

Small Sites, Small Builders

Delivery Route and Small Sites Risk Assessments
Guidance & Protocols Report



Camden

LB Camden
Inner Circle Consulting
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Distribution

Name	Role
Clodagh McCallig	CIP Team Leader – Regeneration
Israel Hurtado Cola	CIP Senior Development Manager
Hugh Robinson	CIP Development Manager

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01 Introduction

The Community Investment Programme (CIP) is LB Camden's ambitious plan to invest in schools, homes and community facilities across the borough. In September 2022, the Council committed to expanding the Programme and making an additional £1.3 billion investment that will see the Council increasing the numbers of social and affordable homes in Camden. As part of this effort, the CIP team is looking at all the potential spaces suitable to deliver new, high-quality housing in the borough.

Between July to November of 2022, CIP conducted a programme of community engagement, titled the New Homes for Small Sites Call for Ideas. The Call for Ideas used a combination of in-person drop-in and youth-focused events as well as online inputs invited via the Commonplace platform. These were promoted through posterage and targeted social media advertisements which invited community members to tell the Council where they think homes could be built in the borough. As indicated in the programme's title, the focus was on community-led small sites identification, meaning sites equating to no more than 0.25 hectares, of Council-owned land as spaces for potential housing development. This community involvement in the planning process was the first step in a wider, phased programme to not only maximise housing delivery, but also to support smaller organisations to contribute to housing development in the borough, and identify opportunities to improve local areas, uplift communities and produce social value.

Toward the end of 2023, CIP identified the Greater London Authority (GLA) Small

Sites, Small Builders funding as an opportunity to accelerate the outputs of the engagement work forward. This fund sought applicants that had oven-ready projects that took innovative approaches to increasing housing delivery on small sites, and crucially, that were replicable across London.

To submit a bid that fulfilled the GLAs requirements and could build upon the information gathered through the Call for Ideas, Camden partnered with Inner Circle Consulting. The proposal submitted centred around setting key risk metrics against optimal delivery routes to create a process for building profiles on Camden's small sites. This process could then identify the opportunities for getting homes built on those identified through the engagement.

Having successfully secured the funding, the partnership of Camden and Inner Circle commenced the testing of a risk assessment toolkit on several of the Call for Ideas sites to then workshop and refine the toolkit. This then enabled the defining of a repeatable process for the evaluation of all of Camden's small sites, supported by market engagement against potential delivery routes.

This report outlines the result of this work, which sits in an established site assessment suite of documents in Camden's SharePoint alongside the master list of all the small sites identified in the Call for Ideas, and a risk assessment toolkit with accompanying use guidance within. Read in conjunction, these outputs inform the basis on which CIP can continue to determine the best way to get

01 Introduction

more homes built on small sites across the borough, while opening the delivery process up to more small, local delivery actors.

The suite of documents originated through this work is aimed at both officers and chief executives within the council, with a dual purpose:

- a) to promote and direct a more consistent and systematic site identification and categorisation process, with embedded community input into it; and
 - b) to guide chief executives and inform governance boards on crucial considerations for strategic decision-taking.
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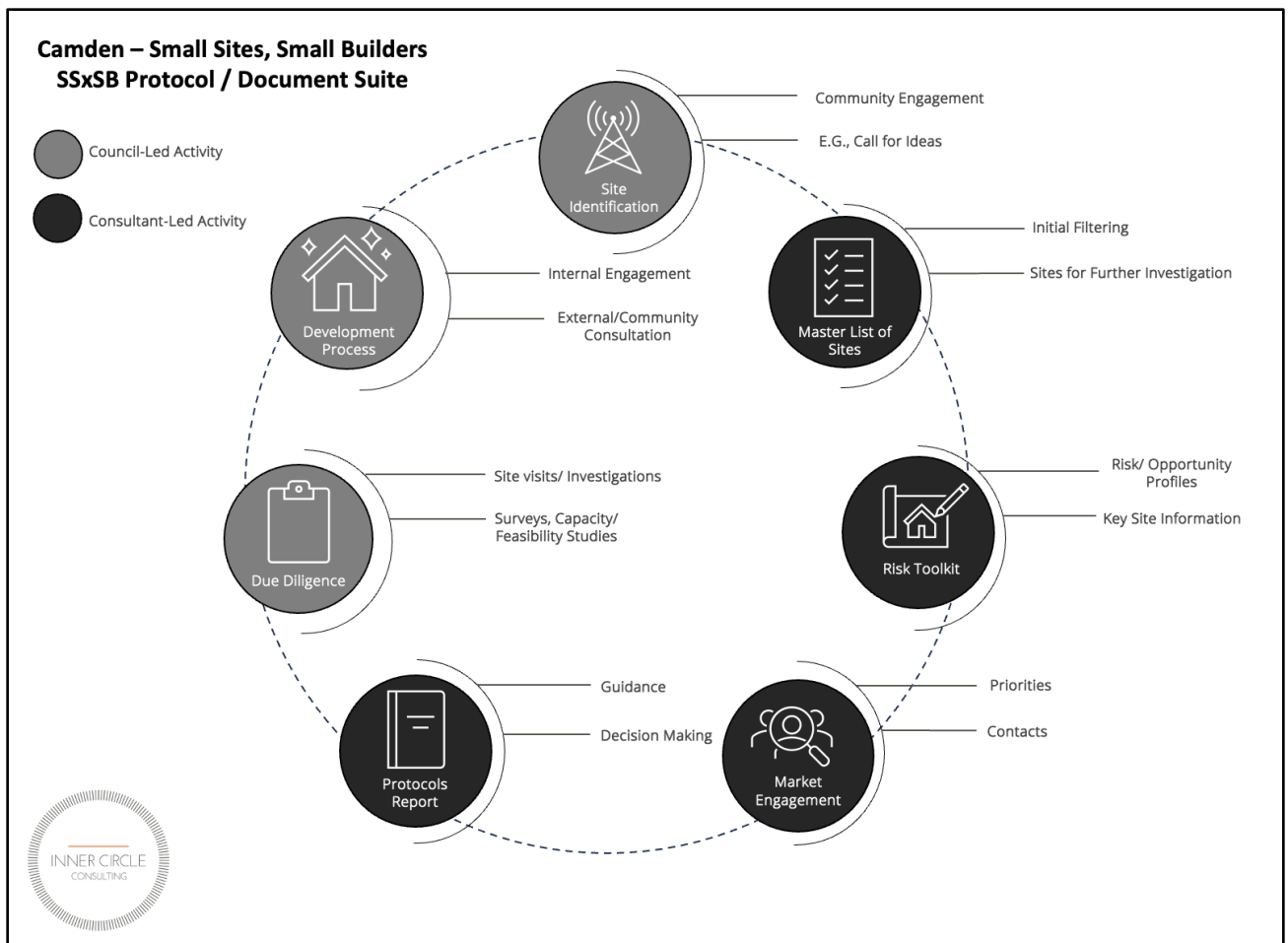
02 Site Assessment Protocols

