

# London Borough Camden Statement on Matter 3: Meeting Camden's Housing Needs

Please note that where document references are included below, these relate to documents in the Council's examination library which is available to view on the [Council's website](#).

## Issue 1:

**Whether the Plan has been positively prepared and is underpinned by up-to-date and robust evidence, and whether it is justified, effective, consistent with national policy and is in general conformity with the London Plan in relation to meeting Camden's housing needs.**

1. **Is the overall quantity of new homes planned for Camden up to 2041 justified and consistent with national policy?**
  2. **The Plan sets a borough wide housing requirement of 11,550 new homes during the plan period. Is this justified? If not, what should the housing requirement be?**
- 1.1 This response seeks to address questions 1 and 2 above together. The overall quantity of new homes planned for Camden up to 2041 is considered to be justified and consistent with national policy and the borough wide housing requirement of 11,550 new homes during the plan period is considered to be justified.
  - 1.2 The London Plan, the Spatial Development Strategy for London, assesses the overall housing requirements for all of London, then allocates this in the form of specific targets for each local planning authority based on a Strategic Housing Land Availability Assessment (SHLAA).
  - 1.3 This process is clearly recognised by the NPPF (ND01) as follows:
    - paragraph 17 recognises that "strategic policies... can be contained in: a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred";
    - paragraph 20 confirms that strategic policies should make sufficient provision for homes;
    - paragraph 69 indicates that "Strategic policy-making authorities should establish a housing requirement figure for their whole area"; and
    - paragraph 72 confirms that "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment."
  - 1.4 The process is also described in paragraph 4.1.2 of the London Plan 2021 (RD01), which states:

"For the purposes of the Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The advantage of strategic planning is that it allows London to focus development in the most sustainable locations, allowing all of London's land use needs to be planned for with an understanding of how best to deliver them across the capital. Because of London's ability to plan strategically, boroughs are not required to carry out their own housing needs assessment but must plan for, and seek to deliver, the housing targets in this Plan. These have been informed by the SHLAA and the SHMA."

1.5 The housing targets set out in the London Plan 2021 are contained in Table 4.1, and cover the years 2019/20 to 2028/29. Table 4.1 provides a target of 10,380 additional homes for Camden, or 1,038 additional homes per year.

1.6 London Plan paragraph 4.1.11 advises that:

"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."

1.7 The Housing Topic Paper (TP10) explains how we have derived the housing target for Camden set out in the Local Plan with reference to London Plan requirements. In particular:

- paragraph 4.9 notes that the Local Plan's target of 11,550 additional homes assumes that the London Plan target of 1,038 homes per year will continue to apply for each of the three years from 2026/27 to 2028/29 (that is, the remaining period covered by the London Plan target);
- paragraph 4.2 notes that the Local Plan period continues for a further twelve years, and that housing requirements for the remainder of the period have been set having regard to London Plan 2021 paragraph 4.1.11;
- paragraph 4.7 confirms that the Council has explored the findings of the London Plan SHLAA (RD16) for the period 2029-2041, and found that these predominantly comprise development at Euston (covered by the Euston Area Plan), but that some approvals, allocations and potential development sites have been taken forward as site allocations in the Local Plan;
- paragraph 4.8 notes that the Council has carried out its own Housing and Economic Land Availability Assessment, and the outcomes of this in terms of site identification are explained in the Site Selection and Allocation Topic Paper (TP03);
- on the basis of the site identification exercise, paragraph 4.9 indicates that for the Plan period beyond the London Plan target (2029-2041), the Local Plan sets a target of 703 additional homes per year; and

- paragraph 4.10 confirms that "The housing target in the Submission 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) and including a windfall allowance for smaller sites (non-major development)."
- 1.8 The Council's Site Selection and Allocation Topic Paper (TP03) sets out how sites have been identified and allocated to establish overall capacity, including how indicative housing capacities for individual sites have been derived (section 9) and how the design-led process has been used to assess site capacity where this has not previously been considered through determination of a planning permission or an adopted supplementary planning document.
- 1.9 The Housing Trajectory and 5 Year Housing Land Supply Note (SD14) shows how sites allocated in the Local Plan fit into the overall supply of housing set out in the trajectory, and explains how it relates to the 11,550 housing target.
- 1.10 In the light of the elements of the NPPF and the London Plan 2021 quoted above in paragraphs 1.3 to 1.6 and the sources identified in paragraphs 1.7 to 1.9, the Council considers that the target included in the Local Plan for 11,550 additional homes to be delivered from 2026-2041 is fully justified and consistent with national policy
- 3. Having regard to the London Plan 2021 requirement for net housing completions of 10,380 homes for the 10 year period 2019/20 to 2028/29:**
- i) What is the basis for the Plan identifying a housing requirement for the remaining years to the end of the Plan period?**
- ii) What is the justification for departing from the London Plan 2021 housing requirements, how is it supported by evidence, and does it raise any questions about whether the Plan is in general conformity with the London Plan?**
- 3.1 Paragraphs 1.7 to 1.9 of the response to questions 1 and 2 above set out how a housing requirement has been identified for the years from 2028/29 to the end of the plan period as described in the Housing Topic Paper (TP10), the Site Selection and Allocation Topic Paper (TP03) and the Housing Trajectory and 5 Year Housing Land Supply Note (SD14).
- 3.2 The Council considers that the Local Plan housing requirement is consistent with the London Plan 2021 (RD01) and does not involve any departure from it:
- the Local Plan requirement is consistent with London Plan Table 4.1 for 2026/27 to 2028/29; and
  - the Local Plan requirement for 2029-2041 has been generated in accordance with the guidance in London Plan paragraph 4.1.11.
- 3.4 The annual figure of 1,038 additional homes given for Camden in Table 4.1 of the London Plan has not been extended beyond 2029 because the Council's

assessment of the sites shows that there is no prospect of housing land becoming available to meet it. Paragraph 16 of the NPPF indicates that plans should "be prepared positively, in a way that is aspirational but **deliverable**" (emphasis added).

- 3.5 The Council's Statement of Common Ground with the Mayor of London (SD19) confirms at paragraph 4.1 that agreement has been reached in relation to strategic matters that were raised in the Mayor's Regulation 19 consultation response. Paragraph 4.2 confirms that the proposed housing targets over the Plan period are in general conformity with the London Plan, subject to two modifications:
- a main modification to Policy H1 Part A to indicate that the target of 11,550 additional homes includes the London Plan annual target of 1,038 homes per year for each of the years 2026/27, 2027/28 and 2028/29; and
  - a minor modification to the paragraph 7.7 supporting Policy H1 to remove the reference to an annualised target of 770 homes per year, which would otherwise be inconsistent with the main modification explained above.
- 3.6 As indicated in paragraph 5.5 of SD14, 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 (following examination in public), consequently the housing target included in the new Camden Local Plan may only apply for a short period of time. However, the Council does not currently anticipate that the GLA will be able to identify any significant sources of additional housing supply in the London Borough of Camden that have not already been considered as part of the work carried out to identify sites for the Local Plan.
- 4. Amongst other things, Policy H2 of the London Plan 2021 requires boroughs to identify and allocate suitable small sites (under 0.25 hectares) for housing. How does the expected proportion of homes to come forward on small sites in the Borough reflect a genuinely plan-led approach to meeting this requirement?**
- 4.1 London Plan Policy H2 expects local planning authorities to achieve the minimum target for small sites set out in Table 4.2 of the London Plan (RD01) as a component of the overall housing target. Table 4.2 identifies a small sites target for Camden of 3,280 additional homes from 2019/20 to 2028/29 (328 per year), as a component of the overall target of 10,380 over the same period (1,038 per year).
- 4.2 The targets in Table 4.2 are informed by the London SHLAA 2017 (RD16) and based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply from intensification in existing residential areas, taking into account PTAL, proximity to stations and town centres, and heritage constraints, rather than an assessment of the potential for individual identified sites under 0.25 ha to contribute to housing supply.

- 4.3 Here it should be noted that London Plan Policy H2 represented an opportunity to identify an additional source of supply to bridge the gap between supply from identified sites and the objectively identified need for housing calculated by the London Strategic Housing Market Assessment 2017, as well as a mechanism to promote a greater diversity of supply and more development by 'SME' housebuilders (small and medium enterprises).
- 4.4 The character of Camden and the sites that become available means that small sites are inevitably a significant source of housing supply. As indicated in the response to question 4 under Matter 4, land that becomes available in Camden is invariably brownfield land, and in most cases, there is existing development on the site. Consequently, many developments involve redevelopment or conversion of existing buildings separately from their neighbours, or infilling parcels of land between buildings, such as car parks or service yards.
- 4.5 With this in mind, the Council has taken a broader approach than the London SHLAA 2017 in identifying sites. The Site Allocations Local Development Document 2013 (LD02) used a lower limit of 0.1 ha for identifying potential allocations (Criteria for Site Selection, page 14 of the file). The Local Plan goes further and considers any site with potential for 10 or more additional homes or 1,000 sqm or more additional floor area (TP3, paragraph 3.3). Here, where sites under 0.25ha were considered to have the potential to deliver 10 or more additional homes or 1,000 sqm or more additional floor area and were assessed as being suitable and deliverable then these were allocated in the Plan (see TP3).
- 4.6 The size distribution of sites allocated in the Local Plan is addressed in the response to question 10 under Matter 4. This indicates that the Local Plan allocates 62 sites for on-site housing, including 20 sites with areas of 0.25 ha or less. Those 20 sites have a total indicative capacity equivalent to 527.4 homes, which represents 5.7% of the indicative capacity of all housing allocations, and 4.6% of the overall housing target. The Council considers that the allocation of these 20 sites represents a planned approach to meeting the requirements of Policy H2 of the London Plan 2021. It should also be noted that, as the Plan doesn't allocate sites with a capacity of less than 10 homes, other provision on small sites is accounted for in the windfall element of the Plan's housing supply, as detailed below.
- 4.7 Given the nature of small sites, which are less likely to be under the control of institutional investors compared to larger sites and less likely to emerge in advance through the Local Plan process, it is inevitable that many of the small sites that come forward for housing during the 15-year Plan period will be unallocated sites. Consequently, there are two other sources of small sites with potential to deliver housing between 2026 and 2041:
- existing permissions and "windfall" sites for non-major developments each involving fewer than 10 additional homes – as set out in the response to question 11 under Matter 4, these sources are expected collectively to deliver 2,100 additional homes over the Plan period (215 from permissions and 1,885 from "windfall" sites); and

- "windfall" sites involving 10 or more additional homes, but each having an area of no more than 0.25 ha – based on the 20 small housing sites allocated in the Local Plan, these are likely to be sites that each have capacity for 26 or fewer additional homes. (The average indicative capacity of the 20 small housing sites (no more than 0.25 ha) allocated in the Local Plan is 26.37 additional homes, that is, 527.4 divided by 20).

4.8 The supply from allocated sites (527.4 homes over 15 years) and from non-major "windfall" sites (2,100 homes over 15 years) amounts to a total of 2,627.4 homes over 15 years (175.16 per year). The Council anticipates that this supply will be supplemented by "windfall sites" providing 10-26 additional homes.

4.9 The Council does have a breakdown by size (number of homes) of all schemes completed between April 2005 and March 2015 (drawn from the London Development Database, which is the former record of planning applications, starts and completions managed by the GLA for the whole of London). Over that period, a total of 3,337 homes were completed from schemes which each involved fewer than 27 homes. The Council notes that the Camden small sites target in London Plan Table 4.2 only applies until 2028/29, but the data for 2005-15 suggests that there is a reasonable prospect of delivering 328 additional homes per year from small sites over the whole Plan period.

4.10 There are several provisions within the Local Plan that should assist the delivery of housing from small sites. These include the following measures:

- Policy H1 Part B.1 regards permanent self-contained housing as the priority land-use of the Local Plan;
- Policy H1 Part B.6 expects the optimum provision of permanent housing on sites which are underused or vacant;
- Policy H4 Part B specifies that a contribution to affordable housing will only be sought from developments that provide one or more additional homes *and* a total addition to housing floorspace of 100 sqm GIA or more, thus excluding subdivision of existing homes and extensions to existing buildings that deliver one or more homes involving a total of under 100 sqm GIA of additional housing;
- Policy H4 Part B.4 sets a sliding scale affordable housing target from 2% to 30% for developments with capacity for 15 or fewer additional homes, so that the full London Plan viability thresholds (currently either 35% or 50%) do not apply;
- Policy H4 Part E.1 and supporting paragraph 7.117 indicate that we will take any existing housing on the site into account, and that affordable housing targets on the sliding scale will be applied to additional residential floorspace only, excluding retention or replacement of existing residential floorspace; and
- paragraph 7.110 supporting Policy H4 confirms that the Council will continue to provide flexibility for payments-in-lieu of affordable housing from developments involving with capacity for fewer than 10 additional homes.

4.11 The Council has also been pro-active in bringing forward small housing developments on its own land. As part of the Council's Community Investment

Programme, it has established a New Homes for Small Sites Programme. This commenced with a call for ideas in Autumn 2022, and proceeded by inviting suggestions about potential sites through a web portal, and undertaking detailed engagement across ten estates. The Council's Cabinet approved initial proposals for phase 1 in February 2023, involving five sites to be developed by Camden and thirteen to be sold to provide development opportunities for others. Three of the Camden sites are sufficiently advanced to appear in the Local Plan housing trajectory, two as submitted applications, and one as a site allocation (C22 Heybridge Garages, Hadley Street). The intention is to seek bids from small and medium builders to construct these homes on behalf of the Council.

4.12 The Council has also invited prospective self-build and custom housebuilders (those on the register and others who have expressed an interest in the register) to bid for a number of small Council sites being sold by auction. We have provided details of five sites to prospective self-builders from 2023 to 2026, four of which had areas under 100 sqm. One of the earliest was subsequently granted planning permission for a self-build home and has now been built out.

**5. How clearly does the Plan explain the amount of housing expected to come forward on small and medium sized sites (up to one hectare) in line with the NPPF?**

5.1 Paragraph 73 of the NPPF (ND01) expects local planning authorities to identify land to accommodate at least 10% of their housing requirements on small and medium sized sites no larger than one hectare. As indicated in paragraph 6.6 of the Housing Topic Paper (TP10), around 18% of the total housing delivery anticipated by the Local Plan will come forward on sites of 1 ha or less.

5.2 Further detail is provided in response to question 10 under Matter 4. Of the 62 sites allocated in the Local Plan for development involving on-site housing, 45 are sites with areas of no more than 1 ha. These 45 sites have a collective indicative capacity equivalent to 2,104 homes.

5.3 The area of each allocated site is given in the Local Plan, unless it is a further site allocation included set out in Tables 3, 5 or 7, which essentially indicates that it is already subject to planning permission or a resolution to grant subject to completion of a S106 legal agreement. An indicative capacity is also provided for each allocated site involving on-site housing.

5.4 The Council considers that sufficient information is provided to demonstrate that 10% of the Local Plan housing requirement will be provided by small and medium sites in line with the NPPF.

**6. Are any modifications required for soundness?**

- 6.1 The Council has proposed a schedule of main modifications (SD51) and a schedule of minor modifications (SD50) to the Camden Local Plan Proposed Submission Draft.
- 6.2 The Council has proposed modifications to Policy H1 Maximising Housing Supply. These are set out in SD51 Schedule of main modifications reference MM48 and MM78.
- 6.3 Minor modifications (not relating to soundness) are also required to Policy H1 Maximising Housing Supply and these are set out in SD50 Schedule of minor modifications reference NMM02.

**7. What factors and evidence underpin the Council's approach to meeting objectively assessed needs for affordable housing?**

**8. Are the affordable housing needs in Camden clearly identified?**

- 7.1 This response addresses questions 7 and 8 together.
- 7.2 The primary factors underpinning the Council's approach to meeting affordable housing needs are the policies of the London Plan 2021 (with which the Local Plan must be in general conformity), and evidence of London-wide and Camden-wide needs and past Camden delivery. It should also be noted that many elements of the approach set out in Local Plan Policy H4 are essentially the same as those found sound during the public examination of the Camden Local Plan 2017 (LD01), although some details have been amended to secure agreement from the GLA that Local Plan Policy H4 is in general conformity with the London Plan (RD01) (see SD19 paragraph 4.3 and the *Table of GLA representations and LB Camden response* for confirmation that the Mayor of London considers that the Local Plan reflects the approach of the London Plan).
- 7.3 The strategic target of 50% referred to in Local Plan Policy H4 part A and part B.5 arises from London Plan Policy H4 part A. The viability thresholds referred to in Local Plan Policy H4 part B.5 and supporting paragraphs 7.118 – 7.120 arise from London Plan Policy H5. As indicated by Local Plan paragraph 7.118, the viability threshold approach will be taken to developments with capacity for 16 additional homes or more.
- 7.4 Local Plan Policy H4 part B.6 sets out a guideline mix of affordable housing types, being 60% low-cost rented housing and 40% intermediate housing. This is consistent with the framework set by London Plan Policy H6 part A, which stipulates a minimum of 30% low-cost rented homes and a minimum of 30% intermediate products, with the remaining 40 per cent to be directed to either of these two types by the borough on the basis of identified need. Camden Council has split this 40% by adding 30% to low cost rent and 10% to intermediate housing, to reflect the assessed need. The 60%-40% split between affordable housing types was also included in the Camden Local Plan 2017, and found to be sound at public examination.

7.5 The Local Plan outlines the evidence supporting the 50% strategic target in paragraph 7.105, which states:

"The London Plan 2021 sets a strategic target for 50% of all homes across London to be genuinely affordable, based on the findings of the 2017 London Strategic Housing Market Assessment that 47% of the housing need in London would be for low-cost rented housing and a further 18% would be for intermediate housing. Camden's Local Housing Needs Assessment found a broadly similar range of affordable housing needs, but with as much as 60% of anticipated housing supply being required to meet the need for low-cost rented housing."

7.6 The Local Plan sets out the basis for the 60%-40% split between affordable housing types in paragraph 7.122, which states:

"As indicated in paragraph 7.105 earlier, Camden's Local Housing Needs Assessment suggests that as much as 60% of our anticipated housing supply would be required to meet the need for low-cost rented housing. There is also a need for intermediate housing (between the cost of social rented housing and market housing), which has some potential to retain middle income households in Camden and lessen social polarisation. However, high values in many parts of the borough mean that the intermediate housing can be more expensive than the cheaper market housing available elsewhere. To balance these considerations and take account of the relative needs found by Camden's Local Housing Needs Assessment, the Council has set guideline percentages for the split of affordable housing types at 60% low-cost rented housing (homes for Social Rent or London Affordable Rent) and 40% intermediate housing."

7.7 The breakdown of the borough's housing need is provided in Figure 40 of the Camden Local Housing Needs Assessment 2025 (EB10). Figure 40 is constrained to the anticipated housing supply over the Plan period (11,550 additional homes), from which the anticipated supply of student housing has been subtracted (3,000 beds, equivalent to 1,200 homes on the basis of London Plan paragraph 4.1.9). Figure 40 also includes 169 additional care home places, based on the assumption that the proportion of older people requiring this form of accommodation remains constant. This leaves a supply of 10,181 self-contained dwellings, of which 6,286 (61.7%) would be needed for low-cost rent, 2,003 (19.7%) would be needed by others unable to afford market housing (potentially intermediate products), and 1,891 (18.6%) would be market housing. Planning practice guidance (ID: 67-001-20190722) recognises that the needs of particular groups may exceed or be proportionally higher in relation to overall need, and indicates that this occurs because the needs of particular groups are considered in relation to the whole population, whereas overall needs are considered in relation to anticipated growth in the number of households.

- 7.8 The Local Plan Policy H4 guideline that 40% of affordable homes should be provided as intermediate housing is a little higher than the Local Housing Needs Assessment would suggest, but is also informed by London Plan Policy H6 part A, and the greater viability of some intermediate products relative to low-cost rented homes.
- 7.9 Local Plan Policy H4 part A also sets a borough-wide delivery target for 3,000 additional affordable homes across the Plan period, equivalent to 200 per year. This reflects the NPPF guidance in paragraph 16 that plans should be aspirational but deliverable. As indicated in paragraph 7.7 above, the Local Housing Needs Assessment suggests that the need for low-cost rent alone over the period will be for 6,286 homes (419 per year), but paragraph 7.111 of the Local Plan notes that over the first five years of Camden Local Plan 2017 period (2016-2021) only 923 additional affordable homes were delivered (184.6 per year). In that context, the Council considers that a target of 3,000 affordable homes is ambitious but achievable.

**9. How does Local Plan policy support the delivery of the strategic target and approaches to the delivery of affordable housing set out in Policies H4 and H5 of the London Plan?**

9.1 Local Plan Policy H4 is in general conformity with Policies H4 and H5 of the London Plan, as confirmed by the Statement of Common Ground between the Council and the GLA (SD19 – see paragraph 4.3 and the Table of GLA representations and LB Camden response).

9.2 The strategic target of 50% and the viability threshold approach arising from London Plan Policies H4 and H5 are supported by the Local Plan as follows:

- the strategic target is confirmed by Local Plan Policy H4 part A and part B.5;
- the viability thresholds are reflected in Local Plan Policy H4 part B.5 and supporting paragraphs 7.118 – 7.120;
- Local Plan paragraph 7.120 confirms that the Council will apply the latest London Plan viability thresholds to larger developments with capacity for 16 or more additional homes (reflecting London Plan Policy H4 part A.1);
- Local Plan paragraph 7.120 also indicates that a viability threshold of 50% applies to industrial land and public sector land (reflecting London Plan Policy H4 parts A.4 and A.5);
- Local Plan Policy H4 part B.9 confirms that affordable housing should be provided on site wherever practical (reflecting London Plan Policy H4 part B); and
- Local Plan Policy H4 part F and paragraphs 7.119, 7.155 and 7.156 confirm that early stage, late stage and mid-term viability reviews will be sought (reflecting London Plan Policy H5 parts E and F).

9.3 The Local Plan proposes some measures to support delivery of additional affordable housing that are distinct from the London Plan approach. These have been adjusted

from the Camden Local Plan 2017 and its predecessors through negotiation with the GLA to achieve general conformity with the London Plan. The distinctive measures are:

- use of affordable housing targets on a sliding scale for smaller developments which have capacity for 15 or fewer additional homes, as set out in Local Plan Policy H4 part B.4 and paragraphs 7.114 to 7.117 – the sliding scale progresses from 2% to 30%, and has been designed to achieve the maximum reasonable contribution overall without deterring development or suppressing scheme size through a high starting target;
- seeking affordable housing contributions on the sliding scale from non-major developments as a departure from the NPPF (as explained in Local Plan paragraphs 7.108 – 7.109 and previously found to be sound in through public examination of the Camden Local Plan 2017); and
- providing flexibility for affordable housing contributions in the form of payments-in-lieu from non-major development (as explained in Local Plan paragraph 7.110).

9.4 In drafting Local Plan Policy H4, the Council have sought to ensure that the policy can be understood in its own right (without constant reference to the London Plan). The drafting has also taken place in the context of the early stages of a review of the London Plan, which might choose to amend the current viability thresholds of 35% and 50%, so the Council has sought to avoid entrenching those in the wording of Local Plan policy.

9.5 The Council has proposed two minor modifications to clarify the relationship between the Local Plan and London Plan Policies H5 and H6 (SD50 reference NMM03 and NMM04). Modifications to paragraph 7.124 confirm that the Council intends to adhere to the guideline mix of affordable housing types set out in Local Plan Policy H4 part B.6. Modifications to paragraph 7.154 confirm that the consideration of financial viability is only expected at the application stage where proposals do not reach the relevant London Plan viability thresholds, or where smaller developments do not meet the sliding scale target set out in Local Plan Policy H4 part B.4. Paragraph 4.3 of the Statement of Common Ground with the GLA (SD19) makes reference to these modifications, and the GLA have confirmed that the Local Plan reflects the approach of the London Plan in respect of the affordable housing thresholds.

**10. How well is the approach to affordable housing supported by robust evidence of financial viability, having regard to other requirements of the Plan and how clearly does it set out the decision making process for viability?**

10.1 The Local Plan's approach to affordable housing is supported by the robust evidence of the Camden Local Plan Viability Study 2025 (EB01). The conclusions of the Viability Study summarise elements of the study that support the Local Plan approach as follows.

