

Camden Local Plan Proposed Submission Draft 2025

Housing Topic Paper

October 2025

1 Introduction

- 1.1 The Council is reviewing the Camden Local Plan 2017, which provides the current basis for the Council's planning decisions and sets the framework for future development in the borough. The review will ensure that Camden continues to have robust and up-to-date planning policies that align with Council priorities.
- 1.2 This topic paper supports Policy H1 Maximising Housing Supply and seeks to provide an overview of:
- Past housing delivery in Camden;
 - How we have set the housing requirement for Camden in the Local Plan;
 - The process we have undertaken to identify sites for allocation in the Local Plan; and
 - Future housing supply.
- 1.3 The purpose of this topic paper is to provide additional information to the Planning Inspector to evidence and justify the Council's proposed approach to maximising housing supply in Camden and to demonstrate that the approach we have taken positively prepared, justified, effective, and consistent with national and regional policy.

2 Policy Context

National Context

National Planning Policy Framework 2024

- 2.1 Section 5 of the NPPF is entitled Delivering a sufficient supply of homes. Paragraph 61 establishes the objective of: "*significantly boosting the supply of homes*" and states that:
- "it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."
- 2.2 Paragraph 61 goes on to state that:
- "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."
- 2.4 Further to this, paragraph 69 of the NPPF states that:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”

- 2.5 Under the NPPF sub-section titled ‘Identifying land for homes’ paragraph 72 states 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. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for five years following the intended date of adoption³⁴; and

b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”

- 2.6 Paragraph 73 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area. As such, local planning authorities should identify through their development plan and brownfield registers land to accommodate at least 10% of their housing requirements on sites no larger than one hectare. They should also support the development of windfall sites through policies and decisions.

- 2.7 With regards to windfall sites, paragraph 75 states:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”

- 2.8 Under the sub-section titled Maintaining supply and delivery, paragraph 78 states that:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or

c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework , and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.”

2.9 Section 11 of the NPPF entitled ‘Making effective use of land’ states that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.” (paragraph 124)

2.10 Paragraph 125 sets out what planning policies and decisions should do to make effective use of land. Paragraph 126 states that local planning authorities should take a proactive role to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them.

2.11 Under the sub-section entitled Achieving appropriate densities, paragraph 130(a) 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. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate”.

National Planning Practice Guidance

2.12 The following planning practice guidance is relevant to this topic paper:

- [Housing and economic land availability assessment](#);
- [Housing and economic needs assessment](#);
- [Housing supply and delivery](#); and
- [Housing Delivery Test measurement rule book](#).

Regional

London Plan 2021

2.13 London Plan Policy H1 Increasing housing supply states:

“A Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.

B To ensure that ten-year housing targets are achieved, boroughs should:

1) prepare delivery-focused Development Plans which:

a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification

b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2

c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary

b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets

c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses

d) the redevelopment of surplus utilities and public sector owned sites

e) small sites (see Policy H2 Small sites)

f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.

3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.”

- 2.14 Table 4.1 of the London Plan sets out the 10 year targets for net housing completions from 2019/20 – 2028/29. Camden’s ten year housing target is 10,380 additional homes.
- 2.15 The housing target set for Camden in the London Plan is based on the Strategic Housing Land Availability Assessment (SHLAA) 2017. Further information on the SHLAA is set out in paragraphs 4.1.7 and 4.1.8 of the London Plan.
- 2.16 Paragraph 4.1.11 of the London Plan goes on to state:
- “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.”

Small Sites

- 2.17 London Plan Policy H2 Small Sites states that:
- “A Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:
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- 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.
- B Boroughs should:
- 1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
- 3) identify and allocate appropriate small sites for residential development”
- 2.18 Table 4.2 of the London Plan sets out the ten year targets (2019/20 to 2028/29) for net housing completions on small sites (below 0.25 hectares in size). Camden’s ten year housing target is 3,280. The small sites targets in Table 4.2 are also informed by the Strategic Housing Land Availability Assessment (SHLAA) 2017.

Optimising site capacity

- 2.19 London Plan Policy D3 sets out the approach to optimising site capacity through the design-led approach.

