

# London Borough Camden Statement on Matter 4 - Housing Land Supply

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:**

**Whether the Local Plan is justified, effective and consistent with national policy, and in conformity with the London Plan in relation to demonstrating the housing land supply position throughout the plan period.**

## **Questions:**

- 1. What is the relevant 5-year period on adoption and what is the 5-year housing land requirement?**
  - 1.1 The Council has prepared the Local Plan on the basis that the Plan period will be 1 April 2026 to 31 March 2041, and accordingly that the relevant period for the 5-year housing land supply on adoption will be 1 April 2026 to 31 March 2031.
  - 1.2 The adoption date is now expected to be after 1 April 2026, but the Council anticipates that the Plan will be adopted within the financial year 2026-27. Completions are generally monitored by financial year, so data would not be available to provide for a start date part of the way through the financial year.
  - 1.3 The NPPF sets out provisions related to the 5-year requirement in paragraphs 72 and 78, which are further explained in Planning Practice Guidance. The Council's calculation of these requirements is set out in section 8 of the Housing Trajectory and Five Year Housing Land Supply Note (SD14) and below.
  - 1.4 The London Plan 2021 sets out housing requirements for 2019/20 to 2028/29, which for LB Camden is 1,038 additional homes per year. Accordingly, the initial housing requirement for the three years 2026/27, 2027/28 and 2028/29 is  $3 \times 1,038 = 3,114$  additional homes.
  - 1.5 The 15-year housing target set out in Local Plan Policy H1 (11,550 additional homes) includes the initially anticipated backlog (calculated at Reg 18 stage) of 1,721.4 additional homes against the London Plan requirements spread across the subsequent twelve years of the Local Plan period (further explanation of the backlog is provided in response to question 6 below). However, the NPPG requires the full backlog to be addressed in the first five years of the Plan period (see paragraph 22 of the NPPG on Housing supply and delivery). Consequently, as a first step, the

initially anticipated backlog needs to be removed from the final twelve years of the Local Plan housing target.

- 1.7 The Local Plan housing target for the final 12 years of the plan period from 2029/30 to 2040/41 is 8,436 additional homes (that is, 11,550 minus 3,114). After the removal of the initially anticipated backlog this becomes 6,714.6 additional homes over twelve years, or 559.6 additional homes per year (so, 8,436 minus 1,721.4). The starting point for calculating the 5-year requirement is thus the 3-year target for 2026/27 to 2028/29 (3,114) plus 2 years at 559.6 (1,119.2), which equals 4,233.2 additional homes.
- 1.8 As set out in paragraph 8.5 of SD14 and in the response to question 6 below, the anticipated backlog against the London Plan requirements at the start of the Local Plan period is now considered to be 2,724.8 homes. In accordance with the NPPG, this should be added to the 5-year housing requirement. This gives a total of 6,958 additional homes (4,233.2 plus 2,724.8).
- 1.9 Camden's Housing Delivery Test result was below 85% in 2021, 2022, and 2023 (published in 2022, 2023 and 2024 respectively). Consequently, NPPF paragraph 78 indicates that a buffer of 20% should be added to the housing requirement for the first five years. Applying this to the 5-year target with the full backlog included gives a total 5-year requirement of  $6,958 \times 1.2 = \mathbf{8,349.6 \text{ additional homes}}$ .
- 1.10 The Council notes that the inclusion of the full backlog and buffer increases the 5-year requirement from 4,233.2 to 8,349.6, an uplift of 4,116.4 additional homes. Thus the 5-year requirement including buffer represents 72.3% of the total Local Plan housing target of 11,550. The challenges in delivering these additional homes in the first five years of the Plan period are discussed in response to questions 4 and 5 below.
- 1.11 The Council further notes that the remaining target for the subsequent 10 years of the Plan period would drop to 320 additional homes per year (calculated by taking the 15-year target of 11,550, then taking away the five year requirement of 8,349.6 to leave 3,200.4, then dividing by 10 for an annual figure).

**2. Does the trajectory identify the components of the housing land supply across the plan period with sufficient clarity? Is it based on up-to-date evidence?**

- 2.1 The Council considers that the housing trajectory identifies the components of the housing land supply across the plan period with sufficient clarity. The Housing Trajectory and Five Year Housing Land Supply Note (SD14) divides the sites included in the housing trajectory between the four sub-areas of the borough, and between allocated and unallocated sites. SD14 also breaks down overall delivery between delivery from major self-contained sites, from smaller self-contained

developments (which are windfalls from 2028/29), and from non-self-contained developments. The trajectory also shows the spread of the anticipated delivery of 12,819.9 additional homes across the Plan period, indicating a supply of 4,733.3 additional homes in the first five years, 3,880.6 additional homes in the second five years, and 4206 additional homes in the final five years.

