

London Borough of Camden Housing Delivery Test - Action Plan

August 2021

Between 2017/18 and 2019/20 –

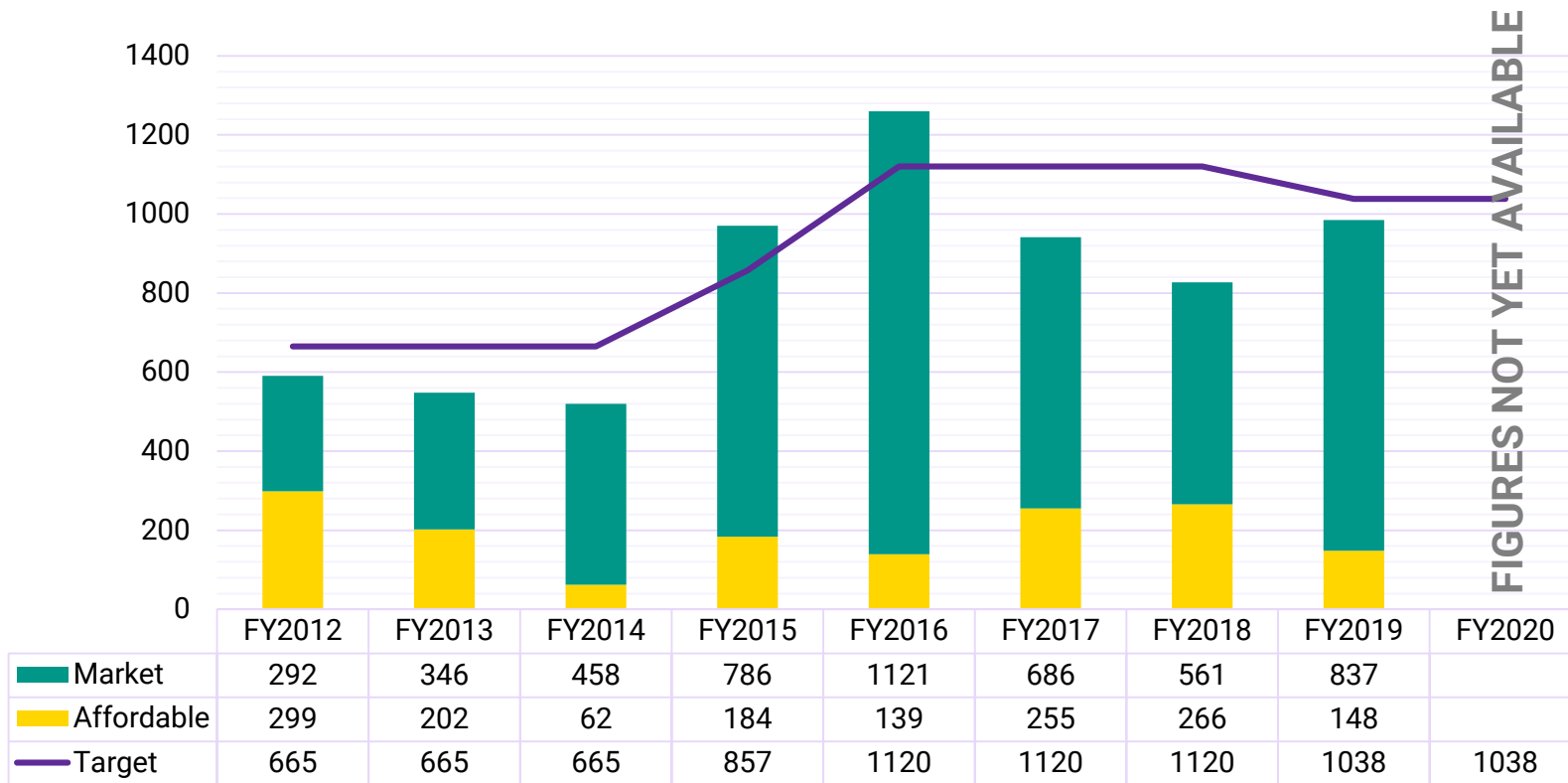
We had a target of
3265 new homes to
be built in Camden.
2568 were
delivered.