- Paragraph 7.2 states: "This report and its supporting appendices test the ability of development typologies in Camden to support the proposed policies of the draft NCLP [new Camden Local Plan] alongside other plan policies while making contributions to infrastructure that will support growth through the adopted CIL."
- Paragraph 7.3 states: "Although the NPPF sets an ambition for plan policies to be set in the plan with little use of viability assessments when planning applications are brought forward, this is only a realistic expectation in rural district authorities with homogenous greenfield development. In common with other London boroughs, Camden has a complex range of development scenarios, with development sites that are in various existing uses; significant variation in the types of developments that come forward; and a high degree of variability in residential sales values. In such circumstances, setting a policy that all schemes can viably deliver would require the level of affordable housing to be set at such a low level, it would be relatively meaningless in terms of meeting affordable housing need. It would be a policy that is determined by the lowest common denominator and schemes that could have viably delivered a higher percentage would no longer be required to do so."
- Paragraph 7.4 states: " We therefore support the Council's proposed approach, which maintains its ambitious target for affordable housing, which some schemes can meet over the plan period, but recognises that this will not always be achieved due to site-specific viability issues. This approach is essentially consistent with the existing policy approach both in the adopted Camden Local Plan 2017, and also in the London Plan, which adopts a threshold approach to affordable housing, and has an explicit route for schemes that cannot provide the threshold level of affordable housing. The threshold percentage itself is set at a lower level for most development (35%) than the London Plan's strategic target of 50%"
- Paragraph 7.5 states: "In considering the outputs of the appraisals, it is important to recognise that some developments will be unviable regardless of the Council's requirements. In these cases, the value of the existing building or the base costs (excluding policy requirements) will be higher than a redevelopment opportunity over the medium term. However, this situation should not be taken as an indication of the viability (or otherwise) of the Council's policies and requirements. In these situations, there will be little pressure from owners to redevelop for residential use and they might re-consider the situation when values change over time."
- Paragraph 7.6 states (in part): "We have appraised residential schemes with a range of affordable housing from 0% to 50% to test the ability of development typologies to meet the requirements of draft Policy H4... our appraisals indicate that there are significant variations in the percentages of affordable housing that can be provided depending on private sales values, scheme composition and benchmark land value. The results therefore do not point to any particular level of affordable housing that most schemes can viably deliver. The Council's draft Policy H4 maintains the currently adopted strategic target of 50% (applied on a sliding scale) and takes into consideration the economics and financial viability of site-specific circumstances. Given that this effectively reflects the Council's current practice (albeit with a shortened sliding scale) and also the approach in

the 2021 London Plan, we consider the draft Policy to be reasonable. It allows for sufficient flexibility, both in terms of tenure mix and overall quantum, to enable schemes to come forward with the maximum viable package of affordable housing. Setting a lower proportion of affordable housing would likely result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so."

- In relation to seeking affordable housing contributions from non-major development, paragraph 7.6 further states: "our appraisals indicate that there is no significant difference in the viability of schemes providing 9 or fewer units than those of 10 units or more. We consider the Council's Policy approach of seeking affordable housing on a sliding scale, applied subject to viability, to be reasonable. As providing affordable housing on small sites gives rise to practical difficulties, the Council's flexibility in seeking PIL of onsite affordable housing for such schemes is a pragmatic approach."

10.4 As set out in response to question 9 above, the decision-making process for viability is consistent with London Plan Policy H5. Specifically:

- the viability thresholds are reflected in Local Plan Policy H4 part B.5 and supporting paragraphs 7.118 – 7.120;
- Local Plan paragraph 7.120 confirms that the Council will apply the latest London Plan viability thresholds to larger developments with capacity for 16 or more additional homes (reflecting London Plan Policy H4 part A.1);
- Local Plan Policy H4 part F and paragraphs 7.119, 7.155 and 7.156 confirm that early stage, late stage and mid-term viability reviews will be sought (reflecting London Plan Policy H5 parts E and F); and
- minor modifications are proposed in SD50 to Local Plan paragraph 7.154 to confirm that the consideration of financial viability is only expected at the application stage where proposals do not reach the relevant London Plan viability threshold, or where smaller developments do not meet the sliding scale target set out in Local Plan Policy H4 part B.4.

10.5 As also set out in response to question 9, in drafting Local Plan Policy H4, the Council have sought to ensure that the policy can be understood in its own right (without constant reference to the London Plan). The drafting has also taken place in the context of the early stages of a review of the London Plan, which might choose to amend the current viability thresholds of 35% and 50%, so the Council sought to avoid entrenching those in the wording of Local Plan policy.

## **11. Is the type and tenure of housing needed for different groups in the community assessed and reflected in the Plan, including the groups of society set out in the NPPF?**

11.1 Paragraph 63 of the NPPF indicates that planning policies should reflect the housing needed by different groups in the community, including a specified range of groups. The Local Plan addresses the housing needs of different groups in some detail, including all those listed in NPPF paragraph 63.

11.2 Paragraphs 7.177 to 7.179 of the Local Plan summarise the Plan's provision for the NPPF groups. The bullet points below list the NPPF paragraph 63 groups in turn, and indicates where they are addressed in the Local Plan:

- those who require affordable housing (including Social Rent) – provision is made by Local Plan Policy H4;
- families with children – provision is made by Local Plan Policy H7;
- looked after children – Local Plan Policy H7 makes provision for those in foster families, provisions for others are made by Local Plan Policy H8 and supporting paragraphs 7.250 – 7.251;
- older people (including those who require retirement housing, housing-with-care and care homes) – provision for those requiring specialised housing is made by Local Plan Policy H8 and supporting paragraphs 7.239 – 7.242, while accessibility measures to assist people with mobility limitations are included in Local Plan Policies D3 and H6 part B.2 and supporting paragraph 7.174. In accordance with Policy H6, criteria have also been included in certain site allocation policies, to support the delivery of housing for older people and other people with care or support requirements;
- students – provision related to accommodation specifically for students is made by Local Plan Policy H9. Where appropriate sites have also been identified in the Plan to support the delivery of student accommodation and this is reflected in relevant site allocation policies;
- people with disabilities - accessibility measures to assist people with mobility limitations are included in Local Plan Policies D3 and H6 part B.2 and supporting paragraph 7.174, provision related to those with learning disabilities and autism are made by Policy H8 and supporting paragraphs 7.426 – 7.429;
- service families – provision is made by Local Plan Policy H6 part B.7 and supporting paragraphs 7.189 – 7.190;
- Travellers – provision is made by Local Plan Policy H11. Two sites have also been allocated in the Plan (S20 and C27) to help meet the accommodation needs of Gypsies and Travellers;
- people who rent their homes – provision for those who rent affordable homes is made by Local Plan Policy H4, provision for those who rent market homes is made by Local Plan Policy H6 part B.6 and supporting paragraphs 7.184 – 7.188; and
- people wishing to commission or build their own homes – provision is made by Local Plan Policy H6 part B.7 and supporting paragraphs 7.191 – 7.195.

11.3 The Local Plan also makes provision for people residing in houseboats moored on inland waterways in Policy H6 part B.8 and supporting paragraphs 7.196 – 7.199.

## **12. Is the interaction with Policies H6 and H10 of the London Plan clear?**

12.1 The Council considers that the interaction between the Local Plan and London Plan Policies H6 Affordable housing tenure and H10 Housing Size Mix is clear.

- 12.2 In relation to affordable housing tenure, the response to questions 7 and 8 above highlights the guideline mix of 60% low-cost rented housing and 40% intermediate housing set out in Local Plan Policy H4 part B.6, and notes that this is consistent with the London Plan stipulation that a minimum of 30% affordable housing should be in each of these two tenures, with the remaining 40% being determined by the borough.
- 12.3 The Council has proposed a minor modification to clarify the relationship between the Local Plan and London Plan Policy H6 by confirming that the Council will adhere to the guideline mix of affordable housing types set out in Local Plan Policy H4 part B.6 (SD50 ref NMM03). The proposed modification relates to paragraph 7.124 and is as follows:  
"We will expect applications to adhere as closely as possible to the guideline mix set out in Policy H4 part B6. However, the guideline mix will be applied flexibly taking into account the need to achieve a rational division of the development in terms of homes of appropriate sizes and tenures, and the criteria in Policy H4, and in certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing."
- 12.4 Local Plan paragraph 7.123 signals that the full range of intermediate products included in the London Plan are unlikely to be appropriate in Camden due to high property values - this relates to low-cost forms of home ownership, notably shared ownership. The Council's position is backed up by the Mayor's Affordable Housing and Viability London Planning Guidance 2017 (RD10), which states that "Generally shared ownership is not appropriate where unrestricted market values of a home exceed £600,000". House Price Index data from the Land Registry at September 2025 indicates that throughout the year 2024/25, average Camden prices across all property types exceeded £800,000, and average Camden prices for flats and maisonettes (the cheapest category) exceeded £670,000.
- 12.5 The Council considers that being more positive about shared ownership within the Local Plan could encourage proposals to include shared ownership where it is at the margins of affordability. This would arise either because a gross household income of £90,000 was only just sufficient to secure a mortgage for the minimum equity share, or the minimum rent payable on the unsold equity (together with mortgage repayments and service charges) was close to the affordability cap of 40% of net household income. In such circumstances, modest increases in market values could mean that the proposed shared ownership homes ceased to be deliverable between the grant of planning permission and completion of the dwellings. This would not be appropriate.
- 12.6 Local Plan paragraph 7.123 does not seek to prohibit shared ownership, rather it strongly encourages the provision of homes for intermediate rent. If the market values for a site are at a level low enough for shared-ownership to be affordable within the London Plan gross annual household income cap of £90,000, the Local Plan would not prevent favourable consideration of shared-ownership, subject to

satisfying the provision in paragraph 4.6.9 of the London Plan 2021 that "Boroughs should seek to ensure that intermediate provision provides for households with a range of incomes below the upper limit". Overall, the Council considers that the Local Plan's position in relation to shared ownership is a minor locally justified variation to the London Plan approach taking into account Camden's specific circumstances. The Statement of Common Ground between the Council and the GLA (SD19) confirms that the GLA agree with the approach taken.

- 12.7 London Plan Policy H10 does not propose any particular mix of dwelling sizes, but defers to decision-makers (part A) and to boroughs (part B), subject to robust evidence of need, and a selection of other criteria.
- 12.8 The Local Plan sets out its policy on dwelling sizes in Policy H7. This is a highly flexible policy; the only element of prescription is to seek the provision of new 3-bedroom homes and resist the loss of existing ones. This is consistent with the findings of the Camden Local Housing Needs Assessment (EB10), which identified 3-bedroom homes as the size needed by the largest number of households, including both those requiring low-cost rented housing and those requiring market housing.
- 12.9 Rather than prescribing the proportion of dwelling sizes required for each tenure of housing, Local Plan Policy H7 expects housing development to contribute to meeting Camden's Dwelling Size Priorities, set out in Local Plan Table 9. For each tenure, each dwelling size is labelled "lower", "medium" or "high". Evidence has been drawn from the Camden Local Housing Needs Assessment and a number of other sources identified in Local Plan paragraph 7.207, all of which are considered to be robust.
- 12.10 London Plan Policy H10 part B indicates that for low-cost rent, boroughs should provide guidance on the size of units required by number of bedrooms. It does not indicate that this is a matter for Local Plans. The Council currently provides detailed information on size requirements for low-cost rented in Camden Planning Guidance: Housing 2021 (LD30) (see Figure 1 on page 25). This is referred to in Local Plan paragraph 7.210, which indicates that the Council expects to retain and aim for at least 50% of low-cost rented dwellings in each scheme to be large homes (3 bedrooms or more). This is consistent with Figure 40 of the Camden Local Housing Needs Assessment, which shows that more than half the need for low-cost rented homes (labelled social rent) will be for homes with 3 bedrooms or more.
- 12.11 Local Plan Policy H7 identifies several factors that may justify departure from the emphasis on 3-bedroom homes and/ or the Table 9 Dwelling Size Priorities. A number of these are comparable with criteria set out in London Plan Policy H10. For example, Policy H7 part A aims for the creation of mixed, inclusive and sustainable communities, while part D provides for consideration of the existing mix of dwelling sizes in the area, the character and size of the development, any evidence of different needs relating to a specific sector such as build to rent and whether

flexibility around the market mix could secure delivery of additional affordable housing.

12.12 Taking all these factors into account the Council considers that Local Plan Policy H7 is wholly consistent with London Plan Policy H10, and offers a robust and effective way of assessing the mix of dwellings included in proposals for housing development in Camden.

**13. Having regard to the requirements of the NPPF, how do policies in the Plan assess and reflect the size, type and tenure of housing needed for different groups in the community and are they in general conformity with the London Plan?**

13.1 The response to questions 7 and 8 above addresses how the Local Plan assesses and reflects the overall need for affordable housing, whilst the Local Plan's approach to the different types of affordable housing required is explained in responses to questions 7, 8 and 12 (paragraphs 12.1 to 12.6). The response to question 11 lists all the groups identified in NPPF paragraph 63 and indicates where they are addressed in the Local Plan, whilst the response to question 12 (paragraphs 12.7 to 12.12) explains the Local Plan's approach to dwelling sizes (number of bedrooms). Taking all these matters into account, the Council considers that the Local Plan fully addresses the requirements of the NPPF in relation to the tenure, type and size of homes needed, and the housing needed for different groups in the community.

13.2 General conformity with the London Plan is addressed in the responses to questions 7 and 8 (combined), 9, 10 and 12 above. The Statement of Common Ground between the Council and the Mayor of London (SD19) confirms in paragraph 4.1 that "agreement has been reached in relation to strategic matters raised within the Mayor's Regulation 19 response. There are no outstanding issues related to these matters at this time." The Statement includes the strategic matters that had been raised in the Table of GLA representations and the LB Camden response, and sets out how they have been resolved.

13.3 Elements of the Local Plan involve minor variations to the London Plan approach (primarily in relation to the needs of different groups), and have been queried in responses to the Regulation 19 consultation on the Local Plan. These are addressed below.

**Build to rent**

13.4 Local Plan Policy H4 Part D indicates that the Council encourages an alternative option to the London Plan approach in relation to affordable accommodation provided in association with build to rent housing, purpose-built student and large-scale purpose-built living. In relation to build to rent housing, the London Plan indicates that affordable housing can take the form of Discount Market Rent housing. As an alternative, the Local Plan provides for affordable housing to be

provided in line with the guideline mix of affordable housing types set out in Policy H4 Part B.6 (60% low-cost rented housing, 40% intermediate housing).

- 13.5 One response proposed that supporting paragraphs should be amended to favour the delivery of Discount Market Rent housing over the Part B.6 alternative. In summary, the Council disagree with the changes proposed, maintaining that:
- the London Plan approach does not seek any low-cost rented homes and provides for 70% of Discount Market Rent homes to cost up to 80% of market rent;
  - this approach would be far less effective in addressing the specific affordable housing need identified by the Camden Local Housing Needs Assessment (EB10) which is set out in Council's alternative of meeting the guideline mix set out in Local Plan Policy H4;
  - nevertheless, Policy H4 Part D, supporting paragraph 7.145, and paragraph 7.187 (supporting Policy H6) are clear that the Council will support proposals that offer affordable housing contributions in accordance with the London Plan provisions.

### **Local Plan Policy H6 and student accommodation**

- 13.6 Local Plan Policy H6 Part B.4 indicates that the Council will seek the provision of the types of housing appropriate to meet the particular needs identified by Policies H8 (Housing for people with care or support requirements), H9 (Purpose-built student accommodation), and H11 (Accommodation for travellers). Policy H6 Part B.6 indicates that the Council supports build to rent developments where this will assist the creation of mixed, inclusive and sustainable communities, subject to compliance with all relevant policies.
- 13.7 At the Regulation 18 stage of Local Plan consultation, purpose-built student accommodation and build to rent developments were both referred to in the same clause of Policy H6 Part B. One response to the Regulation 19 stage consultation requested that student accommodation should be referred to alongside build to rent developments and the creation of mixed, inclusive and sustainable communities, as it was previously. The Local Plan provides detailed guidance on purpose-built student accommodation in Policy H9, including a reference to creating a mixed, inclusive and sustainable community at Part B.8. In contrast, build to rent does not have a dedicated Local Plan policy other than Policy H6. Accordingly, the Council considers that it is appropriate for build to rent development to be separate from student accommodation, and be addressed by the more detailed clause of Policy H6 Part B.6.

### **Local Plan Policy H8 and the needs of older people**

- 13.8 The London Plan sets out annual borough benchmarks for specialist older persons housing in Table 4.3. Associated Policy H13 requires that boroughs take account of these "indicative benchmarks" in identifying suitable sites. The Camden benchmark

of 105 additional homes per year is included in Local Plan paragraph 7.258, supporting Policy H8.

13.9 One response objected that the Local Plan should determine the need for specialist older persons housing, or else more fully take the London Plan benchmark into account. The Council's position has been agreed in the Statement of Common Ground between the Council and the Mayor of London (SD19). In summary, the Council considers that:

- the indicative benchmark is already included in Local Plan paragraph 7.258, and the London Plan does not propose that it should be included in a policy;
- the scale and nature of the need for Council-supported accommodation for older people is set out in Local Plan paragraphs 7.239 to 7.242, and the Council anticipates these will be met through the application of Policy H8 Parts D and F;
- the Council anticipates that the need for market provision will be met through the application of Policy H8 Parts E and F;
- the allocated use of two sites in the Local Plan includes a specialist care home, while ten more sites are identified as having potential to include housing for older people or other people with care or support requirements; and
- a revised London Plan is expected to be finalised in 2027/28, and may potentially include a new benchmark extending beyond 2029.

13.10 A further response expressed concerns about perceived attempts to control the costs that care homes would charge to occupiers, and the absence of any express provision for review of the viability implications of the policy for care home proposals. The Council's explains its approach in Local Plan paragraphs 7.255 to 7.263. Key aspects of the Council's position are:

- the London Plan does not contain a policy that expressly deals with care home accommodation, although it is addressed by London Plan paragraphs and 4.13.4 and 4.13.14;
- neither the London Plan nor the Local Plan seek to apply a conventional requirement for affordable housing to care home accommodation;
- the Council has market-shaping duties under the Care Act 2014, which it operates in conjunction with four other North Central London authorities;
- new facilities which saturate the local market for a particular type of support can lead to increased levels of vacancy and costs across that sector, and may ultimately lead to the failure of some providers and to the disruption of care and support for residents;
- facilities that primarily attract residents who initially fund their own care and support may place severe strain on the Council's budget once their source of funds is exhausted, or if the proposed cap on self-funding is introduced;
- the local market for standard residential care is saturated, and our assessment of existing and emerging needs justify resisting further provision of standard residential care while encouraging the provision of nursing care and specialist care;
- Policy H8 Part F.8 provides for care homes to be provided at costs consistent with the North Central London minimum sustainable bandings, or alternatively

for a proportion of places to be accessible to Council-funded residents at a sustainable cost;

- Policy H8 does not propose a cost ceiling, or set minimum percentage of places for Council-funded residents - rather it seeks to establish that where costs significantly exceed the minimum sustainable bandings, the Council will seek to negotiate a number of places at sustainable costs for Council-funded residents; and
- nothing in Policy H8 would prevent the Council from taking account of financial viability and the impact of Policy H8 Part F.8. when considering proposals for care home accommodation.

13.11 Having reviewed the responses to the Local Plan consultation that related to the housing needs of different groups in the community, the Council is satisfied that Local Plan policies relating to these groups are in general conformity with the London Plan.

## **Policy H1**

### **With reference to Policy H1:**

#### **14. Is support for purpose built student accommodation in Policy H1 justified?**

14.1 The Council considers that support for purpose built student accommodation in Policy H1 Maximising Housing Supply is justified.

14.2 Camden is home to many education institutions of national and international significance, notably 9 publicly funded Universities and the provision of higher education and research significantly contributes to Camden's ambition for its local economy to be strong, sustainable, and inclusive.

14.3 The borough is also home to approximately 25,000 resident full-time students (almost 6% of the London total). There are approximately 13,000 bedspaces available in purpose-built student accommodation in Camden, while the majority of the remaining resident students live in other forms of rented housing.

14.4 Paragraph 63 of the NPPF (ND01) states that "housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include... students...".

14.5 London Plan 2021 (RD01) Policy H15 Purpose Built Student Accommodation states that "Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed". The London Plan indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year. This requirement was established through the work of the Mayor's Academic Forum (see paragraph 4.15.2 of the London Plan and RD51 Student population projections and accommodation need for new London Plan 2017 (amended October 2018)).

- 14.6 Policy H9 Purpose Built Student Accommodation in the Local Plan sets out the Council’s approach to student accommodation and states that “the Council will seek a supply of student housing to meet or exceed Camden’s target of 200 additional places in student housing per year and will support the development of student housing” subject to the provisions set out in the Policy.
- 14.7 Student housing makes a contribution towards meeting the borough’s housing target (with 2.5 student rooms treated as equivalent to one home), it addresses a housing need, and can reduce the pressure for students to share existing large homes.
- 14.8 It is therefore considered that reference to support for purpose built student accommodation in Policy H1 Maximising housing supply is justified and is consistent with national policy and the London Plan.
- 15. Is the definition of “permanent self-contained housing” justified and effective?**
- 15.1 The definition of permanent self-contained housing is considered to be justified and effective. The definition is set out at paragraph 7.10 of the Local Plan. This states that:
- “Self-contained houses and flats are defined as homes where all the rooms, including the kitchen, bathroom and toilet, are behind a door that only one household can use (2021 Census Glossary of Terms). The term “permanent” is used to refer to housing where people live long-term (i.e. for periods of not less than 90-days) and is used to distinguish such housing from short-term lets or visitor accommodation.”
- 15.2 The definition of self-contained housing used in the submitted Plan is consistent with the definition used in the adopted Local Plan 2017 (LD01), which was found sound at examination. Self-contained housing has been the priority land use in Camden for many years to reflect the scale of housing need in the borough and the challenges in delivery (see paragraphs 7.12 – 7.14 of the Plan for further explanation).
- 15.3 Whilst the meaning of ‘self-contained housing’ is not set out in legislation, the meaning of a “house in multiple occupation” is defined in Section 254 of the Housing Act 2004. Taking this into account, and given that a house in multiple occupation is essentially the opposite of what is described above, the definition of self-contained housing included in the Plan is considered justified.
- 15.3 The term ‘permanent’ has been incorporated into Policy H1 in response to the fact that the Council has recently received a number of applications specifically for short-term visitor accommodation in the form of self-contained flats that might otherwise be used as permanent homes.
- 15.4 The use of the term ‘permanent’ is consistent with the Council’s existing policy approach set out in Policy H3 Protecting existing homes of the adopted Local Plan

2017 (LD01) which has been operating effectively and states that “The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by... (b) protecting housing from permanent conversion to short-stay accommodation intended for occupation for periods of less than 90 days”. Paragraph 4.70 of the adopted Plan states that “Proposals we will resist include:... proposals that would involve a permanent change of residential floorspace from long-term accommodation to short-term visitor accommodation let for periods of less than 90 days.”

- 15.5 Paragraph 7.81 of the submitted Plan states that “Short-term lets are lets for any period of less than 90-days, and frequently involve periods of a few days or weeks.... In London, the Greater London Council (General Powers) Act 1973 (as amended by the Deregulation Act 2015) provides for Council Tax payers to let their property as visitor accommodation for short periods not exceeding a total of 90 days in any one calendar year.” Given this, it is considered that the definition of ‘permanent’ is justified.
- 15.6 Data commissioned for Central London Forward (RD52) indicates that in Camden, there are over 4,000 short-term lets being offered for aggregate periods exceeding the 90 day restriction, and over 5,000 entire homes being marketed for short-term lets. In addition, data compiled by the Council indicates that equivalent weekly rental for short-term let in Camden is over twice the average rent available in the wider market, and over three times for 1 bedroom and 2 bedroom homes. Given the threat that the growth of this use poses to the rental housing market and the delivery of new permanent homes, the Council considers it justified to resist the development of housing for use as short-term lets, unless the site is shown to be unsuitable for the provision of any form of permanent housing.

**16. When considering optimising sites to deliver housing should paragraph 7.31 of the Plan refer to the Sustainable Residential Quality density matrix?**

- 16.1 Part B. 7 of Policy H1 Maximising housing supply states that:

“the Council will seek to secure a sufficient supply of homes to meet the needs of existing and future households in Camden to meet or exceed the above housing target by... optimising the homes delivered on each site by using a design-led approach, in accordance with policies for design and heritage in the London Plan and the Local Plan, including any relevant space standards, to achieve the maximum reasonable provision of housing that is compatible with any other uses needed on the site.”

- 16.2 Paragraphs 7.28 – 7.32 of the supporting text to Policy H1 then provide further details of how the Council expects this to be achieved. Paragraph 7.31 states that:

“When considering the optimum number of homes, the Council will have regard to all relevant policies and guidance, particularly those related to design and heritage, such as policies addressing conservation areas, the appropriateness of

tall buildings, mobility difficulties and accessibility, and applicable space standards. We will also consider the accessibility of the site by public transport and the density of housing in the immediate context. Taking account of the Sustainable Residential Quality density matrix in the London Plan 2016, the Camden Local Plan 2017 indicated that densities of new self-contained homes should generally be between 45 dwellings per hectare (in areas of existing low density or lower public transport accessibility) and 405 dwellings per hectare (in areas of existing high density or higher public transport accessibility). This range continues to be appropriate as a broad guideline, but the Council recognises that lower or higher densities may be justified in some contexts.”