As summarised in the below diagram, the Small Sites, Small Builders Programme has enabled the production of a process for identifying the risks of Camden's small sites to understand the opportunities therewithin. The master list of sites, risk toolkit template, market engagement log and this protocols reports are saved within a **site assessment document suite** on LBC SharePoint servers.

1. Firstly, the sites need to be identified. In Camden's case, CIP have used the Call for Ideas, but other methodologies may also be adopted. Sites can then be added to the **master list**.

It is recommended that newly added sites follow the same naming convention as the Call for Ideas (e.g., fid 1) to ensure consist reporting. Alternatively, a new naming approach could be used to distinguish sites identified through the Call for Ideas and future engagement programmes if preferred.

2. The master list hosts the key site information including its longitude and latitude, address and engagement details. Included are columns for tracking whether the site has been taking through the **initial filtering exercise**.



02 Site Assessment Protocols

This exercise takes the identified sites and checks whether it passes the following tests, which is data available via Camden's proprietary GIS interface:

- Within Council freehold ownership
- Does not have Tree Protection Orders on site or within the immediate proximity of the indicative redline
- Is outside of a Tree Conservation Area
- Is not on Designated Green or Local Plan Open Space
- Does not have any grade listed buildings on site

3. Once the site has been filtered past those metrics, the next step is to draw an **indicative redline**. This is based on the description provided through the engagement response and clarified through the datasets from Camden's GIS archive – especially for sites in Council/ Housing Revenue Account ownership. The coordinates should also give a clear picture of what the likely redline is when fed into Google Earth. There is a risk that there are multiple potential small sites within immediate proximity (e.g., infill on the same estate), so it is important that when sites are being added to the master list that each potential site for delivery is registered separately and given its own identification such that they can be recorded and assessed on an individual basis. Use basic image editing software to draw a redline over a screenshot from Google Earth of the area that housing would sit on the site.

4. Once sites have passed the initial filtering, they can be taken through **the risk assessment toolkit**. Crucially, this should be saved as a new version of the

Excel template, ensuring that the title of the document clearly indicates the site identification number. Save that toolkit to a folder titled with the site number within the provided site assessment document suite that contains all the sites identified through the Call for Ideas that passed the initial filtering.

Once saved, populate the top of the toolkit with the available site information, which includes its identification number, the site coordinates and the area/ ward the site is located. Insert the indicative redline image into the toolkit, and now it is prepared to start the assessment.

5. The template **assessment** toolkit provided contains guidance text against all the questions and the key information fields at the top. The first field to fill should be the estimated site capacity. At this stage, a basic calculation can provide an approximation of the quantum of development. This formula is to take the square metres of the site (length x width drawn with the measuring tool on Google Earth) with the assumption of a typical new build home being on average 65 sqm/ unit excluding 20% circulation (this aligns to Nationally Described Space Standards and London Housing Design Standards LPG), having a minimum of 5 metres frontages, with a proportionate number of floors to adjacent properties. Alternative methodologies can also be considered in future assessments.

Once the estimated site capacity has been calculated, users can take the site through the sections of the toolkit, answering as many questions as possible with the available information, and through

02 Site Assessment Protocols

analysis of site constraints by using web-based mapping tools such as Google Earth and Google Street View. The sections are as follows:

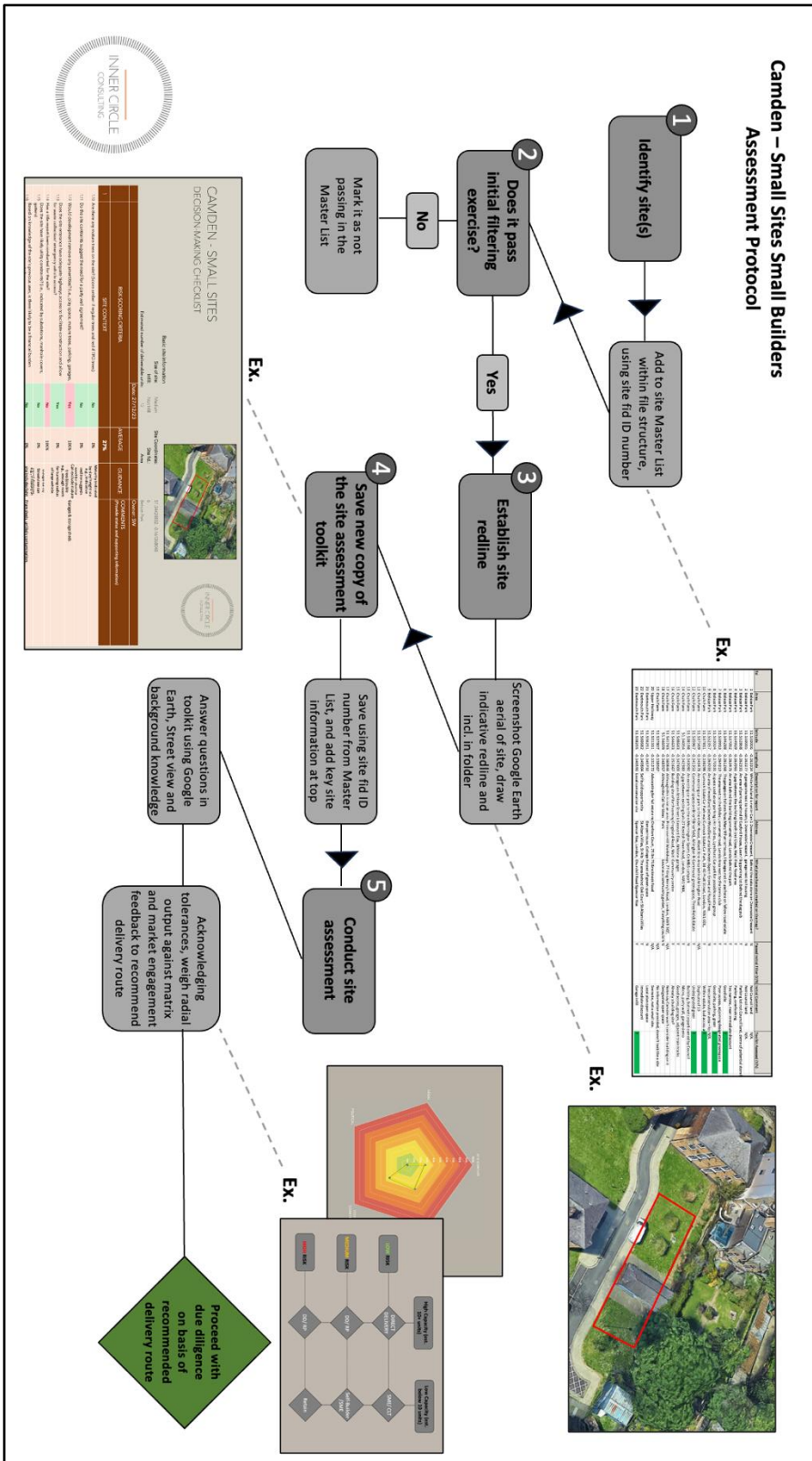
- Site Context
- Planning
- Delivery/ Construction
- Political
- Legal

More detailed information on what each section indicates about a site's risk is included in the User Guide sheet in the toolkit template, as well as guidance on how to change the formulas to alter the weighting of each risk, such that the CIP team can update the toolkit in future if desired based on evolving appetites for particular kinds of risks.

Once all the questions have been answered, the final sheet of the toolkit provides a radial diagram that summarises the profile against a Red Amber Green (RAG) background. As confirmed during the development of SSxSB programme, the radial output on the final sheet of the toolkit tells a succinct story of where the main challenges and opportunities of the site lie and helps to identify and prioritise the key further site investigations required. This then informs the subsequent analysis of suitable delivery routes.

The diagram on the following page visualises the above steps required to go from a site being identified to making a recommendation on optimal delivery route.

02 Site Assessment Protocols



03 Delivery Route Guidance

As part of the Call for Ideas initial site identification, Camden set a variety of housing delivery routes to optimise quantum and maximise diversity where possible, including:

- Direct delivery by council
- Registered Providers
- SME contractor/developers
- Self-Builders
- Community-Led Housing groups

As part of the SSxSB programme, these kinds of organisations were engaged with, and their views informed the decision-making matrix which is then used to assess the optimal delivery route based on the radial outcome of the risk toolkit.

Each of the delivery routes considered as part of this project are explored based on the types of organisations assumed preferences and alignment for particular risk profiles, based on their feedback to the market engagement. Commercial and partnership agreements were not included in the considerations but may be an area that the Council looks at in future (e.g., development agreements, building leases/licenses, joint ventures).

Direct delivery means that housing is developed and funded by the local authority (LA). The LA has complete control over the type and tenure of homes brought forward on developable land that they own in accordance with planning regulations to respond to the identified needs of the area. With that heightened control comes full ownership of the risk in this approach. This process gives the Council control over the design of whatever is built on the site.

The full details of this process are outlined in Council development procedure documentation.

Through the course of the SSxSB programme, Camden's appetites have been agreed to revolve around a likely capacity of 5-10+ units, and a low risk profile, with a preference to manage political risks through Council-led engagement rather than have a market partner do so. It should be noted that the site capacity is not an absolute in terms of discounting a site, and there should necessarily be a tolerance around the figure to accommodate for preferences for delivery on a site-by-site basis, including for specialist housing. The outputs of the Toolkit measured against Decision-Making Matrix will help inform senior officers, directors and governance processes in a more comprehensive, consistent and objective way, where final decision on preferred routes will be determined following future due diligence on a site-by-site basis.

A Community-Led Housing groups (CLH) are community-led organisations that seeks to address housing affordability and promote community empowerment. A CLH typically acquires and holds land in trust for the benefit of the community, aiming to ensure long-term affordability and sustainable development.

Their key appetites are for low value land, a relatively low risk profile and similar numbers of units per site as Council preferences.

Locally active **Registered Providers** of housing refer to organisations or housing

03 Delivery Route Guidance

associations who are officially registered with the Regulator of Social Housing to provide a range of affordable housing solutions.

Their key barriers to delivery on small sites are high land values and a lack of early planning assurances and site constraint information resulting in delivery challenges.

Self-builders of housing and CLH groups are individuals or organisations that take an active role in the design and construction of their own homes. Unlike traditional homebuyers, self-builders are directly involved in the planning, design, and often the physical construction of their residences. Self-builders may purchase land, navigate the planning process, and oversee the construction, allowing for greater customisation and potentially reducing overall costs.

Small and Medium-sized Enterprise (**SME**) **developers** refer to relatively smaller companies engaged in property development, typically focusing on smaller-scale projects compared to larger, corporate developers. Typically, their projects can have a more streamlined decision-making process, enabling quicker responses to market demands and community requirements.

