

# Draft New Camden Local Plan

**Regulation 18 Consultation Version  
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# Introduction



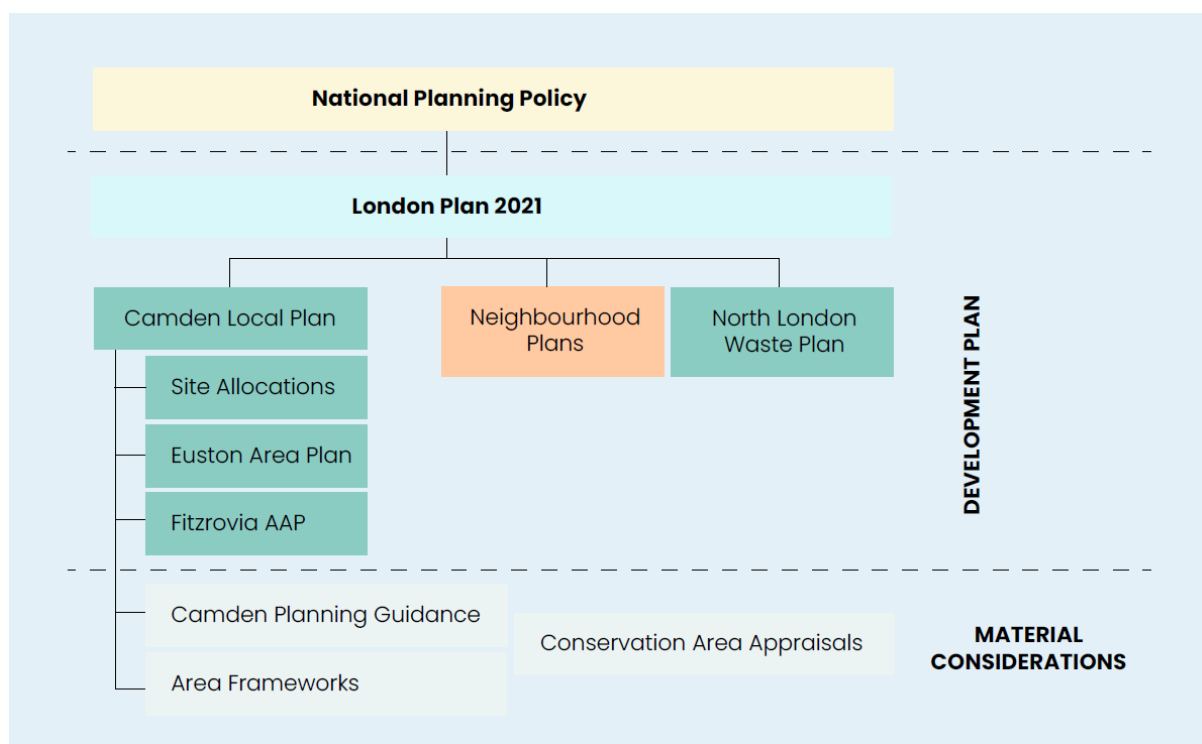
# Chapter 1: Introduction

- 1.1** The Council has started preparing a new Local Plan for Camden. This will in time replace the current Camden Local Plan (2017) and Site Allocations Plan (2013).
- 1.2** The draft new Camden Local Plan sets out the Council's vision for future development in Camden for the next 15 years and includes the planning policies and site allocations to help achieve this. It identifies how many new homes and jobs are needed to support Camden's population, and where and how they should be provided. The Local Plan also has an important role in shaping how Camden's places look and feel, promoting inclusion, reducing inequality, enhancing the environment, tackling climate change and securing sustainable neighbourhoods.
- 1.3** The draft new Camden Local Plan will ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics. It will contribute to the delivery of the ambitions, missions and challenges identified in We Make Camden and other local priorities set out in plans and strategies prepared by the Council and other service bodies. The Local Plan will cover the period from 2026 - 2041.

## Camden's Development Plan

- 1.4** The Local Plan is a key document in Camden's development plan, which is the name given to the group of documents that set out the Council's planning policies. The Council's decisions on planning applications are in line with its development plan unless there are significant matters (material considerations) that indicate otherwise.
- 1.5** Councils must have regard to the National Planning Policy Framework (NPPF) when drawing up their plans and it is a material consideration in decision making on planning applications. The NPPF is supported by more detailed National Planning Practice Guidance.
- 1.6** The NPPF includes a 'presumption in favour of sustainable development'. It states that for plan making the presumption means that local authorities should positively seek opportunities to meet the development needs of their area and that plans should meet objectively assessed needs. Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The draft new Local Plan has been prepared in accordance with the NPPF.

**Figure 1: Planning Document Hierarchy**



**Other documents in Camden’s development plan**

- 1.7 London Plan** - The London Plan is the Mayor’s planning strategy for Greater London as a whole. It sets borough level housing targets and identifies locations for future growth of London-wide importance. The London Plan forms part of all London boroughs’ development plans and Camden’s draft new Local Plan (and other development plan documents) needs to be in general conformity with it.
- 1.8 Camden Site Allocations** – this identifies known development sites in Camden’s main growth areas and other locations across the borough and sets out the Council’s expectations for them. The Site Allocations Plan was adopted by the Council in 2013 and will be replaced by the new Local Plan once it is adopted. A policy replacement schedule is set out in Appendix 4.
- 1.9 Fitzrovia Area Action Plan** – was adopted by the Council in 2014 responding to the significant pressure for development in this area and co-ordinates development proposals across a number of significant sites. The new Local Plan will replace the policies and guidance relating to specific opportunity sites within the Fitzrovia Area Action Plan once adopted.
- 1.10 Euston Area Plan** – this provides a single strategic plan to help shape change in the area around Euston Station up to 2031. It seeks to ensure that, if the HS2 high speed rail link goes ahead, we can secure the best possible future for the residents, businesses and visitors to Euston. It was prepared jointly by Camden Council, the Greater London Authority and Transport for London and was adopted by the Council in 2015. The Council consulted on an updated version of the Euston Area Plan at the



start of 2023. The draft new Local Plan has not considered potential development sites that sit within the Euston Area Plan boundary as these are being taken forward as part of the review of the Euston Area Plan.

**1.11 Neighbourhood Plans** – neighbourhood plans have been made for Fortune Green and West Hampstead (2015); Kentish Town (2016); Highgate (2017); Hampstead (2018); Dartmouth Park (2020); Camley Street (2021); and Redington Frognaal (2021). These plans set out the communities’ visions for the designated neighbourhood areas, and a range of planning policies, which are used alongside the Council’s own adopted policies when making planning decisions in these neighbourhood areas.

**1.12 North London Waste Plan** – this sets out the planning framework for waste management in the seven north London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. It was adopted by each of the boroughs in 2022 and identifies a range of suitable sites for the management of all North London’s waste up to 2031 and includes policies and guidance for determining planning applications for waste developments.

## Neighbourhood plans

**1.13** Communities can influence the future of their local areas by preparing a neighbourhood plan that sets out their vision for the area and general planning policies to guide development. Neighbourhood plans are led and written by the community, not the Council. They have to be in line with the overall strategic approach in Camden’s existing adopted plans and with national policy.

**1.14** A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. Once approved by referendum, a neighbourhood plan becomes part of the development plan for the borough and is taken into account alongside the Council’s other plans when making decisions on planning applications in that area.

**1.15** Many communities in Camden are engaged in neighbourhood planning. A list of all the neighbourhood forums in Camden is available on the Council’s website: [Neighbourhood planning - Camden Council](#)

## Other planning guidance

**1.16** The Council has prepared a number of other documents that provide advice and guidance on how our planning policies will be applied for certain topics, areas or sites, known as Supplementary Planning Documents (SPD). These documents do not have the same weight in decision making as Camden’s development plan documents, but they are important supporting documents and are material considerations in planning decisions. They are available on the Council’s website and include:

- Camden Planning Guidance (CPG) covering:
  - Access for All
  - Adverts
  - Air Quality
  - Amenity
  - Artworks, statues and memorials

- Basements
- Biodiversity
- Community uses, leisure and pubs
- Design
- Developer contributions
- Digital infrastructure
- Employment sites and business premises
- Energy efficiency and adaptation
- Home improvements
- Housing
- Planning for health and well-being
- Public open space
- Student housing
- Town centres and retail
- Transport
- Trees
- Water and flooding
- Conservation Area Appraisals and Management Strategies; and
- Planning frameworks and briefs.

**1.17** Full details of these documents can be found on the Council's website.

### **Local Plan Policies Map**

**1.18** The Local Plan Policies Map sets out the adopted policies from all development plan documents geographically, showing key sites for development and the areas where particular policies apply. The current policies map will be updated once the new Local Plan is adopted.

### **Preparing the Draft New Local Plan**

**1.19** The Council carried out initial engagement with residents, businesses, the development industry and other interested parties on the review of the Local Plan in late 2022/ early 2023. The comments received during that initial engagement have been considered in preparing the draft new Local Plan.

**1.20** The draft new Local Plan will be published for consultation and engagement with further details available on the Council's website. The results of this engagement will be used to inform the development of the next version of the Local Plan that will be published for further consultation and engagement towards the end of 2024.

**1.21** Following this, the Plan will be submitted to the government for public examination by a Planning Inspector and further comments invited. If the Plan is found sound it will be adopted by the Council for use in planning decisions, superseding the 2017 Camden Local Plan and 2013 Site Allocations Local Plan.

### **Duty to co-operate**

**1.22** Plans have to be prepared in accordance with the legal 'duty to co-operate'. The duty to co-operate requires local authorities and other public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of

preparation on strategic cross-boundary matters. The Council has engaged with neighbouring boroughs, and other relevant organisations, in the preparation of the draft new Local Plan, and will continue to work with them as work on the Plan progresses.

### **Sustainability Appraisal and Equalities Impact Assessment**

- 1.23** The draft new Local Plan has been subject to a Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Equalities Impact Assessment.
- 1.24** The Sustainability Appraisal assessed the environmental, social and economic impacts of the draft new Local Plan, including an appraisal of alternative approaches for addressing a range of key Plan issues.
- 1.25** The Equalities Impact Assessment considered the impact of the Plan on groups that are protected in terms of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In addition to a number of other socio-economic characteristics including: foster carers, looked after children/ care experienced people, low income households, refugees and asylum seekers, parents (of any gender, with children aged under 18), people who are homeless, private rental tenants in deprived areas, single parent households, social housing tenants and gypsies and travellers.
- 1.26** The Sustainability Appraisal and Equalities Impact Assessment are published on the Council's website.

### **Evidence to support the Local Plan**

- 1.27** The policies in the draft new Local Plan need to reflect up-to-date and relevant evidence about the social, economic and environmental characteristics and prospects of the borough and must meet identified needs in accordance with the National Planning Policy Framework (NPPF). The Council has collected a wide range of information and commissioned studies to support and inform the draft new Plan, including studies on housing need, employment land, retail floorspace, flood risk, and biodiversity. A viability assessment of the policies in the draft new Plan has also been undertaken. This evidence can be viewed on the Council's website.

## The Challenges We Face

**1.28** Camden's planning strategy has been prepared in the context of the social, economic and environmental changes we face as a borough. Some of the key challenges and issues we need to address in our planning policies are outlined below.

### Adapting to Camden's changing population

**1.29** Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. Camden's population is also ethnically diverse, with the 2021 Census showing that 40.5% of Camden's residents were from Black, Asian or other ethnic communities. Furthermore, the 2021 Census reports that 15.2% of residents in Camden have a disability or long-term condition that limits their day-to-day activities. This is the 2nd highest proportion amongst London boroughs and is higher than the London average (13.2%). A key challenge for the Plan is to therefore ensure that development celebrates and reflects the diversity of Camden's communities and supports the provision of accessible services and facilities to meet their needs.

### The supply and cost of housing in the borough

**1.30** Many people want to live in Camden but there is a limited supply of homes and prices are high. It is important to ensure that we help keep Camden's social mix and make sure that the borough does not become polarised between wealthy and less well-off residents. We face the challenge of providing both more homes and a more varied range of housing to meet existing and future housing needs, in particular those of young people, and families, who often struggle to find suitable and affordable homes in Camden.

### Responding to the climate and ecological emergency

**1.31** The Council declared a Climate and Ecological Emergency in 2019, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems. We Make Camden, the Council's corporate strategy, emphasises the need to adapt to meet the climate challenge that faces us, address the causes of the climate emergency and work towards becoming net-zero, while ensuring that we are supporting and protecting the most vulnerable members of our communities from the impacts of climate change.

**1.32** A key challenge for the Plan is therefore to ensure that development in Camden seeks to mitigate and adapt to climate change by using less energy; minimise the use of resources; follow the principles of a circular economy, where re-use and recycling are prioritised, and ensure that buildings and spaces are designed to cope with more extreme weather.

## Supporting Camden's centres

- 1.33** Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole. They are places of employment, shopping, leisure, and services and can be important for social, community and cultural exchange by providing places where people can meet and interact.
- 1.34** However, traditional retail-based centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out-of-centre retail locations. Our town and neighbourhood centres are under pressure from a range of issues, for example the cost-of-living crisis and hybrid working are impacting on 'footfall' (how many people use a centre), particularly in the south of the borough. A key challenge we face is therefore supporting our high streets to diversify and adapt over time in terms of managing land uses whilst ensuring that the vitality and role of individual centres is not put at risk.

## Creating a sustainable and inclusive economy

- 1.35** Camden has a very successful and diverse economy, and it makes a significant contribution to the UK economy as well as being a key part of Central London, with its concentration of businesses, retail and tourism uses. The Council wants to maintain and strengthen Camden's economic position, maximising opportunities for residents, businesses and the voluntary sector to contribute to and share in the success of Camden's economy through local procurement, business support, education, training and skills.
- 1.36** Employment is the biggest factor affecting income inequality in the borough and so we need to ensure that we help to get more people into work and help them to develop their careers in the long-term. This can be supported through a range of measures, including helping people to access training and using links with businesses.

## Inequalities

- 1.37** The success of Camden's economy is not shared by all. The borough has some of the most deprived neighbourhoods in London as well as some of the most prosperous. Inequalities particularly felt by our often 'easy to ignore' communities are compounded when taking an intersectional view. Therefore, it is even more crucial that the Local Plan aids achieving equitable outcomes in Camden for all.

## Health and wellbeing

- 1.38** Camden has one of the largest health inequality gaps in England and people suffering from poor health are generally concentrated in some of the borough's most deprived wards. We know that health is intrinsically linked to early life experience, education, employment, housing, leisure, and the local environment – otherwise known as the social determinants of health. These are the social, cultural, economic and

environmental factors that shape the conditions in which we live. Planning can play a pivotal role in influencing key health determinants, addressing inequalities, and improving the physical and mental health, and well-being, of Camden's population.

## **Improving transport**

**1.39** Camden benefits from some of the best transport accessibility in the country. It is well served by bus, tube and rail, providing links within London, to other parts of the country and to Europe. We need to go further however, to change the way we move about, to ensure that travel becomes healthier, safer, more inclusive, more efficient, more sustainable, and more affordable. Achieving this will help to improve air quality, personal health, equality and community cohesion, access to opportunities and services, and economic growth. In addition to supporting the Council's commitment to being a net zero borough by 2030 by reducing transport's contribution to climate change, helping to tackle congestion on the transport network, and creating more inclusive streets that better meet the needs of Camden's communities.

## **Quality of the environment**

**1.40** Good quality, inclusive design is essential in creating and maintaining places where people want to live and work, now and in the future. Good design is not just about making places visually attractive. It has an important role in mitigating the effects of climate change; promoting active travel; delivering high quality, accessible and adaptable accommodation that meets the needs of occupiers; and creating healthy and safe communities.

**1.41** Camden has many attractive and historic neighbourhoods (such as Hampstead, Highgate, Primrose Hill and Bloomsbury) and numerous parks and open spaces (ranging from local playgrounds to Hampstead Heath). These contribute greatly to the attractiveness of the borough. We need to make sure that new development respects the character, heritage and distinctiveness of Camden's valued and special places. Camden has also developed its first ever Diversity in the Public Realm strategy, that seeks to create a Camden that is truly representative of the people we have within our borough, through the lens of the public realm, and it is important that new development coming forward in the borough helps to deliver this.

**1.42** Planning also has an important role to play in shaping public spaces to be safe, accessible and welcoming for everyone – designing equality, connection, play and community into our streets, estates and neighbourhoods and ensuring that public spaces and new developments reflect the shared history, culture and diversity of Camden.

## **Crime and safety**

**1.43** Camden experiences the crime and disorder common in inner city areas, and antisocial behaviour, crime and drugs are major concerns for local residents. The challenge we face is to make the borough a safer place whilst ensuring it maintains the vibrancy that makes it such an attractive place to live, work and visit.

## Vision and Objectives

**1.44** The Council's vision for the borough is set out in We Make Camden. The vision for the Local Plan is therefore based on the vision of We Make Camden:

**We want to make Camden a better borough — a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone.**

**1.45** This Local Plan is a key mechanism for delivering the priorities of We Make Camden and other Council strategies including the Climate Change Action Plan, Clean Air Action Plan, Camden Health and Wellbeing Strategy, Transport Strategy and Biodiversity Action Plan.

**1.46** We Make Camden sets out six ambitions for the borough:

- i.** Camden is a borough where every child has the best start in life;
- ii.** Camden's local economy should be strong, sustainable and inclusive everyone should have a secure livelihood to support them to live a prosperous life;
- iii.** Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute;
- iv.** Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well and age well;
- v.** Everyone in Camden should have a place they call home; and
- vi.** Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.

**1.47** These are supported by four missions and six challenges, which aim to bring to life the Council's ambitions and help make them a reality in every community in Camden.

**1.48** The key missions set out in We Make Camden for the Local Plan are:

- **Young people:** By 2025, every young person has access to economic opportunity that enables them to be safe and secure.
- **Food:** By 2030, everyone eats well every day with nutritious, affordable, sustainable food.
- **Estates and neighbourhoods:** By 2030, Camden's estates and their neighbourhoods are healthy, sustainable and unlock creativity.

**1.49** The key challenges set out in We Make Camden for the Local Plan are:

- **Safety:** Everyone is safe at home and safe in our communities.
- **Digital:** Everyone in Camden can access and be part of a digital society.
- **Loneliness:** No one in Camden is socially isolated without the means to connect to their community.
- **Housing:** Camden has enough decent, safe, warm, and family-friendly housing to support our communities.
- **Climate emergency:** Camden's local economy tackles the climate emergency.

## Strategic objectives

**1.50** The Council has developed a series of objectives for the Local Plan to achieve its vision and help deliver the ambitions of We Make Camden. The strategic objectives of the Plan are set out below, alongside the six ambitions of We Make Camden (see above) and the relevant policies in this Local Plan, to show how they will contribute to and work together to achieve the objectives.

Strategic Objectives	We Make Camden Ambition	Local Plan Policy
To ensure that development in Camden responds to the climate emergency by delivering zero carbon development, optimising resource efficiency, achieving the highest possible environmental standards, and requiring buildings and spaces to be designed and constructed to adapt to, and reduce, the effects of climate change.	6	DS1, CC1, CC2, CC3, CC4, CC5, CC6, CC7, CC8, CC9, CC10, CC11, C12, D1, D2, D3, D4, D5, NE1, NE2
To increase the supply of homes to meet existing and future needs, with an emphasis on the provision of genuinely affordable homes. Self-contained housing is the priority use of the Local Plan.	1, 5	DS1, H1, H2, H4, H5, H6, H7, H8, H9, H10, H11
To make sure that development meets the needs of Camden’s diverse communities and enables safe, strong, cohesive, open, resilient and multi-generational communities, to help reduce inequality and isolation in the borough, and support the provision of accessible facilities and services to meet community needs.	1, 3, 4	DS1, H6, H8, D1, SC1, SC2, SC3, SC5, A2, T1, T2, T3, T4 IE1, IE6, DM1
To strengthen Camden’s nationally important economy and maximise opportunities for Camden’s residents, businesses and voluntary sector to contribute to, and share in, the success of Camden’s economy, through local procurement, business support, education, training and skills.	2	DS1, IE1, IE2, IE3, IE4, IE5, IE6
To ensure our town and neighbourhood centres are accessible and sustainable, to enhance their unique characters and support their varied roles as centres of trade, community activity, creativity, business, tourism and learning.	2	DS1, IE1, IE5, IE6, SC2, SC5, D1, D7, D8, T1, T2, T3, T4
To promote high quality, inclusive and sustainably designed development which protects resident’s amenity, respects the unique character and history of Camden’s neighbourhoods, celebrates and reflects the diversity of Camden’s communities, and enables families to remain and thrive.	1, 3, 4, 6	DS1, CC1, D1, D2, D3, D4, D5, A1, A2, H1, H6



Strategic Objectives	We Make Camden Ambition	Local Plan Policy
To promote active and sustainable transport, where walking, wheeling and cycling are the safest and most convenient options; invest in public transport; and reduce reliance on private cars, to reduce air pollution and improve health and well-being.	3, 4, 6	DS1, T1, T2, T3, T4, T5, A3, CC1, SC1, D1
To improve access to parks, green spaces and biodiversity, by protecting and enhancing existing assets and providing new green spaces and habitats.	6	NE1, NE2, NE3, SC3, SC4, DS1, D1
To promote health and well-being and reduce physical and mental health inequalities through good design and place making; improving access to nature; enabling affordable healthy food choices; supporting people to lead healthy and active lifestyles; and improving access to healthcare.	4, 6	SC1, DS1, H6, H8, D1, D2, D3, SC2, SC3, SC4, SC5, NE1, NE2, T1, T2, T3, T4, A1, A2, A3, A4

# Development Strategy



# Chapter 2: Development strategy

- 2.1** The Local Plan sets out the overarching development strategy for Camden over the period to 2041. The development strategy aims to address the long term needs of the borough and respond to the challenges it faces. It maximises the opportunities that exist for providing new and affordable homes, and jobs, and the infrastructure required to support this, whilst seeking to ensure that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents. It provides the strategic framework and context within which the rest of the Plan has been developed.

## The need for new homes and jobs

- 2.2** It is important that Plan seeks to deliver a sufficient supply of new and affordable homes, and jobs in Camden to meet the needs of our communities both now and in the future.

### New homes

- 2.3** The London Plan 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.
- 2.4** The Local Plan is required by the National Planning Policy Framework to look forward over a 15 year period from the date of adoption. This Plan will therefore cover the period to 2041. As the Plan period extends beyond that for which housing targets are set in the London Plan, a housing requirement has been set for the whole Plan period having regard to paragraph 4.1.11 of the London Plan. This equates to the need to deliver 11,550 additional homes over the plan period to 2041, which is the equivalent of 770 homes per year.
- 2.5** In calculating the housing requirement for the Plan period, we have taken into account the housing capacity figures for large sites as set out in the Greater London Authority's Strategic Housing Land Availability Assessment 2017, together with the continuation of providing 328 new homes a year on smaller sites across the borough. The Council recognises however that the London Plan is likely to be reviewed during the lifetime of this Local Plan, and this will set a new housing target for Camden.
- 2.6** The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable. The Council will aim to maximise the supply of affordable housing in Camden, to deliver a borough wide strategic target of 3,000 additional affordable homes over the period between 2026/27 and 2040/41. Further information on the Council's approach to affordable housing delivery is set out in Policy H4 (Maximising the supply of affordable housing).
- 2.7** The Council proposes to meet its housing requirement through existing permissions for committed schemes, site allocations and windfall development (proposals that come forward on sites that have not been allocated for development). To this end, the Plan makes a number of site allocations to deliver

the additional houses required over the plan period and these are set out in the area chapters for South, Central, West and North Camden.

- 2.8** Further details of the Council’s strategy for maximising housing supply to meet identified need and the rationale for this is set out in Policy H1 (Maximising Housing Supply).

## **Jobs**

- 2.9** The Council’s Economic Needs Assessment 2023 forecasts a demand for approximately 406,359 sqm of net additional office floorspace (use classes E(g)(i) and E(g)(ii)) by 2041. This takes account of future labour projections and has allowed for changes in working practices.

- 2.10** The Council proposes to meet this need from:

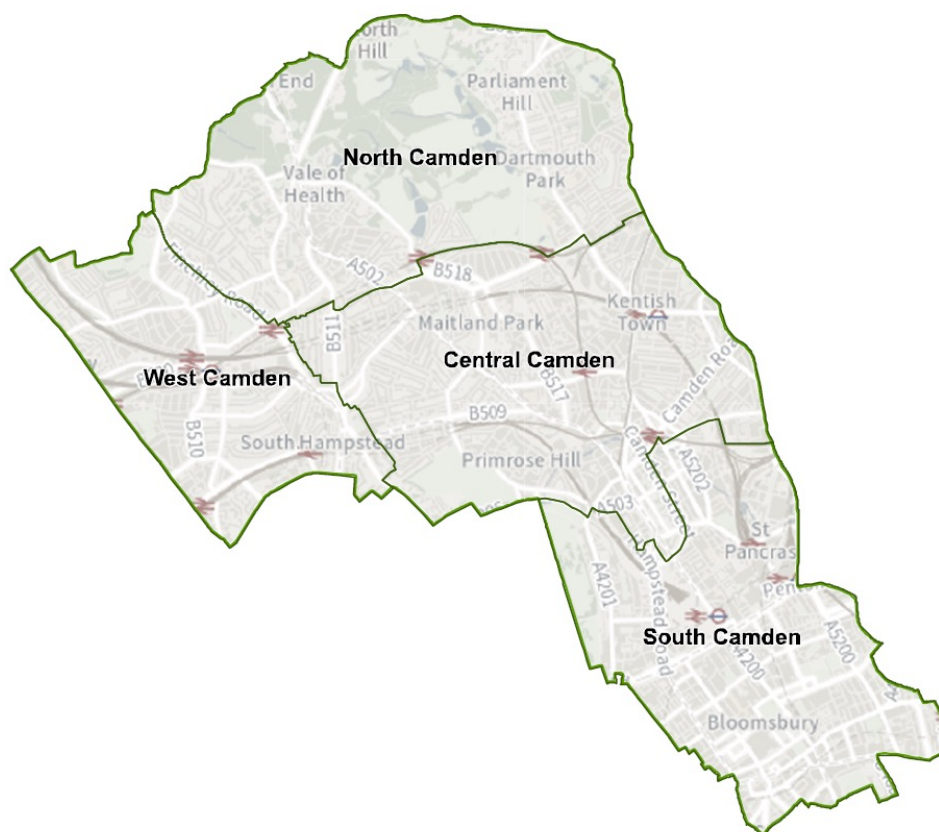
- Existing planning permissions - the Study has identified that existing approvals of major schemes total approximately 211,028sqm (net internal area) office floorspace, of which the vast majority of schemes are under construction or expected to be delivered in the first 5 years of the Plan period.
- Site allocations – suitable sites have been allocated for development in this Plan to deliver new employment floorspace in the borough.
- Windfall development – this is expected to deliver increases in office floorspace both in the CAZ and in other centres commensurate with their individual size and role.

- 2.11** Further details of the Council’s strategy for delivering a sustainable and inclusive economy are set out in Chapter 9 Delivering an Inclusive Economy.

## **Spatial Strategy**

- 2.12** This Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden, as shown on the map below.

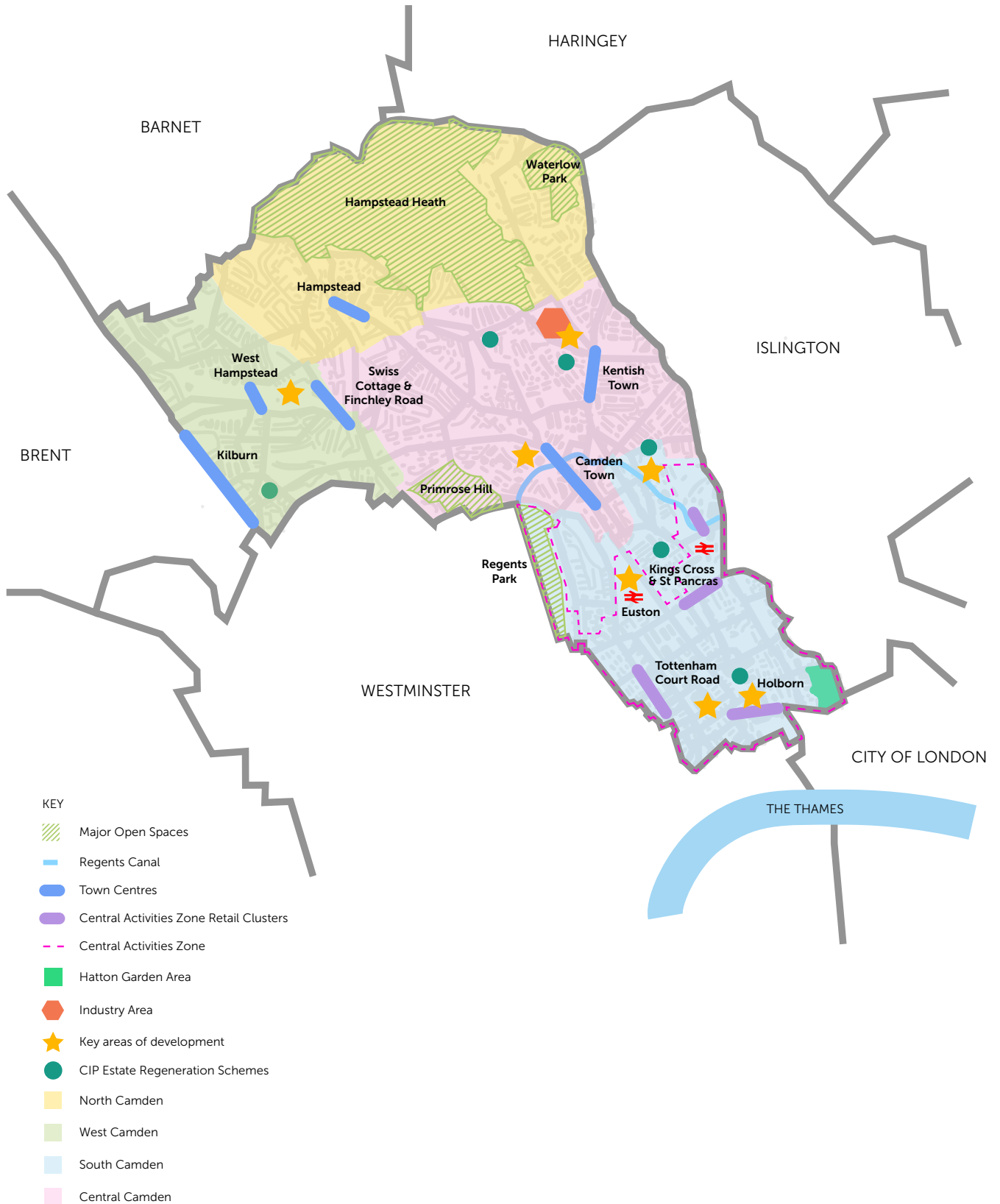
## Map 1 – Local Plan Sub-Areas



- 2.13** The strategies for the sub-areas set out the Council's approach to the delivery and location of new homes, jobs, retail and leisure uses, and infrastructure in each of these areas, in line with the Plan's vision and objectives. With the aim of directing development to the most accessible and well-connected locations in Camden, including the growth areas around King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead and Kentish Town; and the town centres of Camden Town, Finchley Rd/Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead; in addition to supporting estate renewal schemes delivered through the Council's Community Investment Programme.
- 2.14** Within each area site allocations have also been identified, in accordance with the Council's development strategy, to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities together with necessary infrastructure. Sites have been selected for allocation in line with the guidance set out in the National Planning Policy Framework and associated National Planning Policy Guidance. Further information on how sites have been identified and assessed is set out in the Site Allocations Topic Paper.
- 2.15** The Council's overall spatial strategy is illustrated on the Key Diagram below. This shows the main focus of development in Camden, town centres, main Community Investment Programme (CIP) areas (where we expect a concentration of development to be located) together with major transport hubs and main open spaces.

Figure 2 – Key diagram

# LONDON BOROUGH OF CAMDEN



- 2.16** Further details on the Council’s strategy for the sub-areas of South Camden, Central Camden, West Camden and North Camden are set out in Chapters 3, 4, 5 and 6 of the Plan.

## Delivering healthy and sustainable development

- 2.17** A key priority of the development strategy is to ensure that development in Camden makes a positive contribution to the borough to deliver the vision and objectives of the Local Plan, the ambitions, missions and challenges of We Make Camden and the Good Life Camden framework – a tool that has been developed to help the Council understand what matters to people in Camden and assist us in measuring our impact on this.
- 2.18** Policy DS1 seeks to ensure that all development in the borough contributes to ‘Good Growth’, which is socially and economically inclusive and environmentally sustainable, in order to maximise community benefit, respond to the climate emergency, create stronger communities and deliver healthy places, both for existing communities and future generations.

### Policy DS1: Delivering Healthy and Sustainable Development

- A.** The Council will require development to support the creation of healthy and sustainable places in Camden by:
- i.** Ensuring that new buildings and public spaces are of the highest design quality; respect local context; are inspired by the character of Camden’s neighbourhoods and communities; and are inclusive, accessible, safe and welcoming, to meet the needs of Camden’s diverse population;
  - ii.** Delivering buildings that achieve net zero carbon emissions, optimise resource efficiency and are designed to be resilient to climate change;
  - iii.** Ensuring that land is used efficiently, and that a development makes best use of its site. The Council will resist development that makes inefficient use of Camden’s limited land;
  - iv.** Providing a mix of uses, services, facilities and amenities that meet the needs of the local community and are easily accessible on foot, by bike and via public transport. Self-contained housing is the priority land use in the Plan;
  - v.** Ensuring that the necessary infrastructure is provided in a timely way to support Camden’s communities. Key infrastructure projects and programmes are set out in Appendix 1.
  - vi.** Protecting amenity, improving air quality and incorporating measures to reduce flood risk;
  - vii.** Providing new open space, and opportunities for play, recreation and sports;
  - viii.** Maximising opportunities for enhancing biodiversity, improving access to nature, tree provision and community food growing;
  - ix.** Improving strategic and local connections and increasing active travel; and
  - x.** Ensuring that sites are designed and developed comprehensively. Piecemeal delivery will be resisted, particularly where it would prejudice the realisation of the vision for the area, result in worse outcomes, or where the timing of delivery would be unsupported by infrastructure.

- B.** To monitor the impact of development on Camden’s communities the Council will expect major applications to contribute to the Council’s Citizen Scientist community research programme. Contributions will be secured using Section 106 agreements.

## **Creating healthy and sustainable places**

- 2.19** Where we live has a profound impact on our health and well-being, it is therefore important that new development helps to improve the built, natural and social environment in Camden, to create places that promote good health and well-being, are safe, welcoming, accessible and inclusive, encourage social interaction and support healthy and active lifestyles to meet the needs of Camden’s communities. Linked to this is the need to ensure that development responds to the climate and ecological emergency, to ensure we are creating sustainable places that achieve net zero carbon emissions, optimise resource efficiency and are designed to be climate resilient to safeguard our environment for future generations.
- 2.20** Development proposals coming forward in Camden should therefore be designed in accordance with Policy DS1 (Delivering Healthy and Sustainable Places), having regard to other policies in the Plan, particularly Policy SC1 (Improving Health and Wellbeing), Policy D1 (Achieving Design Excellence) and the climate change policies in Chapter 8.

## **Mixed use developments**

- 2.21** Developments will be expected to use land efficiently and make the best use of a site. The provision of an appropriate mix of uses, both within areas and in individual buildings, can contribute to successfully promoting future growth in Camden and making efficient use of its limited land. A mix of uses can:
- increase the provision of much-needed housing;
  - promote successful places that have a range of activities and are used throughout the day, increasing safety and security;
  - reduce the need to travel by locating a range of uses together and so reduce the need for some journeys, helping to cut congestion in the borough and improve air quality;
  - ensure that communities are supported by a range of infrastructure to meet their daily needs.
- 2.22** The Council will resist development that makes inefficient use of Camden’s limited land.

## **Design**

- 2.23** When designing developments, applicants should have regard to the other policies in this Plan, which provide further and detailed guidance on a number of different topics including sustainability, housing, design, the natural environment, communities and transport.



- 2.24** Area frameworks should be prepared to help bring forward development in a comprehensive way and ensure that new development delivers high quality design and place-making, to deliver the vision and objectives of the Plan and the priorities set out in policy D1 (Achieving Design Excellence).
- 2.25** Area frameworks should provide a clear vision for a site and set out the scale and layout of development proposed; mix of uses; connections and routes; public and green spaces. Area frameworks must demonstrate compliance with the relevant policies in this Plan and evidence how the scheme will deliver community benefits and social value both on-site and in the wider area. Where relevant, area frameworks should also be accompanied by a phasing plan, to avoid piecemeal development and ensure infrastructure is provided as it will be needed.
- 2.26** Area frameworks should be prepared at an early stage in the planning process, in consultation with the Council, key stakeholders and the local community.

### **Citizens Scientists**

- 2.27** To monitor the impact of development on Camden's communities the Council will expect major applications to contribute to the Council's Citizen Scientist community research programme.
- 2.28** Citizens Scientists will undertake research with Camden's communities in areas where significant change is planned, to identify local priorities, issues and opportunities, to help shape future investment and service provision, to support the creation of healthy and sustainable communities. The research will be documented and form a rich reserve that developers can draw upon to inform the design of schemes. Contributions will be secured using Section 106 agreements.

# South Camden



# Chapter 3: South Camden

3.1 The South of the borough includes the neighbourhoods of Covent Garden, Holborn, Hatton Garden, Gray's Inn, Bloomsbury, Fitzrovia, Euston, Regents Park, King's Cross, St Pancras and Somers Town. At the heart of these neighbourhoods are strong and diverse residential communities which form part of a dense mix of uses, from renowned institutions such as the British Museum and University College London, to the focus of London's legal profession within Holborn, the retail attractions of the West End at Tottenham Court Road and Seven Dials in Covent Garden, offices for major businesses and tech and life sciences clusters in the Knowledge Quarter.

Map 2 – South Area



- 3.2** The area is characterised by a mix of historic and modern buildings of significant scale and at high densities. Large parts of the South of the borough are also covered by conservation areas, with historic London squares and high numbers of listed buildings.
- 3.3** The South of Camden is highly accessible and has excellent public transport links, with nine underground stations, multiple bus routes and three major railway stations, connecting Camden with the rest of the UK and mainland Europe.
- 3.4** The area forms a significant part of London's Central Activities Zone (CAZ). The CAZ is a major business and employment centre, which contains a significant proportion of the borough's office floorspace. It is home to clusters of financial and professional services, technology and creative industries, in addition to specialist clusters of medical excellence, life sciences research and law. The CAZ also has a diverse and vibrant retail and leisure offer focused on a number of CAZ retail clusters and other specialist shopping areas.
- 3.5** CAZ retail clusters are major shopping areas within the Central Activities Zone. They generally either have an international, national, or London wide role in the shopping services that they provide, including a range of comparison or convenience goods and services for the local resident, worker and visitor populations. Camden has four CAZ retail clusters: Tottenham Court Road / Charing Cross Road / New Oxford Street; Holborn (High Holborn / Holborn and Kingsway); King's Cross / Euston Road; and King's Cross Boulevard and Coal Drops Yard. There are also many distinct localities within Camden's CAZ Area which have specific characters. These contain clusters of specialist activities and in some instances also have concentrations of food, drink and entertainment uses. These specialist shopping areas are: Covent Garden; Fitzrovia and south-west Bloomsbury; Hatton Garden; Museum Street; and Denmark Street.
- 3.6** This area is also home to the 'Knowledge Quarter' (KQ), centred around King's Cross and Euston. Since the last Local Plan was adopted in 2017, the 'Knowledge Quarter' has expanded and consolidated its reputation as an internationally significant innovation district, harnessing collaboration between private sector companies, universities, hospitals and research establishments in fields such as medical and life sciences, data analytics and machine learning. The KQ has the potential to lead the way in inclusive innovation, and become the best place in Europe for collaboration, innovation and research.
- 3.7** However, despite the focus on offices and 'knowledge quarter' uses in this area, pockets of industrial land remain, with concentrations around Camley Street and St Pancras Way, in King's Cross.
- 3.8** In terms of community provision, the South of the borough is well served by community facilities, with libraries in Pancras Square, King's Cross and Holborn; leisure centres in Pancras Square, King's Cross and Covent Garden; and a number of community centres.
- 3.9** The largest area of open space in this part of Camden is Regent's Park, which straddles both Camden and Westminster. Other key areas of public open space include: Camley Street Nature Reserve, St Pancras Garden, Lincoln's Inn Fields,

Russell Square Gardens, Coram Fields, Gordon Square and Tavistock Square. Whilst the majority of the South of the borough is well served by public open space, the areas of Hatton Garden and Fitzrovia remain comparatively less well served.

**3.10** The South of the borough is covered, in part, by the Camley Street Neighbourhood Plan, which sets out the community's aspirations and planning policies for that area. The Neighbourhood Plan is part of the Council's statutory development plan and is taken into account, alongside our own policies, when making decisions on planning applications in that area. Neighbourhood Areas have also been designated at Somers Town, Mount Pleasant, Fitzrovia East and Drummond Street.

**3.11** The main focus of development in the South of the borough over the last 10 years has been at King's Cross, however development here is nearly complete. A number of other locations in this area are expected to deliver new homes, jobs and infrastructure to support Camden's communities, the most significant being on the industrial sites at Camley Street, where there is opportunity for intensification and diversification to create a new neighbourhood, whilst ensuring the continued provision of industry and employment uses in a way that makes the most effective and efficient use of the land available. Major development is planned at Euston, however this is likely to come forward towards the end of the Plan period and will be guided by the Euston Area Plan. Further development is also planned around Holborn and through the Council's Community Investment Programme. The policy below sets out the Council's strategy for the South of the borough to guide the future development of this area.

## **Policy S1 – South Camden**

**A.** The Council will ensure development in the South of the Borough contributes to the area's continued success and London-wide role, while delivering social, economic and environmental benefits for Camden's residents, making the area a more habitable, climate resilient and inclusive place.

### **New homes**

**B.** Sites have been allocated in the South of the borough to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocation policies set out below.

**C.** The focus of development in the south of Camden will be the areas around King's Cross and Holborn, with limited development expected in the Tottenham Court Road Opportunity Area (as defined in the 2021 London Plan), as development here is largely complete. Major development is also planned at Euston, which is likely to come forward towards the end of the Plan period and will be guided by the Euston Area Plan.

**D.** Development around King's Cross will mainly be delivered through site allocations at Camley Street and St Pancras Way, which are expected to deliver approximately 1,380 new homes. This area has the potential to strengthen its role as a location for employment and business; and deliver a significant increase in the number, mix and affordability of homes; to enable the area to fully realise its potential and become a more distinctive, vibrant, and mixed urban neighbourhood. To deliver

the Council's and community's vision and objectives for this area, we will expect development to be taken forward in accordance with the Canalside to Camley Street Supplementary Planning Document and the Camley Street Neighbourhood Plan.

- E.** Development around Holborn has the potential to strengthen its role as a location for business, due to the enhanced access brought by the Elizabeth Line, and create more vibrant and better connected neighbourhoods in the heart of Central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and much needed new self-contained homes. Sites have been allocated to deliver approximately 250 new homes. To deliver the Council's vision and objectives for Holborn, the Council will expect development in this area to be taken forward in accordance with the Holborn Vision and Urban Strategy.
- F.** The Council is committed to a programme of estate renewal and regeneration delivered through the Council's Community Investment Programme (CIP). The main focus of this work in the South of the borough is the Agar Grove Estate, north of Camley Street and the Tybalds Estate in Holborn. Development coming forward in the South of the borough will be required to support the Council's estates mission and assist with the delivery of the Council's priorities for nearby housing estates.
- G.** Where windfall sites come forward for housing development in this area, these will be determined in accordance with the policies in the Plan.

### **Employment and the Economy**

- H.** New employment floorspace (including lab, or lab enabled floorspace) will be delivered in the South area of the borough through site allocations, existing planning permissions and the development of windfall sites.
- I.** The Central Activities Zone (CAZ) and Knowledge Quarter centred on King's Cross and Euston will continue to be the main focus for employment development in Camden.
- J.** The Council will support the Knowledge Quarter (KQ) to thrive as a hub of innovation and knowledge-intensive industries in line with the KQ2050 Strategy, and ensure that its growth and development are inclusive, sustainable, and community-focused. To ensure the sustainable growth and success of the KQ, major proposals for additional employment, research and/or learning floorspace within this area will be required to contribute to reducing inequalities and increasing life chances in local residential communities by maximising community benefit at the planning, construction and end user phases, including supporting increased access to jobs, skills training and educational opportunities.
- K.** The Council will ensure that new employment development is designed in a way that fosters openness and inclusivity by avoiding closed 'campus-style' developments and enabling wider public access to facilities such as lobby spaces, roof gardens, cafes, and gyms wherever possible.

- L. The Council will support the specialist clusters of activity in the CAZ, including the centres of medical excellence at University College Hospital, the Wellcome Trust and Great Ormond Street; life sciences research at the Francis Crick Institute; and the centre for law and the legal profession at Lincolns Inn in Holborn.
- M. The Council will support the Bloomsbury Campus Area to maintain and expand its role as the heart of higher education in Camden in line with Policy S3 below.
- N. The Council will continue to protect and promote the specialist employment area of Hatton Garden as a location for jewellery related uses in accordance with Policy S2 below.
- O. The Council will continue to manage and protect the supply of industrial land in this area in line with Policy IE3 (Industry). The Council will ensure that development on allocated sites at Camley Street and St Pancras Way re-provides, and seeks to increase, the amount of employment floorspace across this area, including the appropriate re-provision of industrial, storage or distribution floorspace that supports the functioning of the CAZ and local economy, as part of mixed-use intensification proposals on individual sites or across multiple sites through a wider area plan.

### **Retail and Town Centres**

- P. The majority of new retail development in the South of the borough is expected to be delivered through development at Euston, towards the end of the plan period, with additional provision to be made as part of re-use and re-development schemes coming forward in the CAZ retail clusters of Tottenham Court Road, Charing Cross Road, New Oxford Street, High Holborn and Kingsway.
- Q. The Council will support and protect the CAZ retail clusters, Specialist Shopping Areas and Neighbourhood Centres in the South of the borough, in accordance with Policy IE6 (Supporting town centres and high streets), to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors. As part of this, the Council will continue to manage the location and concentration of food, drink and entertainment uses in this area and their impact.
- R. The South of the borough is also a key focus of the evening and night-time economy in Camden, and the Council will support efforts to widen the range of evening and night-time economy uses in the CAZ retail clusters, particularly where this will benefit local residents and people working night shifts, in line with the objectives set out in the Council's emerging Evening and Night-time Economy Strategy.

### **Infrastructure**

- S. To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure, from appropriate development. The Council will work with relevant providers to ensure that the necessary infrastructure is secured, in order to provide the facilities needed for the borough's communities. Key priorities for the South of the borough include:
  - i. The delivery of High Speed 2 and station improvements at Euston;

- ii. The planned station upgrade at Holborn Underground station to increase capacity and provide step free access from street to platforms;
- iii. The transformation of Euston Road and the removal of the King's Cross gyratory;
- iv. The delivery of new and improved pedestrian and cycle links in accordance with the Council's Transport Strategy;
- v. The potential creation of a new canal crossing to improve connectivity between King's Cross, Camley Street and St Pancras Way;
- vi. To connect, improve, make public and, where possible, reinstate historic lanes, alleyways and passages in and around Holborn to increase permeability and encourage walking;
- vii. The delivery of an extensive "Liveable Neighbourhood" scheme in Holborn, with new areas of public realm and significant road safety improvements for pedestrians and cyclists, building on the success of the West End Project;
- viii. The roll-out of the Council's neighbourhood-based Safe and Healthy Streets schemes across this area, delivering through-traffic reduction and other Healthy Streets measures;
- ix. The Camden High Line, a 1.2km long elevated walkway that will link King's Cross and Camden Town;
- x. The delivery of an Integrated Care Hub;
- xi. The delivery of the Bloomsbury Green Corridor, a project to create a pedestrian friendly network of green links between existing open spaces, institutions and transport hubs, providing a vital element in the connection between Euston and the River Thames with the aim of creating a more climate resilient environment;
- xii. The delivery of sustainable drainage and urban greening measures; and
- xiii. Delivering new and enhanced areas of public open space and play facilities and improving access to nature in the South of the borough, in line with Policy SC3 (Open Space).

**3.12** Information on key infrastructure programmes and projects in the South of the borough are set out in Appendix 1.

## Hatton Garden Jewellery Industry Area

**3.13** The Hatton Garden area is a historic jewellery quarter within London and the centre of the diamond trade in the UK and contains a number of small light industrial workshops and specialist jewellery retailing functions, making it an important contributor to Camden's creative industries. Ground floors along main frontages are dominated by jewellery retail uses. Around three-quarters of businesses deal with suppliers, makers and institutions in the Hatton Garden area highlighting the tight interdependencies between the businesses involved. Hatton Garden is formally designated as a specialist area on the Local Plan Policies Map given its role and character.

**3.14** The Council's Economic Needs Assessment found that the jewellery industry in Camden had overall experienced growth in recent years with over 530 businesses today in this cluster. However, it also notes concerns about the continued pressure from non-jewellery-related uses able to pay significantly higher rents. The ability to deliver significant additional floorspace is challenging without the conversion of existing office space. The small size of many businesses also limits opportunities for acquiring specialist jewellery skills.



## Policy S2 - Hatton Garden Jewellery Industry Area

- A. The Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses in the Hatton Garden area. We will also resist the development of business premises and sites for a non-business use.
- B. The Council will consider the development of premises or sites that are suitable for continued use as jewellery workshops provided that:
  - i. The level of jewellery workshop space is increased or at least maintained; and
  - ii. Existing businesses on the site are retained as far as possible.
- C. Where proposals in Hatton Garden would increase the total gross internal area by more than 200sqm, we will seek 50% of the additional floorspace as affordable premises at 50% below market value for equivalent jewellery-related uses in the Hatton Garden area.
- D. To protect the concentration of specialist jewellery, we will seek the retention of retail uses in the primary shopping area.

- 3.15** The Council will generally seek to resist the loss of viable jewellery workshop space. The conversion of premises will only be permitted where it can be demonstrated that they have been vacant and marketed for at least 12 months based on realistic rents for jewellery-related uses and where development of the site retains premises suitable for use as jewellery workshops as well as other appropriate uses. The marketing exercise must be specifically targeted towards the jewellery industry and through appropriate media.
- 3.16** We will use planning obligations and conditions to ensure that premises provided for jewellery uses are suitable in terms of design, layout and affordability. There are a variety of workspace types occupied by jewellery businesses. Some manufacturing processes rely on the use of heavy equipment and gas extraction. Good natural light can also be critical. The cost of fit out will therefore be taken into account during the negotiation process as well as the period at which any discounted rent applies.
- 3.17** Where development would increase total gross floorspace by more than 200sqm, we will seek 50% of additional floorspace as affordable premises: in line with Policy IE4 (Affordable and specialist workspace) rents should be no more than 50% of the average for equivalent jewellery-related uses in the Hatton Garden area, however we will seek to negotiate the greatest discount to market rents that is viable.
- 3.18** Where workspace cannot be secured due to the nature of the site or the development, we will seek a financial contribution towards support for the jewellery industry, the level of contribution will be related to the area of workspace that would otherwise have been delivered in Hatton Garden. The requirement to provide workspace will take into account the current supply of space in the area.
- 3.19** The area has an important specialist retail function focussed at ground floor level around Hatton Garden (the street) and its immediate side streets. The Council will support proposals that retain links with the jewellery industry.

## Bloomsbury Campus Area

- 3.20** The Bloomsbury Campus Area extends over 22 hectares between Euston Station and the British Museum and contains a concentration of University related buildings and activities. The area is at the heart of higher education in Camden, providing the main base for the University of London and several member institutions including UCL (University College London), SOAS (the School of African and Oriental Studies), London School of Hygiene and Tropical Medicine and Birkbeck.
- 3.21** The University provision in the Campus Area is complemented by many higher education institutions and facilities in other parts of the borough, such as the Royal Veterinary College and Central St Martins (University of the Arts), located north of St Pancras and King's Cross stations respectively. Most of Camden's purpose-built student accommodation is also outside the area.

### Policy S3 – Bloomsbury Campus Area

- A.** The Plan's objectives for the Bloomsbury Campus Area are that it should:
- i.** Maintain and expand its role as the heart of higher education in Camden;
  - ii.** Provide attractive and stimulating spaces for learning, research, sharing ideas, socialising, and supporting students; and
  - iii.** Feel welcoming and inclusive to students, workers, residents and visitors.
- B.** The Plan's priorities for development in the Campus Area are to:
- i.** Consolidate and increase academic space (including student support facilities and other ancillary space) in a way that celebrates the Universities' achievements and creativity and supports the Plan's other priorities for the Campus Area;
  - ii.** Deliver sustainable growth through collaboration across institutions to mitigate and adapt to climate change, upgrade the decentralised energy network, and reduce carbon dioxide emissions;
  - iii.** Enhance the area's rich historic and architectural character, and respect its many heritage assets;
  - iv.** Enhance open space, streets and footpaths, creating a coherent network which is publicly accessible and animated by cafes and restaurants wherever possible and appropriate;
  - v.** Make it easier to walk and cycle within and across the area, reducing the impact of motor vehicle traffic and parking, improving east-west links, enhancing Malet Street as a University High Street, and supporting a central focal point at Byng Place;
  - vi.** Design improvements to public spaces and walking and cycling routes to integrate with the design of the West End Project; and
  - vii.** Seek provision of multi-purpose facilities that are shared with other organisations and the local community as far as possible.
- C.** Where higher education development is proposed in the Campus Area for the University of London or its member institutions, the Council will not require the inclusion of self-contained homes provided the development is publicly funded

or serves a public purpose. We will support the development of student housing in the Campus Area to serve the University of London or its member institutions where it will not compromise meeting the need for additional academic space.

- D.** Development in the Bloomsbury Campus Area, including the development of allocated sites, must contribute to the Plan's objectives and priorities set out above where these are relevant to the development and commensurate with its nature and scale.

## Objectives for the Campus Area

- 3.22** Higher education is a major contributor to the economy in Camden and London, both directly and through its influence on other activities (e.g. attracting international businesses and generating new start-up firms). Camden's universities are a key component of the Knowledge Quarter and are a major factor in the growth of the science and creative sectors.
- 3.23** The higher education sector in Camden has been expanding rapidly in recent years, and we anticipate that it will continue to do so. The University of London's Area Framework estimates that it needs an additional 74,000 sqm of floorspace in Bloomsbury up to 2036, including 31,500 sqm for the Bloomsbury institutions in the next 5 years, and acknowledges that a proportion of the overall need may have to be met elsewhere (University of London Report January 2016). The Area Framework also projects that the number of staff and students will grow by almost 50% up to 2036.
- 3.24** Given the importance of the University and the higher education sector to the Camden economy, a key objective of Policy S3 is for the Campus Area to maintain its higher education role. The Council aims to facilitate additional provision in the Campus Area, whilst recognising that there are many higher education institutions and facilities in other parts of Camden and acknowledging that all the needs of the sector cannot be met within the Campus Area. Consequently, the Council will also support development to meet higher education needs elsewhere in the Knowledge Quarter and in other parts of the borough, subject to compliance with relevant development plan policies and any other relevant material considerations.
- 3.25** The continued success of the University relies on its ability to attract students, including a high proportion of international students, in a highly competitive global marketplace. With continued rapid expansion in student numbers, ensuring that learning and social spaces still work well for students will become increasingly challenging. The second objective of Policy S3 is therefore concerned with providing places that meet student needs.
- 3.26** There is a significant housing population in the Campus Area, including several hundred students living in halls managed by the University or its constituent institutions, although housing density is much lower than in neighbouring areas. In the daytime and evening, the Campus Area hosts many additional students who live elsewhere, and workers associated with the University or other nearby employers.

**3.27** The area is also popular with visitors attracted by the British Museum, other historic buildings, London Squares and the concentration of hotels around Woburn Place and Southampton Row. Each of these groups supports a distinct range of shops, cafes, restaurants and services, while adding to the demands on streets, footpaths, open spaces, and community and leisure facilities. The third objective of Policy S3 is therefore concerned with delivering an area that works for residents, workers and visitors as well as students.

### **Priorities for development in the Campus Area**

**3.28** Policy S3 incorporates a number of priorities drawn from University produced Area Frameworks, including those relating to academic space, open space, sustainability, streets and footpaths, a University High Street, walking and cycling, and the area's historical and architectural character. We will expect development in the area to contribute to these priorities as far as possible, for example by increasing the visibility of teaching, learning, and creative spaces, by improving the landscaping of poor quality places such as the north end of Torrington Square and the margins of Woburn Square (for example, by removing hard surfaces, barriers and car parking, and enhancing planting and paving materials), and by increasing the level of public access to privately owned open spaces such as Malet Street Gardens.

**3.29** The University Area Framework and zero-carbon estates handbook which identify sustainability as a key objective, are consistent with the priority given to sustainable growth in Policy S3 and provide catalysts for collaboration between member institutions to tackle climate change. The University and member institutions have formed the Bloomsbury Heat and Power Consortium, which operates a combined heat and power network (a decentralised energy network) and is planning to upgrade and expand the existing plant as one way of reducing carbon dioxide emissions. The sustainability and climate change requirements of the Local Plan and the London Plan will be applied to proposals in the Campus Area having regard to its particular characteristics and requirements.

**3.30** The high priority given to the historic and architectural character of the Campus Area reflects its location wholly within the Bloomsbury Conservation Area, and the wealth of listed buildings it contains, including large academic buildings and terraces of nineteenth century houses (many of which now have University-related uses). The Campus Area also encompasses a number of public and private open spaces, including Woburn Square and Gordon Square Garden, which are London Squares with statutory protection. The north-eastern portion of the Campus Area is in the background of the London Plan landmark viewing-corridor from Greenwich Park (the General Wolfe Statue) to St Paul's Cathedral, and forms part of the wider setting consultation area for the view. Development in the Campus Area should therefore accord with the design and heritage requirements of the Local Plan, preserve, or where possible enhance, the historic environment and heritage assets, adopt high quality design and materials, and respect local context and character, including the form, scale, mass and rhythm of existing buildings in the townscape.

**3.31** The West End Project is a programme of works to the public realm west and south of the Campus Area, including works to Gower Street, which is currently

nearing completion. The Project aims to create more people friendly streets with less traffic, lower traffic speeds, wider pavements and better public spaces. Improvements in the Campus Area to walking and cycling routes and the public realm will create an opportunity to reduce the impact of motor vehicle traffic and parking and extend the Project's principles by integrating the design of streets and spaces from Tottenham Court Road to Bedford Way. Enhancement measures could include removing intrusive car-parking and any unnecessary street furniture, rationalising short-stay cycle parking in the public realm, and providing covered and secure cycle-parking for long stays in locations that minimise its impact.

- 3.32** The Local Plan and the London Plan encourage multiple or shared use of educational facilities to provide access to the wider community and for social, cultural and leisure activities. In the Campus Area, the Council will encourage higher education development that includes multi-use facilities to serve residents, workers and visitors as well as students, and potentially provide a source of income.

### **Housing in the Campus Area**

- 3.33** Camden's planning policies identify self-contained housing as our priority land use across the borough. However, given the existing concentration of higher education in the Campus Area, the benefits of co-locating University facilities, and the high value/ limited supply of land, the Council will give a high priority to development of academic and ancillary facilities for the University of London. Consequently, Policy S3 indicates that in specific circumstances we will not seek the inclusion of self-contained homes as part of development in the area.
- 3.34** Around a fifth of London's higher education students attend institutions in Camden, but we estimate that less than 1% live in the Campus Area. Additional student housing would benefit the Area by increasing its sustainability and the levels of out-of-hours activity. These benefits do not outweigh the high priority we give to academic facilities for the University of London, however Policy S3 indicates that we will support proposals for student housing in specific circumstances provided academic needs can also be met. Where these circumstances apply, we will also support suitable mixed-use proposals for academic space and student housing.

### **Site Allocations**

- 3.35** A number of site allocations are proposed in the south of the borough, and these are identified on Map 3 and listed in the table below.

## Map 3 – Proposed Site Allocations in the South of the borough



**Table 1 – Proposed Site Allocations in the South of the borough**

Site Reference	Previous Policy Reference*	Site Name
S4	(CSP2)	120-136 Camley Street
S5	(CSP3)	104-114 Camley Street and Cedar Way Industrial Estate
S6	(CSP4)	Parcelforce and ATS Tyre Site
S7	(CSP5)	St. Pancras Hospital
S8	(CSP6)	Shorebase Access
S9	(CSP7b)	Bangor Wharf and Eagle Wharf
S10	(IDS1)	Network Building and Whitfield Street
S11	(IDS2)	Former Tottenham Mews Day Hospital
S12	(IDS15)	Former Royal National Throat, Nose and Ear Hospital
S13	(IDS16)	Belgrove House
S14	(IDS17)	Former Thameslink Station, Pentonville Road

S15	(IDS18)	Land at Pakenham Street and Wren Street
S16	(IDS19)	Land to the rear of the British Library
S17	(HCG2)	Former Central St Martins College
S18	(HCG3)	Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street
S19	(HCG4)	135-149 Shaftesbury Avenue
S20	(CSP7a)	Agar Grove Estate
S21	(CSP7c)	St. Pancras Commercial Centre, Pratt Street
S22	(CSP7d)	6 St Pancras Way
S23	(HCG5a)	Tybalds Estate
S24	(HCG5b)	294-295 High Holborn
S25	(HCG5c)	156-164 Gray's Inn Road
S26	(HCG25e)	8-10 Southampton Row
S27	(HCG25f)	60-67 Shorts Gardens & 14-16 Betterton Street
S28	(HCG5h)	Cockpit Yard and Holborn Library
S29	(HCG5j)	18 Vine Hill and 15-29 Eyre Street Hill
S30	(IDS20a)	Middlesex Hospital Annex, 44 Cleveland Street
S31	(IDS20x)	Central Somers Town
S32	(new)	Chalton Street, Godwin and Crowndale Estate
S33	(BC2a)	Birkbeck College, Malet Street
S34	(BC2b)	Senate House (NW quadrant), Malet Street
S35	(BC2c)	20 Russell Square

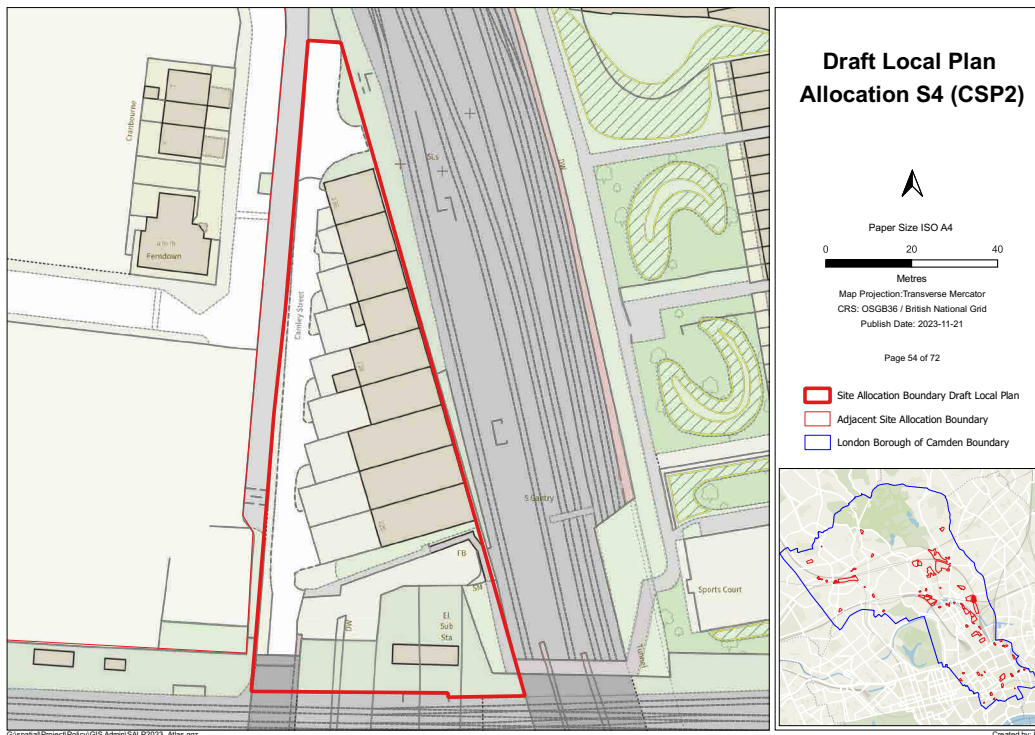
\*Previous policy reference used in the draft Site Allocations Local Plan 2020

**3.36** Site allocations for the Euston area are identified in the Euston Area Plan, which is currently under review.

**3.37** Policies to guide the development of these sites are set out below. Where indicative housing capacities are identified for sites, it is important to note that these are not fixed figures that must be adhered to exactly. A larger number of homes may be supported where it is shown that this 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, and 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.

## ALLOCATION S4 (CSP2) – 120 – 136 Camley Street

### SITE PLAN



### ADDRESS

120 -136 Camley Street

### AREA

0.5 hectares

### ALLOCATED USE

Employment (including light industrial, maker spaces, offices)  
permanent self-contained homes

### INDICATIVE CAPACITY

110 additional homes

### DESCRIPTION OF EXISTING SITE

The site is currently occupied by nine small scale workshop units sitting below street level, occupied by garages / car repairers. The site sits alongside Agar Grove Estate which is being redeveloped and an important north south cycle route. The site's current level, layout and design does not reflect its location at the northern end of Camley Street. Two viewing corridors, identified in the Mayor's London View Management Framework SPG, cross the site.

### BACKGROUND

- The Camley Street Neighbourhood Plan (2021) recognises the potential for development on this site and adjacent sites and sets out core objectives for redevelopment of this area and planning policies that apply to proposals for development.
- Regard must be paid to the objectives set out in the adopted Canalside to Camley Street Supplementary Planning Document (2021), which envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.



## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) intensify the employment floorspace on site, with no net loss;
- b) use efficient design to allow co-location of housing with other proposed uses, ensuring that the introduction of non-employment uses does not compromise the operation of the employment functions;
- c) optimise the provision of additional homes which should form at least 50% of all additional floor area (GIA) proposed, potentially assessed in conjunction with the development of 104-114 Camley Street and Cedar Way Industrial Estate (Allocation S5);
- d) make provision for particular housing needs identified by Policy H6C where appropriate, and consider inclusion of affordable housing for older people, or other people with care or support requirements, as part or all of the affordable housing contribution;
- e) minimise the impacts of operational vehicles, parking and servicing on existing streets by coordinating and incorporating shared access points and off street parking servicing arrangements with compatible neighbouring uses;
- f) embrace its role as a gateway location and seek to create a stronger entrance into the wider area, promote a strong sense of arrival helping to draw more people into and through the area; and
- g) seek to provide a larger biodiversity corridor along the North London Line at York Way to enhance the Grade 2 SINIC.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 42m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## INFRASTRUCTURE REQUIREMENTS

Development must:

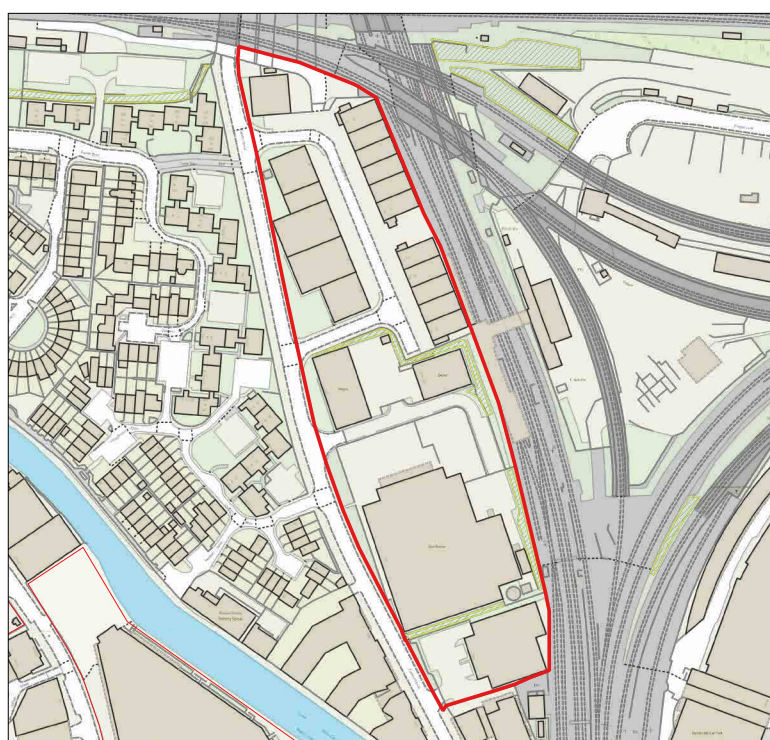
- h) contribute towards public realm and connectivity enhancement projects along Camley Street to strengthen it as a key route for cyclists and pedestrians including:
  - i. provision of a new public space and urban greening to improve the arrival experience from Agar Grove and approach from the south under the adjacent bridge.
  - ii. new or improved pedestrian and cycle route to Maiden Lane estate.
  - iii. improvements to the North Camley Street bridge underpass including opportunities to open up adjacent railway arches.
- i) safeguard a future access point to the Camden High Line.

## OTHER CONSIDERATIONS

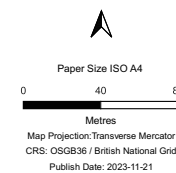
- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where this work has recently been undertaken.

## ALLOCATION S5 (CSP3) - 104 – 114 Camley Street and Cedar Way Industrial Estate

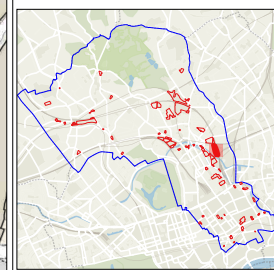
### SITE PLAN



### Draft Local Plan Allocation S5 (CSP3)



- Site Allocation Boundary Draft Local Plan
- Adjacent Site Allocation Boundary
- London Borough of Camden Boundary



<b>ADDRESS</b>	104 Camley Street, 108 – 114 Camley Street and Cedar Way Industrial Estate, 3- 30 Cedar Way
<b>AREA</b>	2.5 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes, and employment (including research and knowledge based uses, light industrial, maker spaces, offices)
<b>INDICATIVE CAPACITY</b>	A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2. This has been estimated at 750 additional homes, but should relate to the scale of all additional floor area (GIA) proposed, and potentially be assessed in conjunction with the development of 120 – 136 Camley Street (Allocation S4).

<b>DESCRIPTION OF EXISTING SITE</b>	The site is within the Knowledge Quarter and located between Camley Street to the west and railway lines to the north and east. The 120 Camley Street site and the Agar Grove Estate lie to the north. There are some recently developed sites to the south that contain a mix of self-contained homes and student units alongside retail and work spaces focused on small business incubator and move-on spaces. The site is a non-designated industrial area occupied by low rise commercial units of varying condition and is currently home to a range of uses including food processing and supplies, designers, heating and plumbing supplies, wholesale warehousing and distribution, IT services and offices. Two viewing corridors, identified in the London View Management Framework SPG, cross the site.
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**BACKGROUND**

- The Camley Street Neighbourhood Plan (2021) recognises the potential for development on this site and adjacent sites and sets out core objectives for redevelopment of this area and planning policies that apply to proposals for development.
- Regard must be paid to the objectives the adopted Canalside to Camley Street Supplementary Planning Document (2021), which envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.
- The Council is in the process of appointing a Development Partner for the northern part of this site.
- Landowners should collaborate across the allocated site to bring forward coherent and integrated redevelopment proposals that come together to create unified and well-designed places. The Council recommends the use of tools such as master planning, design codes, common design principles, or joint outline permissions for the entire allocated site.

**DEVELOPMENT AND DESIGN PRINCIPLES**

- Development must:
- a) demonstrate that individual parcels have been prepared as part of a coordinated integrated plan for the entire allocated site with involvement from relevant landowners and key stakeholders;
  - b) be designed so that new housing, employment and other appropriate uses can function as compatible neighbours;
  - c) provide a variety of employment spaces and facilities that meet the needs of both existing and new business uses, such as light industrial, designer/ makers, creative industries, research and knowledge based uses, and other industrial uses that support the local and CAZ economies and enable the optimal housing capacity to be achieved;
  - d) make provision for particular housing needs identified in Policy H6C where appropriate, and consider inclusion of affordable housing for older people or other people with care or support requirements, as part or all of the affordable housing contribution;
  - e) respect and reinforce the qualities of Camley Street, characterised by being wide and lined by mature trees, through more active frontages addressing the street and urban greening;

- f) establish a series of integrated new routes and spaces of different forms and functions across the site including places to relax, play and grow food;
- g) explore opportunities to unlock east – west connections, enhancing links between other developments, neighbourhoods and new homes and employment spaces and improving access to nearby community and health facilities;
- h) ensure that proposals for the redevelopment of this site appropriately consider their impact on the railway and its operations; and
- i) seek to provide a larger biodiversity corridor along the North London Line at York Way to enhance the Grade 2 SINC.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 15m to 62m outside the LVMF viewing corridor and 15m – 45m inside the LVMF viewing corridor considered the potentially appropriate height range. Additional height, above these potentially appropriate height ranges, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

### **INFRASTRUCTURE REQUIREMENTS**

Development must:

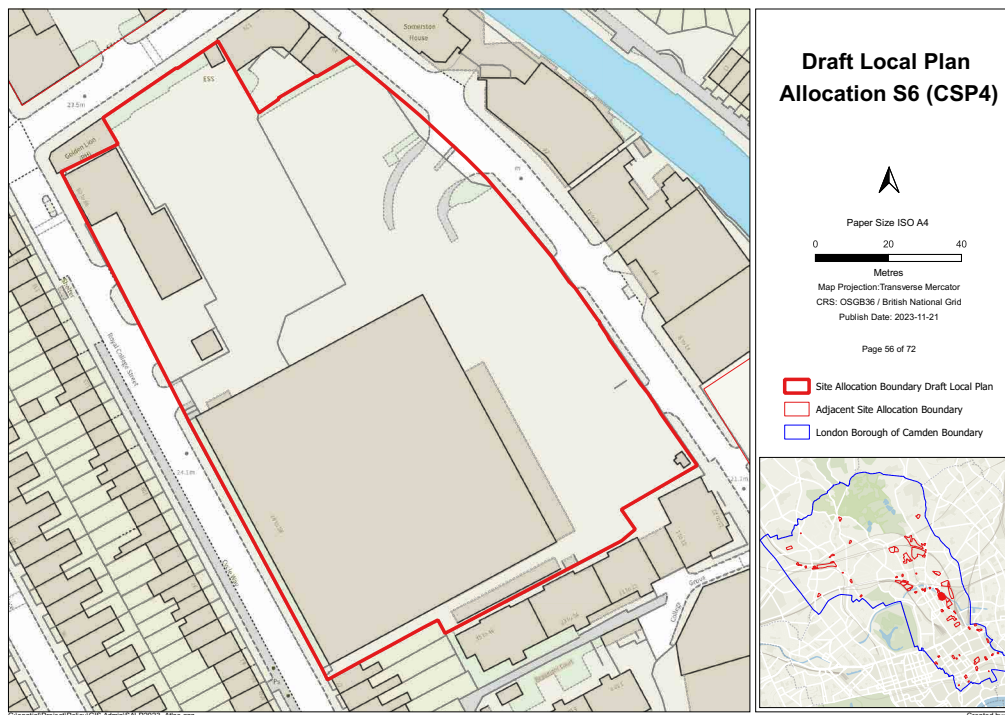
- j) contribute towards public realm and connectivity enhancement projects along Camley Street including:
  - i. the provision of a new and improved public realm and spaces to improve the arrival experience into Camley Street: from Agar Grove, Barker Drive and approaches from the south.
  - ii. Using existing and new trees and urban greening to strengthen Camley Street as a pleasant, attractive and green walking and cycling route.
  - iii. A new or improved pedestrian and cycle route to Maiden Lane Estate.
  - iv. Improvements to the North Camley Street bridge underpass including opportunities to open up adjacent railway arches.
  - v. creation of a potential new canal crossing to improve connectivity between King's Cross, Camley Street and St Pancras Way.
- k) ensure land is safeguarded to allow a potential future connection under or over the mainline railway to the land to the east of the site.

### **OTHER CONSIDERATIONS**

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required.
- There is a critical trunk sewer running through this site which would need to be appropriately considered through the planning and design stage.

## ALLOCATION S6 (CSP4) – Parcelforce and ATS Tyre Site

### SITE PLAN



<b>ADDRESS</b>	24- 86 Royal College Street
<b>AREA</b>	1.53 hectares
<b>ALLOCATED USE</b>	Employment (including research and knowledge based uses) and permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	280 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	<p>The site sits between Royal College Street and St Pancras Way, which are both busy north to south vehicular routes through the area. The majority of the site has been used as a parcel sorting office and depot for many years in a large two storey building with a substantial yard/ car park. Whilst the existing buildings are not within a conservation area and are not identified as a heritage asset, the site is in close proximity to Regent’s Canal and King’s Cross St Pancras Conservation Areas. A number of properties on Royal College Street and Pratt Street are Grade II listed.</p> <p>The north west corner of the site was formerly used for car maintenance and MOT operations. This has now been demolished.</p>

### BACKGROUND

- Parcel Force will vacate the site in 2025 when they move to a new site in Tottenham.
- Regard must be paid to the objectives the adopted Canalside to Camley Street Supplementary Planning Document (2021), which envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and the character and appearance of the area.
- Planning permission (2020/0728/P) was granted in February 2021 for the part of the site previously occupied by ATS tyres (80 -86 Royal College Street). The approved use was for a health care facility.
- If the existing planning permission is not implemented the criteria below will be used to determine future planning applications on this site.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) demonstrate that individual parcels have been prepared as part of a coordinated and integrated plan for the entire allocated site with involvement from relevant landowners and other key stakeholders, taking into account neighbouring sites;
- b) intensify employment uses with no net loss alongside the introduction of residential accommodation;
- c) optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area (GIA) proposed;
- d) ensure the design responds appropriately to the adjacent conservation areas and heritage assets;
- e) integrate better with the surrounding area through a permeable layout and finer grain of building blocks and creation of new public routes and spaces through the site;
- f) make provision for particular housing needs identified by Policy H6C where appropriate, and consider inclusion of affordable housing for older people or other people with care or support requirements, as part or all of the affordable housing contribution;
- g) include more active and engaging street level elevations and frontages around the site, particularly those addressing St Pancras Way and Royal College Street; and
- h) use opportunities to set back building lines to accommodate urban greening and street tree planting.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 42m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## INFRASTRUCTURE REQUIREMENTS

Development must:

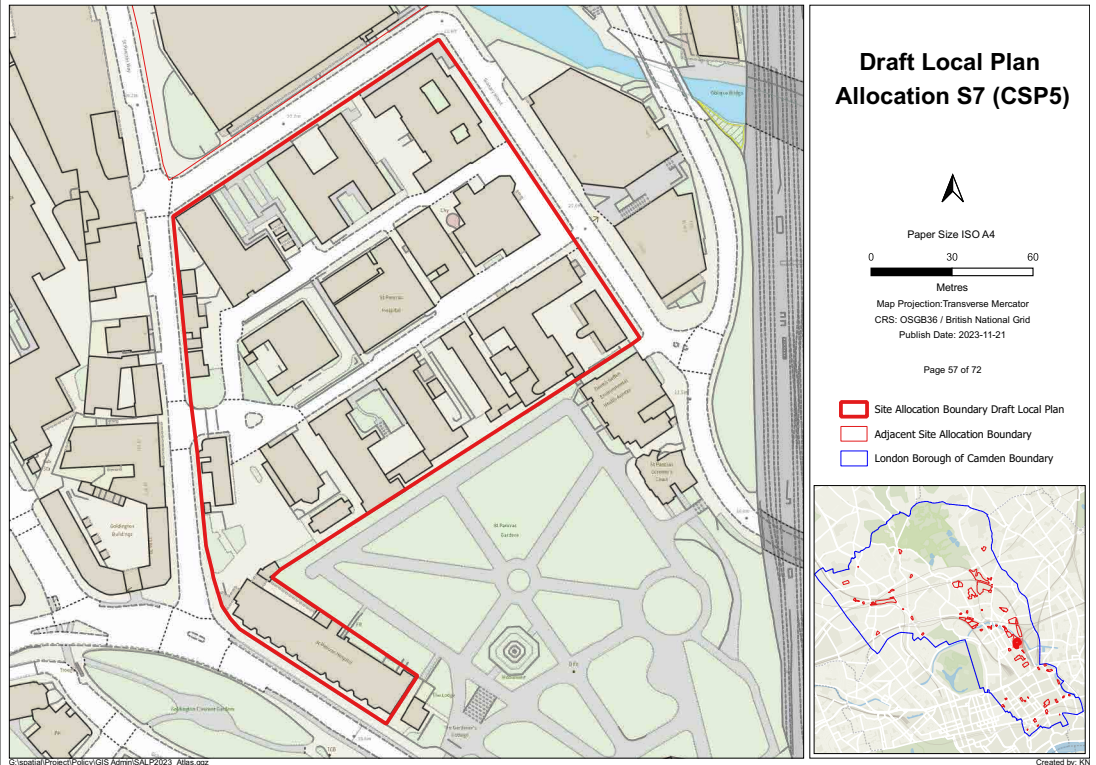
- i) make provision for an inclusive public green space on site, alongside other smaller green and amenity spaces required for proposed uses;
- j) Contribute towards the Camden Cycle way along Pratt Street; and
- k) Contribute towards the creation of a potential new canal crossing to improve connectivity between King's Cross, Camley St and St Pancras Way.

## OTHER CONSIDERATIONS

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where this work has recently been undertaken.

## ALLOCATION S7 (CSP5) - St Pancras Hospital

### SITE PLAN



**ADDRESS** St Pancras Hospital, 4 St Pancras Way, NW1 0PE

**AREA** 2.18 hectares

**ALLOCATED USE** Health, permanent self-contained homes, education, employment (including research and knowledge based uses, light industrial, maker spaces, offices)

**INDICATIVE CAPACITY** 200 additional homes

**DESCRIPTION OF EXISTING SITE** St Pancras hospital sits in a prominent location on St Pancras way, with St Pancras Church and Gardens to the south and to the north is 6 St Pancras Way (formerly referred to as 'Ugly Brown Building') which is under construction. The site is bounded by a long expanse of high walls with access to the Pancras Way frontage and at the rear on Granary Street which links onto Camley Street.

The site is within the St. Pancras Gardens sub-area of the King's Cross and St. Pancras conservation area and adjacent to the Regent's Canal conservation area. [The King's Cross and St. Pancras conservation area appraisal](#) identifies a number of positive contributors within and adjacent to the site. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- Planning permission has been granted (2020/4825/P) on part of the site for a new purpose built facility for Moorfields Eye hospital, University College London and Moorfields eye charity.
- It is important that this use is not planned for in isolation and that proposals to redevelop the wider site are developed in a comprehensive and coordinated way. This will ensure that redevelopment options for development parcels make efficient use of the land available and that design and architectural approaches to the layout of sites, new buildings and the spaces around them are compatible and integrated.
- The continued use of the site for health purposes is supported and the priority for the part of the site not occupied by health facilities is permanent self-contained homes.

- The use of tools such as master planning, design codes, or common design principles for the entire allocated site. This will help to ensure that existing uses are intensified and successfully co-located with new uses including a significant number of new homes and other compatible uses, that well-designed and located new routes and open space are delivered, and that servicing, access points and facilities are shared wherever possible.
- The Conservation Area appraisal notes that the East and West Hospital Wings, Residence Building around the edge of the listed St Pancras Gardens are arguably the most cohesive and important collection of buildings on the site and that the water tower in the central section is a distinct landmark. In line with national and local policy there would be a general presumption in favour of retention of these buildings.

## **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) demonstrate that individual parcels have been prepared as part of a coordinated and integrated plan for the entire allocated site with involvement from relevant landowners and other key stakeholders, taking into account neighbouring sites;
- b) optimise the provision of additional homes and prioritise housing above employment or other non-health related uses;
- c) retain and reuse key buildings of significant heritage or townscape value and the setting and tranquillity of St Pancras Old Church and gardens should be protected;
- d) explore opportunities to create a more active and engaging street edge along Granary Street and onto St Pancras Way;
- e) create new public routes for pedestrians and cyclists including connecting St Pancras Way through to Granary Street, 101 Camley Street and the canal as well as the adjacent 6 St Pancras Way development site to the north of Granary Street;
- f) explore opportunities to integrate landscaping proposals between the north-east corner of the site and public realm spaces created at 101 Camley Street and 6 St Pancras Way to optimise the quality of open space provision and help facilitate canal-side access and views;
- g) reinforce the role of the Granary Street/Camley Street junction as a key gateway location; and
- h) improve the visual relationship to and access from northern Somers Town.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 45 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## **INFRASTRUCTURE REQUIREMENTS**

Development must:

- i) contribute towards the creation of a potential new canal crossing to improve connectivity between King's Cross, Camley Street and St Pancras Way.

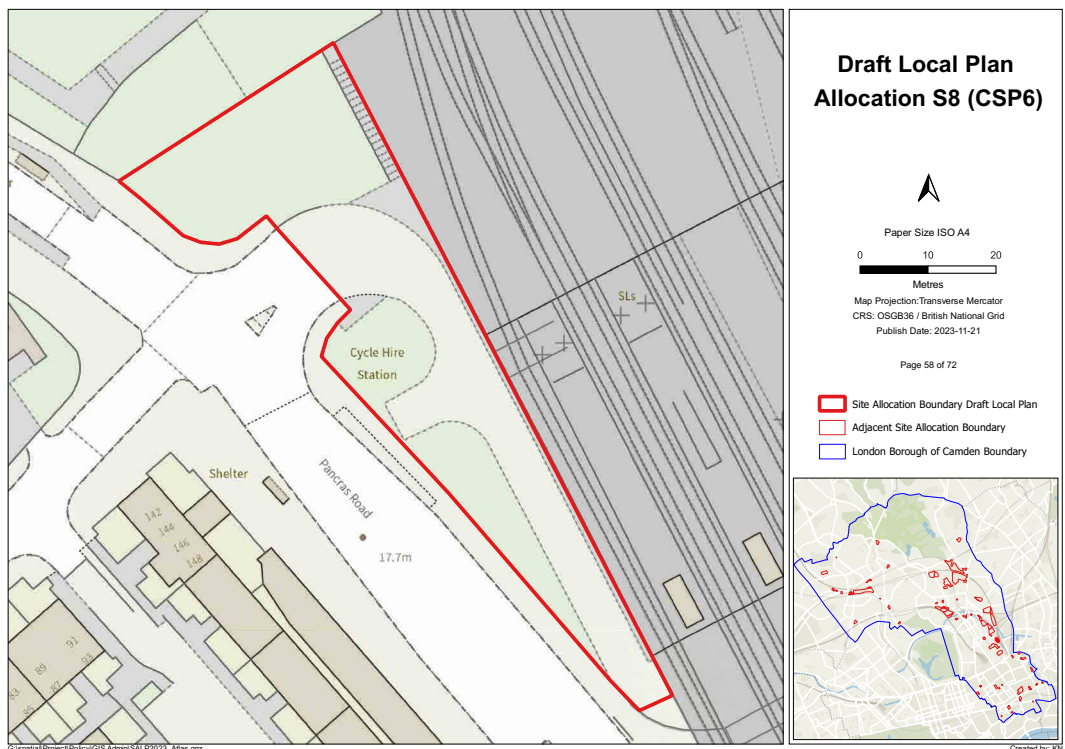


## OTHER CONSIDERATIONS

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where this work has recently been undertaken.

## ALLOCATION S8 (CSP6) - Shorebase Access

### SITE PLAN



<b>ADDRESS</b>	Shorebase Access Land, Pancras Road, NW1 1UN
<b>AREA</b>	0.19 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes, offices
<b>INDICATIVE CAPACITY</b>	40 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site is an undeveloped parcel of land surrounded by large fences and gates. It is currently part covered by grassland and trees and the site is used to access the railway tracks at St Pancras Station to service train operations. Although relatively small in scale, there is the potential for it to be redeveloped and still be used as an access point. There are a mix of uses around the site. Directly opposite there is a series of small-scale retail and business units with housing behind and further along Pancras Road. The site is directly south of St Pancras Old Church and gardens.

## BACKGROUND

- The site is within the King's Cross Conservation Area and the St Pancras Old Church is a grade II\* building and the gardens themselves are grade II listed.
- Although the site is considered a suitable location for both commercial and residential development the land use priority is for the scheme to be housing led.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

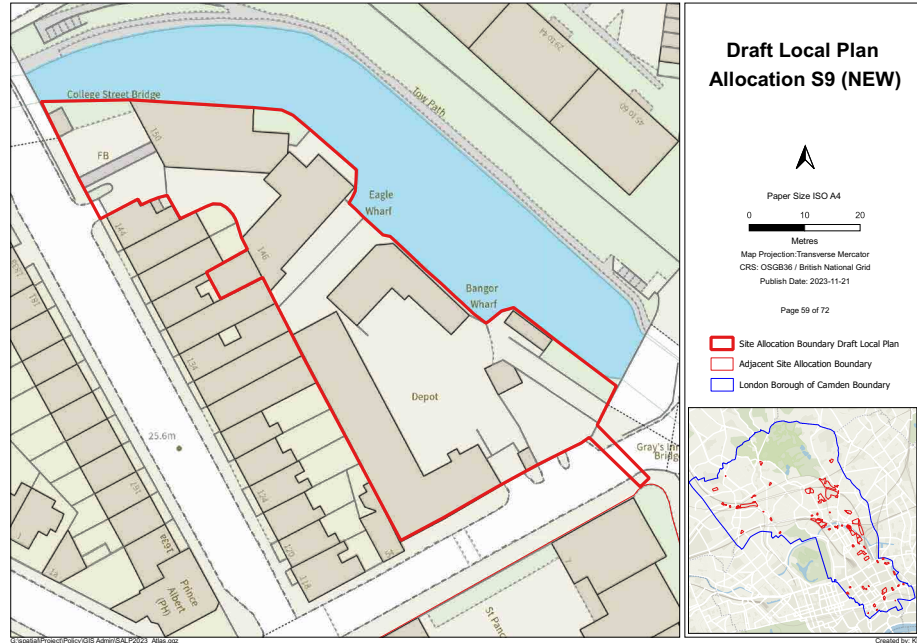
- a) prioritise a housing led scheme, although the site is considered suitable for both commercial and residential;
- b) optimise the provision of additional homes having regard to relevant Local Plan policies including Policy H2, and the scale of additional floor area (GIA) proposed;
- c) respect the view and setting of St Pancras church and gardens by focusing development at the southern part of the site;
- d) retain and enhance the green buffer at the northern end of the site to help preserve and enhance the tranquil nature of the St Pancras Old Church and gardens;
- e) create a more active and engaging street edge addressing Pancras Road; and
- f) ensure that operational access to the Shorebase logistic facility is maintained.

## OTHER CONSIDERATIONS

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where this work has recently been undertaken.

## ALLOCATION S9 (CSP7b) Bangor Wharf and Eagle Wharf

### SITE PLAN



### ADDRESS

Bangor Wharf and Eagle Wharf, Georgiana Street, London NW1 0QS

### AREA

0.25 ha

### ALLOCATED USE

Employment and permanent self-contained homes

### INDICATIVE CAPACITY

50 additional homes

### DESCRIPTION OF EXISTING SITE

The Site (Bangor Wharf and Eagle Wharf) is by the Regent's Canal and next to Gray's Inn Bridge. The site is limited by the canal to the northeast, by Georgiana Street to the southeast and by a row of listed Georgian townhouses along Royal College Street to the southwest. The Site comprises hard standing and a range of buildings. Eagle Wharf is currently occupied as offices and Studios. Bangor Wharf was also being used as offices and storage.

### BACKGROUND

- The site is within the Regent's Canal conservation area and identifies the former forage warehouse at Eagle Wharf and former dock as a positive contributor. It also identifies the extensive granite setts to the depot at Bangor Wharf as traditional materials and features which enhance the Conservation Area.
- The site is immediately adjacent to the Regent's Canal/Grand Union Canal, which is a designated SINIC and Open Space, as well as Green Corridor

## **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) retain and enhance the wharf building at Eagle Wharf, including the retention or reuse of granite setts at Bangor Wharf;
- b) optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area (GIA) proposed;
- c) minimise potential conflicts between residential and other uses;
- d) provide flexible space suitable for a range of employment uses;
- e) provide an active frontage to Georgiana Street;
- f) be of a form and scale which is appropriate to the Regents Canal Conservation Area and responds to the open character of this part of the canal and to surrounding listed buildings, and respects the amenity of neighbouring residents;
- g) take opportunities to utilise the canal for the transportation of goods and materials, both during construction and in the operation of the development;
- h) ensure that the design and layout of the development responds positively to its canal setting, and
- i) explore opportunities to incorporate measures to manage the effects of lighting on the canal, to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.

## **INFRASTRUCTURE REQUIREMENTS**

Development must:

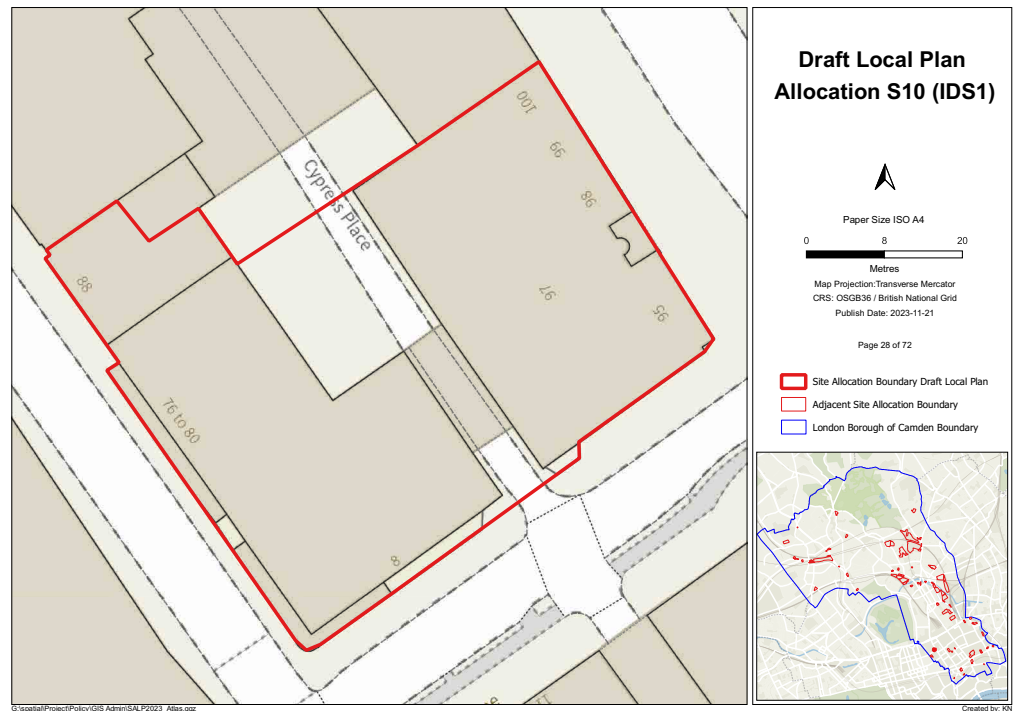
- j) explore potential to help deliver and connect into a local heat network.

## **OTHER CONSIDERATIONS**

There is a critical trunk sewer running through this site which would need to be appropriately considered through the planning and design stage.

## ALLOCATION S10 (IDS1) - Network Building and Whitfield Street

### SITE PLAN



<b>ADDRESS</b>	Network Building, 95-100 Tottenham Court Road and 76-80 Whitfield Street and 88 Whitfield Street, W1T
<b>AREA</b>	0.21 hectares
<b>ALLOCATED USE</b>	Research and knowledge based uses, retail, permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	Replacement of former housing and a contribution to delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2. Total capacity has been assessed as 23 homes (to be delivered off-site) in the context of the development permitted, but should relate to the scale of the former housing and all additional floor area (GIA) proposed.
<b>DESCRIPTION OF EXISTING SITE</b>	The Network Building has now been demolished, but previously provided shops and other retail uses as part of the Tottenham Court Road Central London Frontage, with office uses on the upper floors and fronting Howland and Whitfield Streets. 88 Whitfield Street (also demolished) provided seven permanent self-contained homes. Most of the site is within a viewing corridor set out in the London View Management Framework SPG.
<b>BACKGROUND</b>	
	<ul style="list-style-type: none"> <li>Planning permission has been granted (2020/5624/P) for a wholly non-residential scheme in outline (and two alternative sets of reserved matters) in the context of an acceptable proposal involving off-site housing delivery. If this proposal goes ahead, the site of the former Tottenham Mews Day Hospital (IDS2) will be developed to replace existing homes and provide additional homes.</li> </ul>

- If the planning permission is not implemented, a mixed-use development including housing on this site would still be beneficial, particularly in terms of the level of activity and natural surveillance on the Whitfield Street frontage, and that the case for off-site housing delivery should be considered afresh and the criteria set out below will apply to any future applications on this site.
- The northern part of Fitzrovia is deficient in public open space and the creation of additional open space is a particular priority in this area.

#### **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) include research and knowledge based uses (which could include offices), retail and permanent self-contained housing;
- b) include affordable workspace to mitigate the loss of low cost office space;
- c) not harm the designated strategic view from Parliament Hill, the London View Management Framework will be used to guide the maximum height of development at this site; and
- d) use housing and/ or business entrances and windows to introduce activity and visual interest to Whitfield Street frontage, and seek to respond to the rhythm created by the smaller plot sizes and building-widths found in the wider area, including the nearby Conservation Areas.

#### **INFRASTRUCTURE REQUIREMENTS**

Development must:

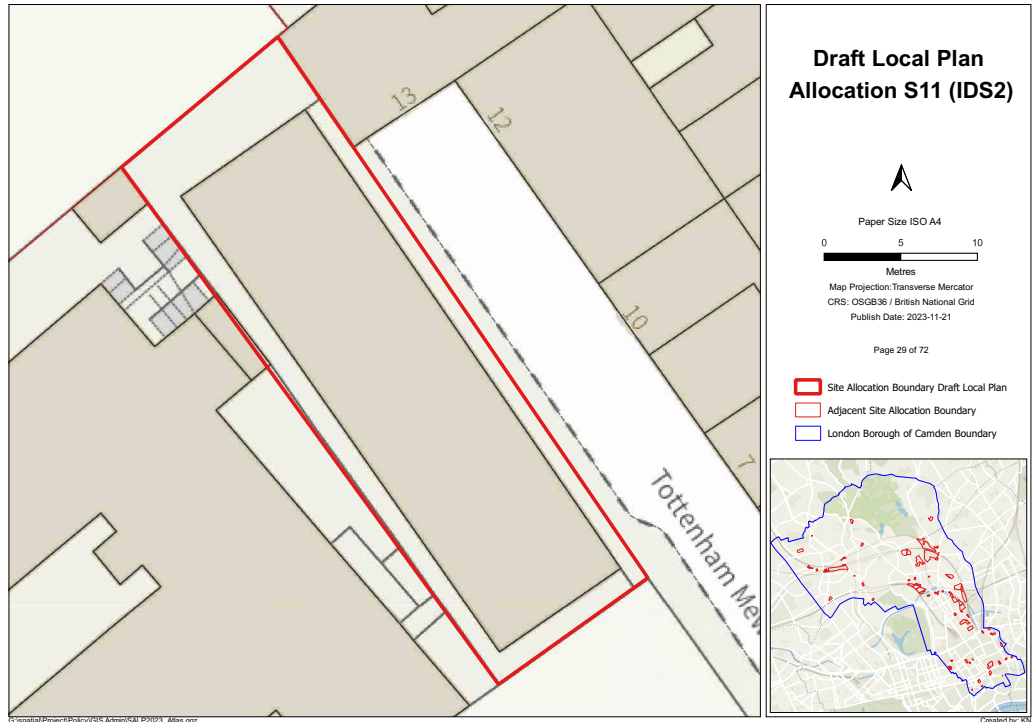
- e) be informed by, and contribute to, a strategic and comprehensive vision for the greening of the public realm and creation of open space in the vicinity. If development of the Network Building is unable to incorporate on-site open space, we will expect a contribution to creating or enhancing publicly accessible open space nearby;
- f) make the eastern end of Howland Street safer and more pleasant for pedestrians and cyclists through measures such as wider pavements and cycle lanes, planting, and alterations to the road to reduce the dominance of motor vehicles; and
- g) look to extend the principles used in the West End project of creating new open spaces through road closure and pavement widening.

#### **OTHER CONSIDERATIONS**

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within the Secondary A Aquifer, should foundation works extend 20m+ below the ground surface, there is a risk that foundations will extend through the London Clay and effect sensitive aquifers therefore a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.

## ALLOCATION S11 (IDS2) - Former Tottenham Mews Day Hospital

### SITE PLAN



<b>ADDRESS</b>	14 – 19 Tottenham Mews, W1T 4AA
<b>AREA</b>	0.05 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes, small scale community, health or office use
<b>INDICATIVE CAPACITY</b>	23 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site is located in Fitzrovia, part of the Central Activity Zone and the former hospital has now been demolished. The facility closed in 2011, but was previously used by the Camden and Islington NHS Foundation Trust for community-based mental health treatment to out-patients. The former Day Hospital had a floor area of 706 sqm (GIA). The site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- The site is allocated for a housing led development.
- Planning permission has been approved for 23 homes and affordable workspace (2020/5633/P) linked to site the Network Building allocation (IDS1)
- Assessment of the development permitted indicated that the former community use on the site had been replaced by alternative forms of provision.
- If the permission is not implemented the Council's preferred alternative use is housing, including the maximum viable amount of affordable housing.
- The criteria set out below will apply to any future applications on this site if the planning permission is not implemented.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) consider including a small scale community or healthcare use, or small scale office (up to the same floor area as the former Day Hospital), in conjunction with a housing-led development. Any larger non-residential use would be likely to harm the character of the Mews and compromise the housing potential of the site;
- b) include windows at street level that provide views into and out of the buildings to enhance community safety and visual interest along the Mews and the pedestrian-cycling routes;
- c) respect the building line established by the adjacent housing block; and
- d) respond to the scale, width and rhythm of the buildings on the opposite side of the Mews, together with their proportions, the size of openings, and the materials used to help to conserve the character of the Conservation Area.

## INFRASTRUCTURE REQUIREMENTS

Development must:

- e) provide a welcoming, spacious and safe pedestrian-cycling connection north-west from Tottenham Mews to join the east-west link from Chitty Street to Foley Street; and
- f) respond to the priority given in Fitzrovia to creation of additional publicly accessible open space. Although it is acknowledged that this is unlikely to be possible on site here. We will therefore expect a contribution to creating or enhancing publicly accessible open space nearby, including space within the wider public realm of streets and footpaths. Proposals should explore extending the streetscape treatment of Bedford Passage through the pedestrian-cycling connection and into Tottenham Mews, and potential to reinstate historic street surfacing and lighting, subject to the servicing requirements of adjacent buildings.

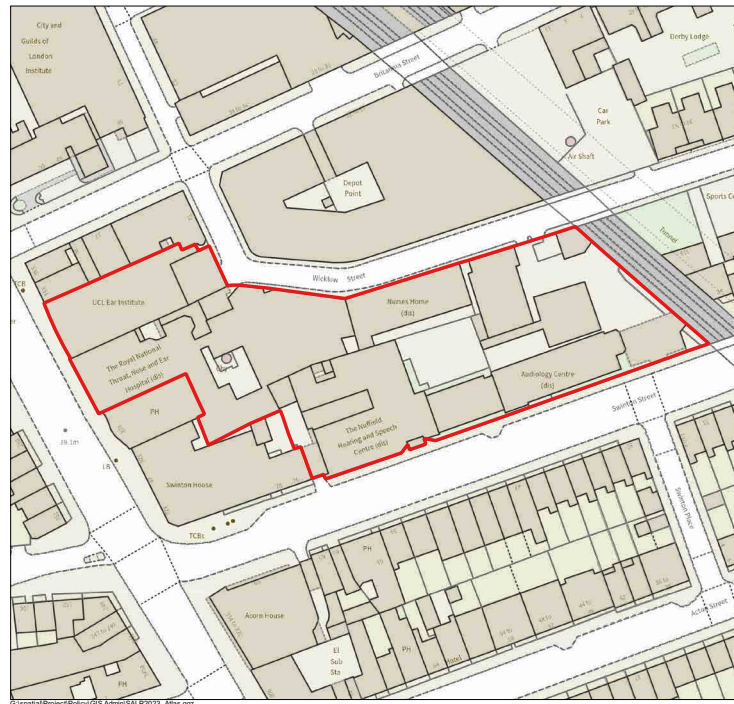
## OTHER CONSIDERATIONS

- If our proposed approach to Tottenham Mews is not feasible, we will encourage contributions from the site to the creation of open space by extending the principles of the West End Project to surrounding streets.
- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within the Secondary A Aquifer, should foundation works extend 20m+ below the ground surface, there is a risk that foundations will extend through the London Clay and effect sensitive aquifers therefore a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.

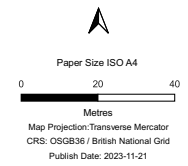


## ALLOCATION S12 (IDS15) - Former Royal National Throat, Nose and Ear Hospital

### SITE PLAN

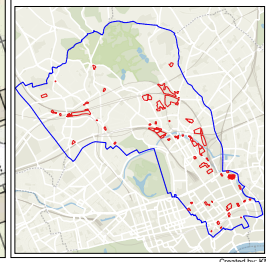


### Draft Local Plan Allocation S12 (IDS15)



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- ▭ Site Allocation Boundary Draft Local Plan
- ▭ Adjacent Site Allocation Boundary
- ▭ London Borough of Camden Boundary



### ADDRESS

330 Grays Inn Road, WC1 8DA

### AREA

0.61 hectares

### ALLOCATED USE

Employment (including research and knowledge based uses)  
permanent self-contained homes

### INDICATIVE CAPACITY

A contribution to delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been assessed as 72 additional homes in the context of the development permitted, but should relate to the scale of all additional floor area (GIA) proposed

### DESCRIPTION OF EXISTING SITE

The site was previously occupied by the Royal National Throat, Nose and Ear Hospital, which has now been relocated to Huntley Street. The site has frontages to Gray's Inn Road, Wicklow Street, Swinton Street and the railways cutting. The area around the site is home to a blend of different uses including retail, offices, hotels and housing. The site is within the Knowledge Quarter. The site is within two different viewing corridors set out in the London View Management Framework SPG.

### BACKGROUND

- Planning permission has been granted for a mixed use office development with lab enabled floors, Self-contained residential homes and a hotel with gym and restaurant use. (2020/5593/P). If an alternative planning application is submitted for this site, it would need to have regard to the provisions of this allocation.
- Planning permission has been granted for development of up to 15 storeys on this site. Suitable heights for any subsequent scheme should be determined through a detailed assessment in accordance with Local Plan policy.
- The site is within the King's Cross St Pancras Conservation Area and Bloomsbury Conservation Area is located on the opposite side of Swinton Street to the south.

- The sites size and location mean that it could accommodate a range of different uses which would add to the vibrancy of the surrounding area and support key industries associated with the knowledge economy.
- If the existing planning permission is not implemented, or is only partially implemented, the criteria below will be used to determine future planning applications on this site.

**DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) be informed by a robust understanding of the context of the site and the merits of existing buildings and/or collections of buildings. Given the historic context of the site and its contribution to the wider conservation area, proposals for demolition/extension or redevelopment of buildings and/or collections of buildings must be clearly justified, and new development must be designed in a way that respects the character of the original building/s, the wider site as a whole and their setting; and
- b) improve permeability across the site and the wider area by creating a meaningful pedestrian route through the site.

**INFRASTRUCTURE REQUIREMENTS**

Development must:

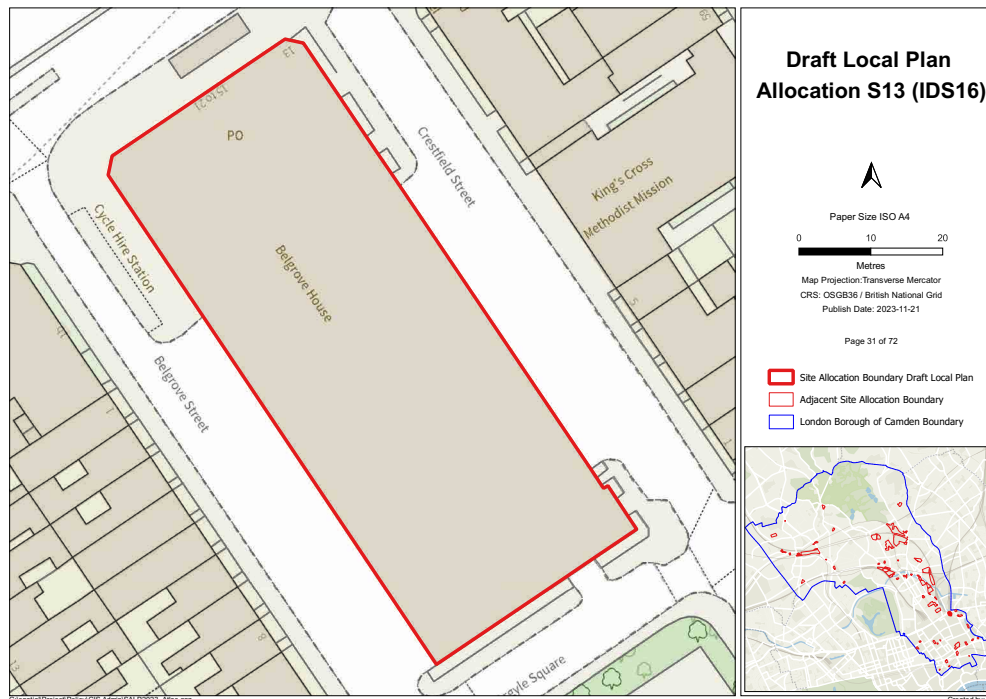
- c) make provision on-site for a pocket park/public amenity space.

**OTHER CONSIDERATIONS**

- This site is located in a Local Flood Risk Zone, as such, a Flood Risk Assessment will be required, in accordance with Policy CC11 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where this work has recently been undertaken.

## ALLOCATION S13 (IDS16) - Belgrove House 13- 21 Euston Road

### SITE PLAN



<b>ADDRESS</b>	Former Belgrove House, 13 –21 Euston Road, King’s Cross WC1H
<b>AREA</b>	0.4 hectares
<b>ALLOCATED USE</b>	Research and knowledge based uses (including offices), self-contained homes
<b>INDICATIVE CAPACITY</b>	A contribution to delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been assessed as 32 additional homes (to be delivered off site) in the context of the development permitted, but should relate to the scale of all additional floor area (GIA) proposed.
<b>DESCRIPTION OF EXISTING SITE</b>	Belgrove House has now been demolished and the site cleared. It is a whole block site that is prominent in visual terms and important in a historical context. It is within the King’s Cross Conservation Area, adjacent to Bloomsbury Conservation Area and is surrounded by a number of listed buildings including Grade I listed King’s Cross Station and St Pancras Chambers. Site is adjacent to Argyle Square which is protected under London Squares Preservation Act 1931.

### BACKGROUND

- Development should be a commercial led mixed use scheme in the heart of the Knowledge Quarter.
- Planning permission has been granted (2020/3881/P) for a scheme with off-site housing delivery for 32 homes on the Acorn House site nearby.
- Planning permission has been granted for development of up to 10 storeys on this site. Suitable heights for any subsequent scheme should be determined through a detailed assessment in accordance with Local Plan policy and would need to demonstrate the benefits outweigh heritage harm.
- If the planning permissions are not implemented a mixed use scheme remains the policy presumption and the requirement for housing and the case for off-site housing would need to be considered afresh having regard to the scale of all additional floor area (GIA) proposed.

## **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) be of exceptional standard of architecture to enhance the setting of the areas rich character, heritage assets including the Grade I stations and open spaces;
- b) provide visual connection and activity on the side streets;
- c) improve the site's relationship with Argyle Square; and
- d) match the building line along Euston Road to allow for improved pedestrian movement.

## **INFRASTRUCTURE REQUIREMENTS**

Development must:

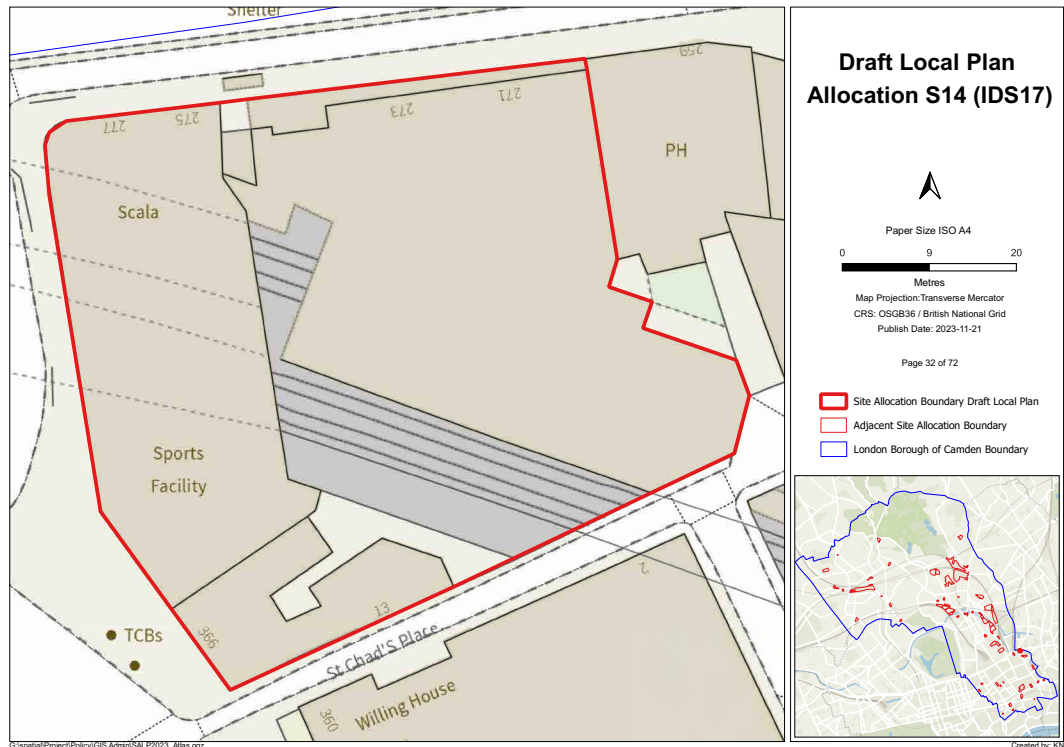
- e) integrate step-free London Underground entrance within the site to enable the removal of the entrance structures to the front of the site;
- f) deliver benefits that make a real improvement to local people's quality of life, including enhanced education and employment opportunities;
- g) include provision of community functions, such as genuinely flexible and affordable space for the local community; and
- h) contribute towards public realm enhancement projects, including significant improvements to pedestrian and cycling environments adjacent to the site.

## **OTHER CONSIDERATIONS**

Opportunities to deliver a direct pedestrian crossing across Euston Road on the east arm of the Belgrove Street junction would be welcomed and should be investigated in consultation with Transport for London, alongside the relocation of the tube entrances

## ALLOCATION S14 (IDS17) - Former Thameslink station, Pentonville Road

### SITE PLAN



<b>ADDRESS</b>	271-273 Pentonville Road, King's Cross, N1 9NL
<b>AREA</b>	0.07 hectares
<b>ALLOCATED USE</b>	Employment (including research and knowledge based uses, maker spaces, offices), permanent self contained homes
<b>INDICATIVE CAPACITY</b>	A contribution to delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been estimated as 12 additional homes, but should relate to the scale of all additional floor area (GIA) proposed.
<b>DESCRIPTION OF EXISTING SITE</b>	<p>The site was formerly a Thameslink station entrance and ticket office. It is within the King's Cross Conservation Area and currently has a single storey building of low architectural merit, with a set back building line. There are railway tracks to the rear of the site at lower level.</p> <p>The site is between the Grade II, three storey Big Chill late night music venue and the Scala music venue and snooker hall on the corner of Gray's Inn Road and Pentonville Road. The site is within two different viewing corridors set out in the London View Management Framework SPG.</p>

### BACKGROUND

- An employment led mixed use development including uses supporting the knowledge economy is considered appropriate.
- If it cannot be demonstrated to deliver acceptable housing on site, no on site housing will be sought.
- If housing is incorporated, it is essential that it does not have a detrimental effect on the operation of the adjoining late night venue. In line with agent of change principles, the party responsible for a change should also be responsible for managing the impact.

## **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) ensure the design respects the adjacent listed building and the Scala building as a positive contributor to the conservation area;
- b) consider including housing on-site if it can be demonstrated to be compatible with the two nearby late night uses, train tracks to the rear and busy nature of Pentonville Road. Applicants would need to clearly demonstrate that development could achieve suitable levels of amenity in terms of noise and air quality;
- c) be designed in line with agent of change principles; and
- d) provide an improved relationship to the street through an active frontage.

## **INFRASTRUCTURE REQUIREMENTS**

Development must:

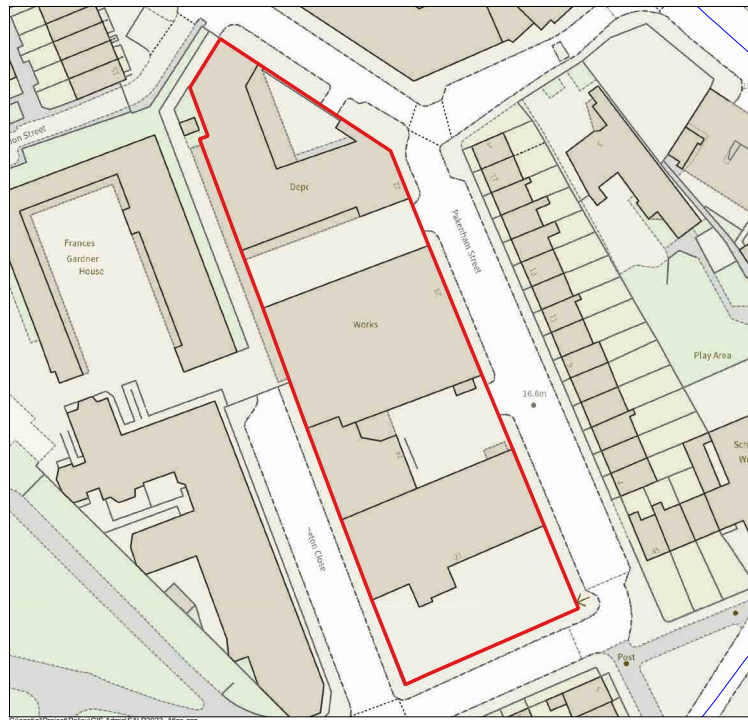
- e) retain an entrance / exit and ticketing area for the London Underground station, although this can be remodelled subject to meeting relevant Transport for London standards.

## **OTHER CONSIDERATIONS**

This site is located in a Local Flood Risk Zone, as such, a Flood Risk Assessment will be required, in accordance with Policy CC11 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.

**ALLOCATION S15 (IDS18) - Land at Pakenham Street and Wren Street**

**SITE PLAN**



**Draft Local Plan  
Allocation S15 (IDS18)**

North Arrow

Paper Size ISO A4

0 10 20  
Metres

Map Projection: Transverse Mercator  
CRS: OSGB36 / British National Grid  
Publish Date: 2023-11-21

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- Site Allocation Boundary Draft Local Plan
- Adjacent Site Allocation Boundary
- London Borough of Camden Boundary

Created by: JCN

<b>ADDRESS</b>	22- 24 Pakenham Street and 21 Wren Street
<b>AREA</b>	0.44 hectares
<b>ALLOCATED USE</b>	Education and/ or Employment uses (including research and knowledge based uses, maker space and offices) and permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	A contribution to delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been estimated at 70 additional homes, but should relate to the scale of all additional floor area (GIA) proposed.
<b>DESCRIPTION OF EXISTING SITE</b>	The site is within the Knowledge Quarter and the Central Activities Zone. This wider area is heavily built up and contains a mix of different uses including offices, retail, hotels and housing. Major development is taking place opposite at the Mount Pleasant Sorting Office and to the west at the Eastman Dental Hospital site. The site is currently occupied by a number of small businesses, including printing, graphic design, video graphics, light manufacturing and offices. The site is within a viewing corridor set out in the London View Management Framework SPG.

## BACKGROUND

- The site was identified in the 2013 Site Allocations Plan as a potential location for a new secondary school. At the time of writing this allocation the most recent pupil place projections for Camden indicate that there is no current need for a new secondary school in this location. The latest pupil place projections figures will be kept under review.
- If education floorspace is not required at the time of submission, the intensification of employment floorspace would be supported and self-contained homes.
- The Bloomsbury Conservation Area is immediately to the south and east of the site, the boundary of which runs along part of the frontage of the site that is bounded by Pakenham Street, Wren Street and Langton Close. 23-24 Pakenham Street, 21 Wren Street and the boundary wall are locally listed and considered to be of architectural, historical and townscape significance.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) consider local educational needs and make provision for educational uses if required;
- b) be informed by a robust understanding of the historic context of the site and the merits of its existing buildings including 23-24 Pakenham Street and 21 Wren Street and boundary wall;
- c) respond to the architectural quality of the adjacent historic terraces on Wren Street and Pakenham Street; and
- d) break down the large size of this block to introduce some east-west permeability for pedestrians and cyclists and link into other routes and spaces being created through redevelopment happening to the west.

## INFRASTRUCTURE REQUIREMENTS

Development must:

- e) improve pedestrian and cycle routes and the public realm around the site.

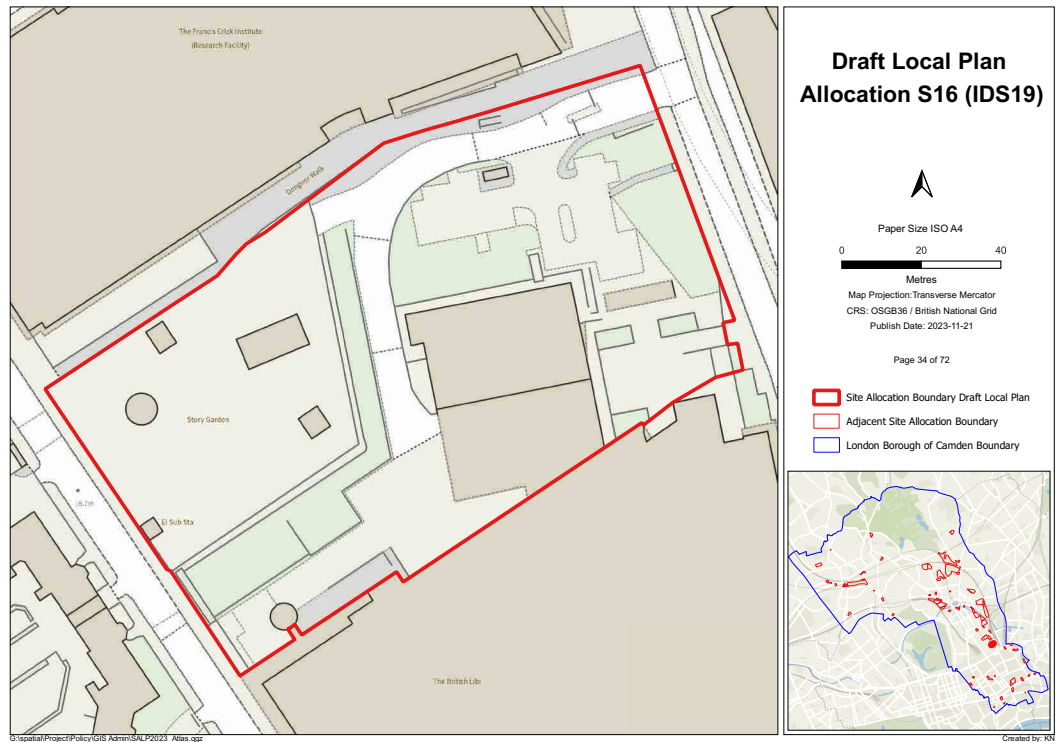
## OTHER CONSIDERATIONS

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within the Secondary A Aquifer. Should foundation works extend 20m+ below the ground surface, there is a risk that foundations will extend through the London Clay and effect sensitive aquifers therefore a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.



## ALLOCATION S16 (IDS19) - Land to the rear of the British Library

### SITE PLAN



<b>ADDRESS</b>	Land to the Rear of British Library, Euston Road
<b>AREA</b>	1.42 hectares
<b>ALLOCATED USE</b>	Cultural, Research and knowledge based uses
<b>INDICATIVE CAPACITY</b>	A contribution to delivery of housing will be expected having regard to relevant Local Plan policies including Policy H2
<b>DESCRIPTION OF EXISTING SITE</b>	The British Library is the national library of the United Kingdom, used by over 1.5 million people each year and gives access to the world's most comprehensive research collection. The site is located to the rear of the library and is at the heart of the Knowledge Quarter, between the British Library, the Francis Crick Institute and close to Central Somers Town and the King's Cross Central development site. Part of the site is occupied by the British Library Conservation Centre. The Centre houses state-of-the-art book conservation studios and sound preservation studios, together with facilities for an extensive training and public outreach programme. The main Library is Grade I listed, the Library Centre for Conservation is a non-designated heritage asset. The site is safeguarded for Crossrail 2 purposes

## BACKGROUND

- The Council has resolved to grant planning permission and listed building consent (2022/1041/P, 2022/1320/L) for a new building for use as a library, galleries, learning, business and events space and retail and commercial spaces.
- If these applications are not granted, or the permissions are not implemented, the Council will support a mixed use development that complements and supports the expansion plans and future service needs of the British library, including cultural, commercial and community uses and in particular uses related to the knowledge and innovation economy.
- The proposed nature and balance of acceptable uses and the extent of any housing requirements on-site (or alternatively off-site) will be considered in the light of competing land use needs, other priorities and relevant policy criteria, including the extent to which proposals are publicly funded and support the investment plans and operational needs of the British Library.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) be welcoming, outward facing and socially inclusive by inviting a diverse range of visitors in and encouraging them to feel a sense of pride and ownership over the community spaces within it;
- b) ensure that the main entrance to the public library facilities is visible from the St Pancras Station entrance on Midland Road. Additional entrance from Ossulston Street should be provided to support links to and public access from communities on all sides;
- c) be of exceptional design quality reflecting the site's prominent and internationally significant location and historic context. Appropriate consideration should be given to the impact of development on existing buildings on the site;
- d) explore opportunities to provide a public facing hub/learning/employment/ resource centre for the Knowledge Quarter;
- e) maximise opportunities for integrating green infrastructure into the fabric of the development. A range of inclusive, easily accessible public open and green spaces that provide opportunities for everyone to relax, reflect and play should be included. Consideration should be given to how roof spaces can support this role and provide a public asset;
- f) make provision for a range of measures that provide strong social value from the development for example by including flexible community space/s that could be used for meetings, social enterprise, informal training and learning, pop-up cafes/shops and exhibitions; and
- g) include the creation of new routes and spaces through the site to make it a more inclusive part of the city and integrate it into the local area are encouraged.

<b>INFRASTRUCTURE REQUIREMENTS</b>
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Development must:
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- |                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>h) ensure that Crossrail 2 infrastructure is incorporated into the design in a manner which responds positively to the public realm; and</li><li>i) ensure the landscaping across the site enhances the East West connection and links to Dangoor Walk</li></ul> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

<b>OTHER CONSIDERATIONS</b>
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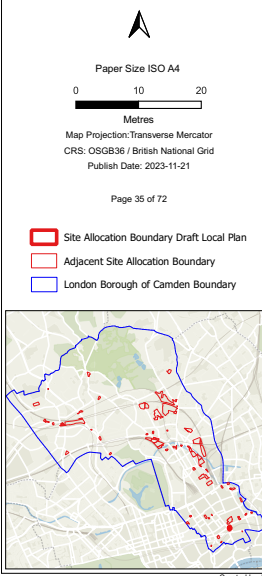
The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC11 (Flood Risk).
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## ALLOCATION S17 (HCG2) - Former Central St Martins College

### SITE PLAN



### Draft Local Plan Allocation S17 (HCG2)



**ADDRESS** Lethaby Building and Cochrane Theatre, 12-42 Southampton Row, 1-4 Red Lion Square, Holborn, WH1B 4AF

**AREA** 0.45 hectares

**ALLOCATED USE** Hotel, permanent self-contained homes, cultural, retail, creative work space

**INDICATIVE CAPACITY** A contribution to delivery of housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been assessed as 34 additional homes in the context of the development permitted, but should relate to the scale of all additional floor area (GIA) proposed.

**DESCRIPTION OF EXISTING SITE** The former Central St Martins College (University of the Arts) is an island site surrounded by Southampton Row to the west, Procter Street/Drake Street/Red Lion Square to the east, Theobald's Road to the north and Fisher Street to the south. The Lethaby building was built as the Central School of Arts and Crafts and is Grade II\* listed. The Cochrane theatre was built later and remained operational till 2012, when Central St Martins College relocated. The western part of the site is located within the Kingsway Conservation Area and the eastern part of the site sits opposite the Bloomsbury Conservation Area. The site has been in meanwhile uses since the college left.

### BACKGROUND

- Planning permission (2020/2470/P) and listed building consent has been granted for a hotel led development scheme, self-contained homes, cultural, maker space and retail uses.
- If the permissions are not implemented a mixed use development will be supported including permanent self-contained residential
- The Cochrane Theatre has a Certificate of Immunity until July 2024 issued by Historic England preventing it from being statutorily listed.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) retain the Grade II\* listed Lethaby Building at 12-42 Southampton Row, ensuring that its fabric and setting are restored and protected to better reveal its heritage significance, and establishing an appropriate and viable use to ensure the building's long-term future;
- b) provide an on-site cultural use, including gallery, exhibition space or other publicly available cultural space;
- c) ensure any new buildings and extensions are of an exceptional architectural quality to respond to the site's sensitive and varied context and range of interfaces, particularly Red Lion Square and the Lethaby Building. Any additional height, scale or massing to the current building on Red Lion Square would need to be sufficiently justified and articulated;
- d) Ensure the height of any proposal is sensitive to the surrounding townscape, conservation areas and listed buildings, in particular the Lethaby building;
- e) create a new public pedestrian route to conform to the historic alignment of the street that led diagonally north-westwards from Red Lion Square, to improve permeability, create a link between Southampton Row and Red Lion Square;
- f) provide active ground floor uses, including retail or front doors and windows that contribute to the life on the street in particular to Procter/Drake Street and Theobalds Road, and other streets where possible; and
- g) consider providing for independent retailers and those serving the local community.

The Council has granted planning permission for a development up to 50m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## INFRASTRUCTURE REQUIREMENTS

Development must:

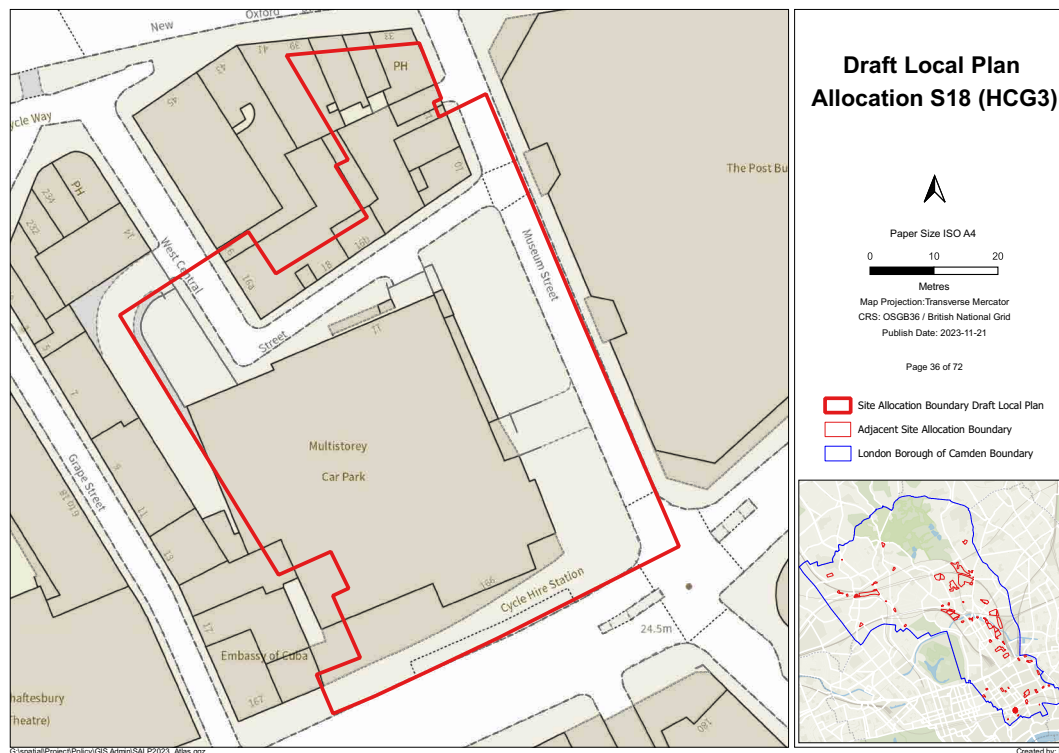
- h) contribute and respond to the public realm improvements planned on all sides of the site including the Holborn Liveable Neighbourhood Scheme

## OTHER CONSIDERATIONS

- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.
- This site is within the Secondary A Aquifer, should foundation works extend 20m+ below the ground surface, there is a risk that foundations will extend through the London Clay and effect sensitive aquifers therefore a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.