- 16.3 Policy H1 is clear that the Council seeks to optimise the homes delivered on each site by using a design-led approach, in accordance with the London Plan 2021 (RD01). Paragraph 7.31 provides supporting text which explains that the densities from the Sustainable Residential Quality density matrix provide a broad guideline and that lower or higher densities may be appropriate taking into account site context.
- 16.4 Although the Sustainable Residential Quality density matrix does not appear in the current London Plan, the densities from it that are referred to in the current Local Plan 2017 remain appropriate to provide a broad guideline for development in the borough. The reference in the submitted Plan is therefore considered to be reasonable.

## **Policy H2**

### **17. Is the policy requirement to provide a mix of uses on all qualifying sites justified and effective?**

- 17.1 The Council's mixed-use policy was first introduced in 2004, and has been in place in broadly the same form for twenty years (since adoption of the Camden Replacement UDP in June 2006), although the draft Local Plan seeks to adjust and extend the area of application of the detailed requirements of proposed Policy H2 part B. The existing policy was found to be sound during Public Examination of the Camden Local Plan 2017.
- 17.2 In general terms, justifications for the proposed Policy H2 are set out in its supporting text. In summary, Policy H2 is justified by:
- the housing requirements identified by Policy H1;
  - the need to provide housing as part of mixed-use schemes in order to address Camden's housing needs whilst also meeting the areas other needs, such as provision of jobs, services and facilities;
  - providing a range of activities that attract people at different times of the day and evening to increase community safety and security;
  - creation of areas that are diverse, distinctive and attractive;
  - reducing the need to travel between homes, jobs and services

- overcoming the loss of custom for shops and services arising from increased home-working and less consistent occupation of workplaces;
- providing efficient use of land, with housing developed above or behind those uses which benefit from direct ground floor access or a main road frontage, such as shops; and
- maintaining the well-established mixed-use character found in large areas of the borough, particularly the south sub-area.

- 17.3 Population statistics are helpful in justifying the policy by illustrating the importance of the borough's part of the CAZ as a residential location. Outputs from the 2021 Census relate to the population defined as 'usually resident' on census day (21 March 2021). Unfortunately, that date was during a period of COVID-19 restrictions which affected the number of people living in Camden. Many people were absent who would normally be present, particularly in the south of the borough – including many students, younger workers, EU nationals and people with access to alternative or second addresses. Consequently, the 2011 Census is considered to provide a more reliable indication of the residential significance of the CAZ.
- 17.4 In 2011, three Camden wards were located wholly within the CAZ: Bloomsbury, Holborn and Covent Garden, and King's Cross. The population densities in these wards were 107 persons per hectare, 108 persons per hectare and 194 persons per hectare respectively, compared with the borough's overall population density of 101 persons per hectare. Collectively, these wards were home to 35,758 usual residents (16% of the borough total population of 220,338) over a total area of 283 hectares (13% of the borough total area of 2,180 hectares). Considering the area and population density of the three CAZ wards, it is evident that the CAZ is home to a relatively high proportion of the borough's residents compared with outer areas of the borough. Whilst such data is not so readily available for the remainder of the defined areas of high public transport accessibility, the Council considers that high population densities are also characteristic of many of the other parts of the borough, such as the town centres of Camden Town and Finchley Road/ Swiss Cottage.
- 17.5 A further compelling justification for Policy H2 is the number of homes it contributes to the borough's housing supply. The Local Plan allocates 28 sites in the south sub-area of the borough alone (there are also several allocations in the town centres of Camden Town and Finchley Road/ Swiss Cottage). Twenty-one of the sites in the south sub-area are allocated for a mix of uses, three are in the Bloomsbury Campus Area and allocated for higher education uses, and four are sites associated with estate regeneration under the Council's Community Investment Programme and allocated for housing. Of the 21 sites allocated for a mix of uses, 18 are allocated for delivery of on-site housing, and an additional site is close to delivering housing on a nearby site (permissions for the non-residential development and the off-site housing were granted in tandem and the relationship secured through S106 legal agreements).

- 17.6 These mixed-use allocations in the south sub-area have indicative site capacities totalling 2,119 additional homes. These sites have previous non-residential uses and are in areas where the existing mix of uses includes many commercial activities. The established provisions of Policy H2 provide the basis for including housing within the allocated mix of uses. Consequently, the Council considers that without Policy H2, the borough's housing supply over the Plan period could diminish by over 2,000 homes in the south-sub area alone. An additional but smaller number of homes would also be lost from Camden Town and Finchley Road/ Swiss Cottage. Without Policy H2, further homes are likely to be lost from non-residential developments arising on sites that have not yet been identified within the defined areas of high public transport accessibility, although the loss cannot be quantified.
- 17.7 Successful mixed-use schemes that have already been delivered provide further justification of the importance of proposed Policy H2 in securing housing supply, and evidence of the effectiveness of Policy H2 as currently set out in the Camden Local Plan 2017. Here, the following schemes illustrate the effectiveness of the policy and the variety of ways in which it has been satisfied (further information on this could be provided if the Inspector considers it to be helpful):
- Stephenson House, 75 Hampstead Road, completed 2024 (2017/3518/P, CAZ, 17 additional homes including 6 affordable homes, 2,624 sqm additional non-residential floorspace, primarily offices);
  - 150 Holborn, completed 2022 (2016/5202/P, CAZ, 13 additional market homes, 3,916 sqm additional non-residential floorspace, primarily offices);
  - Castlewood House and Medius House, New Oxford Street, completed 2024 (2017/0618/P, CAZ, 18 additional affordable homes, 6,273 sqm additional non-residential floorspace, primarily offices); and
  - 115-119 Camden High Street, completed 2023 (2019/3138/P, Camden Town, 3 additional affordable homes, 1,233 sqm additional non-residential floorspace, primarily hotel rooms).
- 17.8 Further small schemes are also identified in the response to question 19 below.
- 17.9 The Statement of Common Ground between the Council and the Mayor of London (SD19) does not identify office development, strategic functions of the CAZ or the Local Plan's mixed-use policy as key strategic matters. However, the table of GLA representations and LB Camden responses included in SD19 addresses both office development and the Central Activities Zone in the rows on pages 24-26, and confirms that the Mayor of London accepts the Council's position.
- 17.10 Taking all these factors into account, the Council considers that the requirements in Policy H2 for a mix of uses including housing is justified and effective.

**18. Is the area where a contribution to permanent self contained housing is required justified?**

- 18.1 The Council's mixed-use policy was first introduced in 2004, and has been in place in broadly the same form for twenty years (since adoption of the Camden Replacement UDP in June 2006). The area to which the requirement for 50% housing applied remained the same in the Camden Local Plan 2017 as it had been since 2004, namely the CAZ (previously designated in Camden as the Central London Area) and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road. Existing Policy H2 and the extent of its application was found to be sound during Public Examination of the Camden Local Plan 2017.
- 18.2 The draft Local Plan seeks to adjust and extend the area of application of the detailed mixed-use requirements of proposed Policy H2 Part B. The changes proposed are as follows:
- the requirements would cease to apply to the town centre of Kilburn High Road, since there is no recent history of development of additional non-residential floorspace in this area;
  - the requirements would be extended from the CAZ to the entire south sub-area of the borough – this extension would add an area between Regent's Park and Camden Town/ Hampstead Road (including the Regent's Park Barracks and parts of the area covered by the Euston Area Plan), and an area between Camden Town/ Eversholt Street and the King's Cross Opportunity Area identified in the London Plan (including several allocated sites in the vicinity of Royal College Street, St Pancras Way and Camley Street); and
  - the requirements would also be extended to the edge-of-centre area around the south of the town centre at Camden Town, which would otherwise represent a gap between the boundary of the south sub-area and the town centre boundary, and which might otherwise provide for entirely non-residential developments in the vicinity of Arlington Road and Bayham Street.
- 18.3 Extension of the scope of Policy H2 Part B to the edge-of-centre area around the south of Camden (an extension of approximately 23 ha) arises primarily from the proposed extension to cover the entire south sub-area of the borough. If Policy H2 part B applied across the entire south sub-area and in the town centre of Camden Town but not in this edge-of-centre area, it would provide an incentive for non-residential development to take place at the edge-of-centre rather than in the CAZ or the town centre itself. This could have the unintended consequence of attracting commercial uses away from the town centre and into areas which are more residential in character and better suited to housing.
- 18.4 Extension of the scope of Policy H2 Part B from the CAZ to the entire south sub-area (an extension of approximately 130 ha) is the most significant change proposed.
- The western element of the extension (between Regent's Park and Camden Town/ Hampstead Road) is largely within the area covered by the Euston Area Plan (EAP). The Council notes that the Euston Area Plan (EAP) has been

prepared on the basis that the provisions of the Local Plan will apply in the Euston Area, save where expressly excepted, so its policies relate to the particular circumstances of Euston rather than duplicating Local Plan provisions. The Council anticipates that Policy H2 will have a significant role in ensuring the development associated with the construction of new rail infrastructure around Euston takes full advantage of opportunities to create additional housing. In addition, the western element of the extension includes Regent's Park Barracks, on a site of approximately 3 ha. There are not believed to be any proposals to release the site from use by the armed services at present, but if it does come forward for development, the application of Policy H2 would be helpful to ensure the development takes full advantage of opportunities to create additional housing.

- The eastern element of the extension (between Camden Town/ Eversholt Street and the King's Cross Opportunity Area identified in the London Plan) is an area that has undergone significant change in recent years, and is subject to significant pressure for non-residential development. Based on recent non-residential developments in this eastern element, and allocations in the draft Local Plan, this element is considered to have potential to add significantly to the borough's housing supply with the application of Policy H2 Part B. The paragraphs below discuss this more fully.

18.5 In the period prior to preparation of the Camden Local Plan 2017, those parts of the South Camden sub-area outside the CAZ and the town centre of Camden Town were under pressure for development of commercial spaces to provide housing. The impact of this can be seen on St Pancras Way (which forms the eastern boundary of site allocation S7, and the western boundary of site allocations S8 and S22), where residential uses have been introduced on all the former canal-side wharf sites from no. 8 to no. 40. The extent of this pressure suggests that residential uses in the area were more valuable than commercial uses before 2017.

18.6 However, in recent years, the value of commercial uses has begun to exceed the value of residential uses in this part of the south sub-area outside the CAZ. This shift has followed from:

- the success of the King's Cross Opportunity Area in attracting a variety of high value employment uses, including Google in 2016 and subsequently many other technology businesses;
- the creation of a partnership in 2014 to promote the Knowledge Quarter across an area spanning a 1 mile radius from King's Cross Station – this radius includes almost all of the south sub-area (including the King's Cross Opportunity Area and most of the CAZ), and a large part of Camden Town.

18.7 Schemes approved in this area since the adoption of Camden Local Plan 2017 that could potentially have made a greater contribution to housing supply had the specific requirements of Policy H2 applied include:

- Former St Pancras Commercial Centre, 63 Pratt Street, completed 2025 (2019/4201/P, 33 additional homes including 14 affordable homes, 17,211 sqm additional non-residential floorspace, primarily offices);

- 6 St Pancras Way, under construction (2017/5497/P, 2021/2671/P, 73 additional homes including 33 affordable homes, over 46,000 sqm additional non-residential floorspace, primarily offices and lab-enabled space) – this is included in the draft Local Plan as Allocation S22.

18.8 Sites in the western element of this extension to the range of Policy H2 Part B will be allocated by the Euston Area Plan. However, the Local Plan includes five allocations in the eastern element (in addition to Allocation S22 above), S5 to S8 and S10. Together, these five allocations have a total indicative housing capacity of 1,390 additional homes, over 66% of the total of 2,119 homes from mixed-use allocations in the south sub-area. As explained in response to question 17 above, the Council considers that if the scope of Policy H2 is not extended to include the entire south sub-area, the borough's housing supply over the Plan period would diminish by 1,390 homes from these allocated sites alone. Further homes would also be lost from non-residential developments arising on sites that have not yet been identified that are within the south sub-area but outside the CAZ.

18.9 Taking all these factors into account, the Council considers that the defined areas of high public transport accessibility where Policy H2 Part B seeks a contribution to permanent self-contained housing is fully justified.

## **19. Is the threshold of 200sqm or more justified and effective?**

19.1 The Council's mixed-use policy has been in place in broadly the same form for twenty years (since adoption of the Camden Replacement UDP in June 2006), with the 200 sqm threshold included throughout. The threshold was found to be sound during Public Examination of the Camden Local Plan 2017 and previous Plans.

19.2 Local Plan paragraph 7.48 explains the 200 sq m threshold, noting that 200 sqm (GIA) is based on the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development. This is consistent with the threshold of 100 sqm (GIA) for affordable housing included in both Policy H4 of the proposed Local Plan and the Camden Local Plan 2017. As indicated in proposed Local Plan paragraph 7.114, the assessment that developments can achieve an average of no more than 100 sqm GIA per home arises from the nationally described space standard in association with the mix of dwelling sizes sought by Local Plan Policy H7. Based on the nationally described space standard, the size of single-storey homes (flats are the most common form of new homes in Camden, particularly in the central sub-area and the town centres) can vary from 37 sqm GIA for a 1-bedroom 1-person home to 99 sqm GIA for a 4-bedroom 6-person home and 125 sqm GIA for a 6-bedroom 8-person home. Allowing 25% for the ancillary space required (such as common circulation and bin and cycle storage), the space standard indicates that 75 sqm GIA potential provides two x 1-bedroom 1-person homes, or a single larger home up to 3-bedroom 4-person in scale.

19.3 The Council notes that where on-site delivery of housing would result in spaces of unsatisfactory quality, Policy H2 Parts B.5a and B.8 provide flexibility for off-site delivery of housing, or exceptionally a payment-in-lieu. The Council further notes that Policy H2 Part B.6 and B.8 together with supporting paragraph 7.54 indicate that there is flexibility for developments involving an additional floorspace of under 2,000 sqm (GIA) to provide payments-in-lieu in place of the affordable housing sought as part of the self-contained housing in a mixed-use scheme. This is consistent with the provisions in Policy H4 Parts B.9 and B.10 together with supporting paragraph 7.135, which indicates that payments-in-lieu of affordable housing are appropriate from schemes involving an additional residential floorspace of under 1,000 sqm (GIA).

19.4 The mixed-use policy has delivered many successful mixed-use schemes in Central London. Whilst a contribution in the form of a payment-in-lieu is generally accepted for the majority of schemes involving between 200 sqm and 1,000 sqm (GIA) additional non-residential floor area, a number of schemes have also involved the provision of on-site housing, including:

- 60-70 Shorts Garden and 14-16 Betterton Street, recently completed (2017/2204/P, 4 additional homes);
- Arthur Stanley House, 40-50 Tottenham Street, recently completed (2017/4306/P, 10 additional homes including 2 affordable homes); and
- 247 Tottenham Court Road and adjoining properties, near completion (2020/3583/P, with 8 homes including 2 net additional homes/ 827 sqm net additional residential GIA).

19.5 Taking all these factors into account, the Council considers that the Policy H2 threshold of 200sqm (GIA) or more is justified and effective.

**20. Given the Viability Study identifies that the viability of office led schemes varies by location, how will a 50% self contained housing requirement be deliverable across all defined high accessibility areas. Is the requirement justified and effective?**

20.1 The response to question 17 above sets out general factors that demonstrate that the requirement for a mix of uses is justified and effective. In summary:

- the existing policy was found to be sound during Public Examination of the Camden Local Plan 2017;
- Policy H2 is necessary to address the housing requirements identified by Policy H1;
- the inclusion of housing increases safety and security, reduces the need for commuting, supports shops and services, and maintains the borough's existing mixed-use character;
- provision of housing strengthens the substantial population already living in the CAZ, with the three pre-2022 wards wholly contained within the CAZ providing 16% of the borough's usual residents across just 13% of its area;

- the mixed-use policy is expected to deliver over 2,000 homes in the south sub-area alone; and
- the mixed-use policy has successfully delivered many schemes combining housing with non-residential use – recent examples are provided in response to questions 17 and 19 above.

20.2 In relation to the target for housing to form 50% of the additional floorspace where Policy H2 Part B applies, this is to ensure that growth in employment space is matched by growth in residential space (and growth in the nearby workforce).

20.3 The 50% housing target is not a fixed requirement. Policy H2 is a criteria-based policy, excluding some forms of development from its provisions, and providing for the policy to be satisfied in a variety of ways depending on the constraints affecting the development (for example, by excluding the market element of the housing sought, by delivering housing off-site, or by making a payment-in-lieu). Some of the potential approaches to satisfying the policy are illustrated by the examples provided in response to questions 17 and 19 above. Furthermore, Policy H2 Part C.7 provides for applicants to submit viability evidence to justify provision of less than 50% self-contained housing, or a lower level of payment-in-lieu than would be anticipated by Local Plan 7.62.

20.4 The Camden Local Plan Viability Study 2025 (EB01) reports the outcome of the viability testing of Policy H2 requirements for self-contained housing in non-residential developments in paragraphs 6.34 to 6.44. The non-residential uses tested were offices, lab-enabled research space and hotels. Lab-enabled research was only tested in the south sub-area as the viability consultant (BNP PRE) has indicated that the delivery of such space is localised around institutions and other companies in the same sector. The Study's concluded that:

- The results of the viability testing identified that office-led mixed-use developments in the Central Area / Zone 1 / King's Cross area, which achieve the highest rents in the Borough, show good viability with respect to the delivery of self-contained residential accommodation, including affordable housing, alongside commercial development. Offices in Camden Town achieve the next highest rents in the Borough and the results of our testing indicate that office-led mixed-use schemes are viable on lower value existing use sites and where residential values in excess of £1,000 per sq ft are achieved. Viability testing of office-led mixed-use schemes in the Finchley Road and Swiss Cottage area are shown to be viable on lower value existing use sites and where higher residential values are secured.
- The results of appraisals testing the viability of mixed-use schemes including lab-enabled research space in the south of the Borough/Central Area demonstrate that the requirements of Policy H2 along with the requirements of Policy H4 are viable.
- Appraisals testing hotel-led mixed-use developments including self-contained residential accommodation demonstrate good viability where higher hotel capital values and residential sales values are achievable, i.e. in the South of the Borough / Central Zone area, however this viability is only seen against sites in

lower existing use values. So, at present, where sites are in a higher existing use, they would remain in their existing use. In these instances, it is not the Council's policy making development unviable, but rather market factors, i.e. hotel capital values and costs as compared to existing use values and alternative uses for sites. In the rest of the Borough, lower hotel capital values are achievable and as a consequence viability is only shown in scenarios where higher residential sales values are achieved.

- 20.5 In relation to the variation in the viability of office-led schemes by location and the deliverability of the 50% target, the Council further notes that:
- the viability study examines developments with 50% non-residential floorspace and 50% self-contained housing floorspace, and assesses the impact of differing percentages of affordable housing on viability – it does not assess the impact of differing percentages of self-contained housing floorspace;
  - where schemes led by non-residential uses are shown to be non-viable, this is often a consequence of the existing use having a higher value rather than the Council's policy;
  - in locations where office values are low relative to housing, the inclusion of market housing would be expected to improve viability, although it may not be viable to include the percentage of affordable housing sought by Policy H4;
  - given the variation in office viability, if the fully policy-compliant percentage of affordable housing is taken as fixed, there will not be a particular level of self-contained housing that most schemes can viably deliver – but setting a percentage of self-contained housing below 50% would reduce the borough's overall housing supply (see the response to question 17 above for assessment of the scale of the contribution to housing supply from Policy H2);
  - the relationship between residential and commercial values varies over time in each location, so locations where office-led development is not viable at present may be viable for office-led development later in the Plan period – in relation to this, the Council notes the sensitivity testing for a value-growth scenario included in the viability study, and the impact of value-growth on viability. This impact is particularly apparent in the Strategic Sites Viability Testing (EB09), for example see Tables 4.12.2 and 4.14.2 on pages 22 and 23.
- 20.6 As indicated in response to question 18 above, the Local Plan proposes to remove the town centre of Kilburn High Road from the scope of Policy H2 Part B. The Council's assessment of schemes determined since 2017 where delivery of housing has been sought under Policy H2 found no approved developments in that town centre involving the creation of additional non-residential floorspace. This reflects the relatively low viability of office-led development in Kilburn High Road.
- 20.7 Taking all these factors into account, the Council considers that the target for housing to form 50% of the additional floorspace where Policy H2 Part B applies is justified and effective.

- 21. With reference to Policy H2: Does the policy provide sufficient flexibility in the type of housing provided?**
- 21.1 Policy H2 specifies that the type of housing sought in conjunction with additions to non-residential development is permanent self-contained homes. This housing could be in the form of build for sale development or build to rent development. Self-contained homes can also potentially be shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (small houses in multiple occupation or HMOs, in Use Class C4).
- 21.2 The type of housing sought reflects the priority land-use of the Local Plan set out in Policy H1, and explained in supporting paragraphs 7.10 – 7.14. In summary:
- the term permanent distinguishes long-term homes from short-term lets or visitor accommodation, which is let for periods of less than 90 days;
  - self-contained housing offers the greatest flexibility to accommodate a wide variety of household types; and
  - self-contained housing offers the best prospect of delivering affordable housing in the context of very high affordable housing need from households with limited incomes. (The Camden Local Housing Needs Assessment 2025 (EB10) indicates that the need for low-cost rented housing will exceed 50% of anticipated housing supply over the Plan period.)
- 21.3 Policy H2 does not provide for purpose built student accommodation (PBSA) or large-scale purpose-built shared-living (LSPBSL). As indicated by Local Plan paragraph 7.145, the London Plan provides for the affordable housing contribution for these types of housing respectively to take the form of affordable student accommodation or a payment-in-lieu. The Council further notes that Policy H2 is unlikely to generate housing requirements that would be large enough to support the on-site management generally expected for PBSA or LSPBSL, or to attract established national or regional operators of such accommodation. Without effective management arrangements, such accommodation is less likely to support students at local universities or the local workforce, and more likely to be used as short-term lets and visitor accommodation.
- 21.4 Student accommodation and large-scale shared-living are supported in more general terms by Policy H1 Part B2, and in specific terms by Policies H9 and H10 respectively. We further note that as these are both forms of housing, they can be developed independently in the defined areas of high public transport accessibility specified by Policy H2 without themselves triggering the requirements of Policy H2 Part B.
- 21.5 Taking all these factors into account, the Council considers that Policy H2 provides an appropriate level of flexibility in the type of housing provided.

- 22. To what extent do the policy requirements reflect the indicative site capacities identified for site allocations?**
- 22.1 Indicative housing capacities included in the Local Plan have been devised taking account of the full range of policies that will apply to the site. Indicative housing capacities for those sites allocated for a mix of uses and falling within the defined areas of high public transport accessibility have taken account of the requirements of proposed Policy H2. Further information on the approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).
- 22.2 Typically, sites in the defined areas of high public transport accessibility (essentially the south sub-area and the two larger town centres) are allocated for a mix of uses unless they relate to land on Council-owned housing estates. In some cases, a planning application has already been approved having regard to Policy H2 of the Camden Local Plan 2017, and the approved development has informed the indicative housing capacity. In other cases, a design-led assessment of the site's development capacity has been carried out (in terms of scale, mass and floor area), and Policy H2 has been applied to generate an indicative housing capacity.
- 22.3 The indicative housing capacities have not in any way informed the requirements of Policy H2, which has operated in broadly the same form for over 20 years. However, when the Local Plan is adopted, the indicative capacities will form part of the planning framework, and be considered alongside Policy H2 in determining planning applications for allocated sites.
- 22.4 Guidance on the operation of the indicative housing capacities is provided by Local Plan paragraphs 1.38 to 1.40. These note that the capacities are not fixed figures to be adhered to exactly, that the development capacity of the site may increase if the demolition of existing buildings is shown to be acceptable, and that a larger number of homes may be acceptable subject to local context, heritage constraints, and satisfactory levels of amenity for neighbours and occupiers.
- 22.5 Many site allocations also include guidance on the relationship between indicative housing capacities and Policy H2, although this is not entirely uniform given the varying characteristics of sites and their proposed uses (e.g. the extent to which health or education uses are proposed). Examples used for several sites include:
- within the table giving the Indicative Housing Capacity – "A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2. This has been assessed as [site-specific number] additional self-contained homes in the context of the development permitted, but should relate to the scale of all additional floor area (GIA) proposed" (for example, included in Allocation S11);
  - within the Development and Design Principles – "Development must... optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area proposed" (for example, included in Allocation S7).