- 2.2 The Camden Housing Land Supply table (ED03s) adds further detail in terms of the planning status of individual sites, including unallocated major development sites forming part of the supply, and the contribution of non-major development sites in the form of existing permissions and anticipated windfalls. (The response to question 14 below also breaks down overall delivery by planning status for the first five years of the Plan period.)
- 2.3 The Council maintains a live copy of the trajectory, which is updated in relation to major developments as information emerges (e.g. from resolutions of Planning Committee, determination of applications, site visits and inspections carried out in association with Construction Management Plans) and annually in relation to non-major developments.
- 2.4 The most recently published housing trajectory was produced at the end of September 2025 and published upon submission of the Local Plan in the Housing Trajectory and Five Year Housing Land Supply Note (SD14). This took account of anticipated planning decisions over coming months, having regard to Planning Performance Agreements with applicants and prospective applicants, and advance scheduling arrangements for future Planning Committees.
- 2.5 The Camden Housing Land Supply table (ED03s) published in December 2025 is consistent with the Trajectory produced in September 2025 and incorporated in SD14. We are aware that the planning status of some sites has changed since the publication of ED03s, as follows:
- one scheme has progressed to being under construction (Car Park adjacent to Harrington Square in the Central Sub-Area (unallocated));
  - one scheme has progressed to permission granted (site W4 13 Blackburn Road);
  - four schemes that have progressed to a resolution to grant planning permission subject to completion of a S106 legal agreement (site S5 120-136 Camley Street, S6 Cedar Way, C13 West Kentish Town Estate, and 180 Arlington Road and 14 Parkway in the Central Sub-Area (unallocated));
  - one scheme has progressed to submission of a planning application (Raglan St garages in the Central Sub-Area (unallocated)).
- This progress will continue across other sites, and reflects the routine operation of the planning and development process.
- 2.6 As indicated in para 5.4 of SD14, if new information becomes available that will materially affect the trajectory or the five-year housing land supply, we will submit an update of this assessment to the Inspector.

- 3. The Council Housing Trajectory and 5 Year Housing Land Supply Note (SD14) provides 3 different 5 year housing land supply results; 5.2 years, 4.4 years and 2.8 years. Which of the supply results is the Council relying upon for soundness and does this comply with national policy requirements for backlog and a buffer?**
- 3.1 As set out in section 8 of the Housing Trajectory and Five Year Housing Land Supply Note (SD14):
- there would be a housing land supply of 5.2 years if no buffer was applied, and no backlog was added to the early years in relation to the 2019/20 to 2028/29 targets in the London Plan 2021;
  - there would be a housing land supply of 4.4 years if a 20% buffer was applied, but again no backlog was added to the early years in relation to the 2019/20 to 2028/29 targets in the London Plan 2021; and
  - there would be a housing land supply of 2.8 years with the addition of the full anticipated backlog in relation to the 2019/20 to 2028/29 targets in the London Plan 2021, followed by the application of the 20% buffer.
- 3.2 As set out in response to question 1 above, the Council considers that the full five year housing requirement consistent with the NPPF, associated PPG and the London Plan 2021 is 8,349.6 additional homes, which is equivalent to 1,669.9 additional homes per year. The housing trajectory included in SD14 shows a 5-year housing land supply of 4,733.3 homes. Consequently, the housing land supply result that conforms fully with national requirements is 2.8 years (4,733.3 divided by 1,669.9).
- 3.3 It should however be noted that housing requirement in the London Plan (RD02) is a capacity based requirement, informed by the 2017 London wide Strategic Housing Land Availability Assessment (RDI6), and the London Plan recognises that “development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered” (para 4.1.3) and “there will inevitably be variations in housing completions from one year to the next, as well as a degree of uncertainty in the delivery and phasing of large sites” (para 4.1.9). Camden has an inflexible finite brownfield land capacity, and the addition of buffers and backlogs will not improve housing delivery. This is why it is not open to the Council to increase the housing target in the Local Plan, as by definition a capacity based housing requirement cannot be increased unless additional sources of supply have been identified.
- 3.4 The London Plan is currently being reviewed, and will result in a new capacity-based housing target for Camden (as noted in para 5.5 of SD14). 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 very 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 beyond that already identified through the comprehensive site identification process carried out for the Local Plan (see TP03 Site Selection and Allocation Topic Paper).

- 3.5 The Council considers it has done all it reasonably can to identify sites to maximise housing supply. However meeting the need for housing in Camden is exceedingly challenging given the borough's densely developed inner London character, and the fact there is limited land available for development.
- 3.6 Whilst it cannot demonstrate a five year housing land supply through the Local Plan from the date of adoption, the Council proposes to meet in full the housing target set by the Local Plan over the Plan period. The Council therefore considers that it has taken an appropriate approach, there being no reasonable alternatives and based on proportionate evidence. Therefore, we consider that the approach is sound.
- 4. What modifications would be required to make the Plan deliverable in the event that only 2.8 year supply could be shown, with national backlog and buffer requirements on top?**
- 4.1 As indicated in response to question 3 above, the 2.8 year housing land supply already takes full account of the national and London Plan requirements in relation to the addition of the backlog and application of a buffer.
- 4.2 The Council considers that it has done all it reasonably can to identify land to meet the identified need for homes in a sustainable manner and it does not consider that it is possible to identify any other significant development opportunities within the borough. Further information in relation to this is set out in the Housing Topic Paper (TP10).
- 4.3 The Council also considers that it has included all sites within the five-year housing land supply that qualify as deliverable in accordance with national guidance. Only two major developments involving housing that have planning permission or a resolution to grant subject to completion of S106 have been excluded from the five-year supply, the first because there has been no evident activity on-site since permission was granted in 2020, and the second because the Council resolved to grant permission in February 2023, but the applicant's legal team has not subsequently been able to effectively progress the S106 planning obligations with the Council. These two sites relate to a potential for 22 additional homes.
- 4.4 All land expected to become available over the Plan period is brownfield land, and in the vast majority of cases there is existing development on the site with existing uses, occupiers and leaseholders. For development to commence, existing uses / occupiers need to re-locate or consolidate, and leases need to be renegotiated, terminated or bought out. Such activities would not be expected to take place prior to