**ALLOCATION S18 (HCG3) - Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street**

**SITE PLAN**



**ADDRESS** Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street, WC1A 1LY

**AREA** 0.45 hectares

**ALLOCATED USE** Mixed use including offices, research and knowledge based uses, town centre uses, and permanent self-contained homes

**INDICATIVE CAPACITY** A contribution to delivery of housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been assessed as 10 additional homes in the context of the development with a resolution to grant consent, but should relate to the scale of all additional floor area (GIA) proposed.

**DESCRIPTION OF EXISTING SITE**

The site comprises a number of elements, including a Travelodge hotel and multi storey car park and number 10 –12 Museum Street and 35, 37 and 39 – 41 New Oxford Street and 16A, 16B and 18 West Central Street. 10 – 12 Museum Street and 35 and 37 New Oxford Street are Grade II listed buildings, as are several properties adjoining the site. These listed buildings are also within the Bloomsbury Conservation Area. The buildings on the remainder of site are outside the Conservation Area but the conservation area appraisal notes that their scale and design harm the settings of nearby listed buildings and the wider conservation area.

The previous uses also include retail and nightclub use (ceased operation in 2011), together with offices, 31 homes and 1 house in multiple occupation (approximately 1900 sq metres of residential floorspace) at upper floor levels. Part of the site on West Central Street is vacant.

The site is not within a protected view, but is partly within the background area of the Palace of Westminster as set out in the Mayor’s London View Management Framework SPG.

## BACKGROUND

- The Council resolved to grant planning permission (2023/2510/P) and listed building consent for a mixed use scheme including offices, town centre uses, and self contained homes in November 2023 subject to signing the legal agreement and referral to the Mayor.
- The 2023 applications were submitted following the withdrawal of application 2021/2954/P in response to the Grade II listing of 10-12 Museum Street and 35-37 New Oxford Street by Historic England.
- 39-41 New Oxford Street was granted a Certificate of Immunity until 19 October 2028 by Historic England preventing it from being statutorily listed.
- Buildings within the northern part of the site are allocated in the 2013 Site Allocations (site 18) for mixed use development provided by conversion, extension or partial redevelopment.
- The site is within the Tottenham Court Road Growth Area, designated in the London Plan.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) ensure that a design led approach is taken to delivering the optimum amount of development at the site, and that, where it can be demonstrated that demolition is acceptable in line with Policy CC2 (Repurposing, Refurbishment and Re-use of Existing Buildings) any replacement building is of a height and massing that can successfully integrate with the surrounding townscape;
- b) be designed to respond to the site's varied context, including listed buildings, the setting of specific heritage assets, and the Bloomsbury conservation area;
- c) seek to maximise the delivery of residential floorspace in addition to re-providing the existing residential floorspace;
- d) maximise active ground floor uses, either through retail or front doors and windows that create lively and well-overlooked streets on Museum Street, West Central Street and High Holborn;
- e) explore options for providing a safe and welcoming public route through the site, on the axis with Coptic Street, to create a new route from the British Museum. Active ground floor uses, including shops and restaurants, should be provided along the route, to promote natural surveillance; and
- f) maximise opportunities for high-quality urban greening, in particular along the wide pavement on Museum Street.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 54m considered the potentially appropriate height range. It notes that the Council has resolved to grant planning permission for a development of up to 74m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings, other relevant development plan policies and the London View Management Framework.

## INFRASTRUCTURE REQUIREMENTS

Development must:

- g) contribute and respond to the significant public realm improvements planned for the area, as part of the Holborn Liveable Neighbourhood project, including providing improved public space on Museum Street.

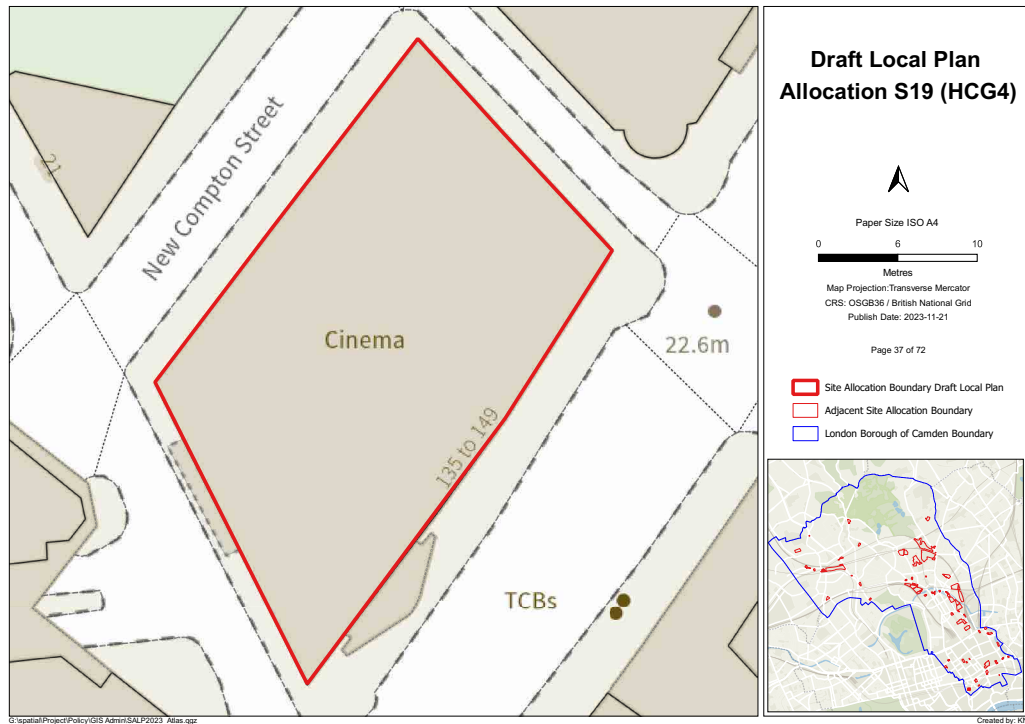
## OTHER CONSIDERATIONS

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding.
- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.
- This site is within the Secondary A Aquifer, should foundation works extend 20m+ below the ground surface, there is a risk that foundations will extend through the London Clay and effect sensitive aquifers therefore a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.



## ALLOCATION S19 (HCG4) - 135 – 149 Shaftesbury Avenue

### SITE PLAN



**ADDRESS** 135 – 149 Shaftesbury Avenue, Holborn, WC2H 8AH

**AREA** 0.08 hectares

**ALLOCATED USE** Theatre / cinema, cultural use

**INDICATIVE CAPACITY** A contribution to delivery of housing off site will be expected having regard to relevant Local Plan policies, including Policy H2.

**DESCRIPTION OF EXISTING SITE** The building at 135-149 Shaftesbury Avenue is Grade II listed and is surrounded by Shaftesbury Avenue, St Giles Passage, New Compton Street and Stacey Street. The Phoenix Community Garden lies to the rear of the site. The building opened in 1931 as the Saville Theatre and was converted to a cinema in 1970. It is currently used as an Odeon Cinema.

### BACKGROUND

- The supply of sites that could accommodate a large-scale cultural venue, such as a theatre, is very limited in the West End and there is continued demand by theatre operators for such venues.
- The site is not within a conservation area but adjoins the Seven Dials (Covent Garden) Conservation Area which covers the south side of Shaftesbury Avenue, and the Denmark Street Conservation Area, which covers the north side of New Compton Street.
- Planning permission (2017/7051/P) and Listed Building consent (2018/0037/L) were refused and dismissed at appeal in March 2021.
- The site is allocated for a cinema or theatre use.

## **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) retain the Grade II listed building and ensure that its fabric and setting are protected, restored and enhanced, particularly the building's distinctive features. A full assessment of the remaining internal historic fabric of the building should be undertaken;
- b) retain the cinema/theatre use and ensure that any other uses introduced on the site do not compromise or restrict the viability or operation of the cinema/theatre;
- c) ensure that the cinema/theatre function is integrated in the building's design, including careful consideration of the location, size and relationship of the screening rooms/stage, to circulation and other public spaces;
- d) only consider alternative public cultural uses if it can be demonstrated to the Council's satisfaction that a cinema or theatre operator cannot be identified;
- e) retain the main, front entrance for the cinema/theatre use, and use side or rear entrances for any secondary uses;
- f) ensure that any roof extension will be of the highest architectural quality to complement and enhance the host building and be of a height and massing that is appropriate to the site's surrounding townscape and responds to the neighbouring conservation areas; and
- g) explore options for activating the blank façades facing St Giles Passage, New Compton Street and Stacey Street, including windows, entrances and active ground floor uses that contribute to the life on the street.

## **INFRASTRUCTURE REQUIREMENTS**

Development must:

- h) contribute to improvements of the public realm around the building to create better-lit routes and encourage activity around the building; and
- i) work with the local community to protect and enhance the setting of Phoenix Gardens.

## **OTHER CONSIDERATIONS**

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding.
- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.

**3.38** The following table identifies further site allocations in the south of the borough, many of which are already subject to planning permission, and sets out key considerations for each site.

Ref*	Address	Allocated uses	Indicative capacity	Key considerations
S20 (CSP7a)	Agar Grove Estate	Permanent self-contained homes	152	Under construction (earlier phases completed)
S21 (CSP7c)	St Pancras Commercial centre	Employment and permanent self-contained homes	33	Under construction
S22 (CSP7d)	6 St Pancras Way	Employment, retail, leisure and permanent self-contained homes	73	Under construction
S23 (HGC5a)	Tybalds estate (infill)	Permanent self-contained homes	56	Under construction
S24 (HCG5b)	294-295 High Holborn	Employment and permanent self-contained homes	10	Planning permission granted and initial works commenced
S25 (HCG5c)	156 – 164 Gray's Inn Road	Employment and permanent self-contained homes	14	Under construction
S26 (HCG5e)	8-10 Southampton Row	Hotel and permanent self-contained homes	9	Planning permission granted. A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been assessed as 9 additional homes in the context of the development permitted, but should relate to the scale of all additional floor area (GIA) proposed.

Ref*	Address	Allocated uses	Indicative capacity	Key considerations
S27 (HCG5f)	60-67 Shorts Gardens and 14-16 Betterton Street	Employment and permanent self-contained homes	4	Under construction
S28 (HCG5h)	Cockpit Yard and Holborn Library, 32-38 Theobalds Road	Employment, permanent self-contained homes, library	110	This site is being taken forward by the Council's Community Investment Team.  A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been estimated at 110 additional homes but should relate to the scale of all additional floor area (GIA) proposed.
S29 (HCG5j)	18 Vine Hill and 15-29 Eyre Street Hill	Hotel and permanent self-contained homes	9	Under construction
S30 (IDS20a)	Middlesex Hospital Annex 44 Cleveland Street	Health and permanent self-contained homes	57	Under construction
S31 (IDS20x)	Central Somers Town	Community uses and permanent self-contained homes	72	Under construction (earlier phases completed)
S32 (NEW)	Chalton Street, Godwin and Crowndale estate	Permanent self-contained homes	10	Planning permission granted
S33 (BC2a)	Birkbeck College, Malet Street	Higher education (academic and ancillary space)		See also Policy S3 Bloomsbury Campus

S34 (BC2b)	Senate House, (NE quadrant) Malet Street	Higher education (academic and ancillary space)		See also Policy S3 Bloomsbury Campus
S35 (BC2c)	20 Russell Square	Higher education (academic and ancillary space)		See also Policy S3 Bloomsbury Campus

\*Previous policy reference used in the draft Site Allocations Local Plan 2020 is shown in brackets

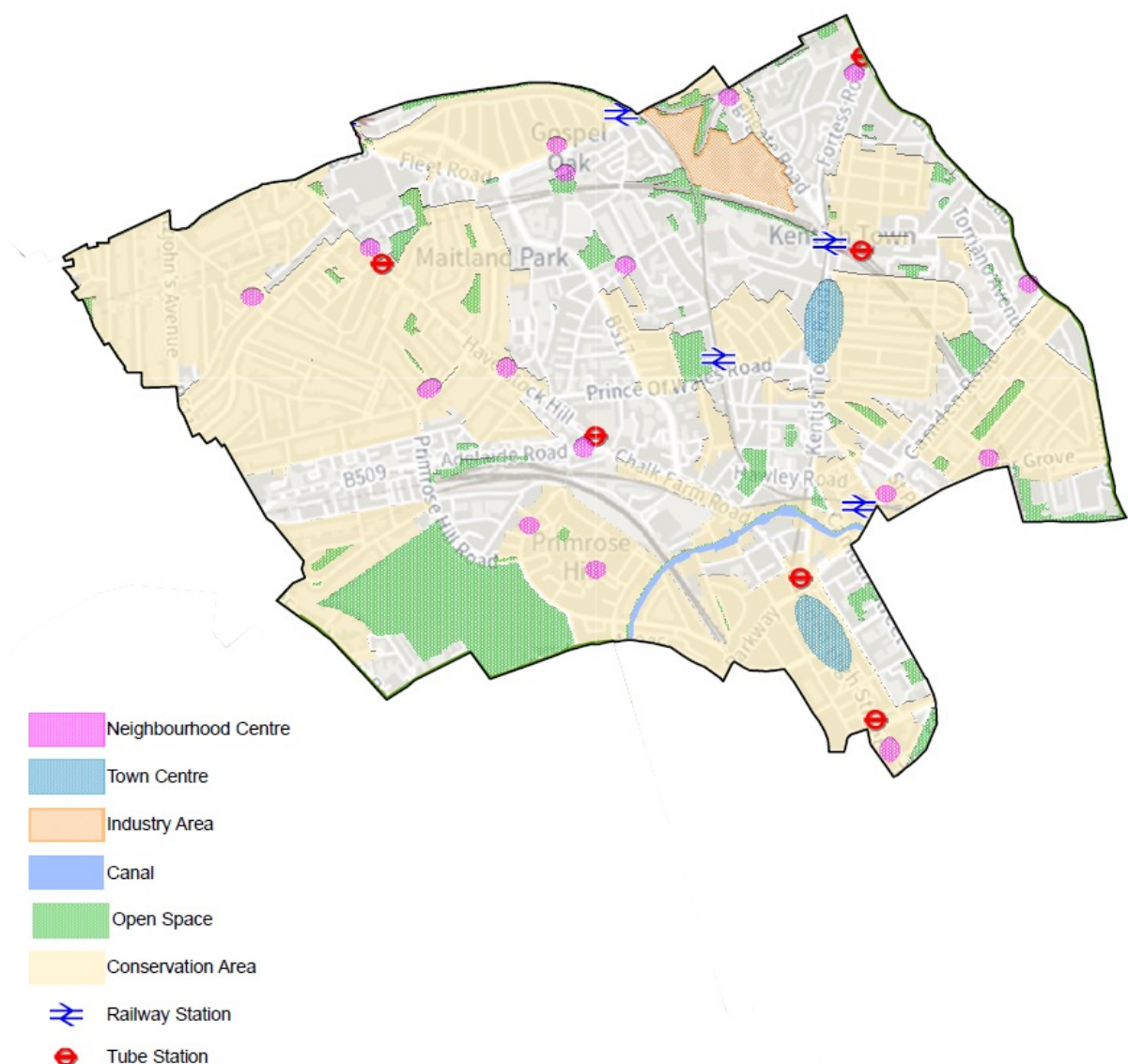
# Central Camden



# Chapter 4: Central Camden

**4.1** The Central area of the borough includes the neighbourhoods of Gospel Oak, Haverstock, Kentish Town, Belsize Park, Primrose Hill and Camden Town. The area is predominantly residential, with each neighbourhood having its own identity and distinct characteristics. From the Victorian villas and leafy streets of Primrose Hill and Belsize Park; to the post war housing estates in Gospel Oak and Haverstock; the Victorian terraces and clusters of industrial uses in Kentish Town; and the pockets of more modern development in Chalk Farm and Camden Town. Large parts of this area are also designated as conservation areas, and there are a number of listed and locally listed buildings in this location.

**Map 4 – Central Area**



**4.2** The area contains two town centres: Camden Town and Kentish Town, in addition to several neighbourhood centres. These centres form a focal point within these areas and are central to their individual identities. Camden Town is the largest town centre in the borough. It is internationally renowned as a tourist destination, famous for its markets, independent retailers and music and entertainment venues.

The centre also has a particularly strong leisure offer including restaurants, cafes, bars and clubs which make Camden Town a distinctive daytime and evening visitor destination. Kentish Town predominantly provides a day-to-day shopping and facilities serving local needs.

- 4.3** Camden Town is an important secondary office market within the borough and has a strong representation of creative businesses. Kentish Town is also an attractive location for creatives. There are significant clusters of industrial land in Kentish Town, mainly at Regis Road and on the Murphy site, with a concentration of small and medium sized enterprises also located within premises close to Highgate Road. The Murphy site forms part of a designated Industry Area.
- 4.4** The area has good public transport connections, with four mainline stations (Gospel Oak Overground, Kentish Town Thameslink, Kentish Town West Overground and Camden Road Overground); six underground stations (Tufnell Park, Kentish Town, Belsize Park, Mornington Crescent, Camden Town and Chalk Farm); and several local bus routes. Areas around Primrose Hill, Maitland Park, Gospel Oak and Agar Grove have lower levels of public transport accessibility though.
- 4.5** The Central area of the borough is well served by community facilities, with libraries in Camden Town, Kentish Town and Queen's Crescent, and community libraries in Primrose Hill and Belsize; two leisure centres in Kentish Town (the Talacre Community Sports Centre and Kentish Town Sports Centre); and a number of community centres.
- 4.6** Most of the Central area of the borough is well served by public open space. The largest area of open space in this part of Camden is Primrose Hill, which offers panoramic views across the centre of London. Other public open spaces include: Talacre, Lismore Circus, Montpelier Gardens, Gospel Oak Open Space, Hawley Street Open Space, Cantelowes Gardens and Camden Square Gardens. In addition to this, there are ten Sites of Importance for Nature Conservation (SINCs) in this area, which contribute to the borough's biodiversity and provide a focus for nature conservation activities in Camden.
- 4.7** A key feature of the Central area of the borough is the Regent's Canal. The Canal is Camden's only significant open watercourse and winds through the borough from Regent's Park to King's Cross. It is an important historical feature and a designated conservation area. The Canal is also designated as a site of metropolitan importance for nature conservation and there is considerable scope for environmental improvements to enhance biodiversity along its course.
- 4.8** The Centre of the borough has one adopted Neighbourhood Plan: the Kentish Town Neighbourhood Plan, which sets out the community's aspirations and planning policies for that area. The Neighbourhood Plan is part of the Council's statutory development plan and is considered, alongside our own policies, when making decisions on planning applications in that area.
- 4.9** A number of opportunities exist in this area to deliver new homes, jobs and infrastructure to support Camden's communities, the most significant being on the industrial sites at Regis Road and Murphy's in Kentish Town, where there



is opportunity for intensification and diversification to create a vibrant new neighbourhood, whilst ensuring the continued provision of industry, logistics and employment uses at a higher density and in a way that makes the most effective and efficient use of the land available. Further development is planned in the Camden Goods Yard area on the edge of Camden Town and through the Council's Community Investment Programme at West Kentish Town and Wendling and St Stephen's Close estates. The policy below sets out the Council's strategy for the Central area of the borough to guide the future development of this area.

## Policy C1 – Central Camden

- A.** Development coming forward in this area should have a positive identity drawing on the area's rich heritage and Camden's distinctive cultural energy, community and creative spirit. Development will be required to address issues of relative deprivation, inequality and poor health that exist in this area and deliver substantial benefit to Camden's communities, the local area and the borough as a whole in accordance with the Local Plan and the Kentish Town Neighbourhood Plan.

### New homes

- B.** Sites have been allocated in the Central area of the borough to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocations set out below.
- C.** The greatest concentration of development in Central Camden will be in the areas of Kentish Town, Camden Town and Gospel Oak and Haverstock.
- D.** Development in Kentish Town will mainly be delivered through site allocations at Regis Road and the Murphy Site, which are expected to deliver approximately 1,750 new homes. These existing employment sites will be intensified to deliver a new neighbourhood that provides a mix of uses, including industry and other employment uses; significant provision of permanent self-contained homes; community facilities; cultural and leisure uses; and open space, creating an exemplar sustainable, employment-led mixed-use area that is fully connected to, and integrated into, surrounding communities. To deliver the Council's and the community's visions and objectives for this area, we will expect development to be taken forward in accordance with the Kentish Town Planning Framework and the Kentish Town Neighbourhood Plan.
- E.** Development in Camden Town will mainly be delivered through site allocations in the Camden Goods Yard area, which are expected to deliver approximately 1,200 new homes. This area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes and provide a range of retail and employment spaces. To deliver the Council's vision and objectives for this area, the Council will expect development coming forward in this location to be taken forward in accordance with the Camden Goods Yard Planning Framework which has been adopted as a Supplementary Planning Document.
- F.** The Council is committed to a programme of estate renewal and regeneration delivered through the Council's Community Investment Programme (CIP). The

main focus of this work in the Central area of the borough is the West Kentish Town and Wendling and St Stephen's Close estates. To deliver the communities priorities for this area, the Council will expect development coming forward in this location to be taken forward in accordance with the Community Vision for Gospel Oak and Haverstock which has been adopted as a Supplementary Planning Document. Development coming forward in the Central area of the borough will be required to support the Council's estates mission and assist with the delivery of the Council's priorities for nearby housing estates.

- G. Where windfall sites come forward for housing development in this area, these will be determined in accordance with the policies in the Plan.

### **Employment and the Economy**

- H. New employment floorspace will be delivered in the Central area of the borough through site allocations, existing planning permissions and the development of windfall sites.
- I. A diverse range of employment uses are expected to be provided as part of the re-development of the Camden Goods Yard area to build on the innovative and creative economy of Camden Town. This should include the provision of affordable workspace, light industrial workshops, small units for start-ups and move-on space so that businesses can remain in the area and grow.
- J. On the Regis Road and Murphy sites in Kentish Town, development will be expected to include higher density provision of industry, logistics and other employment uses, providing space for, and a significant increase in, jobs in identified growth sectors, small and medium enterprises, start-ups, and businesses supporting London's Central Activity Zone (CAZ) and the local economy. Existing businesses will be expected to be retained as far as possible, in particular industrial and warehouse/logistics uses that support the functioning of the CAZ and/or the local economy.
- K. The Council will manage and protect the stock of offices in the Central area of Camden. Proposals for small scale office provision will be supported in Camden Town and Kentish Town centres and neighbourhood centres in this area where this is of a commensurate scale for its location, in line with Policy IE2 (Offices).

### **Retail and Town Centres**

- L. The majority of new retail development in the Central area of the borough is expected to be delivered through development in the Camden Goods Yard area.
- M. The Council will continue to support and protect the town centres of Camden Town and Kentish Town, and the Neighbourhood Centres in the Central area of the borough, to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors in line with the retail policies in the Plan, with any additional shopping and leisure uses to be provided in accordance with Policy IE6 (Supporting town centres and high streets).
- N. Camden Town is also a key focus of the evening and night-time economy in Camden, and the Council will support efforts to widen the range of evening and

night-time economy uses here, particularly where this will benefit local residents and people working night shifts, in line with the objectives set out in the Council's Evening and Night-time Economy Strategy.

## Infrastructure

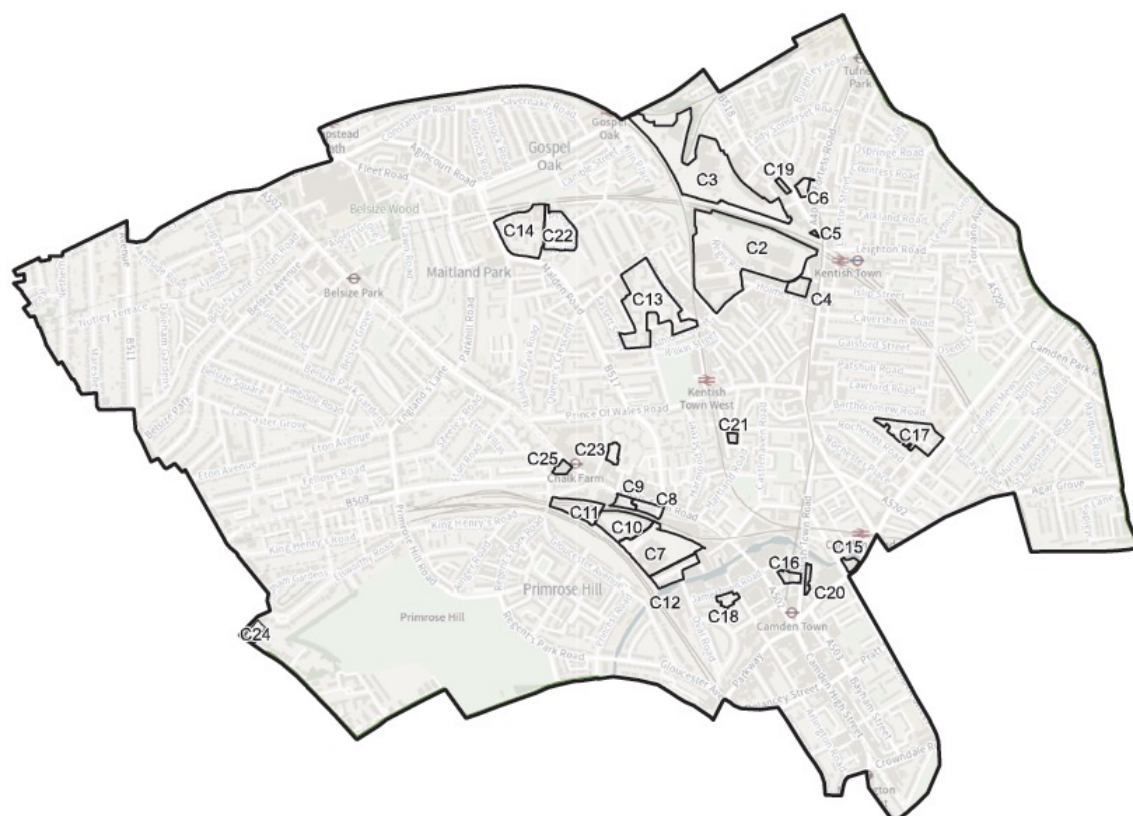
- O.** To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure, from appropriate development. The Council will work with relevant providers to secure the infrastructure needed to support development and provide the facilities needed for the area's communities. Key priorities for the Central area of the borough include:
- i.** The delivery of step free access at Kentish Town Underground and Thameslink Station; and Camden Town Underground Station;
  - ii.** The delivery of a new eastern access and public realm improvements at Gospel Oak Overground Station;
  - iii.** The creation of attractive and safer pedestrian and cycling routes both into and through the area to deliver the priorities set out in the Council's Transport Strategy and Cycling Action Plan;
  - iv.** The delivery of the Heath Line, a new green connection between Hampstead Heath and Kentish Town;
  - v.** Public realm improvements in Kentish Town Centre, Camden Town Centre and Queen's Crescent Neighbourhood Centre;
  - vi.** The roll-out of the Council's neighbourhood-based Safe and Healthy Streets schemes across this area, including reductions in through-traffic;
  - vii.** The provision of new community and health care facilities at Queen's Crescent Neighbourhood Centre to enhance and reinforce its role within the community;
  - viii.** The delivery of an Integrated Care Hub;
  - ix.** The delivery of new social infrastructure, including public toilets, and cultural uses, as part of the development of the Camden Goods Yard area and the Regis Road and Murphy sites;
  - x.** The provision of facilities for young people in Camden Town and the Gospel Oak and Haverstock area, including new, and/or improved sport and leisure facilities;
  - xi.** The Camden High Line, a 1.2km long elevated walkway that will link Camden Town and King's Cross;
  - xii.** Delivering new and enhanced areas of public open space and play space, and improving access to nature, in Kentish Town, Camden Town and Gospel Oak and Haverstock, in line with Policy SC3 (open space);
  - xiii.** The delivery of flood mitigation measures and sustainable drainage schemes;
  - xiv.** Greening and biodiversity enhancements; and
  - xv.** The provision of infrastructure for supporting local energy generation.

**4.10** Information on key infrastructure programmes and projects in the Central area of the borough are set out in Appendix 1.

## Site Allocations

4.11 A number of site allocations are proposed in the central area of the borough, and these are identified on Map 5 and listed in the table below.

**Map 5 – Proposed Site Allocations in the central area of the borough**



**Table 2 – Proposed Site Allocations in the central area of the borough**

Site Reference	Previous Policy Reference*	Site Name
C2	(KT2)	Regis Road and Holmes Road Depot
C3	(KT3)	Murphy Site
C4	(KT4)	Kentish Town Police Station
C5	(KT5)	369-377 Kentish Town Road
C6	(KT6)	Kentish Town Fire Station
C7	(CGY2)	Morrisons Supermarket
C8	(CGY3)	Former Morrisons Petrol Filling Station
C9	(CGY4)	100 Chalk Farm Road
C10	(CGY5)	Juniper Crescent
C11	(CGY6)	Network Rail land at Juniper crescent
C12	(CGY7)	Gilbeys Yard

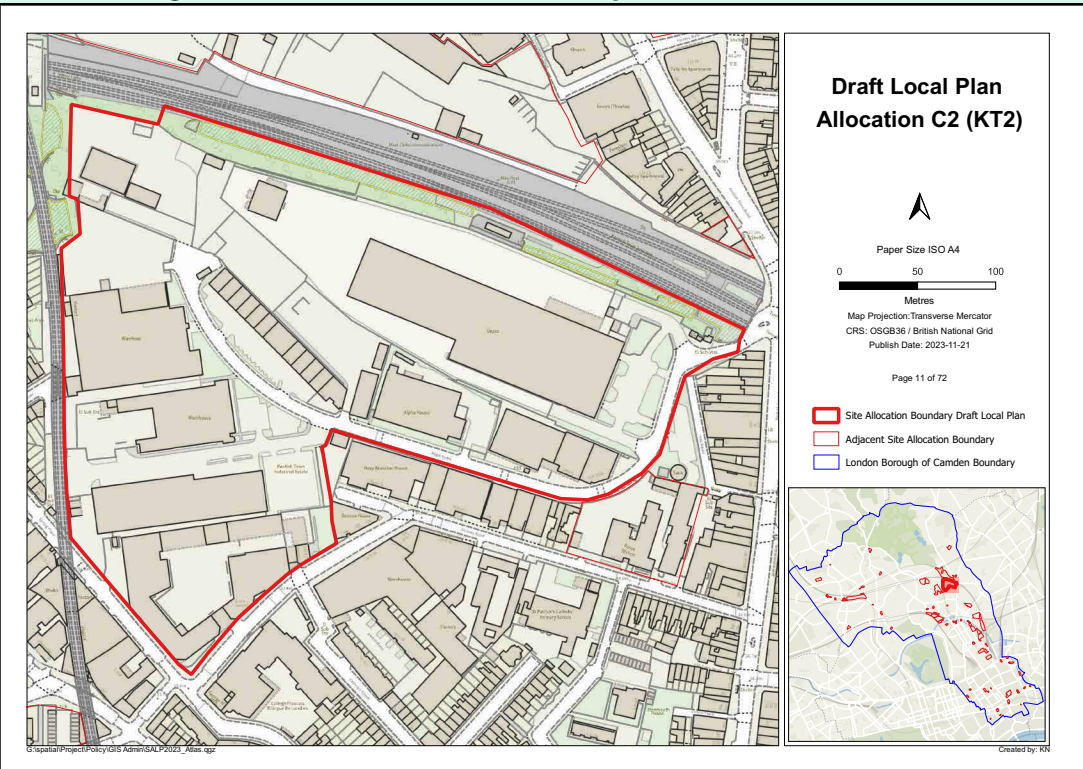
C13	(IDS13)	West Kentish Town Estate
C14	(IDS11)	Wendling Estate and St Stephens Close
C15	(IDS5)	Shirley House
C16	(IDS6)	Camden Town over station development
C17	(IDS20e)	UCL campus, 109 Camden Road
C18	(IDS20f)	Arlington Road former depot site
C19	(KT7)	Highgate Centre, Highgate Road
C20	(IDS8)	Grand Union House, 18-20 Kentish Town Road
C21	(IDS20g)	Heybridge Garages, Hadley Street
C22	(IDS20j)	Former flats 121 – 129 Bacton, Haverstock Road
C23	(IDS20m)	Former Charlie Ratchford Centre
C24	(IDS20u)	52 Avenue Road
C25	(new)	5-17 Haverstock Hill (Eton Garage)

\*Previous policy reference used in the draft Site Allocations Local Plan 2020

**4.12** Policies to guide the development of these sites are set out below. Where indicative housing capacities are identified for sites, it is important to note that these are not fixed figures that must be adhered to exactly. A larger number of homes may be supported where it is shown that this 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, and 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.

**ALLOCATION C2 (KT2) – Regis Road and Holmes Road depot**

**SITE PLAN**



**ADDRESS** Regis Road, Holmes Road Depot

**AREA** 7.9 ha

**ALLOCATED USES** Industry / employment (including offices); permanent self-contained homes, community uses; open space; waste and recycling facilities; depot

**INDICATIVE CAPACITY** 1,000 additional homes

**DESCRIPTION OF EXISTING SITE**

Regis Road site is currently home to several industrial premises, with logistics, manufacturing and other businesses, as well as the Council’s Regis Road Recycling and Reuse Centre and car pound. Many buildings on the site are single storey sheds surrounded by areas of yard space and parking. The Holmes Road Depot site houses a Council depot and offices, and 25 homes (including 20 affordable homes).

The site is bordered to the north and west by railway lines, to the south by the rear of properties on Holmes Road and to the east by York Mews behind Kentish Town Road. Currently the junction with Kentish Town Road is the only way in and out of Regis Road, which is largely cut off from surrounding areas. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

**BACKGROUND**

- Proposals should be progressed through a comprehensive masterplan process, informed by the Kentish Town Planning Framework.
- The Kentish Town Neighbourhood Plan recognises Regis Road as a potential area for mixed-use development. It sets out general development criteria expected to apply to proposals for development within the Regis Road site, subject to viability. The Plan notes that the site is currently underused and states that the intensification of the site through mixed-use development, including housing, industry, offices, start-ups, and other uses, is supported by the local community subject to consideration against relevant policies.

- The Neighbourhood Plan also includes a policy on the future development of the Holmes Road depot site.
- The Council is committed to progressing a Regeneration Strategy involving selling Camden's land assets on Regis Road and Holmes Road as an enabler and catalyst for the regeneration that will bring forward the benefits envisaged in the Planning Framework and the Neighbourhood Plan. The Strategy's objectives include enabling re-provision of the Recycling Centre and other Council service provision as necessary, ensuring continuous operation.
- The Regis Road and the Holmes Road depot site is allocated for comprehensive employment-led, sustainable mixed use development. It will provide space for a range of business uses, significant numbers of homes and new open spaces in an attractive place that is successfully connected to its surroundings, bringing benefits to Kentish Town and the wider area.
- The comprehensive redevelopment of the scale necessary at this location is likely to take some time. Prior to and during this, the Council aims to ensure that the area continues to be a functioning employment area. Temporary ('meanwhile') uses can play an important role in maintaining activity as a comprehensive scheme is progressed. Any development that comes forward in advance of a comprehensive scheme must follow the guidance set out in the Kentish Town Planning Framework section on temporary uses.
- Applications submitted in advance of the comprehensive redevelopment of the area that would prejudice the delivery of a comprehensive scheme or the aspirations for the area will not be permitted.

## **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) intensify industrial and other employment uses through efficient design through co-location with housing and other proposed uses;
- b) ensure that non-employment uses do not compromise the operation of existing or future employment uses;
- c) provide high density employment uses, including a mix of light industrial, industrial and storage / warehouse / logistics uses and a significant element of affordable workspace, to increase the range of business premises and sectors on site, and provide significant additional jobs;
- d) seek to contribute to the continued success of existing business clusters, including light industry and the creative and knowledge sectors, and maintain, and where possible expand, the area's role in providing for businesses supporting London's Central Activities Zone;
- e) seek to retain existing businesses that wish to stay on the site, where possible, and in particular uses that support the functioning of the CAZ or local economy. The developer should therefore work with existing businesses to understand their requirements, ambitions and the potential for re-provision or relocation. A business retention / relocation strategy must be provided as part of the planning application for the site;
- f) ensure any provision of retail, food and drink uses are of an appropriate scale and do not have a harmful impact on existing centres. Smaller scale provision will be supported where it is intended to serve the needs of those living and working in or visiting the site and activate key public spaces;

- g) reprovide the existing housing floorspace (including the affordable housing) from the Holmes Road Depot site in addition to the required new housing provision across the wider scheme area;
- h) make provision for particular housing needs identified in Policy H6C where appropriate, and consider inclusion of affordable housing for older people, or other people with care or support requirements, as part or all of the overall affordable housing contribution;
- i) significantly improve connections between the site and surrounding areas and provide safe and attractive pedestrian and cycle routes. In particular it must:
  - i. improve the link between Regis Road and Kentish Town Road, physically and visually, to better integrate the site with Kentish Town.
  - ii. seek to create additional access points, e.g. through the railway arches.
  - iii. provide an attractive, safe and clear east-west pedestrian and cycling route connecting Kentish Town Road with Gospel Oak.
  - iv. provide and facilitate connections between Regis Road and Holmes Road.
  - v. facilitate a new north-south pedestrian and cycle route from Kentish Town West to Highgate Road which passes through the site and ensure uses along the route reflect the area's industrial and railway heritage and make use of the railway viaduct.
- j) provide substantial new, welcoming and safe open spaces and public areas, and should look to provide a new public square as a focus for the area and community activity;
- k) enhance biodiversity across the site and in particular the biodiversity corridors along the railway lines to the north and northwest of the site, which are designated Grade 1 Site of Nature Conservation Importance. Proposals should investigate the potential for the provision of vegetation buffers along the railway lines to create/improve connections;
- l) seek to ensure that the site is designed to minimise vehicle movements and parking; and
- m) be designed to be compatible with, and facilitate, the development of neighbouring sites and in particular the Murphy site.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 52 m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## **INFRASTRUCTURE REQUIREMENTS**

Development must:

- n) retain or reprovide the Regis Road Recycling Centre and other Council service provision, as necessary, unless suitable compensatory sites are provided elsewhere that replace the existing service provision. The continuous availability of services must be maintained in all circumstances. Re-provision of the Recycling Centre must replace the maximum throughput achievable at the existing site;



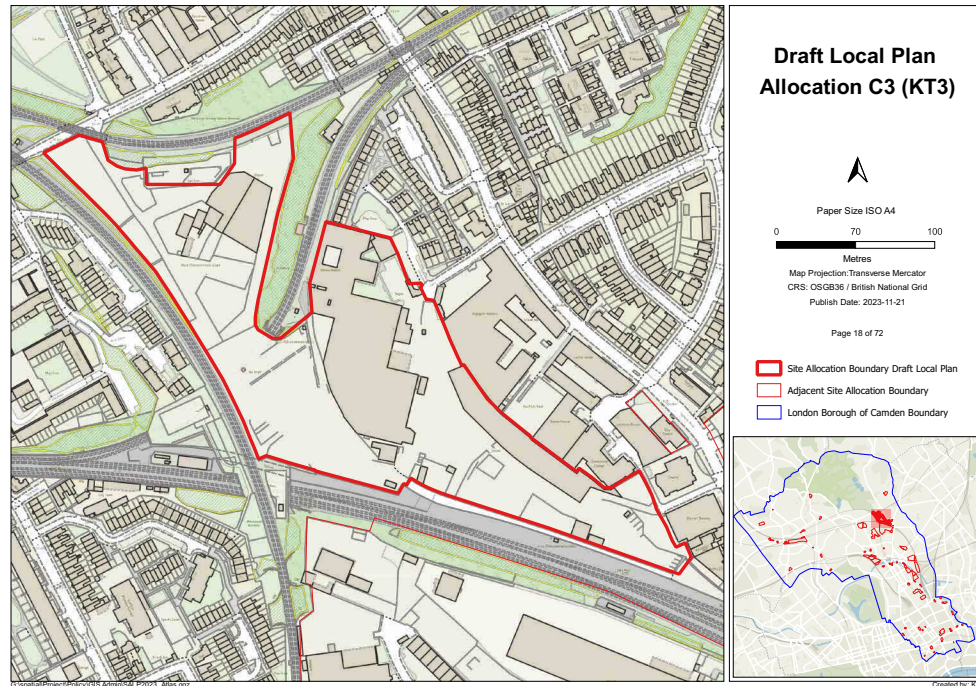
- o) provide, or facilitate and contribute towards, pedestrian and cycling links across the railway line to the Murphy site;
- p) contribute towards improvements at Kentish Town Thameslink station (including step free access, new station entrance and enhanced town square) and Gospel Oak station (including new eastern access and improved public realm); and
- q) explore developing an energy masterplan which supports the local approach to decarbonisation being led by the Council.

#### **OTHER CONSIDERATIONS**

- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC11 (Flood Risk).
- Part of this site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required.

## ALLOCATION C3 (KT3) – Murphy Site

### SITE PLAN



<b>ADDRESS</b>	J. Murphy & Sons Limited, Highgate Road
<b>AREA</b>	6.7 ha
<b>ALLOCATED USE</b>	Industry / employment; permanent self-contained homes; community uses; open space
<b>INDICATIVE CAPACITY</b>	750 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site is characterised by low intensity industrial use, open yard space and vehicle parking, with Murphy’s headquarter offices located within the northernmost former locomotive shed. The site is bounded by railway lines to the north, west and south and has limited access points. This site is predominantly owned and occupied by the Murphy group, with some land in Network Rail ownership. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- The Murphy site forms part of the Kentish Town Industry Area, which is considered to be a Locally Significant Industrial Site (LSIS) in terms of the London Plan.
- Part of the site lies within the Dartmouth Park neighbourhood area and part lies within the Kentish Town neighbourhood area. The site is identified in the Kentish Town Neighbourhood Plan as within the Kentish Town Potential Development Area. The Plan supports the mixed-use redevelopment of the site for housing, business and industrial uses. The Dartmouth Park Neighbourhood Plan recognises the site as providing an opportunity for development for a mix of residential and business/employment units to enhance the area and sets out aspirations for any development.
- The Murphy site has the potential for comprehensive employment-led development. This should create a vibrant, sustainable new mixed-use area, taking the opportunity for significant intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses.

- Temporary (“meanwhile”) uses can play an important role in maintaining activity on a site as a comprehensive scheme is progressed. The Council will expect a meanwhile use strategy for the Murphy site as part of comprehensive development proposals in line with considerations set out in the Kentish Town Planning Framework section on Temporary uses.
- Applications submitted in advance of the comprehensive redevelopment of the site that would prejudice the delivery of a comprehensive scheme or the aspirations for the area will not be permitted.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) intensify industrial provision to increase, or at least maintain, industrial, storage and warehousing capacity, and provide for other high density employment uses reflecting existing local business clusters and Camden’s growth sectors;
- b) use efficient design to allow co-location with housing and other proposed uses, ensuring that the introduction of non-employment uses does not compromise the operation of existing or future employment uses;
- c) ensure that the intensification of employment uses provides high-quality, modern, flexible employment spaces, and significantly increases the number of jobs on the site. The provision of a significant element of affordable workspace will also be expected;
- d) seek to contribute to the continued success of existing business clusters, including light industry and the creative and knowledge sectors, and maintain, and where possible expand, the area’s role in providing for businesses supporting London’s Central Activities Zone;
- e) ensure the level of provision of new office floorspace avoids changing the character of the employment offer on this designated industrial site. Large floorplate ‘corporate’ offices are unlikely to be considered suitable;
- f) ensure that any provision of retail and food and drink uses is of a scale appropriate to serving the needs of those living in, working in or visiting the site and would complement, and not compete with or cause harm to, the vitality and viability of existing centres, in particular at Kentish Town and Queens Crescent;
- g) make provision for particular housing needs identified by Policy H6C where appropriate, and seek to include Extra Care housing and supported housing for people with learning disabilities, as part or all of the overall affordable housing contribution;
- h) provide substantial new, welcoming and safe open space and public areas;
- i) take opportunities to enhance biodiversity, with potential for the provision of vegetation buffers along the railway lines to create/improve connections for wildlife. The area along the railway lines to the north of the site is designated as a Grade I Site of Nature Conservation Importance;
- j) take into account the community’s desire to maintain the view across the site towards Parliament Hill from the area adjacent to Kentish Town Station in accordance with the Kentish Town and Dartmouth Park Neighbourhood Plans;
- k) include provision for young people and inclusive community space to support the local community. Development should also seek to complement and enhance the area’s existing cultural offer;
- l) ensure that the design and the materials used are informed by the history of the

## INFRASTRUCTURE REQUIREMENTS

Development must:

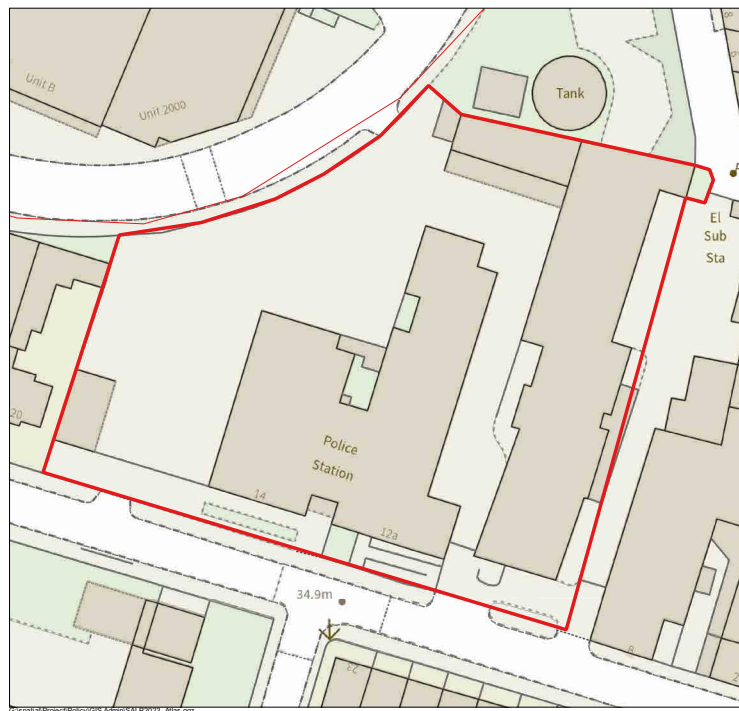
- m) provide, or facilitate, and contribute towards, pedestrian and cycling links to adjacent sites, including a new north-south route from Kentish Town Station to Highgate Road passing through the site and a link across the railway line to the Regis Road site;
- n) deliver improvements to Greenwood Place;
- o) contribute towards improvements at Kentish Town Thameslink station (including step free access, new station entrance and enhanced town square) and Gospel Oak station (including new eastern access and improved public realm); and
- p) explore developing an energy masterplan which supports the local approach to decarbonisation being led by the Council.

## OTHER CONSIDERATIONS

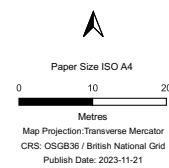
- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC11 (Flood Risk).
- Part of this site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required.

## ALLOCATION C4 (KT4) – Kentish Town Police Station

### SITE PLAN

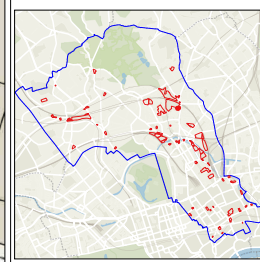


### Draft Local Plan Allocation C4 (KT4)



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- ▭ Site Allocation Boundary Draft Local Plan
- ▭ Adjacent Site Allocation Boundary
- ▭ London Borough of Camden Boundary



<b>ADDRESS</b>	Kentish Town Police Station, 10-12A Holmes Rd
<b>AREA</b>	0.4 ha
<b>ALLOCATED USE</b>	Police facilities; permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	35 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	This site contains a listed Victorian police station (Station House), with a more modern annex building attached, and an eight storey police Section House. It also includes a yard, vehicle parking and some small-scale structures. The site fronts on to Holmes Road but has vehicular access to Regis Road at the rear.

### BACKGROUND

- The Metropolitan Police Service intend to retain the police use of the station and annex to meet operational requirements but there is potential to make more efficient use of parts of the site, such as the yard / parking space and the Section House.
- Development should provide for continued police facilities or mixed-use development for police facilities and permanent self-contained homes. Community uses and small-scale employment uses may also be suitable.
- The Council would support the site being incorporated into the Regis Road Allocation KT2 if this enabled a better solution for operational needs of the Metropolitan Police Service to be found and helped the delivery of the Regis Road masterplan.

### DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) ensure that the introduction of other uses on the site do not compromise police operational requirements;

- b) preserve the listed police Station House building and not harm its setting, in accordance with Policy D5 (Heritage), and seek to retain the Section House building in accordance with Policy CC2 (Repurposing, Refurbishment and Re-use of Existing Buildings);
- c) be designed to address both Holmes Road and Regis Road and take the opportunity to provide a safe and attractive pedestrian and cycle route between them, improving connections with surrounding communities; and
- d) be designed to ensure that the main vehicular entrance to the site is from Regis Road in order to accommodate the Council's wider aspirations for the Holmes Road area.

**ALLOCATION C5 (KT5) – 369 – 377 Kentish Town Road**

**SITE PLAN**



**Draft Local Plan  
Allocation C5 (KT5)**

North arrow pointing up.

Paper Size ISO A4

0 4 8  
Metres

Map Projection: Transverse Mercator  
CRS: OSGB36 / British National Grid  
Publish Date: 2023-11-21

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Site Allocation Boundary Draft Local Plan  
 Adjacent Site Allocation Boundary  
 London Borough of Camden Boundary

Created by: K1

<b>ADDRESS</b>	369-377 Kentish Town Road
<b>AREA</b>	0.3 ha
<b>ALLOCATED USE</b>	Permanent self-contained homes; retail/restaurant
<b>INDICATIVE CAPACITY</b>	14 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	369-377 Kentish Town Road (often known as the 'car wash site') is a prominent corner site at the northern end of Kentish Town Road next to the railway bridge. The site is within a viewing corridor set out in the London View Management Framework SPG.

**BACKGROUND**

- In March 2020 the Council granted planning permission for the development of the site for a six/seven storey building to provide 14 flats, retail or restaurant at ground floor and basement levels, with a widened pavement on Kentish Town Road.
- Development should make more efficient use of the site, visually improve the area and help to facilitate movement through the Kentish Town area and access to the Murphy site.
- The Kentish Town Neighbourhood Plan contains a site-specific policy for 369-377 Kentish Town Road which supports its mixed-use redevelopment combined with the widening of the pavement in front of the site and the relocation of the bus shelter. The widening of the pavement in front of the sites is identified in the Plan as contributing to meeting the Neighbourhood Forum's aspirations for a Kentish Town Square.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) be of a high quality design reflecting the sites prominent location on Kentish Town Road, within a strategic viewing corridor; the adjacent Conservation Area to the east; and the listed buildings nearby, including the Assembly House public house to the south on the other side of Kentish Town Road; and
- b) facilitate links to any future development of the Murphy site and be designed to facilitate the future delivery of an attractive pedestrian and cycle route to link Kentish Town Station to Hampstead Heath and connections to the Murphy site, for example a walkway cantilevered over the adjacent railway cutting, and contribute towards creating a welcoming entrance to that key site. Should this lead to a reduction in the number of homes provided compared to the current planning permission, the Council will expect these to be reprovided as part of neighbouring developments.

## INFRASTRUCTURE REQUIREMENTS

Development must:

- c) contribute towards the widening of the adjacent pavement and the relocation of the bus shelter to improve passenger and pedestrian safety, consistent with aspirations for a new Kentish Town Square.

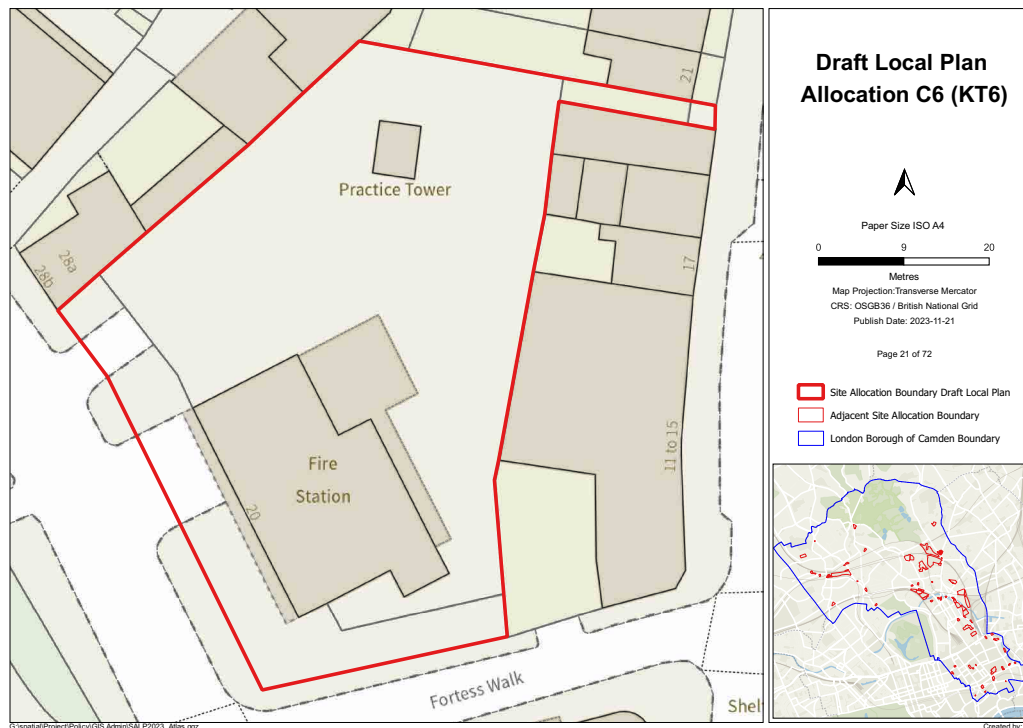
## OTHER CONSIDERATIONS

- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC11 (Flood Risk).



## ALLOCATION C6 (KT6) – Kentish Town Fire Station

### SITE PLAN



<b>ADDRESS</b>	Kentish Town Fire Station, 20 Highgate Rd
<b>AREA</b>	0.24 hectares
<b>ALLOCATED USE</b>	Fire station; permanent self-contained homes or student accommodation
<b>INDICATIVE CAPACITY</b>	30 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site lies to the north of Kentish Town's town centre and is occupied by the operational Kentish Town Fire Station. The London Fire and Emergency Planning Authority's Asset Management Plan rates the site as having poor functionality and being in poor condition, listing it as a priority site for improvement through redevelopment rather than relocation.

### BACKGROUND

- This site provides an opportunity to deliver a replacement fire station to better meet the ongoing needs of the London Fire Brigade and introduce housing as an additional use to make more effective use of the site. The provision of student accommodation on the site may also be considered acceptable. Mixed-use development involving an operational fire station and housing accommodation has taken place elsewhere in London.
- Should the existing fire station be declared surplus to the operational needs of the London Fire Brigade, with the service being provided at another location, the site should be assessed for suitability for an alternative community use. Where it can be demonstrated to the Council's satisfaction there is no reasonable prospect of alternative community use as part of a mixed-use scheme, the Council's preferred alternative is development for housing including affordable homes.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

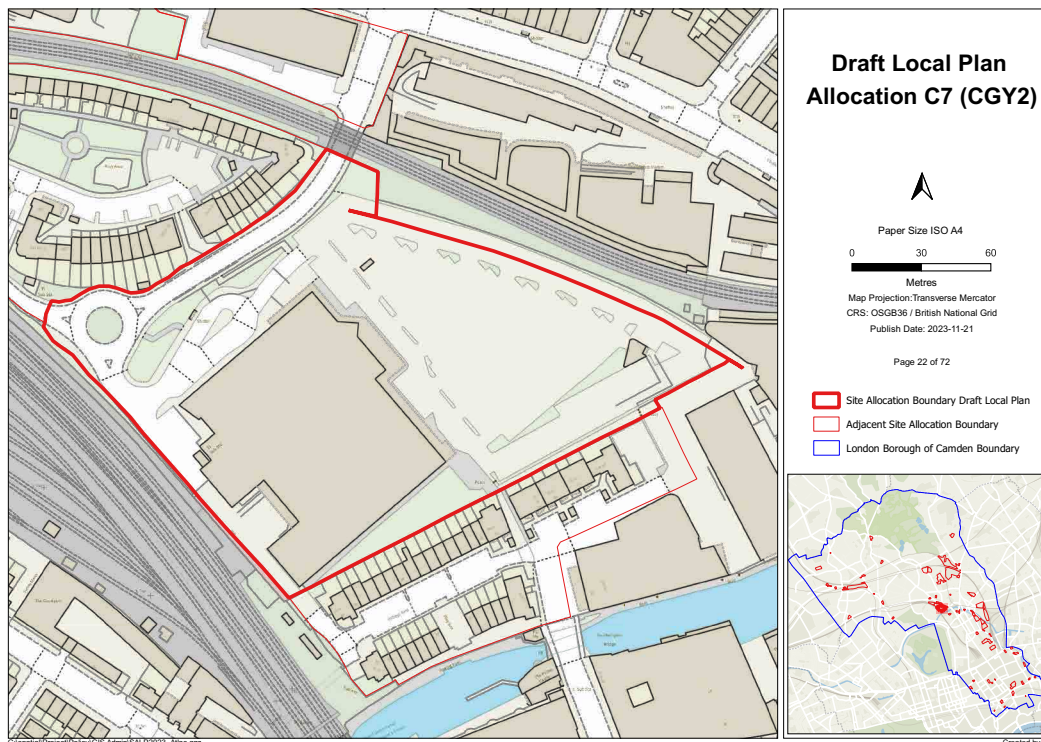
- a) ensure that the incorporation of housing as part of a mixed-use scheme does not compromise the operation of the fire station;
- b) be designed in accordance with the 'agent of change' principle, to ensure that potential conflicts between the uses on the site and between the site and surrounding properties are minimised and development does not cause unacceptable harm to the amenity or quality of life of the occupants of nearby properties or new homes on the site. A noise assessment and proposed mitigation measures should therefore be submitted as part of any planning application;
- c) be designed to respond to and enhance the setting of the listed Christ Apostolic Church opposite;
- d) retain existing trees and provide suitable new planting and landscaping; and
- e) take the opportunity to improve the relationship of the site with its surroundings at Highgate Road, Fortess Road and Fortess Walk.

## OTHER CONSIDERATIONS

- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC11 (Flood Risk).

## ALLOCATION C7 (CGY2) – Morrisons supermarket

### SITE PLAN



<b>ADDRESS</b>	Morrisons supermarket, Chalk Farm Road NW1 8EH
<b>AREA</b>	2.5 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes, employment (offices and maker spaces), retail, food and drink, community and leisure use
<b>INDICATIVE CAPACITY</b>	644 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	Site was previously in use as a Morrisons Supermarket, with associated car park. The site sits between railway lines in an elevated position looking down into the markets. There is an existing planning permission (as amended) on this site which is currently under construction. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- The Morrisons supermarket is a key site in the delivery of the Council's aspirations for the Camden Goods Yard area, in terms of its location and the scale of opportunity it presents.
- This site makes a significant contribution to the Council's housing supply, with the permitted scheme (2020/3116/P) delivering 644 homes. Should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including the on-site affordable housing) to be maintained or increased and the key benefits for the wider area to be delivered.
- If the existing planning permission is not implemented, or is only partially implemented, the criteria below will be used to determine future planning applications on this site.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) deliver a range of housing types and tenures and employment uses, including affordable workspace and workshops/ maker spaces, in a range of unit types and sizes;
- b) reprovide a supermarket and provide new small scale retail food and drink uses that add variety to Camden Town centre. Public house uses or hot food takeaway uses will not be supported in this sensitive frontage as they are well represented in the core town centre;
- c) successfully integrate with existing neighbourhoods and address the sites current separation;
- d) provide an attractive and inviting gateway from Chalk Farm Road, and improved links with the markets;
- e) be designed to take opportunities to reference both local and lost historical features, particularly the sites industrial and transport heritage, and celebrate the heritage significance of the Goods Yard. The Council supports proposals to further open-up the subterranean architecture of tunnels and vaults and will expect the detailed layout of the site to retain the possibility of public access to the 'Winding Vaults';
- f) give priority to walking, wheeling and cycling, with vehicles only able to access the site from Chalk Farm Road. New routes should be direct, accessible, attractive and safe. Provision of step-free options is considered essential for ensuring inclusive access, given the changes in levels across this site;
- g) remove existing car parking in line with this Plan's car free approach;
- h) deliver public open spaces of varying scale and character, that provide a range of experiences and activities, and which are inclusive, accessible and safe. The Council will give priority to the provision of green amenity areas and play space for the full range of ages;
- i) seek to ensure that open spaces include areas for wildlife and the creation of green routes along the railway edges; and
- j) contribute towards the delivery of a new route for pedestrians and cyclists adjacent to the West Coast mainline railway that connects Regent's Park Road bridge with Regent's Canal towpath ('Stephenson's Walk'), creating opportunities to reveal, restore and access the heritage assets related to the original railway as set out in the Camden Goods Yard Planning Framework. Developers will be expected to work with adjoining land owners.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 53 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## INFRASTRUCTURE REQUIREMENTS

Development must:

- k) contribute towards delivering a spinal route for pedestrians and cyclists to connect Oval Road/Regent's Canal, via Gilbeys Yard, with Juniper Crescent and onwards to Regent's Park Road and Primrose Hill; and

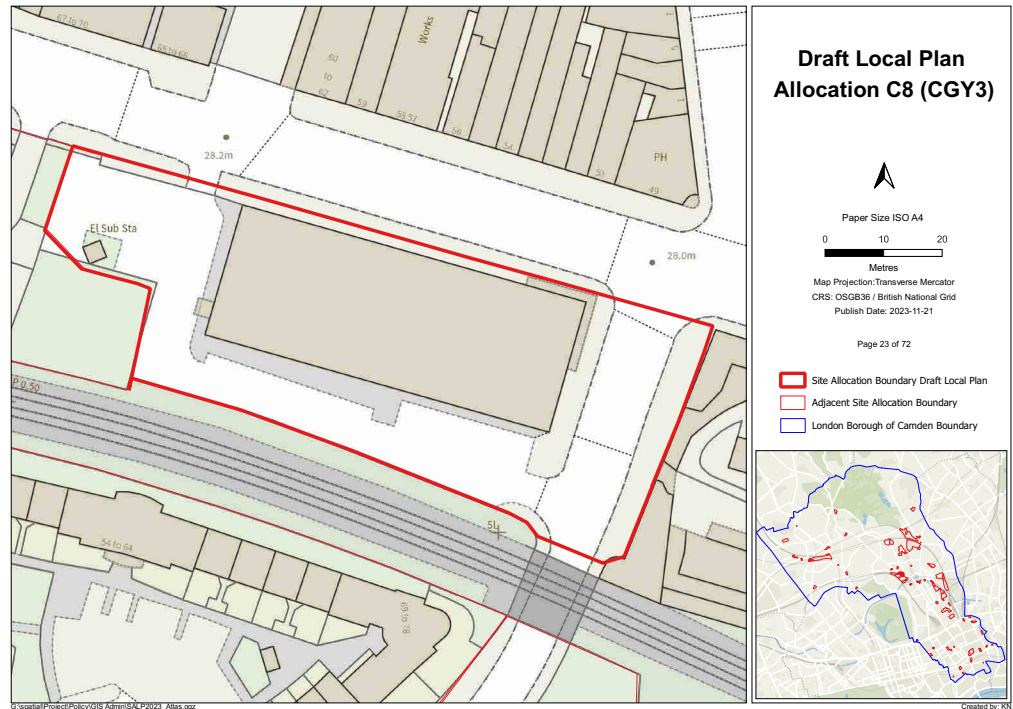
- i) seek to deliver a sustainable long-term solution to minimise the environmental impacts of bus movements on residential amenity and the public realm in the Camden Goods Yard area, whilst ensuring that accessibility to bus services is maintained. The Council will expect applicants to engage with neighbouring landowners and other relevant stakeholders, to establish the optimal location for the stands for different users, while ensuring they do not unacceptably intrude upon people's experience and enjoyment of moving through a proposed scheme, including the practicality of alternative locations outside the site.

#### **OTHER CONSIDERATIONS**

- The access road leading to the existing supermarket, Juniper Crescent and the Network Rail site is safeguarded as a construction access for works associated with High Speed Two (HS2). Developers of this site will therefore be expected to coordinate with HS2 Ltd, and their contractors, arrangements for traffic management and timings of construction works to minimise/mitigate conflicts and cumulative impacts on the transport network.
- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.
- The Council will require the developer to provide a Community Support and Engagement Plan which develops a community vision and purpose for the new estate, with assistance provided for volunteering and capacity building initiatives and to give residents a strong sense of ownership of streets/spaces, helping to tackle anti-social behaviour. This should be planned across site boundaries to deliver optimal benefits, including interaction between communities living in different parts of the Goods Yard area and beyond.
- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC11 (Flood Risk).
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required.