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 2020, the measurement for Camden was **79%*** - which means that Camden has to produce an action plan and apply a 20% buffer to our 5 year housing land supply.

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

*proportion of homes delivered compared to the target



This graph shows the total number (net) of self-contained dwellings completed between 2012/13 and 2019/20. This has then been broken down to show how many market and affordable units were delivered in each financial year. Figures for the 2020/21 were not available at the time that the action plan was published.

Format of the action plan



1. Understanding Camden

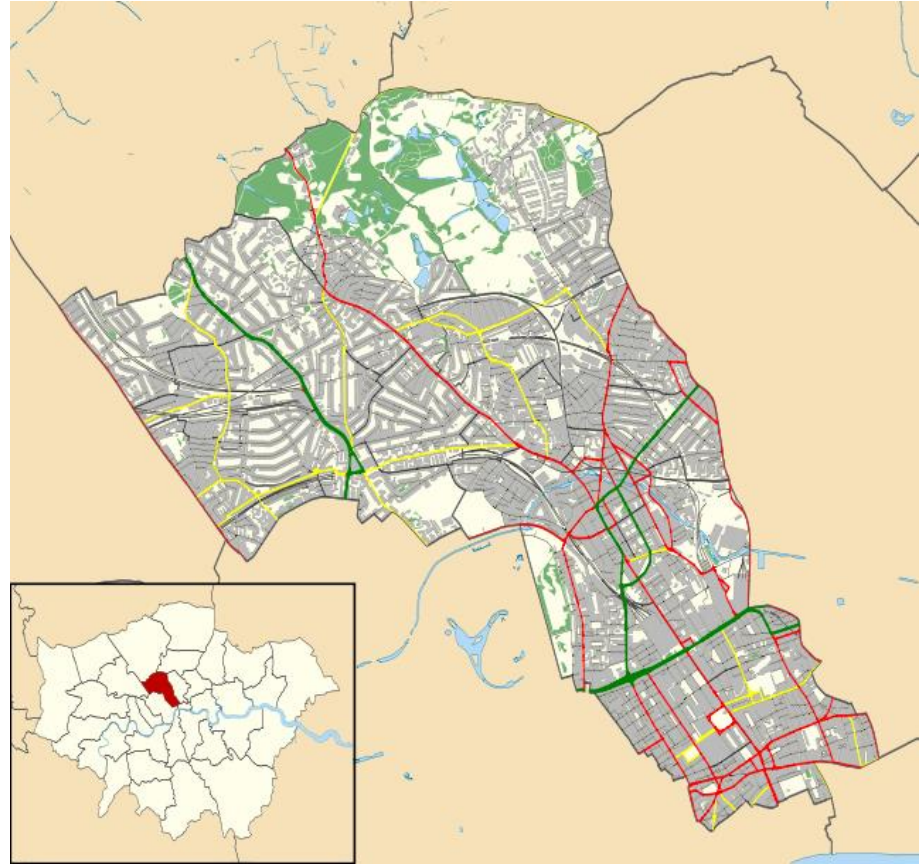


Camden to be a better
borough – a place
where everyone has a
chance to succeed
and where nobody
gets left behind.

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, as well as areas of relative deprivation.

Camden has a resident population of approximately 270,000. Camden has the 6th largest population churn in the UK, due to large migration in and outflows. In the year to mid-2019, ONS estimates total migration inflow to Camden of 40,700 people, a total outflow of 34,300, with the net effect of an additional 6,400 people. A sizeable proportion of movement is the annual transfer of students to/from Camden, both international and within the UK.