exploration of planning opportunities and constraints through pre-application discussions. In this context, it is considered highly unlikely that any of the sites identified by the Local Plan and involving 50-or-more homes will come forward in the first five years of the Plan period unless a planning application has been submitted or there are already pre-application discussions in progress. Consequently, there is no realistic prospect of bringing sites forward from later in the Plan period.

- 4.5 Similar constraints also affect the later phases of identified sites involving 500-or-more homes, where only the initial phase is expected to deliver within the first five years. For example, in the case of Site W2 O2 Centre, car park and car showroom sites, whilst phase 1 has full planning permission and relates to a cleared site / existing car park, phases 2 and 3 have outline consent and relate to existing occupied buildings. In the case of Site C13 West Kentish Town Estate, the development involves the demolition of 316 existing homes, and the programme has been devised to enable tenants to move from their existing home to a newly built home on the Estate as far as possible, leading to an indicative programme of eight phases. The first phase has a resolution to grant full planning permission and involves demolition of only seven existing homes, but will create 52 new homes. Subsequent phases benefit from a resolution to grant outline consent rather than a full permission, and involve much more substantial demolition.
- 4.6 With the exception of sites involved in the Euston Area Plan, the Council is not aware of any sites, or phases of sites, that are dependent on prior delivery of public infrastructure (such as highway works or sewer capacity), or that could be accelerated by earlier public infrastructure delivery.
- 4.7 Therefore, the Council does not consider that there are any evident modifications that could be made to the Local Plan that would bring forward significant additional supply of housing land within the first five years of the Local Plan period.
- 4.8 Furthermore, given the borough's specific circumstances the Council considers it has done all it reasonably can to identify land for housing in the Local Plan to maximise housing supply and it does not consider that it is possible to identify any other significant development opportunities within the borough.
- 4.9 It is the Council's view that the Plan's approach is therefore consistent with paragraph 130 of the NPPF which states that "plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible". Furthermore, the Council has contacted all London boroughs under the duty to co-operate and none have been able to assist.
5. **Document SD14 states at paragraph 5.3 that increasing delivery or adding a buffer in the early years "would not be achieved". What evidence supports the statement that additional early period uplift or the addition of a buffer is "not**

**achievable” and how does this affect the effectiveness of the anticipated supply?**

- 5.1 The Council considers that it has done all it reasonably can to identify land for housing and it has included all sites within the five-year housing land supply that qualify as deliverable in accordance with national guidance. The sites that are expected to be delivered within the first five years and the subsequent ten years of the Plan period are clearly set out in the Housing Land Supply Table ED03s, together with the planning status of those sites.
- 5.2 The vast majority of the sites appearing in the five-year housing land supply have planning permission, a resolution to grant subject to completion of S106, or a submitted planning application following positive pre-application discussions. Four further sites have been included following pre-applications, and in the case of two of those, the submission of planning applications is anticipated shortly (these four sites are discussed further in response to question 9 below). Of the major development sites that involve housing and have planning permission or a resolution to grant subject to completion of S106, only two have been omitted from the five-year supply, as discussed in response to question 4 above, and these relate to the potential for 22 additional homes.
- 5.3 Planning practice guidance suggests that the addition of a buffer involves bringing forward additional sites from later in the Plan period (ID: 68-023-20241212). The response to question 4 above sets out the challenges that would prevent identified sites from delivering homes in the first five years of the Plan period and why they are expected to come forward in the subsequent ten years.
- 5.4 Whilst the Council cannot demonstrate a five year housing land supply through the Local Plan from the date of adoption (including the full backlog and buffer), the Council proposes to meet the housing target set by the Local Plan over the Plan period, therefore the Council does not consider that not providing for a five-year supply including the full backlog and buffer renders the housing supply ineffective. The Council has done all it reasonably can to identify land for housing in the Local Plan to maximise housing supply and it does not consider that it is possible to identify any other significant development opportunities within the borough. It should also be noted that self-contained housing has been the priority land-use in Camden for many years, and if it were possible for the Council to identify additional capacity, it would have done so. It is the Council’s view that the Plan’s approach is therefore consistent with paragraph 130 of the NPPF which states that “plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”. Furthermore, the Council has contacted all London boroughs under the duty to co-operate and none have been able to assist.
- 5.5 It should also be noted that the scale and rate of housing delivery anticipated by Local Plan Policy H1 (Maximising housing supply) and included in the housing

trajectory do not in any way constrain or prevent the delivery of additional housing. Policy H1 currently states "The Council will aim to deliver **at least** 11,550 additional homes from 2026/27 to 2040/41" [emphasis added]. Furthermore, the Council's published monitoring data indicates that over 90% of applications were approved from 2021/22 to 2023/24, and 89.65% were approved in 2024/25 ("Development Management Performance" report to Planning Committee 22-07-2025 (LD84)).

