#### **Submission Draft Camden Local Plan - Housing Trajectory 2026-2040** (May 2025)

The housing trajectory shows how sites are expected to come forward to meet the housing target proposed by the Submission Draft Camden Local Plan. For this purpose, the housing trajectory includes all self-contained and non-self-contained homes and covers the fifteen years of the Local Plan period – starting with 2026/27 and concluding with 2040/41.

The three figures included below collectively set out the different elements of the housing trajectory.

- Figure 1 provides a list of identified sites that are expected to deliver housing between 1 April 2026 and 31 March 2041, and indicates when we expect the housing to be delivered by each site. Figure 1 is divided into four lists of major development sites<sup>1</sup> expected to deliver self-contained housing (one for each sub-area of the borough), and four lists of all sites expected to deliver non-self-contained housing (one for each sub-area of the borough).
- Figure 2 provides the total amount of housing we expect to be delivered each year from 2026/27 to 2040/41 by the sites in Figure 1, adds the anticipated housing delivery each year from smaller (non-major) developments of self-contained housing, then compares this with the Local Plan housing target in various ways to provide the data in the housing trajectory chart. For information, Figure 2 also includes a column at the start providing the anticipated position on 31 March 2026 in terms of the borough's progress towards meeting the borough housing target for 2019/20 to 2028/29 set by the London Plan 2021.
- Figure 3 presents the housing trajectory as a chart, comparing the housing we expect to be delivered each year with the annualised London Plan housing target (up to 2028/29), the remaining annualised Local Plan housing target (from 2029/30), the cumulative backlog or surplus arising each year, and the "managed delivery target" (the housing that would need to be delivered for each remaining year of the Plan period for the Local Plan target to be met in full).

<sup>1</sup> Major development in the context of the London Borough of Camden is development involving 10 homes or more, or the provision of building(s) with a floor area of 1,000 sqm or more.

# Figure 1. Submission Draft Camden Local Plan - Housing Trajectory 2026-2040 – List of Sites (includes self-contained and non-self-contained homes)

	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
	202	202.	202	202	203(	203	203;	203:	203	203	203(	203.	203	203	204(
South sub-area (major self-contained)															
S2 Euston Opportunity Area															
S5 120-136 Camley Street															
S6 104-114 Camley St and Cedar Way															
S7 24-86 Royal College Street															
S8 St Pancras Hospital															
S9 Shorebase Access															
<b>\$10</b> Bangor Wharf and Eagle Wharf															
S11 Former RNTNE Hospital, 330 Gray's Inn Rd															
<b>\$13</b> Former Thameslink Station, Pentonville Rd															
S14 Land at Pakenham Street and Wren St															
S16 Fmr. St Martin's Coll, Southampton Row															
S17 166 High Holborn/ 1 Museum Street															
S19 Cockpit Yard and Holborn Library															
S20 York Way depot and Freight Lane land															
S21 Agar Grove Estate															
S22 6 St Pancras Way (Ugly Brown Building)															
S23 Tybalds Estate															
<b>S24</b> 294-295 High Holborn															
S25 156-164 Gray's Inn Road/ Panther Ho															
S26 8-10 Southampton Row															
S28 Central Somers Town Estate															

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	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
Central sub-area (major self-contained)															
C2 Regis Road and Holmes Road Depot															
C3 J.Murphy & Sons Limited															
C4 Kentish Town Police Station, Holmes Rd															
C5 369-377 Kentish Town Road (Car Wash)															
C6 Kentish Town Fire Station, Highgate Rd															
<b>C7</b> Morrisons Supermarket (note: 110 homes expected to complete 2025/26)															
C9 100, 100a and 100b Chalk Farm Road															
C10 Juniper Crescent Estate															
C11 Network Rail land at Juniper Crescent															
C12 Gilbey's Yard, Camden Town															
C13 West Kentish Town Estate															
C15 Wendling Estate and St Stephens Close															
C17 Camden Town over-station development															
C19 Arlington Rd / Jamestown Rd former depot															
C21 Grand Union Ho, 18-20 Kentish Town Rd															
C22 Heybridge Garages, Hadley Street															
C23 Bacton Low Rise, Haverstock Road															
<b>C24</b> 52-54 Avenue Road															
C25 5-17 Haverstock Hill															
C26 160A Malden Rd (service station/ car wash)															
Unallocated sites (approved or with resolution to approve)															