2.20 Part A of the Policy states:

“All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.”

2.21 To support Policy D3 and provide further details on how it should be applied the GLA have also prepared guidance entitled ‘Optimising Site Capacity: A Design-led Approach’, which was adopted in June 2023.

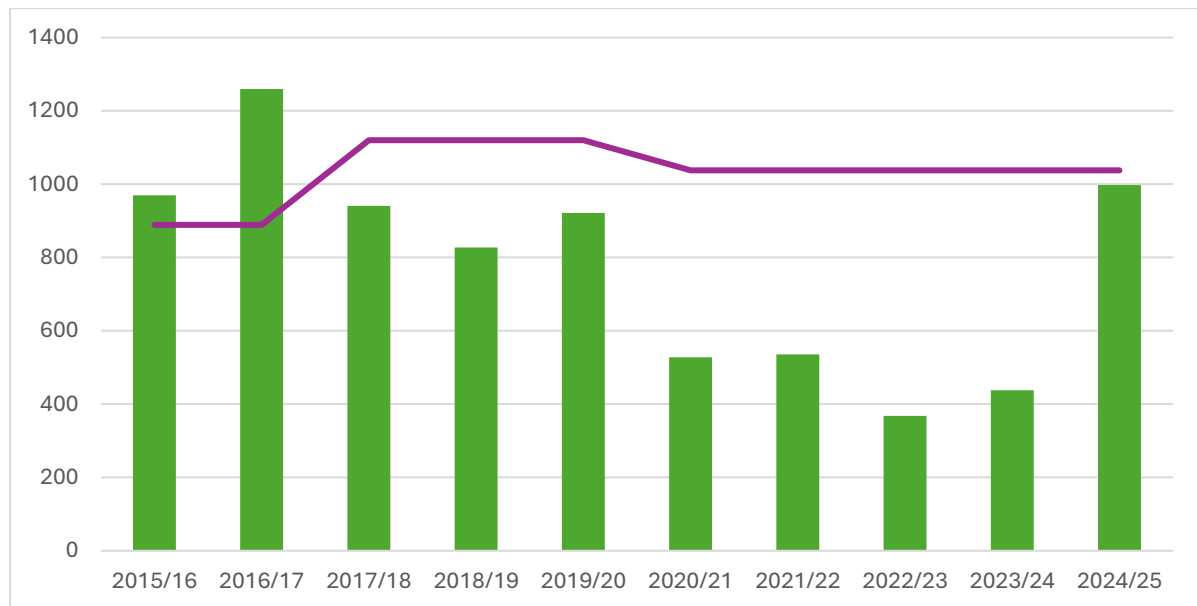
3 Past Delivery of Housing in Camden

3.1 The adopted Camden Local Plan 2017 sets a target to deliver 16,800 additional homes in Camden from 2016/17 to 2030/31. This equates to an annual target of 1,120 homes.

3.2 This target was superseded by the adoption of the London Plan in 2021, which sets a target to deliver 10,380 additional homes in Camden over a ten year period from 2018/19 to 2028/29. This is equivalent to 1,038 homes per annum.

3.3 Housing delivery in Camden has not met or exceeded the housing target since 2016/17, although Camden achieved 96% delivery against the target in 2024/25. Instead, over the last ten years Camden has delivered on average 779 additional homes per year (see Figure 1). As a result, Camden’s current measurement in the housing delivery test is 53%, which means that the Council has to produce an Action Plan and apply the presumption in favour of sustainable development.

Figure 1 - Housing Completions 2015/16 – 2024/25



3.4 A number of factors have influenced housing delivery in Camden over this period including:

- Investors targeting life science, student housing and hotels, which have high returns on investment;
- Developers having little interest in building homes, even though it is the use with the greatest need;
- Camden's character as an inner London borough, with limited availability of land and no greenfield development sites;
- High existing use values and build costs, relative to sales values;
- Uncertainty and delays at Euston, linked to the delivery of HS2; and
- Registered providers scaling back their new build programs due to focus on improving existing stock.

