are discussed during these meetings. During the 'meeting' participants actively try to ensure that the development/s being discussed are making the most efficient use of the land while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Community Infrastructure Levy

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

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

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

Camden collects 2 types of Community Infrastructure Levy: the Mayoral CIL and the Camden CIL.

What steps have already been taken to encourage more homes to be built in Camden?

Revised Camden CIL rates:

In 2019, the Council consulted on plans to increase the rates in Camden for offices, research and development, and hotel uses in Central London. Residential rates were only subject to a small increase in line with building cost inflation. This rate change should help to encourage additional house building in the borough by making the development of alternative uses less favourable.

These proposed changes were subject to an Examination in Public during 2020 – with a virtual hearing via Zoom in May. The report concluded that the revised rates will not put the majority of developments at risk, and it could therefore be recommended for approval. It is anticipated that the revised schedule will be adopted by the Council later this year.

Belivering new homes in Camden

Potential delivery issues

Camden is a relatively built up borough in the inner London area and there are almost no greenfield site opportunities – other than some small scale infill sites on existing estates which means that the vast majority of new development takes place on brownfield sites that are already in some form of use.

Developing a brownfield site generally means that the initial site preparation stage of a development will take longer as existing uses may need to moved to an alternative site/or a different part of the site to enable preparation works including partial/full demolition of buildings to take place.

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
FY 2014/15		9	10	39			8	27	211	98	90	29	-1					520
FY 2015/16				1		14	15	39	16	410	277	106	92					970
FY 2016/17				14		1	1	3	2	264	328	349	213	85				1260
FY 2017/18	16			5					17	8	329	348	98	92	28			941
FY 2018/19					1	1	1	4	9	4	71	294	357	59	6	19	1	827

Table showing the year in which dwellings completed between 2014/15 and 2018/19 2016 received planning permission.

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

The initial decision to develop the land was made in 1996 by London & Continental Railways Limited and Excel (now DHL) and they appointed Argent as a development partner in 2001. In 2006 outline planning consent was granted with early infrastructure works starting on site in June 2007.



The majority of development sites in Camden are small sites less than 0.25ha and although there are some larger scale development opportunities

in the borough these tend to be relatively complicated to plan for and deliver. Resulting in much longer lead in times and extended build our programmes.

Land in multiple ownerships

Assessment of

ground conditions

and underground

obstacles

Competing development pressures

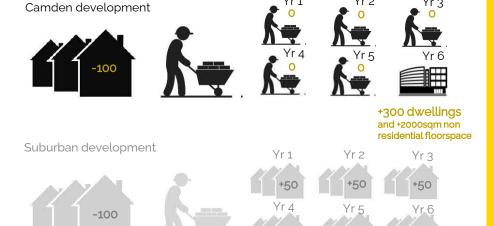
Consideration of heritage issues

Need to respond to surrounding uses including rail infrastructure

Decant strategies and site clearance issues

Potential challenges for larger scale development sites in Camden. Some of these challenges will also relate to smaller sites too.

In Camden, a considerable proportion of new dwellings permitted are flats and will often come forward as part of a mixed use development scheme. This type of development model means that new dwellings within these schemes will not be marked as complete until the development as a whole is completed – which depending on the nature of the development may take several years. In a more suburban context development tends to come forward in a more phased way with completions more evenly spread out over a number of years.



What steps have already been taken to encourage more homes to be built quicker in Camden?

Construction Management Plans:

As a dense, urban borough, construction activities can have significant impacts on surrounding communities. This is particularly in relation to impacts on roads, noise and air quality. Where appropriate, Camden requires developers to prepare a Construction Management Plan (CMP). This can help reduce the impact of construction, both for construction on site and the transport arrangements for servicing. Having a CMP in place reduces the risk of work on site having to be paused as a result of complaints from nearby businesses and/or residents

Community Investment Programme

During a period of reduced Central Government funding, Camden has been able to continue raising money using our limited borrowing, small grants and by building homes for sale. This has allowed us to build new council homes and community assets putting us at the forefront of the renaissance of council house building.

Since 2010 Camden's Community Investment Programme (CIP) has delivered 880 homes across all tenures – including 198 additional council homes, 163 replacement homes which better meet the needs of residents, 441 market homes and 78 intermediate affordable homes for key workers with a further 90 programmed to follow.

In addition, the programme has also delivered three new school buildings, two community centres and refurbished two homeless hostels.



Market uncertainty and slightly reduced house prices in recent years have reduced CIP's projected financial returns but overall the programme remains viable. Our robust governance processes ensure that scheme viability is assessed at all key stages and our long term programme allows us to be flexible in the face of market changes.

Whilst it is difficult to make like for like comparisons with other local authorities that have adopted different approaches to development the available data shows that CIP has put Camden

at the forefront of London Borough house builders at the same time as allowing the council to invest heavily in new and improved school buildings and other facilities.



What steps have already been taken to encourage more homes to be built in Camden?

The next phase of CIP sees Camden embarking on its most ambitious estate renewal and regeneration plans yet. At Cabinet in July 2019 approval was given to proceed to the next stage – the development of a viable business case – for the regeneration of the West Kentish Town Estate in Haverstock, and the Wendling Estate and St Stephen's Close in Gospel Oak, as well as the mixed-use regeneration of council-owned sites at Camley Street. Our ambition for the West Kentish Town and Wendling Estates is to provide over 1,500 new and replacement homes, of which at least 40% will be genuinely affordable.

4. Next Steps

Key actions going forward	Timescale/deadline	Responsibility
Explore opportunities to use technology to monitor housing delivery and predict future completions more effectively.	2020/21	LB Camden Planning and IT Services
Continue to progress the review of both the Site Allocations Local Plan and the Euston Area Plan.	2020/21 to 2022/23	LB Camden Planning Service
Review indicative capacities for development sites within emerging plan documents.	2020/21	LB Camden Planning Service
Use existing relationships and networks with landowners, developers and agents to gather market intelligence and identify potential barriers/challenges to housing delivery.	Quarterly	LB Camden Planning Service
Ensure that the planning service is suitably resourced (including specialists) so that comprehensive advice can continue to be provided in a timely way throughout the pre-application and planning application process	Ongoing	LB Camden
Continue to make the case to the Government for greater support and funding to enable more local authority led house building.	Ongoing	LB Camden

Making the case for greater support

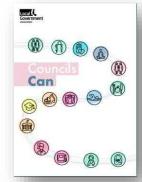
Camden have a considerable amount of retained receipts from Right to Buy (RTB) but because of time limit restrictions over half of this will need to be spent this year which will not be possible. We also have additional funds in the GLA RTB ring fence.

If the Government lifted restrictions on time limits and use it would allow the Council to inject much needed funds into our programme at no extra cost to Government.

Greater support from government would not only allow us to accelerate delivery of new homes and community facilities and environmental retrofit of existing homes but it will also support the UK construction industry, helping to avoid repeat of 2008 loss of workforce.



Councils are uniquely placed to deliver more new homes than the country has seen in a generation. Since lifting the Housing Revenue Account (HRA) borrowing cap in 2018, 94 per cent of housing stockowning councils have said they will use the new powers to accelerate or increase their housebuilding programmes ...



Council housebuilding is the only way to boost housing supply, help families struggling to meet housing costs, provide good quality homes to rent...



Extract from the 'Councils Can' conference paper produced by the Local Government Association in July 2019

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