**6. The plan incorporates an assumed London Plan backlog of 1,721.4 homes to 2025/26. What is the evidence base for the assumed backlog of 1,721.4 and how does this relate to the subsequent updated backlog of 2,724.8 homes?**

- 6.1 The initial backlog (1,721.4 homes) was calculated in 2023, based on the available evidence in the housing trajectory at that time, to inform the housing target included in the draft Local Plan (Regulation 18 stage) (see paragraph 4.5 of SD14). It was calculated by taking the first seven years (2019/20 to 2025/26) of Camden's ten-year housing requirement in Table 4.1 of the London Plan 2021 (1,038 x 7) and subtracting both past delivery (2019/20 to 2021/22) and anticipated future delivery (2022/23 to 2025/26). Past completions in the housing trajectory are based on Housing Flows Reconciliation (HFR) returns (submitted annually by the GLA on behalf of London boroughs), and take account of both self-contained and non-self-contained homes.
- 6.2 To inform the preparation of the Proposed Submission Draft Local Plan the housing trajectory was reviewed and updated. This led to an increase in the anticipated backlog of 1,003.4 homes primarily due to delays in the delivery of existing permissions meaning that overall the backlog increased from 1,721.4 to 2,724.8 homes. The updated backlog of 2,724.8 homes was calculated by the same method, except that past delivery for 2022/23 to 2024/25 has replaced anticipated future delivery, and anticipated delivery for 2025/26 has been updated. Table M4.1 below sets out the backlog assessments from the 2023 and 2025 trajectories together for comparison.
- 6.3 The increase in the backlog is primarily associated with changing fire safety requirements under the Building Safety Act, which developers must demonstrate compliance with before construction progresses, and increasing costs of construction, which mean that approved schemes are taking longer to commence work, and as a result the gap between approval and delivery is widening. This is acknowledged in the joint note prepared by MHCLG and the Mayor of London 'Homes for London A package of support for housing building in the capital' (LD85) which states that "Housebuilding in the capital has faced significant challenges over recent years – including the impact of the Covid-19 pandemic, high interest rates, spiralling construction costs, regulatory blockers and wider economic conditions. As a result, more than a third of London boroughs recorded zero housebuilding starts in the first quarter of this year".

**Table M4.1 – Comparison on backlog calculations from late 2023 and late 2025**

Year	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	Total 2019/26	Backlog assessment
<b>London Plan target</b>	1,038	1,038	1,038	1,038	1,038	1,038	1,038	<b>7,266</b>	
<b>Completions (HFR)</b>	919.9	527.7	531.6	363.4	607.8	997.9			
<b>Future delivery assessment 2023 (completions in brackets)</b>	(921.5*)	(527.7)	(531.6)	368.0	1,066.2	1,023.9	1,105.8	<b>5,544.6<sup>+</sup></b>	7,266 minus 5,544.6  <b>= 1,721.4</b>
<b>Future delivery assessment 2025 (completions in brackets)</b>	(919.9)	(527.7)	(531.6)	(363.4)	(607.8)	(997.9)	592.8	<b>4,541.2<sup>+</sup></b>	7,266 minus 4,541.2  <b>= 2,724.8</b>

\* The 2023 assessment adopted a marginally different completions figure for 2019/20 due to a different count of the number of non-self-contained bedrooms converted to a C3 equivalent

+ Delivery figures have been rounded to a single decimal place for the purpose of this table, so the sum of the rounded figures may differ slightly from the total figure here which is taken from the relevant housing trajectory

- 7. The Plan assumes that only half of Euston capacity (875 homes) is delivered in the Plan period. What evidence supports the delivery of the 875 homes within this timeframe given noted delays?**
- 7.1 Announcements from the government and HS2 Limited over the last year confirm that construction of HS2 is continuing, and tunnelling from Old Oak Common to Euston commenced 27 January 2026 (see ND24 and ND25). While the opening stage from Old Oak Common to Birmingham Curzon Street is no longer expected to be operational by 2033, the government has indicated that a Euston Delivery Company will be established to oversee the development of the whole Euston campus, including the new HS2 station and the upgraded National Rail station, along with a significant level of development to support the Knowledge Quarter and delivery of new homes.
- 7.2 The Council published the Submission Draft of the updated Euston Area Plan for consultation in mid-January 2026. The Submission Draft includes 13 site allocations, 12 of which are expected to include housing as part of their development. Only half of the sites are directly involved in the construction of HS2 and associated National Rail works, and there is potential for some sites that are currently involved in the works to become available before the HS2 line is operational.
- 7.3 On the basis of pre-application discussions, engagement related to the Euston Area Plan, and discussions with colleagues in Camden's Community Investment Programme team, the Council considers that five allocated sites, that are not directly involved in HS2 works, have a reasonable prospect of being fully delivered prior to the end of the Local Plan period in 2041, providing 568 homes in total. Three are privately owned sites in the vicinity of Euston Road and Eversholt Street (EA2, EA3 and EA5) and collectively have the capacity to deliver 253 additional homes (as well as replacing existing homes). The remaining two are Council-owned sites in the area of Regent's Park Estate (EA10 and EA12) and collectively have identified capacity to deliver 315 additional homes (as well as replacing existing homes).
- 7.4 There are two other privately owned sites (EA4 and EA11) that are remote from the HS2 works, but given existing occupation they are not currently expected to become available in the short- to medium-term. If they were to become available within the Local Plan period, collectively they would have identified capacity for 185 additional homes (there are no existing homes).
- 7.5 In addition to these, there are three other sites that have a total identified capacity of 500 homes, which the Council considers are developable in part or in whole before April 2041:
- EA13 – this is adjacent to the railway at the Council's Ampthill Estate, and has potential for 120 additional homes. It is not directly involved in the HS2 works, but may not be fully deliverable within the Plan period due to proximity to Euston Station and partial National Rail ownership.