3.5 In addition, many of the sites in the Local Plan 2017 Housing Trajectory have taken significantly longer than envisaged to come forward due to the Covid-19 Pandemic, Brexit, labour shortages, build costs, changes in regulations (for example, the introduction of second staircases), on-site constraints and complex landownerships.

3.6 There are several large sites in the Local Plan 2017 Housing Trajectory which were anticipated to be complete by 2025/26, but are yet to deliver any housing. These include 24-58 Royal College Street (Parcelforce) (Site Allocation Policy S7), St Pancras Hospital (Site Allocation Policy S8), and the O2 Car Park (Site Allocation Policy W2) (all allocated in 2013). These effectively form part of our backlog against the target set by the London Plan 2021.

4 Housing Requirement

- 4.1 The London Plan 2021 sets a housing target for Camden of 10,380 additional homes over a ten year period from 2018/19 to 2028/29, which equates to a need to deliver a minimum of 1,038 homes per year. This includes 3,280 homes from small sites.
- 4.2 As the new Camden Local Plan period continues for a further twelve years beyond 2028/29, a housing requirement has been set for the whole Plan period having regard to paragraph 4.1.11 of the London Plan (see paragraph 2.16 above).
- 4.3 The London SHLAA 2017 identified the amount of housing that could be brought forward over the timescale of the London Plan 2021. The SHLAA assessed potential capacity from large sites (over 0.25ha); small sites (under 0.25ha); and non-self-contained accommodation (including student accommodation; specialist housing for older people in Use Class C2; hostel accommodation; and shared living schemes/large scale HMOs in Sui Generis use).
- 4.4 Table 10.1 of Appendix A of the SHLAA identified the following notional large site capacity in Camden over the period from 2017 to 2041:
- Phase 1 (2017 – 2019) – 2,098
 - Phase 2 (2019 – 2024) – 4,770
 - Phase 3 (2024 – 2029) – 2,466
 - Phase 4 (2029 – 2034) – 4,168
 - Phase 5 (2034 – 2041) – 1,785
- 4.5 Table 10.2 breaks down large site capacity in each local planning authority by status for all phases from 2017 to 2041. For Camden this comprises:
- Approvals (sites with planning permission) – 4,190
 - Allocations (sites allocated for residential use in a development plan) – 4,381
 - Potential Development (sites which are considered to have some potential for housing or mixed use development) – 5,027
 - Low Probability Site (sites which are considered to have a low probability of coming forward for development before 2041) – 1,689
- 4.6 It should, however, be noted that paragraphs 4.37 and 4.38 of the SHLAA state –
- “4.37 Given London’s dynamic land market, capacity findings for phase four and particularly phase five does not in all boroughs provide a true picture of the housing that could potentially come forward during that period as over this much longer-term period it becomes very challenging to predict what sites will become suitable or available for housing. However, the later phases can still

provide an understanding of some of the capacity that may be available in the future and can help boroughs identify their land supply for years 10-15.

4.38 For a number of local planning authorities the majority of identified capacity is within phases one to three - see Figure 4.14. However, there are significant variations to this trend across London, with a number of authorities having the majority of the housing capacity phased from phase three onwards. This is particularly the case in locations where significant levels of housing development is dependent on the delivery of new infrastructure – for example: Old Oak & Park Royal Development Corporation (High Speed 2, Crossrail 1), Southwark (Old Kent Road), Camden (Euston AAP and High Speed 2). Similarly, high levels of capacity in authorities like Greenwich, Barking & Dagenham and Newham are identified in phase four and five and this reflects the time needed to either build out large approvals and effectively plan large-scale mixed use development.”