	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
West sub-area (major self-contained)															
W2 02 Centre, Car Park, Showrooms															
W3 11 Blackburn Road															
W4 13 Blackburn Road															
<b>W5</b> 188-190 Iverson Road															
W6 Meridian House, 202-204 Finchley Road															
W7 Gondar Gardens Reservoir															
<b>W8</b> 88 – 92 Kilburn High Road															
W9 Land at Midland Crescent, Fichley Road															
W10 BP Petrol Station, 104A Finchley Road															
W12 100 Avenue Road															
Unallocated sites (approved or with resolution to approve)															
North sub-area (major self-contained)															
N2 Former Mansfield Bowling Club															
N3 Queen Mary's House, 124 Heath Street															
N4 Hampstead Delivery Office															
Total major self-contained (all sub-areas)	384	581	734	924	732	783	830	705	631	580	529	571	703	685	649

	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
South sub-area (non-self-contained, C3 equiv)															
17-37 William Road															
Land at Stephenson Way (r/o 222 Euston Road)															
42 Phoenix Road NW1 1TA															
Central sub-area (non-self-contained, C3 equiv))															
C9 100, 100a and 100b Chalk Farm Road															
C14 Hawkridge House, Warden Road															
C16 Shirley House, 25-27 Camden Road															
C18 UCL Camden Campus, 109 Camden Road															
Camden Rd Hostel 248-250 Camden Road															
11-12 Ingestre Road, Kentish Town															
West sub-area (non-self-contained, C3 equiv)															
W9 Land at Midland Crescent, Finchley Road															
IQ Haywood House Student, Blackburn Road															
North sub-area (non-self-contained, C3 equiv)															
Chester Rd Hostel, 2 Chester Road															
Total non-self-contained (all sub-areas)	18.9	95.2	106.4	28.8	86.4			36	36						

### Self-contained and non-self-contained housing

Figures 1 and 2 distinguish between self-contained and non-self-contained housing.

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 relevant General Permitted Development Order (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).

Non-self-contained-housing (abbreviated as NSC in Figure 2) 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 etc). 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<sup>2</sup>.

#### **Major developments**

For self-contained housing, Figures 1 and 2 distinguish between major developments and smaller developments (non-major developments).

Sites where major development is expected (those that will involve 10 or more dwellings, or over 1,000 sqm gross internal area) have been assessed against the definitions of "deliverable" and "developable" provided by the National Planning Policy Framework 2024 (NPPF). All major development sites forming part of the trajectory are considered to be developable, and those sites included for the first five years (2026/27 to 2030/31) are considered to be deliverable.

With the exception of a handful of sites expected to deliver housing in the first five years of the Plan period, the major sites included in the housing trajectory are proposed as site allocations in the Submission Draft Camden Local Plan, and are included in Figure 1 below. These include:

- sites that were previously allocated or identified in one of our adopted development plans<sup>3</sup> and have yet to be fully built-out;
- sites that benefit from an unexpired planning consent, or are the subject of applications where there has been a resolution of Planning Committee to grant

<sup>&</sup>lt;sup>2</sup> Para 4.1.9 of the London Plan 2021 states (in part) - Net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Net non-self-contained accommodation for older people (C2 Use Class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home. All other net non-self-contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.

<sup>&</sup>lt;sup>3</sup> Camden Site Allocations 2013, Fitzrovia Area Action Plan 2014, Euston Area Plan 2015 and Camden Local Plan 2017

consent, but a legal agreement to secure planning obligations has yet to be completed; and

• sites that have been proposed to the Council by landowners and/ or prospective developers, for example through earlier consultations relating to local plan preparation (including 'call for sites' exercises carried out between late 2017 and late 2022).

We have estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications, or submitted in response to earlier consultations in relation to local plan preparation (including 'call for sites' exercises), along with our own assessments carried out as part of the preparation of the Submission Draft Camden Local Plan and earlier proposed plans<sup>4</sup>.

Please note that these estimates are based on the information currently available, and the rate of delivery may change up to and during the Plan period, depending on the financial climate, the relative costs and values associated with different types of development, and the way in which landowners and prospective developers respond to these factors.