- 22.6 The Council does not consider that it would be appropriate to add a specific reference to indicative housing capacities in Policy H2. The Local Plan should be read as a whole, as confirmed by Local Plan paragraph 1.44. Furthermore, the indicative housing capacities should not override the requirements of Policy H2 - in the context of the borough's high housing requirements and limited housing land supply, in the event that the scale, mass and floor area acceptable on a site is greater than anticipated at the time the indicative capacity was assessed (for example, due to a successful case being made for demolition), the Council considers that a proportionate increase in amount of housing should also be sought.
- 22.7 Taking all these factors into account, the Council considers that the Local Plan expresses the relationship between Policy H2 and the indicative housing capacities in a way that is justified and effective.

### **23. Is the relationship between Policy H2 and H4 clear?**

- 23.1 The Council considers that the relationship between Policies H2 and H4 Maximising the supply of affordable housing is clearly set out in the Local Plan.
- 23.2 Policy H2 and supporting paragraphs make direct reference to the requirements of Policy H4 in explaining the interaction between the two policies. Key elements of the explanation include:
- part B.5 indicates that the self-contained housing target is sub-divided to provide an affordable housing target and a market housing target - this is further explained by supporting paragraph 7.53, which indicates that the starting point is the additional floorspace proposed;
  - part B.6 indicates that where developments involve an additional floorspace of 2,000 sqm (GIA) or more, affordable housing should be provided on site – this is further explained by supporting paragraph 7.54, which indicates that this is consistent with provisions associated with Policy H4 that provide flexibility for payments-in-lieu of affordable housing from schemes involving a residential floorspace of under 1,000 sqm, but expect on-site delivery of affordable housing from larger schemes;
  - part B.7 indicates that where the self-contained housing target cannot be met in full, we will prioritise the on-site delivery of affordable housing – this is justified and further explained by supporting paragraph 7.55, which refers to past examples of schemes considered under Policy H2 which have only delivered the affordable housing element; and
  - supporting paragraph 7.56 confirms that the London Plan viability thresholds apply where the floorspace sought for self-contained housing has capacity for 16 or more homes, but indicates that the Council will encourage developments that solely provide 50% of the self-contained housing required as affordable housing, rather than delivering the full target level of self-contained housing alongside a lower viability threshold level of affordable housing.

- 23.3 Key elements of Policy H4 and supporting paragraphs that inform the approach to affordable housing in Policy H2 include:
- parts B.2 to B.4 explain the relationship between proposed housing floorspace and the affordable housing target, while additional detail about the sliding scale target is provided by supporting paragraphs 7.114 – 7.117;
  - supporting paragraph 7.135 confirms that the Council will continue to accept payments-in-lieu of affordable housing from proposals with capacity for fewer than 10 additional homes (i.e. a floorspace below 1,000 sqm GIA when rounded to the nearest 100 sqm); and
  - parts B.1 and B.5 indicate that London Plan viability thresholds apply to developments with capacity for 16 or more additional homes, while supporting paragraph 7.121 confirms that where Policy H2 is engaged, the Council will encourage developments that solely provide 50% of the self-contained housing required as affordable housing, rather than delivering the full target level of self-contained housing alongside a lower viability threshold level of affordable housing.
- 23.4 Further detailed guidance on the relationship between the mixed-use policy and the affordable housing policy is set out in the Council's Camden Planning Guidance: Housing supplementary planning document (LD30).

**24. Are the exclusions identified in the policy where a requirement is not required comprehensive and justified?**

- 24.1 The Council considers that the circumstances specified in Policy H2 where no housing requirement will apply are comprehensive and justified. Exclusions from the requirements (along with details of how the requirement will apply) are contained in Part B. Other factors which may warrant relaxation of the Policy H2 requirements are set out in Part C.
- 24.2 The exclusions in Part B are justified as follows:
- the initial sentence indicates that no housing is sought where additional floorspace of under 200 sqm (GIA) is proposed – the 200 sqm threshold is based on the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development;
  - clause 2 indicates that no housing is sought in Hatton Garden where equivalent jewellery workspace is provided – the Council's priority is to support the nationally important cluster of jewellery manufacture and trading that gives the area its special character;
  - clause 3 indicates that housing is not required from elements of a development that are secured as serving a public purpose – this is explained in Local Plan paragraph 7.50, which lists facilities like hospitals and museums that would be covered, notes that some of these are not compatible with housing, and also notes that it would not be possible to divert public funding intended to deliver a particular facility into the delivery of housing; and

- clause 4 indicates that the 50% target is not applied to retained or replacement floorspace - this ensures that the policy does not compromise valued non-residential uses that characterise the Central Activities Zone and Town Centres.

24.3 Factors in Part C that may warrant relaxation of Policy H2 requirements include:

- in clause 3 - the extent of any additional floorspace needed for an existing user – the Council seeks to ensure that existing users can expand without needing to relocate;
- in clause 4 – needs of the CAZ, particularly strategic functions and specialist clusters – this is explained in paragraph 7.68, which acknowledges the Knowledge Quarter as a relevant consideration; and
- in clause 5 – land involved in development of the Euston Stations and rail infrastructure – this is explained in paragraph 7.69, which notes the potential for a 'portfolio' approach and the need for proposals to accord with the Euston Area Plan (which has ambitious housing objectives).

24.4 With the exception of matters relating to Euston rail infrastructure, the exclusions and factors justifying relaxation were also considerations in Policy H2 of the Camden Local Plan 2017, albeit in a different form, and found to be sound at Public Examination. Through the draft Local Plan, the Council has sought to refine these by making a clear distinction between those exclusions in Policy H2 Part B, which would not be compatible with the delivery of any housing, and those in Policy H2 Part C, which could potentially allow for delivery of a lower proportion of housing, or alternatively off-site delivery or a payment-in-lieu.

24.5 One response to the Local Plan consultation proposed that Policy H2 should identify sites other than Euston (specifically site allocation C17 Camden Town over station development) where requirements for transport infrastructure may warrant relaxation or exclusion from housing requirements. The Council considers that sufficient flexibility is already provided by Policy H2 Part B.3 and supporting paragraph 7.50, which specifically refers to transport infrastructure and facilities. The Council also does not consider it necessary or helpful to seek to list all sites where transport infrastructure is present and Policy H2 Part B.3 may be applicable, which potentially includes a wide range of allocated sites above, adjacent or closely related to transport infrastructure, including S9 (Shorebase Access), S13 (Former Thameslink Station, Pentonville Road), S26 (8 - 10 Southampton Row) and C11 (Network Rail land at Juniper Crescent), as well as C17 (Camden Town over station development).

24.6 A further response related to proposals at Euston, and proposed an amendment to Policy H2 Part A seeking to exclude areas covered by a large-scale masterplan. The Council would not support such an amendment. It is unclear what would constitute a large-scale masterplan and whether such a masterplan would need to be approved by the Council. It is also unclear how such an amendment would influence the specific requirements set out in Policy H2 Part B, and which is to apply throughout the part of the borough covered by the Euston Area Plan. The Council considers that the measures included in Policy H2 Part C.5 and supporting paragraphs 7.58 and 7.69 are sufficient to meet the challenges of applying Policy H2 to sites associated

with Euston rail infrastructure. These measures include flexibility to provide for consideration of a 'portfolio' approach to sites in the same ownership, and for land-use swaps and credits to facilitate off-site delivery.

**25. How does the requirement for residential development within non-residential schemes affect the economic objectives of South Camden and the CAZ?**

**26. Does the mixed use policy align with Policy SD4 and SD5 of the London Plan regarding the strategic functions of the CAZ?**

25.1 This response seeks to address questions 25 and 26 above together.

25.2 Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. Local Plan Policy H2 has been established over for 20 years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision.

25.3 The Council considers that Policy H2 assists rather than harms the borough's commercial attractiveness. Supporting paragraph 7.40 notes that the inclusion of housing can help to overcome the loss of customers for shops and services arising from increased home-working and less consistent occupation of workplaces, while paragraph 7.45 notes that additional housing in these specified locations will help provide activity and surveillance when businesses are closed, enliven marginal areas at the periphery of established frontages, and support local facilities. The policy helps to protect and enhance the borough's well-established mixed-use character, and in turn helps to sustain the Central Activities Zone and key Town Centres where the policy applies.

25.4 The Council does not consider that Local Plan Policy H2 is in conflict with the NPPF or the London Plan since Part C.4 specifically recognises CAZ strategic functions and specialist clusters, and the policy provides for:

- all existing non-residential floorspace to be retained or replaced;
- the addition of up to 200 sqm GIA of floorspace without triggering any floorspace requirement; and
- non-residential use of at least 50% of the additional floorspace.

25.5 Paragraph 7.68 recognises that "In some areas, there may be local priorities to be balanced against the priority given to housing, particularly in the Central Activities Zone (CAZ). The town centres and the CAZ provide frontages that are key to the area's retail and service function, and these should not be compromised by the introduction of alternative uses or extensive entrance lobbies. The CAZ also supports some uses that have a national or international function and make major contributions to Camden's economy, and their needs will be given significant weight."

- 25.6 Policy H2 incorporates a great deal of flexibility, including flexibility for applicants to make a case for on-site or off-site provision of housing, a reduced proportion of housing, or a payment-in-lieu. Local Plan paragraph 7.60 further states that "As part of the consideration of off-site options we will explore with developers whether the housing could be delivered on Council-owned land".
- 25.7 The Statement of Common Ground between the Council and the Mayor of London (SD19) does not identify office development, strategic functions of the CAZ or the Local Plan's mixed-use policy as key strategic matters. However, the table of GLA representations and LB Camden responses included in SD19 addresses both office development and the Central Activities Zone in the rows on pages 24-26, and confirms that the Mayor of London accepts the Council's position. In relation to the CAZ, the agreed position is as follows:  
"The Local Plan Policies Map shows the boundary of the CAZ in Camden. It is considered that the approach taken in the Local Plan aligns with Policy SD4 of the London Plan. Policy S1 - South Camden states that CAZ (and Knowledge Quarter) will continue to be the main focus of employment development in Camden (Part K). It supports the specialist clusters of activity in the CAZ (Part M), as well as the CAZ retail clusters and Specialist Shopping Areas (Part S). Policy H2 - Maximising the supply of self-contained housing from mixed-use schemes is applied taking into account any floorspace needed for particular Central Activities Zone (CAZ) activities, having regard to CAZ strategic functions and specialist clusters recognised by the London Plan, and designations in the Plan (Part C.4). Policies A1 - Amenity and A4 - Noise and vibration set out the Plan's approach to the agent of change principle."
- 25.8 The relationship between Local Plan Policy H2 and London Plan Policies SD4 and SD5 is also addressed in the Council's response to Matter 1 question 31. This concludes that:
- the provisions in Policy H2 are a local variation to the provisions of the London Plan; and
  - the Local Plan is in general conformity with London Plan, as confirmed by the Statement of Common Ground between the Council and the Mayor of London (SD19) and the Council's letter to the Inspector dated the 12 December 2025 (ED03r).

### **Policy H3**

#### **With reference to Policy H3:**

- 27. How does Policy H3 D.1 align with Camden's objective to maximise housing supply?**
- 28. How does consolidation affect the availability of smaller, more affordable market units?**
- 27.1 This response addresses questions 27 and 28 together.

- 27.2 Policy H3 seeks to protect existing homes in the borough. It states that the Council will resist development affecting existing houses and flats that would result in the net loss of homes, unless the circumstances set out in Part D criteria 1 - 4 apply. Part D criterion 1. of Policy H3 relates to circumstances when development amalgamates homes to create one larger home and results in the net loss of a single home.
- 27.3 Policy H3 D.1 continues the approach set out in Policy H3 Protecting Existing Homes in the current Local Plan 2017 (LD01), which was found sound at public examination and is considered to be operating effectively.
- 27.4 The loss of a single dwelling through works to combine two flats within an existing residential block of flats or apartments will often not constitute development, and therefore, in such cases, the loss is not something that can be controlled through the operation of the Plan's policies.
- 27.5 The loss of housing from such developments adds to the amount of housing required to meet the borough's housing targets, but this is not considered to directly affect the Council's objective of maximising housing supply or the approach to meeting this objective set out in the draft Local Plan.
- 27.6 Each loss of an individual home may reduce the number of smaller, relatively affordable market dwellings. However, amalgamation to create a larger home contributes towards meeting identified demand. The Council's Local Housing Needs Assessment (EB10) found that the greatest requirement for market housing over the Plan period is likely to be for 3 bedroom homes (draft Local Plan paragraph 7.206). The approach is consistent with the ambition of We Make Camden to secure family-friendly housing to support our communities and with objectives 3 and 6 of the draft Local Plan. As noted in paragraph 7.86 of the Plan, amalgamation to create a larger home can have the benefits of helping families to deal with overcrowding, to grow without moving home, or to care for an elderly relative.

## **Policy H4**

### **With reference to Policy H4:**

- 29. Is the policy consistent with national policy and in general conformity with the London Plan?**
- 29.1 Local Plan Policy H4 Maximising the supply of affordable housing seeks to maximise the supply of affordable housing in Camden to meet the needs of households unable to access market housing.
- 29.2 NPPF paragraph 63 states that, within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include those who require affordable housing, including Social Rent. These needs are addressed by Policy H4.

- 29.3 Policy H4 is also consistent with NPPF paragraph 64, which states that planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 29.4 The NPPF advises that affordable housing should only be sought from major developments involving housing (paragraph 65). Draft Local Plan Policy H4 maintains the approach taken in the Local Plan 2017 (in Policy H4 Maximising the supply of affordable housing), which seeks an affordable housing contribution from all schemes that provide one or more additional homes and also involve a total addition to housing floorspace of 100 sqm GIA or more. The Planning Inspector who held the examination into the adopted Camden Local Plan 2017 concluded that there were specific local circumstances in the case of Camden - in terms of the scale of affordable housing need in the borough and the particular constraints regarding options to increasing housing delivery - to justify a departure from national policy, and supported the approach as justified and deliverable.
- 29.5 Policy H4 maintains the position in the Local Plan 2017 as the case for seeking affordable housing contributions from schemes below the national threshold continues to apply, as evidenced by Camden's Local Housing Needs Assessment (EB10), which indicates that around 60% of the anticipated housing supply would be required to meet the need for low-cost rented housing.
- 29.6 The Council's threshold for seeking contributions to affordable housing, and our approach to contributions from smaller developments, have been devised to minimise the risk of suppressing the delivery of homes, and have operated successfully since adoption of the Camden Local Plan 2017. The policy has secured the delivery of 1,537 (net) affordable housing completions since 2017/18 and secured over £60 million in financial contributions in lieu of affordable housing provision on-site over the same period.
- 29.7 Policy H4 maintains the approach from the Local Plan 2017 which seeks to prevent the risk of negative impacts from seeking affordable housing contributions from small schemes through the use of a sliding scale for affordable housing from smaller developments which have capacity for 15 or fewer additional homes, and providing flexibility for payments-in-lieu of affordable housing from developments with capacity for fewer than 10 additional homes.
- 29.8 It is therefore considered that, while the approach taken to affordable housing delivery differs from national policy, it is justified by local circumstances, given the scale of affordable housing need in Camden, and the need to optimise the delivery of new affordable homes to meet this need.
- 29.9 Local Plan Policy H4 is in general conformity with the London Plan, as confirmed by the Statement of Common Ground between the Council and the GLA (SD19 - see paragraph 4.3 and the Table of GLA representations and LB Camden response).
- 29.10 The strategic target of 50% and the viability threshold approach arising from London Plan Policies H4 and H5 are supported by the Local Plan as follows:

- the strategic target is confirmed by Local Plan Policy H4 Part A and Part B.5;
- the viability thresholds are reflected in Local Plan Policy H4 Part B.5 and supporting paragraphs 7.118 – 7.120;
- Local Plan paragraph 7.120 confirms that the Council will apply the latest London Plan viability thresholds to larger developments with capacity for 16 or more additional homes (reflecting London Plan Policy H4 Part A.1);
- Local Plan paragraph 7.120 also indicates that a viability threshold of 50% applies to industrial land and public sector land (reflecting London Plan Policy H4 Parts A.4 and A.5);
- Local Plan Policy H4 part B.9 confirms that affordable housing should be provided on site wherever practical (reflecting London Plan Policy H4 Part B); and
- Local Plan Policy H4 part F and paragraphs 7.119, 7.155 and 7.156 confirm that early stage, late stage and mid-term viability reviews will be sought (reflecting London Plan Policy H5 Parts E and F).

29.11 The Local Plan proposes some measures to support delivery of additional affordable housing that are distinct from the London Plan approach. These have been adjusted from the Camden Local Plan 2017 and its predecessors through negotiation with the GLA to achieve general conformity with the London Plan. The distinctive measures are as follows:

- use of affordable housing targets on a sliding scale for smaller developments that have capacity for 15 or fewer additional homes, as set out in Local Plan Policy H4 Part B.4 and paragraphs 7.114 to 7.117. The sliding scale progresses from 2% to 30%, and has been designed to achieve the maximum reasonable contribution overall without deterring development or suppressing scheme size through a high starting target;
- seeking affordable housing contributions on the sliding scale from non-major developments as a departure from the NPPF (as explained in Local Plan paragraphs 7.108 - 7.109 and previously found to be sound through public examination of the Camden Local Plan 2017); and
- providing flexibility for affordable housing contributions in the form of payments-in-lieu from non-major development (as explained in Local Plan paragraph 7.110).

29.12 In drafting Local Plan Policy H4, the Council has sought to ensure that the policy can be understood in its own right (without constant reference to the London Plan). The drafting has also taken place in the context of the early stages of a review of the London Plan, which might choose to amend the current viability thresholds of 35% and 50%, so the Council has sought to avoid entrenching those in the wording of Local Plan policy.

29.13 The Council notes that footnote 50 in the London Plan 2021 indicates that "Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites", although London Plan Policy H2 does not make any reference to affordable housing.

29.14 The Council has proposed two minor modifications to the supporting text of Policy H4 to clarify the relationship between the Local Plan and London Plan Policies H5 and H6 (SD50 reference NMM03 and NMM04). Modifications to paragraph 7.124 confirm that the Council intends to adhere to the guideline mix of affordable housing types set out in Local Plan Policy H4 Part B.6. Modifications to paragraph 7.154 confirm that the consideration of financial viability is only expected at the application stage where proposals do not reach the relevant London Plan viability thresholds, or where smaller developments do not meet the sliding scale target set out in Local Plan Policy H4 Part B.4. Paragraph 4.3 of the Statement of Common Ground with the GLA (SD19) makes reference to these modifications, and the GLA have confirmed that the Local Plan reflects the approach of the London Plan in respect of the affordable housing thresholds.

**30. What evidence underpins the borough wide target of 3,000 additional affordable homes between 2026/27-2040/41?**

- 30.1 The boroughwide target of 3,000 additional affordable homes between 2026/27-2040/41 in Draft Local Plan Policy H4 is underpinned by the London Plan 2021 and evidence of London-wide and Camden-wide needs, and past Camden delivery.
- 30.2 The strategic target of 50% referred to in Local Plan Policy H4 Part A and Part B.5 arises from London Plan Policy H4 Part A. As set out in Local Plan paragraph 7.105, the London Plan strategic target is based on the findings of the London Strategic Housing Market Assessment 2017 that 47% of the housing need in London would be for low-cost rented housing and a further 18% would be for intermediate housing. Camden's Local Housing Needs Assessment found a broadly similar range of affordable housing needs, but with as much as 60% of anticipated housing supply being required to meet the need for low-cost rented housing.
- 30.3 The approach to setting the Local Plan's affordable target is explained in Draft Local Plan paragraph 7.106 which states that:
- "To set this Plan's target for affordable housing we have taken the overall housing target (including market housing), and estimated the maximum number of affordable homes likely to be viable and deliverable, taking into account affordable housing need, the relationship between development costs, the value of market and affordable homes, the funding available from the Mayor's Affordable Homes Programme, the income households have to spend on housing, past levels of delivery and the anticipated housing output of the Council's Community Investment Programme. Balancing these considerations, this Plan sets a delivery target of 3,000 additional affordable homes over the Plan period (200 per year)."
- 30.4 Local Plan Policy H4 Part A reflects the guidance in NPPF paragraph 16 that plans should be aspirational but deliverable. The Camden Local Housing Needs Assessment 2025 (EB10) found that the need for low-cost rent alone over the period will be for 6,286 homes (419 per year). Paragraph 7.111 of the Local Plan notes that over the first five years of Camden Local Plan 2017 period (2016-2021) 923

additional affordable homes were delivered (184.6 per year). In that context, the Council considers that a target of 3,000 affordable homes is ambitious but achievable.

30.5 The GLA have confirmed that Local Plan Policy H4 is in general conformity with the London Plan (RD01) (see SD19 paragraph 4.3 and the Table of GLA representations and LB Camden response).

**31. With reference to Policy H4: The Viability Study finds that there is no uniform level of affordable housing that can viably be delivered across the borough. How has the Council ensured that the 50% strategic target is deliverable?**

31.1 The Council notes that the 50% strategic target forms the core principle of Policy H4 of the London Plan 2021. The Local Plan is required to be in general conformity with the London Plan. The Statement of Common Ground between the Council and the Mayor of London (SD19) confirms that the Local Plan is in general conformity with Policies H4 and H5 of the London Plan 2021 – see paragraph 4.3 and the Table of GLA representations and LB Camden response.

31.2 In broad terms, the strategic target is justified by the evidence summarised in paragraph 7.105 of the Local Plan. The London Strategic Housing Market Assessment 2017 found that 47% of the housing need in London would be for low-cost rented housing and a further 18% would be for intermediate housing. Camden's Local Housing Needs Assessment 2025 found a broadly similar range of affordable housing needs, but with as much as 60% of anticipated housing supply being required to meet the need for low-cost rented housing. Further details are provided in response to question 7 above, see particularly paragraph 7.7.

31.3 The Council notes that the 50% strategic target included in the London Plan and Local Plan Policy H4 is not a fixed requirement that applies to each individual development. Local Plan Policy H4 is a criteria-based policy, excluding some forms of development, and including several areas of variation and flexibility, such as the following:

- Policy H4 only applies to developments that provide both:
  - one or more additional homes; and
  - additional housing floorspace of 100 sqm GIA or more;
- Policy H4 part B.1 and part B.4 indicate that a sliding scale target from 2% to 30% applies to developments with capacity for 15 or fewer additional homes;
- Policy H4 part B.5 indicates that developments with capacity for 16 or more additional homes will be subject to the London Plan's viability threshold approach – these are set out in London Plan Policy H5 and summarised in Local Plan paragraph 7.120, which notes that the 35% threshold will apply to most larger developments involving housing that come forward in Camden;
- Policy H4 part B.10 provides flexibility for off-site provision and payments in lieu of affordable housing;

- Policy H4 parts D and E provide flexibility in relation to particular forms of housing development and the particular characteristics of the proposal, including provision for applicants to submit viability evidence to justify inclusion of a lesser affordable housing provision than is sought by the relevant sliding scale target or the relevant London Plan viability threshold.

31.4 In essence, the strategic target might more properly be described as a strategic objective. It rests to some extent on measures that are outside the scope of the Local Plan, such as the use of grant from the Mayor of London's Affordable Homes Programme and agreements between the Mayor of London and affordable housing providers (see London Plan Policy H5 parts A.2 and A.3). Nevertheless, the Local Plan seeks to conform to the terminology employed by London Plan Policy H5.

31.5 The 50% strategic target (or objective) performs an important role in underlining the Council's intention to deliver as much affordable housing as it possibly can. The Council's view is that without this strategic target, less affordable housing would be delivered across the Plan period. The conclusions of the Camden Local Plan Viability Study 2025 (EB01), also quoted above in response to question 10, express the same position, as follows (with emphasis added):

- Paragraph 7.3 states: "Although the NPPF sets an ambition for plan policies to be set in the plan with little use of viability assessments when planning applications are brought forward, this is only a realistic expectation in rural district authorities with homogenous greenfield development. In common with other London boroughs, Camden has a complex range of development scenarios, with development sites that are in various existing uses; significant variation in the types of developments that come forward; and a high degree of variability in residential sales values. **In such circumstances, setting a policy that all schemes can viably deliver would require the level of affordable housing to be set at such a low level, it would be relatively meaningless in terms of meeting affordable housing need. It would be a policy that is determined by the lowest common denominator and schemes that could have viably delivered a higher percentage would no longer be required to do so.**"
- Paragraph 7.4 states: "We therefore support the Council's proposed approach, which maintains its ambitious target for affordable housing, which some schemes can meet over the plan period, but recognises that this will not always be achieved due to site-specific viability issues. This approach is essentially consistent with the existing policy approach both in the adopted Camden Local Plan 2017, and also in the London Plan, which adopts a threshold approach to affordable housing, and has an explicit route for schemes that cannot provide the threshold level of affordable housing. **The threshold percentage itself is set at a lower level for most development (35%) than the London Plan's strategic target of 50%**"
- Paragraph 7.5 states: "In considering the outputs of the appraisals, it is important to recognise that some developments will be unviable regardless of the Council's requirements. In these cases, the value of the existing building or the base costs (excluding policy requirements) will be higher than a redevelopment

opportunity over the medium term. However, this situation should not be taken as an indication of the viability (or otherwise) of the Council's policies and requirements. In these situations, there will be little pressure from owners to redevelop for residential use and they might re-consider the situation when values change over time."