- 4.7 Camden’s site capacity assessment for phases 4 and 5 of the SHLAA (from 2029 – 2041) predominantly comprises development at Euston (including Euston Station, Euston Cutting and the Regents Park Estate), in addition to potential development sites and low probability sites. In setting the housing requirement for Camden in the new Local Plan, the Council has reviewed the approvals, allocations and potential development sites identified through the SHLAA and taken forward sites as site allocations in the Local Plan where they are considered to be suitable, available and achievable. The low probability sites have not been reviewed in detail however as these are still considered to have little prospect of being delivered, as they comprise high value retail, CAZ offices, social housing and social infrastructure, in addition to sites with ownership issues.
- 4.8 The Council has also carried out its own Housing and Economic Land Availability Assessment to identify further sites for allocation in the Local Plan. Information on the site identification process is set out in Section 5 below and in the [Site Selection and Allocation Topic Paper](#).
- 4.9 The Submission Draft Camden Local Plan includes a target to deliver at least 11,550 additional homes over the plan period 2026/27 to 2040/41. This assumes that the current London Plan 2021 target for Camden will continue to apply from 1 April 2026 to 31 March 2029 (3,114 homes in total or 1,038 additional homes per year), and that a target of 8,436 homes in total (703 additional homes per year) will apply thereafter.
- 4.10 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). The term 'windfall' describes development which is anticipated to arise on the basis of evidence

of past housing delivery, but where specific development sites have not been identified.

- 4.11 The target also reflects the delay associated with HS2 and development at Euston, assuming delivery within the Local Plan period of 875 homes from sites encompassed by the Euston Area Plan (in addition to delivery from existing permissions). Here, the Council currently anticipates that 1,750 homes will be delivered within the boundary of the Euston Area Plan in addition to existing permissions, but only half will be delivered within the Local Plan period. This compares with the target of 1,500 to 2,500 additional homes in the draft update of the Euston Area Plan published for consultation in January 2023.
- 4.12 The target also encompasses the cumulative backlog from under-delivery of completed homes from 2019/20 (the first year of the London Plan period) to 2025/26¹. This is estimated to be 2,725 homes. The Council has not sought to make-up the entire backlog in the early part of the Plan period by increasing the targets for the first five years, nor have we added a buffer² to the first five years, since the housing trajectory and five-year housing land supply indicate that the additional early delivery simply would not be achieved.
- 4.13 Further information on the Local Plan housing target is set out in our [Housing Trajectory and Five Year Supply Note](#).
- 4.14 The Council acknowledges that the London Plan is currently being reviewed and will result in a new capacity-based housing target for Camden. Once any new London Plan housing target for Camden is published in its final form, this will supersede the housing target in the new Camden Local Plan. The GLA are aiming to publish the new London Plan in its final form in 2027/28 (following examination in public). Consequently, the housing target included in the new Camden Local Plan may only apply for a short period of time.

¹ The GLA have advised that the backlog should be assessed in terms of under-delivery against the London Plan 2021 housing target for Camden commencing from the start of London Plan period in 2019 rather than the date on which the finalised London Plan 2021 was formally published (i.e. adopted).

² The NPPF 2024 indicates that the housing trajectory should add a buffer to the target for the first five years of the Plan period in the form of an additional supply of specific deliverable sites (moved forward from later in the Plan period). This buffer should either be 5% (where delivery in previous years has met targets) or 20% (where there has been significant under-delivery in previous years).