Camden is a very attractive place to live, which in turn has an impact on the cost of living. The cost of housing in Camden is amongst the highest in the country. The average (mean) house price in Camden in September 2020 was £813,155 – 3.2 times the average price for England & Wales and 1.6 times the average price for London – but down from peaking at £894,898 in July 2019. As a result, affordable housing is often cited in Camden's residents' surveys as the factor most in need of improvement in the borough.

On 1 June 2021 there were 6,363 households on the Council's Housing Register of which 66% are showing as living in overcrowded conditions and 5% are showing as severely overcrowded.

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

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

Camden has one of the most dynamic economies in the UK and is home to a number of global businesses and academic/public institutions. Camden is home to the second highest number of businesses in London after Westminster and is 3rd highest in the UK. There were 36,805 enterprises registered in Camden in 2020, a 2% increase on 2019 and has grown 52% since 2008.



Knowledge Quarter Innovation District and key development sites

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

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

Camden's role as a key employment destination and as home to Knowledge Quarter Innovation District means that when larger development sites come forward in the borough there is pressure from developers for those sites to be used as employment land.

Camden has a rich architectural heritage, almost 50% of the land area falls within a conservation area, recognising their architectural or historic interest and their character and appearance. In addition to the large number of heritage assets there are over 280 designated public and private spaces. These spaces are critical to sustainability and wellbeing providing places to relax, socialize, enjoy sport and take part in physical exercise.

CONSERVATION AREAS &
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

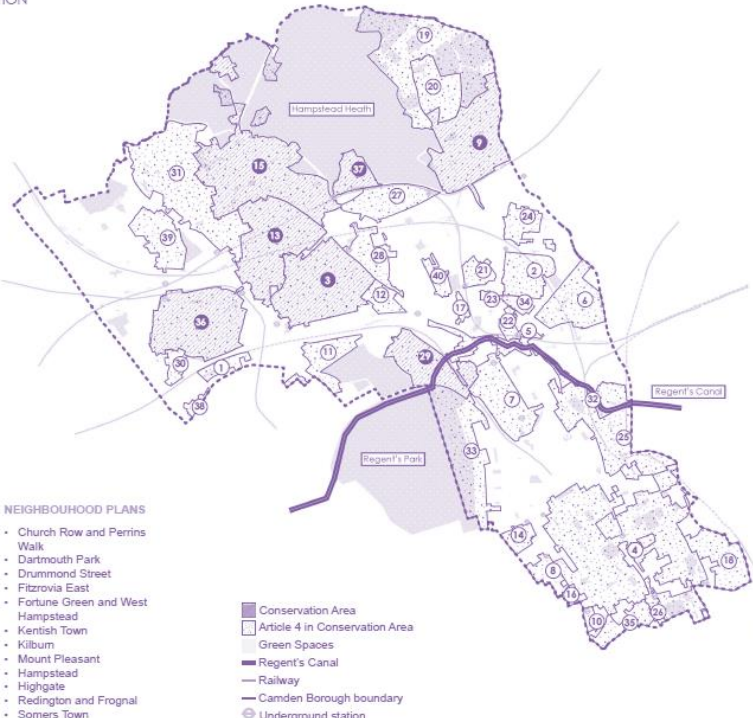
- Conservation Area
- Conservation Area with Article 4

- Alexandra Road Estate
- Bertholmew Estate
- Besize
- Bloomsbury
- Camden Broadway
- Camden Square
- Camden Town
- Charlotte Street
- Dartmouth Park
- Denmark Street
- Elsworth
- Elton
- Fitzjohns/Netherhall
- Fitzroy Square
- Hampstead
- Harway Street
- Harwood Street
- Hatton Garden
- Highgate
- Holly Lodge Estate
- Inkerman
- Jeffreys Street
- Kelly Street
- Kentish Town
- Kings Cross/ St. Pancras
- Kingsway
- Mansfield
- Parkhill and Upper Park
- Primrose Hill
- Prory Road
- Redington/Frogna
- Regent's Canal
- Regent's Park
- Roochester