## ALLOCATION C8 (CGY3) – Former Morrisons petrol filling station

### SITE PLAN



<b>ADDRESS</b>	Former Morrisons Petrol Filling Station, Chalk Farm Road NW1 8EH
<b>AREA</b>	0.3 hectares
<b>ALLOCATED USE</b>	Employment (offices), permanent self-contained homes, retail, food and drink
<b>INDICATIVE CAPACITY</b>	A contribution to delivery of housing off site will be expected having regard to relevant Local Plan policies, including Policy H2. In the context of the development permitted, this contribution is encompassed in the housing led development of the Morrisons supermarket site (Allocation C7).
<b>DESCRIPTION OF EXISTING SITE</b>	The former petrol station site is within the designated Camden Town town centre and occupies a prominent location at the entrance to the wider Goods Yard. The site currently contributes to the fragmentation of the Town Centre frontage (as shown on the Council's <a href="#">Policies Map</a> ). The open expanse of the petrol station forecourt has been replaced by a temporary food store which commenced trading in early 2021. Once this temporary use has ceased, it is anticipated this building will be dismantled allowing for a permanent development to optimise use of this site. It is a key site in the Regents Canal Conservation Area providing the setting and historic context for a number of heritage assets, having been within the Goods Yard wall area. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- The Council granted planning permission (2022/3646/P) for this site in conjunction with proposals for the Morrisons supermarket site for an office building including retail and food and drink uses on lower floors.
- If this site were to come forward for development on its own, a scheme including self-contained housing is also likely to be beneficial, where this is consistent with activating the southern frontage of Chalk Farm Road and is co-ordinated with proposals for 100 Chalk Farm Road. The residential capacity will be assessed at that stage.

- If the existing planning permission is not implemented the criteria below will be used to determine future planning applications on this site.

#### **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) take into consideration the development of adjacent sites, particularly 100,100a and 100b Chalk Farm Road to ensure the optimal layout of the two sites;
- b) help create a new and inviting gateway for pedestrian and cyclists to the wider Camden Goods Yard through the design of the site;
- c) consider the provision of residential floorspace to help meet Camden's identified housing needs;
- d) setback the building line along Chalk Farm Road to deliver a wide pavement, providing an attractive route for pedestrians towards Chalk Farm Road station;
- e) be designed to express the sites importance as a 'gateway' to the Goods Yard and historic setting; and
- f) contribute towards a more engaging active frontage on the south side of Chalk Farm Road, drawing on the historic character and commercial function of this part of the Town Centre.

#### **INFRASTRUCTURE REQUIREMENTS**

Development must:

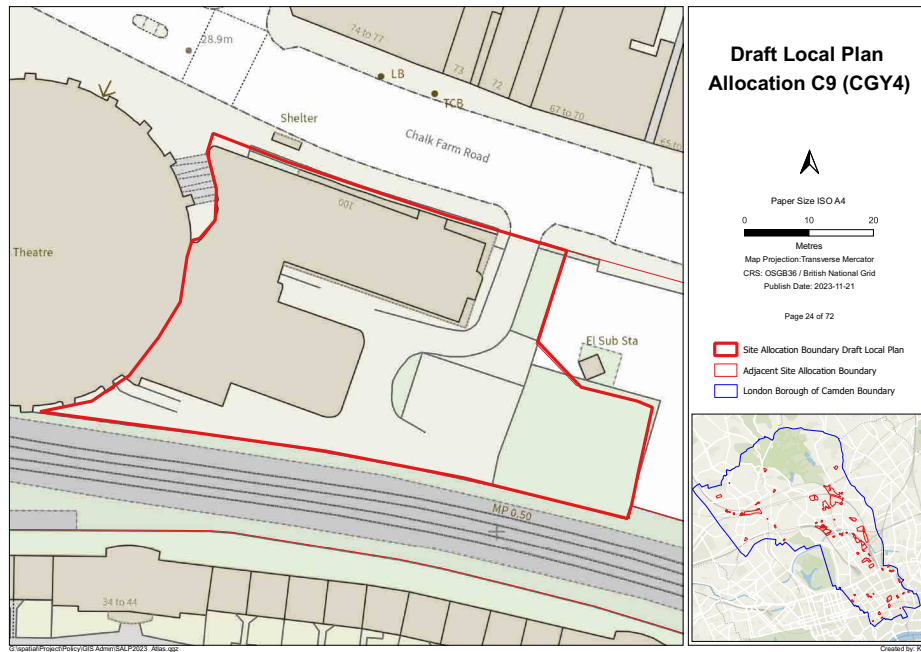
- g) reprovide the consented youth space secured through planning permission (2022/3646/P) in a suitable location.

#### **OTHER CONSIDERATIONS**

- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC11 (Flood Risk).
- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.

## ALLOCATION C9 (CGY4) - 100 Chalk Farm Road

### SITE PLAN



<b>ADDRESS</b>	100, 100a and 100b Chalk Farm Road NW1 8EH
<b>AREA</b>	0.3 hectares
<b>ALLOCATED USE</b>	Employment, permanent self-contained homes, student accommodation, retail and cafes/ restaurants (ground level)
<b>INDICATIVE CAPACITY</b>	100 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site comprises three commercial buildings with surface and underground car parks to the rear. A large 1970's office block faces onto Chalk Farm Road which has no reference to its context or engagement with the street. Although within the designated Camden Town centre, this part of the centre is fragmented, and considered to detract from the overall character and vitality of the Town Centre. The North London railway viaduct is located behind the site, separating it from Juniper Crescents housing estate to which Policy CGY5 relates. The Grade II* listed Roundhouse building is located immediately adjacent to the site and there is a Grade II listed cattle trough to the front of the site.

### BACKGROUND

- The Council considers that this site could be developed to support a variety of uses.
- A key objective is to bring better engagement between the site and Chalk Farm Road. This can be achieved by providing appropriate town centre uses opening onto the street to add diversity and vibrancy in this location.
- The provision of student accommodation on the site may also be considered acceptable.



## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) provide an appropriate quantum of employment floorspace in line with Local Plan policy;
- b) include self-contained residential floorspace and could consider provision of suitable student accommodation subject to being in accordance with Policy H9 (Student accommodation);
- c) be of a high-quality design, that is appropriate to the high street location and responds to the area's historic context and assesses the impact of proposals on locally important views of which those of the Roundhouse and Stables Market/Horse Hospital are particularly critical;
- d) enhance the setting of the Roundhouse and the adjacent gap, by opening up views of this heritage asset from Chalk Farm Road, whilst ensuring it can continue to be read as a separate entity in the townscape. Separations and setting back of development from the listed structure, splaying building lines, and the location of open space in proposals could help address this;
- e) consider how the relationship with neighbouring land to the east, including the Former Petrol Filling Station site, can be enhanced, considering how this area may change. We expect the collaboration and co-design of proposals to ensure a coherent and optimised approach across both sites to deliver efficient use of land, a compatible mix of uses and higher quality townscape. This should assess how employment (offices) and residential uses can be optimised;
- f) be setback to allow a widened footpath along Chalk Farm Road;
- g) remove existing car parking in line with this Plan's car free approach; and
- h) ensure that existing night time entertainment uses, in particular the neighbouring Roundhouse venue, are not adversely impacted by the development of the site, with off-site mitigation measures secured as a last resort in line with the agent of change principle.

## INFRASTRUCTURE REQUIREMENTS

Development must:

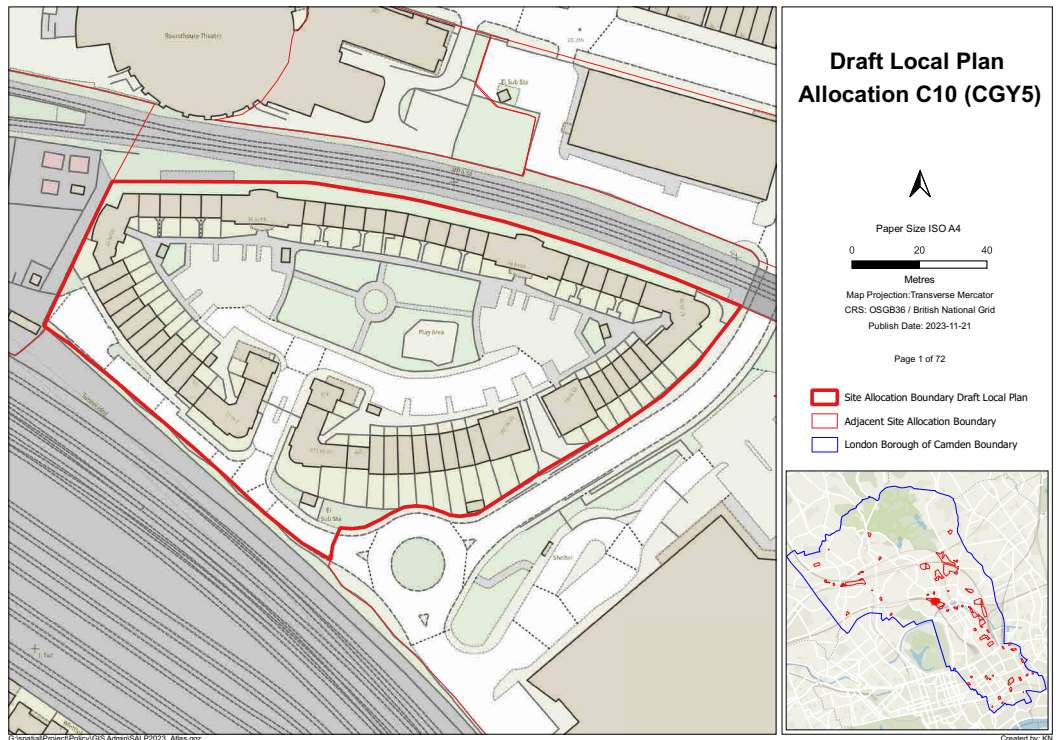
- i) contribute towards public realm improvements for pedestrians and cyclists to Chalk Farm Road.

## OTHER CONSIDERATIONS

- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC11 (Flood Risk).
- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.

## ALLOCATION C10 (CGY5) – Juniper Crescent

### SITE PLAN



<b>ADDRESS</b>	Juniper Crescent housing estate
<b>AREA</b>	1.3 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes, small-scale employment space and community uses (or other appropriate ground floor uses)
<b>INDICATIVE CAPACITY</b>	290 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The Juniper Crescent housing estate comprises 3-4 storey flats and houses arranged around a central courtyard, public open space and play facilities. The site is separated from development along Chalk Farm Road by the North London line railway viaduct and operational railway lines to the south and west. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- The site is owned by One Housing group. As a pre-condition for funding support from the Mayor of London, housing regeneration schemes are subject to a ballot of residents. A ballot held in late 2022 was successful.
- A housing led development delivering significant regeneration benefits for the estate and wider Camden Goods Yard area is supported here.
- The inclusion of private homes is supported to help fund the provision of high quality replacement homes and to maximise delivery of additional affordable housing.
- Provision of affordable housing for older or vulnerable people as part of the overall affordable housing contribution may be appropriate.
- Landowners/developers will be expected to work together to address the estate's physical separation.

- As the access road is safeguarded to enable work associated with High Speed Two (HS2). The cumulative impact and timings of HS2 works and other schemes in the Goods Yard area will need to be carefully considered.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- provide a significant number of new and replacement homes to meet a range of housing needs including the maximum reasonable amount of affordable housing;
- ensure there is no net loss of socially rented floorspace and that all existing households receive suitable replacement accommodation as demonstrated by evidenced from a needs based assessment;
- include a housing phasing plan that minimises disruption for residents. Where possible estate residents should only be asked to move home once, with early phases of development being prioritised for decant housing, prior to large scale demolition of existing homes;
- make provision for particular housing needs identified by Policy H6C where appropriate, and consider inclusion of affordable housing for older people or other people with care or support requirements, as part or all of the affordable housing contribution;
- ensure that complementary uses such as employment, retail, cafes or community uses are designed in a way that reinforces the character of principal routes through the site to help create lively and well overlooked streets and spaces. An extension of Camden Town centre into this location is not considered appropriate;
- address the estate's physical separation by improving sightlines into the estate, by improving access to the estate, particularly to/from local town centres, and through design that expresses the site's historic role as part of the Goods Yard;
- be designed to be designed to consider the impacts on locally important views, especially of The Roundhouse;
- rationalise parking on-site in line with Policy T5 (parking and car free development). Where existing residents parking is reprovided this should be located to minimise car movements within the site and designed to allow for repurposing when no longer required; and
- seek to improve community safety through natural surveillance of entrances/exits to the estate and homes/apartment blocks. Development facing onto streets can assist with this;

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 9m -45 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## INFRASTRUCTURE REQUIREMENTS

Development must:

- provide additional open space, including green space, play facilities and tranquil areas;
- seek to ensure that open spaces include areas for wildlife and the creation of green routes along the railway edges;

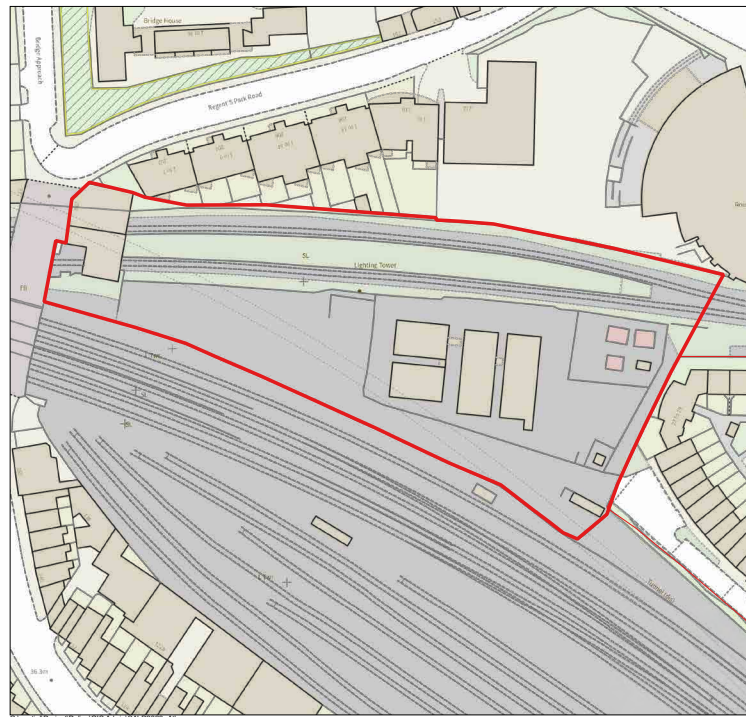
- l) contribute towards delivering a spinal route for pedestrians and cyclists to connect Oval Road/Regent's Canal, via Gilbeys Yard, with Juniper Crescent and onwards to Regent's Park Road and Primrose Hill;
- m) contribute towards the delivery of a new route for pedestrians and cyclists adjacent to the West Coast mainline railway that connects Regent's Park Road bridge with Regent's Canal towpath ('Stephenson's Walk'), creating opportunities to reveal, restore and access the heritage assets related to the original railway as set out in the Camden Goods Yard Planning Framework. Developers will be expected to work with adjoining landowners; and
- n) explore opportunities for optimising the location of bus stops/stands servicing the Morrisons supermarket site and wider Goods Yard area to minimise impacts on resident amenity and quality of place.

#### **OTHER CONSIDERATIONS**

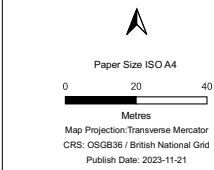
- The Council will require the developer to provide a Community Support and Engagement Plan which develops a community vision and purpose for the new estate, with assistance provided for volunteering and capacity building initiatives and to give residents a strong sense of ownership of streets/spaces, helping to tackle anti-social behaviour. This should be planned across site boundaries to deliver optimal benefits, including interaction between communities living in different parts of the Goods Yard area and beyond.
- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required.

## ALLOCATION C11 (CGY6) – Network Rail land at Juniper Crescent

### SITE PLAN

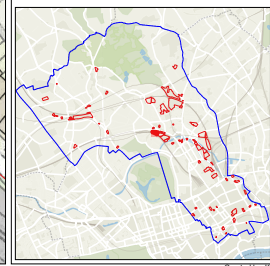


### Draft Local Plan Allocation C11 (CGY6)



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- ▭ Site Allocation Boundary Draft Local Plan
- ▭ Adjacent Site Allocation Boundary
- ▭ London Borough of Camden Boundary



<b>ADDRESS</b>	Network Rail land at Juniper Crescent
<b>AREA</b>	0.9 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes, office / light industrial, operational railway use
<b>INDICATIVE CAPACITY</b>	50 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site is currently safeguarded to support High Speed Two (HS2) construction works and provides an operational access point to the railway. It is accessed from Chalk Farm Road via a secure access gate adjacent to homes in Juniper Crescent. Part of the site provides temporary office accommodation for enabling works associated with HS2 which sits within a compound. There are also various cabins and machinery used to support railway maintenance works. Furthest from the access gate is the site of the platforms that formed part of the former Primrose Hill station: the converted ticket hall on Regent's Park Road has been retained.

### BACKGROUND

- The Council considers this to be an important site in realising an accessible connection with Regent's Park Road and Primrose Hill. This would be a substantial benefit for residents and workers in the Goods Yard area.
- It is recognised that in the short to medium term the site is required for project and construction teams associated with the delivery of HS2. Regardless of whether the site is needed in the long-term for operational railway purposes, the Council wishes to secure public access to the railway bridge at Regent's Park Road, overlooking the site. This should avoid prejudicing a reopening of Primrose Hill station, should this become viable in the future.
- The Council would support railway use being maintained and would also support permanent employment use and permanent self-contained housing where this results in a compatible mix of uses.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) provide types of office or light industrial employment uses that respond to the existing and emerging character of neighbouring sites and the wider Goods Yard area. Priority should be given to employment uses and housing types which meet local needs identified by the Council;
- b) make provision for particular housing needs identified by Policy H6C where appropriate, and consider inclusion of affordable housing for older people or other people with care or support requirements, as part or all of the affordable housing contribution;
- c) contribute towards the delivery of a new route for pedestrians and cyclists adjacent to the West Coast mainline railway that connects Regent's Park Road bridge with Regent's Canal towpath ('Stephenson's Walk'), creating opportunities to reveal, restore and access the heritage assets related to the original railway as set out in the Camden Goods Yard Planning Framework. Developers will be expected to work with adjoining land owners;
- d) be designed to be designed to consider the impacts on locally important views, especially of The Roundhouse;
- e) ensure the design and layout gives careful consideration to its relationship with the adjacent Juniper Crescent site;
- f) consider what noise mitigation measures are likely to be required in line with Policy A4 (Noise Pollution) given its location immediately adjacent to the West Coast Main Line; and
- g) seek to establish a green corridor along the edge of the railway which can act as a buffer and habitat for wildlife in connection with adjacent sites.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 9m -45 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## INFRASTRUCTURE REQUIREMENTS

Development:

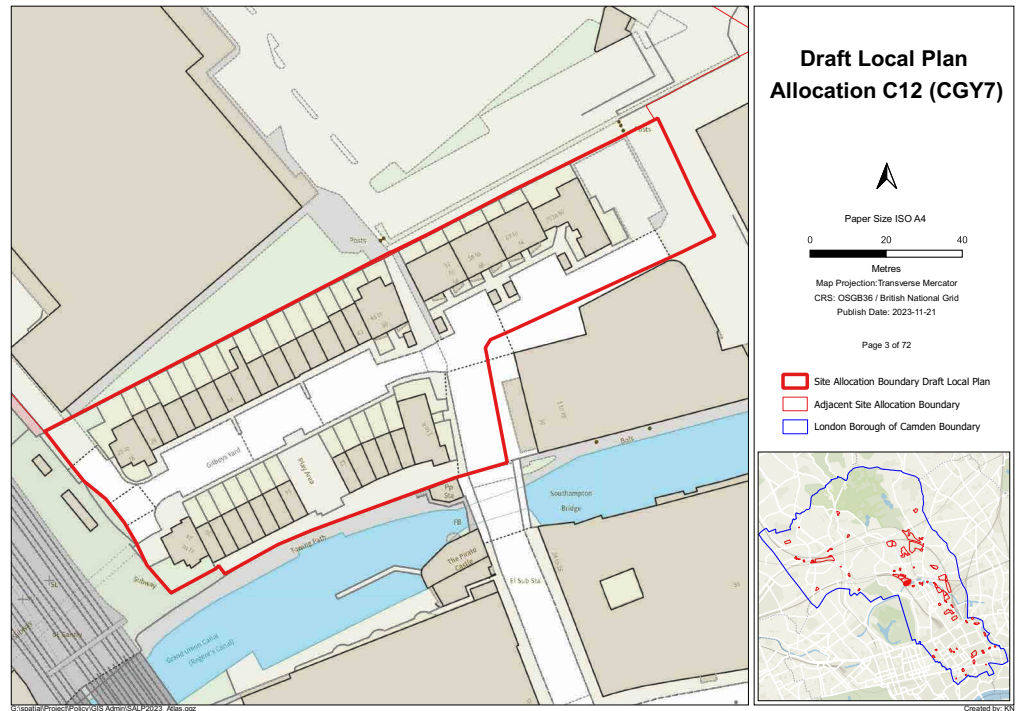
- h) may be able to help address the issues identified in respect of bus operations in adjacent sites (Morrisons supermarket and Juniper Crescent). An operational area could support a bus turning area at the end of the existing access road.

## OTHER CONSIDERATIONS

- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.

## ALLOCATION C12 (CGY7) – Gilbeys Yard

### SITE PLAN



### ADDRESS

Gilbeys Yard housing estate NW1

### AREA

0.8 hectare

### ALLOCATED USE

Permanent self-contained homes, small-scale employment space, community use

### INDICATIVE CAPACITY

120 additional homes

### DESCRIPTION OF EXISTING SITE

Gilbeys Yard is a housing estate consisting of blocks of 3-4 storey flats and houses arranged in rows parallel to the Regent's Canal. The estate currently has limited public amenity space for residents. There is a poorly defined relationship with the adjoining Interchange yard, while a narrow pedestrian and cycle route leads into the Morrisons supermarket site. The estate is prominent in views from the Regent's canal and towpath. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- One Housing Group has been leading a consultation and engagement exercise with the residents of both Juniper Crescent and Gilbeys Yard about improving the standard of existing homes. One option involves the full redevelopment of the estate providing replacement accommodation and additional homes.
- As a pre-condition for funding support from the Mayor of London, housing regeneration schemes are subject to a ballot of residents. A ballot held in 2020 was unsuccessful. Residents have not been balloted again to date.
- In the event that a ballot is successful, a housing-led development would be supported that delivers significant regeneration benefits for the estate and wider Camden Goods Yard area.
- The Council supports the continuing consultation and engagement process led by One Housing Group to evaluate future options for the estate and establish the support of existing residents.
- The inclusion of private homes is supported, to help fund the provision of high quality replacement homes and to maximise delivery of additional affordable housing.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) provide a significant number of new and replacement homes to meet a range of housing needs including the maximum reasonable amount of affordable housing. The exact number of homes will be dependent on a full appraisal of the impacts of development on heritage assets, views and surrounding townscape;
- b) ensure there is no net loss of socially rented floorspace and that all existing households receive suitable replacement accommodation as demonstrated a needs based assessment;
- c) make provision for particular housing needs identified by Policy H6C where appropriate, and consider the inclusion of affordable housing for older people or other people with care or support requirements, as part or all of the affordable housing contribution;
- d) consider the provision of appropriate complementary uses that would enliven streets and spaces, such as workshops or community uses. The site is not considered appropriate for an extension of the Town Centre;
- e) include a housing phasing plan that minimises disruption for residents. Where possible estate residents should only be asked to move home once, with early phases of development being prioritised for decant housing, prior to large scale demolition of existing homes;
- f) be designed to respond to the industrial character of the canal-side environment and wider Goods Yard area in terms of the architectural design and landscaping, taking opportunities to preserve, repair and enhance heritage features, above and below ground, and protect locally important views. The proximity of the site to The Interchange building (Grade II listed) and the impact on the setting and views of this asset are particularly important;
- g) seek to integrate the estate more successfully into neighbouring sites, anticipating how the future context may change;
- h) Work with adjoining landowners to deliver the new route for pedestrians and cyclists called Stephenson's Walk adjacent to the West Coast mainline railway that connects Regent's Park Road bridge with Regent's Canal towpath creating opportunities to reveal, restore and access the heritage assets related to the original railway as set out in the Camden Goods Yard Planning Framework;
- i) seek (in conjunction with the landowner of the Interchange and market) to resolve concerns about the servicing arrangements for the markets and drop-off/collection arrangements by taxis, to minimise impacts of vehicles passing through the estate;
- j) rationalise parking on-site in line with Policy T5 (paring and car free development) and reduce vehicular dominance and undertake refurbishment of the yard to fully express its role as an important communal amenity area; and
- k) improve community safety through natural surveillance of entrances/exits to the estate and homes/apartment blocks;

## INFRASTRUCTURE REQUIREMENTS

Development must:

- l) provide additional open space, including green space, play facilities and tranquil areas;
- m) seek to ensure that open spaces include areas for wildlife and the creation of green routes along the railway edges as part of a continuous corridor adjacent to the West Coast Main Line.

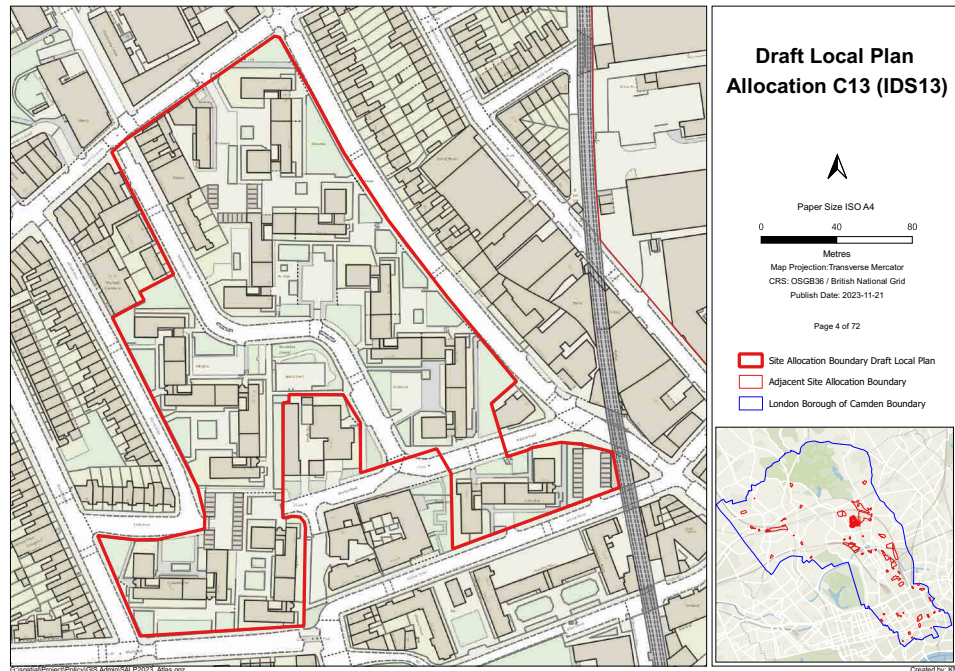


## OTHER CONSIDERATIONS

- The Council will require the developer to provide a Community Support and Engagement Plan which develops a community vision and purpose for the new estate, with assistance provided for volunteering and capacity building initiatives and to give residents a strong sense of ownership of streets/spaces, helping to tackle anti-social behaviour. This should be planned across site boundaries to deliver optimal benefits, including interaction between communities living in different parts of the Goods Yard area and beyond.
- This site is within a Tier II Archaeological Priority Area and so archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required.
- Applicants should refer to the Mayor's Good Practice Guide to Estate Regeneration.

## ALLOCATION C13 (IDS13) – West Kentish Town Estate

### SITE PLAN



<b>ADDRESS</b>	West Kentish Town estate, NW5
<b>AREA</b>	3.5 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	569 additional homes (885 in total)
<b>DESCRIPTION OF EXISTING SITE</b>	The Council estate of 316 homes was constructed in the early 1960s following the demolition of the original Victorian street properties. The original linear routes of Carlton Street and Weedington Road were lost or rerouted when the estate was redeveloped. Parts of the surrounding area retain some of the original historic character, much of which is preserved as part of the West Kentish Town Conservation Area. Notable buildings include the Grade II listed Fiddler’s Elbow pub and Rhyl Primary School. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- The Council adopted the Gospel Oak and Haverstock Community Vision in November 2022 as a Supplementary Planning Document.
- Local engagement work with residents of the estate has identified issues relating to their homes, the estate in general as well as the wider area. There have been particular problems relating to the heating and drainage of some homes, residents say they do not always feel safe due to anti-social behaviour and that they feel cut off from amenities serving the area; green spaces tend to be poor quality and underused, while some households are experiencing overcrowded conditions in homes which do not meet current space standards.
- The Council has assessed different options for the estate and found that it is unlikely to be viable to remedy the design and construction issues affecting the existing buildings. In a ballot in March 2020, an overwhelming majority of residents voted for the complete redevelopment of the estate.
- Careful consideration should be given to the phasing of the development to ensure the balanced delivery of new affordable and market homes.

## **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) deliver regeneration benefits for the wider community that help to address the local priorities set out within the Community Vision;
- b) reprovide existing homes to meet modern standards and the housing needs of residents, ensuring no net loss of council homes, and maximising the delivery of additional affordable housing (above existing);
- c) Make provision for particular housing needs identified by Policy H6C where appropriate, and consider inclusion of affordable housing for older people or other people with care or support requirements, as part or all of the affordable housing contribution;
- d) include a housing phasing plan that minimises disruption for residents. Where possible estate residents should only be asked to move home once, with early phases of development being prioritised for decant housing, prior to large scale demolition of existing homes;
- e) contribute towards the enhancement of the Queen's Crescent neighbourhood centre through the creation of a new frontage along the street to host community or commercial uses, as well as contributing towards the cost of highways and public realm improvements;
- f) improve local walking and cycling routes by providing a clear, safe and accessible route connecting Talacre Park with Queens Crescent;
- g) address the lack of private amenity space and cycle parking facilities identified by residents;
- h) be designed to respect the sensitive heritage constraints including the protected view from Parliament Hill as well as the setting of the adjoining conservation area; and
- i) be designed to be sensitive to the surrounding townscape, including the nearby West Kentish Town and Inkerman conservation areas and nearby listed buildings

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 40m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## **INFRASTRUCTURE REQUIREMENTS**

Development must:

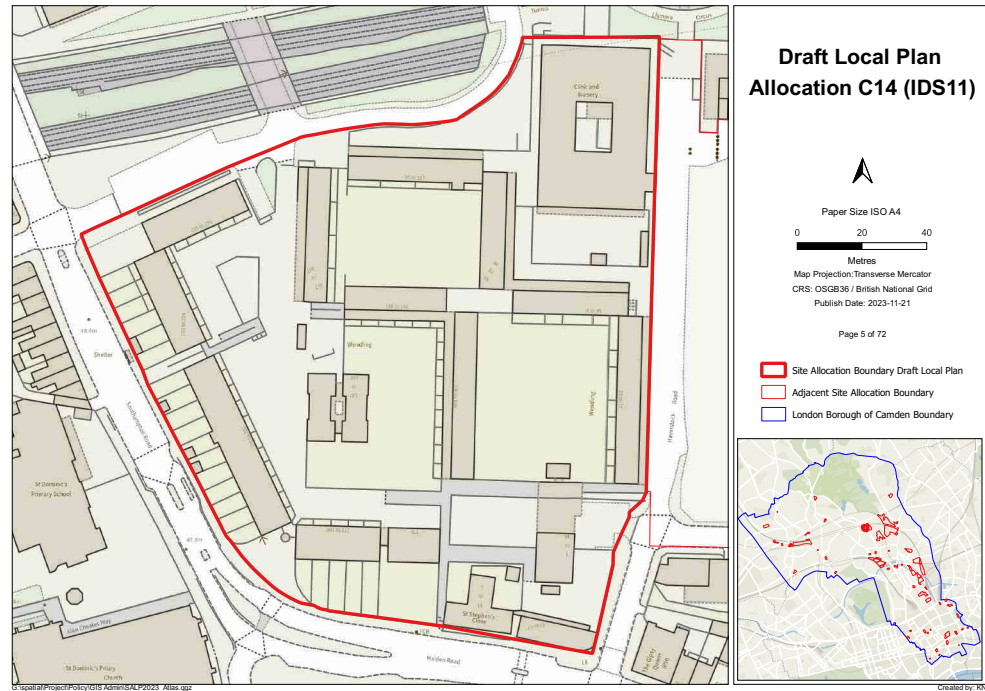
- j) contribute towards the delivery of a new pedestrian and cycle route to provide a direct link to Kentish Town high street and station.
- k) Contribute towards improvements to local open spaces, including exploring making provision for a hierarchy of open spaces including public, semi-public and private spaces with clear thresholds between them and explore opportunities to integrate play within development sites. New/refurbished spaces should provide opportunities for a greater range of users to meet and share experiences by being welcoming and inclusive for all.

## **OTHER CONSIDERATIONS**

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required.
- Applicants should refer to the Mayor's Good Practice Guide to Estate Regeneration

## ALLOCATION C14 (IDS11) – Wendling Estate and St Stephens Close

### SITE PLAN



### ADDRESS

Wendling Estate and St Stephens Close, NW5

### AREA

2.6 hectares

### ALLOCATED USE

Permanent self-contained homes

### INDICATIVE CAPACITY

509 additional homes (750 in total)

### DESCRIPTION OF EXISTING SITE

The site provides 241 existing homes in a mixture of three to four storey blocks that are divided into flats and maisonettes with one block of 10 storeys divided into one bedroom flats.

It is an inward facing deck access estate. Streets surrounding the estate are faced by garages, or back gardens, and entrances to the estate can be perceived as unwelcoming for visitors. The Wendling estate includes a nursery and health centre. The church of St Martins in proximity to the site is Grade I listed. Part of the site is within a viewing corridor set out in the London View Management Framework SPG.

### BACKGROUND

- The Council is preparing development proposals for Wendling Estate and St Stephens Close. This involves the redevelopment of all existing buildings as part of a comprehensive regeneration scheme. The Council undertook a ballot of residents in summer 2021 where residents voted in favour of the proposals to continue based on a comprehensive redevelopment.
- The Council's priority for this site is the reprovizion of existing homes to meet modern standards and the housing needs of residents.
- The Council adopted the Gospel Oak and Haverstock Community Vision in November 2022 as a Supplementary Planning Document.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) deliver regeneration benefits for the wider community that help to address the local priorities set out within the Community Vision;
- b) reprovide existing homes to meet modern standards and the housing needs of residents, ensuring no net loss of council homes, and maximising the delivery of additional affordable homes (above existing);
- c) make provision for particular housing needs identified by Policy H6C where appropriate, and consider inclusion of affordable housing for older people or other people with care or support requirements, as part or all of the affordable housing contribution;
- d) include a housing phasing plan that minimises disruption for residents. Where possible estate residents should only be asked to move home once, with early phases of development being prioritised for decant housing, prior to large scale demolition of existing homes;
- e) consider the provision of active frontages and uses that engage with the street and improve the frontage to Malden Road and Southampton Road;
- f) be designed to embed designing out crime principles in all aspects of the proposal. Any new development should maximise opportunities for the activation of the ground floor via front doors that face public streets and routes or public uses, ensuring clear sightlines and active surveillance and with a clearly defined hierarchy of spaces; and
- g) be designed to be sensitive to the surrounding townscape including the nearby Parkhill and Mansfield conservation areas and nearby listed buildings.

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m – 40m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## INFRASTRUCTURE REQUIREMENTS

Development must:

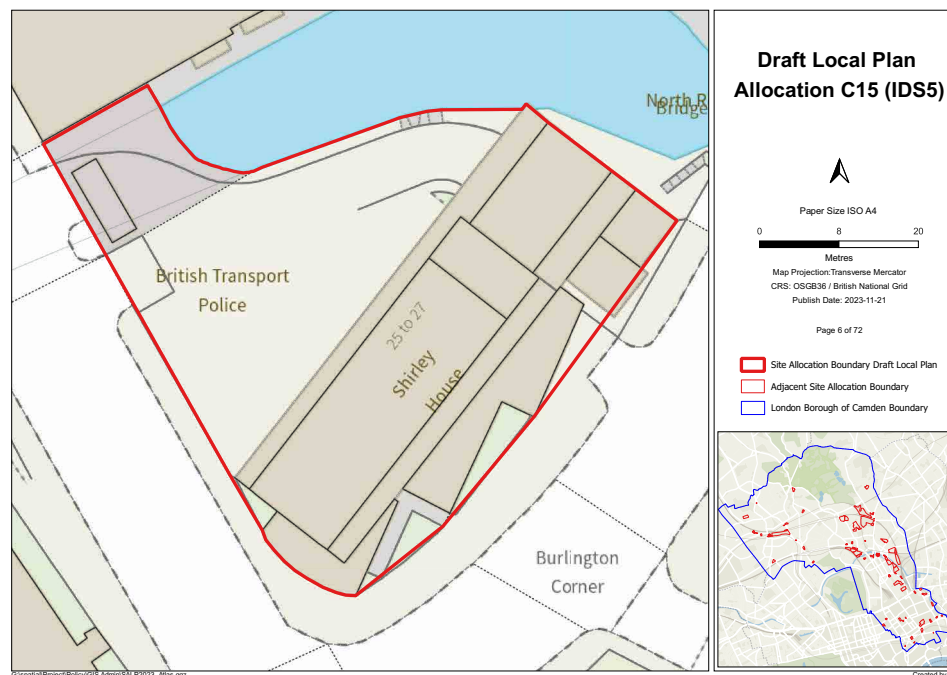
- h) improve pedestrian and cycle permeability, ease of access and accessibility across the site; and explore the opportunity of providing a new route connecting Lismore Circus to St. Dominic's Priory;
- i) explore the re-provision and enhancement of health and community facilities with partners to ensure no net loss in provision. If not re-provided as part of the estate, they should be provided elsewhere in the locality, preferably on sites within the Queen's Crescent neighbourhood centre;
- j) help deliver enhancements to Lismore Circus open space that makes the space safer and more attractive to a wider range of age group; and
- k) explore opportunities arising from the regeneration of Bacton Low Rise to open new routes east and west and improve the estate's connectivity with the surrounding streets.

## OTHER CONSIDERATIONS

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required.
- Applicants should refer to the Mayor's Good Practice Guide to Estate Regeneration

## ALLOCATION C15 (IDS5) – Shirley House

### SITE PLAN



### ADDRESS

Shirley House; 25 -27 Camden Road

### AREA

0.1 hectare

### ALLOCATED USE

Employment (offices), permanent self-contained homes and retail

### INDICATIVE CAPACITY

30 additional homes

### DESCRIPTION OF EXISTING SITE

Shirley House is a 7-storey office building on the corner of Camden Road and Camden Street, within the Regent's Canal Conservation Area. It is occupied by the British Transport Police headquarters with car parking at ground floor and basement levels. Between the building and the canal is a yard used for parking and servicing, protected by security fencing.

### BACKGROUND

- Employment is the priority use for this site, as there is no history of vacancy, and demand for business premises remains high in Camden Town. However, an element of self-contained housing would be supported, as the site is in a sustainable location and a more efficient use of the site would be welcomed.
- A hotel use in this location is unlikely to be appropriate as the site is not in a town centre location.
- The [Regent's Canal Conservation Area Appraisal](#) identifies the existing office building as having a negative impact on the townscape, due to its undistinguished architectural quality, poor relationship with the canal and effect in obscuring views of the listed Camden Bridge.

### DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) consider opportunities to make more efficient use of the site, through the extension and alteration of the existing building. Where demolition is proposed, this will be considered in accordance with the criteria set out in Policy CC2 (repurposing, refurbishment, and re-use of existing buildings);



- b) retain as much employment floorspace as possible. Employment floorspace must meet a range of needs in Camden Town including SMEs (small to medium enterprises) and move on space for expanding businesses;
- c) consider the provision of residential floorspace (subject to viability) provided it does not impact the continuing use of the site for employment. The introduction of small-scale retail or café uses at pavement level to provide activity and natural surveillance would be supported;
- d) ensure the design, layout and orientation of development positively relates to the canal and local character;
- e) consider enhancing views of the listed Camden Bridge through the removal of the viewing platform;
- f) establish a strong building line along Camden Road and Camden Street to enhance the street scene; and
- g) explore opportunities to incorporate measures to manage the effects of lighting on the canal, to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.

**INFRASTRUCTURE REQUIREMENTS**

Development must:

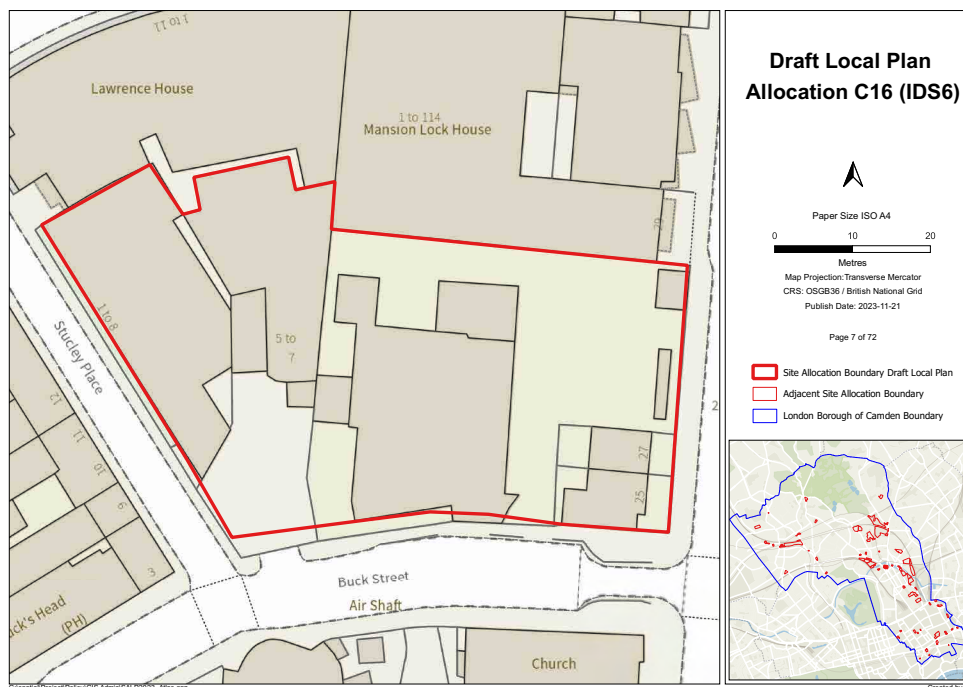
- h) contribute to improvements in the biodiversity of the canal which is designated as a Site of Importance for Nature Conservation, this could be through measures such as floating reedbeds.

**OTHER CONSIDERATIONS**

There is a critical trunk sewer running through this site which would need to be appropriately considered through the planning and design stage.

## ALLOCATION C16 (IDS6) - Camden Town over station development

### SITE PLAN



**ADDRESS** 1-8 Stucley Place, 5-7 Buck Street and 25-27 Kentish Town Road

**AREA** 0.27 hectares

**ALLOCATED USE** Permanent self-contained homes, employment uses (maker spaces/creative industries/offices), retail and food & drink uses (ground level)

**INDICATIVE CAPACITY** 60 additional homes

**DESCRIPTION OF EXISTING SITE** Camden Town over station development site is located in the heart of Camden. TfL have acquired land to facilitate construction work associated with the station capacity project and to ensure the existing station entrance can stay open. The site includes 5-7 Buck Street which formerly served as an auction house and has more recently served as temporary affordable workspace for young entrepreneurs. The former Hawley Wharf infant school building was vacated in 2016, when the school relocated and has also been in temporary use.

### BACKGROUND

- A proposed station capacity upgrade remains a Transport for London (TfL) ambition within the plan period, but sufficient funding needs to be secured.
- Subject to funding being secured, delivery of the station capacity upgrade and a new station entrance will be contingent on a Transport and Works Act Order being confirmed by the Secretary of State, and therefore planning permission for these works are not required. The over-station development will however require a planning application to be submitted.
- The Council will expect landowners and developers to take a collaborative approach, working across site boundaries, to ensure a well-designed and successfully implemented scheme. A shared site agreement should be agreed between the main contractor for the station capacity project and the developer of construction works above the station, to ensure impacts on TfL's assets are appropriately assessed.

- The site is allocated for mixed use development incorporating a new station entrance and ancillary supporting facilities for the station, permanent self-contained homes, and employment uses including retail along the Buck Street and Kentish Town Road frontages.
- The Council may seek to use planning conditions to ensure the long term retention of employment floorspace within Use Class E from conversion to other town centre uses.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- provide a range of employment uses, giving consideration to uses/ activities that have an established and growing presence in Camden Town, including premises for use by creative and cultural businesses, light industrial workshops, co working space and space suitable for small and medium sized businesses;
- not cause harm to the continuing operation of uses on nearby sites including Buck Street Market and the Electric Ballroom;
- be designed to provide frontages that engage with the street along Buck Street and Kentish Town Road, with a continuous building line established along Buck Street;
- include noise mitigation measures to ensure that the ability of existing premises to operate effectively is not adversely affected in line with the agent of change principle, i.e., the party responsible for a change should also be responsible for managing the impact of that change;
- carefully consider the layout and design of the residential accommodation given its proximity to the station entrance and the levels of pedestrian activity that are anticipated when it is operational;
- provide a range of unit sizes, appropriate to the context of Camden Town's retail role and function and the size/location of this site and incorporate food and drink uses must only be provided where the impacts can be fully mitigated;
- be designed to integrate successfully into the surrounding area in terms of scale, height and massing, achieving a positive relationship with the Camden Town Conservation Area and Regent's Canal Conservation Area. This is likely to involve a transition in height and scale across the site from the more intimate, low-rise nature of Stucley Place to Kentish Town Road, which is generally lined by buildings of 4-5 storeys south of Hawley Crescent;
- explore the creation of a new civic space in front of the station entrance to create a strong 'sense of arrival' as people approach the new station entrance. This would be contingent on restricting access along part of Buck Street during certain times of the day or on a more permanent basis;
- improve the street environment in this area, particularly Buck Street, to ensure that it is easy and safe to move through and designed to be inclusive, to meet the needs of all residents; to ensure that it improves the accessibility of this area for everyone, particularly people using wheelchairs and people with physical disabilities; provision of wider pavements along Buck Street and wayfinding measures for visitors and tourists could assist with this;
- incorporate appropriate acoustic measures to address noise from the evening and night time operation of the station; the movement of people through the area; and the residual transmission of noise and vibration from the underground station and platforms; and

## INFRASTRUCTURE REQUIREMENTS

Development must:

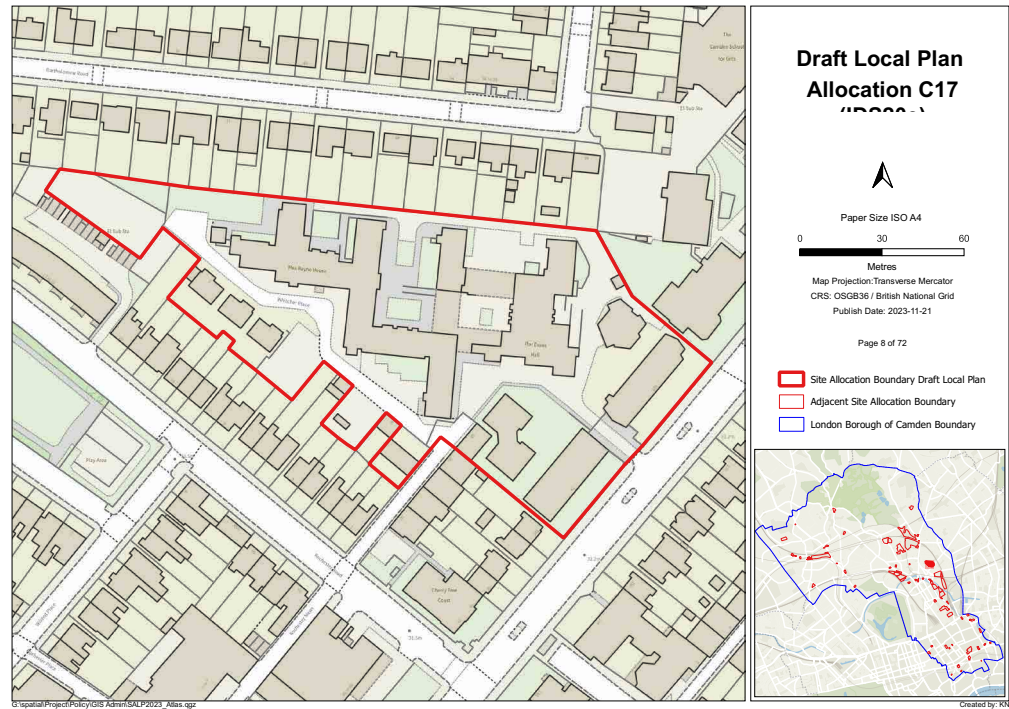
- l) provide step free access to the underground station;
- m) work effectively alongside Transport for London's existing, enhanced or new infrastructure;
- n) Make contributions to public realm improvements. Priorities include widening of pavements, protecting and enhancing cycle lanes; and
- o) explore opportunities for decentralised heating and cooling (including the ability of the Underground station to supply development above ground).

## OTHER CONSIDERATIONS

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- The Hawley Wharf school building is on the Council's [Local List](#) due to its architectural and townscape significance. The auction house/piano factory (5-7 Buck Street), while not having any formal heritage status, is recognised as having merit in conservation and design terms. Demolition of these buildings may not require planning permission where such works are confirmed by the Secretary of State through a Transport and Works Act Order. However, the existing quality of the buildings, their heritage value, their embodied carbon, and the uses they support, should inform development requiring consent from the local planning authority and the loss of these buildings is unlikely to be acceptable without the station works coming forward on this site. The residential capacity of 60 would therefore not apply and would need to be re assessed).

## ALLOCATION C17 (IDS20e) - UCL Camden Campus; 109 Camden Road

### SITE PLAN



<b>ADDRESS</b>	109 Camden Road, London, NW1 9HZ
<b>AREA</b>	1.52 hectares
<b>ALLOCATED USE</b>	Housing (Student accommodation)
<b>INDICATIVE CAPACITY</b>	180 additional student units
<b>DESCRIPTION OF EXISTING SITE</b>	<p>The site forms a triangular shape on a plot of land to the rear of properties along Bartholomew Road (north) and Rochester Road (south) and bound to the east by Camden Road. There are two access points to the site. One from Camden Road, along the south-east boundary, and the other from Rochester Mews to the south. The site is gated and secure and has no public access through the site.</p> <p>The site largely comprises student accommodation (714 existing rooms) with floorspace also provided for a reception area and communal areas for students. The buildings on site appear to have been built in phases between the 1960s and 1990s.</p> <p>Part of the south of the site is within the Rochester Conservation Area. Part of the site is within a viewing corridor set out in the London View Management Framework SPG. The site is adjacent to the Kentish Town Neighbourhood Plan area to the north. The Grade II listed no.123 &amp; 125 Camden Road are located approximately 75m to the north-east of the site.</p>
<b>BACKGROUND</b>	
The whole site provides student accommodation for UCL students in several separate buildings.	
<b>DEVELOPMENT AND DESIGN PRINCIPLES</b>	
Development must:	
a) Ensure that any proposed increase in height is focussed in the central part of the site to reduce the impact on surrounding areas and adjacent heritage assets;	

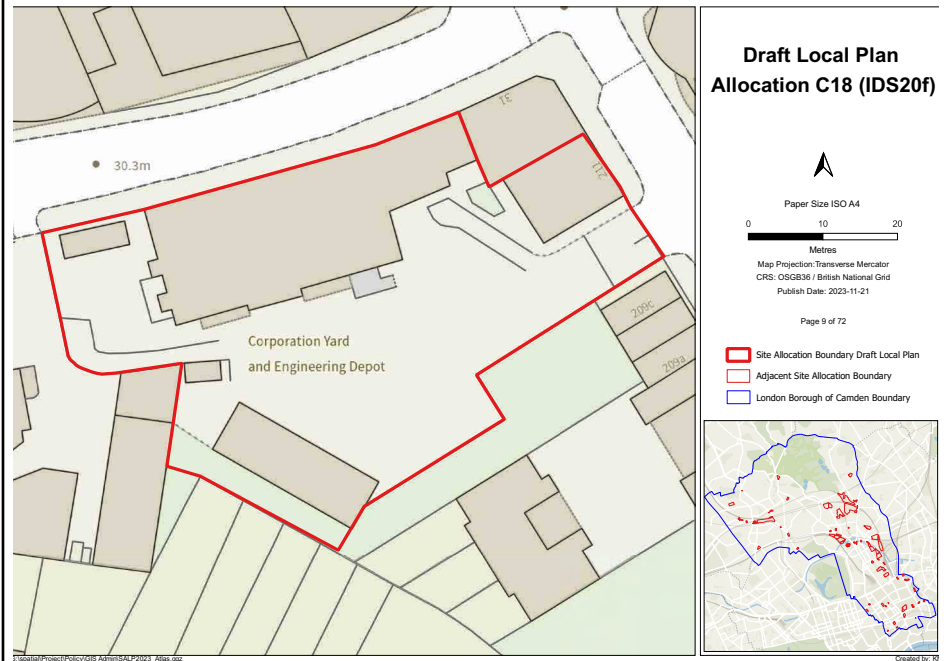
- b) Ensure massing and heights on boundaries adjacent to residential uses safeguard the amenity of neighbouring residents;
- c) Ensure that existing open space is safeguarded and new or enhanced open space is provided and designed to comply with Policy SC3 (open space). As part of this, development should explore opportunities to increase green amenity spaces between the buildings on site, including retaining existing trees and incorporating additional trees and vegetation wherever possible, in accordance with Policy NE3 (tree protection and planting); and
- d) Protect existing allotments and food growing on site in accordance with Policy SC4 (food growing) and safeguard existing sports and recreation facilities on site (including the tennis courts) in accordance with Policy SC2 (social and community infrastructure).

#### **OTHER CONSIDERATIONS**

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.

## ALLOCATION C18 (IDS20f) – Arlington Road former depot site

### SITE PLAN



<b>ADDRESS</b>	211 Arlington Road, London, NW1 7HD and 33-35 Jamestown Road, NW1 7DB
<b>AREA</b>	0.2 ha
<b>ALLOCATED USE</b>	Employment and permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	66 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site is located on the corner of Arlington Road and Jamestown Road. The site is located immediately adjacent to, but outside of, Camden Town town centre.

### BACKGROUND

The site was until recently used by Camden Council as offices as a base for its street cleaning services. The depot buildings are generally low rise and have a functional appearance, commensurate with the uses they support.

### DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- be designed to ensure that the operation of existing, or future, employment uses on the site are not compromised by the introduction of housing;
- explore opportunities to create a more active and engaging street frontage along Arlington Road and Jamestown Road;
- ensure it relates successfully to the existing public house on the corner of Arlington Road / Jamestown Road, which is a locally listed building, and avoid any adverse impact on its continuing operation; and
- be designed giving careful consideration to scale and massing due to the potential impact on designated conservation areas nearby and neighbouring occupiers.

**4.13** The following table identifies further site allocations in the central area of the borough, many of which are already subject to planning permission, and sets out key considerations for each site.

Ref*	Address	Allocated uses	Indicative capacity	Key Considerations
C19 (KT7)	Highgate Centre, Highgate Road	Permanent self-contained homes, community use	47 additional homes	Under construction
C20 (IDS8)	Grand Union House, 18 – 20 Kentish Town Road	Employment (office) retail (ground floor) and self-contained homes	6 additional homes	<p>The Council has resolved to grant planning permission for 4000 sq m additional employment space and 6 homes.</p> <p>A contribution to delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2, which has been assessed as 6 additional homes in the context of the development with a resolution to grant consent, but should relate to the scale of all additional floor area (GIA) proposed)</p>
C21 (IDS20g)	Heybridge garages, Hadley Street	Permanent self-contained homes	10 additional homes	Part of the Council's small sites programme
C22 (IDS20j)	Bacton Low Rise, Haverstock Road	Permanent self-contained homes	148 additional homes	<p>Planning permission granted (earlier phase completed).</p> <p>The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 40m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.</p>



Ref*	Address	Allocated uses	Indicative capacity	Key Considerations
C23 (IDS20m)	Former Charlie Ratchford centre	Permanent self-contained homes	115 additional homes	Under construction
C24 (IDS20u)	52 Avenue Road	Permanent self-contained homes	12 additional homes	Planning permission granted with a planning obligation for delivery of 8 additional homes off site at Canfield Place.
C25 (NEW)	5-17 Haverstock Hill (Eton garages)	Permanent self-contained homes, retail uses	77 additional homes	Planning permission granted.

\*Previous policy reference used in the draft Site Allocations Local Plan 2020 is shown in brackets

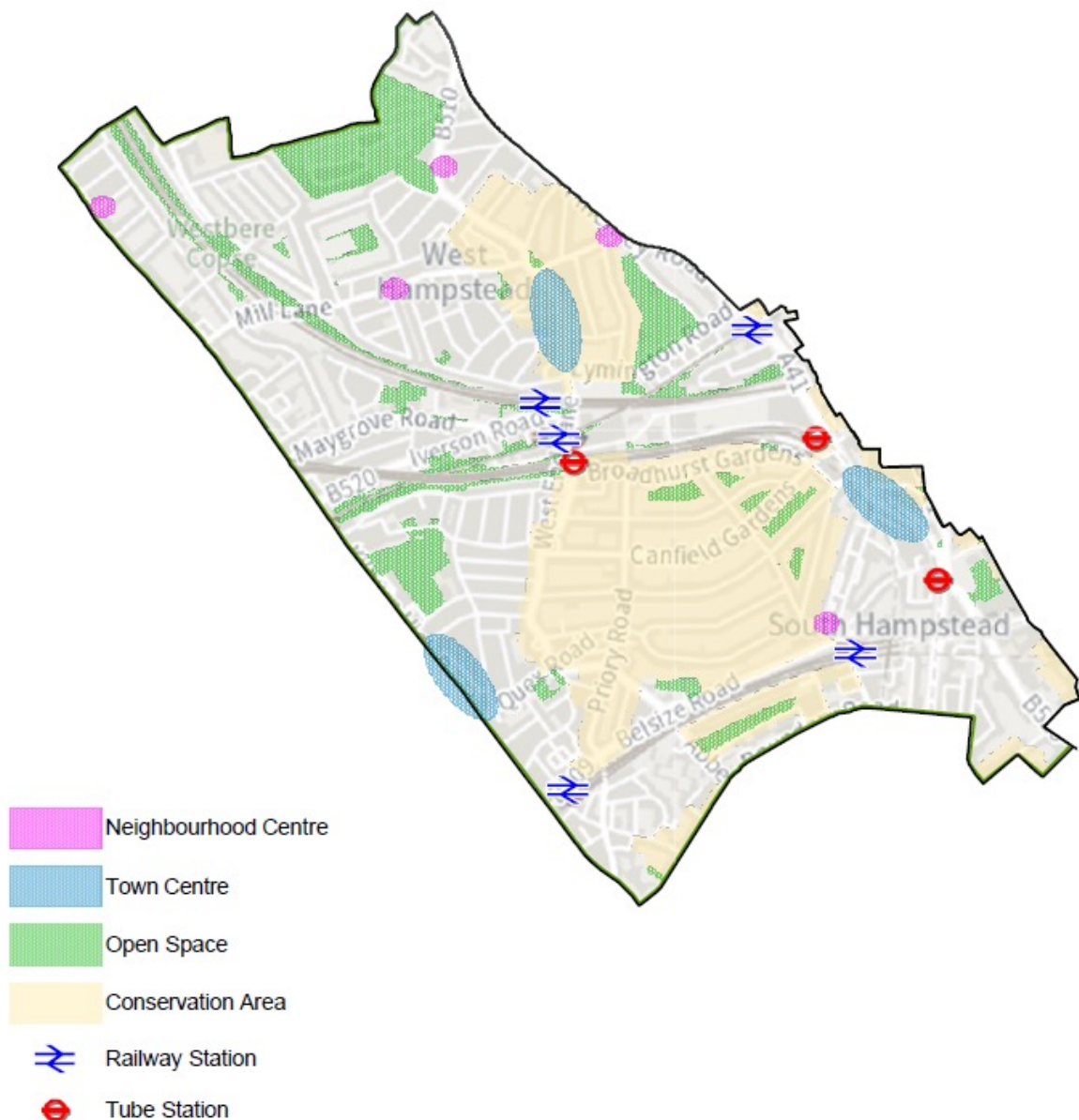
# West Camden



# Chapter 5: West Camden

5.1 The West of the borough includes the neighbourhoods of Kilburn, Fortune Green, West Hampstead, South Hampstead and Finchley Road/ Swiss Cottage. The area is predominantly residential in character, comprising a mixture of Victorian villas and terraces and post war estates, with pockets of inter-war housing and more modern development. Large parts of this area are also designated as conservation areas, and there are a number of listed and locally listed buildings.

Map 6 – West Area



5.2 The area contains three town centres: Kilburn High Road, Finchley Rd/ Swiss Cottage and West Hampstead, in addition to several neighbourhood centres. These centres act as vibrant community hubs, providing retail and leisure uses, community facilities and employment uses.

- 5.3** Kilburn High Road is Camden's second largest town centre. It is divided by the busy A5 which forms the borough boundary between Camden and Brent. The east side of the town centre is in Camden and the west side is in Brent. Kilburn High Road has an offer which reflects its diverse community, with restaurants serving food from all around the world. It also has a lively night-time offer including restaurants, the Kiln Theatre and cinema, and performance and entertainment venues in its pubs. The centre is also home to a number of community and healthcare facilities, in addition to Kilburn library.
- 5.4** Finchley Road/ Swiss Cottage is the third largest town centre in the borough and runs either side of the busy A41 Finchley Road, which creates a barrier between the two sides of the centre, restricting pedestrian movement and creating a poor environment for visitors. The town centre provides a significant convenience goods role in the borough, serving local needs and those from a wider catchment. The main retail offer is however provided in the O2 Centre, which is allocated in this Plan for mixed-use redevelopment, including retail and leisure. The centre is home to several cultural, community and healthcare facilities, including the Swiss Cottage library, Hampstead Theatre and the Swiss Cottage community centre. A cinema and the Swiss Cottage Leisure Centre are also located in the south of the town centre.
- 5.5** West Hampstead is the smallest town centre in Camden and is characterised by independent shops, cafes and restaurants. The centre has a pleasant shopping environment and is popular with residents and visitors. The centre is also home to West Hampstead library.
- 5.6** These town centres also serve a local economic function, providing secondary office accommodation, generally in small to medium premises. There are also clusters of industrial land around West Hampstead and Kilburn providing space for a variety of different uses.
- 5.7** The area has good public transport connections, with six mainline stations at West Hampstead Thameslink, West Hampstead Overground, South Hampstead Overground, Finchley Road and Frognal Overground, Kilburn High Road Overground and Brondesbury Overground; three underground stations at West Hampstead, Finchley Road and Swiss Cottage; and local bus routes. However, there are areas in the West of the borough, mainly around Fortune Green, that have lower levels of public transport accessibility.
- 5.8** Key areas of open space provision in the West of the borough include: Hampstead Cemetery, Fortune Green, Maygrove Peace Park, Kilburn Grange Park, Ainsworth Park and Swiss Cottage Open Space. In addition to this, there are five Sites of Importance for Nature Conservation (SINCs) in this area. These sites contribute to the borough's biodiversity and provide a focus for nature conservation activities in Camden. Whilst most of the West of the borough is well served by open space, the areas of South Hampstead and Kilburn remain comparatively less well served.
- 5.9** The West of the borough is covered, in part, by the Fortune Green and West Hampstead Neighbourhood Plan, which sets out the community's aspirations and planning policies for that area. The Neighbourhood Plan is part of the Council's statutory development plan and is considered, alongside our own policies, when making decisions on planning applications in that area. A Neighbourhood Area has

also been designated in Kilburn. This is a cross boundary area, which extends into Brent. The Neighbourhood Forum is in the process of preparing a Neighbourhood Plan for the area, with support from the London Borough's of Camden and Brent.

- 5.10** A number of opportunities exist in this area to deliver new homes, jobs and infrastructure to support Camden's communities, the most significant being on the site of the O2 Centre, car park and car showrooms, where the opportunity exists to create a new neighbourhood, to provide a mix of uses including housing, complementary commercial and town centre uses, including retail and health/ community facilities. The policy below sets out the Council's strategy for the West of the borough to guide the future development of this area.

## **Policy W1 – West Camden**

- A.** Development coming forward in the West of the borough will be expected to make a positive contribution to Camden's communities, to deliver social, economic and environmental benefits to residents in accordance with this Local Plan and the Fortune Green and West Hampstead Neighbourhood Plan.

### **New homes**

- B.** Sites have been allocated in the West of the borough to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocations set out below.
- C.** The greatest concentration of development in the West of Camden will be the area between West End Lane in West Hampstead and the Finchley Road, which is currently occupied by the O2 centre, other retail uses and associated car parking.
- D.** The O2 centre site has the potential to become a vibrant and diverse new neighbourhood that integrates seamlessly into the wider area and delivers a significant increase in the number of permanent self-contained homes; town centre uses including retail and leisure; health and community facilities; employment floorspace; and open space. Sites have been allocated here to deliver approximately 1,800 new homes. To deliver the Council's and community's visions and objectives for this area, we will expect development to be taken forward in accordance with the West End Lane to Finchley Road Supplementary Planning Document and the Fortune Green and West Hampstead Neighbourhood Plan.
- E.** The Council is committed to a programme of estate renewal and regeneration delivered through the Council's Community Investment Programme (CIP). The main focus of this work in the West of the borough is the Abbey Road Community Housing Site in Kilburn. Development coming forward in the West of the borough will be required to support the Council's estates mission and assist with the delivery of the Council's priorities for nearby housing estates.
- F.** Where windfall sites come forward for housing development in this area, these will be determined in accordance with the policies in the Plan.