- Paragraph 7.6 states (in part): "We have appraised residential schemes with a range of affordable housing from 0% to 50% to test the ability of development typologies to meet the requirements of draft Policy H4... our appraisals indicate that there are significant variations in the percentages of affordable housing that can be provided depending on private sales values, scheme composition and benchmark land value. The results therefore do not point to any particular level of affordable housing that most schemes can viably deliver. The Council's draft Policy H4 maintains the currently adopted strategic target of 50% (applied on a sliding scale) and takes into consideration the economics and financial viability of site-specific circumstances. Given that this effectively reflects the Council's current practice (albeit with a shortened sliding scale) and also the approach in the 2021 London Plan, **we consider the draft Policy to be reasonable. It allows for sufficient flexibility, both in terms of tenure mix and overall quantum, to enable schemes to come forward with the maximum viable package of affordable housing. Setting a lower proportion of affordable housing would likely result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so.**"

31.6 The Council also considers that the 50% strategic target is relevant to site-specific negotiations, as set out in the Council's response to the GLA's initial representation during the regulation 19 consultation, and in the Statement of Common Ground (SD19, Table of GLA representations and LB Camden response). The Council's response indicates that the Council considers the strategic target to be relevant to specific sites in two ways.

- Firstly, developers are expected to explore whether affordable housing can be increased beyond the viability threshold level using grant from the Affordable Homes Programme (London Plan Policy H4 part A.2 and Policy H5 part C.4 and paragraphs 4.4.4 and 4.5.11).
- Secondly, developments are subject to Early Stage Viability Review and Late Stage Viability Review (London Plan Policy H5 parts E and F.2 and paragraphs 4.5.8 and 4.5.14). We consider that the strategic target has a role in the operation of these Viability Reviews, since the proportion of affordable housing sought through would otherwise be open-ended.

31.7 Based on the conclusions of the viability study and the site-specific role of the strategic target, the Council considers the 50% affordable housing target to be effective in the sense that it helps to maximise affordable housing delivery. Nevertheless, the Council does not believe that the 50% target will be met when considered against the borough's overall housing land supply over the Plan period. As indicated in Local Plan paragraph 7.106 and explained in response to question 30 above, the Council estimates that 3,000 additional homes is the maximum

number of affordable homes likely to be viable and deliverable over the Plan period. This represents 29.5% of the overall supply of 10,181 self-contained homes explained in response to question 7 above (paragraph 7.7).

- 31.8 Taking all these factors into account, the Council considers that the strategic target for 50% affordable housing is justified and effective, although it exceeds the Council's anticipated delivery of affordable housing.

## **32. What is the basis of setting a threshold of 100sqm?**

- 32.1 Policy H4 Part B states that the Council will expect a contribution to affordable housing from all major developments involving housing, and non-major developments that provide one or more additional homes and involve a total addition to housing floorspace of 100 sqm GIA or more. Criterion 2 of Part B states that development capacity will be assessed on the basis that 100sqm (GIA) of housing floorspace creates capacity for 1 home.
- 32.2 Policy H4 maintains the position in the adopted Local Plan 2017, which seeks an affordable housing contribution from all schemes that provide one or more additional homes and involve a total addition to housing floorspace of 100 sqm GIA or more.
- 31.3 As indicated in Draft Local Plan paragraph 7.114, the assessment that developments can achieve an average of no more than 100 sqm GIA per home derives from the nationally described space standard in association with the mix of dwelling sizes sought by Local Plan Policy H7. Based on the nationally described space standard, the size of single-storey homes can vary from 37 sqm GIA for a 1-bedroom 1-person home, to 99 sqm GIA for a 4-bedroom 6-person home, and 125 sqm GIA for a 6-bedroom 8-person home. Allowing 25% for ancillary space (such as common circulation and bin and cycle storage), the space standard indicates that 75 sqm GIA potential provides two x 1-bedroom 1-person homes, or a single larger home up to 3-bedroom 4-person in scale. Single storey flats are the most common form of new homes in Camden, particularly in the central sub-area and town centres.

## **33. Is Policy H4 of the Camden Local Plan in conformity with Policy H4 of the London Plan?**

- 33.1 Local Plan Policy H4 is in general conformity with the London Plan, as confirmed by the Statement of Common Ground between the Council and the GLA (SD19 – see paragraph 4.3 and the Table of GLA representations and LB Camden response).
- 33.2 The strategic target of 50% and the viability threshold approach arising from London Plan Policy H4 is supported by the Local Plan as follows:
- the strategic target is confirmed by Local Plan Policy H4 Part A and Part B.5;
  - the viability thresholds are reflected in Local Plan Policy H4 Part B.5 and supporting paragraphs 7.118 – 7.120;

- Local Plan paragraph 7.120 confirms that the Council will apply the latest London Plan viability thresholds to larger developments with capacity for 16 or more additional homes (reflecting London Plan Policy H4 part A.1);
- Local Plan paragraph 7.120 also indicates that a viability threshold of 50% applies to industrial land and public sector land (reflecting London Plan Policy H4 Parts A.4 and A.5);
- Local Plan Policy H4 part B.9 confirms that affordable housing should be provided on site wherever practical (reflecting London Plan Policy H4 Part B); and
- Local Plan Policy H4 part F and paragraphs 7.119, 7.155 and 7.156 confirm that early stage, late stage and mid-term viability reviews will be sought (reflecting London Plan Policy H5 Parts E and F).

33.3 The Local Plan proposes some measures to support delivery of additional affordable housing that are distinct from the London Plan approach. These have been adjusted from the Camden Local Plan 2017 and its predecessors through negotiation with the GLA to achieve general conformity with the London Plan. The distinctive measures are:

- use of affordable housing targets on a sliding scale for smaller developments which have capacity for 15 or fewer additional homes, as set out in Local Plan Policy H4 Part B.4 and paragraphs 7.114 to 7.117 – the sliding scale progresses from 2% to 30%, and has been designed to achieve the maximum reasonable contribution overall without deterring development or suppressing scheme size through a high starting target;
- seeking affordable housing contributions on the sliding scale from non-major developments as a departure from the NPPF (as explained in Local Plan paragraphs 7.108 - 7.109 and previously found to be sound in through public examination of the Camden Local Plan 2017); and
- providing flexibility for affordable housing contributions in the form of payments-in-lieu from non-major development (as explained in Local Plan paragraph 7.110).

33.4 In drafting Local Plan Policy H4, the Council have sought to ensure that the policy can be understood in its own right (without constant reference to the London Plan). The drafting has also taken place in the context of the early stages of a review of the London Plan, which might choose to amend the current viability thresholds of 35% and 50%, so the Council has sought to avoid entrenching those in the wording of Local Plan policy.

33.5 The Council has proposed two minor modifications to clarify the relationship between the Local Plan's approach and the London Plan (SD50 reference NMM03 and NMM04). Modifications to paragraph 7.124 confirm that the Council intends to adhere to the guideline mix of affordable housing types set out in Local Plan Policy H4 Part B.6. Modifications to paragraph 7.154 confirm that the consideration of financial viability is only expected at the application stage where proposals do not reach the relevant London Plan viability thresholds, or where smaller developments do not meet the sliding scale target set out in Local Plan Policy H4 Part B.4.

Paragraph 4.3 of the Statement of Common Ground with the GLA (SD19) makes reference to these modifications, and the GLA have confirmed that the Local Plan reflects the approach of the London Plan in respect of the affordable housing thresholds.

**34. With reference to Policy H4: Is a sliding scale for affordable housing below 10 dwellings justified and effective?**

- 34.1 Policy H4 parts B.1 and B.4 set out provisions for a sliding scale affordable housing target to apply to developments with capacity for **15** or fewer homes. Further explanation of the sliding scale appears in Local Plan paragraphs 7.114 to 7.117. The provisions of Policy H4 parts B.1 and B.4 represent a modest adjustment to the provisions in Policy H4(d) of the Camden Local Plan 2017, which was found to be sound at public examination. The adjustment terminates the sliding scale at a lower level, so that developments with capacity for 15 or fewer homes are anticipated to benefit from a sliding scale terminating at 30% (as now proposed), rather than developments with capacity for fewer than 25 additional homes benefitting from a sliding scale terminating at 50% (2017). The adjustment was negotiated with the GLA to dovetail with the London Plan's viability threshold approach, which applies a 35% threshold to most larger developments involving housing that come forward in Camden.
- 34.2 The sliding scale approach seeks contributions to affordable housing from developments that provide both:
- one or more additional homes; and
  - additional housing floorspace of 100 sqm GIA or more. Consequently, contributions to affordable housing will be sought in Camden from non-major developments (those involving fewer than 10 homes and creating a floorspace of less than 1,000 sqm).
- As indicated in Local Plan paragraph 7.135, we intend to accept payments-in-lieu of affordable housing from development proposals with capacity for fewer than 10 additional homes (i.e. floorspace below 1,000 sqm GIA when rounded to the nearest 100 sqm).
- 34.3 Seeking contributions to affordable housing from residential developments other than major developments is a departure from paragraph 65 of the NPPF. The NPPF restriction on such contributions originated in a Written Ministerial Statement from 2014 (HCWS50). As indicated in Local Plan paragraph 7.108, in the light of the scale of affordable housing need in the borough, through examination of the Camden Local Plan 2017 the Council was able to make a successful case for local departure from the national approach. A similar statement was included in paragraph 3.98 of the Camden Local Plan 2017. The Local Plan's approach to seeking affordable housing from non-major developments is essentially unchanged from the Camden Local Plan 2017, which was subject to scrutiny at public examination and found to be sound.

- 34.4 There are three main elements justifying the Council's approach to seeking affordable housing contributions to non-major developments, and applying a sliding scale affordable housing target to development proposals with capacity for 15 or fewer homes. The details are set out in the following paragraphs under three headings as follows:
- the scale of the current need for affordable housing;
  - past under-delivery of affordable housing compared with past needs assessments; and
  - the impact of abrupt thresholds above which a much more challenging requirement for affordable housing applies.

### **The scale of the current need for affordable housing**

- 34.5 Local Plan paragraph 7.105 summarises the current need for affordable housing, indicating that as much as 60% of anticipated housing supply is required to meet the need for low-cost rented housing alone. More detail is provided in Figure 40 of Camden Local Housing Needs Assessment 2025 (EB10) and set out in paragraph 7.7 of the response to question 7 above. This indicates that the assessment in Figure 40 is constrained to the anticipated housing supply of 11,550 additional homes over the Plan period. After subtracting the anticipated growth in student housing and care home places, this leaves a supply of 10,181 self-contained dwellings, of which 6,286 (61.7%) would be needed for low-cost rent, 2,003 (19.7%) would be needed by others unable to afford market housing (potentially intermediate products), and 1,891 (18.6%) would remain to meet market housing needs.
- 34.6 Planning practice guidance (ID: 67-001-20190722) recognises that the housing needs of particular groups may exceed or be proportionally high in relation to overall housing need, and indicates that this occurs because the needs of particular groups are considered in relation to the whole population rather than household growth. Clearly, the extent of affordable housing need identified in the Needs Assessment could not be met by the remaining supply of 1,891 market homes indicated. Nevertheless, the extent of the affordable housing need demands that the Council should seek to maximise affordable housing delivery from every potential source.

### **Past under-delivery of affordable housing compared with past needs assessments**

- 34.7 Paragraph 7.111 of the draft Local Plan sets out affordable housing needs as assessed for the Camden Local Plan 2017, and compares them with delivery over the first five years of that plan's anticipated period. The Camden Strategic Housing Market Assessment 2016 (SHMA) found a identified a need for 10,200 affordable homes from 2016 – 2031, being 61% of the overall housing requirement for the period. The Camden Local Plan 2017 set a target for delivery of 5,300 additional affordable homes from 2016-31, based on the identified need, the maximum number of affordable homes likely to be viable and deliverable, and the factors determining likely delivery (the relationship between development costs, the value of market and affordable homes, the funding available from the Mayor's Affordable Homes

Programme, the income households have to spend on housing, past levels of delivery, and the anticipated housing output of the Council's Community Investment Programme)

34.8 Over the first five years of that Plan period (2016-2021), 923 additional affordable homes were delivered in Camden, which was just 27% of the five-year need indicated by the SHMA (one third of 10,200, equal to 3,400 homes), and 52% of the five-year target set out in the Local Plan 2017 (one third of 5,300, equal to 1,767 homes). The extent of past under-delivery again demands that the Council should seek to maximise affordable housing delivery from every potential source.

**The impact of abrupt thresholds above which a much more challenging requirement for affordable housing applies**

34.9 The Council has steadily refined its affordable housing policy through successive development plans over the last 20 years, seeking to increase the delivery of affordable housing, and reflect the impact of past policy on developments of different sizes. To summarise the refinements:

- the 2006 Camden Unitary Development Plan set a threshold of 15 homes/ 1,500 sqm at which the application of the 50% affordable housing target commenced, and had no sliding scale;
- the 2010 Camden Local Development Framework set a threshold of 10 homes/ 1,000 sqm at which the application of affordable housing targets commenced, and had a sliding scale for schemes from 10 homes/ 1,000 sqm to 50 homes/ 5,000 sqm; and
- the 2017 Camden Local Plan introduced small site affordable housing contributions for schemes with at least 1 added home and 100 sqm or more added floorspace, a steeper sliding scale terminating at 25 homes/ 2,500 sqm, and a threshold of 10 homes/ 1,000 sqm for an expectation that affordable homes would be delivered on site (with payments-in-lieu for smaller schemes).

34.10 A review of housing schemes completed from 2005-2015 by size is instructive in terms of understanding the impact of the thresholds adopted by successive housing policies. We can provide details on schemes completed from 2015-2025 by size if the Inspector would find this helpful.

**Schemes completed by size – 1 April 2005 to 31 March 2015**

Scheme size	Number of schemes	Percentage of all schemes	Total units	Percentage of all units
1	564	48.5%	564	9.6%
2	200	17.2%	400	6.8%
3	91	7.8%	273	4.6%
4	72	6.2%	288	4.9%
5	27	2.3%	135	2.3%

Scheme size	Number of schemes	Percentage of all schemes	Total units	Percentage of all units
6	35	3.0%	210	3.6%
7	19	1.6%	133	2.3%
8	23	2.0%	184	3.1%
<b>9*</b>	<b>25</b>	<b>2.1%</b>	<b>225</b>	<b>3.8%</b>
Total 1 to 9	1,056	90.8%	2,412	41.0%
10	10	0.9%	1.7%	1.7%
11	9	0.8%	1.7%	1.7%
12	8	0.7%	1.6%	1.6%
13	7	0.6%	1.5%	1.5%
<b>14*</b>	<b>17</b>	<b>1.5%</b>	<b>4.0%</b>	<b>4.0%</b>
15	4	0.3%	1.0%	1.0%
Total 10 to 15	55	4.7%	684	11.6%
15 to 30	17	1.5%	352	6.0%
31+ units	35	3.0%	2,431	41.4%
<b>Grand total</b>	<b>1,163</b>	<b>100.0%</b>	<b>5,879</b>	<b>100.0%</b>

\* red font indicates the scheme size immediately below the former 2010 affordable housing threshold of 10 homes and the former 2006 affordable housing threshold of 15 homes

- 34.11 The table above illustrates that the former thresholds of 15 homes (2006) and then 10 homes (2010) for the application of the affordable housing target suppressed the delivery of housing from schemes that could deliver 10-14 homes, with developers initially favouring 14 home schemes and then favouring 9 home schemes. The Council considers that this evidence provides compelling evidence to justify the sliding scale affordable housing target.
- 34.12 The table also illustrates the importance of smaller schemes (those providing 15 homes or fewer) to the overall supply of additional homes. Schemes providing 1-9 homes accounted for 90.8% of all schemes, and 41% of all homes completed. Schemes providing 10-15 homes accounted for a further 4.7% of all schemes, and a further 11.6% of all homes completed (owing to their larger size). The Council considers that this evidence provides compelling evidence to justify departure from the NPPF expectation that affordable housing should only be sought from major developments, and further justification for the sliding scale affordable housing target.
- 34.13 In support of the departure from the NPPF expectation that affordable housing should only be sought from major developments, the Council also notes that footnote 50 to London Plan 2021 indicates that "All major development of 10 or more

units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites", although London Plan Policy H2 itself makes no comment on affordable housing.

### **Effectiveness**

- 34.14 The Council considers that the best evidence available of the effectiveness of seeking affordable housing contributions from smaller schemes is the contributions delivered from smaller schemes since the adoption of the Camden Local Plan 2017. As indicated in response to question 40 below, the Council can provide details on the variety of small development proposals determined from 2017 to 2025, and the extent to which payments-in-lieu have been made in accordance with the formula in place at the time or on the basis of a development-specific viability appraisal if the Inspector would find this helpful. Based on initial assessment, the Council calculates that payments totalling over £7 million have been made to the Council's Affordable Housing Fund, which is used to support the delivery of affordable housing on alternative sites (such as estate regeneration schemes brought forward as part of the Council's Community Investment Programme).
- 34.15 Furthermore, the Council can also provide information on schemes completed from 2015-2025 by size if the Inspector would find this helpful. Here, the Council is aware of two relatively recent permissions for developments involving the delivery of between 10 and 15 additional homes which include a commitment to delivering affordable housing. These are:
- Site adjacent to 1 St Woods Park, recently completed (2018/4763/P, 9 additional market homes over 1,275 sqm GIA, 2 affordable homes delivered off-site); and
  - Site adjacent to Hurdwick House, Harrington Square, under construction (2023/3824/P, 11 additional homes including 1 on-site affordable home).
- 34.16 The Council does not consider that seeking modest financial contributions from non-major housing developments will harm overall housing delivery from such schemes or by small-scale builders, and does not consider that applying the sliding scale affordable housing target to smaller developments will harm overall affordable housing delivery. The Council *does* consider that the draft Local Plan approach (which involves a modest adjustment to the approach of the Camden Local Plan 2017) will lead to the optimal quantum of housing on small sites, and avoid encouraging developers to suppress the quantum of development so that it falls below 1,000 sqm/ 10 homes.
- 34.17 Taking all these factors into account, the Council considers that the sliding scale target for affordable housing in smaller developments (including non-major developments) is fully justified and effective.

**35. What effect is the policy expected to have on affordable housing provision in the Borough?**

- 35.1 Draft Local Plan Policy H4 aims to maximise overall housing delivery and optimise the contributions made to affordable housing (subject to the delivery of affordable homes of the requisite size and tenure). Its provisions refine the Council's policy on affordable housing which has evolved over the past twenty years.
- 35.2 The draft Local Plan policy maintains many features of Camden Local Plan 2017 that assist housing and affordable housing delivery, with adjustments to some provisions as considered necessary. Features that are maintained include:
- excluding developments that do not involve both one-or-more additional homes and 100 sqm GIA or more additional floorspace – as indicated in response to question 34, completions from 2015-2025 involving a single home involved 48.5% of housing developments and 9.6% of additional homes, which the Council would not wish to suppress;
  - seeking affordable housing from non-major development schemes, sought in accordance with a sliding scale, and generally taking the form of a payment-in-lieu – as indicated in response to questions 34 and 40, the Council calculates that payments totalling over £7 million have been made from this source to the Council's Affordable Housing Fund to support the delivery of affordable housing;
  - considering targets on the sliding scale on the basis of a development's *capacity* for additional homes based on floorspace, rather than on the number of additional homes – this provides for the mix of dwelling sizes in a development to be adjusted to reflect the market without affecting the affordable housing contribution, and ensures that homes with a large floorspace and high value make a proportionate affordable housing contribution; and
  - taking a criteria-based approach, which provides flexibility for the policy to be satisfied in a variety of ways depending on the constraints affecting the development (such as the particular type of housing proposed, constraints on providing a mix of tenures, and the impact of the mix of housing types sought on the quantum of development).
- 35.3 Through discussion with the GLA (both before and after Regulation 19 consultation on the draft Local Plan), the Council has adjusted elements of Policy H4 to ensure general conformity with the London Plan 2021, and maximise the delivery of housing and affordable housing (in accordance with the objectives of both the Council and the Mayor). Features that have been adjusted include:
- adding references to the London Plan viability thresholds, as indicated in response to questions 7, 9 and 31;
  - clarifying the relationship with the London Plan in relation to viability thresholds and the submission of viability appraisals at the application stage, as noted in response to question 9 (paragraph 9.5);
  - maintaining the sliding scale affordable housing target for smaller developments, but terminating this for schemes with capacity for 16 or more additional homes to conform with the London Plan approach to larger developments – as detailed in response to question 34;

- maintaining the approach to considering the proportion of affordable housing sought on the basis of capacity for *net additions* to the number of homes rather than the use of the gross number of homes proposed, but terminating this for schemes with capacity for 16 or more additional homes to conform with the London Plan approach to larger developments – the use of net additional homes enables schemes to come forward more readily where there are existing market homes on the site; and
- raising the threshold at which the Council may seek affordable housing with care and support *from* developments with capacity for 25 additional homes or more *to* developments providing 100 homes or more – as detailed in the response to question 37.

35.4 The adjustments to Local Plan Policy H4 also clarify the relationship with London Plan regarding the use of floorspace and habitable rooms to assess the proportion of affordable housing. The clarified position appears in Policy H4 part B.7 and paragraphs 7.119 and paragraphs 7.125 to 7.131. Essentially, these indicate that both measures will be used, but that the Council will give primacy to floorspace except where developments must be referred to the Mayor under the provisions of the relevant legislation. Key elements of the rationale are:

- the largest need for social rented homes is for 3-bedroom homes, but there is also a substantial need for 2-bed and 4-bed homes;
- the 2021 Census showed that 19.7% of households in social rented housing were living in overcrowded homes;
- in view of overcrowding, the Council seeks to ensure that any second bedrooms in low-cost rented housing (including social rented housing) can accommodate 2 occupiers (e.g. 2-bedroom 4-person homes and 3-bedroom 5-person homes);
- the habitable rooms measure thwarts this objective, as developers will seek to minimise the cost of affordable homes and maximise viability by providing the smallest possible habitable rooms.

35.5 The response to question 34 above indicates that seeking affordable housing contributions from non-major developments and operating the sliding scale has been successful in Camden in the past. It also shows that the past use of abrupt thresholds above which a much more challenging requirement for affordable housing applies has suppressed the size of development to keep them below the threshold, thus reducing overall housing delivery.

35.6 The Council is concerned that if affordable housing contributions from developments with capacity for 1-9 additional homes could no longer be sought, this would suppress the scale of schemes that could potentially provide 10 additional homes or more (reducing both overall housing delivery and contributions to affordable housing). The Council does not consider that maintaining the sliding scale target of 20% to 30% for developments with capacity for 10-15 additional homes would be sufficient to overcome this impact.

35.7 To conclude, the Council considers that Policy H4 of the draft Local Plan:

- represents the culmination of a series of refinements over a 20-year period designed to assist the delivery of housing and contributions to affordable housing;
- has been negotiated with the GLA (both before and after Regulation 19 consultation on the draft Local Plan) to ensure general conformity with the London Plan 2021 and maximise the delivery of housing and affordable housing;
- is in general conformity with the London Plan subject to minor modifications included in the Schedule of Proposed Minor Modifications to the Camden Local Plan Proposed Submission Draft (SD50), as confirmed by the Statement of Common Ground between the Council and the GLA (SD19);
- retains most of the features of Policy H4 in the Camden Local Plan 2017, which was found to be sound at public examination;
- will serve to maximise overall housing delivery and optimise the contributions made to affordable housing (subject to the delivery of affordable homes of the requisite size and tenure).

### **36. Is reference to flexibility in tenure split sound?**

36.1 Part B.6. of Policy H4 states that the Council will apply a guideline mix of affordable housing types to seek 60% low-cost rented housing and 40% intermediate housing. Paragraph 7.124 in the supporting text to the policy states that the guideline mix will be applied flexibly taking into account the criteria in Policy H4, and that in certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing.

36.2 The reference to flexibility was raised by the Mayor / GLA in their response to the Proposed Submission Draft Local Plan. The Council considers the approach in the Draft Plan is consistent with the London Plan. A measure of flexibility in the tenure split is inevitable, since the proportion of housing in each tenure will be assessed on the basis of floor area and / or habitable rooms, but a development will be designed to provide a whole number of appropriately sized homes in each tenure.