#### Smaller developments (non-major developments)

The two published drafts of the Local Plan only allocate sites where major development is anticipated, and do not identify smaller sites. For each year of the Plan period, the housing trajectory includes a 'windfall' figure equal to the average annual number of homes completed as part of smaller developments (those providing fewer than 10 homes, or buildings with total floor areas below 1,000 sqm) from April 2010 to March 2020. The term 'windfall' describes development which is anticipated to arise on the basis of evidence of past housing delivery, but where specific development sites have not been identified.

<sup>&</sup>lt;sup>4</sup> The earlier proposed plans are the draft Camden Site Allocations Local Plan 2020 and the draft of the Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

# Figure 2. Submission Draft Camden Local Plan - Housing Trajectory 2026-2040 – Totals and Comparisons (includes self-contained and non-self-contained homes)

	2019/20- 2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
Major self-contained housing developments (allocations/ permissions)	3,489	384	581	734	924	732	783	830	705	631	580	529	571	703	685	649
Smaller self-contained housing developments (windfalls)	1,175	173	173	173	173	173	173	173	173	173	173	173	173	173	173	173
Non-self-contained (NSC) housing developments (allocations/ permissions)	-46	18.9	95.2	106.4	28.8	86.4	0	0	36	36	0	0	0	0	0	0
Total net additional C3 equivalent (self- contained and NSC housing)	4,618	575.9	849.2	1,013.4	1,125.8	991.4	956	1,003	914	840	753	702	744	876	858	822
Annualised Housing Target	1,038	1,038	1,038	1,038	703	703	703	703	703	703	703	703	703	703	703	703
Cumulative Housing Target to 2026	7,266															
Cumulative Housing Targe from 2026		1,038	2,076	3,114	3,817	4,520	5,223	5,926	6,629	7,322	8,035	8,738	9,441	10,144	10,847	11,550
Cumulative Completions from 2026		575.9	1,425.1	2,438.5	3,564.3	4,555.7	5,511.7	6,514.7	7,428.7	8,268.7	9,021.7	9,723.7	10,467.7	11,343.7	12,201.7	13,023.7
Monitor (cumulative completions minus the cumulative targets) – est. backlog 2026	-2,648															
Monitor (cumulative completions minus the cumulative targets) – from 2026		-462.1	-650.9	-675.5	-252.7	35.7	288.7	588.7	799.7	936.7	986.7	985.7	1026.7	1199.7	1354.7	1473.7
Managed delivery target (no of completions needed to be on track) – from 2026		770	783.9	778.8	759.3	726	699.4	670.9	629.4	588.8	546.9	505.7	456.6	360.8	103.2	-651.7

### Housing Target for the Submission Draft Camden Local Plan

The housing target is a key component of Figures 2 and 3.

The proposed Local Plan period is 2026/27 to 2040/41. A housing target for Camden running from 2019/20 to 2028/29 has been set by the London Plan 2021. As the Local Plan period continues for a further twelve years beyond 2028/29, a housing requirement has been set for the whole Plan period having regard to paragraph 4.1.11 of the London Plan<sup>5</sup>.

The Submission Draft Camden Local Plan includes a target to deliver a total of at least 11,550 additional homes over the plan period 2026/27 to 2040/41. The housing trajectory assumes that the current London Plan 2021 target for Camden will continue to apply from 1 April 2026 to 31 March 2029 (3,114 homes in total or 1,038 additional homes per year), and that a target of 8,436 homes in total (703 additional homes per year) will apply thereafter.

The housing target in the draft Local Plan is a capacity-based target, comprising all expected housing delivery over the Plan period (from sites with planning permission and allocated sites), including a windfall<sup>6</sup> allowance for smaller sites (non-major development). The target also reflects the delay associated with HS2 and development at Euston, assuming delivery within the Local Plan period of 875 homes from sites encompassed by the Euston Area Plan<sup>7</sup> (in addition to delivery from existing permissions). This compares with the target of 1,500 to 2,500 additional homes in the draft update of the Euston Area Plan published for consultation in January 2023.

As the target of 11,550 is capacity-based, it encompasses the cumulative backlog from under-delivery of completed homes from 2019/20 (the first year of the London Plan period) to 2025/26. At the time of calculation for the Regulation 18 draft Local Plan, we anticipated that the backlog would reach a little over 1,700 homes by April 2026.