- EA6 – HS2 enabled development above tracks at Park Village East, for 350 additional homes.
- EA7 – part HS2 compound and part trackside development, for 30 additional homes.

7.6 In sum, there is potential for up 1,153 homes to be delivered before April 2041 on sites allocated within the Submission Draft Euston Area Plan, but 55% of these (685) relate to sites that are unlikely to be fully delivered during the Local Plan period.

7.7 If all of the homes identified in paragraph 7.3 (568) and half of the homes identified in paragraphs 7.4 and 7.5 ( $685 \div 2 = 342$ ) were delivered within the Local Plan period, a total contribution of 910 additional homes towards the Local Plan target would be delivered from sites allocated in the Submission Draft Euston Area Plan, a total broadly similar to the 875 homes assumed in the Local Plan.

## **8. Overall, are the assumptions about deliverability realistic and justified?**

8.1 The Council considers that the assumptions about deliverability informing the housing trajectory are realistic and justified.

8.2 The Local Plan contains 70 site allocations, and 62 of these seek on-site development of housing (other than traveller pitches). Of the 62 allocations seeking on-site housing, the trajectory anticipates that:

- a. 6 allocations will deliver housing in 2025/26 (with more recent evidence indicating that at least three of these may not complete until 2026/27);
- b. housing from 25 further allocations will be delivered in full during the first 5 years of the Plan period;
- c. housing from 6 further allocations will be delivered partly during the first 5 years of the Plan period, and delivered partly during years 6-15; and
- d. the remaining 25 allocations will deliver housing only during years 6-15 of the Plan period.

8.3 The Council is confident that the sites identified for housing supply in the first five years of the Plan period are suitable for housing, available and have a realistic prospect of delivery by 31 March 2031 (including the 31 allocated sites indicated in paragraphs 8.2b and 8.2c above, and the unallocated sites, non-major permissions and windfalls included for this period in the Camden Housing Land Supply table ED03s). As set out in response to question 5, with the exception of four sites, developments included in the five-year housing land supply now have planning permission, a resolution to grant subject to completion of S106, or a submitted planning application following positive pre-application discussions. The four sites in the five-year supply that are yet to be subject to a planning application are discussed in response to question 9 below. A fifth site shown in the housing land supply (ED03s) with the status "application awaited" is now subject to a submitted application, as indicated in response to question 2.

- 9. Several major sites are at pre-application stage but have nonetheless been included as deliverable (for example, St Pancras Hospital, Royal College Street, Regis Road). What evidence demonstrates deliverability in instances where a site does not have planning permission?**
- 9.1 As indicated in responses to questions above, the five-year housing land supply included in SD14 includes four development sites that are yet to be subject to a planning application. The four sites are discussed in turn below, together with the evidence that indicates that they are deliverable.
- 9.2 Site S7: 24-86 Royal College Street (including Parcelforce at 24-58 Royal College Street). The Parcelforce site was previously allocated in the Site Allocations Local Development Document 2013, but has taken many years to come forward due to the twin challenges of finding an alternative suitable site for the parcel distribution service, and identifying a prospective purchaser and purchase price able to fund the relocation. The Parcelforce site has been acquired by [Reef and Partners](#), who are currently delivering Site 22: 6 St Pancras Way (being marketed as Tribeca, phase 1 is complete while phases 2-3 are under construction). The representation made by Reef as part of the consultation on the Proposed Submission Plan confirms they are “actively” taking the site forward (Responder ID 501). A Planning Performance Agreement has been in place for the Parcelforce site since July 2025, an EIA scoping opinion has been sought and issued towards the end of 2025, and submission of a planning application is expected in spring 2026. The five-year housing land supply includes delivery of 100 homes at this site.
- 9.3 Site S8 St Pancras Hospital – this site was also previously allocated in the Site Allocations Local Development Document 2013. The NHS has now divided the site into two parts. In relation to the north-western section (approx. 0.8 ha), planning permission has been granted for replacement of the Moorfields Eye Hospital and the UCL Institute of Ophthalmology, and this development is approaching completion. The remainder of the site is subject to a partnership between the [North London NHS Foundation Trust and the King's Cross Group](#) (owner of the nearby King's Cross Central development, which delivered over 1,500 additional homes between 2012 and 2024). The remaining section of Site S8 has been subject to an ongoing sequence of pre-application discussions over the last two years focussing on individual plots. A Planning Performance Agreement was put into place at the end of 2024, and a new Agreement is currently being negotiated with a view to submission of a planning application during 2026. The representation made by the site promoter as part of the consultation on the Proposed Submission Plan confirms this (Responder ID 524) The five-year housing land supply includes delivery of 100 homes at this site.
- 9.4 Site C22: Heybridge Garages, Hadley Street. This site is one of three sites that are included in the five-year housing supply and fall within phase one of the Council's