Engagement with the market is ongoing, however several trends have emerged and are identified in the table on the next page. The evolving log of market engagement responses is included in the file structure as part of the submission of this report for future input and reference.

03 Delivery Route Guidance

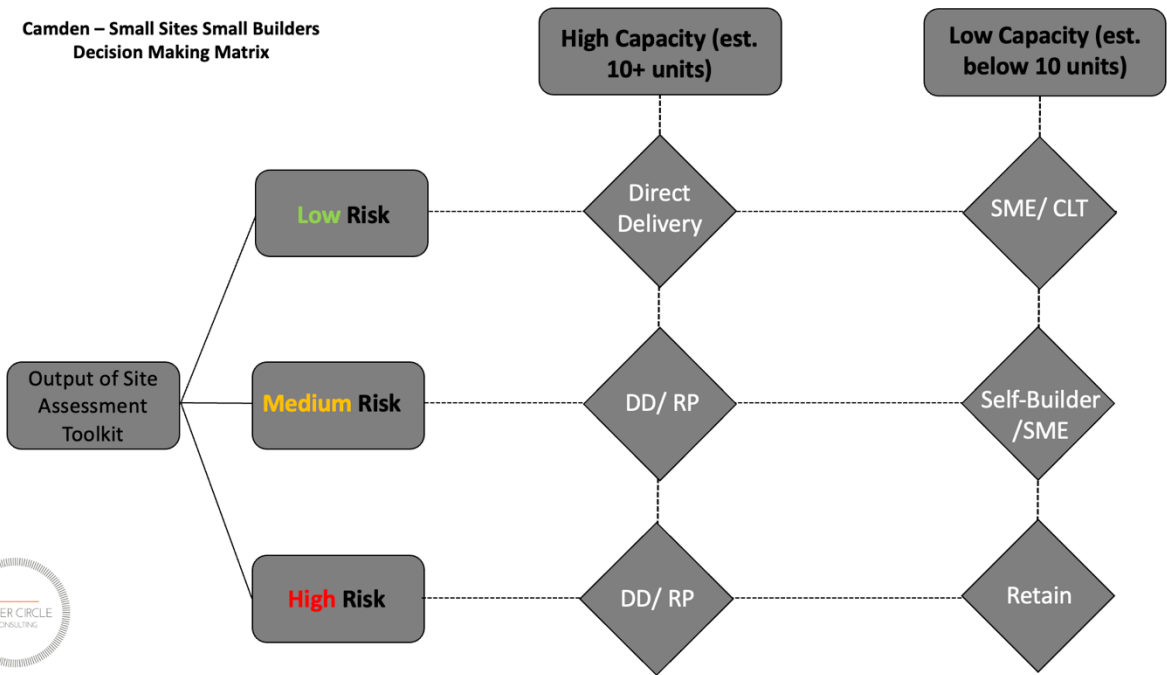
Delivery Route Organisation	Emerging Trends
CLH	Procurement – preference for Camden to standardise/ streamline the procurement process (e.g., standard leases, legal documentation). This could provide these organisations with more certainty around costs and timelines for delivery.
	Disposal – In general, land value is a key barrier to getting smaller builders involved in delivering small sites and providing more certainty around the process of land transfer was flagged as desirable. In addition, competitive procurement processes are often costly and there is a desire to see more partnership approaches being established for a portfolio of sites to ease this constraint.
	Site Packaging – respondents welcome the potential to develop more than one small site together (e.g., a package of 4 sites, each with capacity for 10 homes, giving a total of 40 new homes that can be brought forward together). This would make development management more efficient and improve the affordability of the homes built.
RP	Site Information – respondents expressed a desire to have Camden prepare capacity and/ or feasibility study, Planning Statements or Briefs, and identify site constraints through searches prior to disposal. This can help to gauge the level of remedial works or potential Highways fees that may be associated with bringing a given development forward. They also indicated that it would be helpful for Camden to prescribe a quantum of development based on the Council’s understanding of the site rather than ask bidders to maximise capacity.
	Advertisement – appetite to see small sites better advertised to understand the opportunities that are available (e.g., through a portal – either the GLAs or Camden’s own platform).

The following page contains a matrix the axes of which put likely site capacity against the risk profile of the site which has likely delivery routes against a given site. This is accompanied by a flowchart of additional considerations officers may make when looking at a site’s wider context beyond risk.

Once an assessment toolkit is completed these diagrams will support the decision-making process around the most suitable delivery route for a site. In future, it may be helpful to expand the matrix such that it is responsive to the nuance of each of the 5 risk areas that the toolkit assesses.