Once adopted, the draft Local Plan will replace the site allocations in the Fitzrovia Area Action Plan (2014), and most allocations in the Camden Site Allocations Plan (2013). The remaining allocations will be replaced by the updated Euston Area Plan in due course. Consequently, the target of 11,550 includes allocations from those plans if they are not fully built-out and have been re-allocated by the draft Local Plan.

We note that the housing trajectory in the Camden Local Plan 2017 anticipated the completion by 2025/26 of housing development on several large sites where no housing delivery has yet taken place, including 24-58 Royal College Street (Parcelforce) and the O2 Car Park (both allocated in 2013). These effectively form

<sup>&</sup>lt;sup>5</sup> Para 4.1.11 of the London Plan 2021 states - If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.

<sup>&</sup>lt;sup>6</sup> The term 'windfall' describes development which is anticipated to arise on the basis of evidence of past housing delivery, but where specific development sites have not been identified.

<sup>&</sup>lt;sup>7</sup> We currently anticipate that 1,750 homes will be delivered within the boundary of the Euston Area Plan in addition to existing permissions, but only half will be delivered within the Local Plan period.

part of our backlog against the target set by the London Plan 2021, and are incorporated by the draft Local Plan into Allocations S7 and W2 respectively.

In late 2023 (when we calculated the housing target of 11,550 originally included in the draft of the Camden Local Plan published in 2024), we anticipated delivery of 11,650 additional homes from 1 April 2026 to 31 March 2041. The 'planned surplus' of 100 homes is broadly consistent with the position reached at public examination of the Camden Local Plan 2017, with the trajectory showing delivery of approximately 200 homes more the 2017 target of 16,800.

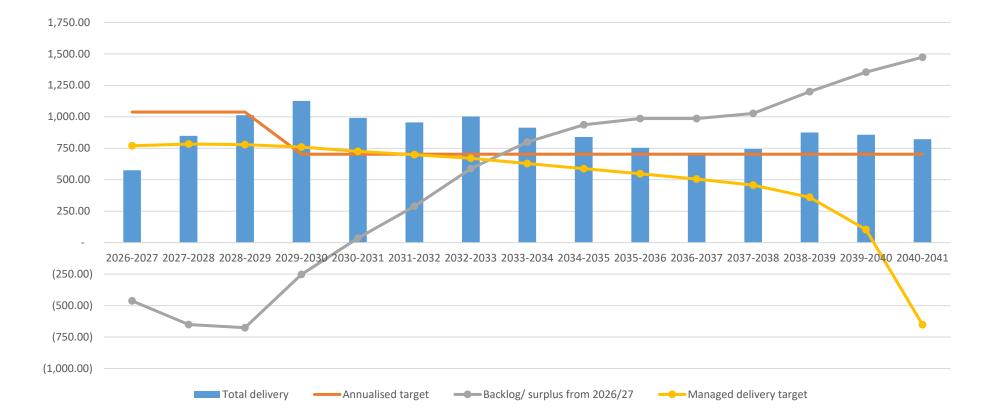
During preparation of the Submission Draft Local Plan, the capacity of several sites was re-assessed, and additional sites were allocated (the largest being York Way Depot and adjacent land at Freight Lane). This led to an increase of approximately 400 in the total capacity of sites in the housing trajectory. The overall estimated anticipated delivery shown by the trajectory is now approx. 13,000 additional homes from 1 April 2026 to 31 March 2041. However, due to delays in delivery of existing permissions (associated with changing fire safety requirements and increasing costs of construction), a large part of the increased delivery will be absorbed by an increase in the anticipated backlog from 2019/20 to 2025/26 by 950 homes to reach 2,650 homes.

As stated above, the housing trajectory assumes the target will remain at 1,038 additional homes per year for the first three years of the Plan period, and reduce to 703 additional homes per year for the remaining twelve years. At this stage, we have not sought to make-up the entire backlog in the early part of the Plan period by increasing the targets for the first five years, nor have we added a buffer<sup>8</sup> to the first five years, since the trajectory indicates that this additional early delivery simply would not be achieved.