5 Site Assessment and Capacity

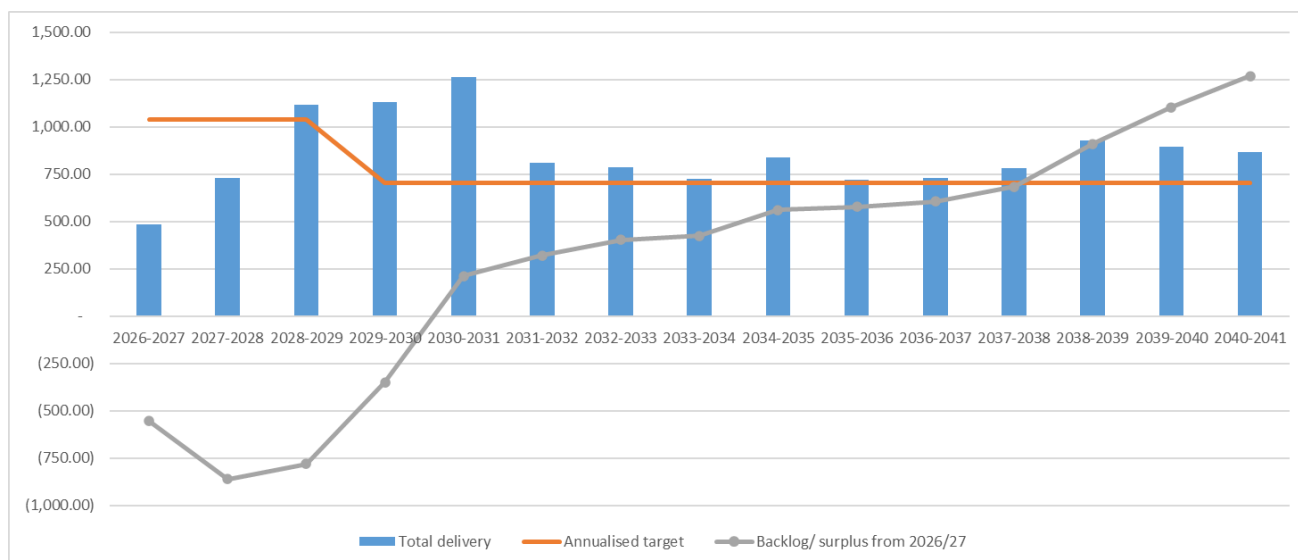
- 5.1 To inform the preparation of the Local Plan the Council undertook a Housing and Economic Land Availability Assessment. This identified sites from a number of different sources including:
- Call for sites – Four calls for sites were held - in Winter 2018, Spring 2020, Winter 2021/2022 and Winter 2022/2023. Sites were also submitted for consideration as part of the consultation on the draft Local Plan in 2024 and Proposed Submission Draft Local Plan in 2025. 65 sites were submitted for consideration through this process. Of these, 27 sites are allocated in the Draft Local Plan, and 16 were duplicate sites that had already been considered through the SHLAA process (and many of which were allocated in the Plan). The remaining 11 sites were ruled out as either not available; having limited development potential or no residential proposed; or because there was insufficient evidence to demonstrate suitability or deliverability.
 - Review of existing (including Camden's Site Allocations Plan 2013, Fitzrovia Area Action Plan and Neighbourhood Plans);
 - Review of the London Strategic Housing Land Availability Assessment 2017; and
 - Planning applications.
- 5.2 Sites were subject to a staged process, which involved:
- Stage 1 – Site eligibility check
 - Stage 2 - Basic site suitability and high level availability check
 - Stage 3 - Detailed site suitability and sustainability check
 - Stage 4 - Achievability check.
- 5.3 More detail on the work undertaken to identify sites and assess their development potential and determine their suitability for allocation in the Plan is set out in the Council's [Site Selection and Allocation Topic Paper](#).
- 5.4 Where sites are identified in the Plan as being suitable for housing, then indicative housing capacities have been identified. Housing capacities have been identified based on adopted area frameworks, Neighbourhood Plans, existing planning permissions and site capacity design work, which has been undertaken in line with London Plan guidance and tested policy compliant mixes.
- 5.5 Where site capacity design work has been undertaken a number of development scenarios have been modelled depending on the site context and constraints. Further detail on the site capacity work undertaken to inform the Local Plan is set out in the Council's [Site Selection and Allocation Topic Paper](#).

- 5.6 As set out in paragraph 1.40 of the Local Plan: “A larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours. A lower number may be supported where this can be justified, having regard to the overall supply of housing in the borough compared with housing needs and demonstrable needs for other land uses.” Further detail on the site capacity work undertaken to inform the Local Plan is set out in the Council’s [Site Selection and Allocation Topic Paper](#).

6 Future Supply

- 6.1 The Council plans to meet the housing target in the Local Plan through existing permissions for committed schemes, site allocations and windfall development.
- 6.2 To this end, the Plan includes 70 site allocations, the majority of which are allocated to deliver new homes in addition to other uses. Site allocations are also identified in the updated draft Euston Area Plan to deliver development at Euston and these will also contribute towards meeting the borough’s housing target.
- 6.3 Figure 2 below shows how sites are expected to come forward to meet the housing target proposed by the Submission Draft Camden Local Plan. It includes all self-contained and non-self-contained homes and covers the fifteen years of the Local Plan period - starting with 2026/27 and concluding with 2040/41. Further information on this is set out in the [Housing Trajectory and 5 Year Supply Note](#).