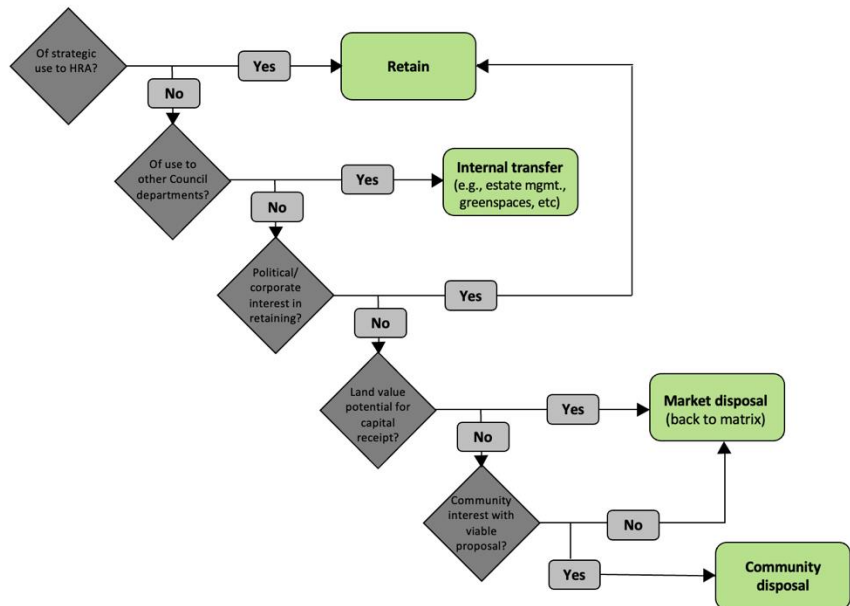
03 Delivery Route Guidance

Camden – Small Sites Small Builders
Decision Making Matrix



Camden – Small Sites Small Builders
Decision Making Flowchart

Secondary considerations to direct delivery priority on low-capacity sites



04 SSxSB Shortlist

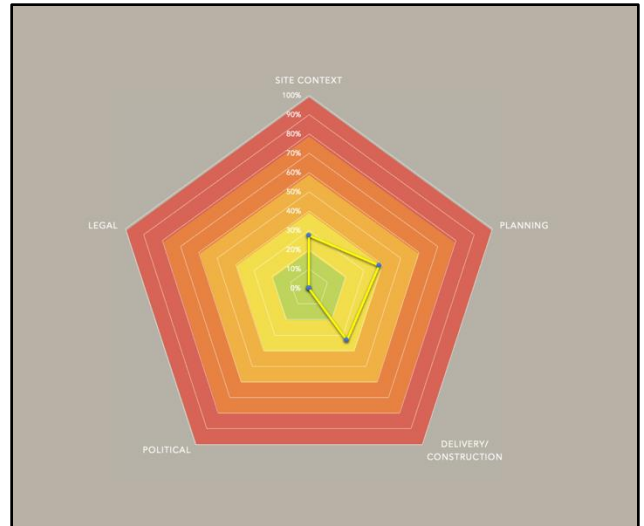
Site id: fid. 6

Coordinates: 51.54428832, -0.161268048

Estimated Site Capacity: 12 units

Recommended Delivery Route: Direct Delivery

Key Risks	Comments
Amenities	Would require removal of garages
Right to Light	Potential impact to neighbouring properties
Due to low site constraint risks and an estimated capacity above 10 units, this site would be one that Camden should likely deliver directly.	



04 SSxSB Shortlist

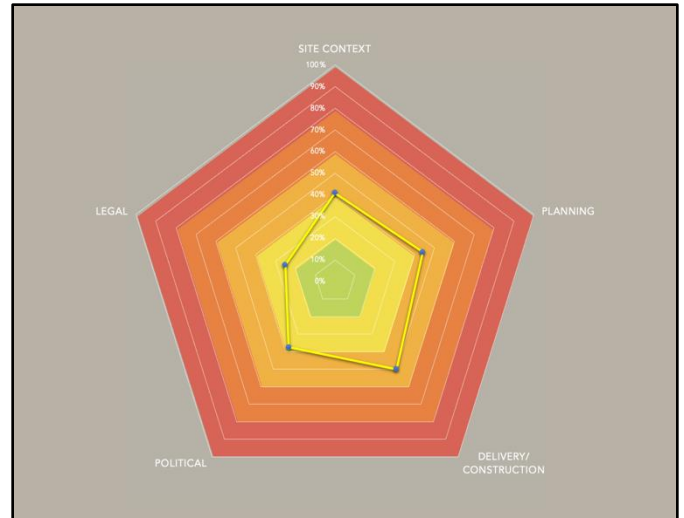
Site id: fid. 8

Coordinates: 51.55302366, -0.17033511

Estimated Site Capacity: 12 units

Recommended Delivery Route: SME developer

Key Risks	Comments
Listed Building	In adjacent site, potential impact to setting
Amenity	Removal of non-designated trees and parking
Right to Light	Mitigating risk may result in reduced site capacity
Mitigating these risks would likely reduce the potential redline and therefore a capacity more suitable for a SME developer.	



04 SSxSB Shortlist

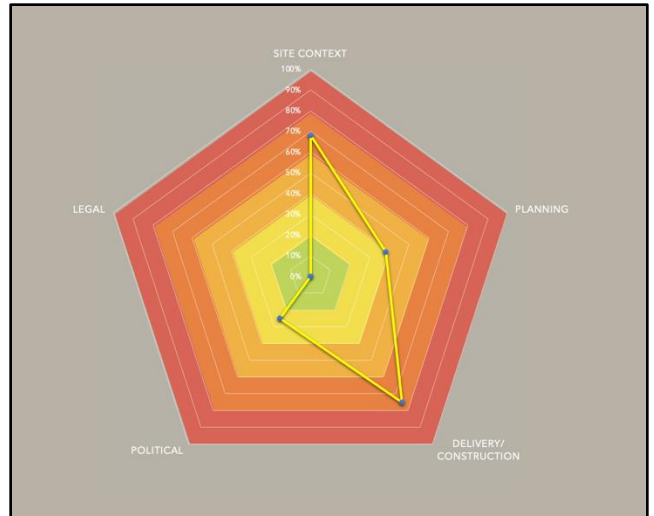
Site id: fid. 10

Coordinates: 51.53781142, -0.138297716

Estimated Site Capacity: 8 units

Recommended Delivery Route: Retain

Key Risks	Comments
Access	Restricted staging and access to indicative site
Right to Light	Surrounded by estate, severely impacts potential massing and capacity
Highly constrained site infill that is not suitable for housing but may be able to be improved by LBC green spaces.	