36.3 Policy H6 of the London Plan gives discretion to boroughs to choose between low-cost rent and intermediate tenures for 40% of the affordable housing (in Part A.3), and is only prescriptive that there should be a minimum of 30% low cost rented housing (Part A.1) and a minimum of 30% intermediate housing (Part A.2).

36.4 The London Plan also refers to flexibility over the tenure split in paragraphs 4.5.10 (for schemes with a high proportion of affordable housing), paragraph 4.6.11 (for schemes delivering more than 35% affordable housing) and paragraph 4.6.12 (for schemes assessed under the Viability Tested Route).

36.5 Notwithstanding this, as set out in the Statement of Common Ground between the Council and the GLA (SD19), in response to the GLA's comments the Council has proposed a modification to paragraph 7.124 -

"We will expect applications to adhere as closely as possible to the guideline mix set out in Policy H4 part B6. However, the  
 The guideline mix will be applied flexibly taking into account the need to achieve a rational division of the development in

terms of homes of appropriate sizes and tenures, and the criteria in Policy H4. ~~and in~~ In certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing.”

- 36.6 The proposed wording was agreed by the GLA, who considered that the proposed modification provides sufficient clarity about expectations regarding tenure mix (see the Table of GLA representations and LB Camden response in the Statement of Common Ground).
- 37. With reference to Policy H4: What evidence is there to support the requirement in Policy H4B(8) that may require developments of 100+ homes to provide affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision?**
- 37.1 The provisions of Policy H4 part B.8 represent a modest adjustment to the provisions in Policy H4(f) of the Camden Local Plan 2017, which was found to be sound at public examination. The adjustment raises the threshold at which the Council may seek affordable housing for older people or other people with care or support requirements from developments with capacity for 25 or more additional homes (2017) to those providing 100 homes or more (now proposed).
- 37.2 The parts of the draft Local Plan that assess the need for housing for those people with care or support requirements are listed in response to question 11 above. The needs are addressed by Policy H8, where part D sets out provisions matching those of Policy H4 part B.8. The needs are assessed in supporting paragraphs 7.239 to 7.253, including the needs related to older people, mental health, learning disabilities, autism, children and young people, and homeless adults.
- 37.3 Local Plan paragraphs 7.239 to 7.253 also include the Council's assessment of the range of facilities it will seek to provide affordable housing for people with care or support requirements. The largest of these are identified in Local Plan paragraph 7.241 as either:
- a single carefully managed for 45 flats; or
  - one facility of 30-40 flats provided in the first 10 years of the Plan period, with a second towards the end of the Plan period.
- 37.4 In consultation with the viability consultant (BNP PRE), the Council has devised the raised threshold in draft Policy H4 part B.8 (developments providing 100 homes or more) on the basis of the scale of the facilities indicated in paragraph 7.241 and the scale of market-led housing development that would be able to accommodate it. The raised threshold is consistent with the viability evidence summarised in the paragraphs 37.5 to 37.8 below.
- 37.5 The Local Plan Review Viability Study (EB01) did not directly consider the viability of seeking affordable housing for older people or other people with care or support

requirements. In consultation with BNP PRE (the authors of the viability study), the Council took the view that:

- such affordable housing will be subject to similar constraints on rents and values as other forms of affordable housing for low cost rent;
- care/ support services are funded directly by the Council as part of its social care function, so the provision of these services would have no bearing on the Registered Provider's operating costs;
- substituting affordable housing with care or supported housing would not have a significant impact on the financial viability of development as the amount a registered provider would pay the developer would be broadly the same as for general needs rented affordable housing; and
- providing supported housing would involve only a modest additional element of floor area that is not income-generating (communal space and support facilities).

37.6 A number of responses to the regulation 19 consultation on the Local Plan raised the inclusion of affordable housing with care or support as a potential viability issue, notably the Greater London Authority (GLA). Consequently, the Council has commissioned a supplementary note assessing the viability of provision of affordable housing with care or support as an alternative to general needs affordable housing on larger development sites as envisaged by Local Plan Policy H4 part B.8 and Policy H8 part D. If the Inspector agrees this note will be added to the Examination Library.

37.7 The supplementary viability assessment revisits the four residential typologies already included in Local Plan Viability Study that involve more than 100 homes, being Resi 13 to Resi 16, and examines the impact of introducing affordable housing with care or support in place of some of the affordable housing that would otherwise be sought. The two forms of housing with care/ support that have been examined have been selected on the basis that:

- they are at the top and the bottom (respectively) of the scale of the residential care/ support facilities that the Council anticipates commissioning; and
- facilities of these types have recently been delivered in the borough, and provide sources of information about the scale and cost of requirements and the rental incomes generated by the homes.

37.8 The viability testing concludes that the viability of the four large residential typologies does not change substantially as a consequence of the substitution of affordable housing with care or support in place of a proportion of affordable housing provided in accordance with the requirements more usually anticipated by Policy H4 part B.6 (60% low cost rented housing and 40% intermediate housing) and Policy H7 (which prioritises large homes for low cost rented housing and small homes for intermediate housing). The assessment notes that:

- the housing with care/ support would involve a modest additional element of floor area that is not income-generating (communal space and support facilities);
- all the homes provided with care/ support would be one-bedroom homes (in contrast with the anticipated mix usually sought, which includes three-bedroom homes);

- small affordable homes generate a higher rent and value per sqm than large affordable homes;
- consequently, the inclusion of space that is not income-generating in housing with care/ support is offset by the higher value per sqm of the small homes provided.

37.9 Taking these factors into account, the Council considers that the provisions of Local Plan Policy H4 part B.8 are based on robust evidence.

**38. Have the viability impacts of the policy been tested? If so, what were the findings? Does the viability evidence support Camden's affordable housing targets and tenure mix?**

38.1 Viability evidence to support the Local Plan is set out in the Camden Local Plan Review Viability Study (EB01). The Viability Study and its findings in relation to the Local Plan's affordable housing target are set out in response to questions 10 and 31 above. The Local Plan's tenure mix and conformity with tenure requirements of the London Plan 2021 (Policy H6) are addressed by the response to questions 7, 8, and 12 above. The Council considers that the Viability Study provides ample evidence to support the affordable housing targets and tenure mix set out in Policy H4 of the Local Plan.

**Viability study findings in relation to affordable housing targets**

38.2 The most pertinent aspects of the Viability Study's findings in relation to affordable housing targets are set out in response to question 31 above. In sum:

- the study does not test a specific affordable housing target, but appraises the viability of a range of affordable housing delivery from 0% to 50%;
- the appraisals indicate that there are significant variations in the percentage of affordable housing that can viably be provided depending on the typology being appraised, the location being considered, and the arising private sales values, scheme composition and benchmark land value;
- consequently the results do not indicate any particular percentage of affordable housing that most developments would be able to deliver;
- setting a lower target that could be met more consistently would deliver far less affordable housing than is needed and fail to deliver a higher percentage from those developments that could viably do so; and
- there is no difference between the viability of larger schemes and those delivering fewer than 10 homes, so the approach of applying a sliding scale target and accepting payments-in-lieu in relation to smaller developments is reasonable and pragmatic.

38.3 To provide further detail, key conclusions of the Viability Study are set out below (with emphasis added):

- Paragraph 7.6 states (in part): "**We have appraised residential schemes with a range of affordable housing from 0% to 50% to test the ability of development typologies to meet the requirements of draft Policy H4...** our

appraisals indicate that there are significant variations in the percentages of affordable housing that can be provided depending on private sales values, scheme composition and benchmark land value. The results therefore do not point to any particular level of affordable housing that most schemes can viably deliver. The Council's draft Policy H4 maintains the currently adopted strategic target of 50% (applied on a sliding scale) and takes into consideration the economics and financial viability of site-specific circumstances. Given that this effectively reflects the Council's current practice (albeit with a shortened sliding scale) and also the approach in the 2021 London Plan, **we consider the draft Policy to be reasonable. It allows for sufficient flexibility, both in terms of tenure mix and overall quantum, to enable schemes to come forward with the maximum viable package of affordable housing. Setting a lower proportion of affordable housing would likely result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so.**"

- Paragraph 7.3 states: "Although the NPPF sets an ambition for plan policies to be set in the plan with little use of viability assessments when planning applications are brought forward, this is only a realistic expectation in rural district authorities with homogenous greenfield development. In common with other London boroughs, Camden has a complex range of development scenarios, with development sites that are in various existing uses; significant variation in the types of developments that come forward; and a high degree of variability in residential sales values. In such circumstances, **setting a policy that all schemes can viably deliver would require the level of affordable housing to be set at such a low level, it would be relatively meaningless in terms of meeting affordable housing need. It would be a policy that is determined by the lowest common denominator and schemes that could have viably delivered a higher percentage would no longer be required to do so.**"
- Paragraph 7.4 states: "We therefore support the Council's proposed approach, which maintains its ambitious target for affordable housing, which some schemes can meet over the plan period, but recognises that this will not always be achieved due to site-specific viability issues. This approach is essentially consistent with the existing policy approach both in the adopted Camden Local Plan 2017, and also in the London Plan, which adopts a threshold approach to affordable housing, and has an explicit route for schemes that cannot provide the threshold level of affordable housing. **The threshold percentage itself is set at a lower level for most development (35%) than the London Plan's strategic target of 50%**"
- Paragraph 7.5 states: "In considering the outputs of the appraisals, it is important to recognise that some developments will be unviable regardless of the Council's requirements. In these cases, the value of the existing building or the base costs (excluding policy requirements) will be higher than a redevelopment opportunity over the medium term. However, this situation should not be taken as an indication of the viability (or otherwise) of the Council's policies and requirements. In these situations, there will be little pressure from owners to

redevelop for residential use and they might re-consider the situation when values change over time."

- Paragraph 7.6 states (in part): "our appraisals indicate that **there is no significant difference in the viability of schemes providing 9 or fewer units** than those of 10 units or more. We consider the Council's Policy approach of **seeking affordable housing on a sliding scale, applied subject to viability**, to be **reasonable**. As providing affordable housing on small sites gives rise to practical difficulties, the Council's **flexibility in seeking PIL of onsite affordable housing for such schemes is a pragmatic approach.**"

- 38.4 The Council notes that the strategic affordable housing of 50% would only be applied to individual developments in a limited range of circumstances. As set out in Local Plan paragraph 7.120, the London Plan 2021 sets a viability threshold of 50% for industrial land and most public sector land and a 35% viability threshold in other cases (details appear in London Plan 2021 Policy H5). These viability thresholds may be amended through future London Plans or London Plan guidance, and we will apply the latest thresholds to be formally approved. Considering the 2021 viability thresholds, the 35% threshold will apply to most larger developments involving housing that come forward in Camden.
- 38.5 Local Plan Policy H4 has been drafted at the early stages of a review of the London Plan, which could potentially amend the current viability thresholds of 35% and 50%. Following review of the London Plan, the 50% target may not apply to any developments in Camden.

#### **What happens when evidence in the Local Plan Viability Study is no longer up-to-date?**

- 38.6 The NPPF indicates in paragraph 72 that (emphasis added): "planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and **likely economic viability**". The definition of developable in the to the NPPF indicates that (emphasis added): "To be considered developable, sites should be in a suitable location for housing development **with a reasonable prospect that they will be available and could be viably developed at the point envisaged**".
- 38.7 In relation to planning obligations, NPPF paragraph 59 indicates that: "Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force".

- 38.8 Planning practice guidance ID: 10-010-20251216 indicates in part: "As the potential risk to developers is already accounted for in the assumptions for developer return in viability assessment, realisation of risk does not in itself necessitate further viability assessment or trigger a review mechanism. Review mechanisms are not a tool to protect a return to the developer, but to strengthen local planning authorities' ability to seek compliance with relevant policies over the lifetime of the project. They should not be used to avoid policy compliance or reduce agreed contributions."
- 38.9 The Council notes that it is inevitable that there will be changes to costs and values between the collection of data used in viability testing of a local plan's policies and the regulation 19 consultation on that local plan. These will continue up to and during public examination of the plan. If a local plan is found to be sound at public examination and subsequently adopted, they will continue to change across the plan period. Over the period, there may be years where build cost increases outstrip growth in property values, and there may be years where growth in property values outstrip build cost increases. In relation to development proposals that come forward in Camden at a time when circumstances have changed since preparation of the Local Plan (and preparation of the viability appraisals upon which it was based), Policy H4 part E.7 provides for the Council to take account of viability evidence submitted in association with planning application. This viability evidence would need to be considered in the light of all relevant provisions of the London Plan, the NPPF, and planning practice guidance.

#### **Affordable housing tenure mix in Local Plan Policy H4 and the Viability Study**

- 38.10 Local Plan Policy H4 part B.6 sets out a guideline mix of affordable housing types, being 60% low-cost rented housing and 40% intermediate housing. As explained in response to question 7 above, in the context of Policy H6 of the London Plan 2021 and the requirement to be in general conformity with the London Plan, the Council has relatively limited choice over the tenure mix included in the London Plan.
- 38.11 The Local Plan's guideline affordable housing tenure mix is consistent with the framework set by London Plan Policy H6 part A, which stipulates a minimum of 30% low-cost rented homes and a minimum of 30% intermediate products, with the remaining 40 per cent to be directed to either of these two types by the borough on the basis of identified need. Camden Council has split this 40% by adding 30% to low cost rent and 10% to intermediate housing. The 60%-40% split between affordable housing types was also included in the Camden Local Plan 2017, and found to be sound at public examination.
- 38.12 The response to question 7 provides further explanation of the Local Plan tenure mix. To summarise:
- the breakdown of the borough's housing needs is provided in Figure 40 of Camden Local Housing Needs Assessment 2025 (EB10);

- Figure 40 is constrained to the anticipated housing supply over the Plan period (11,550 additional homes), from which the anticipated supply of student housing and care home beds has been subtracted;
- this leaves a supply of 10,181 self-contained dwellings, of which 6,286 (61.7%) would be needed for low-cost rent, and 2,003 (19.7%) would be needed by others unable to afford market housing (potentially intermediate housing, assuming that the type of intermediate housing required by these households can be provided in the borough).

38.13 The response to question 7 goes on to indicate that the Local Plan Policy H4 guideline that 40% of affordable homes should be provided as intermediate housing is a little higher than the Local Housing Needs Assessment would suggest, but is also informed by London Plan Policy H6 part A, and the greater viability of some intermediate products relative to low-cost rented homes.

38.14 The 60%-40% split between affordable housing types in draft Policy H4 was also included in the Camden Local Plan 2017, and found to be sound at public examination. The Council considers that a higher percentage of intermediate housing (and a lower percentage of low-cost rented housing) would be inconsistent with the Needs Assessment (EB10). On the other hand, a lower percentage of intermediate housing (and a higher percentage of low-cost rented housing) would reduce the viability of the Local Plan's housing targets and reduce the overall delivery of affordable housing.

38.15 In the context of this position, the Viability Study (EB01) tested the guideline tenure mix set out in the Local Plan, and did not consider alternative options. This is confirmed by EB01 paragraph 4.11:

"We have accordingly tested the larger typologies' ability to deliver a range of 0% to 50% onsite affordable housing, at a tenure split of 60% low-cost rent and 40% intermediate housing".

38.16 Table 4.15.1 in EB01 provides the intermediate rents adopted for the viability testing. These are consistent with the guidance on intermediate housing costs and affordability provided by Camden Planning Guidance: Housing 2021 (LD30) in paragraphs 3.40 to 3.44.

38.17 Table 4.18.1 in EB01 provides the capital values per square foot adopted for the viability testing (arising from the rents in Table 4.15.1), and confirms that they are higher for the particular intermediate tenure tested (Camden Intermediate Rent) than for units of the same size provided for London Affordable Rent (the particular form of low-cost rented housing tested). Table 4.18.1 also indicates that larger homes (with 3-bedrooms or more) have a lower capital value per square foot than smaller homes.

38.18 Table 4.3.1 in EB01 provides the unit mix (dwelling sizes) adopted for the viability testing, and confirms that the mix of intermediate housing does not include any homes with more than 2 bedrooms, which would reduce viability. The unit mix in

table 4.3.1 is consistent with the guidance on the mix of intermediate rented housing provided by Camden Planning Guidance: Housing 2021 (LD30) in Figure 2 on page 27.

38.19 Taking all these factors into account, the Council considers that the Viability Study appropriately tests and supports the affordable housing tenure mix set out in Local Plan Policy H4 part B.6.

**39. With reference to Policy H4: Should the Local Plan explicitly reference Shared Ownership as acceptable where it meets London Plan affordability criteria?**

39.1 Local Plan paragraph 7.123 does not seek to prohibit shared ownership, but it does strongly encourage the provision of homes for intermediate rent. The Council notes that paragraph 3.104 of the Camden Local Plan 2017 (LD01) expressed the Council's position in essentially the same form, and the Local Plan 2017 was found to be sound at public examination.

39.2 The Mayor's Affordable Housing and Viability SPG 2017 states that "Generally shared ownership is not appropriate where unrestricted market values of a home exceed £600,000". HPI data from the Land Registry downloaded in March 2026 indicates that throughout the year 2024/25, average Camden prices across all property types exceeded £800,000, and average Camden prices for flats and maisonettes (the cheapest category) exceeded £670,000. Across all property types, average prices for new-build properties exceeded average prices for existing properties by 2% to 8%.

39.3 If the market values for a site are at a level low enough for shared-ownership to be affordable within the London Plan gross annual household income cap of £90,000, the Local Plan would not prevent favourable consideration of shared-ownership, subject to satisfying the provision in paragraph 4.6.9 of the London Plan 2021 that "Boroughs should seek to ensure that intermediate provision provides for households with a range of incomes below the upper limit".

39.4 The Council is concerned that providing express support for shared ownership would have the following consequences:

- the majority of new intermediate housing offered in Camden would be provided as shared ownership housing, and the income required to access this would far exceed the median income of Camden residents; and
- shared ownership housing could be approved on the basis that it met the affordability criteria at the time of the application, but then be unable to satisfy the criteria at the time of completion due to increases in sales values and interest rates (for the equity sold), increases in rent (for the unsold equity), and increases in service charges (typically related to the entire property).

39.5 Based on data from the Office for National Statistics (ONS), median gross annual earnings of full-time workers living in Camden were £44,529 in 2023/24 (House price to residence-based earnings ratio). For the same period, median gross annual

earnings of full-time workers based at a workplace in the borough were £47,882 (House price to workplace-based earnings ratio). Figures for 2024/25 are not yet available from this source, but are due to be released in March 2026.

39.6 The Camden Local Needs Assessment 2025 (EB10) provides the weekly cost of different types of housing in Figure 23 on page 31. This includes the weekly cost of shared ownership where the purchaser has acquired 25% of the equity (typically the minimum offered). While this does not provide evidence of the deposit required or the income required for a mortgage, it does provide for a calculation of the income needed for the overall housing costs to be regarded as affordable on the basis of the London Plan's affordability criteria.

39.7 The affordability criteria of the London Plan and associated guidance indicate that housing costs (including rent and service charges) take up no more than 40% of net household income (with net income assumed to be 70% of gross income) (RD01, paragraph 4.69, London Plan Annual Monitoring Report 16, paragraph 3.89). In effect, housing costs should not exceed 28% of gross household income, and the income at which any given property is affordable should be no less than 3.57 times the housing cost (3.57 is 100 divided by 28). Using the housing cost data from the Needs Assessment (EB10 Figure 23), the table below shows the incomes at which shared ownership will be affordable, and compares this with the 2023/24 median Camden income from ONS.

<b>Dwelling size</b>	<b>1-bedroom</b>	<b>2-bedroom</b>	<b>3-bedroom</b>	<b>4-bedroom</b>
<b>Weekly housing cost (shared ownership, 25% equity)</b>	£426.18	£485.34	£555.04	£653.05
<b>Annual housing cost (shared ownership, 25% equity)</b>	£22,161.36	£25,237.68	£28,862.08	£33,958.60
<b>Minimum gross annual income required</b>	£79,116.06	£90,098.52	£103,037.63	£121,232.20
<b>Multiple of Camden median income (residence-based)</b>	x 1.78	x 2.02	x 2.31	x 2.72
<b>Multiple of Camden median income (workplace-based)</b>	x 1.65	x 1.88	x 2.15	x 2.53

39.8 Based on the London Plan affordability criteria, the table above demonstrates that a single median income worker living or working in Camden would not be able to

afford 25% equity in a shared ownership property, regardless of dwelling size. Two median income workers living or working in Camden would be able jointly to afford a one-bedroom shared ownership property on this basis. Two median-income workers with a workplace in Camden would also be able jointly to afford a two-bedroom shared ownership property, although twice the Camden residence-based median income would be insufficient for a two-bedroom shared ownership property. Larger shared-ownership properties would not be affordable to two median-income Camden residents or workers purchasing jointly.

- 39.9 Whilst this demonstrates that shared ownership would provide few opportunities for median income Camden residents or workers to access affordable housing in Camden, there are many local residents and workers on incomes above the median who are unable to afford suitable market housing in the borough, and could potentially access shared ownership in Camden. However, the Council notes that the London Plan sets a maximum gross annual household income cap of £90,000 for intermediate ownership products such as shared ownership (RD01 paragraph 4.68). On the basis of the table above, operating this income cap means that only one-bedroom shared ownership properties in Camden would qualify as affordable housing. The LHNA data relating to housing costs together with the London Plan household income cap therefore support the Council's position that shared ownership will rarely be appropriate in Camden.
- 39.10 The affordability of shared ownership can be improved by offering a smaller share than 25% for sale and reducing rent on the unsold equity below the typical 2.5% of value per year. For example, where the capital value of a property is very high, it may be possible to meet affordability criteria by offering a 10% share for sale and charging an annual rent of 1% of the value of the unsold equity. However, this is unlikely to be a viable scenario for the housing provider, as the proceeds of the equity sold added to the capitalised rent for the remainder would fall far short of the capital value of the property. Consequently, the price the housing provider would be prepared to offer the developer would be reduced, and the viability of the development would be reduced.
- 39.11 Finally, in relation to the concern that homes for shared ownership may be no longer be able to satisfy the affordability criteria by the time of completion, the Council notes that Camden house prices have been fairly stable since 2016, but rapid rises were experienced in the period from 2011 to 2016, and may well be experienced again over some years during the Plan period. HPI data from the Land Registry downloaded in March 2026 indicates that from April 2011 to March 2016, monthly average Camden prices across all property types rose from £551,082 to £846,504, an increase of 53.6%.
- 39.12 Taking all these factors into account (particularly paragraph 39.4 above), the Council does not consider that the Local Plan should explicitly state that shared ownership is an acceptable tenure in Camden where it meets London Plan affordability criteria.

**40. With reference to Policy H4: Is the approach to payment in lieu of provision clear and effective?**

- 40.1 The Council provides for payments-in-lieu of affordable housing through Local Plan Policy H4 parts B.9 and B.10, with supporting paragraphs 7.134 to 7.135 and 7.141 to 7.142. For smaller developments, these are augmented by explanation of how the sliding scale operates and how to calculate the affordable housing floorspace target. This explanation can be found in Policy H4 parts B.2, B.3 and B.4, with supporting paragraphs 7.115 to 7.117.
- 40.2 The Council has been securing payments-in-lieu on a formula basis for many years, applying a standard payment per sqm (GIA) of the affordable housing sought by the policy but omitted from the development. This figure is updated periodically, most recently through the Camden Planning Guidance: Housing 2021 (LD30), and is included in Local Plan paragraph 7.142. A single figure of £5,000 per sqm (GIA) is used for all types of affordable housing including low cost rented housing and intermediate housing.
- 40.3 The principle behind the Council's calculation of the standard payment is set out in Local Plan paragraph 7.41 as follows:  
"Payments should be based on the difference between: the value of the development as proposed (with no affordable housing, or with less affordable housing than is required by Policy H4); and the value of a similar hypothetical development including the full requirement for affordable housing. This basis ensures that the payment is equivalent to the gain to the developer from failing to meet the full self-contained housing requirement."
- 40.4 This principle ensures that any negotiations between the applicant and the Council on whether affordable housing should be provided directly or via a payment-in-lieu will take place on a value-neutral basis: there is no direct financial gain or loss to the developer whichever option is selected.
- 40.5 The Council commissioned evidence from BNP PRE to inform the £5,000 per sqm (GIA) adopted by Camden Planning Guidance, which is published on the Council's website as the [Camden Review of Payment-in-Lieu Rates for the Camden Local Plan 2017 and Camden Planning Guidance](#) (LD95). Local Plan paragraph 7.142 notes that the payment rates have been based on viability testing of a variety of development typologies. The Council acknowledges that the gain in the value of each development from the omission of affordable housing will vary over time and depend on the specific location and characteristics of the proposal. Consequently, paragraph 7.142 provides for applicants to submit their own financial viability appraisal to indicate an appropriate level of payment calculated on the basis of the principle set out above.
- 40.6 The Council can also provide information on the variety of small development proposals determined from 2017 to 2025, and the extent to which payments-in-lieu

have been made in accordance with the formula in place at the time or on the basis of a development-specific viability appraisal if the Inspector would find this helpful. Based on initial assessment, the Council calculates that payments totalling over £7 million have been made to the Council's Affordable Housing Fund, which is used to support the delivery of affordable housing on alternative sites (such as estate regeneration schemes brought forward as part of the Council's Community Investment Programme).

