London Borough of Camden Housing Delivery Test - Action Plan

November 2024



Introduction

The Housing Delivery Test (HDT) was introduced by the government in 2018. It is an annual measurement of housing delivery in a local planning authority area.

The latest HDT results were published in December 2023 after a brief delay. These show that 1981 new homes were delivered in Camden between 2019/20 and 2021/2022 against a target of 2891 new homes. This gives Camden a HDT measurement of 69% when comparing the proportion of new homes delivered against the target.

This means that Camden has to produce an action plan and apply the presumption in favour of sustainable development as set out in the National Planning Policy Framework. This is Camden's fourth Housing Delivery Test Action Plan, with previous versions published in 2020, 2021 and 2022.

This action plan identifies the main issues that have affected housing delivery rates in Camden 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.



This graph shows the total number (net) dwellings completed between 2016/17 and 2023/24.

Format of the action plan

1. Understanding Camden

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

2. Planning in Camden

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

3. Delivering new homes

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

4. Review and next steps

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

1 Understanding Camden





The Council's vision is for "Camden to be a better borough – a place where everyone has a chance to succeed and where nobody gets left behind."

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

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

- Increasing the supply of genuinely affordable, family-sized, and social rented homes by building as many as we can ourselves;

Using all our powers to compel and facilitate more organisations to deliver more affordable, high-quality, family size housing in Camden;
Focusing our social housing resources to support those most in need in Camden, addressing overcrowding and improving people's health and wellbeing; and

- Reducing rough sleeping by investing in homelessness prevention, outreach and a "housing first" model – continuing to buy back our council homes to house homeless residents.

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

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

The 2021 Census shows that Camden had a resident population of 210,100, with the ONS mid-2022 projections estimating the resident population to be higher at 218,000. Camden has the 6th largest population churn in the UK, due to large migration in and outflows. A sizeable proportion of movement is the annual transfer of students to/from Camden, both internationally and within the UK.



Camden is a very attractive place to live, which in turn has an impact on the cost of living. House prices in Camden are amongst the highest in the UK. The median house price in Camden being £880,889 in 2023 – almost 3 times the average price for England & Wales and 1.6 times the average price for London. As a result, affordable housing is often cited in Camden's residents' surveys as the factor most in need of improvement in the borough.

At the start of December 2023 there were 7,635 households on the Council's Housing Waiting List for social housing. This figure is a 9% increase on 2022.

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

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

Camden has one of the most dynamic economies in the UK and is home to many global businesses and academic/public institutions. Camden is home to the second highest number of businesses in London after Westminster and is third highest in the UK after Westminster and Birmingham. There were 38,420 businesses in Camden in March 2023, an increase of 255 (0.7%) on 2022. Camden accounts for 6.6% of all London local (business) units.



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 was the 4th largest contributor to GVA in London in 2021, contributing 7% of London's GVA and 1.7% of national (UK) GVA.

Geographically, 61% of jobs are located south of Euston Road; almost a quarter (23%) are concentrated in the central Camden Town/ Euston/Regent's Park/Somers Town areas, while the remainder of Camden's jobs (16%) are scattered across town centres and employment sites in north and west Camden including Hampstead, Kentish Town and Swiss Cottage.

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



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

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

2. Planning in Camden

Camden's Development Plan



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

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

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

Camden Local Plan 2017

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

The Plan also sets out a series of ambitious policy requirements to encourage additional homes to be provided as part of mixed use schemes and maximise the number of affordable homes being provided in the borough. Policy H2 for example requires 50% of all additional floorspace over 200sqm to be developed as self-contained housing where it meets set criteria within the Central London Area and designated centres. There is a legal requirement for all policies in local plans and spatial development strategies to be reviewed at least once every five years to assess whether they need updating, and to then update them as necessary. Given this, the decision was taken in 2022 to progress a review of the 2017 Camden Local Plan and to incorporate the site allocations from the draft Site Allocations Local Plan into the new Local Plan, with the aim of taking a more holistic and place-based approach.



The Council has adopted a suite of supplementary planning documents alongside the Local Plan. These documents set out further detail about how the policies in the Plan should be applied. In March 2022 the Council adopted a Planning Statement on the Intermediate Housing Strategy

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

The Local Plan Review

The draft new Camden Local Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this.