35. Seven Dials Estate
36. South Hampstead
(formeley Swiss Cottage)
37. South Hill Park Estate
38. St. John's Wood
39. West End Green
40. West Kentish Town
- Article 4**
9. Only for no. 33 York Rise
13. Only for the Cottage no.
37. Only for nos. 32-66 (even)
and 72-90 (even) South Hill
Park.
67 Fitzjohns Avenue

NEIGHBOUHOOD PLANS

- Church Row and Perrins Walk
- Dartmouth Park
- Drummond Street
- Fitzrovia East
- Fortune Green and West Hampstead
- Kentish Town
- Kilburn
- Mount Pleasant Hampstead
- Highgate
- Redington and Frogna
- Somers Town



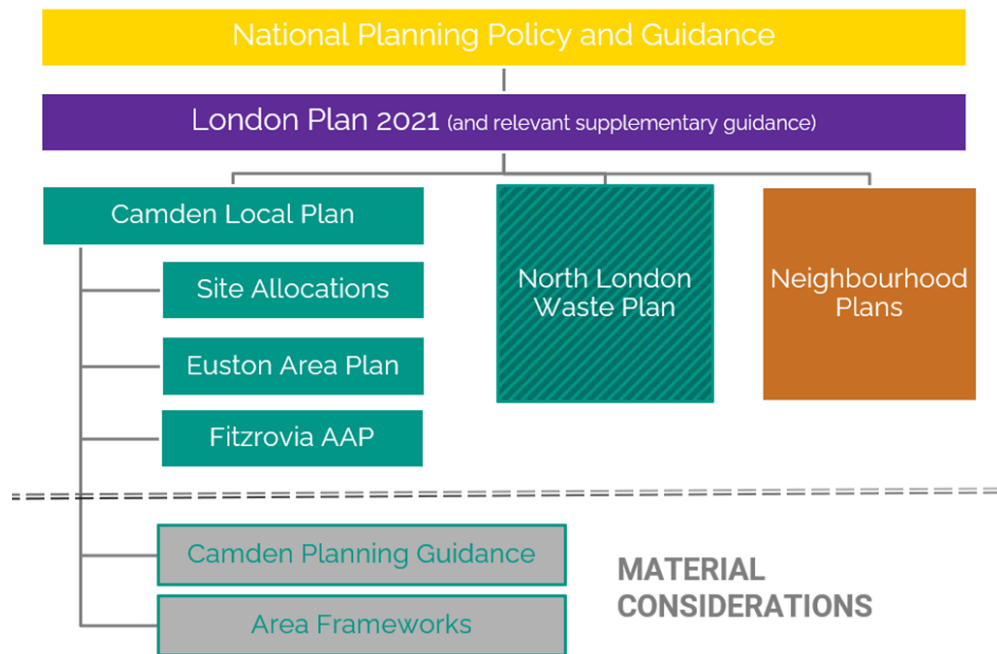
Camden also has large areas of Metropolitan Open Land (MOL) which is important to the whole of London, as well as the Borough, and provides attractive, visual breaks to the built-up area, keeping land permanently open. This designation is broadly equivalent to the Green Belt.

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

2. Planning in Camden



Camden's Development Plan



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

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

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

There are also currently 5 made Neighbourhood Plans in the borough and 2 which have successfully passed the referendum stage and are due to be approved by the Council in the Autumn.

Camden Local Plan 2017

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

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

There is a legal requirement for all policies in local plans and spatial development strategies to be reviewed at least once every five years to assess whether they need updating, and to then update them as necessary. The assessment should include consideration of changes to local circumstances and national policy. The Council will be undertaking an initial assessment of policies within the adopted Local Plan in late 2021 with work on a partial or full review of the Plan is anticipated to start in early 2022.