40.7 Taking all these factors into account, the Council considers that the Local Plan's approach to payments-in-lieu of affordable housing is clear and effective.

#### **41. Is there sufficient flexibility in the policy?**

41.1 It is considered that the policy approach to maximising contributions to affordable housing contains appropriate flexibility.

41.2 Draft Local Plan paragraph 7.33 identifies a number of areas of flexibility in the Council's policy approach that will enable us to tailor our objectives to the particular circumstances of each proposal. These include:

- varying the proportion of market and affordable housing;
- varying the split between low-cost rented housing (homes for Social Rent or London Affordable Rent) and intermediate affordable housing;
- positively considering different forms of intermediate affordable housing to take advantage of the funding and credit available; and
- reviewing the range of Section 106 planning obligations sought to maintain viability.

41.3 Paragraph 7.34 states that:

“In negotiating the range of housing types and sizes on individual sites, including the proportion and range of affordable housing, the Council will have regard to the characteristics and constraints of the site and the area, progress towards meeting Camden's overall housing target, the financial viability of the development, the contribution the development makes to the creation of mixed communities, and other Local Plan objectives.”

41.4 Policy H4 seeks affordable housing to be provided on site wherever this is practical (Part B.9). However, in circumstances where this is not practical, or off site provision would create a better contribution (in terms quantity and / or quality), it provides flexibility to allow for the provision of affordable housing off site in the same area or, exceptionally, a payment-in-lieu (Part B.10).

41.5 Part E of Policy E4 sets out the matters that the Council will take into account when considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate:

- whether there is any existing housing on site (with further information set out in paragraphs 7.147 - 7.148);

- any self-build or custom-build housing proposed (with further information set out in paragraphs 7.149 - 7.150);
- any housing proposed for people with care or support requirements (with further information set out in paragraph 7.151);
- the character and size of the development, and any constraints (with further information set out in paragraph 7.152);
- the impact on creation of mixed, inclusive and sustainable communities, and the mix of housing types (with further information set out in paragraphs 7.153);
- the economics and financial viability of the development (with further information set out in paragraphs 7.154 - 7.156); and
- whether an alternative approach could better meet the objectives of the policy and Local Plan (with further information set out in paragraph 7.157).

41.6 As set out in paragraph 7.154 and 7.155, in negotiating an affordable housing contribution, the Council will consider all aspects of financial viability, including the availability of public subsidy, particular costs associated with the development, and the distinctive viability characteristics of particular development sectors. Where financial viability constraints prevent a development from meeting the affordable housing target, and there is a prospect of viability improving prior to delivery, we will expect a viability review subject to the London Plan's viability threshold approach, and will seek an increased affordable housing contribution if viability improves over time.

41.7 Paragraph 7.157 makes clear that the Council will positively consider alternative approaches to delivering affordable housing as part of development. We will encourage proposals that can better maximise the supply of affordable housing while providing an appropriate mix of affordable housing types, for example by converting existing market housing into affordable housing. We will also consider how proposals deliver other plan objectives and their impact on the potential to deliver affordable housing, such as the impact of including affordable business space for small and medium-sized enterprises.

41.8 Similar to the approach in the adopted Local Plan 2017, the Council will continue to provide flexibility for payments-in-lieu of affordable housing from the smallest developments (those involving with capacity for fewer than 10 additional homes), as set in paragraph 7.135.

41.9 In addition, paragraph 7.124 confirms that the guideline mix of affordable housing types in Policy H4 will be applied flexibly taking into account the criteria in Policy H4, and that in certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing. Further detail on flexibility in relation to tenure, including the modification to paragraph 7.124 the Council has proposed in response to the GLA's comments, is set out in the answer to Question 36 above.

41.10 The approach in H4 is considered to be consistent with NPPF paragraph 64, which states that planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified.

## **Policy H5**

### **42. Overall, is Policy H5 effective in protecting and improving affordable housing?**

42.1 Policy H5 is considered to be effective in protecting and improving affordable housing. It seeks to protect affordable housing by:

- resisting development that would involve a net loss of any type of affordable housing floorspace (Part B)
- expecting the retention or replacement of all existing affordable housing in terms of floorspace and / or habitable rooms in estate regeneration schemes (Part D).

42.2 As set out in paragraph 7.163 of the supporting text to Policy H3 Protecting existing homes, Camden's existing stock of social rented housing is heavily skewed to 1 or 2-bedroom homes, and overcrowding in the existing stock creates a compelling need for an additional supply of large affordable homes with 3 or more bedrooms. To take account of the mismatch between supply and demand, the Council seeks to protect affordable housing floorspace rather than each individual affordable home, and supports proposals that adapt affordable homes to fit contemporary and future needs.

42.3 Policy H5 seeks to improve affordable housing by:

- aiming to increase the stock of affordable homes in the borough and maintain and improve the mix of affordable housing types and sizes (Part A).
- promoting the provision of more and better affordable homes through estate regeneration, the Council's Community Investment Programme and Better Homes Programme (to refurbish existing Council homes) (Part C).
- expecting the maximum viable addition to affordable housing in terms of floorspace and / or habitable rooms in estate regeneration schemes, having regard to the guideline mix of affordable housing types in Policy H4 Maximising the supply of affordable housing (Part D).

42.4 Policy H5 takes a similar approach to that set out in Policy H5 Protecting and improving affordable housing in the current Local Plan 2017 (LD01), which was found sound at public examination and is considered to be operating effectively.

42.5 Policy H5 of the draft Local Plan is considered to be consistent with the London Plan 2021 (RD01), in particular Policy H8 Loss of existing housing and estate redevelopment. The GLA have not raised any concerns in relation to the approach taken, as confirmed by the Statement of Common Ground between the Council and the GLA (SD19).

## **Policy H9**

**With reference to Policy H9:**

**43. Is the Council's approach to identifying a target of 200 additional places in student housing per year justified and effective?**

- 43.1 The Council considers the approach to identifying a target of 200 additional places in student housing per year is justified and effective.
- 43.2 Paragraph 63 of the NPPF (ND01) states that "housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include... students...". Furthermore, Policy H15 Purpose Built Student Accommodation of the London Plan 2021 (RD01) states that "Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed".
- 43.3 The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year. This requirement was established through the work of the Mayor's Academic Forum (see paragraph 4.15.2 of the London Plan and RD51 Student population projections and accommodation need for new London Plan 2017 (amended October 2018)).
- 43.4 To calculate the annual target for purpose-built student accommodation in Policy H9, the Council has used the London Plan annual requirement and data for full-time resident students from the 2021 Census (March 2021, students aged 18 and over) and the Higher Education Statistics Agency (academic year 2021/22, students registered at London's publicly funded Higher Education Institutions). We have calculated Camden's share by taking the mid-point of the number of Camden resident students from the two sources, and dividing it by the mid-point of the number of London resident students, and concluded that Camden's resident students were 5.7% of the London total. Applying this to the London Plan 2021 annual requirement generates the Camden target of 200 additional student bedspaces a year adopted by Policy H9 as the minimum borough requirement.
- 43.5 The GLA have not raised any concerns in relation to the approach taken in Policy H9. This is confirmed by the Statement of Common Ground between the Council and the GLA (SD19).
- 43.6 The London Plan is currently being reviewed, and this will result in a new strategic requirement for Purpose Built Student Accommodation (PBSA). Given this, we will aim to meet or exceed Camden's share of any new London Plan target, based on the updated proportion of London's resident students that are resident in the borough.

**44. How does the policy demonstrate general conformity with London Plan?**

- 44.1 Part A of Policy H15 Purpose Built Student Accommodation of the London Plan 2021 (RD01) states that:

"Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:

- 1) at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood
- 2) the use of the accommodation is secured for students
- 3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider
- 4) the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance
- 5) the accommodation provides adequate functional living space and layout".

44.2 Local Plan Policy H9 Purpose Built Student Accommodation sets out criteria that the Council will use to assess proposals involving student housing, including additions and losses. The policy seeks to ensure that:

- there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.
- the development of student accommodation does not involve a disproportionate loss of self-contained homes, particularly those with 3 bedrooms.
- proposals for student housing provide a good standard of living and comply with the relevant minimum standards.
- applicants include a range of accommodation wherever possible to suit students with different incomes.
- term-time occupiers are students at our recognised Higher Education Institutions, which will generally be those in Camden and adjoining London boroughs that are funded by the Office for Students.
- nomination agreements are in place to provide housing for students at one or more recognised higher education institutions, including nominations agreements for any affordable student accommodation incorporated in the development.
- new student accommodation is accessible to public transport and will not have a detrimental impact on the transport network
- the creation of mixed, inclusive and sustainable communities is supported and that residential amenity is protected.
- affordable student accommodation is provided either on site or as a contribution towards off-site delivery.
- the net loss of student accommodation is resisted.

44.3 The Council considers that the approach taken in Policy H9 is in general conformity with the London Plan 2021 (RD01). The GLA have not raised any concerns in relation to the approach taken in Policy H9. This is confirmed by the Statement of Common Ground between the Council and the GLA (SD19).

**45. Should Policy H9 make specific reference to the Bloomsbury Campus Area?**

- 45.1 In line with the London Plan (RD01), Policy H9 - Purpose built student accommodation, aims to ensure there is a supply of student accommodation to support the growth of higher education institutions across the borough, including in Bloomsbury, to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.
- 45.2 Policy S4 Bloomsbury Campus Area sets out the Council's overarching priorities for the Campus Area and supports the delivery of the Council's emerging Bloomsbury Vision, which is currently being prepared. Policy S4 states that "We will support the development of student housing in the Campus Area to serve the University of London or its member institutions where it will not compromise meeting the need for additional academic space."
- 45.3 Given that Policy H9 applies across the borough, and that the provision of student housing is already addressed in Policy S4, it is not considered necessary or appropriate to make a specific reference to the Bloomsbury Campus Area in Policy H9.
- 46. In B.1 of the Policy what is meant by "disproportionate loss", how will it be determined and is it effective?**
- 46.1 Local Plan Policy H1 Maximising housing supply indicates that self-contained housing is the priority land use of the Plan, while Policy H3 Protecting existing homes resists proposals involving the net loss of self-contained homes. In addition, Camden's Local Housing Needs Assessment (EB10) indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a three bedroom home.
- 46.2 The Council also recognises that additional student accommodation contributes towards meeting the borough's housing target (with 2.5 student rooms treated as equivalent to one home as per paragraph 4.1.9 of the London Plan (RD01)), addresses a permanent housing need, and can reduce the pressure for students to share existing large homes.
- 46.3 Policy H9 Part B.1 seeks to balance these considerations and aims to minimise the loss of self-contained homes, particularly those with 3 bedrooms, over the Plan period. The policy indicates that whether the loss of self-contained homes is acceptable (i.e. not disproportionate) will be considered on the basis of the overall addition the proposed scheme would make to housing supply. On the basis that under the London Plan (RD01) 2.5 student rooms equate to one self-contained home. The Council would expect any student housing developments that involve the loss of self-contained homes to create a net positive contribution to meeting the borough's housing target (to ensure that any loss of self-contained homes is not disproportionate).

46.4 The Council therefore considers the approach taken in Policy H9 Part B.1 to be justified and effective.

**47. Is the requirement in B.3 of the Policy to comply with relevant standards for houses in multiple occupation justified?**

47.1 Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life, and this is as true for students as it is for the wider population. Student housing should provide residents with a place for rest, relaxation, safety, privacy, and society. The design should include appropriate spaces and layouts that minimise risk to health and safety, are practical, and support adaptability and accessibility.

47.2 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation (HMOs), which apply to most student housing that is not provided by an educational institution. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers.

47.3 This is also consistent with Part A. 5 of London Plan Policy H15 Purpose Built Student Accommodation which states that “Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that the accommodation provides adequate functional living space and layout.”

47.4 The Council therefore considers it justified to require proposals for student housing to comply with the relevant minimum standards.

**48. In B.12 of the Policy how will an “appropriate contribution” be determined?**

48.1 Policy H9 Purpose Built Student Accommodation Part B.12 states that the Council will support the development of student housing provided that the development “provides affordable student accommodation or otherwise provides an appropriate contribution to affordable housing in accordance with Policy H4, particularly Part D”.

48.2 Where market-led developments of purpose-built student accommodation are proposed, the Council will apply Policy H4 of the Local Plan as far as appropriate, having regard to Part D and all specific provisions for this type of housing in this Plan and in the London Plan. In essence, the London Plan provides for the affordable housing contribution from purpose-built student accommodation to take the form of affordable student accommodation. The Council will support proposals to offer contributions in accordance with the London Plan, but in view of Camden's shortfall in affordable housing supply when compared to need, as an alternative we will strongly encourage contributions of self-contained affordable housing on-site in accordance with the guideline mix set out in Part B of Policy H4.

- 48.3 The Plan does however note that it will only be feasible to provide the Policy H4 guideline mix where the affordable housing can be provided in a separate block and / or be accessed from a separate stair / lift core, rather than being fully integrated into the purpose-built student accommodation.
- 48.4 Policy H4 Part E of the Local Plan sets out the factors that the Council will consider when determining whether affordable housing provision should be made on-site. Paragraph 7.154 of the Plan states that:

“In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability, including the availability of public subsidy, particular costs associated with the development (such as restoration of heritage assets and remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build to rent housing). Subject to the London Plan viability threshold approach, we will expect submission of a financial viability appraisal to justify the proportion of affordable housing proposed and demonstrate that the proposed affordable housing is deliverable, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme.”

- 48.5 This will therefore ensure that an appropriate contribution towards affordable housing provision is determined.

**49. The Viability Study identifies that purpose built student accommodation viability is stronger in the south of the borough. How has spatial variation informed the borough wide implementation of Policy H9?**

- 49.1 Whilst the findings of the Viability Study (EB01) note that the viability of Purpose Built Student Accommodation schemes are generally identified as being better in the south of the borough where the highest rents are achieved, the Study found that based on the London Plan approach, Purpose Built Student Accommodation schemes across the whole of the borough should be able to accommodate the provision of affordable student accommodation in line with the London Plan requirements, up to 35% dependent on the existing use value of the site (see page 112).
- 49.2 In addition to this, the Viability Study (EB01) tested a second scenario in relation to Purpose Built Student Accommodation schemes, including conventional affordable housing instead of affordable student accommodation. This is in line with Policy H4 Part D. The results of this testing identify that there are a number of scenarios where Purpose Built Student Accommodation schemes could viably support 35% conventional affordable housing and a few scenarios where up to 50% affordable housing could be supported. However, this is dependent on the existing use value of the site and the Council's climate change policies supporting and delivering sustainable developments, minimising carbon emissions, energy use and requiring the generation of renewable energy onsite.

- 49.3 Given the acute need for conventional affordable housing in the borough, and the fact that Purpose Built Student Accommodation comes forward on sites where conventional housing could otherwise be delivered, the results of the testing support the Council's objective of encouraging the delivery of conventional affordable housing in Purpose Built Student Accommodation schemes where feasible.
- 49.4 The supporting text to Policy H9 seeks to clarify that the Council will "strongly encourage" the delivery of conventional on-site affordable housing as an alternative to affordable student accommodation, subject to feasibility, as opposed to seeking conventional affordable housing (see paragraph 7.311). In addition, the provision of conventional affordable housing in Purpose Built Student Accommodation schemes will be subject to negotiation and viability, in accordance with Policy H4 Part E.7.
- 49.5 It is therefore considered that the Viability Study supports the implementation of Policy H9 across the borough and that the policy contains appropriate flexibility and is worded to enable scheme viability to be considered on a case-by-case basis.

**50. What indicators, baselines and targets will be used to monitor affordable housing and housing mix outcomes and what triggers would prompt an early review or policy adjustment?**

- 50.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.
- 50.2 The Council has sought to ensure that the policies in the Plan contain appropriate flexibility and are worded to enable 'on balance' judgements. This will help ensure that the Plan's policies remain relevant notwithstanding any changing future circumstances.
- 50.3 The Council will monitor the delivery of affordable housing and housing mix outcomes as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of affordable housing and housing mix outcomes the Council will consider whether any policy adjustments or an early review is appropriate.

## **Monitoring**

**51. What indicators, baselines and targets will be used to monitor housing mix and standard outcomes and what triggers would prompt an early review or policy adjustment?**

- 51.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.

- 51.2 The Council has sought to ensure that the policies in the Plan contain appropriate flexibility and are worded to enable 'on balance' judgements. This will help ensure that the Plan's policies remain relevant notwithstanding any changing future circumstances.
- 51.3 The Council will monitor housing mix and standard outcomes as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of the Plan's housing objectives the Council will consider whether any policy adjustments or an early review is appropriate.

## **Modifications**

### **52. Are any modifications required for soundness?**

- 52.1 The Council has proposed a schedule of main modifications (SD51) and a schedule of minor modifications (SD50) to the Camden Local Plan Proposed Submission Draft.
- 52.2 The Council has proposed modifications to Policy H1 Maximising Housing Supply. These are set out in SD51 Schedule of main modifications reference MM48.
- 52.3 Minor modifications (not relating to soundness) are also required to Policy H1 Maximising Housing Supply and Policy H4 Maximising the supply of affordable housing. These are set out in SD50 Schedule of minor modifications reference NMM02, NMM03 and NMM04.

### **Issue 3:**

**Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in addressing the accommodation needs of Gypsies, Travellers and Travelling Showpeople?**

### **Questions:**

#### **53. To what extent can the evidence of need used by the Council provide: a) A robust and up to date assessment of need that reflects current circumstances?**

- 53.1 The evidence of need for Gypsy and Traveller and Travelling Showpeople accommodation identified in the Plan is based on a robust and up-to-date assessment of need that reflects current circumstances.
- 53.2 The GLA have recently undertaken a London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA), the findings of which were published in November 2025 (EB14).

- 53.3 The GTANA was developed and undertaken in partnership with a range of stakeholders, including members of London's Gypsy, Roma, Traveller and Travelling Showpeople communities and London boroughs.
- 53.4 The GTANA calculates need in line with the approach outlined in 'Gypsy and Traveller Accommodation Needs Assessments' (guidance issued by the Department for Communities and Local Government (DCLG), 2007) and uses a range of methodologies, including fieldwork, as set out in Chapter 4 of the GTANA Report to ensure comprehensive data collection, combining both quantitative and qualitative data, to accurately assess the accommodation needs of the different Gypsy, Roma, Traveller and Travelling Showpeople communities.
- 53.5 The London-wide Gypsy and Traveller Accommodation Needs Assessment work identified a need in Camden of 11 additional Gypsy and Traveller pitches by 2031/32. This includes a predicted cultural need for 9 additional pitches over the period 2022/23 to 2026/27. This need predominantly arises from those living in bricks and mortar homes, but also includes one newly forming household. A further 2 additional pitches are identified as being required over the period from 2026/27 to 2031/32. No future need is identified for Travelling Showpeople plots.
- 53.6 The overall need for Gypsy and Traveller accommodation for the period covered by the new Local Plan (from 2026 to 2041) will, however, be higher, and is assessed to be 19 additional pitches. This includes the four existing pitches that were provided in Camden at the time the assessment was undertaken. Appendix 1 of the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04) sets out how this need requirement has been calculated.

**b) Sufficient justification for any changes in the numbers of Gypsies, Travellers or Travelling Showpeople now living the Borough?**

- 53.7 Camden has an established community of Irish Gypsy and Traveller households, of which a small proportion live on two designated Council owned sites (providing five pitches in total, including the additional pitch that has recently been provided on the existing Traveller site at Carol St), while the remainder live in conventional housing. There is also a private site for travelling showpeople at the Vale of Health in Hampstead Heath, which has been in use since the 1950's. No transit pitches are located in the borough.
- 53.8 The 2011 Census identified 167 Camden residents with the ethnicity of Gypsy / Traveller / Irish Traveller (0.08% of Camden's total population). While the 2021 Census identified a total of 128 Camden residents with the ethnicity of Gypsy / Traveller / Irish Traveller (0.06% of Camden's total population), a decline of 39 residents (a change of -0.01%), which is in line with the overall population decline recorded for Camden over this period. The 2021 Census also included a new Roma category, with 978 of Camden's residents identifying as White – Roma (0.47% of Camden's resident population).

**c) Justified assumptions on household formation rates, evidence of concealed households, overcrowding or pitches/ plots that should be accommodated in the Borough?**

- 53.9 The GLA's London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) (EB14) includes justified assumptions in relation to household formation rates, evidence of concealed households, overcrowding and pitches / plots that should be accommodated in Camden.
- 53.10 The GTANA calculates accommodation needs over two five-year periods: 2022-23 to 2026-27; and 2027-28 to 2031-32, based on a model suggested in the DCLG (2007) guidance (see above).
- 53.11 It is important to note that the assessment determines households' need for accommodation, rather than demand or preference. Households treated as in need include those with a Gypsy or Traveller aged 16 or over (at the time of the survey) whose household indicates that they will require a separate pitch or home within the next five years; those living in overcrowded accommodation; and households 'hidden' or 'doubled up' on pitches or yards (concealed households). Paragraph 4.42 of the GTANA provides further information on how accommodation need from 'overcrowding' is determined.
- 53.12 Accommodation needs for the first five-year period – 2022-23 to 2026-27 – were calculated using survey responses. Fieldwork surveys were carried out with Gypsy, Roma, Traveller and Travelling Showpeople communities living on Gypsy and Traveller and Travelling Showpeople sites and online surveys were carried out with Gypsy and Traveller and Roma households living in bricks and mortar homes. The surveys determine the proportion of households who need to move for various reasons, such as overcrowding / concealed households or to accommodate newly forming households.
- 53.13 The accommodation needs of Gypsy and Traveller households living on sites are determined for each borough using survey responses from within that borough, whereas the accommodation needs of Gypsy and Traveller, and Roma households living in bricks and mortar homes are based on survey responses received across London and then extrapolated to the whole population – i.e. all households.
- 53.14 Accommodation needs for the second five-year period (2027-28 to 2031-32) were based on applying a population growth rate derived from analysis of factors identified by the household surveys conducted for the GTANA. These factors include current population numbers; the average number of children per household; and household formation rates. The factors are used to estimate population growth over a 20-year period. Although the accommodation needs' calculations cover a 10-year period, using twice this to establish household formation rates provides a more accurate projection, accounting for longer-term trends and smoothing out annual fluctuations. The difference between the current and projected populations determines a five-year population growth rate.

- 53.15 The gross annual population growth rate for each Gypsy, Roma, Traveller and Travelling Showpeople cohort is determined in the same way, based on household survey responses. However, for specific populations some adjustments are made to the mortality rate that forms part of the annual population growth rate (similar to conventional Housing Needs Assessments). For Gypsy, Roma, Traveller and Travelling Showpeople communities (including those living on sites, and in bricks and mortar accommodation), the mortality rate has been adjusted to reflect studies indicating that their life expectancy is approximately 10 years shorter than that of the general population.
- 53.16 Net London-wide population growth rates (i.e. the gross annual population growth rate, less the mortality rate for each of the four cohorts (Gypsies and Travellers living on sites; Travelling Showpeople living on plots; and Gypsy and Traveller, and Roma households living in bricks and mortar homes)) were applied to the respective Gypsy, Roma, Traveller and Travelling Showpeople population for each borough individually. This results in borough-specific needs figures for each cohort for the second five-year period.
- 53.17 The analysis in the GTANA indicates an annual household growth rate of 3 per cent per annum (compound), equating to a five-year rate of 15.9 per cent. A mortality rate of 2.825 per cent over each five-year period is also applied. Together, these result in a net population growth rate of 13.1 per cent ( $15.9 - 2.825 = 13.075$ ). Further information on the methodology employed is set out in Chapter 4 of the London-wide Gypsy and Traveller Accommodation Needs Assessment.
- 53.18 Chapter 5 of the GTANA then assesses and calculates accommodation need for additional pitches across all London boroughs. This identifies a Gypsy and Traveller accommodation need for Camden of 11 pitches over the period from 2022/23 to 2031/32. Further information on how this need has been calculated for Camden is set out in Appendix 13 of the GTANA (Accommodation supply and needs assessment) (page 54/55). Chapter 6 of the GTANA then assesses and calculates accommodation need for additional Travelling Showpeople plots across London. No future need is identified for Travelling Showpeople plots in Camden.
- 53.19 Based on the findings of the London wide Gypsy and Traveller Needs Accommodation Assessment (2025) the Council has then calculated the need for Gypsy and Traveller accommodation over the Plan period (from 2026 to 2041). The full details of this calculation are set out in Appendix 1 of the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04).
- 53.20 It should however be noted that the compound net household growth per 5 years figure (13.6%) that was used in the calculation set out in Appendix 1 of the Gypsy and Traveller and Travelling Showpeople Topic Paper was based on an earlier draft version of the GTANA.