The Plan includes a target to deliver 11,550 additional homes over the plan period to 2041 and it is envisaged that this will be met through existing permissions for committed schemes, site allocations and windfall development.

Once adopted the new Local Plan will replace the current Camden Local Plan (2017) and part of the Camden Site Allocations (2013), with the rest of the Camden Site Allocations (2013) being replaced by the updated Euston Area Plan.

The draft new Local Plan (Regulation 18) can be viewed on the Council's website: Draft new Local Plan - Camden Council

Draft New Camden Local Plan

Regulation 18 Consultation Version January 2024



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 following extensive community engagement.
 A material planning consideration



Canalside to Camley Street SPD

>Adopted as an SPD in Nov 2021 following extensive community engagement.

≻A material planning consideration.



Gospel Oak to Haverstock Community Vision

>Adopted as an SPD in Nov 2022 following extensive community engagement..

≻A material planning consideration



West End Lane to Finchley Road SPD

>Adopted as an SPD in Sept 2021 following extensive community engagement.

≻A material planning consideration.

Euston Area Plan

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



Euston Area Plan Review:

The Euston Area Plan (EAP) is the key planning document for Euston. The plan was jointly developed by Camden Council, the Greater London Authority and Transport for London and adopted in 2015. The Council are currently reviewing and updating the Euston Area Plan. Further information is available on the Council's website: <u>Euston Area Plan</u>

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.

In quarter 1 of the 2023/24 financial year 755 applications and 83 pre-apps were submitted. This is generally consistent with the number of applications received in quarter 1 of 2022/23 - 775 applications and 76 pre-apps.

Over the past few years however there has been an overall decline in applications received, down from 906 applications in quarter 1 of the 2021/22 financial year. This is consistent with the national trend and may reflect the level of uncertainty in the economy at present. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should... work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

NPPF - Paragraph 38

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 buildings back into use. The amount to pay is the increase in floorspace (m2) multiplied by the rate in the CIL charging schedule.

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

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

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

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

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

Delivering new homes



Constraints to delivery

The number of new homes delivered in Camden has varied a lot over the last 10 years. However since 2016/17 there has been a general decline in the number of housing completions against Camden's housing target.

Key constraints to housing delivery in Camden include:

- Investors targeting life science, student housing (despite possible restrictions on foreign students), and hotels, which have high returns on investment.
- Developers have little interest in building homes even though it is the use with the greatest need, as commercially housing is viewed as being less profitable compared to other uses.
- Registered providers scaling back their new build programs due to focus on improving existing stock.
- High existing use values.
- Limited availability of land for development.
- Uncertainty and delays at Euston.
- Camden's position in the Central Activities Zone (CAZ), where the priority is to deliver CAZ uses (over housing).
- The character of the borough heritage constraints and viewing corridors.



Potential delivery issues

Camden is a relatively built-up borough in the inner London area and there are almost no greenfield site opportunities, 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.



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.

Through the programme we're building 4,850 new homes, including 1,668 council homes and 443 at genuinely affordable Camden Living rents/intermediate 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 as well as improving public open spaces.

To date we have built 1,520 new homes through CIP and have housed over 1,028 people, including 453 children. We have another 495 homes currently under construction and 1,014 within the approved pipeline.

CIP is also helping to fund improvements to 22,500 existing council homes as part of the Council's Better Homes Programme.



. Conclusions/Next steps



Main barriers to housing delivery in Camden

Competition for land against other more profitable land uses **Developers** don't want to build new homes in Camden as they aren't profitable

otal housing completions (net) against Camden's Housing Target



Availability of sites and scope for their redevelopment



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

Key actions	Timescale	Responsibility
Support the Community Investment Programme across DM, Planning Policy and Regeneration and Place to implement their ambitious programme of development in the borough	Ongoing	LB Camden Planning Service
Resist applications for commercial developments outside of the Central Activities Zone, Knowledge Quarter and designated town centres.	Ongoing	LB Camden Planning Service
Keep indicative capacities for development sites under review within emerging plan documents.	Ongoing	LB Camden Planning Service
Explore opportunities to use technology to monitor housing delivery and predict future completions more effectively.	Ongoing	LB Camden Planning and IT Services
Progress the review of the Camden Local Plan 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

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