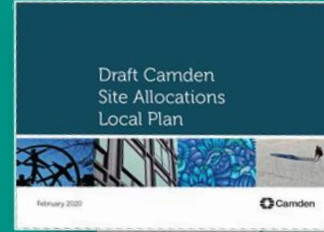


The Council has adopted a suite of supplementary planning documents alongside the Local Plan. These documents set out further detail about how the policies in the Plan should be applied. In January 2021 the Council updated the Camden Planning Guidance document for Housing. The update increased Payment in Lieu (PiL) rates for offsite affordable housing and market housing (Policies H2 and H4) and provided more flexibility for off-site provision to reduce reliance on PiL. It also reaffirmed our approach to deferred contributions (unless referred to GLA).

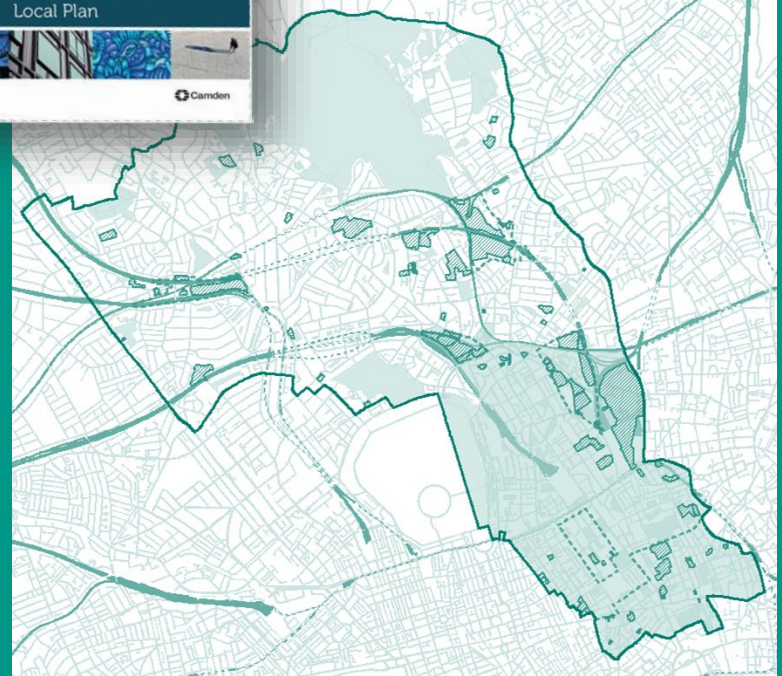
Site Allocations Plan Review:

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

In preparing the Site Allocations Local Plan the Council identified and assessed over 220 sites. We decided to undertake a staged assessment of these sites to ensure that we would only need to do a more detailed analysis of sites which had the most amount of development 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. The majority of sites discounted through the assessment process had either recently been developed (or were due to be completed soon) or they had an anticipated capacity (net gain) of less than 10 residential units or a 1000sqm employment floorspace.



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



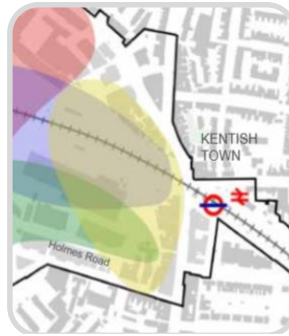
In total the plan identifies land for over 10,000 new homes (although it should be noted that some of the allocated sites in the plan already have planning permission).

Area Frameworks

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

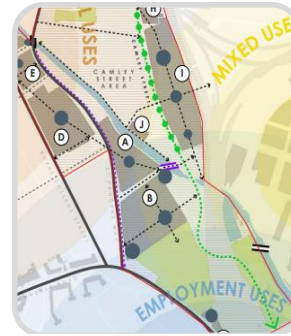
These frameworks set out a range of design/planning principles and infrastructure requirements. Local stakeholders such as residents, businesses and landowners are/have been involved in the preparation of the framework documents to ensure that principles set out within them are appropriate.

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



Kentish Town Planning Framework

- Adopted in July 2020
- Now a material planning consideration
- Murphy's submitted a planning application for the redevelopment of their site (land to the north of the railway) at the beginning of July 2021.