## Employment and the Economy

- G. New employment floorspace will be delivered in the West area of the borough through site allocations, existing planning permissions and the development of windfall sites.
- H. The Council will manage and protect the stock of offices in the West of the borough. Proposals for small scale office provision will be supported in West Hampstead, Kilburn High Road and Finchley Rd/ Swiss Cottage town centres and neighbourhood centres in this area where this is of a commensurate scale for its location, in line with Policy IE2 (Offices).
- I. The Council will continue to manage and protect the supply of industrial land in this area in line with Policy IE3 (Industry).

## Retail and Town Centres

- J. The majority of new retail development in the West of the borough is expected to be delivered through the development of the O2 Centre, car park and car showrooms.
- K. The Council will continue to support and protect the town centres of Kilburn High Road, Finchley Rd/ Swiss Cottage and West Hampstead, and the Neighbourhood Centres in the West of the borough, to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors in line with the relevant policies set out in the Plan, with any additional shopping and leisure uses to be provided in accordance with Policy IE6 (Supporting town centres and high streets).

## Infrastructure

- L. To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure, from appropriate development. The Council will work with relevant providers to secure the infrastructure needed to support development and provide the facilities needed for the area's communities. Key priorities for the West of the borough include:
  - i. The delivery of a new link / step free access into West Hampstead and/or Finchley Road Underground stations;
  - ii. The creation of attractive and safer walking, wheeling and cycling routes both into and through the area to deliver the priorities set out in the Council's Transport Strategy and Cycling Action Plan;
  - iii. Improvements to the street environment and public realm particularly around the three West Hampstead stations and along West End Lane, Blackburn Road and Finchley Road, through measures such as tree planting, greening, biodiversity enhancements, improved crossings and wider pavements;
  - iv. The delivery of a new health centre and community facilities as part of the re-development of the O2 Centre, car park and car showrooms;
  - v. The delivery of new public open space as part of the re-development of the O2 Centre, car park and car showrooms;

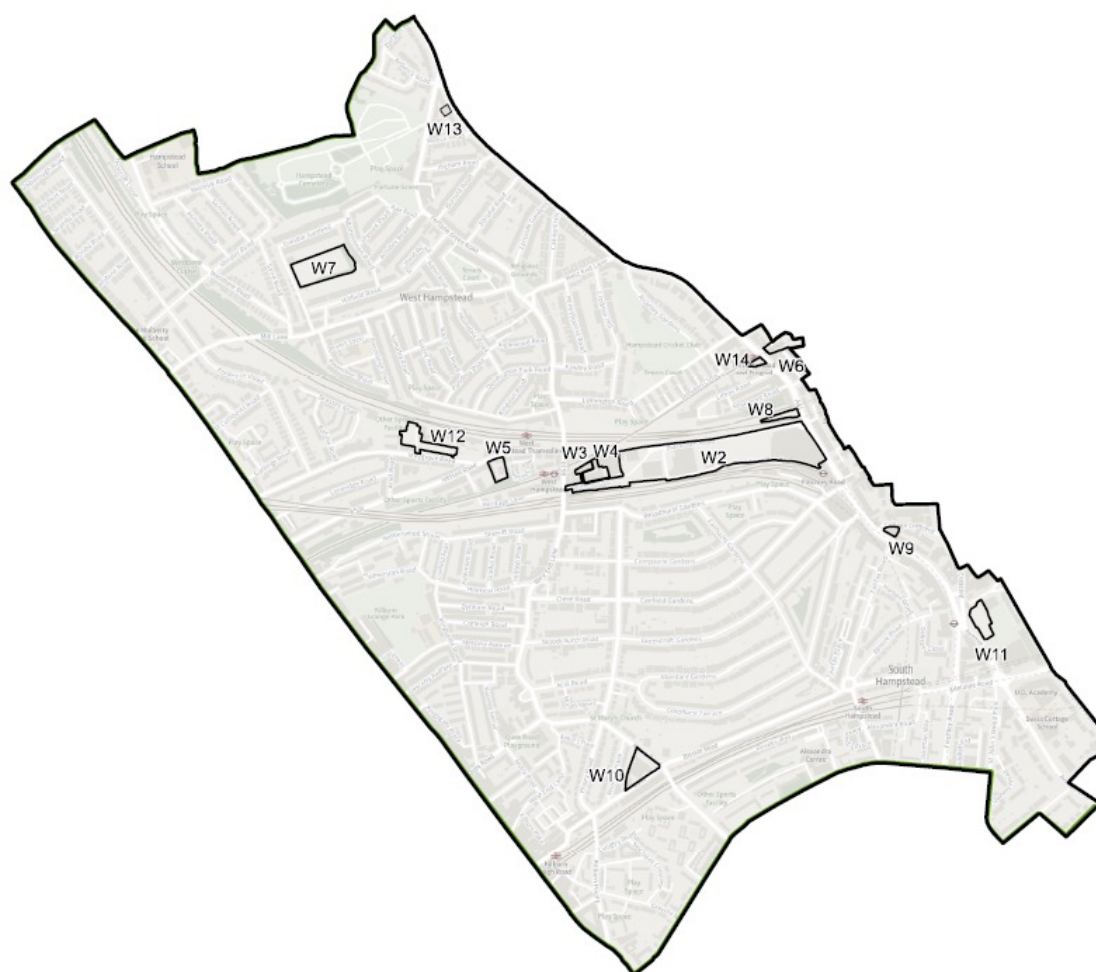
- vi. The delivery of flood mitigation measures and sustainable drainage schemes;
- vii. Greening and biodiversity enhancements;
- viii. The provision of infrastructure for supporting local energy generation;
- ix. Delivering new and enhanced areas of public open space and play space, and improving access to nature, in line with Policy SC3 (open space);
- x. The roll-out of the Council’s neighbourhood-based Safe and Healthy Streets schemes across this area, including reductions in through-traffic.

**5.11** Information on key infrastructure programmes and projects in the West of the borough are set out in Appendix 1.

## Site Allocations

**5.12** A number of site allocations are proposed in the west of the borough, and these are identified on Map 7 and listed in the table below.

**Map 7 – Proposed Site Allocations in the West of the borough**



**Table 3 – Proposed Site Allocations in the West of the borough**

Site Reference	Previous Policy Reference*	Site Name
W2	(WHI2)	O2 Centre, carpark and car showroom sites and 14 Blackburn Road
W3	(new)	11 Blackburn Road
W4	(WHI3)	13 Blackburn Road
W5	(WHI4)	188-190 Iverson Road
W6	(IDS9)	Meridian House
W7	(IDS10)	Gondar Gardens
W8	(WHI5a)	Land at Midland Crescent, Finchley Road
W9	(IDS20h)	BP Petrol Station, 104A Finchley Road
W10	(IDS20q)	Abbey Co-Op Housing Site, Emminster and Hinstock
W11	(IDS20v)	100 Avenue Road
W12	(IDS20z)	Former Liddell Road Industrial Estate
W13	(new)	551-557 Finchley Road
W14	(new)	317 Finchley Road

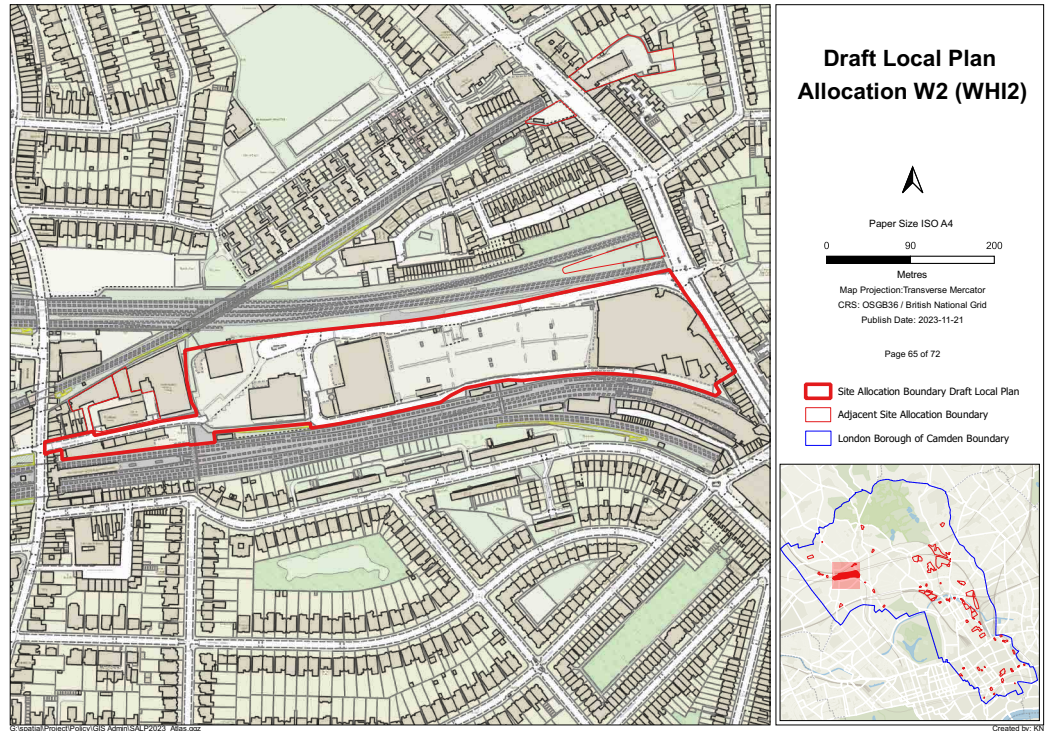
\*Previous policy reference used in the draft Site Allocations Local Plan 2020

**5.13** Policies to guide the development of these sites are set out below. Where indicative housing capacities are identified for sites, it is important to note that these are not fixed figures that must be adhered to exactly. A larger number of homes may be supported where it is shown that this 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, and 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.



**ALLOCATION W2 (WHI2) - O2 Centre, car park, car showrooms and 14 Blackburn Road**

**SITE PLAN**



<b>ADDRESS</b>	O2 Centre, car park, car showrooms and 14 Blackburn Road, West Hampstead, NW6
<b>AREA</b>	5.7 hectares
<b>ALLOCATED USE</b>	Mixed use development including permanent self-contained homes, town centre uses including retail and leisure uses, community uses, employment and open space
<b>INDICATIVE CAPACITY</b>	1800 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site comprises of the O2 commercial centre, associated car parking, a retail warehouse, two car showrooms, which are all accessed from Finchley Road and a builder's merchant on Blackburn Road accessed from West End Lane. The site is between railway lines to the north and south and Finchley Road to the east.

**BACKGROUND**

- Most of the site is identified in the Fortune Green and West Hampstead Neighbourhood Plan as a part of the Growth Area and a key potential development site. Clear objectives are set out for this site in the Neighbourhood Plan and the adopted West End Lane to Finchley Road Supplementary Planning Document. (2021)
- The Council has resolved to grant planning permission 2022/0528/P (subject to referral to the Mayor), approving a masterplan for redevelopment of the whole site, which is divided into three phases. The Council has resolved to grant full planning permission for the first phase of the site (former Homebase store and part of the existing car park) and outline permission for the two other phases, subject to detailed reserved matters submissions.
- The Council supports comprehensive development here, rather than piecemeal proposals for the site. Development should be delivered through a masterplan process informed by the West End Lane to Finchley Road Supplementary Planning Document.

## DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) deliver a new place that responds to neighbouring areas and establishes its own qualities as a new neighbourhood through excellent design and architecture in accordance with Policy D1 (achieving design excellence);
- b) be residential led, providing a substantial number of permanent self-contained homes, affordable homes and a mix of types, sizes and tenures, including a significant proportion of homes for families, in accordance with the housing policies in the plan. The applicant will also be required to explore opportunities to deliver provision for older people or other people with care or support requirements, as part of the overall affordable housing provision;
- c) ensure new employment floor space is designed to be accessible to a range of small to medium businesses and provide affordable workspace in accordance with Policy IE4 (affordable workspace);
- d) ensure that new and/or reprovided town centre uses are focused towards the designated Finchley Road / Swiss Cottage town centre;
- e) make provision for leisure uses on site, including a cinema. Any new retail or leisure uses must be provided in accordance with Policy IE6 (supporting town centres and high streets);
- f) contribute towards the provision and/or improvement of appropriate community facilities or services to meet increased resident needs in accordance with Policy SC2 (social and community infrastructure);
- g) include the provision of public toilets, including changing places toilets, and free drinking water;
- h) ensure that car parking provision, except for essential users and car clubs, is removed;
- i) ensure that layout and access gives pedestrians, people using wheelchairs, cyclists and public transport accessibility priority over the operational, servicing and parking demands of vehicles;
- j) include new and improved public realm and public open spaces that are fully accessible to the community, workers and visitors to the area. These should be of different forms, and functions, related to the location, and the uses and activities, they serve; and
- k) improve biodiversity and ecological connectivity and deliver urban greening measures on the site in accordance with Policy NE2 (biodiversity).

The Camden Building Heights Study has identified this site as a location where tall buildings may be an appropriate form of development, with 9m - 54m considered the potentially appropriate height range. It notes that the Council has resolved to grant planning permission for a development ranging in height from 33 - 61m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

## INFRASTRUCTURE REQUIREMENTS

Development must:

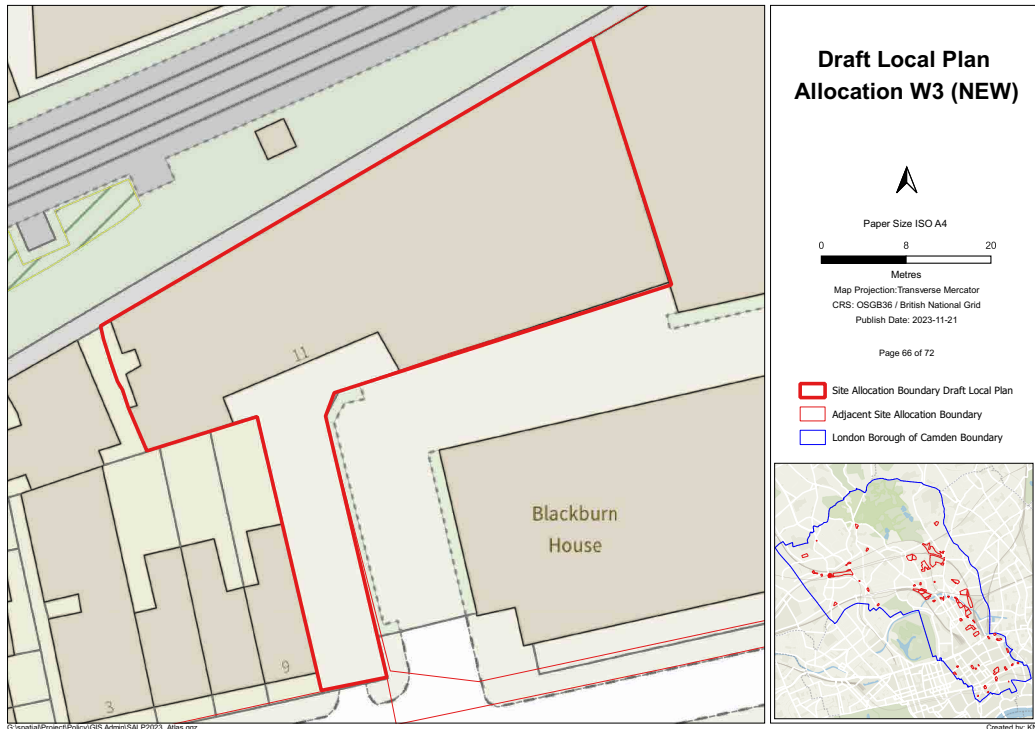
- l) contribute to the delivery of a new link / step free access into West Hampstead and Finchley Road underground stations and provide appropriate financial contributions to support accessibility and capacity improvements;
- m) deliver a strong, convenient, direct, safe and accessible east-west route linking Finchley Road with West End Lane including substantial improvements to the western end of Blackburn Road cul-de-sac. This route should be accessible to all, welcoming, safe, green, well lit, overlooked and inclusive to meet the needs of pedestrians, people using wheelchairs and cyclists rather than motor vehicles;
- n) deliver improvements to bus stop facilities both within and in the vicinity of the site;
- o) incorporate pedestrian, cycling and environmental improvements to ensure the development is fully integrated and accessible to the wider area;
- p) make provision for of a new NHS health centre;
- q) secure physical improvements to Billy Fury Way and Granny Dripping steps to improve access into the site;
- r) secure walking and cycling improvements to Finchley Road including enhanced surface level crossing and improvements to junction with Blackburn Road;
- s) provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible;
- t) contribute towards bus priority and cycle infrastructure improvements along West End Lane; and
- u) improve the Blackburn Road and West End Lane junction.

## OTHER CONSIDERATIONS

- A Flood Risk Assessment will be required in accordance with Policy CC11 (flood risk), as the site is within an area identified by the Council as being at risk of flooding, and parts of the site have experienced problems with flooding in the past.
- Sustainable Urban Drainage Systems will be required on this site in accordance with Policy CC12 (sustainable drainage). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- An integrated servicing and vehicle access strategy that does not detrimentally impact the quality of walking and cycling routes, spaces and public realm must be provided.

## ALLOCATION W3 (New) – 11 Blackburn Road

### SITE PLAN



<b>ADDRESS</b>	11 Blackburn Road; West Hampstead, NW6 1RZ
<b>AREA</b>	0.15 hectares
<b>ALLOCATED USE</b>	Mixed use including commercial and permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	14 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site is accessed from a driveway from Blackburn Road and is adjacent to Billy Fury Way. There are two warehouse buildings on site in use as artist studios, one is a Victorian warehouse and the other a 20 <sup>th</sup> Century building. The site is close to but outside of West Hampstead Town Centre.

### BACKGROUND

- The site is identified in the Fortune Green and West Hampstead Neighbourhood Plan as a part of the Growth Area and a potential development site. Clear objectives are set out for this site in the adopted West End Lane to Finchley Road Supplementary Planning Document. (2021) and Neighbourhood Plan
- Planning permission (2015/3148/P) was previously granted for refurbishment of the Victorian warehouse for business use and six, three bedroom houses.
- It is expected that development will consider adjacent sites' redevelopment plans and take opportunities to work in conjunction with neighbouring sites (particularly 13 Blackburn Road) to help deliver a coordinated approach to development here.

### DEVELOPMENT AND DESIGN PRINCIPLES

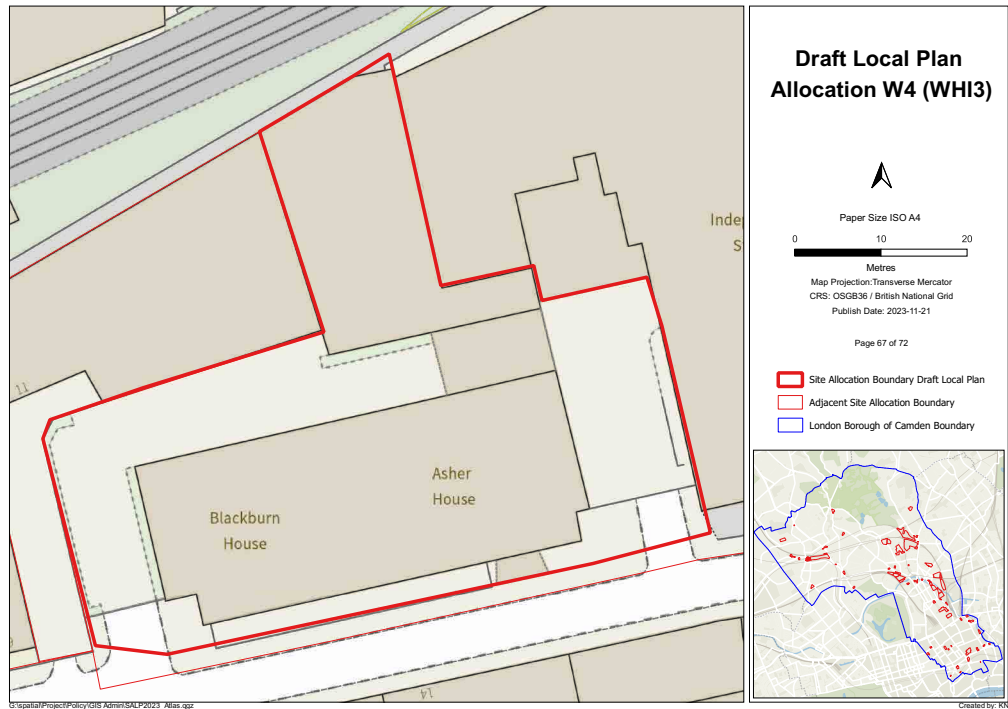
Development must:

- a) prioritise the retention of the Victorian warehouse building (which is a non-designated heritage asset), as it is considered to be of high architectural quality and worthy of retention, due to its attractive character;
- b) reprovide existing employment floor space, and seek to incorporate space that is accessible to a range of small to medium businesses;

- c) provide affordable workspace in accordance with Policy IE4 (affordable workspace);  
and
- d) explore design options to address safety and access issues on Billy Fury Way (a designated metropolitan walk) including setting back buildings, path widening, improved lighting, creation of active frontages and improving natural surveillance, for example from windows, front doors and balconies over the space.

## ALLOCATION W4 (WHI3) – 13 Blackburn Road

### SITE PLAN



**ADDRESS** 13 Blackburn Road; West Hampstead, NW6 1RZ

**AREA** 0.24 hectares

**ALLOCATED USE** Employment space / Offices and permanent self-contained homes

**INDICATIVE CAPACITY** 24 additional homes (53 total)

**DESCRIPTION OF EXISTING SITE** The site consists of the Clockwork Factory, a part single, part two and three storey former office space (Asher House) that was converted to housing, together with a single storey office building that was not converted. This building fronts onto Blackburn Road and backs onto Billy Fury Way and railway tracks. The site is close to but outside of West Hampstead town centre.

### BACKGROUND

- The site is identified in the Fortune Green and West Hampstead Neighbourhood Plan as a part of the Growth Area and a potential development site. Clear objectives are set out for this site in the adopted West End Lane to Finchley Road Supplementary Planning Document. (2021) and Neighbourhood Plan.
- The Council has resolved to grant planning permission (2020/2940/P) for a mixed use development. If this application is not granted, or the permission is not implemented, the criteria set out below will apply to any future applications on this site.
- It is expected that development will consider adjacent sites' redevelopment plans and take opportunities to work in conjunction with neighbouring sites (particularly 11 Blackburn Road) to help deliver a coordinated approach to development here.

### DEVELOPMENT AND DESIGN PRINCIPLES

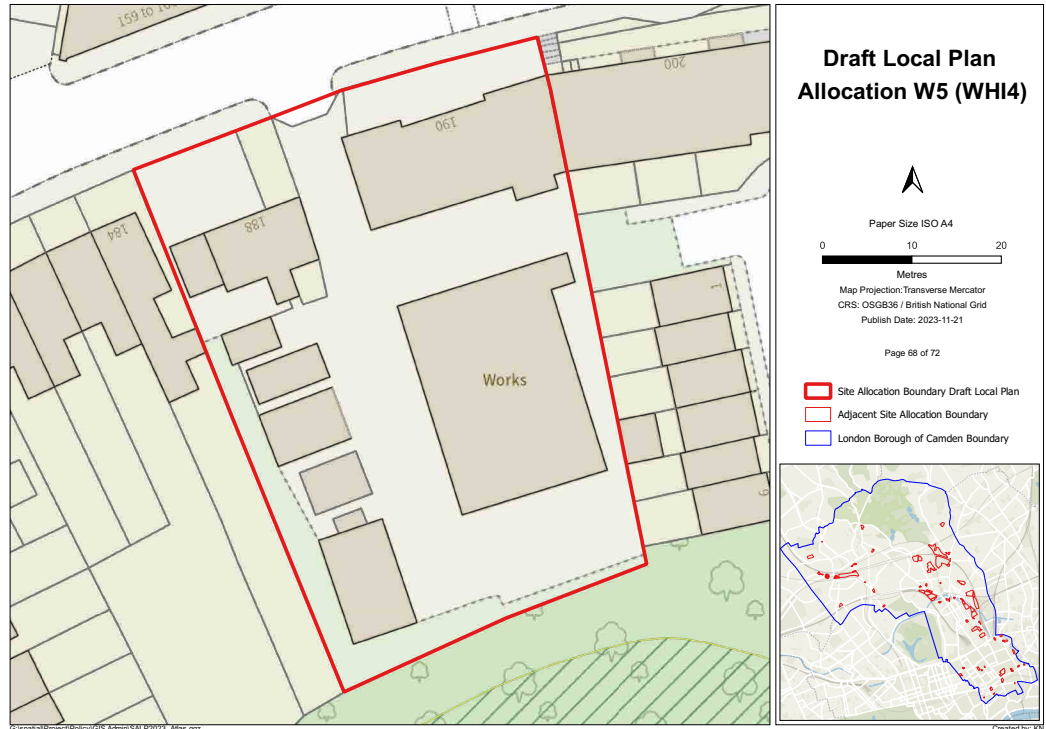
Development must:

- a) not result in any reduction of the amount of existing residential floorspace on site;
- b) seek to include permanent self-contained and affordable homes and a mix of unit sizes, including the provision of larger sized residential units, in accordance with Policy H7 (large and small homes);

- c) ensure that the new employment floorspace is designed to be accessible to a range of small to medium businesses and that affordable workspace is provided in accordance with Policy IE4 (affordable workspace);
- d) seek to include provision of an active frontage to Blackburn Road, to enliven the street, and maximise the pavement widths where possible; and
- e) explore design options to address safety and access issues on Billy Fury Way (a designated metropolitan walk) including setting back buildings, path widening, improved lighting, creation of active frontages and improving natural surveillance, for example from windows, front doors and balconies over the space.

## ALLOCATION W5 (WHI4) – 188 – 190 Iverson Road

### SITE PLAN



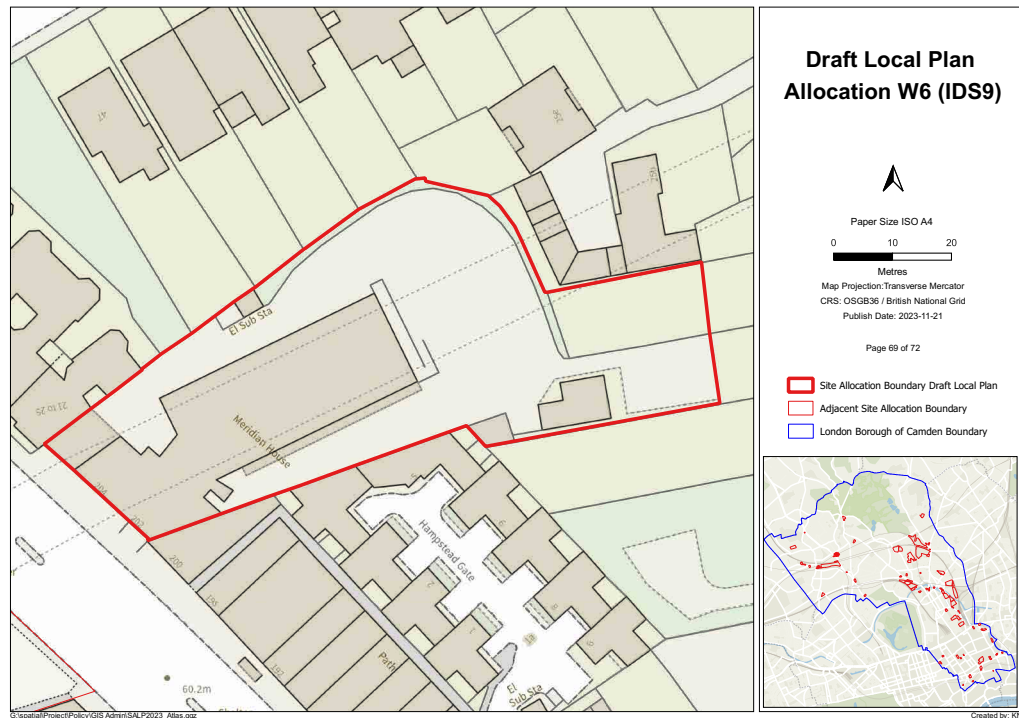
<b>ADDRESS</b>	188- 190 Iverson Road; West Hampstead, NW6 2HL
<b>AREA</b>	0.26 hectares
<b>ALLOCATED USE</b>	Office, light industrial and permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	15 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	This site is occupied by C Tavener and Son, who provide building and joinery services, storage and furniture paint spraying facilities. The uses are contained in a range of single storey buildings across the site, together with a two-storey office building and a single storey office block occupied by Innsifree Housing Association fronting on to Iverson Road. Adjacent to the site are three and four storey residential properties and to the south is a designated open space (designated SINC) and railway lines.
<b>BACKGROUND</b>	
<ul style="list-style-type: none"> <li>The site is in the Fortune Green and West Hampstead Neighbourhood Plan area</li> </ul>	
<b>DEVELOPMENT AND DESIGN PRINCIPLES</b>	
Development must:	
<ol style="list-style-type: none"> <li>ensure there is no net loss of employment floorspace on site, recognising that the development of this site offers the opportunity to consolidate, enhance and intensify the employment floor space provision on site, given the low level nature and number of buildings currently provided;</li> <li>be designed to ensure that the operation of existing, or future, employment uses on the site are not compromised by the introduction of housing;</li> <li>be designed and operated to ensure there is no direct or indirect impact on the designated open space to the south of the site, which is a designated Grade I Site of Importance for Nature Conservation (SINC) and Local Green Space;</li> <li>be designed to ensure that new housing provision is located on the Iverson Road frontage;</li> </ol>	



- e) ensure that continued or future business use is not compromised, particularly commercial vehicular access and movement within the site;
- f) deliver biodiversity enhancements to the border of the site, in accordance with Policy NE2 (Biodiversity); and
- g) seek to retain the mature street trees along the frontage of the site.

## ALLOCATION W6 (IDS9) - Meridian House

### SITE PLAN



<b>ADDRESS</b>	Meridian House, 202- 204 Finchley Road, NW3 6BX
<b>AREA</b>	0.35 hectares
<b>ALLOCATED USE</b>	Light industrial, offices and permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	12 additional homes (20 total)
<b>DESCRIPTION OF EXISTING SITE</b>	Meridian House is a five storey building fronting Finchley Road, in commercial use, with residential uses on the upper floors, and a two storey commercial building stretching into the site. There is a large parking area to the rear of the buildings, together with a former caretakers house adjacent to a copse of trees, protected by a Tree Preservation Order. The site is adjacent to, but not within, the Swiss Cottage / Finchley Road town centre designation or Redington Frogнал Conservation Area. The site is also next to a terrace that is locally listed.

### BACKGROUND

- The site is identified as a potential redevelopment site in the adopted Redington and Frogнал Neighbourhood Plan (2021)
- This site is allocated for the delivery of additional residential units to the rear of the site, on the former caretaker's cottage area, where a previous permission was granted. Comprehensive re-development of the whole site is not envisaged here and would need to be justified in accordance with Policy CC2 (Repurposing, refurbishment and re-use of existing buildings).
- The site is subject to an Article 4 direction that means any change of use of the employment floorspace requires planning approval.

## **DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) ensure the operation of existing or future employment uses on the site are not compromised by the introduction of additional housing;
- b) be designed sensitively to address the level changes both across the site, and in relation to adjacent properties within the Conservation Area;
- c) ensure the protected trees in the wooded copse within the site are protected, sensitively integrated into any redevelopment, and enhanced. There are also protected trees in adjacent sites that will need to be sensitively considered as part of the development of the site;
- d) ensure that if comprehensive redevelopment is considered appropriate, there is no net loss of employment floorspace on the site; and
- e) ensure that where employment floorspace is re-provided, this is designed to be accessible to a range of small to medium businesses and that affordable workspace is provided in accordance with Policy IE4 (affordable workspace).

## **OTHER CONSIDERATIONS**

A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.

## ALLOCATION W7 (IDS10) - Gondar Gardens

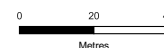
### SITE PLAN



### Draft Local Plan Allocation W7 (IDS10)



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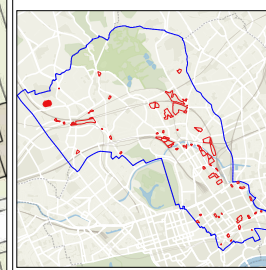


Metres  
Map Projection: Transverse Mercator  
CRS: OSGB36 / British National Grid

Publish Date: 2023-11-21

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- ▭ Site Allocation Boundary Draft Local Plan
- ▭ Adjacent Site Allocation Boundary
- ▭ London Borough of Camden Boundary



**ADDRESS** Gondar Gardens Reservoir, Gondar Gardens, NW6 1QF

**AREA** 1.24 hectares

**ALLOCATED USE** Permanent self-contained homes

**INDICATIVE CAPACITY** 30 additional homes

**DESCRIPTION OF EXISTING SITE** The site forms a long rectangle, bounded on three sides by the rear gardens of terraced houses and with an unbuilt frontage along Gondar Gardens. The site contains a decommissioned reservoir, which comprises a vaulted brickwork structure supported on brick piers and perimeter walls, mostly buried in the ground or contained within a grassed embankment. A significant proportion of the site is designated open space and as a Site of Importance for Nature Conservation (SINC) and is identified in the Fortune Green and West Hampstead Neighbourhood Plan as Local Green Space.

### BACKGROUND

- The Fortune Green and West Hampstead Neighbourhood Plan (2015) outlines some specific visions for this site, including retention of open space, with managed access, maintaining suitable conditions for biodiversity, protecting views across the site and any future development to match the character of existing.
- Since decommissioning there have been several proposals for the development of the site. Although all were refused by the Council, two were allowed at appeal (2011/0396/P and 2013/7585/P). The proposals allowed on appeal therefore establish the principle of, and some parameters for, development on the site.
- However, whilst the (lapsed) previous permissions allowed at appeal are acknowledged, the Inspector's decision dismissing the last appeal (2017/6045/P) concluded that the previous permissions should not be relied on as compelling precedents, particularly for footprint and scale of development.

- A housing led development is considered the most appropriate use for this site and the housing capacity has been informed by the previous applications and appeal decisions (see applications listed above in addition to 2012/0521/P and 2017/6045/P).
- The importance of the perception of open space the site provides and its value for the neighbouring properties, as well as the street, has been acknowledged in previous appeals and is a key part of the Neighbourhood Plan vision for the site which this allocation supports.

#### DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- a) be of an appropriate scale and focused on the un-designated area of the site in order to protect and enhance the designated open space, SINC and Local Green Space;
- b) incorporate ecological mitigation measures to prevent a decline in valuable habitats and protected species on the site. Development must provide a net gain in ecological value in line with Policy NE2 (biodiversity);
- c) be designed to protect views across the site from harm or loss, in particular the view to the east towards Hampstead; and
- d) be designed to establish clearly defined entrances on the Gondar Gardens street frontage to ensure the development actively contributes towards the street scene.

#### OTHER CONSIDERATIONS

A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is over one hectare. Recommendations in the Flood Risk Assessment will be secured by planning condition.

**5.14** The following table identifies further site allocations in the west of the borough, many of which are already subject to planning permission, and sets out key considerations for each site.

Ref*	Address	Allocated use	Indicative capacity	Key Considerations
W8 (WHI5a)	Land at Midland Crescent / Finchley Road	Mixed use including permanent self-contained homes and town centre uses	9 additional homes and 60 student rooms or equivalent residential floor space	Planning permission granted and initial works commenced. If not completed any new development must take into account that the site is within a Flood Risk Area.
W9 (IDS20h)	BP Petrol Station, 104A Finchley Road	Mixed use including commercial and permanent self-contained homes	30 additional homes	Planning application submitted

Ref*	Address	Allocated use	Indicative capacity	Key Considerations
W10 (IDS20q)	Abbey Co-op Housing site, Emminster and Hinstock	Permanent self-contained homes  Class E uses	65 additional homes	Phase 3 planning permission has been granted and demolition occurred (phases 1 and 2 of the Abbey Co-op estate regeneration have been completed)
W11 (IDS20v)	100 Avenue Road	Permanent self-contained homes	184 additional homes	<p>Planning permission granted on appeal and initial works commenced.</p> <p>The Camden Building Heights Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 63m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.</p>
W12 (IDS20z)	Former Liddell Road Industrial Estate	Permanent self-contained homes and  Commercial	106 additional homes	Under construction
W13 (New)	551-557 Finchley Road	Permanent self-contained homes	15 additional homes	Planning permission granted.
W14 (New)	317 Finchley Road	Permanent self-contained homes	22 additional homes	Under construction

\*Previous policy reference used in the draft Site Allocations Local Plan 2020 is shown in brackets

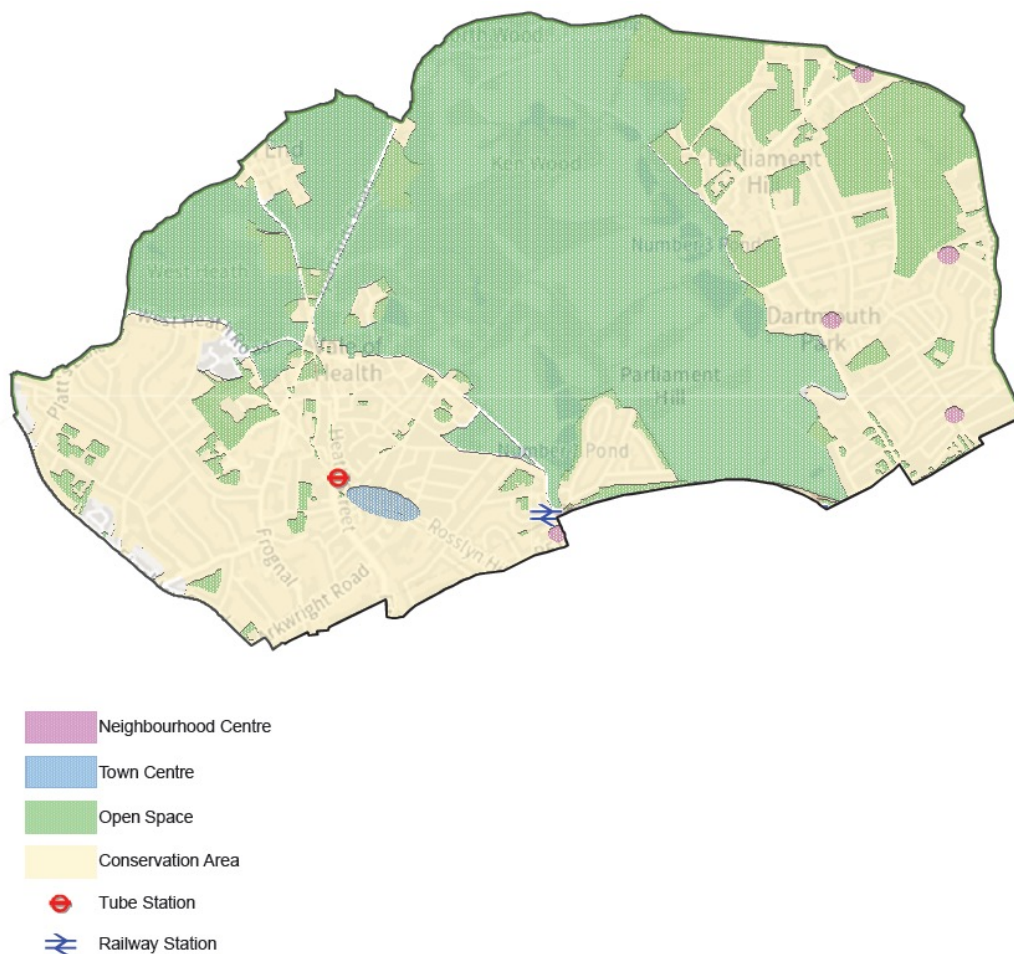
# North Camden



# Chapter 6: North Camden

**6.1** The North of the borough includes the neighbourhoods of Hampstead, Highgate and Fognal and is characterised by its striking topography, rich heritage, distinct character and unique open spaces. The area is predominantly residential in character, with a mix of large and small homes, often with generous gardens, situated on leafy streets. It is also covered, almost entirely, by a number of designated Conservation Areas, containing hundreds of listed buildings of architectural and historic interest.

**Map 8 – North Area**



**6.2** Hampstead is the main town centre in the North of the borough. It provides a high-quality retail and leisure offer, with a range of independent, boutique and niche shops catering both for local residents and visitors. The centre also serves a local economic function, providing secondary office accommodation, generally in small to medium premises. The history of the town, its attractive 'village' environment, conservation area designation and proximity to Hampstead Heath draw a significant number of tourists to visit the town centre; as a result, there is a strong café and restaurant offer in the town, in addition to a cinema primarily serving the local community. There are also a number of neighbourhood centres in the North of the borough providing a more local shopping role.



- 6.3** The North of the borough has the lowest levels of public transport accessibility in Camden and is mainly served by a number of local bus routes, with the main rail and underground services being Hampstead Heath Overground Station and Hampstead Underground Station, with Gospel Oak Overground Station and Tufnell Park Underground Station located nearby.
- 6.4** A key feature of the North Area is Hampstead Heath, the largest open space in the borough, providing nearly half of Camden’s total area of open space and many of our sporting facilities. Hampstead Heath is protected by a number of designations and contains the only Ancient Woodland and Ancient Monument in the borough. The Heath’s elevated position above most of Greater London affords expansive views across the city, with four protected viewing corridors originating in this area. Other notable open spaces in the North of the borough include Highgate Cemetery and Waterlow Park. However, despite the abundance of open space in this area, the areas of Dartmouth Park and Frognal remain comparatively less well served by public open space.
- 6.5** In terms of community provision, the North of the borough is served by two libraries in Highgate and Hampstead (the Keats community library) and several community centres. Hampstead also has a very high concentration of schools where significant issues exist concerning the ‘school run’. Any further applications for schools in this area will be determined in accordance with Policy SC2 (Social and Community Infrastructure).
- 6.6** The North of the borough is covered by four adopted Neighbourhood Plans: the Hampstead Neighbourhood Plan, Highgate Neighbourhood Plan, Redington and Frognal Neighbourhood Plan and the Dartmouth Park Neighbourhood Plan, which set out the community’s aspirations and planning policies for their area. These Neighbourhood Plans are part of the Council’s statutory development plan and are considered, alongside our own policies, when making decisions on planning applications in that area.
- 6.7** Given the established historic character of the area and lack of development sites, opportunities to deliver new homes, jobs and infrastructure in the north of the borough to support Camden’s communities are limited. The policy below sets out the Council’s strategy for the North of the borough to guide the future development of this area.

## **Policy N1 – North Camden**

- A.** Development coming forward in the North of the borough will be expected to preserve and where appropriate enhance the historic character of the area, in addition to delivering benefits to residents to meet the needs of Camden’s communities in accordance with this Local Plan and the Hampstead, Highgate, Redington and Frognal and Dartmouth Park Neighbourhood Plans.

### **New homes**

- B.** Sites have been allocated in the North of the borough to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocations set out below.

- C. Where windfall sites come forward for housing development in this area, these will be determined in accordance with the policies in the Plan.

### **Employment and the Economy**

- D. The Council will manage and protect the stock of offices in the North of the borough. Proposals for small scale office provision will be supported in Hampstead town centre and neighbourhood centres in this area where this is of a commensurate scale for its location, in line with Policy IE2 (Offices).

### **Retail and Town Centres**

- E. The Council will continue to support and protect Hampstead Town Centre and the Neighbourhood Centres in the North of the borough, to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors in line with the policies set out in the Plan, with any additional retail provision to be provided in accordance with Policy IE6 (Supporting town centres and high streets).

### **Infrastructure**

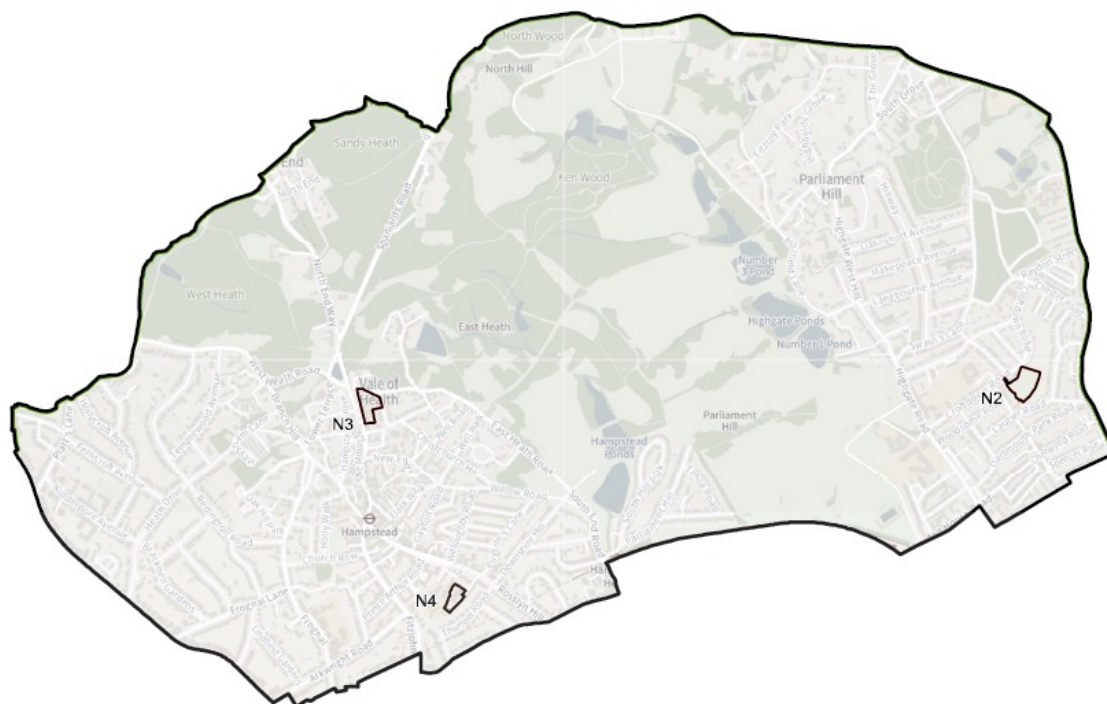
- F. To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure, from appropriate development. The Council will work with relevant providers to secure the infrastructure needed to support development and provide the facilities needed for the area's communities. Key priorities for the North of the borough include:
- i. The roll-out of the Council's neighbourhood-based Safe and Healthy Streets schemes across this area, delivering through-traffic reduction and other Healthy Streets measures;
  - ii. Extensions to the Camden cycle network;
  - iii. The delivery of an Integrated Care Hub;
  - iv. Open space, greening and biodiversity enhancements; and
  - v. The delivery of flood mitigation measures in Hampstead Heath and South End Green.

- 6.8 Information on key infrastructure programmes and projects in the North of the borough are set out in Appendix 1.

## **Site Allocations**

- 6.9 Three site allocations are proposed in the north of the borough, and these are identified on Map 9 and listed in the table below.

## Map 9 – Proposed Site Allocations in the North of the borough



**Table 4 – Proposed Site Allocations in the North of the borough**

Site Reference	Previous Policy Reference*	Site Name
N2	(IDS12)	Mansfield Bowling Club
N3	(IDS20k)	Queen Mary's House
N4	(IDS20l)	Hampstead Delivery Office

\*Previous policy reference used in the draft Site Allocations Local Plan 2020

**6.10** Policies to guide the development of these sites are set out below. Where indicative housing capacities are identified for sites, it is important to note that these are not fixed figures that must be adhered to exactly. A larger number of homes may be supported where it is shown that this 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, and 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.

## ALLOCATION N2 (IDS12) – Mansfield Bowling Club

### SITE PLAN



<b>ADDRESS</b>	Mansfield Bowling Club, Croftdown Road, Highgate, NW5 1EP
<b>AREA</b>	0.85 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	23 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The former Mansfield Bowling Club site is in a residential neighbourhood within the Dartmouth Park Conservation Area. Its former use was as a private bowls club. Part of the site is designated as private open space and tennis courts are also provided on the site. The Dartmouth Park Neighbourhood Plan identifies the site as a 'specific neighbourhood site' and designates part of it as a Local Green Space.

### BACKGROUND

- In January 2017 planning permission (2015/1444/P) was granted on appeal for 21 new dwellings, a new public space, enhanced tennis facilities and an ancillary sports pavilion. This permission was later varied through changes to the layout and mix within the proposed buildings to include two additional dwellings (2018/1701/P). The existing bowling club building has been demolished, although development has not significantly progressed at the time of writing.
- Should the site not be developed for self-contained housing, or the approved scheme not proceed as envisaged, then it may also be appropriate for an alternative residential use such as housing for older or other people with care or support requirements that meets the needs of borough residents, subject to retention of the community benefits secured under the implemented planning permission.

**DEVELOPMENT AND DESIGN PRINCIPLES**

Development must:

- a) make provision for a new public open space; enhanced tennis facilities; and an ancillary sports pavilion on-site. The Council will require new sport/ leisure facilities and public open space to be provided in accordance with Policy SC2 (social and community infrastructure) and Policy SC3 (open space); and
- b) be of a scale that reflects and integrates into the surrounding area and avoids a detrimental impact on the designated open space and Local Green Space.

**INFRASTRUCTURE REQUIREMENTS**

Development must:

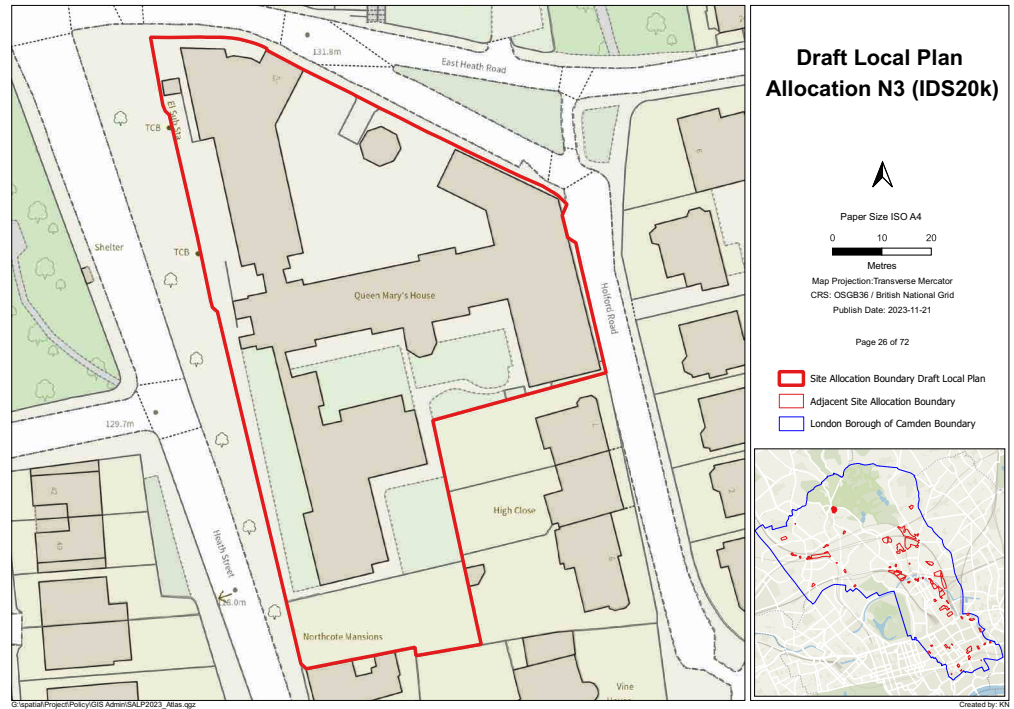
- c) include reconfiguration and extension of the tennis courts to provide an additional court and increased playing area consistent with the previous approved planning applications and Lawn Tennis Association requirements.

**OTHER CONSIDERATIONS**

A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk) as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.

## ALLOCATION N3 (IDS20k) - Queen Mary's House

### SITE PLAN



<b>ADDRESS</b>	Queen Mary's House, 124 Heath Street, Hampstead, NW3 1DU
<b>AREA</b>	0.60 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	80 self-contained homes
<b>DESCRIPTION OF EXISTING SITE</b>	<p>The site is bounded by East Heath Road to the north, Heath Street to the west, residential homes to the south and south east and Horton Road to the east. The site is within the Hampstead Conservation Area and Hampstead Neighbourhood Plan area.</p> <p>Queen Mary's House was built in the 1920s and is considered to be of historical significance. Much of the wall on Heath Street is Grade II listed.</p>

### BACKGROUND

It is understood that the site was in hospital use (former C2 residential institution use class) and key worker accommodation until 2012. It was then used for a variety of administrative functions for various health services and ancillary key worker accommodation (53 single bedrooms, shared bathroom and kitchen facilities and one self-contained unit) in association with the Royal Free Hospital.

### DEVELOPMENT AND DESIGN PRINCIPLES

Development must:

- retain the original Queen Mary's House building as it is of significant historical interest;
- assess the feasibility of retaining all other buildings on the site in line with Local Plan policy on the repurposing, refurbishment and re-use of existing buildings (Policy CC2);

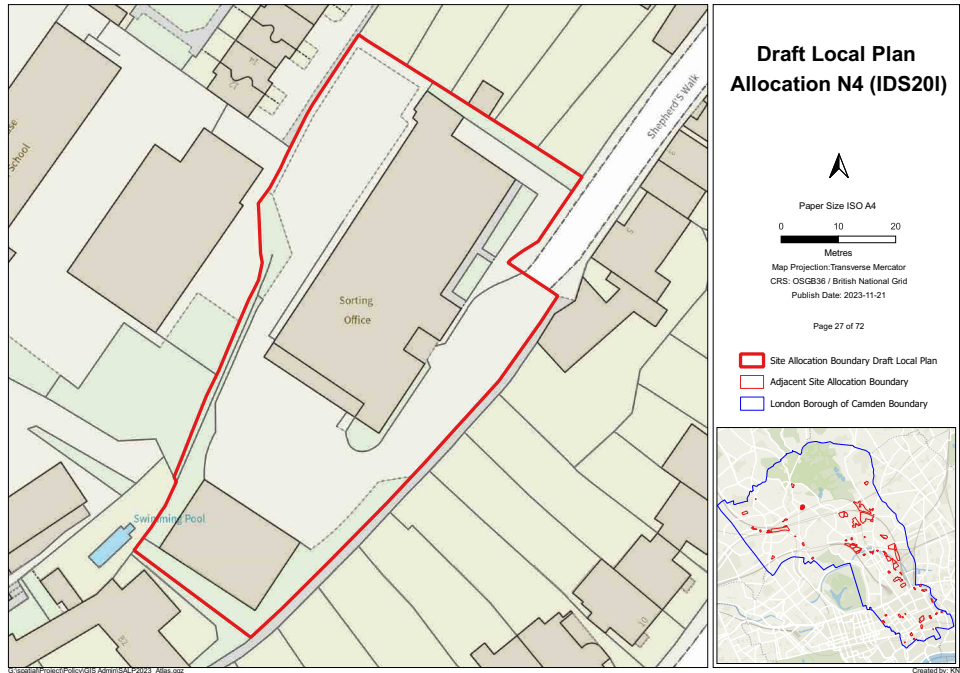
- c) retain, or reprovide, at least an equivalent amount of affordable housing floorspace to the existing;
- d) preserve the landscape character of the site. Applications should be accompanied by a detailed arboriculture assessment;
- e) be designed to be of a scale that fits into the prevailing low scale character of the area; and
- f) ensure that the listed wall is retained.

#### **OTHER CONSIDERATIONS**

- A Flood Risk Assessment will be required in accordance with Policy CC11 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or detailed drainage strategy may be required

## ALLOCATION N4 (IDS20I) - Hampstead Delivery Office

### SITE PLAN



<b>ADDRESS</b>	Hampstead Delivery Office; Shepherds Walk, NW3 5UF
<b>AREA</b>	0.35 hectares
<b>ALLOCATED USE</b>	Permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	45 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site is located at the south-western end of Shepherd's Walk and comprises of a primarily two-storey 1950s building with a service yard for delivery vehicles and a parking area. Spring Walk continues along the south of the site as a pedestrian walkway connecting to Fitzjohns Avenue. The site currently operates as a Royal Mail Delivery Office. The surrounding uses are all residential.

### BACKGROUND

- The site is within the Fitzjohns/Netherhall conservation area and the Hampstead Neighbourhood Plan area.
- This allocation sets out the Councils preferred approach to the delivery of this site should it become surplus to Royal Mail requirements as a postal delivery office.

### DEVELOPMENT AND DESIGN PRINCIPLES

- Development must:
- ensure that the scale and design of any redevelopment responds and contributes to the prevailing character of the area, surrounding buildings and designated Conservation Area; and
  - be successfully integrated into the surrounding area and not be detrimental to the pedestrian walkway to the south of the site.



# Meeting Housing Needs



# Chapter 7: Meeting housing needs

- 7.1** The Council recognises that housing is vitally important to nearly every aspect of people's lives and that everyone deserves a safe and affordable place they call home. However, housing in Camden is some of the most expensive to rent and buy in the UK, and there are not enough truly affordable homes for everyone. The shortage of decent and affordable housing of all types and tenure is leading to people moving out of Camden – and many people who have grown up in the borough cannot afford to stay, especially when they start a family.
- 7.2** These issues also mean that some people and families are living in overcrowded and poor quality housing, which has a detrimental impact on mental and physical health, wellbeing, education and more. A disproportionate number of Camden families living in these conditions are from Black, Asian, or other ethnic communities.
- 7.3** We also know how important it is to ensure that all older people, disabled people, and other people with care or support requirements have accessible and appropriate housing that meets their needs, to promote health and well-being and a good quality of life.
- 7.4** To tackle these issues, we need to ensure that there is a sufficient supply of new homes in the borough to meet the needs of Camden's diverse communities, both now and in the future.
- 7.5** The Local Plan aims to deliver 11,550 additional homes (770 homes per year) in Camden over the period to 2041. This target is calculated based on the guidance in the London Plan, and further information on it and how new homes will be delivered in Camden are set out in Chapter 2 - Development Strategy.
- 7.6** Policy H1 sets out how the Council will seek to maximise housing supply in Camden over the Plan period, with subsequent policies providing guidance on the delivery of affordable housing and the mix of sizes and types of homes that are needed to meet the needs of particular groups of people.

## Policy H1 – Maximising Housing Supply

- A.** The Council will aim to deliver 11,550 additional homes over the Plan period to 2041.
- B.** The Council will seek to secure a sufficient supply of homes to meet the needs of existing and future households in Camden to meet the above housing target by:
- i.** regarding permanent self-contained housing as the priority land-use of the Local Plan;
  - ii.** working to return vacant homes to use and ensure that new homes are occupied;
  - iii.** resisting the alternative development of sites identified for housing, or permanent self-contained housing, through a current planning permission or a development plan document, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing;

- iv. resisting the development of housing for short term lets, unless it can be demonstrated to the Council's satisfaction that the site is unsuitable for the provision of permanent self-contained housing;
- v. optimising the homes delivered on all sites using a design-led approach, and benchmarking against nationally described housing standards to make the maximum reasonable provision for housing that is compatible with any other uses needed on the site; and
- vi. resisting very large homes, by benchmarking floorspace against nationally described housing standards.

C. We will monitor the delivery of additional housing against the housing target and seek to maintain supply at the rate necessary to meet the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or capital value of different house types and tenures, and the needs of different groups.

- 7.7 Housing development coming forward in Camden will be expected to be in conformity with the housing policies in this Plan and proposals should also be designed having regard to:
- other relevant policies throughout the Local Plan, particularly those on Design and Amenity, Heritage, Climate Change and Transport;
  - Camden Planning Guidance, particularly documents on Design, Housing, Sustainability, Amenity, and Transport;
  - The London Plan and Supplementary Planning Guidance (SPGs) issued by the Mayor of London;
  - Building for Life - the industry and government endorsed standard for well designed homes and neighbourhoods; and
  - WELL Building Standard – the global rating system focussed on the ways that buildings, and everything in them, can improve comfort, drive better choices, and enhance health and wellness.

### **The priority for permanent self-contained homes**

7.8 Self-contained houses and flats are defined as homes where all the rooms, including the kitchen, bathroom and toilet, are behind a door that only one household can use (2021 Census Glossary of Terms). The term "permanent" is used to indicate that short-term visitor accommodation (accommodation available to let for periods of less than 90 days) is not a suitable alternative use of a site identified for self-contained homes or housing.

7.9 In most cases permanent self-contained homes fall in Use Class C3, however the Council will also regard the following as self-contained homes when applying Local Plan policies and monitoring housing delivery:

- self-contained homes provided in conjunction with another use, notably live/work units (homes with a dedicated work area), which are usually considered to be sui generis (in a class of their own); and
- small houses in multiple occupation (Use Class C4), which can change to Use Class C3 without a planning application under the freedom provided in legislation. Where the freedom to change to Use Class C3 has been removed (e.g. by a planning condition), the Council will regard small houses in multiple occupation as non-self-contained housing.

- 7.10** Self-contained homes have the greatest potential to provide for a variety of household types with a reasonable standard of privacy and amenity. They generally have the space and flexibility to provide for people whether they are young or old, single people (often sharing), couples or families, and disabled people, or people who need a carer for certain activities or overnight. Non self-contained housing with shared facilities is generally aimed at a particular group, or household type (e.g. students or single people). This accommodation can be the best way of tailoring facilities, or support, to suit the characteristics of a particular group, but provides less flexibility for alternative occupiers and can create a greater risk of conflict between people with different cultures and lifestyles.
- 7.11** The majority of Camden's residents live in self-contained homes, as part of a household, or as single person households. This includes people living in multi-adult households, such as groups of friends and flat shares. In many cases these residents are not related to the other occupiers of their home, so although they currently live in self-contained homes, they could potentially live in non self-contained housing in the future.
- 7.12** Given the affordability issues that exist in Camden, maximising the supply of self-contained housing is a key priority for the Council, as the delivery of additional self-contained housing directly triggers the application of Local Plan Policy H4, which expects a contribution to the provision of affordable housing. Evidence shows that the need for affordable housing in Camden far outstrips supply. Given the scale of affordable housing need in the borough, the Council aims to maximise the supply of affordable housing from each development site, having regard to the London Plan's 50% strategic target, and this Plan's strategic target for 3,000 additional affordable homes set out in Policy H4. As a result there is a need to prioritise the delivery of permanent self-contained housing in the borough to help meet our affordable housing target and achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.

### **Ensuring homes are occupied**

- 7.13** In 2022 almost 1,355 homes in Camden had been vacant for 6-months or more. Whilst an element of vacancy in the housing stock is inevitable, given the demand for housing in Camden, returning vacant homes to use is a high priority.
- 7.14** Given this, the Council will use a variety of means to bring empty homes back into use, including:
- Issuing Council Tax penalties – where a home has been empty for 2 years and over, this attracts a 100% premium, doubling the council tax payable. If the property remains empty for 5 years or more a 200% premium will be payable, tripling the council tax payable. Homes kept empty for over 10 years or more will attract a 300% premium, which quadruples council tax payable.
  - Taking enforcement action where works to a property are required;
  - Issuing an empty dwelling management order under the Housing Act 2004; and
  - Using compulsory purchase orders to acquire land and buildings.
- 7.15** In addition to this, the Council will also explore further ways to ensure that investment homes are made available for occupation, for example by encouraging

new owners to use our local lettings agency Camden Lettings. Furthermore, the Council will seek to apply Local Plan policies flexibly where this is appropriate to enable refurbishment of a property that would otherwise remain vacant.

### **Resisting alternative development of identified housing sites**

- 7.16** Where possible, we have identified underused sites that are suitable for additional self-contained housing or another form of housing and allocated them in this Plan, and we will resist an alternative use of these allocated sites. However, a high proportion of the housing developments that come forward in Camden are not identified in advance because they are small sites or were in use when sites were assessed for allocation. Given this, the Council may also resist the alternative development of other non-allocated sites that have an existing consent for self-contained housing or another form of housing (an existing consent is one that has not expired or remains in effect because development has been started).
- 7.17** If alternative development is proposed on a site identified for self-contained housing, we will consider whether there is a reasonable prospect of a viable development for self-contained housing coming forward within the Plan period. We will also consider any other relevant material considerations, such as whether the alternative development will free up a replacement site in the borough for self-contained housing or provide an essential community facility or infrastructure that cannot be accommodated elsewhere.
- 7.18** The Council will generally treat live / work units in the same way as housing for the operation of development policies. Such premises contribute to the range of homes and business premises in the borough, and the Council will not resist the development of live - work premises on sites that are considered suitable for housing provided that they include an appropriate mix of dwelling sizes and types in accordance with other policies including H4 and H7.
- 7.19** The Council will also resist the development of sites for permanent short term let housing, unless it can be evidenced to the Council's satisfaction, that the site is unsuitable for the provision of permanent self-contained housing.

### **Optimising sites to deliver housing**

- 7.20** To maximise delivery of homes to meet Camden's needs we must ensure that each site that comes forward is optimised in its potential for housing using a design-led approach. This would make the best use of our sites and deliver more homes without compromising on quality. Further guidance on this is set out in the Mayor's London Planning Guidance (LPG) on Optimising site capacity: A design led approach.
- 7.21** Where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for housing unless:
- the Plan seeks to protect existing uses on site, such as business premises, community uses and shops;
  - the site is needed to meet other plan priorities for the area, particularly in the Hatton Garden area and other parts of the Central Activities Zone;

- the site is identified for another use in a development plan document; or
- it is demonstrated to the satisfaction of the Council that a housing development would not be financially viable.

**7.22** Where non-residential uses are required on the site, the Council will seek mixed-use schemes including the maximum appropriate provision of housing. More details of our approach to the inclusion of housing in mixed-use developments are set out in Policy H2 Maximising the supply of self-contained housing from mixed-use schemes.

**7.23** The nationally described minimum space standards as adopted in the London Plan must be used as a benchmark for the size of homes. This will ensure that sites are optimised and meet space standards but do not go above the standards so significantly as to create very large homes. The provision of 'super-prime' large homes has an impact on the ability of the borough to meet its housing supply targets as the sites for these developments are often capable of accommodating a much larger number of smaller homes. Very large homes are also linked to the issue of 'buy to leave' housing, which are bought for investment rather than living and are not consistent with objectives of this Plan.

### **Flexible implementation**

**7.24** Given current and future uncertainties, there is a need to monitor the supply of housing closely and make adjustments to the way we implement our Local Plan policies to ensure that our targets for additional homes are met. If overall housing supply appears to be threatened by economic conditions, there are a number of areas of flexibility in the Council's policy approach that will enable us to tailor our objectives to the particular circumstances of each proposal with a view to maximising delivery. These include:

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

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

**7.26** In seeking to secure the future supply of additional housing, we will work in partnership with many other organisations and agencies involved in the development and funding of housing and affordable housing. These will include our developers, landowners and private landlords, Housing Associations and other affordable housing providers, the Mayor and the GLA and other local authorities –

particularly councils in Central and North London, government departments and government agencies.