04 SSxSB Shortlist

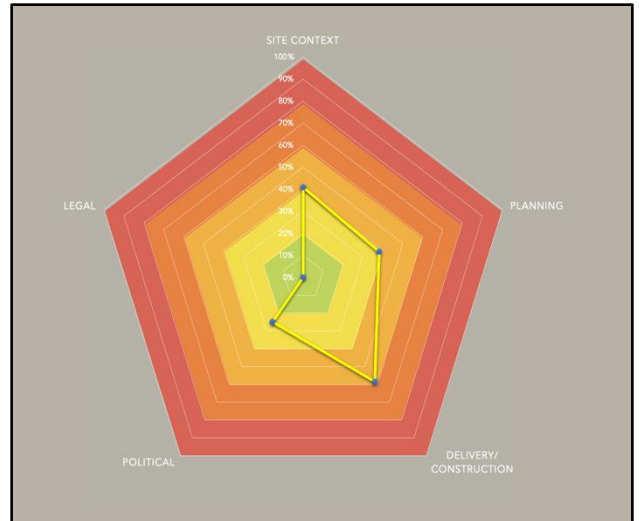
Site id: fid. 12

Coordinates: 51.5359673, -0.141352559

Estimated Site Capacity: 12 units

Recommended Delivery Route: Direct delivery

Key Risks	Comments
Resident Engagement	Greenspace may be valuable to estate residents
Overlooking	Surrounding estate constrains potential massing and redline
Right to Light	As above
Political risk of estate infill on current green space is likely better for Council to manage, despite medium risk profile indicating it could be a site for an RP	



04 SSxSB Shortlist

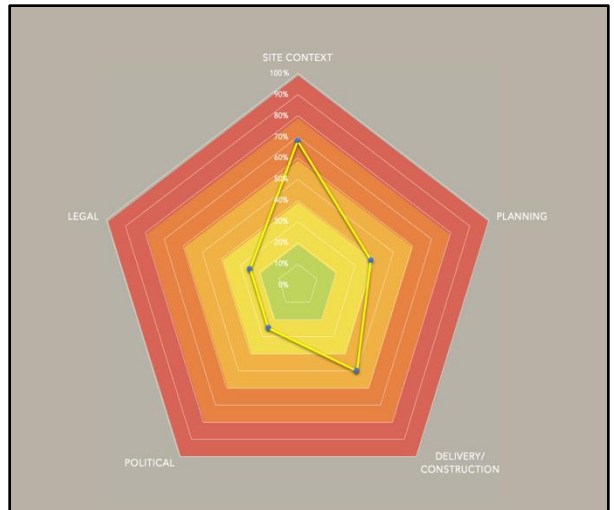
Site id: fid. 23

Coordinates: 51.55825545, -0.140592488

Estimated Site Capacity: 15 units

Recommended Delivery Route: Direct Delivery

Key Risks	Comments
Utilities	Appearance of drainage between the garages
Amenity	Removal of garages/ parking
Gradient	Site sits on podium above adjacent site's garages, further impacting amenity, and increasing likelihood of underground utilities
If the risks above can be investigated and mitigated, then can achieve higher capacity for site.	



04 SSxSB Shortlist

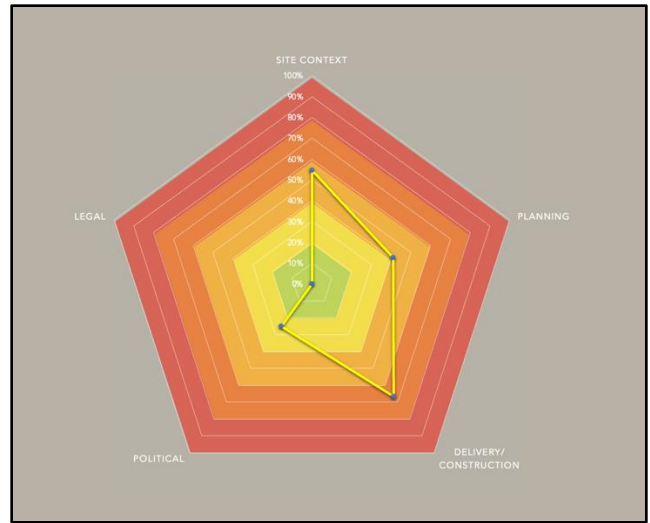
Site id: fid 33

Coordinates: 51.53046278, -0.142275779

Estimated Site Capacity: 12 units

Recommended Delivery Route: Retain

Key Risks	Comments
Access	Narrow access route to rear site
Amenity	Removal of pram sheds
Overlooking	Residents proximate on multiple sides
Poor accessibility to site is key constraint that is likely to prevent construction, but worth further investigation before discounting completely.	



04 SSxSB Shortlist

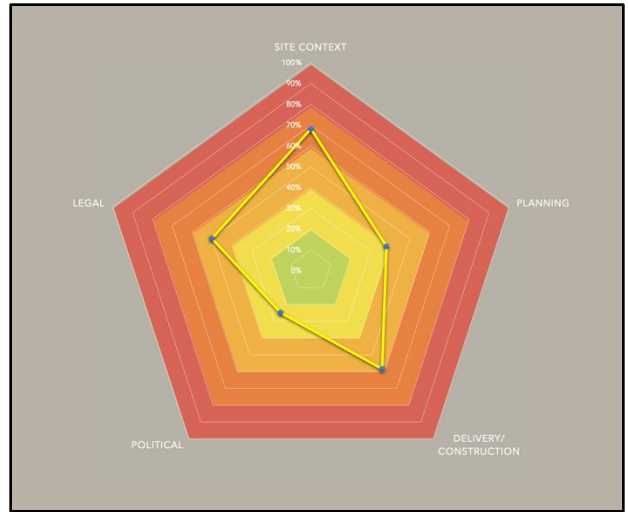
Site id: fid. 36

Coordinates: 51.52816284, -0.14139912

Estimated Site Capacity: 15 units

Recommended Delivery Route: Retain

Key Risks	Comments
Party Wall	Garden properties
Amenity	Removal of non-designated parking and garages
Overlooking	Surrounding block and rear properties
Capacity is potentially quite high, but the risks surrounding the indicative redline on all sides and make it a highly constrained site.	



