

Neil Cleary
Affordable Housing Development Co-ordinator
Planning Department
Camden Council
Town Hall
Judd Street
London WC1

By Fax and Post

4th April 2016

Dear Neil Cleary,

Proposed Amendments to Camden Housing Planning Guidance - Housing (CENV/2016/08)

I am writing on behalf of the Covent Garden Community Association. We strongly oppose the proposed changes to paragraphs 2.102 and additional paragraph 2.120A within Camden's Housing Guidance document.

This is because:

1. There is no dispute that there is a very serious lack of 'affordable' housing in Camden and London as a whole. Any new or amendment to existing housing policies should be aim to increase the possibility of procuring affordable housing; there is a particular need to provide new affordable housing south of the Euston Road where the residential community is under enormous commercial pressure and where the erosion of general needs housing is most severe, especially in the context of the Government's proposed Housing Bill.
2. Both Camden's Plan and The Mayor's London Plan have planning policies that make clear that mixed communities and more affordable housing should be provided within Camden south of the Euston Road (the Central Area). To promote policies that undermine this overriding aim is counter-productive.
3. The Council will seriously undermine its negotiating position of getting affordable housing included in commercial developments south of the Euston Road, if developers can cite the possibility of using payment-in-lieu anywhere within the Borough. The current policies, *if rigorously applied*, clearly help to concentrate developer's minds, as they know that unless they either provide the affordable housing that is required within the development, or by way of payment-in-lieu but on sites near by or at least within the area south of the Euston Road then their development proposals might not be granted planning approval. To introduce the option of payment-in-lieu that can be used anywhere within the borough will always be the easiest option for the developer and they will orchestrate their negotiations accordingly. In addition by having this opt-out, it will be much harder for the Council to win on appeal when endeavouring to get developers to include affordable housing as part of a specific development.

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4. The proposed change is a complete abrogation of the Council's stated Planning Policies that make clear that one of the key planning policies is to ensure that general needs housing is built south of the Euston Rd and to protect and enhance the local residential communities. If the change is adopted the Council will in effect be saying and agreeing to the fact that south of the Euston Rd is a commercial area and will be only available to those living in private housing and high rent commercial development. This is a reversal of the Council's current planning policies and will in practice assist the current Government's housing policies of pricing out low income residents from Central London.
5. No evidence has been produced as to why this policy change is being proposed; the report merely says that *"the Council may not always be able to spend affordable housing funds in close proximity of the development that generated the payment"*. The CGCA has a long and consistent record of identifying possible sites where affordable housing could be located, as have many other community groups south of the Euston Road, and indeed the Council has only recently adopted a detailed Action Area Plan for the Fitzrovia Area that specifically highlights sites where affordable housing should be provided. It is not tenable for the Council to then claim that no sites south of the Euston Road can be identified. Such a statement says more about the lack of determination by the Council to pursue their policies and lack of any rigour when negotiating with developers. There are a number of sites, not least the site in Cleveland Street where the Council have legal rights to acquire from UCLH the land for £1 and build affordable housing. This site is large enough to accommodate over 70 general needs dwellings. Indeed affordable housing should have been built on this site by 2005, but it continues to remain derelict. What better site does Camden want south of the Euston Road where they could deploy payment-in-lieu south of the Euston Road ?
6. We suggest there should be rewording of the proposed amendment to the effect that the Council 'will always press for onsite affordable housing in the central area and any funds in lieu shall take account of land values on the central area so they may be used to create affordable housing in the central area'.
7. This fundamental change is being done in a wholly undemocratic manner. The proposal arose from officers at the behest of developers, and has not been subject to any serious or formal scrutiny. It has now been presented to one Councillor for approval, Phil Jones; once the public comments have been received officers are to "consider" the comments (not to report on them to any publicly accountable Council committee) and the office's conclusion is to be confirmed by a single member decision. This process is set out clearly in Camden's report paragraph 3.3 on page 3. There is to be no Council debate or any serious possibility of testing and probing the justification of this very far reaching change. Indeed the planning officers are so confident that this change will occur they are already telling developers that they will accept payment-in-lieu north of the Euston Rd. The developers for a massive proposed office block in Shaftesbury Avenue/Charing Cross Road openly stated this as fact at their recent exhibition of their development.
8. The Council's planning role is to provide strategic planning policies that in the long term protect the wider community from the vagaries of market forces. What the revision does is to acquiesce and legitimise speculative development. Camden recently adopted Islington Council wording that makes clear that developers can not base their financial appraisal of their developments on the price the land was purchased or an aspirational sum sought by a landowner. The financial viability of a developer's scheme is to be appraised based on the value of the land as a consequence of planning policy requirements, not land speculation. The fact that Camden has followed Islington's lead is very welcome. To undermine this change with the latest proposed amendment is inconsistent and frankly incomprehensible. Surely the thing to do is to bed down the site valuation change and apply the new method of

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site valuation first. If Camden seriously want to improve the delivery of more affordable housing they should not adopt the current proposal that will result in no more affordable housing being provided through the planning process south of the Euston Road and negate the recent change in site evaluation. Camden is proposing to give away an important policy position on “minimising social polarisation and create mixed and inclusive communities”

Yours sincerely

A handwritten signature in black ink, appearing to be 'Jim Monahan', written over a horizontal line.

Jim Monahan
on behalf of CGCA