As we progress towards public examination, we will continue to review the housing target, the division of the housing target across the Plan period, the absorption of the backlog, and the application of a buffer. We will take into account: ongoing housing delivery; the number of homes included in newly consented schemes; the latest information from applicants, landowners and other developers; the latest information available in relation to development associated with HS2, Euston Station, and the update of the Euston Area Plan; the financial climate affecting housing development and sales; the outcome of future calculations of the Housing Delivery Test (or its successors); information and guidance issued by the GLA; existing and new guidance emerging from the government; and guidance provided by the Planning Inspector once the examination process commences.

We note that the London Plan is currently being reviewed, and will result in a new capacity-based housing target for Camden. Once any new London Plan housing target for Camden is published in its final form, this will supersede the housing target in the new Camden Local Plan. The GLA are aiming to publish the new London Plan in its final form in 2027/28 (following examination in public), consequently the housing target included in the new Camden Local Plan housing target may only apply for a short period of time.

<sup>&</sup>lt;sup>8</sup> The NPPF 2024 indicates that the housing trajectory should add a buffer to the target for the first five years of the Plan period in the form of an additional supply of specific deliverable sites (moved forward from later in the Plan period). This buffer should either be 5% (where delivery in previous years has met targets) or 20% (where there has been significant under-delivery in previous years).



## Figure 3. Submission Draft Camden Local Plan - Housing Trajectory 2026-2040 - Chart (includes self-contained and non-self-contained homes)

#### Figure 3 outcomes

The line shown in orange in Figure 3 (labelled annualised target) shows the annualised target of 1,038 for the first three years (up to 2028/29) and the remaining annualised Local Plan housing target of 703 for the following twelve years (from 2029/30).

The line shown in grey in Figure 3 (labelled backlog/surplus) is the gap between cumulative targets and cumulative completions. This shows that cumulative completions will fall short of cumulative targets in the early years of the trajectory period (before 2030/31), but will exceed them in the later years. At its starting point in 2026/27, the grey line shows a backlog of approx. 450 homes arising from the gap between the annualised London Plan target of 1,038 and that year's anticipated delivery of approx. 575 additional homes. At the end of 2040/41, the grey line shows a surplus of over 1,450 homes compared with a cumulative target of 11,550 additional homes.

The grey line does not directly take account of under-delivery of the annualised London Plan target from 2019/20 to 2025/26, in the sense that it does not include that backlog within the 450 home backlog shown for 2026/27. Instead, the 11,550 target incorporates the London Plan backlog of 1,700 to 2025/26 as anticipated at the time the target was derived in late 2023.

As indicated above, the London Plan backlog to 2025/26 is now anticipated to be approx. 2,650 homes (an increase of 950). The surplus of over 1,450 homes shown for 2040/41 reflects the increase of 950 in the starting London Plan backlog, the planned surplus of 100 above the draft Local Plan target, and the increase of 400 homes arising from the re-assessment of site capacities and the additional site allocations involved in the Submission Draft Local Plan<sup>9</sup>. Overall, the trajectory confirms that we anticipate that the proposed housing target will be slightly exceeded by the end of the Plan period.

The line shown in yellow on Figure 3 (labelled managed delivery target) shows the number of homes that would need to be delivered each year for the remaining cumulative target to be met by the end of the trajectory period assuming delivery proceeds as anticipated. The managed delivery target does not take account of the higher London Plan target for the first three years of the trajectory, but is instead calculated by assuming the 11,550 housing target should be divided equally between the number of years in the trajectory<sup>10</sup>. Consequently, it is lower than the orange line (annualised target) for every year except 2029/30 and 2030/31. For 2040/41, the yellow line shows a negative managed delivery target of approx. 650 homes, which reflects the gap between the anticipated surplus of approx., 1,450 homes (grey line) and the sum of the annualised target of 703 homes (orange line) and the planned surplus of 100 homes<sup>11</sup>.

<sup>&</sup>lt;sup>9</sup> London Plan backlog increase 950 + planned surplus 100 + 400 increased capacities/ new allocations = 1,450

<sup>&</sup>lt;sup>10</sup> for 2026/27, the managed delivery target is the 11,550 housing target divided by 15 = 770; for subsequent years, it is the portion of the target that has not yet been delivered divided by the number of years remaining in the Plan period

<sup>&</sup>lt;sup>11</sup> managed delivery target 650 = anticipated surplus 1,450 - minus (annualised target approx. 700 + planned surplus 100)