04 SSxSB Shortlist

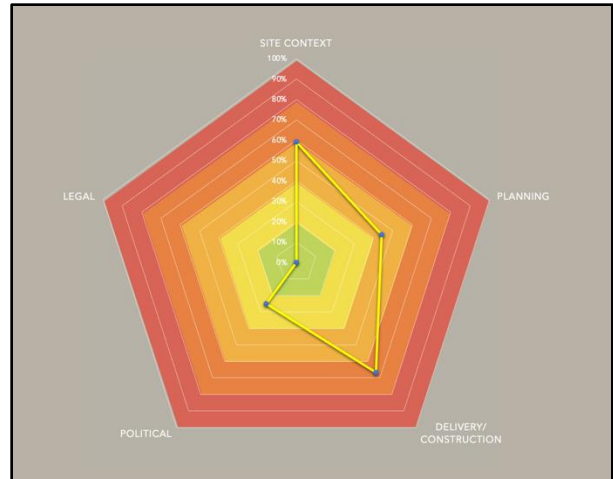
Site id: fid. 41

Coordinates: 51.5527008, -0.157725435

Estimated Site Capacity: 12

Recommended Delivery Route: Retain

Key Risks	Comments
Gradient	Below ground access to commercial units would require demolition
Utilities	Context of below ground units and surrounding utilities boxes
Requires testing of appetite for demolishing and potentially reproviding below ground units.	



04 SSxSB Shortlist

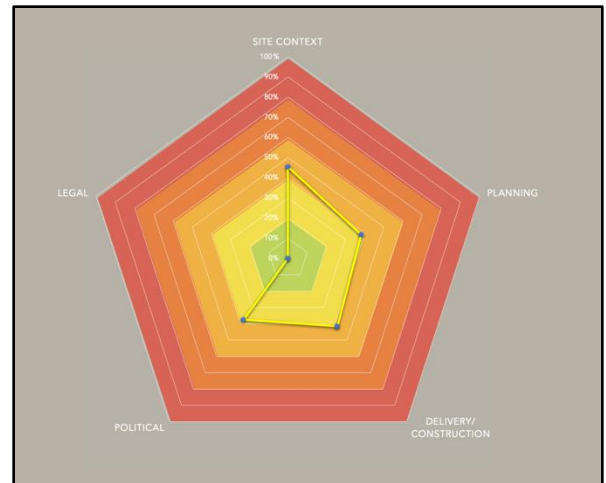
Site id: 63

Coordinates: 51.54811729, -0.141950227

Estimated Site Capacity: 15

Recommended Delivery Route: Direct Delivery

Key Risks	Comments
Listed Building	In adjacent site, potential impact to setting
Disruption	Incl. party wall agreement likely for properties to left of indicative redline
Slightly higher risk profile, but with a potential higher yield of units, particularly if considering using the adjacent space in which the play structure currently sits and reproviding that in the rear green of the estate.	



04 SSxSB Shortlist

Site id: 77

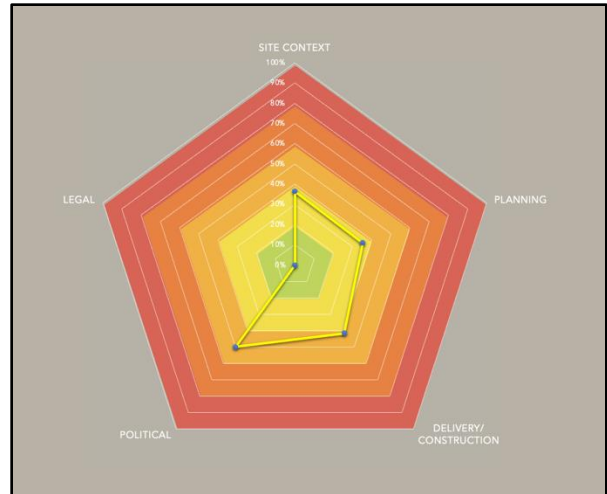
Coordinates: 51.54307316, -0.139356636

Estimated Site Capacity: 6 units

Recommended Delivery Route: Direct Delivery

Key Risks	Comments
Resident Engagement	Expression of opposition to development
Amenity	Removal of enclosed green for surrounding residents

This site was also assessed during Phase 1 of delivery and is being brought forward. Rather than a recommendation, this risk profile expresses alignment with the thinking and subsequent decision making behind the delivery route decision for this site.



04 SSxSB Shortlist

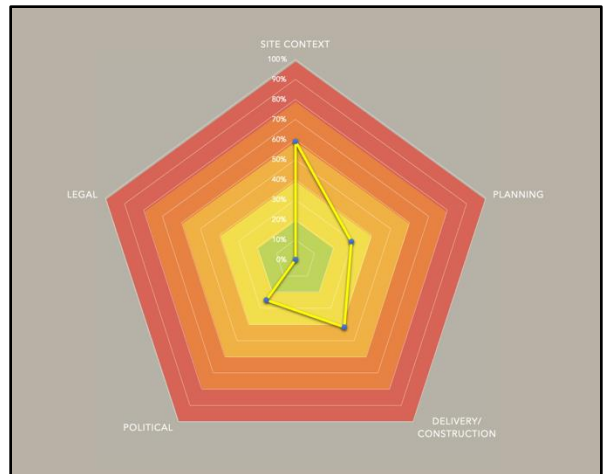
Site id: 104

Coordinates: 51.54072445, -0.135292561

Estimated Site Capacity: 3 units

Recommended Delivery Route: Self-Builder

Key Risks	Comments
Gradient	Small redline against higher surroundings
Amenity	Removal of parking
Right to Light	Limited capacity based on proximity of surrounding properties
If comfortable with managing the above risks, then low unit yield suggests a self-builder is best suited to deliver.	