small sites programme (part of the [Community Investment Programme](#)). A Planning Performance Agreement was put in place in mid-2024, and a series of pre-application discussions have taken place. Applications have been submitted for two phase one sites (Raglan St garages and Highgate Road/ Glenhurst Avenue, both unallocated sites), and are expected to be considered by Planning Committee in spring 2026. The Heybridge Garages site has been cleared, and an application for housing is due to be submitted early in 2026. The five-year housing land supply includes delivery of 10 homes at this site.

9.5 Site C16: Shirley House, 25-27 Camden Road. This site housed the British Transport Police head office from 2005 to 2024, but is now unoccupied. Significant upgrade and increased site coverage would be needed to achieve an EPC rating of B and the floorplates sought for contemporary offices. Pre-application discussions in relation to potential for retrofit for an alternative use commenced in mid-2025 and are continuing. The five-year housing land supply includes delivery of 197 student bedrooms at this site, which is assessed as equivalent to 78.8 self-contained homes under paragraph 4.1.9 of the London Plan 2021. The representation made by the site promoter as part of the consultation on the Proposed Submission Plan confirms that they “strongly support the overall aspirations of the site allocation and the principle of purpose built student accommodation on the site as an alternative to offices (Responder ID 628).

9.6 Site C2: Regis Road and Holmes Road Depot has an area of approximately 9 ha. The eastern parcel of this site (approximately 4 ha, including the UPS distribution depot) is not expected to be available in the short-term. However, two prospective developers (Yoo Capital and Joseph Homes) have each acquired interests in a group of sites which collectively cover the western parcel (approximately 5 ha). Both entered into Planning Performance Agreements with the Council's planning service in 2024 and have engaged in a series of pre-application discussions. A planning application was submitted for the Yoo Capital sites in autumn 2025, which also covers most of Site C4 (Kentish Town Police Station), and proposes development of a Camden Film Quarter including 485 additional homes (in addition to replacement housing). The first phase includes 240 additional homes. It is anticipated that Planning Committee will consider the application in spring 2026. The five-year housing land supply includes delivery of 130 homes at this site. A planning application for the Joseph Homes sites is also anticipated early in 2026. Both Yoo Capital and Joseph Homes made representations as part of the consultation on the Proposed Submission Plan, which confirm their aspirations for the site (see Responder ID 579 and 644 respectively).

**10. Does the evidence demonstrate that at least 10% of the housing requirement set out in the Plan would be delivered on smaller sites?**

10.1 Paragraph 73 of the NPPF expects plans to accommodate at least 10% of their housing requirements on small and medium sized sites no larger than one hectare.

Paragraph 6.6 of Housing Topic Paper (TP10) indicates that around 18% of the total housing delivery anticipated by the Local Plan will come forward on sites of 1 ha or less.

- 10.2 The calculation in TP10 relates to sites allocated in the Local Plan for the development of housing on-site (whether self-contained or non-self-contained). It omits sites where the Local Plan proposes a contribution to housing on an alternative site elsewhere, and omits the site allocated for traveller pitches rather than more conventional housing development. The capacities used are as given in the Submission Draft Local Plan, and the areas are as measured for the Proposals Map and provided in the Local Plan (except for Allocation C5: 369 – 377 Kentish Town Road, which measures 0.03 ha, but is given in the Local Plan as 0.3 ha).
- 10.3 The Local Plan contains 70 site allocations, and 62 of these seek the on-site development of housing (other than traveller pitches). The indicative capacity of these 62 sites totals 9,174, whilst the overall housing target provided by the Local Plan is 11,550.
- 10.4 Of the 62 sites allocated for on-site housing, 17 have areas greater than 1 ha and 45 have areas of no more than 1 ha. The 45 sites with areas of no more than 1 ha have a total indicative capacity equivalent to 2,104 homes, which represents 23% of the indicative capacity of all housing allocations, and 18% of the overall housing target (as indicated by TP10). The evidence therefore demonstrates that more than 10% of Local Plan housing requirement will be delivered on smaller sites.

## **11. What is the compelling evidence to show that windfall sites will provide a reliable source of supply as anticipated in the Plan?**

- 11.1 The Local Plan allocates sites that have capacity for major development (10 or more additional homes, or buildings of 1,000 sqm or more). Consequently, all sites coming forward that have fewer than 10 additional homes will be additional to those allocated in the Local Plan.
- 11.2 The Housing Trajectory and Five Year Housing Land Supply Note (SD14) explains, in paragraph 3.6, how the Council has estimated delivery from non-major sites at the start of the Local Plan period. This data was based on the non-major sites with planning permission on 31 March 2025 (including started and un-started developments, but excluding expired or completed permissions). The estimates assume that all of these would be built out within three years (by 31 March 2028), which is consistent with the standard condition specifying the time within which development should commence, and sufficient to accommodate the build programme for a development of this scale. It is acknowledged that some of these permissions may not actually be implemented, but they will be augmented by further permissions granted from 1 April 2025 to 31 March 2028. At the start of the Plan period (the two years from 1 April 2026 to 31 March 2028), the Council has assumed

that two-thirds of 31 March 2025 permissions will be delivered, or 215 additional homes.