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



6.4 The housing trajectory shows that slightly over 12,800 additional homes are anticipated to be delivered over the Plan period from 1 April 2026 to 31 March 2041. It should, however, be noted that the surplus shown for 2040/41 makes up for the increased backlog at the start of the trajectory and the reduced delivery from smaller developments, rather than allowing for a significantly higher Local Plan target. Overall, the trajectory confirms that we anticipate the proposed housing target will be exceeded by the end of the Plan period³.

6.5 Of the 12,819 additional homes anticipated to be delivered over the Plan period, it is estimated that 9,640 will be delivered on sites allocated in the Plan and 875 homes will be delivered on sites allocated through the Euston Area Plan. With the remaining homes to be delivered on sites with planning permission, which are not allocated in the Plan, and on windfall sites.

6.6 As mentioned above, the NPPF requires Local Plans to accommodate at least 10% of their housing requirement on sites of one hectare or less. It is anticipated that around 18% of the Local Plan housing requirement will be met on allocated sites of one hectare or less. Furthermore, in accordance with the London Plan, the Local Plan also allocates a number of sites of 0.25 hectares or less.

6.7 Whilst the housing trajectory does not differentiate between sites based on site size in terms of hectares, it does include an allowance for smaller developments (non-major developments). For the years 2026/27 and

³ After taking account of the increase of 1,003.4 in the starting London Plan backlog, the cumulative delivery anticipated is 11,816.5 additional homes, rather than the 11,650 additional homes anticipated in late 2023 when the Local Plan target of 11,550 was set.

2027/28, this is based on the pipeline supply of permitted non-major developments. For each year of the Plan period from 2028/29, the housing trajectory includes a 'windfall' figure of 145 homes per year, equal to the average annual number of homes completed as part of non-major developments from April 2015 to March 2025. This equates to an overall anticipated delivery of 2,100 additional homes over the Plan period. Further information on the calculation of the windfall allowance is set out in Appendix 1.

- 6.8 The Council's [housing trajectory and five year supply note](#) prepared to support Local Plan sets out Camden's five year housing land supply position. Accounting for past under delivery against the housing target (the backlog) and a 20% buffer, Camden has a sufficient deliverable housing land supply to meet the proposed target for 2.8 years.
- 6.9 Although the Council cannot demonstrate a five year housing land supply through the Local Plan from the date of adoption, it has taken all reasonable steps to identify as much land for housing as possible in the Local Plan, as evidenced in the [Site Selection and Allocation Topic Paper](#). Camden is a highly built-up borough, with only previously developed sites and limited land available to deliver new development. All suitable and available sites have been identified and allocated in the Local Plan. This is supported by the fact that despite holding a number of calls for sites/consultations, only 65 sites have been put forward by site promoters since 2018 and, of these, only 27 were considered to be suitable for allocation.
- 6.10 Alongside the publication of the Submission Draft Plan, in May 2025 the Council wrote to all London boroughs under the duty to co-operate to ask whether they would be in a position to assist Camden in identifying a five year housing land supply of deliverable sites at examination (with the first five years of the Plan period being from 2026/27 to 2030/31). Sixteen boroughs responded and all confirmed that they are not in a position to assist. Furthermore, 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.
- 6.11 When allocating sites for development in the Plan, there is a need, in accordance with national and London-wide policy, to balance the delivery of housing with the need to support economic growth. Given this, the Plan predominantly allocates sites for mixed use development, taking into account the nature and location of each site. This reflects Camden's important economic role at a London, national and international level, being both part of London's Central Activities Zone (CAZ) and home to the internationally significant Knowledge Quarter innovation district, the importance of which is recognised in the Mayor's London Growth Plan. The need to plan for

London's economic growth means that available sites in the south of the borough need to provide for other uses in addition to housing.