04 SSxSB Shortlist

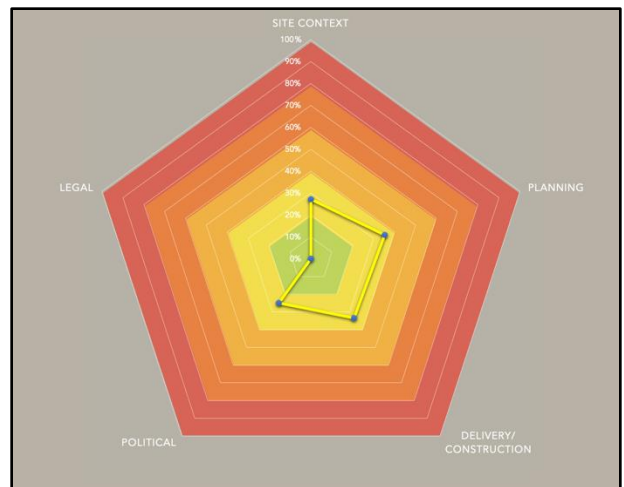
Site id: 117

Coordinates: 51.53730365, -0.190878331

Estimated Site Capacity: 15 units

Recommended Delivery Route: Direct Delivery

Key Risks	Comments
Railway	Adjacent to Network Rail lines
Amenity	Removal of non-designated trees
The Council is best suited to manage the relationship with Network Rail, that being a key stakeholder based on the site's adjacency to a rail line. That, the relatively low risk profile and the potential high capacity of the site makes it a strong candidate for direct delivery by Camden.	



04 SSxSB Shortlist

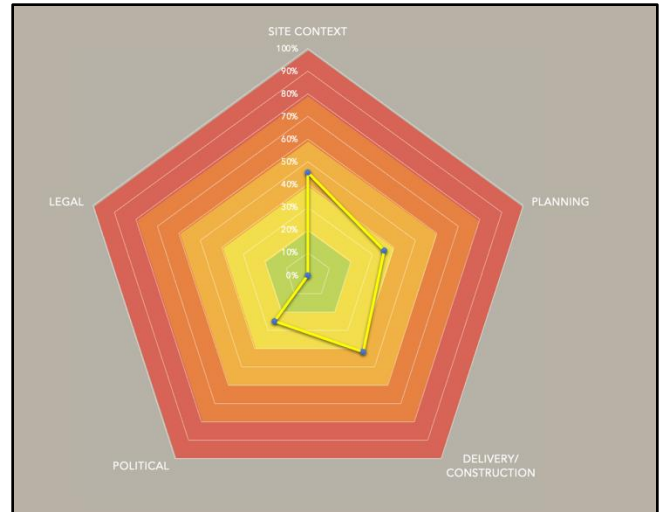
Site id: 134

Coordinates: 51.55645323, -0.140435041

Estimated Site Capacity: 2-6 units

Recommended Delivery Route: CLH

Key Risks	Comments
Amenity	Removal of parking
Overlooking	Mitigating risk may result in further reduced site capacity
Low site likely number of units and low risk suggests an opportunity for a CLH to deliver a limited number of homes on site. Would need to be able to manage overlooking risk through design.	



05 PROGRAMME CONSIDERATIONS

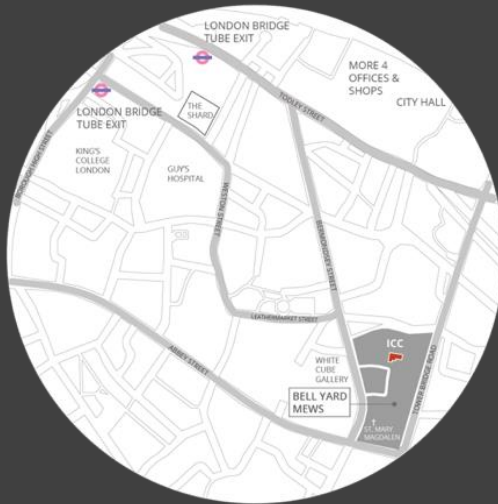
The SSxSB funding has enabled the establishment of an agreed, consistent process for assessing the preferred delivery route for small sites identified through community engagement, by defining a series of tools and protocols tailored to the Camden context, and which could be easily adapted to other boroughs across London. Inner Circle recommend the following for taking this work forward beyond the scope of the GLA funded programme:

Key Recommendations:

- Accompany cabinet and Council governance reports with a clear descriptive rationale for delivery route decisions based on assessment of core risks. These should be consistent with the current decision-making matrix and risk toolkit radial output (or a future, agreed amendment of them based on risk appetites at that time).
- Pick the most deliverable sites from those assessed as part of the SSxSB programme and get consultants to run further site capacity assessments to test alignment with the base interpretation and subsequent risk profiles against delivery routes. This can inform any amendments to the matrix and toolkit questions if required.
- Per the feedback from CLHs, consider engaging with LBC procurement regarding possibilities to standardise and streamline the process to reduce costs and delays for small site development.
- Through the workshop, it was established that sites providing under 10 units may still be preferable to the Council if they are for specialist housing, present low risk, or have other clear benefits in terms of housing and regeneration priorities. Define and codify parameters for lower capacity site appetites further.

Other Considerations:

- During the workshop as a part of this programme, the premise of site packaging to achieve economies of scale was explored. The consensus based on prior experience is that unless sites are on the same estate or in close proximity on the same road, contractors are unable to use a single welfare facility or share staging areas for construction. In the market engagement, both CLHs and RPs identified site packaging as an incentive for improving viability. Camden should prioritise any groupings of sites where packaging is possible to maximise the number of units built for a reduced cost.
- Use the site coordinate information captured during the Call for Ideas to change the “area” of the borough to correspond to Camden’s wards for ease of reference.
- Hold a repository of RPs and CLHs that are active in the borough (like that currently in place for self-builders) such that engagement on other assessed sites available for market disposal is streamlined.
- Use the feedback from this programme to test reduced value land disposal on a site that you’ve engaged a potential CLH partner with to pilot the success of such an approach.
- Investigate better alignment of Camden GIS platform to the process of conducting the initial site filtering process and definition of preliminary redline boundaries.
- Consider updating the decision-making matrix to better nuance how the profiles of the 5 risk areas in the toolkit suit particular delivery routes.
- Explore alternative/hybrid partnership approaches to delivery that may reduce funding barriers and/ or improve community buy-in to schemes.



Contact Us

Unit 3, 9 Bell Yard Mews
London
SE1 3UY

jmasini@innercircleconsulting.co.uk
swicks@innercircleconsulting.co.uk
www.innercircleconsulting.co.uk