## Maximising the supply of self-contained housing from mixed-use schemes

- 7.27** Policy H2 applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase. Policy H2 also applies to all non-residential uses, including hotels and other visitor accommodation and non-residential institutions. However, a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought.
- 7.28** Policy H2 specifically seeks provision of self-contained houses and flats (Use Class C3), rather than other forms of housing, in line with the priority land-use of the Plan as set out in Policy H1 - Maximising housing supply.

### Policy H2 - Maximising the supply of self-contained housing from mixed-use scheme

- A.** Where non-residential development is proposed in any part of the borough, the Council will support the aims of Policy H1 by promoting the inclusion of permanent self-contained homes as part of a mix of uses.
- B.** In the defined South Camden sub-area and the town centres of Camden Town and Finchley Road/ Swiss Cottage, we will expect a contribution to permanent self-contained housing from all developments that provide additional non-residential floorspace and involve additional floorspace of 200sqm (GIA) or more. The Council will seek to negotiate the contribution to permanent self-contained housing on the following basis:
- i.** a self-contained housing target of 50% is applied to all additional floorspace proposed (GIA);
  - ii.** the target is not applied to development in the defined Hatton Garden area provided that an equivalent contribution to jewellery workspace is provided in place of self-contained housing;
  - iii.** the target is not applied to development (or parts of development) which are publicly funded or otherwise serve a public purpose provided that the public purpose is secured for a reasonable period;
  - iv.** the target is applied to additional floorspace proposed, not to existing floorspace or replacement floorspace;
  - v.** the target is sub-divided to provide an affordable housing target and a market housing target on the basis of Policy H4;
  - vi.** for developments involving an additional floorspace of at least 200sqm (GIA) but less than 1,000 sqm (GIA), we will seek on-site delivery of self-contained housing, but will have regard to the criteria in Parts B and C of this policy, and provide flexibility for off-site delivery where on-site delivery would demonstrably and unavoidably result in housing or non-residential floorspace of unsatisfactory quality;

- vii. for developments involving an additional floorspace of 1,000sqm (GIA) or more, self-contained housing should be provided on site, subject to the criteria in Parts B and C;
- viii. for developments involving an additional floorspace of 2,000sqm (GIA) or more, affordable housing should be provided on site, subject to the provisions of Policy H4;
- ix. where the self-contained housing target cannot be met in full, we will prioritise the on-site delivery of affordable housing;
- x. where self-contained housing cannot practically be provided on site, or off site provision would create a better contribution (in terms of quantity, quality and/ or affordability), the Council may accept provision of self-contained housing off site in the same area, or exceptionally a payment-in-lieu.

- C. In considering whether the self-contained housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:
- i. the character and size of the development, and any constraints on developing the site for a mix of non-residential uses and self-contained housing, including constraints arising from operational requirements of the proposed non-residential use and other nearby uses;
  - ii. the impact of a mix of uses on the efficiency and overall quantum of development;
  - iii. the extent of any additional floorspace needed for an existing user;
  - iv. any floorspace needed for particular Central Activities Zone (CAZ) activities, having regard to CAZ strategic functions and specialist clusters recognised by the London Plan, and designations in this Plan;
  - v. whether active street frontages, natural surveillance and community safety (within and outside normal business hours) can best be promoted through the provision of self-contained housing, retail or other uses;
  - vi. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as visitor accommodation; and
  - vii. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

- D. In the areas specified by this policy, where provision of self-contained housing falls significantly short of the Council's 50% target due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek a late stage viability review to determine the deliverability of an additional financial contribution towards the self-contained housing shortfall.

- 7.29 Policy H1 indicates that where sites are underused or vacant, we will expect the maximum reasonable provision of housing that is compatible with any other uses needed on the site. Where it is not appropriate to develop a site entirely for housing, securing housing as part of a mixed-use scheme is another way of meeting some of our housing needs whilst also meeting other needs in the area, such as providing jobs, services and facilities. Developing a mix of uses on individual sites and across an area can also be beneficial in other ways, such as:
- increasing community safety and security by providing a range of activities that attract people at different times during the day and evening;
  - contributing to the creation of areas that are diverse, distinctive and attractive;



- reducing the need to travel between homes, jobs and services;
- overcoming the loss of customers for shops and services arising from increased home-working and less consistent occupation of workplaces; and
- allowing an efficient use of land, with housing developed above those uses which benefit from direct ground floor access or a street-level frontage, such as shops.

**7.30** Much of the borough already has a well-established mixed-use character. To support this mixed-use character and the aims of Policy H1, the Council will encourage non-residential development throughout the borough to provide a mix of uses including self-contained housing.

**7.31** Where Policy H2 applies to development, the Council will generally seek permanent self-contained housing (in Use Class C3). This is consistent with the specification of permanent self-contained housing as the priority land-use of the Local Plan in Policy H1. The term “permanent” is used to indicate that short-term visitor accommodation (accommodation available to let for periods of less than 90 days) is not accepted as a contribution to self-contained housing as it will not contribute to meeting the borough’s housing needs.

**7.32** To ensure that housing provided as part of a mixed use scheme contributes to meeting the targets identified in Policy H1, rather than being used as ancillary space by non-residential occupiers, the homes should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.

**7.33** The Council has established detailed requirements for non-residential development in the South Camden sub-area and the town centres of Camden Town and Finchley Road/ Swiss Cottage as these are the parts of the borough which have the most intense pressure for non-residential uses, the best potential for a mix of uses, the best prospect for the development of housing above active street frontages, and the best access to public transport. Additional housing in these locations will help provide activity and surveillance when businesses are closed, and support shops, services and local facilities. Therefore, the Council will require development schemes in the South Camden sub-area and these two larger town centres to provide a mix of uses subject to the considerations set out in Policy H2, and will seek half of all additional floorspace as self-contained housing (in Use Class C3), such that additional floorspace in residential use matches all the additional floorspace in non-residential uses.

**7.34** In these locations, Policy H2 provides criteria used to determine whether a contribution to self-contained housing is sought, the type of housing sought, whether the housing should be provided on site or off site, and achieving an appropriate mix of housing and other uses. The following paragraphs explain these in turn. Further details of the operation of Policy H2 are also set out in the Council’s supplementary planning document Camden Planning Guidance on Housing.

### **Proposals where we will seek a contribution to housing**

**7.35** Proposals for additional non-residential floorspace in the South Camden sub-area of the borough and specified town centres will be expected to contribute to self-

contained housing in accordance with the provisions of criteria (i) to (x) in Part B of Policy H2. The Council has applied a target of 50% for the proportion of self-contained housing since in 2004, and has used this successfully as the starting point for negotiations. The target is applied flexibly, having regard to the full set of criteria in Part B and Part C.

- 7.36** No contribution is sought from developments involving additional floorspace of 200sqm (GIA or gross internal area) or less. This threshold is based on the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development.
- 7.37** In the designated Hatton Garden area, the Council's priority is to secure and protect a stock of premises for the jewellery sector and support the nationally important cluster of jewellery manufacture and trading that gives the area its special character. Consequently, in accordance with Local Plan Policy S2, in the Hatton Garden area we will seek a contribution to affordable jewellery workspace rather than a contribution to housing.
- 7.38** We will not seek a contribution from those elements of a development that are publicly funded or otherwise serve a public purpose, such as hospitals, educational, medical and research institutions, and transport infrastructure and facilities. We recognise that the nature of public funding may preclude development to serve other purposes, the sites available to the public purse are often too constrained to provide space for other uses, and the nature of some public services will not be compatible with housing (e.g. 24 hour activity and movements serving a hospital).
- 7.39** Policies elsewhere in the Local Plan (such as the Inclusive Economy chapter) seek to protect a number of existing non-residential uses, such as offices, industry and warehousing. In addition, the London Plan prioritises offices and other strategic functions in the Central Activities Zone. To ensure that valued non-residential uses are not compromised, we will only seek a contribution to housing from net additions to floorspace, and not to existing floorspace that is retained, refurbished or replaced.

### **Whether the housing contribution should be made on-site**

- 7.40** We recognise that where the additional floorspace proposed is less than 1,000 sqm GIA, given the need to accommodate separate access lobbies, stairs and lifts, maintain existing ground floor activity, provide an efficient layout, and provide a satisfactory standard of residential amenity, it may be difficult to accommodate a contribution to housing on-site. Consequently, for schemes of this scale, we will provide flexibility for off-site contributions where on-site provision would demonstrably compromise the quality of the space. However, we will expect larger schemes to provide on-site contributions to self-contained housing. In all cases, we will have regard to the full set of criteria in Parts B and C of this policy.

### **Relationship with affordable housing requirements**

- 7.41** Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought subject to the provisions of Policy H4 - Maximising the supply of affordable housing. Based on the additional floorspace proposed, the 50% target for self-contained housing, and the provisions of Policy

H4, the self-contained housing target will be sub-divided into an affordable housing target and a market housing target. This will enable us to operate a priority for delivery of affordable housing, as explained in the following paragraphs.

**7.42** Policy H4 anticipates that affordable housing will be provided as a payment-in-lieu for developments with capacity for fewer than 10 additional dwellings, while larger schemes will provide affordable housing on-site. Under the provisions of Policy H4, developments with capacity for 10 additional homes will generally be those involving a residential floorspace of 1,000 sqm GIA or more. Considering this in tandem with the Policy H2 target for 50% of additional floorspace to take the form of self-contained housing, where the total additional floorspace proposed is 2,000 sqm (GIA) or more, we will expect on-site provision of affordable housing.

**7.43** The 2017 London Strategic Housing Market Assessment indicated that 47% of the housing need in London would be for low-cost rented housing and a further 18% would be for intermediate housing. Similarly, the Camden Housing Needs Update for 2021 - 2039 indicates that 49% of housing need in Camden will be for low-cost rented housing, and a further 27% will be for intermediate housing. Over the years 2016 - 2021, only 923 additional affordable homes were delivered in Camden, which was only 27% of the five-year need based on the Camden Strategic Housing Market Assessment 2016. Consequently, where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the Council will prioritise on-site delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4.

### **Off-site contributions**

**7.44** There may be circumstances (even when the additional floorspace is 1,000sqm or more) where housing cannot practically be achieved on-site or would more appropriately be provided off-site (for example where the entire additional floorspace is needed for an existing user). Relevant considerations are set out in Part C of this policy. Where the Council considers that off-site provision is appropriate this will be secured through a planning obligation. There is intense competition for development sites in Camden, which creates a risk that no site will become available for delivery of the housing if it cannot be identified by the time the non-residential application is determined. Consequently, the Council will normally expect the planning obligation to specify the anticipated delivery site (or sites).

**7.45** For off-site provision, we will assess how much housing is required by looking at all sites involved in the arrangement. We will apply the 50% target to the additional floorspace added at all sites involved, taking into account the full addition to non-residential floorspace proposed at the application site, any gain or loss of non-residential floorspace arising at the site or sites where the housing will be delivered and the need to replace any existing housing lost as part of each development. Where the housing is delivered off-site, this will enable additional non-residential space to be provided at the application site, and increase the overall scale of development, so the Council will expect to achieve a significantly enhanced housing contribution off-site (in terms of quantity, quality and/ or affordability), having regard to the net additional non-residential floorspace across all sites.

- 7.46** The Council will seek any off-site provision of housing on an alternative site nearby. All alternative sites must be in the borough. Where the development is in the South Camden sub-area, an alternative site will initially be sought in the same sub-area and within an 800 metre straight-line distance of the development (broadly equivalent to a ten-minute walk). Where no appropriate South Camden sites are available within an 800 metre distance, the Council will subsequently seek the nearest appropriate site anywhere within the South Camden sub-area. Where the development is in the town centres of Camden Town and Finchley Road/ Swiss Cottage, an alternative site will initially be sought within an 800 metre straight-line distance of the development, excluding any sites within South Camden. If no appropriate sites are available within an 800 metre distance of the development (and outside the South Camden sub-area), the Council will subsequently seek the nearest appropriate site anywhere outside the South Camden sub-area. As part of the consideration of off-site options we will explore with developers whether the housing could be delivered on Council-owned land.
- 7.47** Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation.
- 7.48** More detailed information regarding the calculation of off-site provision and payments in lieu is provided in our supplementary planning documents Camden Planning Guidance on housing and Camden Planning Guidance on planning obligations.

### **Self-contained housing, student housing and Higher Education institutions**

- 7.49** Where Policy H2 applies to development, the Council will generally seek self-contained housing (in Use Class C3). This is consistent with the specification of self-contained housing as the priority land-use of the Local Plan in Policy H1. To ensure that housing provided as part of a mixed use scheme contributes to meeting the targets identified in Policy H1, rather than being used as ancillary space by non-residential occupiers, the homes should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.
- 7.50** In accordance with criterion (iii), we will not seek a housing contribution from development of non-residential floorspace secured for occupation by a Higher Education institution which is supported by the Office for Students, and thereby serves a public purpose. In addition, where development is proposed by a Higher Education institution supported by the Office for Students, as an alternative to seeking self-contained housing, the Council may support a mixed-use development including student housing that serves the same institution, subject to the student housing satisfying the requirements of Policy H9.
- 7.51** Student housing proposed in accordance with Policy H9 is considered to be residential floorspace and therefore the requirements of Policy H2 do not apply. The Council will not seek the inclusion of self-contained housing in such proposals except in relation to the application of Part D of Policy H4 (which encourages contributions to affordable housing) and Part B of Policy H1 (which resists alternative development of sites identified for self-contained housing).

## Achieving an appropriate mix of housing and other uses

- 7.52** Where self-contained housing is sought as part of a mix of uses, all criteria in Policy H2 will be used to help us consider the appropriate mix of housing and other uses for a site, and whether the housing should be provided on the site or elsewhere. Further detail of how these criteria will be applied are set out in the Council's supplementary planning document Camden Planning Guidance on housing (including the assessment of financial viability). A number of considerations relating to Part C of Policy H2 are set out below.
- 7.53** The character and size of the development may influence the mix of uses that is most appropriate. For example, elements of a development that adjoin existing buildings and/ or are adjacent to a narrow street may be unable to provide satisfactory daylight and sunlight for housing, while those involving cultural uses, such as performance spaces, may be unable to accommodate housing in the same building due to levels of noise and vibration. Developments may also be constrained by the need to incorporate an existing building (especially a listed building or a building that makes a positive contribution to a conservation area) which is unable to accommodate particular new features necessary to support housing or non-residential uses, such as additional doors and window openings to serve housing, or generous floor to ceiling heights with contemporary mechanical and electrical services to meet the needs of commercial uses.
- 7.54** The appropriate mix will also be influenced by the impacts of multiple entrances, staircases and lifts, particularly where a limited street frontage is available, or where both market and affordable housing are sought. We will take account of the impacts on the overall usable area, the layout of the different uses, and how these factors affect viability. We will also consider the space needs of existing users and seek to ensure that they can expand without relocating.
- 7.55** In some areas, there may be local priorities to be balanced against the priority given to housing, particularly in the Central Activities Zone (CAZ). The town centres and the CAZ provide frontages that are key to the area's retail and service function, and these should not be compromised by the introduction of alternative uses or extensive entrance lobbies. The CAZ also supports some uses that have a national or international function and make major contributions to Camden's economy, and their needs will be given significant weight. The Council supports the institutions and activities that comprise the Knowledge Quarter in the general area of King's Cross and Euston, such as the Wellcome Institute and the British Library, and their requirements may be foremost in particular locations.
- 7.56** Residential and non-residential uses can both add to community safety by increasing the diversity and vitality of streets and providing natural surveillance. When considering these factors, we will consider all publicly accessible spaces within and surrounding a development, the interface between the development and public spaces at street level and above, and the levels of activity and surveillance inside and outside normal business hours.
- 7.57** The Council will positively consider alternative approaches that can better deliver a supply of land for self-contained housing, for example making a site available

for housing development by another organisation such as the Council or a Housing Association. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver a mixed-use scheme containing housing e.g. the impact of providing a new station entrance to promote use of public transport.

- 7.58** In negotiating the appropriate mix of uses, the Council will consider all aspects of financial viability including particular costs associated with the development and the distinctive viability characteristics of particular development sectors (such as visitor accommodation). We will generally expect submission of a financial viability appraisal to justify the mix proposed, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. The Council will also expect developers to fund an independent verification of the appraisal.
- 7.59** Where a contribution to self-contained housing is sought by Policy H2 but financial viability constraints prevent a development from meeting the 50% target and there is a prospect of viability improving prior to completion, the Council will expect a late stage viability review to take place when costs and receipts are known as far as possible. In circumstances where a requirement for on-site affordable housing applies, and the scheme must be referred to the GLA under the Town and Country Planning (Mayor of London) Order 2008 (as amended), we may also seek an early stage viability review in accordance with Local Plan Policy H4 and the London Plan viability thresholds.
- 7.60** Where an early stage viability review shows that viability has improved since permission was granted, we will seek additional affordable housing on-site in accordance with the London Plan. Where a late stage viability review shows that viability has improved, we will seek a further financial contribution to self-contained housing, not exceeding the payment-in-lieu that would arise from the shortfall between the initial contribution and the 50% target, and having regard to any other priority uses introduced as an alternative to self-contained housing. Our supplementary planning document Camden Planning Guidance on housing provides more detailed guidance on viability review mechanisms.

## Protecting existing homes

- 7.61** Policy H3 seeks to protect all residential floorspace where people live long-term. It also seeks to protect individual self-contained houses and flats (in Use Class C3) and individual houses and flats shared by 3 to 6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, Use Class C4).
- 7.62** Other policies in this section of the Local Plan also provide more specific provisions protecting particular types of housing, as follows:
- affordable housing floorspace is protected by Policy H5;
  - housing for older people, homeless people and other people with care or support requirements is protected by Policy H8;
  - student housing is protected by Policy H9; and

- other housing where occupiers do not live as a family but are long-term residents sharing some rooms and/ or facilities (such as bedsits) is protected by Policy H10.

## Policy H3 - Protecting existing homes

- A.** The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by resisting the net loss of all residential floorspace, resisting the permanent conversion of residential floorspace to short-stay accommodation, and resisting conversion of existing housing which would involve the net loss of homes.
- B.** The Council will resist development that would involve a net loss of residential floorspace, including any residential floorspace that is provided:
- within hostels or other housing with shared facilities; or
  - as an ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use.
- C.** The Council will resist the permanent conversion of residential floorspace to short-stay accommodation intended for occupation for periods of less than 90 days.
- D.** The Council will resist development involving conversion of existing housing that would result in the net loss of homes, unless the development:
- creates one larger home through the net loss of one home (taking into account extant permissions and cumulative change since June 2006);
  - creates large homes in a ward with a relatively low proportion of large dwellings, currently Bloomsbury, Holborn and Covent Garden, Kilburn and King's Cross;
  - adapts existing affordable homes for low-cost rent to provide the affordable dwelling-sizes that are most needed; or
  - enlarges homes to meet the nationally described space standard where they are currently 20% or more below it and the loss of homes is the minimum necessary to meet the relevant standard.

### Loss of residential floorspace

**7.63** As indicated in the paragraphs accompanying Policy H1, meeting housing needs in Camden and across London will be challenging. To tackle Camden's housing needs, the Council aims to maximise the supply of additional homes and regards self-contained housing as the priority land-use of the Local Plan. In tandem with these objectives the Council also aims to protect all types of existing housing against development that would involve a net loss of residential floorspace.

**7.64** The types of housing we aim to protect include:

- residential floorspace that is ancillary to another use (e.g. staff accommodation above a shop or pub) where the proposed change involves development and is subject to planning control; and
- floorspace at nursing homes, care homes or hospitals where people live long-term, such as accommodation for nurses and for patients who are no

longer able to live independently (including resident lounges, sleeping areas, bathrooms/ toilets, and associated circulation space).

- 7.65** Small losses of residential floorspace may be acceptable where they will enable delivery of other Local Plan priorities, but we will resist any reductions in floorspace that are material because they reduce the number of residents who can occupy a home or property.

### **Short-stay accommodation**

- 7.66** In London, the Greater London Council (General Powers) Act 1973 (as amended by the Deregulation Act 2015) provides for Council Tax payers to let their property as visitor accommodation for short periods not exceeding a total of 90 days in any one calendar year; however, a permanent change to visitor accommodation is defined as development. Letting housing to visitors reduces the accommodation available to permanent residents. Consequently we will resist proposals that would involve a permanent change of residential floorspace from long-term accommodation to short-term visitor accommodation let for periods of less than 90 days. Visitor lettings can also increase the incidence of noise, sometimes at unsociable hours, and generate high turnover of occupiers that harms community cohesion and increases the fear of crime. The Deregulation Act provides for the Council to seek to exempt particular properties or areas from the provisions that allow visitor lettings where this is necessary to protect the amenity of the locality. The Council will monitor the impact of visitor lettings and consider seeking exemptions if evidence emerges of harm to amenity in particular locations. Householders considering letting out their property are advised to check the terms of their leases, tenancies, insurance and mortgages, as these may contain restrictions that prevent them from letting the property to somebody else.

### **Net loss of homes**

- 7.67** The starting point for housing targets is the projected growth in the number of households, and the needs of these households can only be met by net additions to housing numbers. Every home that is lost through redevelopment or conversion is a home that needs to be replaced. Since March 2008, approximately 50 dwellings a year have been lost through development involving a net loss of homes. Around 40% were lost in developments involving loss of a single home, many of which combined two flats to create a single dwelling. The Council therefore aims to ensure that existing dwellings will continue to be available to meet housing needs and that the overall supply of housing will not be compromised by developments involving a net loss. Where development involves the demolition or other loss of homes, the Council will generally expect it to provide a similar or greater number of replacement dwellings, to an equivalent or better standard than the homes removed.
- 7.68** However, the Council also recognises that there are situations where the loss of individual homes may be justified. Policy H3 indicates that such losses may be acceptable in the situations set out in the next four paragraphs.
- 7.69** Net loss of one home is acceptable when two dwellings are being combined into a single dwelling. Such developments can help families to deal with overcrowding, to grow without moving home, or to care for an elderly relative. Within a block of



flats or apartments, such a change may not constitute development. However, the Council will resist the loss of two homes or more within the same building or site, whether through individual applications or a series of increments over the period since the adoption of this policy approach in June 2006, taking account of any extant permissions that remain unimplemented.

- 7.70** A net loss of homes is acceptable when three or more dwellings are being combined to create an additional large dwelling (3 or more bedrooms) in the following four wards with a low proportion of large dwellings – Bloomsbury, King’s Cross, Holborn and Covent Garden and Kilburn. Data from the Census in 2011 and 2021 shows that less than 25% of households in these wards had three or more bedrooms (compared with over 30% across Camden).
- 7.71** We may permit proposals to combine three or more affordable dwellings to create a large affordable home (3 or more bedrooms). The existing stock of affordable housing (particularly Council housing) is heavily skewed to one and two-bedroom homes. The 2021 Census indicates that almost 19.7% of households in social rented housing are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 9.5% across all tenures.
- 7.72** We may permit proposals to combine three or more dwellings where the existing dwellings are 20% or more below residential space standards, provided the loss of dwellings is no greater than needed to meet the standards. Residential space standards are set out in the nationally described space standard and the London Plan.

### **Further guidance**

- 7.73** For the purposes of Policy H3 we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3) and will resist the net loss of small houses in multiple occupation. This reflects the freedom provided in legislation for changes between these uses without a planning application.
- 7.74** In some circumstances, where proposals would involve the loss of homes or residential floorspace, it may be appropriate for replacement homes or floorspace to be provided on an alternative site. We will have regard to Policy H2 - Maximising the supply of self-contained housing from mixed-use schemes when considering whether housing should be retained on-site or re-provided off-site.
- 7.75** Our supplementary planning document Camden Planning Guidance on housing provides further information about how we will apply Policy H3.

## **Maximising the supply of affordable housing**

- 7.76** Policy H4 applies primarily to the following types of housing:
- self-contained houses and flats (Use Class C3);
  - live/ work units, which are self-contained homes that include a dedicated work area (not in any planning use class; we will treat them as Use Class C3 when we apply Local Plan policies); and
  - houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and / or facilities (small houses in multiple occupation or HMOs, Use Class C4).

- 7.77** We will also apply Policy H4 to other types of housing, subject to the provisions of in this Plan and in the London Plan policies relevant to the particular housing type, although the mechanics of considering and securing affordable housing provision may vary having regard to Policy H4 criteria E(i) to (v).

## **Policy H4 - Maximising the supply of affordable housing**

- A.** The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable. The Council will aim to maximise the supply of affordable housing, meet or exceed a borough wide strategic target of 3,000 additional affordable homes from 2026/27 - 2040/41, and achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.
- B.** We will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to housing floorspace of 100sqm GIA or more. The Council will seek to negotiate the contribution to affordable housing on the following basis:
- i.** the guideline mix of affordable housing types is 60% low-cost rented housing and 40% intermediate housing;
  - ii.** targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home;
  - iii.** targets are applied to additional housing floorspace proposed, not to existing housing floorspace or replacement floorspace;
  - iv.** a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;
  - v.** an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;
  - vi.** targets and the guideline mix will be applied having regard to the London Plan's housing policies and viability threshold approach where applicable;
  - vii.** for developments with capacity for 25 or more additional homes, the Council may seek affordable housing for older people or other people with care or support requirements as part or all of the affordable housing contribution;
  - viii.** where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;
  - ix.** for developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site; and
  - x.** where affordable housing cannot practically be provided on site, or off site provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing off site in the same area, or exceptionally a payment-in-lieu.
- C.** We will seek to ensure that where development sites are split, additional proposals are brought forward on the same site, or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution is comprehensively assessed for all the proposals together. The Council will seek to use planning obligations to ensure that all parts or phases of split or related sites make an appropriate affordable housing contribution.

- D.** We will apply the distinctive affordable housing provisions of the London Plan for build to rent housing, purpose-built student accommodation, and large-scale purpose-built shared living, but as an alternative will strongly encourage contributions of on-site affordable housing from such developments in accordance with the guideline mix set out in criterion (i) of Part B above where feasible, having regard to whether developments are able to include separate blocks and / or stair / lift cores.
- E.** In considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:
- i.** the character and size of the development, and any constraints on developing the site for a mix of housing including market and affordable housing or the particular types of affordable provision sought;
  - ii.** the impact on creation of mixed, inclusive and sustainable communities;
  - iii.** the impact of the mix of housing types sought on the efficiency and overall quantum of development;
  - iv.** the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors, such as build to rent housing; and
  - v.** whether an alternative approach could better meet the objectives of this policy and the Local Plan.
- F.** Having regard to the London Plan, where the development's contribution to affordable housing falls significantly short of the Council's targets due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek early, mid-term and / or late stage viability reviews to determine the maximum contribution to affordable housing deliverable by the development.

## Meaning of affordable housing

- 7.78** Affordable housing is provided to households whose needs are not met by the market. The London Plan supports two broad categories of affordable housing, low-cost rented housing and intermediate housing.
- 7.79** Low-cost rented housing comprises homes for Social Rent or London Affordable Rent. Eligibility is determined by the Council's Housing Allocation Scheme. Low-cost rented housing is mostly owned by the Council or Housing Associations, and is subject to national rent setting guidance. Social Rents are guided by a national formula rent, whereas London Affordable Rents are based on the national formula but subject to GLA benchmarks, which are slightly higher than formula rent in Camden.
- 7.80** Intermediate housing costs less than market housing but more than low-cost rented housing and is provided to households with low to medium incomes. Eligibility is controlled by income caps set in the London Plan (and updated in London Plan Guidance and Annual Monitoring Reports). In Camden, it generally takes the form of intermediate rented housing in accordance with the Council's Intermediate Housing Strategy, but intermediate housing can also include shared ownership and other forms of low cost ownership where these can be made affordable to eligible households. In some cases, occupation may be prioritised

or limited to key workers, such as health service staff, teachers and workers in emergency services.

- 7.81** The Council will seek planning obligations to ensure that affordable housing complies with these definitions, is available to Camden households that are unable to access market housing, and continues to be available at an affordable price in the future unless any subsidy is recycled. We will also ensure that the affordable housing is:
- delivered before or concurrently with any market housing forming part of the same proposal; and
  - delivered in strict accordance with Local Plan objectives by a provider (usually a Housing Association) approved by the Council.
- 7.82** The Mayor’s guidance on Viability and Affordable Housing advises that generally shared ownership is not appropriate where unrestricted market values of a home exceed £600,000. For the year ending September 2022, the average house price of newly built dwellings in Camden exceeded £800,000 and the average price paid by first-time buyers exceeded £600,000 in every month. Consequently, there is little prospect of delivering shared ownership at an affordable price in Camden.
- 7.83** In 2021 (shortly after publication of the finalised London Plan 2021), the Government introduced a product called First Homes, which is housing sold to first-time buyers at a discount, with the discount passed on at subsequent sales. In London, First Homes are to be sold to first-time buyers earning no more than £90,000 per year at a discount of at least 30% and at a price after discount of no more than £420,000. The GLA has issued guidance noting that in many cases discounts required in London to reach £420,000 would exceed 30%, while the homes are likely to be small, and accessible only to households close to the maximum eligible income.
- 7.84** The GLA guidance advises that in considering the potential for First Homes, decision-makers should continue to give weight to the London Plan, alongside the need for other affordable housing tenures, the level of discount required to reach the £420,000 price cap, and the impact this would have on delivery of other tenures. The Council’s 2022 Planning Statement on the Intermediate Housing Strategy and First Homes considered these matters in detail, and concluded that First Homes are not a suitable form of affordable housing for delivery in Camden, and their inclusion should not be sought in developments in the borough.
- 7.85** The NPPF advises that major developments (generally those involving 10 or more homes) should deliver 10% of homes for affordable home ownership. For the reasons set out above, the delivery of affordable home ownership in Camden is likely to be challenging. However, the Council will work with the GLA to assess whether there is potential to address the NPPF requirement by delivering London Living Rent, which is a form of Rent to Buy, and is considered by the London Plan to be an affordable home-ownership product.
- 7.86** More detailed information on the mix of affordable tenures and rent levels sought in Camden and the Intermediate Housing Strategy are included in our supplementary planning document Camden Planning Guidance on housing.

## **Strategic affordable housing target**

- 7.87** The London Plan 2021 sets a strategic target for 50% of all homes across London to be genuinely affordable, based on the findings of the 2017 London Strategic Housing Market Assessment that 47% of the housing need in London would be for low-cost rent and a further 18% would be for intermediate housing. Similarly, the Camden Housing Needs Update for 2021 39 indicates that 49% of housing need in Camden will be for low-cost rent, and a further 27% will be for intermediate housing.
- 7.88** To set this Plan's target for affordable housing we have taken the overall housing target (including market housing), and estimated the maximum number of affordable homes likely to be viable and deliverable, taking into account affordable housing need, the relationship between development costs, the value of market and affordable homes, the funding available from the Mayor's Affordable Homes Programme, the income households have to spend on housing, past levels of delivery and the anticipated housing output of the Council's Community Investment Programme. Balancing these considerations, the Council proposes a strategic target of 3,000 additional affordable homes over the Plan period (200 per year).

## **Proposals that generate an affordable housing requirement**

- 7.89** In 2014, the government issued policy (now incorporated into the NPPF) creating a national affordable housing threshold of 10 homes, and advising that that affordable housing should only be sought from schemes above this threshold. In the light of the scale of affordable housing need in the borough, through examination of the Camden Local Plan 2017 the Council was able to make a successful case for local departure from the national threshold. Policy H4 maintains the position in the 2017 Local Plan, which sought an affordable housing contribution from all schemes that involve additional housing floorspace of 100sqm GIA or more and provide at least one additional home.
- 7.90** Policy H4 also maintains three characteristics of the 2017 Local Plan which alleviate the risk of negative impacts from seeking affordable housing contributions from small schemes. The first of these is that the requirements only apply to net additions to housing floorspace – no requirement arises where existing homes are simply extended or replaced. The second of these is the use of a sliding scale for affordable housing targets from schemes which have capacity for fewer than 25 additional homes. The sliding scale has been designed to achieve the maximum reasonable contribution overall without deterring development, causing delays to decision-making, increasing the burden of financial viability appraisals, or risking creation of a high starting target that suppresses scheme or dwelling size. More information about the operation of the sliding scale is provided in paragraphs 7.98 to 7.102. The third relevant characteristic is that the Council will continue to accept a payment-in-lieu of affordable housing from schemes with capacity for fewer than 10 additional dwellings.
- 7.91** The case for seeking affordable housing contributions from schemes below the national threshold is undiminished. The Camden Housing Needs Update 2021 39 indicates that 63% of housing need in Camden will be from households unable to afford market rent. Similarly, the Camden Strategic Housing Market Assessment

2016 (SHMA) found a need for 10,200 affordable homes from 2016-2031, being 61% of the overall housing requirement for the period. Based on the SHMA, and the factors determining likely delivery set out in paragraph 7.88 above, the Camden Local Plan 2017 set a target for delivery of 5,300 additional affordable homes from 2016-31. Over the first five years of that Plan period (2016-2021), 923 additional affordable homes were delivered in Camden, which was just 27% of the five-year need (3,400) indicated by the SHMA, and 52% of the five-year target (1,767) set out in the Local Plan.

**7.92** For the purposes of Policy H4 we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3) and seek provision of affordable housing from proposals for one or more additional small houses in multiple occupation. This reflects the freedom provided in legislation for changes between these uses without a planning application. Where larger houses in multiple occupation are proposed, we will take the same approach unless the development qualifies as large-scale purpose-built shared living under the terms of the London Plan.

**7.93** Where market-led development of build to rent housing, specialist older persons housing, purpose-built student accommodation or large-scale purpose-built shared living is proposed, we will apply Policy H4 as far as appropriate, having regards to the specific provisions for these types of housing in this Plan and in the London Plan.

### **Basis for seeking affordable housing provision from specific proposals**

**7.94** Given the scale of affordable housing need in the borough, the Council aims to maximise the supply of affordable housing from each development site, having regard to the London Plan's 50% strategic target, and this Plan's strategic target for 3,000 additional affordable homes. Policy H4 criteria B(i) to (x) provide a common basis for negotiations while criteria E(i) to (v) set out factors that will determine what is reasonable in any particular case. The following paragraphs outline the operation of criteria B(i) to (x), while the subsequent section outlines criteria E(i) to (v). Our supplementary planning document Camden Planning Guidance on housing provides more detailed guidance on the operation of the criteria.

### **Guideline mix of affordable housing types**

**7.95** Provision of intermediate housing (between the cost of social rented housing and market housing) has some potential to retain middle income households in Camden and lessen social polarisation. However, high values in many parts Camden mean that the intermediate housing can be more expensive than the cheaper market housing available elsewhere in the borough or in nearby boroughs. To balance these considerations and take account of the relative needs found by the Camden Housing Needs Update 2021 39, the Council has set guideline percentages for the split of affordable housing types at 60% low-cost rented housing (homes for Social Rent or London Affordable Rent) and 40% intermediate housing.

**7.96** Intermediate housing for shared-ownership can help households into owner occupation, but in Camden it is rarely possible for providers to deliver shared-ownership housing that would be affordable for households with incomes close

to the median household income in Camden, and highly challenging to deliver schemes meeting the income thresholds set out in the London Plan. Given these constraints, we will strongly encourage provision of homes for intermediate rent, subject to the NPPF's affordable home ownership requirements and ongoing consideration of the appropriateness of London Living Rent. We will also encourage the development of innovative intermediate housing products that can be made affordable to a wider range of groups in Camden.

**7.97** The guideline mix will be applied flexibly taking into account the criteria in Policy H4, and in certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing. We will encourage a focus on low-cost rented housing where a proposal falls far short of the affordable housing target (e.g. below 30% affordable), or intermediate housing cannot be delivered for people in a range of incomes below the London Plan thresholds. Where a proposal substantially exceeds the affordable housing target (e.g. over 65% affordable), the Council may support development that only provides intermediate housing, and may also support development to meet the needs of a particular group (e.g. development by an NHS Trust for key health service workers).

### **Negotiating on the basis of capacity, floorspace and sliding scale**

**7.98** We will negotiate to seek an affordable housing contribution from schemes that involve additional housing floorspace of 100sqm GIA or more and provide at least one additional home, but will not seek a contribution from schemes that simply extend or replace an existing home. This will help us to expedite replacement of homes that are subject to damage or disrepair, and extension of homes for families that are growing or need space to care for a relative who is elderly or disabled.

**7.99** For schemes which involve additional housing floorspace of 100sqm GIA or more and at least one additional home, we will assess their overall capacity for additional homes, starting from the proposed addition to floorspace. Having regard to the nationally described space standard, we will generally assess an additional 100sqm GIA residential floorspace as having capacity for one additional home and associated ancillary space. In order to avoid deterring small extensions to existing residential blocks and or distorting the size of dwellings within them, we will not seek an affordable housing contribution from developments that involve less than 100sqm of additional residential floorspace, including:

- schemes that involve the subdivision of existing housing to create more homes;
- schemes that provide one home or more where the total floor area (including ancillary space) is below 100 sqm GIA (e.g. one home of 90sqm GIA or two homes of 45sqm GIA each).

**7.100** A development is able to provide a mix of large and small homes consistent with Policy H7 Large and small homes whilst complying with the space standard, providing necessary ancillary space (such as common circulation and bin and cycle storage) and achieving an average of no more than 100sqm GIA per home. We will therefore assess the capacity for additional homes on the basis of multiples of 100sqm GIA, rounding the additional residential floorspace to the nearest 100sqm GIA so the assessed capacity will always be a whole number. (Thus, an additional 1,200sqm GIA will generally have capacity for 12 homes, an additional 1,800sqm GIA will generally have capacity for 18 homes, and an additional 2,400sqm GIA

will generally have capacity for 24 homes.) However, we will take into account any constraints on capacity where existing buildings are converted, particularly listed buildings and other heritage assets. The assessed capacity for additional homes will be used to determine the percentage affordable housing required in accordance with sliding scale set out in Policy H4 criteria B(iv) and (v) and paragraph 7.88.

**7.101** We will apply affordable housing targets on the sliding scale directly to the proposed addition to residential floorspace rather than to the number of homes or 'units' or the capacity for additional homes. We will use the affordable housing targets to seek a proportion of the proposed addition to residential floorspace as on-site affordable housing, except in the case of proposals with capacity for fewer than 10 additional homes where we may accept a payment in lieu of affordable housing (see paragraph 7.105). The use of floorspace in negotiation ensures that we are able to secure large affordable homes with 3 bedrooms or more, and affordable homes with a second double-bedroom. Seeking large low-cost rented homes is consistent with the findings of the Camden Housing Needs Update 2021 39. Negotiating on the basis of number of 'units' or 'habitable rooms' would incentivise the delivery of small affordable homes and small second bedrooms, exacerbate the skew towards one- and two-bedroom homes in our existing affordable supply, and exacerbate the existing incidence of overcrowding in Camden's affordable housing.

**7.102** On the basis of the Camden Housing Needs Update 2021 39 and the Camden Local Plan Viability Study, the Council will apply a target of 50% affordable housing to development proposals that include housing and have capacity for 25 or more additional homes (subject to the viability thresholds set out in the London Plan). However, we have set a sliding scale target for smaller schemes involving one or more additional homes. The sliding scale starts from a target of 2% where there is capacity for one additional home, and increases on a 'straight-line' basis. Capacity for each further additional dwelling (or each 100sqm GIA additional floorspace) increases the target by 2%. Thus the target for a scheme with capacity for an additional 12 dwellings is 24%, at 17 additional dwellings the target is 34%, and at 22 additional dwellings that target is 44% (subject to London Plan viability thresholds).

### **London Plan Viability Thresholds**

**7.103** The Council will have regard to the London Plan viability thresholds prevailing at the time of determining an application, taking into account the proportion of floor area (GIA) in each tenure in accordance with Policy H4, and the proportion of habitable rooms in each tenure in accordance with the London Plan. The London Plan 2021 sets a threshold of 50% for publicly owned land and industrial land and a 35% threshold in most other cases. These thresholds may be amended through future London Plans or London Plan guidance. Considering the 2021 thresholds in tandem with Local Plan Policy H4, the 50% threshold will generally be relevant to schemes on public or industrial land with capacity for 25 or more additional homes, while the 35% threshold will generally be relevant to other schemes with capacity for 18 or more additional homes.

**7.104** Where a development is subject to Policy H2 - Maximising the supply of self-contained housing from mixed-use schemes, distinctive arrangements will apply to the operation of viability thresholds, as set out in association with Policy H2 and its supporting text.



## Whether the affordable housing should be provided on-site

- 7.105** The NPPF indicates that where affordable housing is needed, policies should set out to meet this need on site. However, in the case of proposals with capacity for fewer than 10 additional homes (1,000sqm GIA), we will accept a payment-in-lieu of affordable housing. We consider payments-in-lieu are appropriate for these minor schemes (in tandem with relatively modest floorspace requirements based on the sliding scale target) as the affordable housing required would rarely be equivalent to a whole dwelling, and the obstacles to on-site delivery would generally exceed the benefits. More information on payments-in-lieu is provided by paragraph 7.111.
- 7.106** In line with the NPPF, the Council's strong preference for larger proposals is for affordable housing to be provided on-site alongside market housing because this helps to create mixed and inclusive communities and ensure that the delivery of the affordable housing is secured to the same timescale as the market housing.
- 7.107** The Council accepts that there are some circumstances where it may be appropriate to deliver some or all of the affordable housing off-site. In considering whether off-site provision is appropriate, the Council will consider the criteria set out in Policy H4 and other relevant factors such as whether a greater number of affordable homes could be delivered through an off-site solution, whether it is practical for a single block to accommodate market and affordable homes, and the affordability of the anticipated service charges. Market and affordable housing have been successfully delivered alongside each other on a number of small sites in Camden, and the Council will expect developers to demonstrate that they have worked with affordable housing providers to consider fully whether the development can be designed to provide on-site affordable housing.
- 7.108** Where a development has capacity for 10 or more additional homes and the Council considers off-site provision is appropriate, the Council will take into account all related sites when assessing how much affordable housing is required. Where a development omits affordable housing, it will be possible to deliver additional market housing on-site, and the Council will expect to achieve a significantly enhanced affordable housing contribution off-site (in terms of quantity, quality and/ or affordability), having regard to the net additional market floorspace across all sites.
- 7.109** Where off-site provision is appropriate, we will seek development of the affordable housing on an alternative site nearby, secured by a planning obligation. Given the intense competition for sites in Camden, the Council will normally expect the planning obligation to ensure delivery of the affordable housing by specifying the anticipated delivery site (or sites).
- 7.110** All alternative sites must be in the borough, and will initially be sought in the same sub-area and within an 800 metre straight-line distance of the development (broadly equivalent to a ten-minute walk). Where the development is in the defined South Camden sub-area, and no appropriate South Camden sites are available within an 800 metre distance, the Council will subsequently seek the nearest appropriate site anywhere within the South Camden sub-area. Where the development is in the Central Camden, West Camden or North Camden sub-areas, if no appropriate sites are available in the same sub-area as the development and

within an 800 metre distance, the Council will subsequently seek sites anywhere in the same sub-area, and finally seek the nearest appropriate site anywhere outside the South Camden sub-area. As part of the consideration of off-site options we will explore with developers whether the affordable housing could be delivered on Council-owned land.

- 7.111** Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for affordable housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation. Payments-in-lieu are derived by calculating the affordable housing floorspace required as set out in paragraphs 7.99 to 7.102, and converting this to a payment using a 'cost' per sqm. More detailed information regarding the calculation of off-site provision and payments in lieu, including a formula for the 'cost' per sqm, is provided in our supplementary planning documents Camden Planning Guidance on housing and Camden Planning Guidance on planning obligations.

### **Provision of affordable housing to meet particular needs**

- 7.112** Policy H4 provides for us to seek affordable housing to meet the particular needs of older people, or other people with care or support requirements, in association with any developments involving housing where they have capacity for 25 homes or more. As indicated in Policy H8 - Housing for older people, homeless people and other people with care or support requirements and supporting paragraphs, the Council will focus on meeting care and support needs by providing support in existing homes (with adaptations where necessary), but new supported living accommodation may be needed for some groups such as people living with dementia and people with learning disabilities. We anticipate that a proportion of any new provision would need to be in the affordable sector, but the distinctive viability characteristics of supported living mean that affordable provision is unlikely to be delivered in conjunction with market-led supported living. We will only seek provision in schemes with capacity for at least 25 homes, as such schemes offer potential for affordable homes for older people, or other people with care or support requirements, to be clustered and benefit from coordinated support. In considering whether affordable housing should be sought for older people, or other people with care or support requirements, and the scale and nature of provision, the Council will also take into account all relevant criteria in Policy H4 - Maximising the supply of affordable housing and Policy H8 - Housing for older people, homeless people and other people with care or support requirements.

### **Split sites and related sites**

- 7.113** Where a site or a group of related sites becomes available for development, the Council will expect proposals to take the form of a comprehensive scheme rather than piecemeal development, and will expect a single assessment of the maximum reasonable amount of affordable housing taking account of all components. We will seek to resist schemes that are artificially split into a series of proposals to avoid reaching the affordable housing threshold or the full 50% affordable housing negotiating target. Where there are proposals to extend a permitted scheme or increase the housing in the period before or shortly after completion, we will also

expect the affordable housing target to reflect the scale of the entire development. We will seek planning obligations to ensure that each part of a split or phased development makes an appropriate affordable housing contribution, having regard to the contribution that would arise from a single assessment across all components.

### **Achieving an appropriate mix of market and affordable housing types**

- 7.114** Policy H4 criteria E(i) to (v) indicate the factors that we will consider when assessing the mix of market, intermediate and low-cost rented housing appropriate for a site, and whether any off-site delivery of affordable housing is appropriate. Details of how these criteria will be applied are set out in our supplementary planning document Camden Planning Guidance on housing (including the assessment of financial viability), but a number of key considerations are set out below.
- 7.115** The character of the development and the size of the site (including the ability to accommodate additional entrances and circulation spaces) will influence whether it can accommodate a mix of market and affordable housing. Factors to be considered include whether existing buildings need to be retained on-site (e.g. heritage assets), whether dual-aspect homes and large homes of 3 or more bedrooms can be incorporated (particularly for low-cost rented housing), and the implications of anticipated service charges on the cost of affordable housing.
- 7.116** Most areas in the borough also have reasonably mixed and sustainable communities, and include an existing mix of market and affordable housing. However, there are some areas that have a very high proportion of market housing or low-cost rented housing, which may sometimes influence whether on-site or off-site affordable housing is most appropriate, and/ or the most appropriate mix of affordable housing types.
- 7.117** In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability, including the availability of public subsidy, particular costs associated with the development (such as restoration of heritage assets and remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build to rent housing). Subject to the London Plan viability threshold approach, we will expect submission of a financial viability appraisal to justify the proportion of affordable housing proposed and demonstrate that the proposed affordable housing is deliverable, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. The Council will also seek funding from the developer for an independent verification of the appraisal.
- 7.118** Where financial viability constraints prevent the development from meeting the affordable housing target, and there is a prospect of viability improving prior to delivery, the Council will expect a viability review (or reviews) subject to the London Plan's viability threshold approach, and will seek an increased affordable housing contribution if viability improves over time. For schemes defined by the London Plan as viability tested schemes, the Council will expect a late stage

viability review to take place when costs and receipts are known as far as possible. For schemes defined by the London Plan as fast track schemes, we will seek an early stage viability review at a specified period (usually two years after permission is granted). In the case of long-term schemes where phased implementation is anticipated, we may also seek mid-term viability reviews prior to implementation of later phases.

**7.119** Where an early stage or mid-term viability review shows that viability has improved since permission was granted, we will seek additional affordable housing on-site in accordance with the London Plan. Where a late stage viability review shows that viability has improved, we will seek a further financial contribution to self-contained housing, not exceeding the payment-in-lieu that would arise from the shortfall between the initial contribution and the affordable housing target. Our supplementary planning document Camden Planning Guidance on housing provides more detailed guidance on viability review mechanisms.

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

## Protecting and improving affordable housing

**7.121** Policy H5 seeks to protect all affordable housing floorspace in the broad sense of housing that is provided at less than market costs, whether the reduced cost arises from the nature of the homes, the occupants, or the providers, or a formal affordable housing designation. It seeks particularly to protect:

- low-cost rented housing and intermediate housing managed by the Council, Housing Associations and other Registered Providers;
- key-worker accommodation, such as nurses' homes and hostels; and
- other low cost housing provided in connection with a job, such as a caretaker's flat.

**7.122** Other policies in this section also provide more specific provisions protecting particular types of housing as follows:

- housing for older people, homeless people and other people with care or support requirements is protected by Policy H8;
- student housing is protected by Policy H9;
- other housing where occupiers do not live as a family but are long-term residents sharing some rooms and/ or facilities (such as bedsits) is protected by Policy H10.

**7.123** Losses of affordable housing may not always be subject to planning control, for example where the housing is ancillary to another primary use (e.g. a nurses' home provided as part of a hospital), and no change is proposed to the primary use.

## Policy H5 - Protecting and improving affordable housing

- A. The Council will aim to protect, improve and increase the existing stock of affordable housing in Camden, and to maintain and improve the mix of affordable housing types and sizes.
- B. The Council will resist development that would involve a net loss of any type of affordable housing floorspace.
- C. The Council will work to regenerate existing estates and provide more and better affordable homes through the Community Investment Programme and Better Homes Programme.
- D. We will consider estate regeneration proposals following the approach set out in the London Plan, expecting retention or replacement of all existing affordable housing floorspace (including all existing floorspace in low-cost rented housing) and expecting the maximum viable addition to affordable housing floorspace, having regard to the guideline mix of affordable housing types in Policy H4.

### Loss of affordable housing

- 7.124** As indicated in Policy H4 Maximising the supply of affordable housing, Camden has a particularly large requirement for additional affordable homes. However, the number of households living in social rented homes in the borough fell by around 3,000 between the 2001 Census and 2021 Census, widening that gap between need and supply. In the last 25 years there has also been a reduction in the amount of housing provided for nurses and other health service workers. The Council therefore protects existing affordable housing against further losses.
- 7.125** The existing stock of social rented housing is heavily skewed to 1 or 2-bedroom homes, and overcrowding in the existing stock creates a compelling need for an additional supply of large affordable homes with 3 or more bedrooms. Older accommodation for health service workers often has shared facilities such as kitchens and bathrooms, whereas contemporary demand from key workers is for self-contained accommodation. To take account of this mismatch between supply and demand, the Council seeks to protect affordable housing floorspace rather than each individual affordable home, and will support proposals that adapt affordable homes to fit contemporary and future needs, for example by combining small flats. Where such adaptations take place, the Council will seek to ensure that arrangements are in place to re-house all existing occupiers.
- 7.126** Redevelopment of affordable housing should generally provide new low-cost rented housing to replace existing low-cost rented homes, and new intermediate affordable housing to replace existing intermediate homes. Where the existing housing is for key workers or provided in connection with a job, redevelopment should provide for the same group of occupiers unless their needs have been met elsewhere, in which case low-cost rented housing and intermediate housing will be sought. The Council will consider the mix of replacement affordable housing types flexibly, and seek to address mismatches between supply and demand, having regard to Policy H4 -Maximising the supply of affordable housing. The

Council will also be flexible in considering replacement affordable housing on an alternative site in the same area provided that the replacement housing will contribute to creating a mixed, inclusive and sustainable communities.

- 7.127** Housing and affordable housing required in association with Policy H2 - Maximising the supply of self-contained housing from mixed-use schemes, and Policy H4 - Maximising the supply of affordable housing, should be provided in addition to any retained or replacement affordable housing arising under Policy H5, subject to the particular arrangements for estate regeneration set out in the London Plan and Local Plan Policy H5.

### **Camden's Community Investment Programme (CIP) and estate regeneration**

- 7.128** The Council launched its Community Investment Programme (CIP) in 2010 to provide new and improved schools, homes and community facilities despite huge cuts in government funding. CIP involves refurbishment of some parts of Council estates, and redevelopment in other parts. It aims to ensure that Council tenants live in good quality accommodation that meets contemporary standards. It also aims to deliver wider benefits by tackling health inequality, helping local residents to take advantage of employment opportunities, and making our communities more sustainable and resilient.
- 7.129** By 2022, with the planned CIP works to schools largely complete, the Council decided to expand the Community Investment Programme and refocus on delivery of affordable housing. Over the lifetime of CIP, the Council proposes to deliver 4,850 new homes, of which 1,800 will be new or replacement Council homes, and 350 will be new intermediate homes for rent. The Community Investment Programme will also generate funds for the Council's ongoing "Better Homes" programme, which refurbishes existing Council homes. Sites are generally allocated in this Plan for CIP estate regeneration proposals where they have been subject to local consultation and a formal decision to has been made to design a scheme.
- 7.130** The 2021 Census found that over 10% of Camden's households were renting affordable housing from providers other than the Council (primarily Housing Associations). A number of these providers have a substantial stock of affordable housing in Camden, and have the potential to bring forward their own estate regeneration schemes. Two site allocations in this plan relate to estates of non-Council affordable housing where the provider has advised us that they wish to bring forward regeneration proposals.
- 7.131** The purpose of estate regeneration is to improve housing conditions and quality of life for existing residents, as well as providing additional homes where possible. Unless additional market homes are provided, substantial costs will arise from refurbishing or replacing homes without any substantial return in terms of additional rents or sales. Consequently, the London Plan recognises that all estate regeneration should be subject to viability testing to determine how much additional affordable housing can be provided. The Council supports this approach, and will not apply the affordable housing targets in Policy H4 to estate regeneration schemes.

**7.132** The Community Investment Programme is a long-term strategy, and will involve relocating some occupiers while their homes are refurbished or redeveloped. Over the course of the programme, there may be redistribution of occupiers and of affordable housing floorspace from one part of an estate to another, or even from one estate to another. The Council will take a strategic approach to estate regeneration, taking into account the potential to attract investment and the benefits of mixed and inclusive communities. We will resist the loss of affordable housing floorspace across the programme as a whole, but may not resist localised or short-term losses provided a strategy is in place to ensure their replacement.

## Housing choice and mix

**7.133** The Council aims to achieve mixed, inclusive, sustainable and multi-generational communities in Camden by seeking a range of housing types suitable for households and individuals with different needs. Seeking a range of housing types, sizes, accessibility and affordability will help us deliver the Council's missions set out in We Make Camden to meet the needs of Camden's diverse communities by tackling inequality, addressing overcrowding, creating sustainable and resilient neighbourhoods, improving health and wellbeing, and securing a supply of housing suitable for individuals and families on low and middle incomes.

**7.134** We will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet general and particular needs. Given the limited size and high value of development sites in the borough, it will be challenging to deliver some of the housing types needed in Camden, particularly serviced plots for self-build housing and pitches for Camden's traveller community. Consequently, where larger sites (0.5 ha or greater) do come forward, we will expect housing development to provide for particular housing needs, including the needs of self-builders, taking into account the characteristics and constraints of the site and area.

## Policy H6 – Housing Choice and Mix

- A.** 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.
- B.** When negotiating the types of housing included in developments in Camden, we will:
- i.** seek a diverse range of housing products in the market and affordable sectors to meet the needs across the spectrum of household incomes;
  - ii.** encourage build to rent developments, purpose-built student accommodation and other developments of private rented housing where this will assist the creation of mixed, inclusive and sustainable communities and comply with all relevant Local Plan policies, including Policy H4 - Maximising the supply of affordable housing, particularly Part D;
  - iii.** seek provision suitable for families with children, older people, disabled people, service families, people wishing to build their own homes;
  - iv.** seek provision for gypsies and travellers in accordance with Policy H11;
  - v.** require a range of dwelling sizes in accordance with Policy H7 - Large and small homes; and

vi. require accessible and adaptable housing to be provided in accordance with Policy D3 - Design of Housing.

- C. Where housing is proposed as part of development with a site area of 0.5 ha or greater, we will expect the development to make provision for particular housing needs. For such sites, the Council will particularly seek to address the need for serviced plots available to people wishing to build their own homes but may also support the inclusion of build to rent development and the particular types of housing addressed by Policies H8, H9, H10 and H11. In considering the scale and nature of provision for particular housing needs that would be appropriate, the Council will take into account:
- i. criteria in Policies H8, H9, H10 and H11 where applicable;
  - ii. the character of the development, the site and the area;
  - iii. site size, and any constraints on developing the site for a mix of housing including provision for particular housing needs;
  - iv. the impact on creation of mixed, inclusive and sustainable communities;
  - v. the impact of provision for particular housing needs on the efficiency and overall quantum of development;
  - vi. the economics and financial viability of the development, including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build to rent housing; and
  - vii. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

## Housing products

**7.135** The Council will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet the general and particular needs of existing and future households. We will consider all the needs identified by Policy H6, including those addressed in detail by Policies H7, H8 H9, H10 and H11.

**7.136** The split between affordable housing and market housing will not secure housing suitable for households across a full range of incomes in Camden. There are wide gaps between the cost of housing at target social rents and the very cheapest privately rented housing, and between the costs of the cheapest private rented housing and the cost of entering owner-occupation. Local housing allowance (the benefit provided to help with private rents) is generally insufficient to cover the full cost of privately rented housing.

**7.137** These gaps are particularly wide in the case of large homes (with 3 or more bedrooms), with middle-income households (particularly those with children) increasingly squeezed out of Camden due to high housing costs, particularly those with children. This leads to greater social polarisation between lower income households in low-cost rented housing (homes for Social Rent or London Affordable Rent) and higher income households in owner occupation.

**7.138** Intermediate housing is intended to bridge the gap between low-cost rented housing and market housing. High capital values in Camden make it highly challenging to provide intermediate housing in the form of shared ownership housing that meets the income thresholds set out in the London Plan. For intermediate housing to tackle social polarisation effectively, it therefore needs to



include homes for intermediate rent and other innovative intermediate housing products that can be made affordable to a wider range of groups than homes for shared-ownership.

### **Build to rent development and private rented homes**

- 7.139** The private rented sector is currently the largest source of housing for people who are not eligible for social rented housing and cannot afford to buy. Private renting is thought to play a significant role in limiting the social polarisation in the borough, and the Council will seek to actively foster the sector and support private tenancies for people in housing need.
- 7.140** The National Planning Policy Framework and the London Plan promote building homes specifically for private rent (build to rent). This is a relatively new housing product, where homes are generally provided at a large scale and managed by a single commercial provider. We consider that build to rent development could potentially help to increase overall housing output in Camden, and could also help to reduce the pressure for occupation of family homes by groups of unrelated adults. However, the turnover of occupiers of private rented housing tends to be rapid (particularly given its popularity amongst young adults and students), so localised concentrations could potentially harm the stability and sustainability of a community.
- 7.141** Build to rent development may well attract less interest from families than development for market sale, and a different mix of dwelling sizes may be appropriate. Financial viability for build to rent development is different from developments built for sale because returns are realised over a longer period, and may mean that the appropriate level of affordable housing provision is lower. The Council will be flexible in the application of affordable housing and dwelling size policies to development of build to rent housing where we consider such housing will help to create mixed, inclusive and sustainable communities. We consider that build to rent has the best potential to contribute to a sustainable community where leases are available to occupiers for longer periods such as 2-5 years and a long-term commitment is in place to secure the management of the private housing element as rented accommodation. To address the form of leases available, ensure a long-term commitment to private rent, and otherwise secure high quality build to rent development, the Council will apply all relevant London Plan provisions for this sector, but will strongly encourage contributions of on-site affordable housing in accordance with the guideline mix set out in Policy H4.

### **Meeting the housing needs of different groups**

- 7.142** In determining applications for housing, we will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet the general and particular needs of existing and future households.
- 7.143** The specific housing needs of a number of groups in our community are addressed by individual policies in the Plan:
- Policy H6 addresses the overall need for a mix of housing types, the needs of service families, and the needs of people wishing to build their own homes;

- Policy H7 addresses the size of homes (number of bedrooms) needed for large and small families with children, single people, couples and other types of household;
- Policy H8 addresses homes for older people, homeless people and other people with care or support requirements;
- Policy H9 addresses the housing needed for students;
- Policy H11 addresses the accommodation needs of gypsies and travellers and travelling showpeople; and
- Policy D3 addresses the particular needs of people with physical disabilities and people who use wheelchairs.

**7.144** We will consider all the needs identified by Policy H6, including those addressed in detail through the policies set out above. The following paragraphs provide more information about particular housing needs that are not fully explained in other parts of the Plan.

### **Service families**

**7.145** The National Planning Policy Framework (NPPF) indicates that councils should plan for a mix of housing to meet the needs of various groups including the needs of service families. The government has made a number of commitments regarding housing members of the armed forces, including a requirement for councils to give additional preference to seriously injured service personnel who have urgent housing needs, referral schemes with a number of housing associations, tailored low cost home ownership schemes and assistance for necessary adaptations for injured service people.

**7.146** The Regent's Park Barracks is located in the borough, and is thought to be home to a number of Camden's service personnel. Camden's Local Plan policies seek provision of affordable housing, including intermediate housing such as low cost home ownership, and seek housing to suit people with physical disabilities and other support needs. We consider that the needs of members of the armed forces and their families can be met by giving them appropriate priority in the allocation of the housing intended to meet the needs of the wider community. Through the housing allocation scheme for low-cost rented housing, the Council gives additional preference to current and former members of the armed forces with a recognised housing need. The Council has also included service families in its priority list for intermediate housing.

### **People wishing to build their own homes**

**7.147** The NPPF indicates that councils should plan to meet the needs of people wishing to build their own homes. This is understood to refer to self-build and custom-build arrangements where prospective occupiers substitute their own skills for some of the services usually provided by a speculative developer. Self-build generally refers to people who bring their own building skills to bear as part of the construction process, whereas custom-build more often involves people who can provide professional services such as architecture or project management. In some cases custom-build can simply involve people who procure professionals to build a bespoke home to personal specifications rather than a speculative home built to a standard design.

- 7.148** Land costs in Camden are extremely high and the majority of housing output takes the form of flats built at relatively high densities. Consequently, the potential for people to acquire a site and use their own building skills to provide low cost homes is very limited. However, there is some evidence to suggest that custom-build for wealthier households is quite common in northern parts of the borough with a more suburban character. This sometimes involves infill sites and sometimes redevelopment of an existing residential plot. There may also be some interest in group self-build involving Council-owned land, possibly in association with the Community Investment Programme.
- 7.149** The Self Build and Custom Housing Building Act 2015 requires councils to create a public register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. The Act also provides for government to issue regulations about what the register should include and how it should work. The Council launched its own register for prospective self-builders in April 2016 and there were six individuals on the register as of September 2023.
- 7.150** Through the Housing and Planning Act 2016, the government requires councils to give permission for enough serviced plots to meet the demand for self-build and custom-build homes. The Act also provides a mechanism for councils to seek an exemption from this requirement.
- 7.151** There are no large areas of unused, underused or cleared land in Camden that would provide an immediate opportunity to create serviced plots. Furthermore, self-build and custom-build housing are likely to involve low density development, which would make it very hard for a prospective self-builder to compete with other developers to acquire land, and would also represent an underuse of land in many parts of Camden, in conflict with Policy H1 - Maximising housing supply and London Plan policies relating to good growth and design. Given these constraints, the Council considers that the best prospect for bringing forward suitable land will be in conjunction with the development of a large site involving other types of housing, and has made provision in Policy H6 for development of sites of 0.5 ha or greater to include serviced plots for self-build and custom-build.

## Large and small homes

- 7.152** Policy H7 - Large and small homes seeks a mix of dwelling sizes where the following types of housing are proposed:
- self-contained houses and flats (Use Class C3);
  - houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and/or facilities (Small houses in multiple occupation or HMOs, Use Class C4); and
  - live/work units, which are self-contained homes that include a dedicated work area (not in any planning use class, the Council will treat them as Use Class C3 when applying Local Plan policies).
- 7.153** Policy H7 applies wherever there is development that affects the mix of dwelling sizes for these housing types, whether the development involves construction of new buildings, extensions, alterations, conversions or changes of use, or includes the creation of separate homes from ancillary residential accommodation.

**7.154** Policy H7 does not apply to development intended to meet the particular needs addressed by Policies H8, H9, H10 and H11, such as housing for older people and purpose built student accommodation.

## **Policy H7 - Large and small homes**

- A.** The Council will aim to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce the imbalance between housing needs and existing supply.
- B.** The Council will seek to ensure that all housing development including the conversion of existing homes and non-residential properties:
  - i.** includes a mix of large homes (3 bedrooms or more) and small homes (studio flats, 1-bedroom and 2-bedroom) homes; and
  - ii.** contributes to meeting the Dwelling Size Priorities set out in the Table 5 below.
- C.** The Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, where the applicant can justify this having regard to:
  - i.** the different dwelling size priorities for each tenure;
  - ii.** any evidence that borough-wide priorities differ from needs in a particular area or the needs relating to a particular sector such as build to rent development;
  - iii.** the character of the development, the site and the area, and the impact of large homes on child density;
  - iv.** site size and constraints on developing the site for a mix of homes of different sizes;
  - v.** the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build to rent development; and
  - vi.** the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.
- D.** The Council will seek to minimise the loss of market homes with 3 bedrooms, particularly where the 3-bedroom homes have access to outside space.
- E.** Where development would involve conversion of a large home (3 bedrooms or more) to create additional self-contained homes, the Council will expect the converted property to include at least one 3-bedroom home.

**7.155** The Camden Housing Needs Update calculates the likely requirement for homes of different sizes in the market and affordable sectors based on the projected household composition over the Plan period, and the size/ tenure of dwelling that each household type is likely to occupy. It indicates that the greatest requirement in the market sector is likely to be for two- and three-bedroom homes. The greatest requirement in the affordable sector is likely to be for three-bedroom homes followed by two-bedroom homes and homes with four bedrooms or more.

**7.156** The Dwelling Size Priorities Table has been based on the outputs of the Camden Housing Needs Update, considered alongside the mismatch between the need for large affordable homes (indicated by overcrowding) and supply (indicated

by average number of bedrooms per household) and the cost constraints on delivering large intermediate homes. Dwelling sizes are expressed in terms of number of bedrooms and distinct priorities are identified for market housing, intermediate housing, and low-cost rented housing (homes for Social Rent or London Affordable Rent).