- 11.3 As further indicated in paragraph 3.6 of SD14, for each year of the Plan period from 2028/29, the housing trajectory includes a 'windfall' figure equal to the average annual number of homes completed as part of non-major developments from April 2015 to March 2025. This amounts to 145 additional homes per year, or 1,885 additional homes in total from 2028/29 to 2040/41. This data is derived from the Planning London Datahub (which is a record of planning applications, starts and completions managed by the GLA for the whole of London), and is included in the Housing Topic Paper (TP10) at Appendix 1 (first purple column).
- 11.4 A similar windfall calculation was provided for the examination of the Camden Local Plan 2017, based on completions of non-major housing development over the ten years from April 2005 to March 2015. Over these earlier 10 years, 1,854 homes were completed as part of non-major developments, an average of 185 homes per year.
- 11.5 Although some housing delivery does arise from sites that were not anticipated to come forward at the time of plan preparation, the Council has not included an element of supply from windfall sites of over 10 homes, as this is challenging to quantify in Camden.
- 12. Does the Plan provide appropriate contingency to ensure a sufficient pipeline supply of homes? What flexibility is there within the Plan should some of the housing allocations not come forward in line with expected timescales?**
- 12.1 The submitted Plan seeks to deliver a minimum of 11,550 additional homes over the Plan period to 2041. This is a capacity based target, based on the position at the time the draft Local Plan was prepared in 2023.
- 12.2 At the time of the calculation of the housing target, the anticipated delivery over the Plan period was 11,650 additional homes (from site allocations in the draft Plan, planning permissions and windfall), providing a margin or contingency of 100 homes above the target (see paragraph 4.8 of the Council's Housing Trajectory and Five Year Housing Land Supply Note (SD14)).
- 12.2 The Council now anticipate a greater level of delivery, with 12,819.9 additional homes forecast to be delivered over the Plan period (see paragraph 5.2 of SD14). The majority of this uplift can however be attributed to an increase of 1,003.4 in the initial backlog against the London Plan target (also set out in paragraph 6.2 above), due to delays in the delivery of existing permissions, rather than an increase in the supply of available sites. Therefore, after taking the backlog into account, the margin between the Local Plan target and anticipated delivery is now 255.5 homes, which remains comparable with the 216 home margin identified in the Camden Local Plan 2017.

- 12.3 The Council acknowledges that it is likely that some allocated sites may not come forward at the rate anticipated, and the responses to questions 4 and 5 above set out the challenges faced in Camden to bringing forward other sites more quickly. Furthermore, it should also be noted that the Council has taken a conservative approach to delivery from windfall sites, and has not included any delivery from windfall sites involving 10-or-more homes, as set out in response to question 11 above. Consequently, any additional delivery that does arise from unallocated sites will be available to overcome shortfalls in delivery from allocations.
- 12.4 Where unanticipated sites do come forward, Policy H1 prioritises provision of housing through parts B1, B5, and B6, and ensures that the target does not constrain housing supply by stating that "The Council will aim to deliver **at least** 11,550 additional homes from 2026/27 to 2040/41" [emphasis added]. The Council's management of pre-application discussions and planning performance agreements aims to minimise the number of planning applications that are refused, and the Council's published monitoring data suggests that the approach is successful, with over 90% of applications were approved from 2021/22 to 2023/24, and 89.65% were approved in 2024/25 ("Development Management Performance" report to Planning Committee 22-07-2025 (LD84)).
- 12.5 The Council also notes that where the financial environment creates viability challenges to housing coming forward as quickly as anticipated, the Local Plan's housing policies (including areas of flexibility) enable the Council to work with developers to bring schemes forward. For example:
- Policy H2 seeks to ensure that housing comes forward in tandem with non-residential development, enables consideration of the scale and nature of the housing to take account of viability, and enables affordable housing to be prioritised where the overall quantum of housing is constrained;
  - Policy H4 also enables viability to be taken into account, so that housing development can potentially come forward with a lower proportion of affordable housing rather than failing to come forward at all;
  - Policy H6 enables viability to be taken into account in determining a suitable mix of dwelling sizes, giving flexibility to vary the mix in accordance with market and financial conditions;
  - Policies H6 and H9 support a variety of housing types, including build to rent development and student accommodation (particularly on sites of 0.5 ha or greater), which could assist delivery when building homes for sale faces viability challenges.
- 13. Does the evidence demonstrate that the Plan, taken together with completions, commitments and allocations in the existing development plan for the area and windfall allowance will provide a supply of specific, developable or broad**