Canalside to Camley Street SPD

- Consultation on draft SPD Summer/Autumn 2020
- The consultation website was visited over 1,000 times with 370 contributions (total)
- Single Member Decision on the final version planned for Autumn 2021.



Gospel Oak to Haverstock Community Vision

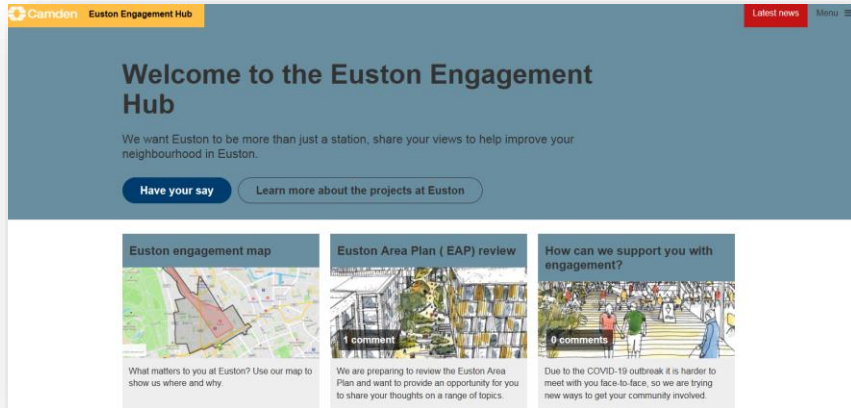
- Early engagement kicked off in autumn 2020 - consultation website was visited over 2000 times and over 400 individuals providing a response.
- Gospel Oak and Haverstock Neighbourhood Assembly (30 members)
- Consultation on Draft Vision planned for Autumn 2021



West End Lane to Finchley Road SPD

- Consultation on draft SPD February-April 2021
- The consultation website was visited over 3,500 times with over 500 contributions
- Single Member Decision on the final version planned for Autumn 2021.

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

Decision making in Camden

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

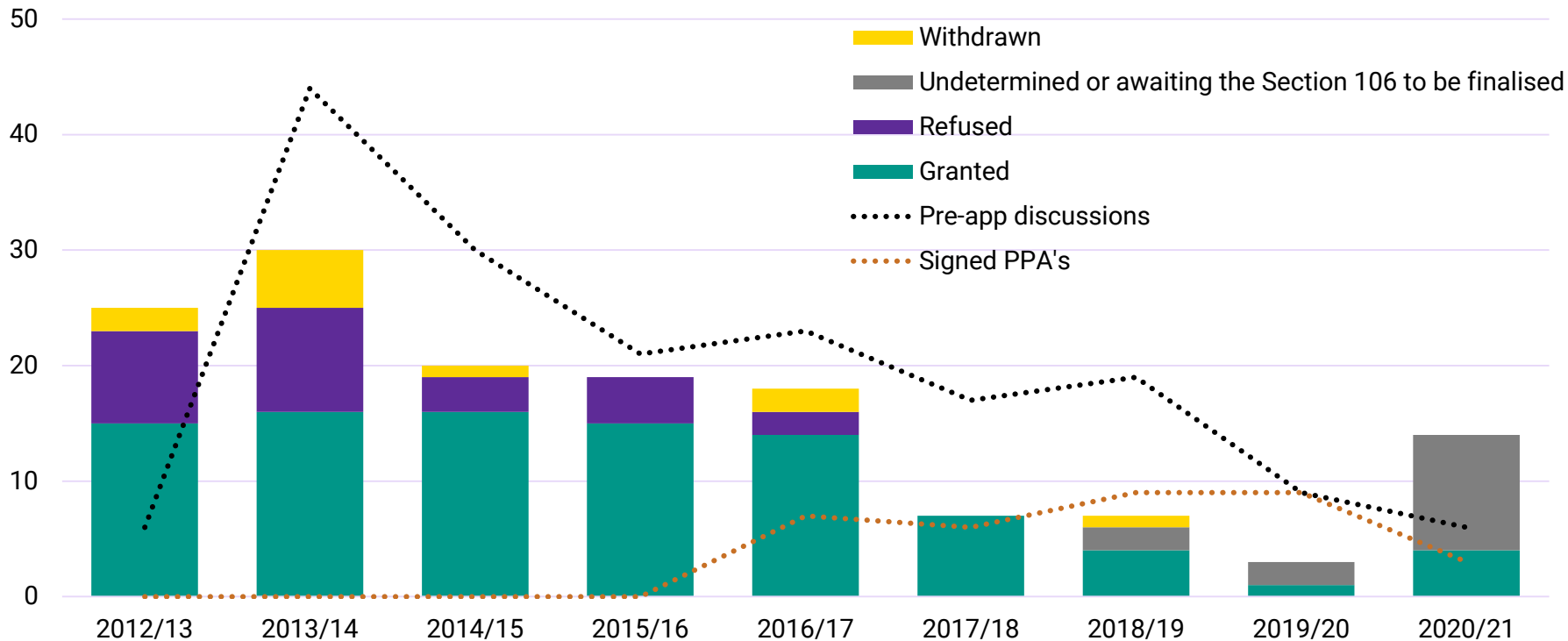
Throughout the Covid-19 pandemic the Planning Service has worked hard to ensure that applications can continue to be determined and that pre-application discussions can still take place - including the use of video conference software to host planning committees and design review panels.