**7.157** The Council acknowledges that there is a need and / or demand for dwellings of every size shown in the Dwelling Size Priorities Table. The Council expects most developments to include some homes that have been given a medium or lower priority level. However, we have prioritised some sizes as high priority (primarily based on a high level of need relative to supply). The Council will expect proposals to include some dwellings that meet the high priorities wherever it is practicable to do so. In the low-cost rented housing we will give particular priority to large homes (with three or more bedrooms) at or around the level of guideline targets for social rents, as resources and development viability permit.

**Table 5: Dwelling Size Priorities Table**

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Low-cost rented	lower	medium	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

**7.158** Having regard to criteria C (i) to (vi) in Policy H7, the Council acknowledges that it will not be appropriate for every development to focus on the higher priorities in the Dwelling Size Priorities Table. However, we consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall, in accordance with clause B (i). Where possible a mix of large and small homes should be included for both the low-cost rented and the market housing. In accordance with clause B (i), the Council will also generally resist development proposals for self-contained general needs housing that contain only one-bedroom and studio flats.

**7.159** Camden Planning Guidance on housing currently indicates that the Council will aim for at least 50% of low-cost rented dwellings in each scheme to be large homes (3 bedrooms or more), and on the basis of mismatches in the existing stock we expect to retain this aim.

**7.160** The Council will be flexible when assessing development against Policy H7 and the Dwelling Size Priorities Table. The mix of dwelling sizes appropriate in a specific development will be considered taking into account the character of the development, the site and the area. The following paragraphs set out a number of the relevant considerations. Please see our Camden Planning Guidance on housing for further details.

### **Character of the development, the site and the area, and child density**

**7.161** Where a development involves reuse of an existing building, this may limit the potential to provide a range of dwelling sizes. Issues that can arise include the

creation of access via an existing staircase or lift, consideration of the integrity of existing structural walls and patterns of windows, changes in floor level, and significant features in heritage assets (including listed buildings and conservation areas) that may restrict alterations.

- 7.162** Flexibility around dwelling sizes may also be required to achieve a rational layout and the best possible accessibility arrangements. Adjustments to the mix may be needed to satisfy design and amenity concerns, such as minimising noise disturbance between flats – see also Chapter 12 of the Plan on design and heritage. The Council is working to return vacant properties to use, and will use the flexibility in Policy H7 to ensure that layout difficulties which limit the introduction of large homes do not prevent empty properties from returning to use, particularly upper floors above commercial premises.
- 7.163** Where a development is for the conversion of existing homes (including the creation of self-contained homes from residential accommodation that is ancillary to another use), the Council will seek to minimise the loss of market homes with 3 bedrooms, particularly where the 3-bedroom homes have access to outside space. Where development would involve conversion of a large home (3 bedrooms or more) to create additional self-contained homes, the Council will expect the converted property to include at least one 3-bedroom home.
- 7.164** Conversions involving affordable housing should retain or re-provide any existing large affordable homes unless the creation of small homes will allow the release of other large affordable homes that are currently under-occupied. Conversions that involve the loss of existing homes should also comply with Policy H3 Protecting existing homes.
- 7.165** When considering the proportion of large homes appropriate within a specific development, the Council will take account of any features that make the development particularly suitable for families with children. The Council will also take into account the flexibility that larger dwellings create for other types of households, allowing for arrangements such as shared households and adults caring for elderly or infirm relatives. A number of features are listed here that help to make developments suitable for children to live in, and where a number of these features are present, we will expect the inclusion large homes, and particularly seek the inclusion of four-bedroom low-cost rented homes. Child-friendly features include:
- the potential to provide space on site where children can play (open space or private amenity space);
  - dedicated children’s play space available nearby;
  - a number of homes with direct access to the street, private amenity space or open space;
  - no direct access to a major road;
  - a limited number of homes served from each internal corridor and each communal staircase or lift; and
  - potential to provide a broad range of dwelling sizes in the development appropriate for new families with very young children and established families with older children.
- 7.166** There are relatively few opportunities in Camden for housing development that will provide more than one or two of these features. The Council does not consider

that the absence of any or all of these features justifies the omission of large homes from a development, and that all criteria in Policy H7 should be fully considered.

- 7.167** High child densities can cause difficulties in some circumstances, typically where large numbers of children in the same age-group grow up in an environment with limited safe external recreation space. The Council will take account of existing child densities in an area and the likely child density of the proposals and consider whether mechanisms such as a sensitive lettings policy should be used to manage child density, or whether a reduced proportion of large homes would be appropriate.

### **Development economics, financial viability, and demand**

- 7.168** As indicated in the paragraphs supporting Policy H1, the Council intends to be flexible in pursuit of its policy objectives, and will take into account the findings of our monitoring of housing supply in the light of economic circumstances. The Council may vary the range of home sizes sought in order to maximise housing delivery.
- 7.169** Large affordable homes are expensive to build relative to their rental value and are challenging to provide under the current grant framework, but they are a high priority for the Council and the London Plan. The demand for market homes of different sizes can vary across the borough and change quite rapidly, so that small homes generate higher values per square metre in some circumstances, and large homes generate higher values per square metre in others. The Council recognises that the rigid application of dwelling size priorities can prejudice the financial viability of a development, and will consider adjusting the mix of dwellings (particularly the mix of market dwellings) in order to achieve the maximum reasonable amount of affordable housing floorspace on the site.
- 7.170** The Council may support development that exceeds our affordable housing target and provides affordable housing for a particular group, e.g. intermediate housing designed to provide discount home ownership for first time buyers. When considering such proposals we will operate Policy H7 flexibly having regard to the needs and financial resources of the intended occupiers.

### **Housing for older people, homeless people and other people with care or support requirements**

- 7.171** Policy H8 relates primarily to housing made available specifically for occupation by older people (people who are approaching pensionable age or have reached it, typically aged 55 years or older) and housing made available specifically for occupation by homeless people or other people with care or support requirements, who need varying levels of support to enable them to live safely and securely. In addition, part B of Policy H8 encourages adaptation of homes occupied by older people or other people with care or support requirements to help them remain in their own homes.
- 7.172** The term 'other people with care or support requirements' refers to a very broad group of people who need some kind of support with their living arrangements. Examples include people using mental health services, people with learning

disabilities, looked-after children/ young people leaving care, people at risk of domestic violence, people with alcohol or drug dependencies, and people leaving prison. Often individuals have multiple support needs, such as people with both physical and learning disabilities, elderly people with a mental illness, and homeless people with a drug dependency.

- 7.173** Policy H8 adopts the term ‘specialised housing’ to relate to all housing made available specifically for occupation by older people, homeless people or other people with care or support requirements. Depending on the nature of provision and the level of care and support, housing provided for these groups may also be known as ‘supported housing’ or ‘care homes’. In addition, the London Plan provides a detailed definition of ‘specialist older persons housing’, which is essentially self-contained housing (usually with a range of communal facilities) where personal care is available but contracted separately. Examples of different types of provision include:
- sheltered housing - clusters of accommodation where people live independently in self-contained homes and where some support is available, possibly on-site (usually within Use Class C3);
  - extra-care housing – also independent living in self-contained homes, but designed to enable provision of additional support as occupiers’ needs increase, with on-site care generally available. On-site facilities may also provide support for residents in the wider community. Shared lounges and other social and leisure facilities are sometimes provided. Care home accommodation may also be included on-site (extra-care homes are usually within Use Class C3, but this may vary depending on the level of self-containment of the homes and the level of care provided);
  - care homes where support and care are available 24 hours a day – commonly bedsit rooms with shared lounges and eating – this may involve residential care only, nursing homes staffed by qualified nursing staff, or dual-registered care homes where medical assistance is provided to occupiers that need it (care homes are usually within Use Class C2);
  - small supported living schemes – homes shared by no more than 6 people living as a household with support available, sometimes on-site (within Use Class C3); and
  - hostels occupied by people with a shared support need (typically more than 6 people), most commonly homeless people (hostels are outside any use class).

- 7.174** With the exception of part B, Policy H8 does not address homes that happen to be occupied by older people or people with support needs, but are not designated for use by these groups. Specifically, other policies deal with:
- hospitals and boarding schools – see Policy SC2;
  - hostels aimed at tourists and backpackers – see Policy IE5; or
  - student housing – see Policy H9; or
  - houses, flats and other hostels shared by 3 or more occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (such as bedsits and hostels for migrant workers) – see Policy H10.



## Policy H8 – Housing for older people, homeless people and other people with care or support requirements

- A.** The Council will assist older people, homeless people and other people with care or support requirements to live as independently as possible by: encouraging adaptations that enable them to remain in their existing homes; supporting adaptation/ replacement of existing specialised housing to meet contemporary needs; seeking a proportion of housing and affordable housing in larger housing developments to meet the specific needs of these groups; supporting development of a variety of specialised housing; and resisting the net loss of existing specialised housing floorspace.
- B.** We will encourage and support development that adapts existing homes occupied by older people or other people with care or support requirements to enable them to live independently and safely in their own homes.
- C.** We will support development that adapts or replaces existing specialised housing for older people, homeless people or other people with care or support requirements to meet contemporary needs where this would be consistent with the criteria in part F of this policy.
- D.** In accordance with Policy H4 - Maximising the supply of affordable housing, the Council may seek affordable housing to meet the specific needs of older people, or other people with care or support requirements, as part or all of the affordable housing contribution from developments that include housing and have capacity for 25 or more additional homes.
- E.** In accordance with Policy H6 - Housing choice and mix, we may also support the inclusion of housing to meet the specific needs of older people, homeless people or other people with care or support requirements, where housing is proposed as part of a development with a site area of 0.5 ha or greater and the specialised housing would be consistent with the criteria in part F of this policy.
- F.** We will support development of a variety of specialised housing for older people, homeless people and other people with care or support requirements provided that the development:
- i.** is targeted towards existing borough residents;
  - ii.** meets demonstrable needs of Camden's older people, homeless people, or other people with care or support requirements, in terms of the type of facilities, the level of independence, and the provision of suitable support and/or care;
  - iii.** is accessible to social networks, social infrastructure and transport infrastructure appropriate to the needs of the intended occupiers;
  - iv.** contributes to creating a mixed, inclusive and sustainable community;
  - v.** does not cause harm to nearby residential amenity;
  - vi.** meets relevant design requirements of this Local Plan and the London Plan, particularly in relation to accessibility for disabled people; and
  - vii.** in the case of any market-led development of specialised housing that contains self-contained homes or provides specialist older persons housing (as defined by the London Plan), makes a contribution to the supply of affordable housing in accordance with the London Plan and Local Plan Policy H4.

- G.** We will resist development that involves the net loss of existing specialised housing floorspace unless either:
- i.** the existing housing is shown to be surplus to needs within the borough; or
  - ii.** it can be demonstrated that the existing housing is incapable of meeting contemporary standards or providing suitable support and/or care; or
  - iii.** adequate replacement accommodation will be provided that satisfies the criteria in part F of this policy; or
  - iv.** the loss of floorspace is necessary to enable the development of housing for the same group that satisfies the criteria in part F of this policy and is better able to foster independent living and meet any changes in their support and care needs; or
  - v.** the development will otherwise enable the provision of an alternative form of housing, support or care that better meets the objectives of this policy and the Local Plan.
- H.** Where the Council is satisfied that a development involving the loss of specialised housing floorspace is justified, we will expect it to create an equivalent amount of floorspace for either:
- i.** an alternative form of specialised housing that satisfies the criteria in part F of this policy; or
  - ii.** permanent self-contained housing (in Use Class C3), including an appropriate amount of affordable housing, having regard to the London Plan and Local Plan Policy H4.

**7.175** Policy H8 covers homes for a broad range of people who need housing that is tailored to their specific circumstances and provides access to support or care. The numbers of people needing some form of support is expected to increase over time due to factors such as greater identification of conditions such as Autism, and growing numbers of older people with longer life expectancy.

**7.176** The Council is currently developing strategies to meet the needs of the various groups of people involved, but common themes across these groups are for the Council to provide 'floating' care and support and adaptations that enable people to remain in their own homes or to live as independently as possible in suitable alternative homes. The Council has established a Shared Lives service, where adults with care and support needs live in the homes of people who enable them to thrive and lead healthy lives as part of the community. We follow a Housing First approach where possible (providing for people to move directly into homes where they can be supported long-term), or take a pathways approach, which involves temporary periods in supported accommodation for people as they prepare for independent living. While a high proportion of needs will be met by enabling people to live in suitable homes in the general housing stock, we anticipate that that some development of supported housing will be needed to replace unsuitable facilities and cater for a range of diverse needs across the population. To enable new provision to be used by a wide range of residents, including those with multiple and complex support needs, wherever possible it should be Autism- and dementia-friendly.

**7.177** Accessibility is often a key issue for older people and other people with care or support requirements. Accessible housing is required by many older people, and people of all ages with a physical disability, including a significant proportion of

people with learning disabilities who also have a physical disability. Many other people also benefit from accessibility measures. The Council will seek to maximise opportunities for people to live independently in their own homes by ensuring that all new homes are designed to be accessible and adaptable where feasible, and that a proportion of new homes are wheelchair adaptable dwellings or wheelchair accessible dwellings (homes that are fully fitted out for occupation by a household with a person who uses a wheelchair) in accordance with Policy D3 - Design of Housing. We will also seek to ensure that there are some larger sized wheelchair accessible homes available for people who need to use non-standard wheelchairs. The Council also adapts general needs housing to meet the specific needs of its occupiers. We will aim to make better use of existing adapted and adaptable housing in our borough to meet the needs of people with physical impairments including older people.

- 7.178** A significant number of older people and other people with care or support requirements, are supported in residential and nursing care homes, many of which are operated by Housing Associations or private providers. Having regard to its duties under the Care Act 2014, the Council seeks to shape the market in care provision jointly with other authorities across North Central London (Barnet, Enfield, Haringey and Islington).
- 7.179** The following paragraphs examine six particular need groups and provide an outline of the housing support currently offered to them and their anticipated future needs. There will also be many other groups needing housing support, and the groups outlined are simply those that represent a significant proportion of overall support needs. The identification of future needs is an ongoing process, and those presented here represent a snapshot of current thinking across the relevant services. Over the Plan period, it is likely that the range and scale of needs will change as new evidence and new pressures emerge.

### **Older people**

- 7.180** Nationally, the number of people over 65 is forecast to grow dramatically over the next 20 years, and the number of people over 85 will more than double. This issue is less pronounced in Camden as the population profile is skewed towards young adults, nevertheless, the number of people aged over 75 is expected to increase by around 40% over the Plan period.
- 7.181** There is a large stock of sheltered housing in Camden, involving over 1,500 homes managed by the Council or by Housing Associations. This housing often offers very limited support, and is often not well designed for disabled people or for care and support staff to provide assistance. It is likely that a proportion of this stock will need to be adapted or replaced over time to enable its use by residents with support needs. In some cases, sheltered housing may be adapted to provide Extra Care housing.
- 7.182** Extra Care housing is designed to enable provision of additional care as occupiers' needs increase, with on-site care generally available. It takes the form of self-contained homes with some communal facilities, such as a shared lounge. It was originally conceived with the needs of older people in mind, but is now viewed as an intergenerational resource. It can often meet needs that would otherwise be met in residential care homes. There are currently around 180 Extra Care homes in

Camden. We anticipate that one new Extra-Care facility with around 40-45 homes will be needed in the first 10 years of the Plan period.

**7.183** The Council currently supports over 300 older people in care homes with residential or nursing care. Around 200 supported places are outside the borough, but over half are in North Central London. Our aim is to reduce the number of places in low-level care facilities through provision of re-ablement services, care and support at home, and an expansion of Extra Care. We will also seek to commission 20 new nursing care places, either in the borough or elsewhere in North Central London.

## **Mental health**

**7.184** The Council supports around 200 places in supported housing in the borough. These are split over many properties, of which one is owned by the Council and the remainder by Housing Associations. Only a quarter of these places are in properties which are wholly fit for purpose. Just under a half are thought to be capable of renovation, and the remaining quarter will need to be replaced. Almost three-quarters of places are for people with high support needs and staffed for 24 hours, 7 days a week. The Council also supports a small number of places outside Camden for people with specialist mental health needs.

**7.185** For new and replacement provision, we expect each development to involve 12-15 self-contained flats. Our aspiration is for developments to be accessible to disabled people, provide self-contained flats or flats with en-suite bathrooms, provide adequate space for staff and resident communal space, have inbuilt security features and outdoor open space, and be in an area of low street activity. We anticipate that at least two schemes will be required to replace current provision that is not fit for purpose, and one to accommodate the impact of population growth.

**7.186** The Council currently supports 25 places in residential or nursing care homes in Camden for people needing mental health support, and just over 100 places elsewhere. One property in the borough (providing 13 beds) is not fit for purpose, and we anticipate that replacement provision will be required. Population growth could also generate need for a further 35 places in care homes over the lifetime of the Plan. The Council is considering its strategy for meeting future care needs.

## **Learning disabilities**

**7.187** The Council supports just under 100 places in supported housing in the borough for residents with learning disabilities. These are split over almost thirty properties, primarily owned by Housing Associations. Many are too small to operate efficiently, lack self-contained flats or en-suite bedsits, and are deficient in access for those with physical disabilities. The Council currently anticipates seeking remodelling of one property to provide four replacement places, and commissioning new development to provide around twelve replacement places. In addition, the Council supports around 30 places outside Camden.

**7.188** For new and replacement provision, we expect each development to be accessible to disabled people, provide 4-6 places in individual self-contained flats or en-suite bedsits, and provide adequate space for staff and resident communal space. New

provision should be Autism-friendly and suitable for those with complex needs. We anticipate that two to three schemes will be required to replace current provision. In addition, we anticipate that four further schemes will be required in the first 10 years of the Plan period to accommodate new needs, and potentially one or two further schemes in later years. We will also aim to provide a facility with 4-6 beds to provide emergency and respite care.

**7.189** The Council currently supports people with learning disabilities in care homes outside Camden. These include around 70 places in residential care homes and 16 in nursing care homes. Nursing care places are secured in North Central London as far as possible.

## **Autism**

**7.190** The Council has a duty to provide services for Autistic adults and children. People with Autism that need support often do so because of a co-existing mental health need or learning disability, and many already draw on care and support from services. The Council is carrying out an assessment of current and future needs for Autistic adults and children, but currently expects to focus on ensuring that all new provision of supported housing and care homes is Autism-friendly rather than developing Autism-specific accommodation. We are also considering advice and adaptations we can offer to better support neurodiverse people living in their own homes across all tenures.

## **Children and young people**

**7.191** People up to the age of 25 are supported by the service for young people. Children are supported in foster care wherever possible, but the service also supports a seven-bed children's home for 12-17 year olds where no suitable foster carer can be provided. The Young People's Accommodation Pathway provides a variety of support, including support visitors and specialist support for young parents and those with mental health needs. The Pathway provides over 230 beds across almost 30 properties in Camden, mostly owned by Housing Associations.

**7.192** The Council is to undertake a detailed needs analysis to inform our future strategy. Emerging needs are for a smaller children's home providing therapeutic support for those with complex needs, locally based respite and emergency care for those with complex needs who are aged 18 or under, and an additional facility for young people with mental health needs (the current facility is funded exclusively for former looked after children/ care experienced people). Challenges we will need to tackle include:

- a high proportion of our needs is for unaccompanied children who are asylum seekers, often with complex emotional needs related to trauma and loss;
- risk of exploitation and abuse;
- placements for children with complex needs are often outside London and very expensive;
- provision for young people in the borough is often in inappropriate and out-dated buildings.

## Homeless adults

- 7.193** The Council works to prevent homelessness, guide households into more settled accommodation, and operates a 'pathway' approach that gradually prepares single homeless people for independent living. For homeless families, the Council's focus is to reduce the need for temporary accommodation by helping families into longer-term housing solutions. The Council is currently supporting more than 600 people in the 'adult pathway', and over 70 people have been supported through Housing First.
- 7.194** Through the Community Investment Programme (CIP), the Council has been carrying out a series of developments to ensure our supported accommodation for homeless people meets contemporary needs, redeveloping or remodelling and extending facilities where appropriate, and decommissioning the least suitable facilities. Modernised hostels for single people have been provided at Mount Pleasant and Holmes Road. Works are ongoing to replace two small facilities for single homeless people at 248-250 Camden Road and 2 Chester Road with expanded facilities suitable for homeless families. Emerging needs are for a fully accessible purpose-built hostel for people with complex needs and a specialised women-only hostel.

## Meeting future needs for Council-commissioned housing support

- 7.195** To meet the anticipated needs for supported housing services commissioned by the Council, we will need to take advantage of a variety of opportunities. This is likely to involve working with our Community Investment Programme (CIP) or with Housing Associations and other providers. Opportunities could involve adapting or replacing facilities that no longer fit for purpose under Part C of this policy, or encouraging the inclusion of specialised or supported housing on large development sites (those with an area of 0.5 ha or greater) under Part E. We also anticipate that a number of small supported housing facilities could be negotiated as part or all of the contribution to affordable housing through Part D of this policy operating in tandem with Policy H4 where a residential development has capacity for 25 or more additional homes. In all cases, the appropriateness of new provision will be assessed under the criteria set out in Part F of this policy.

## Assessing proposals for new provision

- 7.196** Part F of Policy H8 sets out basic criteria for assessing proposals of specialised or supported housing. In terms of the Council's market shaping duties under the Care Act 2014 and the protection of existing services in the borough, key issues are the extent to which the proposal is intended to provide for existing borough residents and the fit between the particular care / support service and local needs. New facilities which saturate the local market for a particular type of support can lead to increased levels of vacancy and costs across that sector, and may ultimately lead to the failure of some providers and to the disruption of care and support for residents. Furthermore, facilities that primarily attract residents from other areas who initially fund their own care and support may place severe strain on the Council's budget if the long-proposed personal cap on self-funding is introduced. An example in Camden is the closure of a large nursing care home and establishment of a new service on the site which offers residential care for older

people requiring relatively low levels of support. The local market for low level residential care is already saturated, and take-up of places at the new service has been very limited to date.

**7.197** Criteria in Part F also address the appropriateness of the location. Key issues include the availability of suitable local networks and infrastructure, the effect of a proposal on the community's mix, and any adverse impact on residential amenity. Access to social networks and facilities are vital to prevent people in supported housing from becoming isolated. A concentration of people who have high support needs can unbalance the social mix in an area, create noise and disturbance and harm the amenity and quality of life for other local residents and visitors. The location and character of new provision should be such that antisocial behaviour can be avoided and occupiers can contribute to the balance and inclusiveness of community. Where appropriate, the Council will use conditions and/or legal agreements to control the management of housing for people drawing on care and support, and to specify the group or groups that it is intended to support.

**7.198** The Council will support proposals co-housing where this is consistent with Part F of Policy H8 and other relevant policies of the Local Plan. Co-housing is created and run by residents to provide a community encompassing a range of generations. Through the provision of shared facilities, meeting and play areas co-housing can encourage social interaction and community care for younger and older people. We recognise that opportunities for co-housing in the borough are limited by the high cost of land and the limited availability of sites, but opportunities may be increased through the provision of serviced plots for people wishing to build their own homes under Policy H6 - Housing choice and mix.

### **New market provision and affordable housing requirements**

**7.199** The London Plan provides a detailed definition of 'specialist older persons housing', which is essentially self-contained housing (usually with a range of communal facilities) where personal care is available but contracted separately. The London Plan provides indicative benchmarks for this type of housing to inform local level assessments, and sets a Camden benchmark of 105 additional homes per year up to 2029. There is a growing market for this type of accommodation, and two new schemes have been completed in Camden since 2019, although the local supply is relatively limited at present. The resources older people have to access such accommodation vary considerably depending on whether they own their existing housing, any other assets and investments they have, and whether they have an occupational pension.

**7.200** The London Plan indicates that affordable housing policies and the viability threshold approach apply to 'specialist older persons housing'. Consequently, when considering proposals for homes of this type, we will seek affordable provision in accordance with the London Plan and Local Plan Policy H4 - Maximising the supply of affordable housing. In applying affordable housing requirements, the Council will have regard to the distinct viability characteristics of the sector (such as costs and revenues from shared facilities and services, and provisions for termination of a lease), and the potential differences in the character of affordability between people of pensionable age and people of working age.

**7.201** In line with the London Plan, we note that the guideline mix of affordable housing types in Policy H4 may not be appropriate for specialist older persons housing. When considering the form of the affordable housing contribution, we will strongly encourage provision of a variety of tenures on-site to suit older people from different backgrounds, such as the inclusion of intermediate housing for those who would otherwise be unable to access specialist older persons housing. However, as an alternative, we will also support the delivery of on-site affordable housing for general needs in accordance with the guideline mix in Policy H4 part B(i) where this is feasible, having regard to whether developments are able to include separate blocks and / or stair / lift cores for the affordable element. In accordance with Policy H4 part B(x) where on-site provision would not be practical or achieve the best contribution, we may accept an off-site contribution, or exceptionally a payment-in-lieu.

### **Protecting existing provision**

**7.202** In the context of the high land values and limited supply of development sites in Camden, sites that are currently used for specialised housing represent an important resource. Such sites will tend to have a lower existing use value than general needs housing. They are likely to come under pressure for redevelopment for a higher value use, and once lost they will be very difficult to replace. Consequently, the Council will seek to retain these sites in specialised housing use in accordance with Part G of this policy.

**7.203** The amount and type of specialised housing required in the borough is changing, for example less sheltered housing will be required for older people with low support needs and more extra care provision will be required for older people needing intensive support. Some of the Council's existing provision is in properties that are not suitable to meet contemporary needs, including much of our provision related to mental health needs and learning disabilities. Where specialised housing is no longer suitable or needed to provide for a particular group of older people, homeless people or other people with care or support requirements, as indicated by Part H of this policy, we will consider whether it could be remodelled or redeveloped to meet the specialised housing needs of an alternative group in the borough. We will also consider whether it could be redeveloped to provide self-contained housing for people in the borough with support needs.

**7.204** As also indicated by Part H, where specialised housing is no longer suitable or needed for a particular group, and there are no suitable options to meet alternative needs for specialised housing in the borough, we will expect the site to be developed for self-contained general needs housing. We will resist the use of specialised accommodation in Camden to meet support needs arising outside the borough since the provisions of the Care Act 2014 mean that any development that attracts additional care users into the borough could have a significant impact on Council resources. In accordance with Policy H1 - Maximising housing supply and Policy H3 - Protecting existing homes, we will also resist the conversion of specialised accommodation with shared facilities (such as hostels for homeless people) into alternative accommodation with shared facilities and short-stay accommodation (such as houses in multiple occupation and backpackers' hostels). Hostels do not fall into a planning use class, so the Council will regard any material change to the use (including a change to the type of occupier) as development.



**7.205** When considering redevelopment for self-contained general needs housing, the Council will have regard to the affordable housing requirements and criteria set out the London Plan and in Local Plan Policy H4, and any need to generate funding to provide replacement housing elsewhere that meets the needs of older people, homeless people or other people with care or support requirements. If replacement specialised housing is provided elsewhere, we will consider the proportion of affordable housing provided across both sites. We will resist proposals for non-residential development in accordance with Local Plan Policy H3 - Protecting existing homes and will seek to retain existing affordable housing in accordance with Policy H5 - Protecting and improving affordable housing.

## Purpose-built student accommodation

**7.206** Policy H9 particularly relates to housing that:

- is primarily occupied by students, and managed by an education institution or an independent provider;
- is generally restricted to occupation by students during term-time;
- is generally let to each occupier for the duration of an academic year, and not less than an academic term; and
- provides some common facilities and/or services, although the extent of these can vary.

**7.207** Purpose-built student accommodation is the term used by the London Plan to refer to housing that is designed and managed specifically for occupation by students, but is required to comply with Policy H9 whether it is new-build accommodation or converted from other uses. The Local Plan uses the term “student housing” as a more concise way to refer to “purpose-built student accommodation”.

**7.208** Other policies in this plan contain specific provisions for some kinds of housing that may be occupied by students:

- other houses and flats shared by 3 or more occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (houses in multiple occupation or HMOs and large-scale purpose-built shared living) are considered in Policy H10;
- key-worker accommodation such as nurses’ homes and hostels are considered in Policies H4 and H5;
- self-contained houses and flats (including build to rent developments) are considered in Policies H2, H3, H4, H6 and H7; and
- hotels, serviced apartments and hostels aimed at tourists and backpackers are considered in Policy IE5.

**7.209** In this plan the expressions “academic term” and “term” refer to a continuous period of classes or learning, whether the year is divided into two, three or four. The minimum length of a term is usually eight weeks.

## Policy H9 – Purpose-built student accommodation

- A.** The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden’s international academic reputation.
- B.** The Council will seek a supply of student housing to meet or exceed Camden’s target of 200 additional places in student housing per year and will support the development of student housing provided that the development:
- i.** will not involve the net loss of self-contained homes;
  - ii.** will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it is shown that the site is no longer developable for self-contained housing;
  - iii.** complies with any relevant standards for houses in multiple occupation (HMOs) and provide safe, functional, adaptable and accessible spaces, including shared spaces, outdoor amenity space and laundry facilities;
  - iv.** includes a range of flat layouts;
  - v.** has a nominations agreement in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole;
  - vi.** will be secured for students at the area’s recognised higher education institutions, which will generally be those in Camden and adjoining London boroughs that are funded by the Office for Students;
  - vii.** will be accessible to public transport and will not have a detrimental impact on the transport network;
  - viii.** contributes to creating a mixed, inclusive and sustainable community;
  - ix.** does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity;
  - x.** will be let exclusively to the students specified in criterion (vi) for the full duration of all terms in the academic year;
  - xi.** will be managed as a single planning unit; and
  - xii.** will be accompanied by a Student Management Plan, and a Non-student Management Plan where alternative uses are proposed outside term-time.
- C.** The Council will seek to ensure the maximum level of affordable student accommodation is secured in accordance with the distinctive London Plan provisions for purpose-built student accommodation, but as an alternative will strongly encourage the contribution of on-site affordable housing in accordance with the guideline mix set out in Local Plan Policy H4 where feasible, having regard to whether developments are able to include separate blocks and/ or stair/ lift cores.
- D.** The Council will resist development that involves the net loss of student housing unless either:
- i.** it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing; or
  - ii.** adequate replacement accommodation will be provided that satisfies criteria B(i) to (xii) above; or
  - iii.** it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere.

**E.** Where the Council is satisfied that a development involving the loss of student housing is justified, we will expect it to create an equivalent amount of floorspace in another permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing having regard to Policy H4.

**7.210** Camden is home to many education institutions of national and international significance, notably ten publicly funded Universities. In addition, Camden has several other colleges that prepare young adults for higher education, and the Universities have advised that these colleges can support Camden's international academic reputation by helping them to attract students, particularly from overseas. The provision of higher education and research significantly contributes to Camden's ambition for its local economy to be strong, sustainable, and inclusive.

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

**7.212** The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year and proposes that 35% of student housing should be let at an affordable rent to nominees from one or more specified Higher Education institutions.

**7.213** The interest in developing student accommodation in the borough appears to have diminished since adoption of the previous Camden Local Plan and publication of the London Plan, as indicated by a number of schemes that benefited from planning permissions but have so far failed to progress to completion on-site. The main alternative source of accommodation available to students in Camden is private rented housing. The Council considers that the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market.

**7.214** Policy H9 sets out criteria that we will use to assess proposals involving student housing, including additions and losses. Details of how we will apply the policy are summarised below and set out more fully in the London Plan 2021 and our supplementary planning document Camden Planning Guidance on Student Housing.

### **Student housing target**

**7.215** The overall strategic requirement for purpose-built student accommodation in London was established through the work of the Mayor's Academic Forum, which identified a requirement for 3,500 additional purpose-built student accommodation bed spaces annually over the London Plan period.

**7.216** To calculate the Policy H9 annual target for purpose-built student accommodation, the Council has used the London Plan annual requirement and data for full-time resident students from the 2021 Census (March 2021, students aged 18 and over) and the Higher Education Statistics Agency (academic year 2021/22, students

registered at London's publicly funded higher education institutions). We have calculated Camden's share by taking the mid-point of the number of Camden resident students from the two sources, and dividing it by the mid-point of the number of London resident students, and concluded that Camden's resident students were 5.7% of the London total. Applying this to the London Plan 2021 annual requirement generates the Camden target of 200 additional student bedspaces a year adopted by Policy H9 as the minimum borough requirement.

### **Additional student housing and the priority for self-contained homes**

**7.217** Policy H1 indicates that self-contained housing is the priority land use of this Plan, while Policy H3 - Protecting existing homes resists proposals involving the net loss of self-contained homes. Given this priority, the Council will resist proposals for student housing which involve the net loss of self-contained homes, or the development of a site allocated for self-contained homes. The Council will also resist proposals involving the development of a site that has an existing consent for self-contained housing where the consented scheme would better meet Camden's housing needs and there is a reasonable prospect of the consent being implemented.

### **Space standards and quality of accommodation**

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

**7.219** In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation (HMOs), which apply to most student housing that is not provided by an educational institution. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. The Council will require proposals for student housing to comply with the relevant minimum standards. Drawings accompanying planning applications should demonstrate compliance with these minimum standards.

**7.220** In addition to the basic amenities expected from student housing (kitchen and personal hygiene facilities), the Council will expect developments to include shared lounges / recreation rooms, outdoor amenity space and laundry facilities. The Council will also support the inclusion of facilities that are open to the public in appropriate circumstances. Further guidance on the minimum HMO standards and our expectations and benchmarks for shared facilities is set out in our supplementary planning document Camden Planning Guidance on Student Housing.

**7.221** The Council will expect any scheme for student housing to incorporate design measures that promote personal safety and security and reduce the risk of crime and the fear of crime, in accordance with Policy A2 - Safety and Security. Applicants should consider the Secured by Design principles and guides, particularly Secured by Design Homes 2016 and any update or replacement guide,

and should discuss any scheme with Police Designing Out Crime Officers at the pre application stage. All management arrangements related to safety and security should be included within the management plan(s) for the development, secured as a planning obligation.

### **Wheelchair accessible rooms**

**7.222** The Building Regulations relevant to the accessibility of new-build student housing are in Approved Document M: access to and use of buildings, volume 2 – buildings other than dwellings. Paragraph 0.16 indicates that purpose-built student living accommodation should be treated as hotel / motel accommodation in relation to space requirements and internal facilities, as set out in paragraphs 4.17 to 4.24 of Approved Document M: volume 2. These include a requirement for at least 5% of bedrooms to be wheelchair accessible. Drawings accompanying planning applications should demonstrate compliance with these standards.

### **Flat layouts**

**7.223** Applicants should seek a range of flat layouts in student accommodation wherever practical and appropriate. Providing a range of layouts including “cluster-flats” (small clusters of study-bedrooms with a shared facilities such as kitchen-diners) can help to make them attractive to students who would otherwise share private rented accommodation, enhance social interaction, add lower cost rent options and help to meet the needs of the student body as a whole. Our supplementary planning document Camden Planning Guidance on Student Housing sets out further guidance on the expectations regarding flat layouts.

### **The institutions to be served**

**7.224** London’s publicly funded universities are part of the national and regional education infrastructure, support London’s role as an international centre of academic excellence, and are a key part of the growing knowledge-based economy. Linking student housing to publicly funded universities is a straightforward way for the provider and the Council to ensure that accommodation is only offered to genuine students registered for an academic course of study. Where new student housing is proposed the Council will negotiate planning obligations to ensure that the term-time occupiers are students at one or more recognised institutions. These will generally be Higher Education institutions funded by the Office for Students (OfS), which regulates higher education providers on behalf of all students and distributes government higher education funding. They will also generally be Higher Education Institutions with a base in Camden or an adjoining London borough as explained under the heading impact on the transport network.

**7.225** There are a number of other colleges in the borough that help to support London’s international academic reputation. In some instances the Council may support development of student housing by these colleges. Further information about how proposals will be considered is provided in our supplementary planning document Camden Planning Guidance on Student Housing.

## Impact on the transport network

- 7.226** Student housing should serve institutions that are within walking, wheeling or cycling distance, or accessible by public transport. Student housing that is remote from the institution that it serves can have a significant impact on a public transport route or service connecting the two sites. Adverse impacts can arise where student housing serves institutions beyond the borough and its neighbours, or where development outside the South Camden sub-area serves the cluster of universities in Bloomsbury and the Central Activities Zone.
- 7.227** To ensure that occupiers of student housing have good access to their place of study, we will generally negotiate planning obligations to ensure that the term-time occupiers are students attending institutions with a base in Camden or an adjoining borough. We may also consider institutions in other locations where the transport links to the proposed accommodation are demonstrably capable of supporting sustainable travel choices. Public transport and other services that will support new student housing should have existing or committed capacity to accommodate the demand generated by the development. Funding towards services may be sought through planning obligations as appropriate.
- 7.228** The Council will expect student accommodation to be designed to comply with the transport policies in this Local Plan. A wide variety of requirements and tools will be applied to ensure that development supports sustainable transport choices, including cycle parking standards, car-free agreements, Travel Plans and Construction Management Plans.
- 7.229** A Transport Statement or Assessment and a Travel Plan may be required for student housing developments. Camden Planning Guidance on Transport provides two sets of thresholds (based on the size of development) that indicate whether a Transport Statement or Assessment is required, and whether a Local or Strategic Travel Plan is required. For the purpose of the thresholds, one student bedroom will be treated as equivalent to one residential dwelling (in Use Class C3).
- 7.230** A Construction Management Plan (CMP) will also be required for developments involving significant impacts on the public highway or significant excavation. 'Monitoring and measures' financial contributions are required for Travel Plans and CMPs. Transport Assessments and Travel Plans should take account of any proposed alternative uses of the student housing outside term time.
- 7.231** A financial contribution to walking, wheeling, cycling and public realm improvements will be sought if mitigation measures are required to overcome the impact of the development. A financial contribution to highway works will be sought to repair any construction damage to transport infrastructure and reinstate all affected transport network links and road and footway surfaces.

## Affordability and range of accommodation

- 7.232** The Council considers that designated student housing can help limit pressure on the wider private rented market, but to do so the rooms will need to be available at a rate that is competitive with the wider market. To ensure that a proportion of student housing is available at competitive rates, we will:
- expect student housing developments to include a range of flat layouts (as detailed in the earlier paragraphs of this section), wherever this is practical and

- appropriate having regard to any constraints on the site or the development and any specific characteristics of the proposed occupiers; and
- require management of the student housing as a single planning unit (which means being managed by a single body or operator), and prevent disposal of individual rooms or flats as independent self-contained homes; and
  - in accordance with the provisions of the London Plan, expect undertakings with one or more education institutions to tie occupation to students attending the specified education institutions; and
  - seek to secure the maximum level of accommodation as affordable student accommodation in accordance with the distinctive London Plan provisions for purpose-built student accommodation, but as an alternative strongly encourage the contribution of on-site affordable housing in accordance with the guideline mix set out in Policy H4 where feasible, having regard to whether developments are able to include separate blocks and / or stair / lift cores.

## **Creating a mixed, inclusive and sustainable community**

**7.233** The creation of mixed, inclusive and sustainable communities can be a particular consideration where student housing is proposed, especially given the high concentrations of such accommodation in some parts of Camden. Students are sometimes perceived as short-term residents with little connection to the established community. Specific concerns can include noise disturbance, overcrowding on public transport, or the loss of shops and services that meet the needs of longer term residents. The Council will therefore assess proposals for student housing having regard to any existing concentrations in the area, and the wider housing mix in the community. Where the scale or concentration of student housing proposed is likely to harm the balance and sustainability of the community or otherwise harm local amenity, the Council will seek a range of mitigating measures such as management plans, and will resist proposals where mitigation is not possible.

### **Student management plan**

**7.234** Applications for development of student housing will be subject to a Student Management Plan, and a Non-student Management Plan where alternative uses are proposed outside term-time.

**7.235** We require a draft Student Management Plan to be submitted with any planning application for student housing to ensure the health, wellbeing and welfare of students and to mitigate any potential impacts of the development on neighbours and the local community. The Student Management Plan should act as a code of conduct that the provider will abide by in managing the student housing. Where an alternative use of the student housing is proposed outside term time, the applicant should also submit a draft Non-student Management Plan with any planning application to mitigate any potential impacts of the non-student use on other occupiers of the development, neighbours and the surrounding area. This should include similar provisions to the Student Management Plan insofar as the provisions are also relevant to the non-student use.

**7.236** Further guidance on what is expected to be detailed in a Student and Non-student Management Plan is set out in Camden Planning Guidance on Student Housing.

**7.237** The Council will use planning obligations to secure Student Management Plans for all student housing developments, and Non-student Management Plans where relevant. Generally, the draft management plans will be appended to the planning obligations, and the Council will require submission of the finalised management plans for approval by the Council prior to the occupation of the development. The Council will also require the development to be managed in accordance with the approved management plans at all times.

### **Protecting existing student accommodation**

**7.238** Given the potential for pressure on the wider private rented stock, the Council will seek to protect existing student housing, including housing managed by education institutions and independent providers, unless it is replaced or there is no longer a demand for it. Where the loss of student housing is justified to the Council's satisfaction, alternative development should provide an equivalent floorspace in another permanent housing use in accordance with Policy H3 - Protecting existing homes.

**7.239** Where it is demonstrated that existing student housing is no longer required, development of student accommodation could potentially provide an alternative form of shared accommodation for long-term occupation and / or provide self-contained housing, provided that in each case all relevant Local Plan policies are satisfied. In all cases we will expect an appropriate contribution to affordable housing in accordance with Policy H4 - Maximising the supply of affordable housing.

**7.240** Within Camden there is a modest supply of housing with shared facilities which is available to young people and visitors on a short or longer-term basis, usually run by charities and religious institutions. Such housing can be a valuable resource for students arriving in London for the first time, and in some cases is largely occupied by students. However, where this housing is not managed by an education institution or restricted to occupation by students during term-time, the Council will assess proposals involving its loss on the basis of Policy H10 - Housing with shared facilities ('houses in multiple occupation') rather than Policy H9.

### **Housing with shared facilities ('houses in multiple occupation')**

**7.241** A house with shared facilities, or a house in multiple occupation, generally refers to a flat or house that is the main residence for three or more occupiers forming two or more households and who share a kitchen, bathroom, or toilet. A household is generally a family (or people with relationships equivalent to a family). The properties covered by this policy mostly take the form of homes let to a group of friends, homes let room-by-room to unrelated individuals, or properties formally divided into bedsits, but also include other types of accommodation where facilities are shared if the occupiers live there long-term (e.g. hostels for migrant workers).

**7.242** Policy H10 specifically relates to types of housing such as:

- houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and/or facilities (small houses in



multiple occupation or HMOs, Use Class C4) – although different policies apply in different circumstances as set out in the supporting text below;

- houses or flats shared by more than six occupiers who do not live as a family but are long-term residents sharing some rooms and / or facilities (large houses in multiple occupation or HMOs, outside any planning use class); and
- other accommodation with shared facilities where people live long-term (outside any planning use class), often designated for particular groups, but excluding designated student housing and housing for older people, homeless people and other people with care or support requirements.

**7.243** Other policies contain specific provisions for some kinds of housing with shared facilities:

- key-worker accommodation such as nurses' homes and hostels is considered in Policies H4 and H5;
- housing for older people, homeless people and other people with care or support requirements is considered in Policy H8;
- student housing is considered in Policy H9;
- self-contained houses and flats occupied by a single household are considered in Policies H2, H3, H4, H6 and H7; and
- provisions for hotels, serviced apartments and hostels aimed at tourists and backpackers are considered in Policy IE5.

**7.244** For most purposes the Council will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3) to reflect the freedom provided in legislation for changes between these two uses without a planning application. However, where new small homes in multiple occupation are proposed to create a long-term addition to the supply of low-cost housing, the Council will consider using planning conditions to remove the freedom to change to self-contained homes without an application. Where the freedom to change from Use Class C4 to Use Class C3 has been removed (e.g. by a planning condition) the Council will apply Policy H10 and resist the loss of small houses in multiple occupation.

**7.245** The preceding paragraphs should not be regarded as providing detailed definitions or accounts of the legal position. Planning use classes are set out in The Town and Country Planning (Use Classes) Order 1987 (as amended). Provisions relating to licensing of some types of housing are set out in the Housing Act 2004 and related secondary legislation.

## **Policy H10 – Housing with shared facilities ('houses in multiple occupation')**

- A.** The Council will aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with limited incomes and modest space requirements.
- B.** The Council will support development of housing with shared facilities (houses in multiple occupation) provided that the development:
- i. will not involve the loss of self-contained homes;
  - ii. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it is shown that the site is no longer developable for self-contained housing;

- iii. complies with any relevant standards for houses in multiple occupation;
- iv. contributes to creating a mixed, inclusive and sustainable community;
- v. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity; and
- vi. provides an appropriate contribution to affordable housing, having regard to Policy H4 - Maximising the supply of affordable housing.

- C. The Council will resist development that involves the net loss of housing with shared facilities (houses in multiple occupation) or the self-containment of any part of such a housing unless either:
- i. it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities; or
  - ii. adequate replacement housing with shared facilities will be provided that satisfies criteria B (i) to (vi) above; or
  - iii. the development provides self-contained low-cost rented homes (Social Rent or London Affordable Rent); or
  - iv. the development converts the existing accommodation to provide at least one 3-bedroom home.
- D. Where the Council is satisfied that a development involving the net loss of homes with shared facilities is justified, we will expect it to create an equivalent amount of floorspace for permanent self-contained housing (in Use Class C3), including an appropriate contribution to affordable housing, having regard to Policy H4.
- E. Where development of large-scale purpose-built shared living is proposed, the development will be required to comply with relevant London Plan provisions and relevant Local Plan provisions as appropriate.

### **Additional housing with shared facilities**

**7.246** Given that planning legislation provides freedom for changes in either direction between self-contained homes in Use Class C3 and small houses in multiple occupation in Use Class C4, the sectors have scope to expand and contract in accordance with relative demand. Consequently, aside from housing designated for particular groups (such as students and older people), the Council does not currently anticipate a significant number of proposals for development creating new homes with shared facilities. Nevertheless, given the rapid growth of the private rented sector in the borough there is certainly potential for new types of shared accommodation to emerge, such as purpose-built shared living (accommodation similar in character to student housing but available to a wider range of occupiers). Consequently, Policy H10 provides criteria for assessing such proposals. Further details will be provided in our supplementary planning document Camden Planning Guidance on housing as appropriate.

**7.247** Policy H1 indicates that self-contained housing is the priority land-use of the Plan, while Policy H3 resists proposals involving the net loss of self-contained homes. Given this priority, the Council will resist proposals for houses in multiple occupation which involve the loss of self-contained homes, or the development of a site allocated for self-contained homes. The Council will also resist proposals involving the development of a site that has an existing consent for self-contained housing where the consented scheme would better meet Camden's housing needs

and there is a reasonable prospect of the consent being implemented. With the exception of student housing, there is no recent history in Camden of significant new build development for homes with shared facilities, and no reason to suppose that it will prejudice the Council's ability to meet our target for additional self-contained homes.

- 7.248** In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation and other homes with shared facilities. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. The Council will resist proposals that fail to comply with the relevant minimum standards. These standards can be found on the Council's website.
- 7.249** The Council will consider whether proposals could reduce mix, inclusivity, and sustainability of a neighbourhood, for example whether large-scale accommodation or additions to an existing concentration could skew the population towards particular groups or lifestyles. The Council will also consider the potential for harm to nearby residential amenity, for example from residents congregating in outside areas close to other homes. Where appropriate we will seek a planning obligation to protect amenity, for example by securing a management plan through planning conditions or legal agreement.
- 7.250** The Council's priority land-use is self-contained housing, which is generally required to provide affordable housing. Policy H10 therefore seeks to ensure that financial viability is not tilted towards development of housing with shared facilities by seeking a contribution to affordable housing in accordance with Local Plan Policy - H4 Maximising the supply of affordable housing, taking account of the additional residential floorspace proposed and its capacity for self-contained homes. The Council does not generally provide affordable housing in the form of housing with shared facilities. Where it is not possible to include self-contained affordable housing within the development or on an alternative site, the contribution is expected to take the form of a payment in lieu. We support continued provision of housing with shared facilities for people with low incomes, and where proposals are intended for low-income occupiers, as an alternative to a payment-in-lieu of affordable housing, the Council may negotiate planning obligations to ensure that housing is available to low-income occupiers in the long-term where clear management and enforcement mechanisms can be secured.
- 7.251** New forms of housing with shared facilities (such as purpose-built shared living) are emerging that provide high density Inner London living for relatively wealthy young people, sometimes with facilities such as gyms, swimming pools and restaurants. Where proposals come forward that qualify as large-scale purpose-built shared living under the terms of the London Plan, we will consider them in accordance with the Policy H10 Part E.

### **Existing housing with shared facilities**

- 7.252** The Council protects housing with shared facilities because many individuals and couples in Camden would be unable to access or afford anything else. Camden's Housing Needs Update 2021-39 suggests that around half of the projected household growth in Camden over the period will be multi-person households,

including unrelated adults sharing, students, multi-family households and households of one family and other unrelated adults.

- 7.253** Developments leading to a loss of housing with shared facilities have tended to involve either self-containing the existing bedsits (putting pressure on internal space by adding facilities for personal use), converting the property into larger flats, or creating a single large dwelling for one household. Self-containing bedsits reduces the amount of accommodation available to single people and couples with the lowest incomes. Self-containment also tends to involve the loss of access to previously shared spaces, such as kitchens, sitting rooms, gardens, laundries and drying areas, and bathrooms containing a bath. However, a self-contained bedsit itself is rarely large enough to contain a full range of facilities, or to provide space to socialise with visitors.
- 7.254** Converting a home with shared facilities into a single large dwelling or a number of flats larger than the existing bedsits would reduce the amount of accommodation available to small households on low incomes in the borough and would also be likely to reduce the number of people occupying the property. However, we may support conversions that create three-bedroom self-contained flats to augment the limited supply of family housing within the existing stock, as set out in the final paragraph of this section.
- 7.255** The Council is actively working to improve the quality of accommodation in the private rented sector, particularly houses in multiple occupation. Where such properties do not meet current standards, are in serious disrepair, or have a history of vacancy, the Council will assess the form of renovation or development best able to provide residential accommodation of reasonable quality and may accept self-containment in some circumstances. The Council will consider the extent of the works required to meet contemporary standards, their likely impact on any designated heritage assets, the cost of restoring the property to use (having regard to any fixtures and fittings removed from the property by the owner), the potential rental return from the property, and the prospect of investment coming forward to make the property suitable for occupation as housing with shared facilities. Where there is a long history of vacancy, the Council may agree arrangements that secure the availability of some or all of the property for homeless people for a fixed period. Where no such arrangement is agreed, we will seek an appropriate contribution to affordable housing in accordance with Policy H4 - Maximising the supply of affordable housing.
- 7.256** Proposals to replace existing bedsit accommodation, or other housing with shared facilities, usually involve relocating it into an existing self-contained dwelling, and converting the shared accommodation into one or more larger self-contained homes. Such swaps can help a developer or owner to meet a demand for self-contained accommodation in a particular location, provide bedsits in a property that can more easily meet contemporary standards, and / or maximise the value of properties in their control. The Council will not resist such swaps as long as the replacement bedsits are in an appropriate location, represent equivalent or better accommodation (in terms of the number of bedsits, the floorspace, and the standard of facilities and amenities), and are secured by a planning obligation.
- 7.257** There is a small stock of social rented housing in the borough that takes the form of bedsit rooms with communal facilities. Small homes are over-represented in

this sector, and bedsits are unpopular with tenants, especially since they will be sharing facilities with people they do not know, and this may include people with care or support requirements or with challenging behaviour. The Council therefore supports development or remodelling of social rented accommodation with shared facilities to create self-contained low-cost rented homes, subject to the self-contained homes meeting appropriate space standards.

**7.258** In some cases, properties in Camden have been subdivided into flats that are not self-contained because the layout of entrance halls and staircases made self-containment difficult or costly. Where these properties are not let out as bedsits and only share circulation spaces, they do not form housing with shared facilities, and the Council will not resist proposals to convert them into wholly self-contained flats provided that they are able create homes of a reasonable layout and quality. Where such proposals would result in a loss of homes, they will be considered against Policy H3.

**7.259** Camden's Housing Needs Update 2021-39 suggests that based on current trends there is likely to be a small but significant number of households that need 3- or 4-bedroom homes and have earnings above £60,000 per year but will be unable to afford market homes to rent or buy. In addition, the Housing Needs Update indicates that there will be a modest over-supply of market 4-bedroom homes over the period, and that new-build housing is generally more expensive than existing housing. Consequently, the Council will aim to augment the limited supply of family housing within the existing stock by supporting development that involves the net loss of housing with shared facilities (houses in multiple occupation) where this involves a conversion providing at least one 3-bedroom market home. Any resulting 3-bedroom homes should have access to external amenity space where possible to support families with children. In the case of such conversions, the Council will particularly expect an appropriate contribution to affordable housing in accordance with Policy H4 - Maximising the supply of affordable housing.

### **Large-scale purpose-built shared living developments**

**7.260** Large-scale shared living developments may provide an attractive alternative to flat shares and houses in multiple occupation (which are typically found in older housing stock) student housing for single person households. This London Plan includes specific policy provisions for type of accommodation involving at least 50 units (usually small studio flats) and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service. There is currently no history of developments of this type in the borough. The Council will expect proposals for large-scale purpose-built shared living developments to comply with the relevant London Plan policy, while having regard to relevant Local Plan policies, including criteria (i) to (v) in Part B of Policy H10 and Part D of Policy H4.

## **Accommodation for travellers**

**7.261** For planning purposes, the government's 'Planning policy for traveller sites' (revised August 2015) sets out definitions of travellers, gypsies and travellers, and travelling showpeople. In summary:

- 'Travellers' means 'travelling showpeople' and 'gypsies and travellers';
- 'Travelling showpeople' are members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such);
- 'Gypsies and travellers' are other persons of nomadic habit of life whatever their race or origin;
- in all cases, people are still included if they have ceased to travel temporarily, for example due to health or education needs.

**7.262** The Council has a responsibility through national planning policy to assess and plan for the housing needs of all residents, including the gypsy and traveller community. There is an established community of travellers in Camden that has lived in the borough for over thirty years, and which we recognise has longstanding connections with local social networks and services. The Council currently provides four traveller pitches (three at Carol Street and one at Castlehaven Road). There is also a private site for travelling showpeople (the North Fairground Site at the Vale of Health).

**7.263** The Council's approach to meeting the housing needs of travellers in Camden is set out in Policy H11 below.

## **Policy H11 – Accommodation for Travellers**

- A.** The Council will aim to secure a sufficient supply of pitches/ plots to meet the existing and future needs of Camden's established traveller community.
- B.** We will protect existing lawful sites, plots and pitches for travellers and travelling showpeople. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, pitches and/or plots in suitable locations, or are demonstrably no longer needed.
- C.** We will identify sites to meet Camden's projected need for sixteen additional pitches for the established traveller community by 2030/2031.
- D.** The Council will require new sites, pitches and/or plots for travellers to:
  - i.** be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
  - ii.** be capable of connection to energy, water and sewage infrastructure;
  - iii.** provide safe access to and from the main road network;
  - iv.** support the health and wellbeing of occupiers;
  - v.** provide an appropriate layout and facilities;
  - vi.** provide a good level of residential amenity;
  - vii.** be attractive and of the highest design quality; and
  - viii.** protect local amenity and the environment.

### **Assessing needs**

**7.264** The Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014 (the Accommodation Assessment) indicated that 16 additional pitches will be required for Camden's established traveller community by 2031. This is made up of households on the waiting list for pitches and the anticipated growth in the number of households from 2013 to 2031. Households on the

waiting list include a number of households who currently live on an overcrowded site and do not have their own pitch, and a number of households who currently live in bricks and mortar homes.

- 7.265** Since the Accommodation Assessment was undertaken the government's 'Planning policy for traveller sites' has been revised, meaning that the Assessment is not fully consistent with all aspects of the policy.
- 7.266** The London Plan 2021 indicates that boroughs should update their gypsy and traveller accommodation needs assessments as part of the Local Plan review process. The Council is aware that the GLA are currently carrying out a London wide Gypsy and Traveller Accommodation Assessment. This work will provide an updated needs assessment for Camden and is due to be published in the Spring of 2024. The Plan will be updated to reflect the findings of this work moving forward.
- 7.267** In the interim, the Plan uses the identified need for additional pitches from the 2014 Accommodation Assessment, as set out above.
- 7.268** The Accommodation Assessment also considered the need for transit sites (sites for travellers who are visiting or passing through an area) and the needs of travelling showpeople. The Accommodation Assessment concluded that there was no evidence of major travelling routes through Camden that would generate any need for a transit site and that there is no evident need for additional plots for travelling show people.

### **Meeting the need**

- 7.269** To comply with the government's 'Planning policy for traveller sites', the Council should identify a supply of specific deliverable sites to meet needs for the first five years of the Plan period. (Deliverable sites are suitably located, available now, viable to develop, and have a realistic prospect of delivery within five years.) The Council should also identify a supply of specific developable sites or broad locations for growth for the subsequent 5-10 years. (Developable sites are suitably located and have a reasonable prospect of being available and viable to develop at the time envisaged.)
- 7.270** The Council has commissioned consultants to undertake a Gypsy and Traveller Site Identification Study. The purpose of this work is to conduct a review of Council owned land to identify a site, or sites, that are suitable for allocation to meet the accommodation needs of the traveller community in Camden. The strategy for meeting the needs of travellers set out in this Plan will be updated once the findings of this study are known.

### **Assessing proposals**

- 7.271** We will aim to ensure that new sites / pitches are both adequate and appropriate to the needs of the traveller community and integrated with adjoining communities. All proposals for sites, plots and pitches for travellers and travelling showpeople, whether identified by the Council or proposed independently, should meet the criteria set out in Policy H11 and the requirements of the government's 'Planning policy for traveller sites'. Proposals will also be expected to satisfy all other relevant Local Plan policies, including those relating to the impact of development and the protection of green infrastructure.

# Responding to Climate Change





# Chapter 8: Responding to climate change

- 8.1** The Climate Change Act 2008 (as amended) sets a legally binding target for the UK to bring all greenhouse gas emissions to net zero by 2050. The Council declared a Climate and Ecological Emergency in 2019, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems, and set out its commitment to becoming net zero by 2030. The Council's Climate Action Plan, published in 2020, sets out a number of actions to help achieve this.
- 8.2** We Make Camden emphasises the need to adapt to meet the climate challenge that faces us, address the causes of the climate emergency and work towards becoming net-zero, while ensuring that we are supporting and protecting members of our communities from the impacts of climate change.
- 8.3** The Local Plan is a key mechanism for addressing the climate and ecological emergency and delivering the actions identified in the Council's Climate Action Plan and We Make Camden. Furthermore, the National Planning Policy Framework (NPPF) requires Local Plans to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
- 8.4** Policy CC1 sets out the Council's overarching strategy for addressing climate change and delivering a carbon neutral borough by 2030.

## Policy CC1 - Responding to the climate emergency

- A.** The Council will prioritise the provision of measures to mitigate and adapt to climate change and require all development in Camden to respond to the climate emergency by:
- i.** Supporting the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building;
  - ii.** Prioritising and enabling the repurposing and re-use of existing buildings over demolition;
  - iii.** Following circular economy principles, minimising waste and increasing re-use;
  - iv.** Reducing whole life carbon emissions, by taking a whole life carbon approach, considering both embodied carbon and operational carbon;
  - v.** Being designed and constructed to be net zero carbon in operation;
  - vi.** Utilising low carbon technologies and maximising opportunities for renewable energy generation, and heat networks;
  - vii.** Being designed to be resilient to climate change and meet the highest standards of sustainable design and construction;
  - viii.** Minimising the risk of overheating through design and avoiding reliance on air conditioning;
  - ix.** Improving water efficiency;
  - x.** Minimising and avoiding the risk of flooding from all sources, and incorporating multifunctional Sustainable Urban Drainage Systems (SuDS) to reduce surface water run-off;

- xi. Protecting and enhancing existing green spaces and water sources, enhancing biodiversity, strengthening nature recovery and providing multi-functional green infrastructure; and
- xii. Prioritising sustainable transport.

**8.5** This policy sets out the Council's overarching approach to responding to the climate emergency and should be read in conjunction with the other policies in this chapter, which provide more detailed guidance to applicants on:

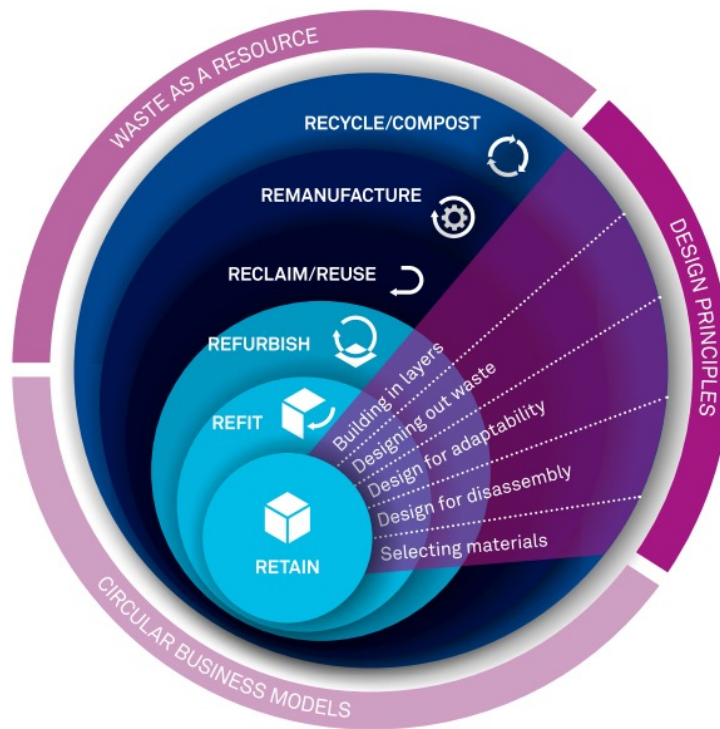
- The re-purposing, refurbishment and re-use of existing buildings;
- Minimising waste and increasing the re-use of resources;
- Energy reduction in new and existing buildings;
- Design for a changing climate; and
- Managing flood risk.

**8.6** To ensure development contributes to tackling climate change a Sustainability Statement will be requested for all planning applications to demonstrate compliance. The detail required will be commensurate with the scale of development proposed and further guidance on this is set out in the policies in this chapter.

## **Minimising waste and increasing the reuse of resources**

**8.7** As the largest consumer of materials in the economy, and a significant generator of waste, air pollution and carbon emissions, the built environment sector must take the lead in supporting the shift towards a circular economy.

**8.8** The London Plan defines a circular economy as one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. London needs to move to a more circular economy in order to save resources, increase the resource efficiency of London's businesses, and help to reduce carbon emissions. To optimise resource efficiency, and facilitate the longer life of buildings, the concept of 'circularity' in building development (as shown in the diagram below) should be integrated from the outset in the project scope.



Source: Building Revolutions (2016), David Cheshire, RIBA Publishing ©

- 8.9** The policies in this section seek to address these issues by bringing the value of existing resources upfront, putting in place measures to reduce waste from the built environment, and ensuring that the lifecycle of a building seeks to minimise carbon emissions as much as possible, from the operation of buildings and from their construction and maintenance.

## Policy CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings

- A.** The Council will seek to ensure that the repurposing, refurbishment and re-use of existing building/s is prioritised over demolition.
- B.** Where sites include existing building/s, applicants will be required to undertake a condition and feasibility assessment, to understand the re-use potential of the existing buildings and explore the best use of the site. This should be undertaken at the earliest opportunity, as part of the design process.
- C.** Taking into account the findings of the condition and feasibility assessment, applicants will be required to demonstrate that alternative development options (such as refit, re-use, refurbish, substantial refurbishment and extension) have been fully explored.
- D.** Applicants should discuss the findings of the condition and feasibility assessment and the assessment of alternative development options (as set out in criteria B and C above) with the Council, at the earliest opportunity, before progressing the design of any scheme.

- E.** The Council will only permit proposals that involve the partial or substantial demolition of existing building/s, where it can be demonstrated to the Council's satisfaction that:
- i.** The applicant has comprehensively explored a range of alternative development options, informed by the condition and feasibility assessment, prior to considering full or partial demolition.
  - ii.** The proposal constitutes the best use of the site, when considered against alternative options involving the retention, repurposing, refurbishment and/or re-use of the existing building/s.
- F.** Where it is demonstrated to the Council's satisfaction that the partial or full demolition of existing building/s is justified, the applicant will be required to submit a pre-demolition audit. This should demonstrate that the re-use of materials has been explored on site; identify all materials within the building and document how they will be managed; show how building material waste will be minimised; and demonstrate that circular economy principles have been applied in accordance with Policy CC3 Circular Economy and Reduction of Waste.

- 8.10** The development industry needs to move away from the traditional practices of extraction of virgin materials, manufacture, construction, and disposal, to approaches which intend to keep buildings, materials, and components in use as close to their original form as possible.
- 8.11** Repurposing a building through refurbishment and change of use, including extensions to increase floor area, can offer many benefits, saving money, saving time and conserving resources. There can also be associated benefits from retaining and refurbishing secondary employment space, by ensuring access to suitable accommodation for small and medium enterprises and specialist clusters, such as creative industries.
- 8.12** Developers must explore the repurposing, refurbishment, and reuse of buildings as the priority option, over demolition. Where sites include existing buildings a condition and feasibility assessment should be undertaken, at the earliest opportunity, to understand the reuse potential of the building/s. The condition and feasibility assessment should include:
- A review of how the building is (or has been) used and functions;
  - Servicing information;
  - A Technical building survey;
  - A review of optimal site capacity (in accordance with London Plan policy D3 Optimising site capacity through the design led approach).
- 8.13** Applicants will be expected to use the findings of the condition and feasibility assessment to inform the consideration of development options for the site. Here, applicants will be required to demonstrate that options such as refit, re-use, refurbish, substantial refurbishment and extension have been fully explored. This will require the submission of appropriate detailed drawings where appropriate. As part of the consideration of development options, applicants should explore alternative uses for existing buildings, where it is demonstrated that the established use is no longer suitable, and the alternative use is compliant with other Local Plan policies.