**locations for growth for years 6-10 and wherever possible years 11-15 of the plan period?**

- 13.1 The Council is confident that the sites identified for housing supply from years 6-15 of the Plan period are suitable for housing, and have a good prospect of becoming available and viable for development when delivery is anticipated by the trajectory.
- 13.2 The sources used to identify and select sites for allocation in the Local Plan are set out in the Site Selection and Allocation Topic Paper (TP03). These included reviews of:
- five Call for Sites exercises carried out from 2018 to 2024;
  - sites identified by existing and emerging plans, such as the Camden Site Allocations Local Development Document 2013 (LD02), the Fitzrovia Area Action Plan 2014 (LD03) and the Neighbourhood Plans for parts of the borough (LD09-LD15);
  - sites identified in the London Strategic Housing Land Availability Assessment 2017, which informed the London Plan 2021;
  - planning applications.
- 13.3 Following the selection process, the Local Plan contains 70 site allocations, and 62 of these seek on-site development of housing (other than traveller pitches). Of the 62 allocations seeking on-site housing, the housing trajectory anticipates that 31 allocations will deliver housing after 31 March 2031 as follows:
- housing from 6 allocations will be delivered partly during the first 5 years of the Plan period, and delivered partly during years 6-15; and
  - the remaining 25 allocations will deliver housing only during years 6-15 of the Plan period.
- 13.4 The sites in the housing trajectory for years 6-15 of the Plan period have been scheduled for specific years on the basis of relevant evidence from:
- the submission forms provided in association with successive Call for Sites exercises and Local Plan consultations, which sought details of likely availability and delivery dates;
  - pre-application discussions related to proposals for longer-term or phased development;
  - planning application documents for phased development, notably development programmes for the later phases included in Construction Management Plans;
  - the extent and nature of existing buildings, operations and occupiers present on each site; and
  - regular discussions the Council's development management team and officers managing the Community Investment Programme.
- 13.4 The approach to windfalls taken in the Local Plan and housing trajectory is set out in SD14 and the response to question 11 above. For years 6-15 of the Plan period, the housing trajectory includes a 'windfall' figure of 1,450 additional homes (145 homes

per year), which is equal to the average annual number of homes completed as part of non-major developments from April 2015 to March 2025, and based on data collated by the GLA through the Planning London Datahub. The Council has taken a conservative approach to delivery from windfall sites, and has not included any delivery from windfall sites involving 10-or-more homes.

**14. Based on the housing trajectory, how many dwellings are expected to be delivered in the first 5 years following adoption of the Local Plan? How many dwellings would come forward from each source of supply?**

- 14.1 As indicated in the Housing Trajectory and Five Year Housing Land Supply Note SD14, we anticipate that there will be a supply of 4,733.33 homes from 1 April 2026 to 31 March 2031. Further detail of the sites expected to deliver housing is included in the Camden Housing Land Supply table (ED03s).
- 14.2 Within this total, 650 homes represent the anticipated supply from non-major development of self-contained homes (schemes involving fewer than 10 homes), which comprise permissions delivering in 2026/27 and 2027/28 (215 homes), and windfalls based on past completion rates for 2028/29 to 2030/31 (435 homes). The remaining supply of 4,083.33 homes is anticipated from identified sites in the form of 3,442 self-contained homes from major developments, and bedrooms in non-self-contained (communal) accommodation equivalent to 641.33 homes.
- 14.3 Of the 3,442 self-contained homes expected to be delivered from major developments, 3,244 homes are anticipated to be delivered on sites allocated in the submitted Plan (including those with planning permission) and 198 homes are anticipated to be delivered on unallocated sites with planning permission.
- 14.4 Of the 641.33 homes (equivalent) expected to be delivered from non-self-contained accommodation, 356.4 homes (equivalent) are anticipated to be delivered on sites allocated in the submitted Plan (including those with planning permission) and 284.93 homes (equivalent) are anticipated to be delivered on unallocated sites with planning permission.
- 14.5 In terms of sub-areas, the anticipated supply of 4,083.33 homes from identified sites breaks down as follows:
- the anticipated supply in the south sub-area is 1,121.4 homes (of which 977 are self-contained);
  - the anticipated supply in the central sub-area is 1,832.51 homes (of which 1,465 are self-contained);
  - the anticipated supply in the west sub-area is 1,084.2 homes (of which 967 are self-contained); and
  - the anticipated supply in the north sub-area is 45.22 homes (of which 33 are self-contained).

14.6 In terms of planning status, at the time of writing, the anticipated supply from identified sites breaks down as follows:

- the anticipated supply from developments under construction is 1,000.49 homes;
- the anticipated supply from developments where works have commenced but homes are not currently under construction is 1,019.2 homes;
- the anticipated supply from other developments with planning permission (or prior approval under the General Permitted Development Order) is 550.04 homes;
- the anticipated supply from developments with a resolution to grant permission subject to completion of a S106 planning obligation is 693 homes;
- the anticipated supply from developments where a planning application has been submitted following pre-application discussions but has yet to be determined is 531.8 homes; and
- the anticipated supply from the four sites that are yet to be subject to a planning application is 288.8 homes - these sites are discussed in detail in response to question 9 above.

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

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

15.2 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.

15.3 The Council will monitor housing delivery as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of new homes to meet identified needs, the Council will consider whether any policy adjustments or an early review is appropriate.

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

16.1 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.

16.2 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.

16.3 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.