Applications during the start of the pandemic slowed slightly but are now back to normal levels with 906 applications received in quarter 1 of the 2021/22 financial year. This compares with 751 received in quarter 1 of the 2020/21 financial year.



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





This graph shows the number of submitted applications, pre-application discussions and signed planning performance agreements (PPA's) for schemes that proposed a net gain of 10 or more dwellings between 2012/13 and 2020/21. The graph shows that in the last few years there has been an overall reduction in the number of submitted applications and pre-application discussions in schemes of this type. It also shows that no schemes of this nature have been refused in the last 4 years. This is mostly likely a result of an effective pre-application process including the use of Development Management Forums which allow developers to present their proposals to local residents, businesses and organisations. Whilst also allowing planning officers to hear from you what the stakeholders think about the proposal first hand.

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 accommodation¹ coming forward in the borough and a handful larger residential applications being taken forward by the Councils Community Investment Partnership (CIP) team. ¹ Historically student units used to equate to one dwelling in terms of delivery calculations but this has now changed. The current calculation is 2.5 non-self contained units = 1 dwelling.

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

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

	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
FY2019/20	180	1038*	-858
FY2020/21	476	1038	-562
Total	9787	6212	

This table shows how the total number of units permitted (net) compares with the annual housing target for that year. *This target is the 2021 London Plan ten year target divided equally over the ten years

Planning obligations

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

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

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

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.



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

Having the right infrastructure provided at the right time is essential to supporting additional housing and ensuring that existing residents see the benefit of additional housing. Camden CIL is essential in helping to facilitate these infrastructure improvements. In 2019 the Council undertook a consultation exercise to determine local spending priorities for CIL - over 560 responses were received.

3. Delivering new homes



Potential delivery issues

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



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

Case Study

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.