- 6.12 Policy DS1 Delivering healthy and sustainable development is clear that the Council will ensure that developments optimise the use of land and make best use of a site and will resist development that makes inefficient use of Camden's limited land. This approach has informed the indicative housing capacities that have been set for the site allocations, while also taking into account other policy considerations. Further information on the approach taken to setting site capacities is provided in Section 6 of this report and in the Site Selection Topic Paper.
- 6.13 The Council also commissioned a [Building Heights Study](#) to identify locations in Camden where tall buildings may be an appropriate form of development, in line with the approach set out in the London Plan 2021 and planning guidance. 18 sites are identified in the Plan as being locations where tall buildings may be an appropriate form of development (see Local Plan Figure 22). Further guidance on the appropriate building height ranges for specific sites is then set out in the relevant site allocation policies.
- 6.14 It is also important to note that the character of the borough, in terms of heritage, affects the ability to deliver higher levels of development in many locations. Camden has over 5,600 listed buildings, 40 Conservation Areas, 14 Registered Parks and Gardens, and 53 protected squares, substantial expanses of protected Metropolitan Open Land (for example, Hampstead Heath) and is crossed by a number of strategic viewing corridors.
- 6.15 Although the availability of land to support housing delivery in Camden is highly constrained, the Local Plan adopts a number of proactive measures to support and promote the delivery of housing, as outlined below:
- Policy H1 (Maximising Housing Supply) states that the Council's regards permanent self-contained housing as the priority land use in the Plan, whilst also supporting other forms of permanent housing to meet more specific needs.
 - Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) requires 50% of the additional floor area in proposed non-residential developments to be provided as self-contained housing in the defined South Camden sub-area and the town centres of Camden Town and Finchley Road / Swiss Cottage.
 - Policy H6 (Housing choice and mix) states that the Council will aim to minimise social polarisation and create mixed, inclusive, sustainable and multi-generational communities by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs.
 - Policy IE2 (Offices) states that housing is the preferred use where it can be demonstrated an office use is no longer viable.

- Policy SC3 (Social and Community Infrastructure) states that affordable housing is the preferred use where it can be demonstrated a social or community facility is no longer required or viable.
- 6.16 In addition, the Council itself takes a pro-active approach to housing delivery, and has its own ambitious programme of investment to deliver new homes in the borough - the [Community Investment Programme](#). To date this has delivered 1,700 new homes, of which 70% are affordable.

7 Conclusion

- 7.1 This topic paper provides an overview of the work undertaken by the Council to inform the housing target set in the Local Plan Proposed Submission Draft and sets out how the Council intends to meet the target.
- 7.2 Although the Council has striven to maximise housing delivery, 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.
- 7.3 Whilst it cannot demonstrate a five year housing land supply through the Local Plan from the date of adoption, the Council proposes to meet the housing target set by the Local Plan over the Plan period. 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.
- 7.4 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.

Appendix 1 - Calculation of Windfall Allowance

Year	Total units completed	Total schemes >=10 units	Total schemes <10 units	% schemes <10 units	Self Contained schemes<10 units	Non Self Contained schemes <10 units	Self Contained schemes >=10 units	Non Self Contained schemes >=10 units
2015/16	698.1	456.2	241.9	35%	248.0	-6.1	237.0	219.2
2016/17	1425.9	1182.7	243.2	17%	256.0	-12.8	948.0	234.7
2017/18	829.3	734.2	95.1	11%	94.0	1.1	862.0	-127.8
2018/19	854.1	656.6	197.6	23%	207.0	-9.4	606.0	50.6
2019/20	1218.8	1083.3	135.5	11%	146.0	-10.5	886.0	197.3
2020/21	523.7	335.6	188.2	36%	184.0	4.2	321.0	14.6
2021/22	530.6	396.0	134.6	25%	139.0	-4.4	396.0	0.0
2022/23	363.6	294.0	69.6	19%	64.0	5.6	294.0	0.0
2023/24	607.8	584.0	23.8	4%	27.0	-3.2	584.0	0.0
2024/25	997.9	907.0	90.9	9%	87.0	3.9	907.0	0.0
Average (overall)	805.0	662.9	142.0	18%	145.2	-3.2	604.1	58.8
Average (since 2020/21)	604.7	503.3	101.4	17%	100.2	1.2	500.4	2.9