53.21 The final version of the GTANA (published in November 2025) uses a slightly amended figure of 13.1% (compound net household growth per 5 years). Given this, the Council has revised the calculation set out in Appendix 1 of the Gypsy and Traveller and Travelling Showpeople Topic Paper and this is set out below:

- Baseline pitches at 2026/27 = 4 existing pitches (that were provided in Camden at the time the assessment was undertaken) plus 9 identified through the London-wide GTANA = 13
- Compound net household growth per 5 years = 13.1%
- Additional pitches to 2031/32 = 13.1% of 13 = 1.703 (this is consistent with the 2 additional pitches identified through the London-wide GTANA)
- Baseline pitches at 2031/32 = 14.703 (4 existing, plus 11 additional pitches)
- Additional pitches to 2036/37 = 14.703 x 0.131 = 1.926093
- Baseline pitches at 2036/37 = 16.629093 (4 existing, plus 11 additional pitches at 2031/32, plus 2 additional pitches at 2036/37)
- Additional pitches to 2041/42 = 16.629093 x 0.131 = 2.178411183
- Baseline pitches at 2041/42 = 18.807504183 (4 existing, plus 11 additional pitches at 2031/32, plus 2 additional pitches at 2036/37, plus an additional 2 pitches at 2041/42)

53.22 In summary, at the time the assessment was undertaken there were four existing Gypsy and Traveller pitches in Camden. 9 additional pitches are then provisionally required by 2026/27. A further need for 6 pitches is then likely to arise as a result of household growth to 2041/42. The overall pitch need in Camden (including the four existing pitches that were provided at the time the assessment was undertaken) is therefore 19 (rounded).

53.23 Whilst the above calculation results in a slightly lower baseline pitch figure at 2041/42 of 18.807504183 compared to the previous figure of 19.058044928, when rounded, the overall pitch need in Camden remains the same.

#### **54. How will the need for Gypsy, Traveller and Travelling Show People within the Borough be met?**

54.1 The Local Plan identifies that the overall need for Gypsy and Traveller accommodation in Camden over the Plan period to 2041 is 19 additional pitches. This figure includes the existing four pitches that were provided in Camden at the time the assessment was undertaken.

54.2 The Council proposes to meet this need through a combination of site allocations and windfall sites (unallocated sites). To this end the Plan allocates two sites to help meet the accommodation needs of Gypsies and Travellers:

1. Site Allocation S20 - York Way Depot and adjacent land at Freight Lane. It is estimated that this site can deliver four pitches as part of the wider mixed use development of the site; and

2. Site Allocation C27 - Land adjacent to Constable House, Adelaide Rd. It is estimated that this site can deliver two pitches.

54.3 The Council has proposed a main modification to Part D of Policy H11 Accommodation for Travellers to more explicitly support the delivery of windfall sites (unallocated sites) to help meet the identified need for Gypsy and Traveller Accommodation in Camden (see SD51 Schedule of main modifications reference MM51).

54.4 A further pitch was provided in 2025 on the existing Traveller site at Carol St in Camden, which also counts towards meeting the identified need.

54.5 With regards to Travelling Showpeople, the Council will continue to protect the one existing Travelling Showpeople site in Camden at the Vale of Health, in accordance with Part B of Policy H11 Accommodation for Travellers. The GLA's Gypsy and Traveller Accommodation Needs Assessment 2025 (EB14) does not identify a need for additional plots for Travelling Showpeople in Camden.

**55. Is the approach to Policy H11 consistent with the Planning Policy for Traveller Sites (PPTS) insofar as it expects plans to a) identify a supply of specific deliverable sites to provide 5 years worth of sites against locally set targets and b) to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15?**

55.1 The table below sets out Camden's pitch targets and anticipated supply over the plan period from 2026/27 to 2040/41.

Period	Pitch Target	Cumulative Total Pitch Target	Anticipated Supply	Cumulative Total Anticipated Supply
2026/27 – 2030/31 Yrs 0 - 5	11	11	2 (from C27 Land adjacent to Constable House)	2
2031/32 – 2035/36 Yrs 6 - 10	2	13	4 (from S20 York Way Depot and adjacent land at Freight Lane)	6
2037/38 - 2041/42 Yrs 11 - 15	2	15	unknown	unknown

55.2 The Council's five year supply position for Gypsy and Traveller accommodation for the first five years of the plan period (2026/27 – 2030/31) is then set out in the table below.

<b>Need (2026/27 – 2030/31)</b>		
5 Year need	11 pitches	Based on figures for 2022/23 to 2031/32 from the London wide GTANA
Completions	1 pitch	1 pitch delivered as part of the intensification of the existing Traveller site at Carol St (in 2025)
5 Year need (2026/27 – 2030/31) taking account of existing supply	10 pitches	11 pitches minus 1 completion
<b>Supply (2026/27 – 2030/31)</b>		
Total supply of deliverable sites	2 pitches	2 pitches to be delivered on Site Allocation C27 land adjacent to Constable House
<b>Shortfall</b>		
Shortfall against need	8 pitches	10 pitches (need) minus 2 pitches (supply)
<b>Number of years supply</b>		
Five Year Supply Position	1 year	Annual need = 5 year need (taking account of completions) divided by 5 years = 10 divided by 5 = 2 pitches 2 pitches (supply) divided by annual 2-pitch need = 1 year

55.3 Given that the Council has not been able to identify a five year supply of deliverable sites against our requirement and will be unable to meet the need for Gypsy and Traveller accommodation in full over the Plan period to 2041, it wrote to all London Borough's under the Duty to Co-operate.

55.4 In our letter dated the 23 May 2025 (see Appendix 5 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04) we asked all London Boroughs whether they would be in a position to assist Camden in meeting the accommodation needs of Gypsies and Travellers. Sixteen boroughs responded, and all confirmed that they are not in a position to assist. In September 2025, the Council contacted all boroughs who did not reply to the Duty to Co-operate letter sent in May 2025, asking them to confirm their position. Replies were received from ten boroughs and all confirmed that they were not in a position to assist.

- 55.5 In addition to this, the Council has also held regular duty to co-operate meetings with neighbouring authorities where Gypsy and Traveller provision has been discussed. Further information on this is set out in the Council's Duty to Co-operate Statement (SD17) and the Council's letter to the Inspector dated the 12 December 2025 (ED03).
- 55.6 Meeting the level of need for Gypsy and Traveller accommodation in Camden is exceedingly challenging given its character as a densely developed inner London borough, with limited land available for development. This is further complicated by the fact that any site identified for Traveller pitches in the borough will have an existing use value which is likely to far exceed its value as a Gypsy and Traveller pitch, rendering the development of the site unviable. The Council considers that it has done all it reasonably could to meet the need for Gypsy and Traveller accommodation, given the challenges that exist, although it has not been possible to identify sufficient sites to meet the identified need for Gypsy and Traveller accommodation in full or find other local authorities able to assist with meeting Camden's needs.
- 55.7 Notwithstanding this, the Council has fully followed the procedures set out in legislation and national and regional policy, and therefore considers that the approach it has taken to meeting the need for Gypsy and Traveller accommodation through the Local Plan is sound.
- 56. How does the Plan address the needs of Gypsies in light of the Smith v Secretary of State [2022] EWCA Civ 1391 judgement regarding the interpretation of Planning Policy for Traveller Sites and the application to Gypsies and Travellers who have ceased to pursue a nomadic lifestyle?**
- 56.1 The definition of Gypsies and Travellers set out in the government's Planning Policy for Traveller Sites (PPTS) was updated in 2023 to reflect the judgement made in relation to Smith v Secretary of State for Levelling Up, Housing and Communities [2022] EWCA Civ 1391. The government then made a further update to the PPTS definition of Gypsies and Travellers in 2024.
- 56.2 The Plan has been prepared based on the definition of Gypsies and Travellers set out in the 2024 PPTS, which states that "Gypsies and Travellers" means:  
"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such." (Annex 1)
- 56.3 The GLA Gypsy and Traveller Accommodation Needs Assessment 2025 (EB14) was also prepared taking into account the definition of Gypsies and Travellers set out in the 2024 PPTS.

- 56.4 The Council's Gypsy and Traveller Site Identification Study (EB12) was prepared based on the definition of Gypsies and Travellers set out in the 2023 PPTS, therefore also taking into account the 2022 judgement.
- 56.5 The Plan identifies the need for Gypsy and Traveller accommodation in Camden based on the definition set out in the PPTS 2024 and sets out the Council's strategy for meeting the identified need (see Local Plan Policy H11 Accommodation for Travellers and Topic Paper TP03 Gypsy and Traveller and Travelling Showpeople for further information).
- 56.6 It is therefore considered that the Plan addresses the needs of Gypsies in light of the Smith v Secretary of State [2022] EWCA Civ 1391 judgement regarding the interpretation of Planning Policy for Traveller Sites and the application to Gypsies and Travellers who have ceased to pursue a nomadic lifestyle.

**57. Does the Plan respond appropriately to the needs of other members of the travelling community, including Travelling Show People and Boat People?**

- 57.1 The Council considers that the Plan responds appropriately to the needs of other members of the travelling community, such as Travelling Showpeople and Boat People.
- 57.2 Camden has one private site for travelling showpeople at the Vale of Health, which has been in use since at least the 1950s. Known as the North Fairground site, the yard also hosted a fair on bank holidays until the early 2000s. The site was owned and operated by a family of Travelling Showpeople until late 2020, when it was sold to an individual with no connection to fairs or showpeople. The number of showpeople living on the site has diminished in recent years, while the number of occupants in unrelated occupations has increased.
- 57.3 The GLA Gypsy and Traveller Accommodation Needs Assessment 2025 (EB14) considered the needs of Travelling Showpeople across London and identified no need for additional plots for Travelling Showpeople in Camden.
- 57.4 The Housing Act 2004 (as amended) requires local authorities to consider the accommodation needs of people residing in houseboats moored on inland waterways. Camden's only navigable waterway is the Regent's Canal, which traverses the Central and South sub-areas of the borough from Regent's Park to King's Cross.
- 57.4 Part B8 of Policy H6 sets out the Council's approach to the creation of additional residential moorings. The Policy seeks to achieve an appropriate balance between the aspiration for additional residential moorings, maintaining the Canal's value from open space, biodiversity and historical perspectives, and ensuring that waterside land is used efficiently. In applying the policy, the Council will seek to ensure that housing delivery is optimised on waterside sites in accordance with Policy H1, and

the overall number of homes provided is not compromised in order to deliver a modest addition to the supply of residential moorings.

- 57.5 The Regent's Canal is a metropolitan site of importance for nature conservation (SINC), is a designated open space, and is also at the heart of the Regent's Canal Conservation Area. Both the SINC and the open space include the towpath and some further elements of the banks (although the areas designated are not identical), whilst the Conservation Area extends more widely to include other parts of the Canal's historic context.
- 57.6 On the basis of data from the Valuation Office Agency, the Council understands that there are fewer than five permanent residential moorings in the borough, split between Granary Moorings (to the east of St Pancras Hospital, Allocation S8), and the Cumberland Basin adjacent to Regent's Park. The only other basin in Camden is adjacent the Midland Main Line railway at Camley Street. This facility is operated by the St Pancras Cruising Club, and provides non-residential moorings only.
- 57.7 In 2018, the Canal and River Trust, which maintains canals and navigable rivers in England and Wales, published the London Mooring Strategy (RD42) to manage growth in the number of boats moored in London's waterways. Overall, the strategy seeks to relieve pressure on moorings in busier parts of the network such as the Regent's Canal by creating short-stay visitor moorings and increasing the monitoring and management of existing moorings, whilst indicating that there is greater potential for additional permanent residential moorings in quieter parts of the network such as the Grand Union. The strategy also identifies potential to reinstate long-term moorings on the bank opposite the towpath adjacent to Goods Way at King's Cross.

**58. Has the need for any transit sites within the Borough been considered and where appropriate addressed?**

- 58.1 The GLA Gypsy and Traveller Accommodation Needs Assessment 2025 (EB14) identifies a need for 87 transit pitches across London, however it does not allocate the need to individual boroughs.
- 58.2 This need has been identified based on analysis of data from the MHCLG Traveller Caravan Count from January 2016 to January 2024 and takes into account the number of caravans recorded on unauthorised pitches in each London borough.
- 58.3 The data from the latest MHCLG Traveller Caravan Count published in July 2025 shows that for the last six caravan counts no unauthorised pitches have been identified in Camden<sup>1</sup>. Furthermore, there are no transit sites in Camden.
- 58.4 Given this, there is not considered to be a need to identify locations for transit sites within Camden.

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<sup>1</sup> See [Traveller Caravan Count Live Tables July 2025 final for publication.ods](#)

**59. Do the requirements of criterion B of Policy H11 provide a positively prepared and effective approach to safeguarding existing sites to support the needs of Gypsies, Travellers and Travelling Showpeople?**

59.1 The Council considers that the requirements of Part B of Policy H11 provide a positively prepared and effective approach to safeguarding existing sites to support the needs of Gypsies, Travellers and Travelling Showpeople.

59.2 There are currently two existing Council owned Traveller sites in Camden. One site is located in Kentish Town on Castlehaven Road, adjacent to a terraced property. The other is on Carol Street in Camden Town, located next to terraced houses and a small park. There is also a private site for travelling showpeople at the Vale of Health in Hampstead Heath.

59.3 Part B of Policy H11 Traveller Accommodation states that:

“We will protect existing lawful sites, plots and pitches for travellers and travelling showpeople. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, pitches and/or plots in suitable locations, or are demonstrably no longer needed.”

59.4 This represents a continuation of the policy approach in the current adopted Local Plan 2017 (Policy H11) which has previously been found sound at public examination and has been effective at safeguarding the existing sites for Gypsies and Travellers and Travelling Showpeople in Camden.

59.5 The protection of existing sites is part of the Council's strategy to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Camden, which has been discussed with neighbouring boroughs under the Duty to Co-operate. Further information on how the Council has engaged with neighbouring boroughs under the duty to co-operate is set out in the Council's Duty to Co-operate Statement (SD17) and the Council's letter to the Inspector dated the 12 December 2025 (ED03).

**60. Criterion C of Policy H11 allocates 2 permanent traveller pitches. What process and methodology did the Council use to identify and determine which sites to allocate? Is the approach sound?**

60.1 To inform the preparation of the draft Local Plan, a call for sites for Gypsy and Traveller accommodation was held in Winter 2022/23. Previous calls for sites were also undertaken as part of the consultation on the draft Site Allocations Local Plan in 2020 and 2021/22 before the decision was made to incorporate site allocations within the local plan. No sites for Gypsy and Traveller accommodation were submitted to the Council for consideration in response to any of these calls for sites and no Gypsy and Traveller sites have been submitted as part of the Regulation 18 and Regulation 19 consultations on the draft Plan.

- 60.2 In 2023, the Council commissioned Aecom to undertake a Gypsy and Traveller Site Identification Study (EB12 and EB13). The purpose of this work was to identify a shortlist of Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.
- 60.3 The study focussed on Council-owned sites, as (given the absence of any positive response to the call for sites) it is considered improbable that sites in private ownership would deliver accommodation for Gypsy and Travellers. This is due to the fact Traveller pitches have a low value relative to other land uses in Camden, meaning that if a site is identified for use as Traveller accommodation, its value would be significantly reduced, rendering the development of sites in private ownership unviable.
- 60.4 The provision of Gypsy and Traveller pitches was tested as part of the viability work to support the Local Plan carried out by BNP Paribas. This looked at the impact on viability of providing both a single pitch and four pitches against a number of typologies and as part of the strategic site allocations. The results of this work are set out in Appendix 6 of the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04).
- 60.5 As part of the Gypsy and Traveller Site Identification Study, Aecom undertook a high level sifting exercise using GIS, assessing 2,821 Council freehold sites and 243 leasehold sites, based on agreed policy criteria and available mapped constraints.
- 60.6 The sifting stage involved three sub-stages, sifting sites based on their availability, suitability, and achievability for Gypsy and Traveller accommodation, to produce a shortlist of sites for further assessment and consideration by the Council. As part of this sifting exercise sites were ruled out for the following reasons:
- Site unavailable as not in Council ownership
  - Site size – sites under 150 sqm were excluded
  - Site covered by a primary constraint, including:
    - Allotments, open space, Local Plan habitat corridor, Local Green Space, Local Nature Reserve, SINC, SSSI, Priority Habitat Inventory and Playgrounds
    - Article 4 Directions on land use
    - Council owned homes and residential garden land
    - HS2 Phase 1 Safeguarding, Rail and Road;
    - Listed buildings, Local List, Registered Parks and Gardens and Scheduled Monuments
    - Aggregates safeguarding area
    - Overlooking (sites located at less than 18m distance from a building of more than 12m / 4 storeys in height were excluded where a fence cannot be expected to mitigate issues of overlooking)
    - Schools.
  - Site achievability, including access (not feasible to create a connection to the public highway); proximity to other uses which are likely to be incompatible with development of Traveller sites; loss of amenity or community value (for example,

sites in use as allotments, nurseries, or playgrounds); land with recent planning permissions, allocations, regeneration or estate renewal schemes that have commenced / completed.

- 60.7 Further information on the approach to site sifting is set out in Section 2 (Methodology) of the Gypsy and Traveller Site Identification Study (EB12) and a list of sites considered and their reason for exclusion is set out in the Gypsy and Traveller Site Identification Study Appendices (EB13).
- 60.8 The Study identified a shortlist of 18 sites that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council (with some sites containing more than one parcel of land).
- 60.9 The reasons why these sites were shortlisted as part of the Study are set out in Appendix 3 of the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04). This information has been extracted from Appendix 1 of the Gypsy and Traveller Site Identification Study for ease of reference. The Study was then published for comment.
- 60.10 Following this, Council officers undertook a more detailed availability and suitability assessment of the shortlisted sites, in discussion with other Council teams. As part of the suitability assessment of the sites, officers visited the remaining sites to assess their suitability for the provision of Gypsy and Traveller accommodation. Factors considered as part of this assessment included:
- existing use
  - site size / shape / layout
  - topography
  - physical constraints
  - access
  - impact on amenity / overlooking
  - flood risk
  - potential connection to infrastructure
  - access to nearby facilities/ services
  - potential to re-provide existing uses elsewhere.
- 60.11 The findings of this work are set out in Chapter 6 of the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04) and relevant Appendices.
- 60.12 On the basis of this further assessment work and the comments made through the consultation and by other Council services, it was considered that the land adjacent to Constable House and the land at Freight Lane were suitable for allocation to help meet the accommodation needs of Gypsies and Travellers.
- 60.13 These sites were therefore allocated in the Camden Local Plan Proposed Submission Draft to help meet the accommodation needs of Gypsies and Travellers

in Camden (see Site Allocations C27 Land adjacent to Constable House and S20 York Way Depot and adjacent land at Freight Lane). It is envisaged that provision at Freight Lane would be taken forward as part of the wider redevelopment of the site.

- 60.14 The reasons other sites assessed were considered to be unsuitable included access constraints, an unacceptable degree of overlooking, sites being used as amenity space / space for food growing, loss of necessary parking, and loss of servicing for retail units. Further information on this is set out in Table 1 and Appendix 4 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04.
- 60.15 While the Council has taken a proactive approach to the identification of sites to provide Traveller pitches to help meet identified need, it has not been possible to identify a sufficient number of sites to meet that need in full. This is primarily due to Camden being a densely developed inner London authority with a limited availability of brownfield land and no greenfield sites. The two existing Gypsy and Traveller sites in Camden are on small, constrained sites in existing residential areas and it is not possible to expand them further or introduce further pitches onto them. Camden does not have the options available to other councils of delivering pitches through the extension of existing sites or allocations in the Green Belt.
- 60.16 It is considered improbable that sites in private ownership would deliver accommodation for Gypsy and Travellers due to the impact on the viability of any development scheme (as demonstrated by the Gypsy and Traveller Viability testing undertaken by BNP Paribas set out in Appendix 6 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04). As land is a scarce resource in Camden, and there is strong demand / requirements both for existing uses and for other uses to be delivered, the delivery of a low density use on land results in an opportunity cost compared to other land uses, that would have to be foregone on the site.
- 60.17 The Council has fully followed the procedures set out in legislation and national and regional policy, and has identified all possible sites. It therefore considers that the approach it has taken to meeting the need for Gypsy and Traveller accommodation through the Local Plan is sound.
- 61. Does the requirements of criterion D of Policy H11 provide a positively prepared approach in setting criteria for sites to come forward as windfalls and is the approach justified and consistent with paragraphs 25-28 of the PPTS?**
- 61.1 The Council considers that the requirements set out in Part D of Policy H11 provide a positively prepared approach to setting criteria for sites to come forward as windfalls, to help address the identified shortfall in need. The approach is justified and consistent with national policy, which would also be a material consideration in the determination of any planning application.

- 61.2 The Local Plan seeks to ensure that new sites / pitches that come forward in Camden are both adequate and appropriate to the needs of the Traveller community and integrated with adjoining communities. All proposals for sites, plots and pitches for Travellers and Travelling Showpeople, whether allocated in the Local Plan, identified by the Council or proposed independently, will be expected to meet the criteria set out in Policy H11 and the requirements of the government's Planning Policy for Traveller Sites (ND02). Proposals will also be expected to satisfy all other relevant Local Plan policies, including those relating to the impact of development and the protection of green infrastructure.
- 62.3 The Council considers that the requirements set out in Part D of Policy H11 present an appropriate strategy for the assessment of planning applications for new sites, pitches and/or plots for Travellers, taking into account reasonable alternatives. The criteria are aligned with those set out in Section 3 Plan Making of the Planning Policy for Traveller Sites 2024 (ND02) and consistent with paragraphs 25 to 28 of the Planning Policy for Traveller Sites 2024 (ND02) which relate to determining planning applications for traveller sites. (Although paragraph 26, which relates to development in the open countryside and rural areas, would not apply in Camden.)
- 62.4 Part D of Policy H11 Accommodation for Travellers in the Submission Draft Local Plan states that:
- “The Council will require new sites, pitches and/or plots for travellers to:
1. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
  2. be capable of connection to energy, water and sewage infrastructure;
  3. provide safe access to and from the main road network;
  4. support the health and well-being of occupiers;
  5. provide an appropriate layout and facilities;
  6. provide a good level of residential amenity;
  7. be attractive and of the highest design quality; and
  8. protect local amenity and the environment.”
- 62.5 To ensure that the Policy more explicitly supports the delivery of windfall sites (unallocated sites) to help meet identified need the Council has proposed the following main modification to Part D of Policy H11 (see SD51 Schedule of main modifications reference MM51):
- “The Council will support the delivery of windfall sites to help meet the accommodation needs of Camden’s Traveller community. The Council will require new sites, pitches and/or plots for Travellers to:”
- 62.6 Also, the Council has also proposed to insert the following criteria into Part D of Policy H11 (following criteria 8) in response to the comments made by the London Gypsies and Travellers at Regulation 19 stage (see Responder ID294 Comment 9):
9. be designed in consultation with representatives of the local Traveller community. Applications for new sites, pitches and/or plots for Travellers should

be accompanied by a detailed Management Plan. (see SD51 Schedule of main modifications reference MM52).

## **Monitoring**

### **62. What indicators will the Council use to monitor Gypsy, Traveller and Travelling Showpeople needs and what triggers would prompt an early review or policy adjustment?**

- 62.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.
- 62.2 The Council has sought to ensure that the policies in the Plan contain appropriate flexibility and are worded to enable 'on balance' judgements. This will help ensure that the Plan's policies remain relevant notwithstanding any changing future circumstances.
- 62.3 The Council will monitor the delivery of new pitches to meet the accommodation needs of Travellers as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of Gypsy and Traveller accommodation to meet identified needs, the Council will consider whether any policy adjustments or an early review is appropriate.

## **Modifications**

### **63. Are any modifications necessary for soundness?**

- 63.1 The Council has proposed a schedule of main modifications (SD51) and a schedule of minor modifications (SD50) to the Camden Local Plan Proposed Submission Draft.
- 63.2 The Council has proposed modifications to Policy H11 Accommodation for Travellers. These are set out in SD51 Schedule of main modifications reference MM49 – MM54 and MM75 – MM77.
- 63.3 Minor modifications (not relating to soundness) are also proposed to the supporting text of Policy H11 Accommodation for Travellers. These are set out in SD50 Schedule of minor modifications reference NMM05 – NMM06.