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



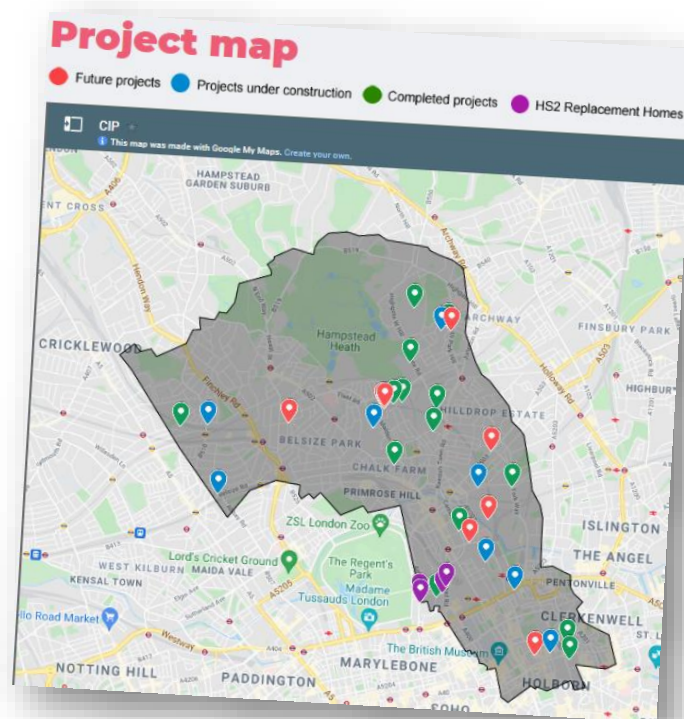
Community Investment Programme

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

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



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



To date we have built 975 new homes through CIP and have another 324 under construction and planning permission and cabinet approval for a further 1,000 homes.

We're also developing proposals on other sites with potential for another 2,000+ homes including two estates where we are working with residents on options. In 2020 we held our first estate resident ballot at West Kentish Town with 93% of residents voting in favour of proposals to redevelop the estate.

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

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

Camden Living Rent homes

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



4. Conclusions/Next steps



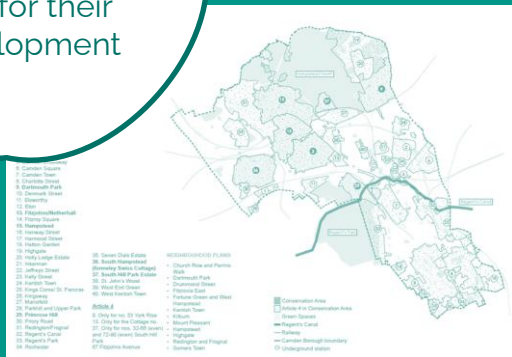
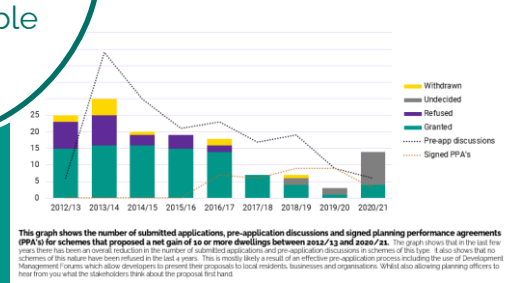
Main barriers to housing delivery in Camden

Competition for land against other more profitable land uses

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

Availability of sites and scope for their redevelopment

Length of time taken for applications for larger scale (strategic) development sites to come forward



Key actions going forward	Timescale/deadline	Responsibility
Resist applications for commercial developments outside of the Central Activities Zone, Knowledge Quarter and designated town centres	Ongoing	LB Camden Planning Service
Review indicative capacities for development sites within emerging plan documents.	August 2021	LB Camden Planning Service
Explore opportunities to use technology to monitor housing delivery and predict future completions more effectively.	December 2021	LB Camden Planning and IT Services
Continue to progress the review of both the Site Allocations Local Plan and the Euston Area Plan.	Ongoing	LB Camden Planning Service
Use existing relationships and networks with landowners, developers and agents to gather market intelligence and identify potential barriers/challenges to housing delivery.	Quarterly	LB Camden Planning Service
Ensure that the planning service is suitably resourced (including specialists) so that comprehensive advice can continue to be provided in a timely way throughout the pre-application and planning application process	Ongoing	LB Camden
Continue to make the case to the Government for greater support and funding to enable more local authority led house building.	Ongoing	LB Camden
Explore opportunities to use our compulsory purchase powers as a way to accelerate the delivery of key housing sites.	Ongoing	LB Camden

Planning Policy and Implementation

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