- 8.14** Applicants should discuss the findings of the condition and feasibility assessment and the assessment of alternative development options, with the Council, using Development Management’s pre-application advice service, at the earliest opportunity, before progressing the design of any scheme.
- 8.15** The Council will only permit proposals that involve the partial or substantial demolition of existing building/s, where it can be demonstrated to the Council’s satisfaction that:
- The applicant has comprehensively explored a range of alternative development options, informed by the condition and feasibility assessment, prior to considering full or partial demolition.
  - The proposal constitutes the best use of the site, when considered against alternative options involving the retention, repurposing, refurbishment and/or re-use of the existing building/s.
- 8.16** Where it is demonstrated to the Council’s satisfaction that repurposing, refurbishment, or reuse options are not feasible, we will expect the replacement building to meet, or exceed the targets set out in this plan for:
- energy reduction;
  - reductions in embodied carbon, and using reclaimed materials where feasible;
  - general comfort, without the need for active heating and cooling systems;
  - flexible building design, using circular economy principles;
  - sustainable drainage; and
  - greening, and biodiversity enhancements.
- 8.17** Where a case for demolition is not justified to the Council’s satisfaction, we may require an independent assessment be paid for by the developer.
- 8.18** Development proposals that involve demolition must include a pre-demolition audit to identify all materials within the building and document how they will be managed. This is to aid the implementation of careful demolition strategies, the segregating of materials and analysis to maximise opportunities of reuse and reclamation. A post completion demolition and waste audit will also be requested.

## **Policy CC3 - Circular economy and reduction of waste**

- A.** The Council will seek to ensure that developments minimise waste, use resources efficiently, and are designed to facilitate easy maintenance and adaptability of use. The Council will:
- i.** Require all developments to optimise resource efficiency by:
    - a.** Reducing waste through the application of the waste hierarchy (Prevention, Preparing for reuse, Recycling, Other recovery, Disposal);
    - b.** Reducing energy and water use during demolition and construction, whilst effectively mitigating air quality impacts;
    - c.** Minimising the amount of materials required;
    - d.** Using materials with low embodied carbon content; and
    - e.** Enabling low energy and water demands once the building is in use.
  - ii.** Require all developments to be designed for:
    - a.** easy maintenance and renovation;
    - b.** flexibility and adaptation; and
    - c.** longer life and facilitating deconstruction for future re-use.

- iii. Require applicants to submit a Sustainability Statement with all applications documenting how the requirements set out in criteria (i) and (ii) have been met.
- iv. Require new build major applications, or major applications which involve substantial demolition and rebuild, to submit a Circular Economy (CE) Statement, following GLA guidance. The following details must be included in the CE Statement:
  - a. an accurate record of all the materials used in the building's construction;
  - b. the proportion of materials and elements reused on-site;
  - c. materials reused from other sites;
  - d. recycled materials;
  - e. new materials by mass and material intensity (kg per m<sup>2</sup>); and
  - f. a calculation of the development's overall 'material circularity'.
- v. Require applicants needing to submit a Circular Economy Statement (as set out in criteria (iv) above) to explore opportunities to use the site, or other local sites, for the temporary storage of re-usable materials, during the construction phase, to enable other developments coming forward in the locality to use those materials.
- vi. Safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site.

- 8.19** The NLA Circular London report states that reusing elements of a building in as near to the original form as possible is the best option if a building or part of a building is to be demolished. It also notes that the most important or valuable materials to reuse are those which make up the buildings frame (50 to 60% embodied carbon).
- 8.20** In design, taking a circular economy approach, is about providing a flexible and adaptable space, with current needs balanced with future possible requirements, so that the building can be easily reconfigured, and maintained, as technologies and the needs of the users change. The structure and interior systems should also be designed for simple disassembly when parts of the building may need to be altered. Modular designs and standard elements will minimise waste by making their reuse easier.
- 8.21** The London Plan Circular Economy Statement puts circularity at the heart of designing development in London, in treating building materials as resources (not waste) and ensuring new development can be easily maintained, adapted, and dismantled over its lifetime. Major new development and major development including substantial demolition in Camden (for example where more than half of the existing structure/s are demolished) will be required to submit a Circular Economy Statement following the GLA Circular Economy template.
- 8.22** The London Plan sets a target to meet or exceed 95% construction and demolition waste from landfill. The North London Waste Plan Annual Monitoring Report 2023 shows that this target has not been met over the period from 2016 to 2020. The target for waste reduction does not indicate whether materials are being used at their highest possible value in accordance with the waste hierarchy. To ensure development is taking a circular approach in material / resource use the Council will require applicants submitting a CE Statement to undertake an assessment to demonstrate this. The inputs required to undertake this assessment are outlined below.

- 8.23** The result is a percentage from 0 to 100 where 100% would be retaining all materials and 0% would be completely new materials. This visible figure should incentivise applicants to adopt resource efficiency principles to keep materials in use as close to their original form as possible, over using a larger proportion of new materials where this is feasible.

## Policy CC4 - Minimising carbon emissions

- A.** The Council will seek to ensure that all development minimises carbon emissions over the lifespan of the building(s). The Council will:
- i.** Require applicants for all new build development and all development proposing substantial demolition to:
    - a.** submit a whole life carbon emissions assessment (including operational and embodied carbon), following the GLA Whole Life Cycle Carbon Assessment template, as part of the planning application; and
    - b.** demonstrate that they have done all they can to minimise carbon emissions over the lifespan of the building/s, targeting the GLA Whole Life Carbon aspirational benchmarks in modules B – C.
  - ii.** Require new build developments to meet embodied carbon limits of less than 500kg CO<sub>2</sub>/m<sup>2</sup> for residential, and less than 600kg CO<sub>2</sub>/m<sup>2</sup> for non-residential.
  - iii.** Require applicants to demonstrate what action they have taken to reduce embodied carbon in the development, as part of the Energy or Sustainability Statement.

- 8.24** Whole life carbon brings together upfront embodied carbon, operational carbon, and carbon emissions associated with replacement and maintenance. Operational carbon is the emissions associated with energy used to operate the building, including heating, hot water, cooling, ventilation, lighting systems, equipment and lifts. Embodied carbon emissions are associated with materials and construction processes throughout the whole lifecycle of a building. (UK Green Building Council, Operational and Embodied Carbon Explainer Guide)

- 8.25** The GLA has published guidance on undertaking whole life-cycle carbon assessments and provided a template to assist applicants with this. The Council will expect applicants to use the template provided, and follow the guidance issued, when undertaking whole life-cycle carbon assessments for all relevant schemes, as set out in Policy CC4 above. As part of the whole life-cycle carbon assessment applicants will be required to demonstrate that they have done all they can to minimise carbon emissions over the lifespan of the building/s, targeting the GLA Whole Life Carbon aspirational benchmarks in modules B – C of the guidance.

- 8.26** Both operational and embodied carbon must be reduced to address the climate emergency. Operational carbon is more closely monitored in current legislation and policy. There are currently no approved universal standard targets defined for embodied carbon, however, LETI and RIBA targets have been aligned since May 2021, with best-practice performance targets for projects in the design phase considered to be a “C” rating (see Figure 3 below), while a “B” rating is considered a robust stretch target for projects currently in the design phase. (Delivering net zero carbon: An evidence study to support planning policies which deliver net zero carbon developments, Etude et al 2023)

**Figure 3. Targets for embodied carbon in kgCO<sub>2</sub>/m<sup>2</sup>/GIA/yr, stages A1 – A5, excluding sequestration, LETI.**

Band	Office	Residential (6+ storeys)	Education	Retail
A++	<100	<100	<100	<100
A+	<225	<200	<200	<200
A	<350	<300	<300	<300
B	<475	<400	<400	<425
C	<600	<500	<500	<550
D	<775	<675	<625	<700
E	<950	<850	<750	<850
F	<1100	<1000	<875	<1000
G	<1300	<1200	<1100	<1200

**8.27** Applicants will be expected to demonstrate what action they have taken to reduce embodied carbon in the development, as part of the Energy or Sustainability Statement. Consideration of the design of a building at the early stages of a development proposal can reduce embodied carbon, by minimising the quantity used, and waste created, in both in the construction process and methods. Decisions made to reduce embodied carbon, and the level achieved, should be set out in the whole life carbon assessment. Where targets for embodied carbon cannot feasibly be met, a full justification will be required as part of the Whole Life Carbon Assessment.

### Energy: Delivering zero carbon development

**8.28** The Council aims to tackle the causes of climate change in the borough by ensuring that developments use less energy. Any new development in Camden has the potential to increase carbon dioxide emissions in the borough. If we are to deliver the Council’s commitment to be net zero carbon by 2030 it is crucial that we support the retrofitting of existing buildings to make them more energy efficient, require new buildings to be designed and built to be net zero carbon in operation, and support developments to connect to heat networks.

**8.29** The following policies set out the Council’s approach to reducing energy in existing and new buildings with the aim to ensure they contribute towards achieving local and national targets for zero carbon development.

## Policy CC5 - Energy reduction in existing buildings

- A. The Council will support adaptations and improvements to existing buildings to make them more energy efficient and reduce the energy needed to occupy the building. The Council will:
  - i. Require all development proposals for the alteration, extension and/or conversion of an existing building (including where an element of demolition is proposed) to demonstrate how they have considered and will implement



energy efficient improvements. This should be detailed in the Sustainability Statement.

- ii. Expect energy efficient improvements to be made appropriate to the scale or nature of the proposal.
- iii. Expect energy demand in the part of the building being altered/ extended and/ or converted, to primarily be reduced through improvements to the building fabric. These improvements should comply with the U values set out in Table 6 in the supporting text below.
- iv. Require proposals that include the addition or replacement of 500sqm floorspace or more; or developments providing one or more additional dwellings through conversion and / or additional floorspace to:
  - a. reduce the amount of energy required to heat the building/s over a year, as far as possible, to meet a space heating demand of 50 kwh/m2/ year. Proposals within a conservation area or related to a listed building may be provided an additional allowance of 10 - 20 kWh/m2 where it is demonstrated to the Council's satisfaction that the above target of 50 kwh/ m2/year cannot be met;
  - b. be fossil fuel-free, and use low carbon heat;
  - c. demonstrate to the Council's satisfaction that it has maximised the generation of renewable energy on-site (through solar photovoltaics (pv), as far as practical; and
  - d. Submit an energy statement to demonstrate how the proposal complies with the criteria above.
- v. Encourage all other proposals for the alteration, extension and/or conversion of an existing building (not specified in A(iv)) to also meet the standards set out in A(iv) a, b, c and d above.
- vi. Require proposals that include substantial demolition but retain part of the building to use as little energy as possible and meet an Energy Use Intensity target of 50 kWh/m2/year for residential uses. In instances where minimal existing built fabric is retained (i.e. basement; foundations; a façade; small part of the superstructure) the Council will require the development to meet all energy reduction criteria for new buildings set out in Policy CC6.

**8.30** Improving and adapting existing homes and buildings is a key priority for the Council as we strive to meet net zero carbon, and will also help to achieve one of the six We Make Camden ambitions, which is to ensure that Camden has enough decent, safe, warm, and family-friendly housing to support our communities.

**8.31** While a whole house approach to retrofitting is recommended, proposals for existing homes will only be required to include details of the part of the building being altered, extended or converted.

**8.32** When undertaking a retrofit project, the impact of all the proposed retrofit measures should be carefully considered as a whole, with the building's fabric, ventilation and heating characteristics all designed to work in harmony with each other. Applicants are advised to refer to the following guidance for further information –

- LETI Climate Emergency Retrofit Guide
- Historic England - Energy Efficiency and Historic Buildings: How to improve Energy Efficiency
- Net Zero Carbon Toolkit by Etude et al.

- 8.33** All development proposals relating to an existing home or building are required to submit a Sustainability statement showing how energy demand (or potential heat loss) for the proposal will be reduced as far as possible through building fabric (materials), and any additional measures considered as part of a whole building approach. This should also be considered alongside Policy CC8 Overheating and Cooling, which requires all development to address overheating through design and promote natural cooling.
- 8.34** The following paragraphs outline a number of measures that can be undertaken either as part of an extension/ alteration or conversion part, or as part of wider whole house approach to energy reduction. Most of the measures set out below will not need planning permission (even in conservation areas).

## **Implementing energy efficient improvements**

### **Building fabric / materials**

- 8.35** Building alterations, including extensions, should use materials and be constructed to reduce energy demand. This can be achieved using a simple built form, high levels of insulation, draught proofing, reduced thermal bridges (areas such as window and door joinery which allow heat to pass through more easily), and high performance windows.

### **Windows**

- 8.36** Installation of secondary, double or triple glazed windows is supported. Window replacement should seek to match the features and appearance of existing windows or those most closely associated with the historic character of the area.
- 8.37** Planning permission for window replacement is required where they do not match the material, colour, size and design of existing window frames and profile or it relates to a listed building, or building covered by an Article 4 Direction.

### **Insulation**

- 8.38** Insulating walls and roof spaces is one of the best ways of reducing energy consumption in homes. Solid walls have no gap so they cannot be filled with cavity wall insulation. Homes built before the 1920's are likely to have solid walls. Insulation to solid walls can either be installed on the outside walls (external) or on the inside walls (internal). Planning permission is generally not required for external wall insulation for dwelling houses (planning permission is required for flats or homes in a conservation area), providing the materials used match the appearance of the original house.
- 8.39** The Council is supportive of external wall insulation on side and rear walls where they are not predominately visible from the street or wider view. The external wall insulation should be applied without the need to extend roof eaves, ensuring original detailing is reinstated, and the junction with the front elevation is seamless, and the finish matches the material, colour and texture of the existing building, the junctions with adjoining properties and around window and door reveals are sensitively considered.

- 8.40** Internal wall and external wall insulation is unlikely to be acceptable on a listed building due to impact on the fabric of the building and potential problems with the maintenance of original fabric due to moisture build up. Other types of insulation such as floor, and roof insulation are however more likely to be acceptable in listed buildings, but this depends on the nature of the floor and whether air can circulate.
- 8.41** Natural and breathable insulation materials allow for the transfer of moisture to avoid build-up of condensation and rot. It is also important to consider a ventilation strategy to ensure there is not an increased overheating risk or excess moisture build up.

### Solar photovoltaic panels

- 8.42** In most cases roof mounted solar panels do not require planning permission and can be installed provided they:
- Protrude no more than 200mm from the roof slope or wall;
  - Are no higher than the roof line (excluding chimney);
  - Are sited so as to minimise its effect on the external appearance of the building;
  - Are sited so as to minimise its effect on the amenity of the area; and
  - Are removed as soon as reasonably practical when then equipment is no longer needed.
- 8.43** Where solar panels are proposed on listed buildings, buildings covered by an Article 4 Direction which removes permitted development rights for the roof, or go beyond the permitted development conditions set out above then planning permission will be required (if in doubt please contact the planning service).
- 8.44** Where solar panels require planning permission and listed building consent these will be supported provided that they do not harm historic fabric or significance of a heritage asset, when balanced against the wider public benefit of tackling the climate emergency.

### Air source heat pumps

- 8.45** Air source heat pumps operate by absorbing heat from outside air to provide heating. Heat pumps are most efficient in buildings that are well insulated and draught proofed, and have either underfloor or warm air heating as they operate at lower temperatures.
- 8.46** Where air source heat pumps are proposed it is recommended that works to improve the energy efficiency of the building, such as additional insulation and draught proofing, are incorporated. A whole house approach to energy reduction would ensure retrofit improvements work well together. This would also help to ensure that the size and noise impact of the heat pump is reduced as much as possible.
- 8.47** To reduce noise impact further it is advised that the air source heat pump is installed away from neighbouring property. Please also refer to the '[Heat Pumps Professional Advice Note](#)' produced by the Institute of Acoustics and Chartered Institute of Environmental Health.

**8.48** Planning permission is not required for air source heat pumps providing that they meet permitted development criteria (this includes installation complies with the **Microgeneration Certification Scheme planning standards (MC20)** or equivalent). For listed buildings, listed building consent and planning permission is required, and applicants should ensure that equipment is located close to the building to ensure it does not harm its setting.

**Ventilation**

**8.49** Ventilation is important for homes undergoing retrofit measures because improved insulation and airtightness can increase issues with moisture build up. Ventilation can include simply opening windows, to measures such as the fitting of an extractor fan, to fitting a whole house ventilation system such as Mechanical Ventilation with Heat Recovery.

**8.50** Guidance provided by the Good Homes Alliance states that heat recovery mechanical ventilation systems are an important feature of energy efficient homes, significantly reducing heating demand in the winter by recovering heat.

**Reducing energy demand through improvements to the building fabric**

**8.51** Where works are being undertaken to alter/ extend/ convert an existing building the Council will expect energy demand in the part of the building being altered/ extended and/or converted (i.e the new build element), to primarily be reduced through improvements to the building fabric. These improvements should comply with the U values set out in Table 6 below.

**Table 6 – Building material fabric U Value specifications**

<b>Residential Fabric U-values (W/m2 .K)</b>	<b>Non-residential Fabric U-values (W/m2 .K)</b>
Walls 0.13 - 0.15	Walls 0.12 - 0.15
Floor 0.08 - 0.10	Floor 0.10 - 0.12
Roof 0.10 - 0.12	Roof 0.10 - 0.12
Exposed ceilings/floors 0.13 - 0.18	Windows 1.0 (triple glazing) - 1.2 (double glazing)
Windows 0.80 – 1.0 (triple glazing)	Doors 1.2
Doors 1.00	
Include openable windows, cross ventilation, and include external shading	

**8.52** These specifications relate to U-Values contained in the LETI Climate Emergency Design Guide. Buildings in conservation areas or those which are listed may need flexibility, please refer to U-values in LETI Climate Emergency Retrofit Guide.

## Energy reduction in larger schemes

- 8.53** Medium scale developments providing an additional (or replacement) 500sqm or more floorspace, or providing one or more additional dwellings through conversion and / or additional floorspace, must be low energy, use low carbon heat, and generate renewable energy through the use of solar panels.
- 8.54** Proposals will be expected to reduce the amount of energy required to heat the building/s over a year, as far as possible, to meet a space heating demand of 50 kWh/m<sup>2</sup>/year. Proposals within a conservation area or related to a listed building may be provided an additional allowance of 10 - 20 kWh/m<sup>2</sup> where it is demonstrated to the Council's satisfaction that the above target of 50 kWh/m<sup>2</sup>/year cannot be met.
- 8.55** The space heating demand is the amount of heat energy needed to heat a home or building over a year and is expressed in kWh/m<sup>2</sup>/year (see Figure 4). It is a measure of the thermal efficiency of the building elements, rather than the heating system used. The Energy Statement submitted as part of a planning application for a site should model and demonstrate how the space heating demand target of 50 kWh/m<sup>2</sup>/year has been achieved. Proposals in conservation areas or those relating to listed buildings may find a space heating demand target of 50 kWh/m<sup>2</sup>/year for existing buildings challenging, if demonstrated to the Council's satisfaction that this has been reduced as far as possible an additional allowance to meet this policy criteria will be accepted.
- 8.56** For guidance on how to meet the targets set out in this policy applicants should have regard to 'The Low Energy Transformation Initiative Climate Emergency Retrofit Guide' produced by LETI which sets out a suite of measures to guide the retrofit of existing homes to achieve net zero.

## Energy reduction in schemes proposing substantial demolition

- 8.57** Proposals that include substantial demolition but retain part of the building must also use as little energy as possible and meet an Energy Use Intensity (EUI) target of 50 kWh/m<sup>2</sup>/year for residential uses. EUI is a measure of the total energy consumption of the building (kWh/m<sup>2</sup>/year). The EUI of a building covers all energy uses: space heating, domestic hot water, ventilation, lighting, cooking, and appliances (see Figure 5). The Energy Statement submitted as part of a planning application for a site should cover all energy use (regulated and unregulated) and set out how it has been reduced to the levels indicated in the policy, calculated using a methodology proven to accurately predict a building's actual energy performance. Further guidance on retrofit targets for non-residential buildings are expected to be published and the policy will be updated to reflect these.
- 8.58** In addition to this, and in accordance with Policy CC6 below, proposals that include substantial demolition but retain part of the building must also contribute to renewable energy generation. Here, the Council will expect the Energy Statement to confirm: the number and size of solar panels, as well as any tilt; and the expected energy output (this should be expressed in kWh/m<sup>2</sup> and the area covered shown on plan).

## Policy CC6 - Energy reduction in new buildings

- A.** The Council will ensure that all new buildings are designed and built to be net zero carbon in operation. The Council will:
- i.** Require new buildings to be fossil fuel free (that is, not connected to the gas grid, use non-combustion energy systems), ultra-low energy, use low carbon heat, and contribute to the generation of renewable energy on-site.
  - ii.** Require new buildings to use as little energy as possible to heat them. The Council will require all new residential and non-residential buildings to achieve a space heating demand of 15 or less kWh/m<sup>2</sup> GIA/yr.
  - iii.** Require new buildings to use as little (total) energy as possible (expressed as EUI – Energy Use Intensity). For each of the building types set out below (or nearest equivalent), the Council will require development to meet the following standards, unless it is demonstrated to the Council’s satisfaction that it is not technically feasible:
    - a.** Residential buildings must achieve an EUI of no more than 35 kWh/m<sup>2</sup>GIA/yr.
    - b.** Offices, Retail, Higher Education Teaching facilities, GP surgeries must achieve an EUI of no more than 70 kWh/m<sup>2</sup> GIA/year.
    - c.** Student accommodation, care homes, extra care homes must achieve an EUI of no more than 35 kWh/m<sup>2</sup> GIA/year.
    - d.** Hotels must achieve an EUI of no more than 160 kWh/m<sup>2</sup> GIA/year.
    - e.** Light industrial units must achieve an EUI of no more than 35 kWh/m<sup>2</sup> GIA/year.
    - f.** Schools must achieve an EUI of no more than 65 kWh/m<sup>2</sup> GIA/year.
  - iv.** Require renewable energy generation on-site to match, or be in excess of, the predicted total annual energy demand of the building (EUI), in accordance with the following requirements:
    - a.** the proposed building must not use fossil fuels on-site;
    - b.** it must have a level of space heating demand and energy use intensity (EUI) compliant with levels in this policy; and
    - c.** on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m<sup>2</sup> building footprint for all building types (at least 120 kWh/m<sup>2</sup> for industrial buildings).
  - v.** Require a payment in lieu to be made where it can be evidenced to the Council’s satisfaction that it is not technically feasible for the amount of energy generated in a year through onsite renewable energy production to match the predicted annual energy demand of the building. The payment in lieu will be expected to be equivalent to this shortfall.
  - vi.** Require applicants/landowners to monitor the total energy use and renewable energy generation of the development for the first 5 years of occupation and submit the annual figures to the Local Planning Authority.
  - vii.** Require applicants to demonstrate that the development will deliver all the requirements of this policy through the provision of a detailed Energy Statement and through the use of an energy assured performance method.

**8.59** Part L 2021 of the Building Regulations covers the conservation of fuel and power in dwellings (volume 1) and buildings other than dwellings (volume 2). All buildings in England & Wales must comply with Part L 2021 of the Building Regulations and they set a minimum level of performance. However, in order to deliver their climate commitments, local authorities can decide to go further than the Building Regulations and set their own energy and carbon targets.

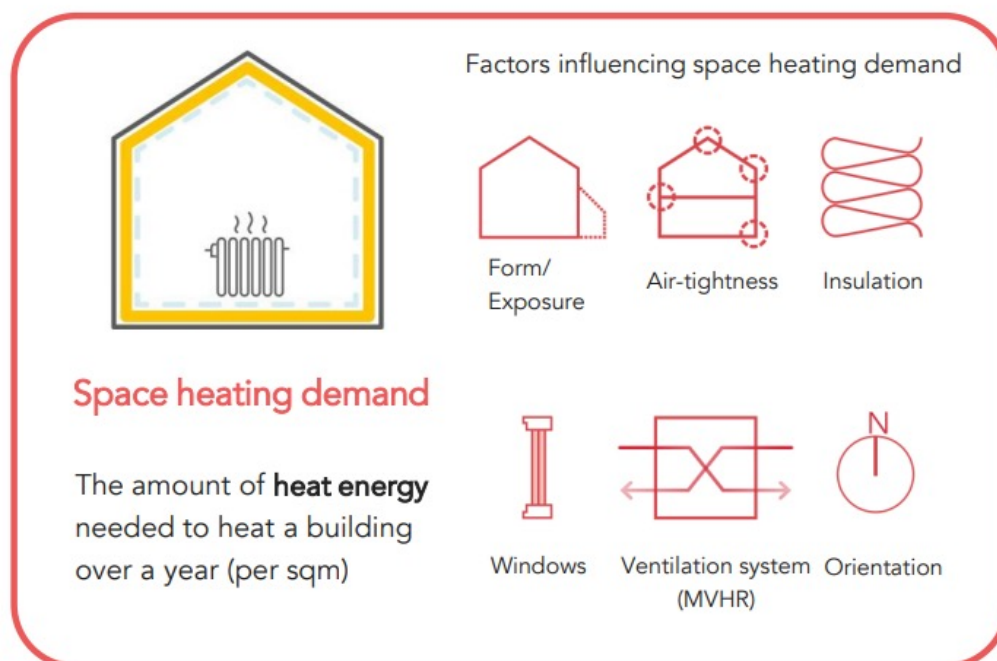
**8.60** To inform the approach to the delivery of net zero carbon developments in the Plan, the Council, along with 17 other London boroughs, commissioned a joint study entitled 'Delivering Net Zero, an evidence study to support planning policies which deliver Net Zero Carbon developments'. The study explored two main policy options for delivering net zero and recommended that London Boroughs adopt a new system focussing on absolute energy-based metrics and predictive energy modelling tools.

**8.61** The policy approach set out above is in line with the recommendations of the study and considers all energy used in the building (except Electric Vehicle charging points) and seeks to achieve a balance between energy use and on-site renewable energy generation, only allowing offsetting to address a potential imbalance.

### Heating demand

**8.62** The space heating demand is the amount of heat energy needed to heat a home or building over a year and is expressed in kWh/m<sup>2</sup>/year. It is a measure of the thermal efficiency of the building elements. The Council will require applicants to submit an Energy Statement as part of a planning application for their site. This should model and demonstrate how the maximum space heating demand target of 15 kWh/m<sup>2</sup>/year or less (as set out in the policy) has been achieved.

**Figure 4. Space heating demand, 'Delivering net zero' Etude et al 2023.**

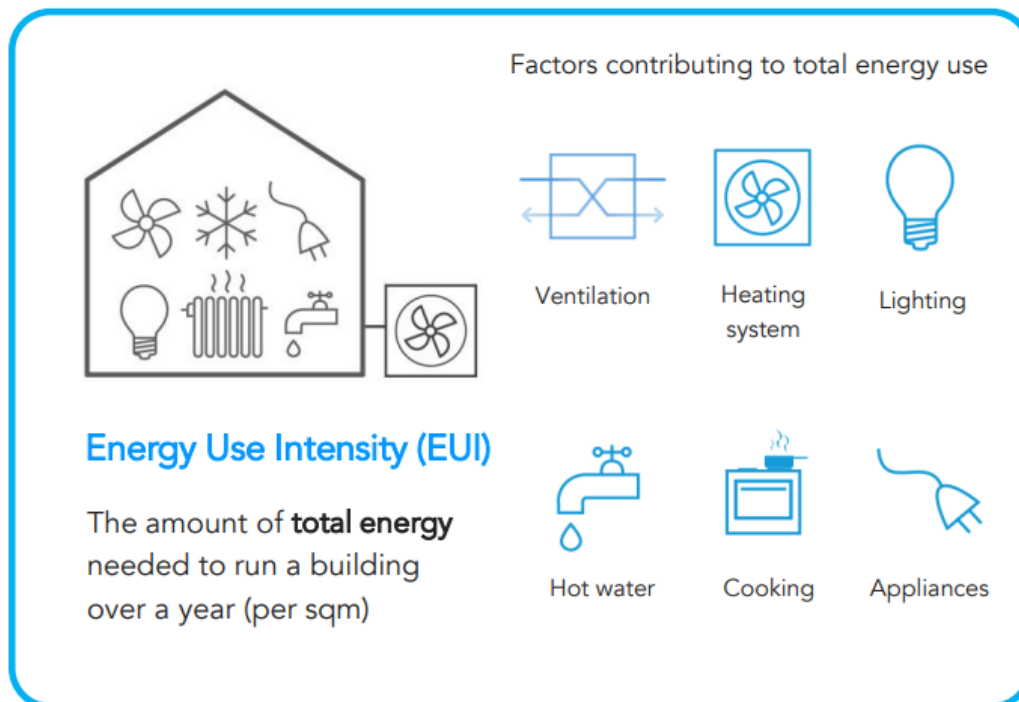


### Total energy use

**8.63** Energy Use Intensity (EUI), or metered energy use, is the total energy needed to run a home over a year (per square metre). It is a measure of the total energy consumption of a building (kWh/m<sup>2</sup>/year). The EUI of a building covers all energy uses: heating, domestic hot water, ventilation, lighting, cooking, and appliances (not including renewable energy generation through solar panels). Not all building

types will fit into the EUI targets in this policy. In such cases the applicant should discuss with the Council what the EUI target for their development should be.

**Figure 5. Energy Use Intensity, 'Delivering net zero' Etude et al 2023**



**8.64** Where it has been demonstrated to the Council's satisfaction that savings have been maximised through energy efficient design; low carbon heat; the generation of renewable energy on-site; and low embodied carbon; the proposal will be considered compliant with the above policy criteria.

**8.65** The Energy Statement submitted with the planning application for the site should include all energy use (regulated and unregulated) and set out how it has been reduced to the levels indicated in the policy, calculated using a methodology proven to accurately predict a building's actual energy performance (energy assured performance method). The preferred modelling approaches are:

- For new build residential schemes - Passive House Planning Package (PHPP). This has been shown to predict energy use much more accurately than Standard Assessment Procedure.
- For new non-residential schemes - CIBSE Technical Memorandum 54 (TM54) predictive energy modelling. IESVE, TAS and PHPP are three energy modelling packages that can be used to carry out TM54 assessments. Predictive energy modelling using CIBSE Technical Memorandum 54 (TM54) allows to estimate the operational energy for all end uses of a building (regulated and unregulated) much more accurately. Any change to this will be detailed in further guidance issued by the Council.

### Renewable energy generation

**8.66** Renewable energy generation on-site must match, or be in excess of, the predicted annual energy demand of the building (EUI). Where a development is unable to achieve the quantity of renewable energy generation on site, as outlined in the



policy, the Council will expect an offset payment, based on the cost of providing that capacity if the space had been available. The offset payment will be secured through a legal agreement.

- 8.67** A high output photovoltaic (solar panel) system with micro-inverters (i.e. £1,016/kWp, Median cost of 10-50kWp PV installations for 2021/22 from MCS (Source: DESNZ)) would give an energy offset price of £1.32/kWh/year - this is assuming a conservative electricity generation rate for the photovoltaic system of 850 kWh/kWp and includes a 10% additional rate for administering and managing the funding process. The pricing scheme may be subject to change however as further local studies are undertaken, and these will be published on Camden's website. Applicants must refer to the Council's latest guidance for energy offset rates which will supersede the rates stated above.

## Monitoring

- 8.68** The London Plan requires major development to report on energy performance for at least five years following the completion of a development, with online guidance and a data reporting spreadsheet available (see London Plan Policy SI2 Minimising greenhouse gas emissions). All new build development will be required to report energy performance for the first five years of occupation.

## Policy CC7 - Heat networks

- A.** The Council will ensure that all major developments utilise energy from heat networks where feasible. The Council will:
- i.** Require all major development to comply with London Plan policy SI3 (Energy infrastructure) and refer to related GLA Energy Assessment guidance for heat networks and utilising secondary heat sources.
  - ii.** Require all major development located within a 500m radius of an energy network to be designed for connection. Where a heat network exists in the vicinity of the proposed development, the applicant must prioritise connection to that network provided that the network operator has agreed a decarbonisation strategy with the GLA and Camden Council.

- 8.69** Heat networks provide heat from a central source close to the consumer. Heat networks and local secondary heat sources will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs (London Plan 2021). The council will require all proposed major development within any identified heat network areas to fully explore opportunities to connect to existing or future planned energy networks.

- 8.70** Existing heat networks in Camden are located in Somers Town, Gower Street, Bloomsbury, Gospel Oak, and King's Cross. These systems have grown around combined heat and power systems (CHP). The carbon savings from these systems has however declined in recent times as a result of the decarbonisation of the national grid and they are also related to adverse air quality impacts. Whilst it is possible to decarbonise existing CHP systems, existing networks in Camden are not yet decarbonised. Major developments should prioritise connections to heat networks where the source of the heat network is sufficiently decarbonised to be considered a renewable energy source.

## Designing for a changing climate

- 8.71** We need to ensure that the environment that we live in can adapt to changes already evident within the climatic system, to prepare for the potential effects of climate change, and mitigate the social, environmental and economic impacts associated with this.
- 8.72** The main risks that we need to adapt to as a borough are flooding, drought and overheating. Given this, a key consideration for the Council will be ensuring that new developments are designed to adapt to these risks.
- 8.73** The following policies set out the Council's approach to designing for a changing climate, and address overheating, water stress, and sustainable design and construction. These policies should be read in conjunction with other policies in this Plan, particularly those which cover managing flood risk (Policies CC11 and CC12), protecting and enhancing the natural environment (Policies NE1, NE2 and NE3) and achieving design excellence (Policy D1).

### Policy CC8 - Overheating and cooling

- A.** The Council will ensure that development is designed to minimise overheating and promote cooling. The Council will:
- i.** Support proposals which seek to adapt and improve existing buildings, to improve ventilation, and address overheating and promote cooling, where they are in accordance with the other policies in this Plan.
  - ii.** Require all development to minimise the adverse impacts of overheating through the application of the London Plan cooling hierarchy. Applicants should include information demonstrating that the risk of overheating has been mitigated through the incorporation of design measures in the Sustainability Statement.
  - iii.** Resist applications that include active cooling (air conditioning) and non-essential mechanical plant. Applications for new build development that include active cooling will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it and other passive measures have been integrated into the development. Applications for existing non-residential buildings will need to demonstrate there is a clear need for additional, or replacement, active cooling equipment and that other passive measures have been integrated. Where need is demonstrated to the Council's satisfaction, the Council will also require the carbon used to operate the system to be offset through the installation of solar photovoltaics.
  - iv.** Require applicants to incorporate measures to cool buildings through the use of materials and finishes. The Council will expect materials and finishes to have the ability to reflect sunlight.
  - v.** Require applicants to incorporate measures to cool the spaces around and between buildings using appropriate materials, finishes, and greening. Trees should provide adequate canopy cover for greater cooling effect.

- 8.74** The design of our environment has a significant effect on the heat we perceive and experience. As the UK's climate changes in the coming decades, periods of high temperature will become more common and more intense. As recent heatwaves have demonstrated, high temperatures are a dangerous threat to health and wellbeing and reduce economic productivity. Given this, it is important to ensure that buildings and spaces in Camden are designed to promote cooling and reduce overheating.
- 8.75** Here, potential measures to cool buildings and the spaces around buildings include:
- Controlling solar gain (window design – size, solar transmittance of glass-g-value, depth of window reveal, window openings)
  - Shutters and blinds, perforated shutters aiding ventilation and shading – noting that different solar protection may be required for different orientations or across the same facade i.e. external overhang shading for south facing windows
  - Dual aspect units
  - Inset balconies
  - Design layouts to promote natural ventilation
  - Ceiling height at 2.6m
  - Using materials and finishes to reflect sunlight (see GLA Roofs Designed to Cool)
  - Ceiling fans
  - Hard surfaces (permeable) to be kept to a minimum
  - Maximising green landscaping (please see policies contained in the Natural Environment chapter)
- 8.76** The Council will expect applicants to demonstrate that all measures to cool buildings and the environment between buildings have been explored and integrated within the development. Here, applicants could use the Good Homes Alliance overheating risk tool to demonstrate how any risk has been mitigated.
- 8.77** Active cooling (air conditioning) and excessive mechanical plant will not be acceptable unless it is demonstrated to the Council's satisfaction there is a clear need for it (i.e. sterile internal air, for some non-residential uses) and all other passive measures have been integrated. In addition to increasing the demand for energy, air conditioning and plant equipment expel heat from a building making the local micro-climate hotter. Where the use of this equipment is considered acceptable by the Council, we will expect developments to provide an appropriate level of mitigation towards cooling the local environment, including generation of renewable energy through solar photovoltaics, planting in the public realm, green walls and roofs or other measures as recommended.

## Policy CC9 - Water efficiency

- A.** To maximise water efficiency in Camden the Council will:
- Require all new development to be designed to be water efficient;
  - Require all residential developments to meet the optional requirement for water efficiency set out in Part G of the Building Regulations of 110 litres per person per day (including 5 litres for external water use). Proposals will be strongly encouraged to reduce daily water use even further than this (to, for example, 85 litres per day per person) where possible;
  - Require all new build non-residential development to achieve 'excellent'

for category Wat 01 of BREEAM unless it can be demonstrated that it is not technically feasible;

- iv. Require all new buildings to include rain water harvesting appropriate to the scale and nature of the proposed development; and
- v. Require major developments and high, or intense, water use developments, such as hotels, hostels and student housing, to include a grey water system, unless it is demonstrated to the Council's satisfaction that this is not feasible or practical.

**8.78** London has lower rainfall than the national average while having a very high population density. This combination of limited water resources and high demand has resulted in London being declared an area of serious water stress and this trend is likely to be exacerbated by climate change. Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rainwater and grey water on-site.

**8.79** Major developments and high or intense water use developments, such as hotels, hostels and student housing, should include a grey water and rainwater harvesting system. Where such a system is not feasible or practical, developers must demonstrate to the Council's satisfaction that this is the case.

## **Policy CC10 - Sustainable design and construction certification**

- A.** The Council will ensure that development achieves the highest possible standards of sustainable design and construction. The Council will:
- i. Require residential development resulting in the conversion or extension of 500sqm or more, or delivering 5 or more dwellings, to achieve a minimum of 'excellent' in BREEAM domestic refurbishment.
  - ii. Require non-residential development resulting in the conversion or extension of 500sqm or more floorspace to achieve a minimum of 'excellent' in BREEAM non-domestic refurbishment.
  - iii. Require non-residential development (new build) of 500sqm or more floorspace to achieve a minimum of 'Excellent' BREEAM Non-domestic new construction.

**8.80** BREEAM (Building Research Establishment Environmental Assessment Method) is a tool that enables us to assess the environmental sustainability of a development. BREEAM and BREEAM domestic refurbishment contains the following categories: Energy, Water, Materials, Waste, Surface Water, Management, Transport, Land use, Ecology, Health and Wellbeing, and Pollution. Each category contains credits that can be obtained by implementing a sustainable design or construction measure.

**8.81** The London Plan encourages boroughs to include BREEAM targets in Local Plans where appropriate. The Council has applied BREEAM excellent for non-residential schemes of 500sqm or more floorspace since 2017. We have been successfully applying sub targets of the available credits in the categories for Energy, Water,

and Materials (60% Energy, 60% Water, and 40% Materials), which were developed in consultation with the Building Research Establishment within the assessment categories of Energy, Water and Materials. The securing of the credits in these categories is considered to have the greatest environmental benefits and more information can be found in our Camden Planning Guidance Energy Efficiency and Adaptation.

## Managing flood risk

- 8.82** The National Planning Policy Framework requires Local Plans to take account of all sources of flood risk so as to avoid, where possible, flood risk to people and property. Camden is classified as being in Flood Zone 1, as there are no main rivers within the borough. All main rivers historically located within Camden are now incorporated into the Thames Water sewer network. These are referred to as 'lost' rivers and include the River Fleet, River Westbourne and River Tyburn.
- 8.83** Flooding from surface water and sewer sources pose the greatest risk to flooding in the borough, and the risk is interconnected, due to the prevalence of the combined sewer system. Camden experienced significant flooding in 1975, 2002, and 2021, and the probability of such events recurring is likely to increase as a result of climate change. Camden also experiences some flooding from groundwater sources particularly in areas to the north and the south of the borough, and parts of Camden also fall within the Counters Creek catchment area, which covers several London boroughs.
- 8.84** The Council has updated the Strategic Flood Risk Assessment (SFRA) for the borough. This provides a clear picture of the potential risks associated with flooding in Camden and outlines the requirements with regard to ensuring that these risks are managed in a sustainable way into the future.
- 8.85** The location, form, and use of a development, and any flood mitigation measures used, can have an impact on flood risk. Camden is a Lead Local Flood Authority, which means the Council has responsibility for managing flood risk from surface water and groundwater in the borough. The following policies set out the Council's approach to managing flood risk, to ensure that development in Camden does not increase flood risk and instead reduces the risk of flooding where possible.

## Policy CC11 - Flood risk

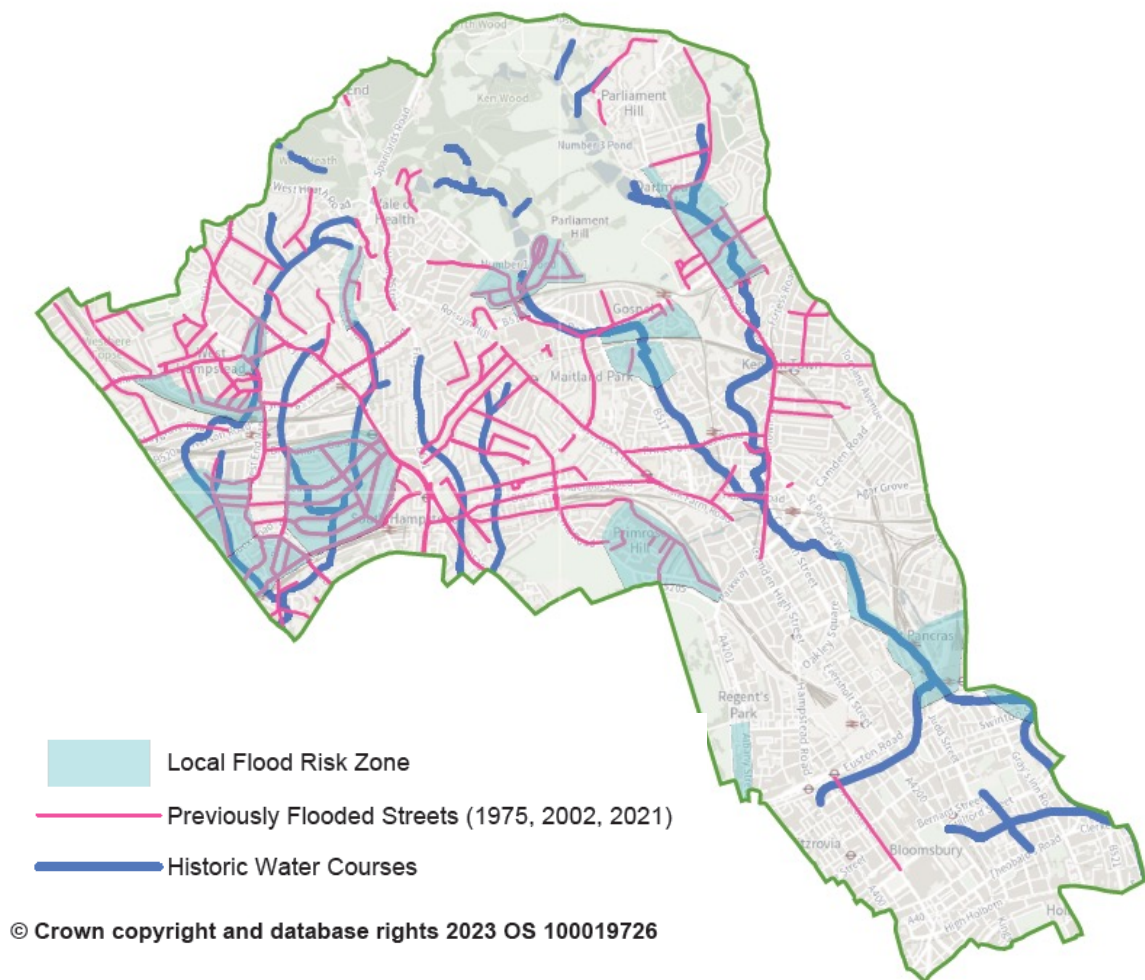
- A.** The Council will seek to ensure that development addresses and reduces flood risk to mitigate the impact of flooding on Camden's communities, both now and in the future. The Council will:
- i.** Require applicants to use the borough's Strategic Flood Risk Assessment to identify whether their site is at risk of flooding from any source. Certain developments are exempted from this, and these are set out in the supporting text below.
  - ii.** Require site specific flood risk assessments to be submitted for:
    - a.** All sites of 1 hectare or greater;
    - b.** All applications where flood risk has been identified in accordance with criteria (i); and
    - c.** All basement development, where flood risk has been identified in

- accordance with criteria (i).
- iii. Expect Flood Risk Assessments (FRA) to be prepared in accordance with the guidance set out in the Council's Strategic Flood Risk Assessment and demonstrate how a development has been designed to be resilient to flooding and set out how the risk of flooding will be mitigated over the lifetime of the development, without increasing flood risk elsewhere. Recommendations in the FRA will be secured by planning condition.
  - iv. Require all new, or basement, development located within the Counters Creek catchment area to limit sewer discharge rates.
  - v. Support the retrofitting of flood resilience and flood resistance measures to properties that have previously experienced flooding, or are at risk of flooding.

## Sources of flood risk

- 8.86** The Council's Strategic Flood Risk Assessment provides information on all sources of flood risk in the borough including:
- Fluvial flooding;
  - Surface water flooding – covering previously flooded streets; Local Flood Risk Zones; and Critical Drainage Areas;
  - Groundwater flooding;
  - Sewer flooding; and
  - Artificial sources of flooding, including flooding from reservoirs and ponds. Map 10 below also shows areas of historical flooding in Camden and Local Flood Risk Zones.

## Map 10 – Areas of Historical Flooding in Camden and Local Flood Risk Zones



- 8.87** Surface water flow paths are also shown on the Environment Agency’s flood risk maps (risk of flooding from surface water), which reflect differing levels of risk. Whilst the dataset is relatively broad and high level, it predicts the conveyance of surface water through the urban landscape. The Council also has a record of all known previously flooded streets where surface water and sewer water has affected properties, and this is available to view on the Council’s website.
- 8.88** The Council will expect applicants to refer to the Strategic Flood Risk Assessment when identifying flood risk in relation to a site. Areas at risk of flooding may be subject to change however (following future flood events) and as such reference should also be made to Environment Agency surface water maps and any further modelling undertaken (published on the Council’s website).
- 8.89** The following development types are exempted from this however and are not required to identify flood risk posed to the site:
- minor non-residential extensions (industrial/commercial/leisure etc): extensions with a floorspace not in excess of 250 square metres;
  - alterations, development that does not increase the size of buildings, e.g. alterations to external appearance;
  - householder development, that would not create a separate dwelling within the curtilage of the existing dwelling; and
  - changes of use (except where this would introduce a more vulnerable use).

## Flood risk assessments

- 8.90** The National Planning Policy Framework states that in Flood Zone 1 a site specific Flood Risk Assessment should be submitted for all proposals involving:
- sites of 1 hectare or more;
  - land which has been identified by the Environment Agency as having critical drainage problems;
  - land identified in a strategic flood risk assessment as being at increased flood risk in future; and
  - land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.
- 8.91** Where a Flood Risk Assessment (FRA) is required, the Council will expect this to identify the main flood risks to a development site, assess whether the development will increase flood risk, and set out recommendations for the provision of suitable flood mitigation measures to reduce the impact of flooding at the site and in the surrounding area. The Flood Risk Assessment should consider all sources of flood risk and demonstrate how risk will be managed now and over the lifetime of the development, taking into account climate change and vulnerability of its users.
- 8.92** A flood risk assessment should be appropriate to the scale, nature and location of the development. Applicants should refer to the Council's Strategic Flood Risk Assessment (SFRA) when undertaking a Flood Risk Assessment, to assist in determining the likely impact the development will make to flood risk. It is also recommended that applicants use the Environment Agency guidance on flood risk assessments when considering the scope of the assessment.
- 8.93** In addition to this, where a development is proposed in an area at risk of flooding the Council will expect the Sequential Test to be applied in accordance with the NPPF and the Planning Practice Guidance on Flooding.
- 8.94** For sites identified as being at risk from flooding, the Council will expect the Flood Risk Assessment to demonstrate that:
- the most vulnerable uses are located in areas at lowest risk of flooding within the site;
  - the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
  - the development incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
  - any residual risk can be safely managed; and
  - safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
- 8.95** It is recommended that where a site is identified as being at risk of flooding, applicants seek pre-application advice from the Council, at the earliest opportunity.



## Counters Creek

- 8.96** The Counters Creek Catchment extends across several Boroughs north of the River Thames, including the Royal Borough of Kensington & Chelsea, and the Boroughs of Hammersmith and Fulham, City of Westminster, Brent, Ealing, and Camden. The catchment comprises an area of approximately 85 km<sup>2</sup> of which 18% is within Camden. Thames Water records indicate a greater number of properties have flooded in connection to the Counters Creek Catchment west of the borough. There is a greater risk of flooding to people and property in the downstream reaches of the Counters Creek Catchment, than in Camden, which is in the upstream catchment. Discharge rates in the upstream catchment should however be limited to minimise impact to neighbouring boroughs.

## Basements

- 8.97** Basements can affect the ability of the ground to absorb rain when soil is replaced by an impervious structure and can be particularly susceptible to flooding. The approach to basements and flood risk is set out in Policy D6 Basements.

## CC12 - Sustainable drainage

- A.** The Council will seek to control surface water run-off from development to reduce the risk of flooding. The Council will:
- i.** Require all development to include permeable surfaces, incorporate green and blue roofs, and seek to replace non-permeable surfaces where feasible. This should be documented within the Sustainability Statement, or Drainage report if required.
  - ii.** Resist proposals including impermeable surfacing unless it can be demonstrated to the Council's satisfaction that this is unavoidable.
  - iii.** Require all major development to reduce surface water run off rates to greenfield run-off rates, through the application of Sustainable Drainage Systems, following the drainage hierarchy in the London Plan.
  - iv.** Require Sustainable Drainage Systems to be designed to provide multi-functional benefits and be integrated into the development.
  - v.** Expect sustainable drainage system proposals to meet national and local guidance to ensure they are adequately designed, built and maintained for the lifetime of development.
  - vi.** Require a drainage report to be submitted with all major applications. A drainage report for basement developments and other vulnerable development (as set out in Annex 3 NPPF) is to be submitted in areas identified at risk of flooding (Policy CC11).

- 8.98** By increasing the amount of permeable surfaces into which rainwater can be absorbed, new development can reduce stress on the drainage network from previously developed sites and reduce the risk of flooding to properties downstream.

- 8.99** For developments that reduce the amount of permeable surfaces, consideration of Sustainable Drainage Systems early in the design process is essential to ensure that

greenfield run off rates are achieved. Early consideration of Sustainable Drainage Systems (SuDS) in the design and planning of a scheme can lead to improved integration of measures and multi-functional benefits. The Council will require developments to utilise Sustainable Drainage Systems, to achieve greenfield run-off rates, unless it is demonstrated to the Council's satisfaction that this is not feasible. Surface water should be managed as close to its source as possible, in line with the drainage hierarchy in the London Plan. Where it is not possible to achieve greenfield run-off rates, run-off rates should be as close to this as possible (a greenfield run-off rate is one that reflects the natural rate of water run-off from a site before it was developed).

- 8.100** A drainage report should be submitted with all major applications, basement developments and other vulnerable development in areas identified at risk of flooding. The drainage report should include:
- identification of flood risk;
  - assessment of existing run-off, and greenfield run off rates;
  - calculation of attenuation volume m<sup>3</sup>, in order to achieve greenfield run-off rates;
  - identification of measures, in line with the drainage hierarchy, to reduce run-off rates; and
  - details of proposed run-off rates.
- 8.101** Applicants should also demonstrate how their proposal will mitigate the potential flooding of other properties. When determining the suitability of SuDS, vulnerability and the importance of local ecological resources, such as water quality and biodiversity should be considered. SuDS should seek to provide multifunctional benefits such as, enhancing biodiversity, cooling, improving visual amenity, and providing attractive active walking and cycling routes, where possible.
- 8.102** A plan for the long term maintenance of the SuDS should be included with the proposal for development.

# Delivering an Inclusive Economy



# Chapter 9: Delivering an inclusive economy

- 9.1** Local Plan policies on the economy aim to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to and share in the Borough's economic growth.
- 9.2** Camden has concentrations of high performing growth sectors, a significant research base and is home to a variety of national institutions. Local strengths include the numbers of businesses engaged in technology and science, clusters of medical and educational uses, legal services, consultancy and a wide range of creative industries. The vibrant social mix and creative spirit make the Borough an attractive environment in which to invest.
- 9.3** In 2020, Camden had the second highest number of jobs of any London borough, more than 380,000 (nearly double the number of residents), demonstrating the Borough's importance to London's economy. Total numbers of jobs in the Borough grew by over 24% from 2008-2021. The density of jobs reflects the scale and mix of business, research and cultural activities within the Central Activities Zone and the importance placed by businesses and organisations on proximity with around 230,000 workers commuting from outside of Camden.
- 9.4** While the last decade has seen dramatic changes in how people shop and access services, the Borough's centres and high streets are generally performing well with vacancy rates in 2022 having largely returned to pre-pandemic levels. There is also a vibrant evening and night-time economy concentrated in the south of the Borough and Camden Town.
- 9.5** Although Camden has many of the characteristics of a vibrant and resilient economy, there are challenges which the Local Plan's policies seek to respond to:
- Areas of relative disadvantage experiencing income and employment deprivation due to low pay, insecure work and unemployment. This is impacting disproportionately on younger residents, Black, Asian and Other Ethnic communities and disabled people who are under-represented in higher-skilled occupations;
  - Around a quarter of working people in the borough are experiencing poverty;
  - Too many residents lack a financial stake in the economy or are unable to influence decisions;
  - Demand for large corporate office space and limited land availability can make it challenging for start-ups, smaller businesses and not-for-profit organisations to find workspace on fair and affordable terms;
  - Significant numbers of office and industrial buildings will struggle to meet tighter energy efficiency standards without timely intervention;
  - Reflective of wider inequalities, some residents experience exclusion from the digital economy.
- 9.6** Our planning policies seek to ensure a continuing supply of office, industrial and warehousing land and premises to deliver growth and innovation while securing commitments from schemes focussed upon social, economic and environmental outcomes.

**9.7** Allocated sites suitable for additional workspace are identified in chapters 3, 4, 5 and 6 of the Local Plan, including where sites can be improved or intensified. Camden is an attractive place for business investment for multiple reasons including the Borough's transport connections and quality of the public realm. The infrastructure schedule in Appendix 1 of the Local Plan identifies the main infrastructure commitments and plans, many of which will help to support the growth of businesses and social enterprises.

**9.8** Throughout this chapter, the terms 'employment use or space', 'business' and 'workspace' are used to refer to the following uses:

- Commercial, business and service (Use Class E) - Class E covers uses previously defined as A1/2/3, B1, D1(a-b) and indoor sport from D2(e). It therefore includes retail, cafes, restaurants, offices, research and development (R&D), light industry, health centres and indoor gyms;
- General industrial uses (Use Class B2);
- Storage and distribution (warehousing) (Use Class B8); and
- Other unclassified uses of similar nature to those above, such as depots or building merchants (classed as Sui Generis).

## **Policy IE1: Growing a successful and inclusive economy**

- A.** To secure a strong, diverse, sustainable and inclusive economy in Camden, and maximise opportunities for the borough's residents, businesses and voluntary sector to contribute to and share in the success of Camden's economy, the Council will:
- i. use our planning powers to support businesses and enterprises of all types and sizes for a variety of business activities, while prioritising the delivery of space for key growth sectors, research-based activities and start-ups, smaller businesses and social enterprises;
  - ii. maintain a stock of premises available on a range of terms and conditions for firms with differing resources, including provision of affordable workspace;
  - iii. expect larger schemes to provide a range of unit sizes to increase the supply of space available for smaller businesses and entrepreneurs;
  - iv. resist the loss of viable employment space, especially where this offers lower cost or flexible space suitable for use by smaller businesses;
  - v. support local business start-ups, entrepreneurs and residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning of the scheme, construction, fit out and occupation;
  - vi. ensure that new workspace is well laid out, functions well for its intended users and can adapt to changing working practices;
  - vii. expect landowners and developers to introduce temporary ('meanwhile uses') in appropriate circumstances;
  - viii. work with landowners and developers to bring forward comprehensive mixed-use regeneration proposals that provide for the intensification of under-utilised sites/land to deliver employment uses and other priority uses;
  - ix. seek the provision of premises and sites that meet the specialist requirements of sectors including creative industries, life sciences and jewellery-related uses in Hatton Garden;

- x. seek to address barriers to work and support health and wellbeing, such as the provision of childcare facilities to support working families;
- xi. expect developers to provide high-speed, reliable digital connectivity to support occupiers; and
- xii. require applications involving a loss of employment floorspace to make a financial contribution towards local skills, training, and employment initiatives, where it has been demonstrated to the Council's satisfaction that the loss of employment floorspace/ land is acceptable.

**9.9** Camden has generally been successful in securing new and refurbished workspace, including for newly emerging clusters and activities. This is reflected by the overall size of the local economy, the range of sectors and proportion of high growth businesses. However, the relatively high rents and overall costs of setting up and running businesses is a significant barrier for start-ups, residents wanting to run their own business and not-for-profit organisations. Operating costs are expected to remain high.

**9.10** In-work poverty is also a major challenge with too many residents currently in jobs that do not adequately cover living costs and lacking the opportunity to participate in, and benefit, from the growth they see around them.

**9.11** The introduction of permitted development rights to speed the supply of housing have resulted in losses of viable workspace in Camden, including the studio and workshop spaces for which there is a strong demand from local enterprises and entrepreneurs. This has disproportionately impacted some areas such as Kentish Town. Council monitoring of development shows that over the last 15 years, the supply of additional floorspace has been dominated by large floorplate offices, much of this concentrated in King's Cross and Holborn.

### **The need for different workspace types and sizes**

**9.12** There is also an insufficient supply of premises to support the growth of emerging sectors, a very limited supply of sites for specialist uses, such as wet labs, and difficulties finding accommodation to support makers, local supply chains or future retrofitting programmes due to pressures on the supply of industrial sites. Many occupiers require good quality space with potential for networking and community. For early-stage businesses the costs of fit-out can have a substantial impact on viability. The limited availability of land in Camden and competition from other land uses is expected to have a continuing impact on local property markets for the foreseeable future. Policy IE4 on affordable workspace sets out revised requirements to increase the supply of workspace below market rents, including in locations where less development at scale tends to come forward.

**9.13** Outside of the planning process, the Council is also actively looking at the ways in which it supports for businesses and social enterprises through use of its assets, by working with other landowners and increasing access to finance by the creation of a community wealth fund. Our policies aim to retain viable workspaces, including smaller, flexible spaces where supply is especially limited. We will seek flexible terms of occupancy where this is necessary to support smaller businesses.

## **Employment support, training and learning**

- 9.14** The planning system has an established role in obtaining developer contributions which can be invested in employment and training initiatives, secured through a planning obligation (with a Section 106 agreement). This is intended to support residents into good quality work which offers stability and security. These programmes include preparing young learners with the skills they require for when they start a career.
- 9.15** Depending on the size of scheme, the Council will seek local employment opportunities during the construction and fit-out phases, including the procurement of local goods and services and where possible, commitments from future occupiers of a development.
- 9.16** The Council's flagship scheme for helping residents into work, training and education and start a business is known as 'Good Work Camden' while the STEAM (Science, Technology, Engineering, Arts and Maths) programme has been established to support young people to access opportunities into the knowledge economy through an innovative approach linking schools and employers. Camden's Inclusive Business Network has been established as a community of best practice to promote and share learning around good work standards, emphasising inclusive and accessible recruitment practices, access to flexible working arrangements and progression and development of employees.
- 9.17** We will expect developers and employers to support local efforts to provide better job security and more equitable outcomes for our residents. Camden Planning Guidance: Employment sites and business premises provides more detail on our approach to training, skills and education. This includes advice on where London Living Wage requirements apply, e.g. for all Camden apprenticeships.
- 9.18** Furthermore, where permission is sought for educational uses (both permanent and temporary) in the borough, the Council will also seek to secure a financial contribution towards local skills, training, and employment initiatives, in accordance with Policy IE1 above.

## **Reducing resource consumption and climate action**

- 9.19** Concerns around the environmental impacts arising from demolition and rebuilding emphasises the importance of space being well-designed and capable of configuration for different activities/uses. One way of achieving this is through use of flexible floorplates with careful consideration given to the location of fixed building components such as lifts, service risers, plant and bathrooms. More generally all development should function well for its users in line with our design policies with consideration given to making all buildings, especially those visited by members of the public, accessible wherever this is possible.
- 9.20** Employers have a vital role in tackling the climate crisis as funders and occupiers of development and through the sharing of knowledge and working in partnership with others. The Council will seek business engagement and participation in local climate action and will expect proposals to embed low impact approaches to the design, operation and servicing of buildings in line with the Local Plan's climate change policies.

## **Meanwhile uses**

- 9.21** A key aim of the Plan is to make the best use of the borough's limited supply of land, including the opportunities presented by vacant or under-utilised sites. 'Meanwhile' or temporary uses have a role in bringing properties back into use, improving access to workspace, bringing people and businesses together in new and interesting ways or demonstrating how a centre / high street's offer might positively evolve.
- 9.22** In some cases, 'pop up uses' can allow the trialling of new formats showcasing the potential of a space or provide in-person events/experiences linked to brands and product launches. Meanwhile uses may also form part of a set of interventions (including outside of planning) facilitating changes in a centre's offer; while larger developments also provide opportunities to deliver community benefits during their relatively longer construction programmes. The meanwhile use should respond to local needs and priorities and be offered at low cost.

## **Opportunities to provide new workspace and grow clusters**

- 9.23** The site allocations in the Local Plan identify the main opportunities to intensify existing employment sites to provide a better range of workspaces, including the re-provision of industrial uses. Adopted Neighbourhood plans and Council-led planning frameworks provide further detail on how different land uses can be incorporated and benefits for the local community maximised.
- 9.24** Proposals incorporating employment floorspace should respond to the local economic context. This includes how a site relates to existing clusters of activity, including any other employment uses on-site. Some smaller enterprises and start-ups have a particular need for cost-effective space located within an established cluster. The competitiveness and productivity of research and development uses can rely on being part of an 'ecosystem' where there are opportunities to interface with related-uses, professionals and institutions.
- 9.25** Where workspaces are being designed for a particular sector or type of occupier, dialogue with existing businesses and organisations operating in the cluster is likely to be necessary to ensure a scheme's benefits for the cluster and of co-location are maximised.

## **Access to supporting facilities and services and the local environment**

- 9.26** The Council will also encourage developers to address identify gaps in service provision, especially where this is linked to barriers in being able to access good work, for example the inclusion of on-site childcare provision. In some cases, providing shared-use (i.e. community access) to a business' facilities may have significant benefit in addressing a local need while access for start-ups/smaller businesses to on-site communal facilities can reduce their capital costs upfront and help to provide a stimulating working environment.
- 9.27** Access to high quality broadband is essential for the majority of business types. Developers will be expected to ensure that connections are provided to all workspaces within the development site and delivered on a 'plug-and-pay' basis.



- 9.28** Camden’s attractiveness as a place to work is due to its excellent transport connectivity, the quality of the public realm and access to local amenities, including leisure and entertainment uses. We will continue to seek investment in local infrastructure from developers of employment/mixed-use schemes in line with relevant Local Plan policies.

## Offices

- 9.29** Camden’s office stock is large (c.3-5 million sqm of floorspace) and varied in nature. It has an important role in supporting strategic functions in Central London. For the most part it is occupied and in good condition. Positively for office markets operating in Camden, there are multiple sectors and activities where the office remains an essential part of business operations, including growth sectors such as data, IT and communications. Conventional office space is also required by a variety of creative industries. There is also a strong demand for hybrid spaces and labs to support science-based and research activities. For some organisations, the benefits of clustering and proximity to related uses and activities rely on maintaining a physical presence while for those living in shared accommodation, access to workspace away from home can be an essential requirement.
- 9.30** However, it is recognised that there has been a permanent shift towards greater working from home with employees in some sectors attending the workplace less frequently. As part of the UK’s transition to net zero, there is an onus on landowners to upgrade (even relatively recently built) office buildings to meet tighter energy efficiency requirements. While there is a growing market for these ‘retrofit’ projects, it is likely that some office buildings cannot be upgraded at a reasonable cost.
- 9.31** The policy seeks to retain office floorspace where it can continue to meet an economic need whilst providing flexible for conversion to permanent self-contained housing (the Local Plan’s priority use) where there is clear evidence this is no longer possible. The conversion of large office buildings may in some cases provide an opportunity to improve local access to smaller, flexible accommodation for start-ups and SMEs, particularly affordable workspace.

## Policy IE2: Offices

- A.** The Council will manage and protect the stock of offices in the borough to ensure that suitable and viable accommodation is retained, and that businesses, residents and social enterprises are able to access workspaces that meet their requirements. This includes ensuring a sufficient supply of space for research and development uses.

### Provision of additional floorspace

- B.** The Council will:
- i.** support proposals involving additional office floorspace and refurbishment of existing stock within parts of the Central Activities Zone where there is an established commercial, or mixed-use character, and in cases where Class E(g) has been specified as an appropriate use in the Site Allocation policies, Euston Area Plan or other development plan document. In total, it is anticipated that

around 340,000sqm of floorspace will be provided for office and research and development uses.

- ii. support office provision in other centres where this is of a scale commensurate for the centre.
- iii. seek to ensure that where office/mixed-use schemes are located within an established retail frontage, active uses must be provided at ground floor.

### **Managing the supply of offices**

- C. The loss of offices in the borough will only be considered acceptable where:
  - i. A comprehensive marketing campaign has been undertaken of at least 12 months which uses a variety of agents and is based on a realistic rent. The marketing evidence should demonstrate that suitable economic uses have been fully explored and evidenced to the Council's satisfaction, with consideration given to the following:
    - a. Refurbishment and modernisation of the premises to enhance its attractiveness to potential occupiers;
    - b. Discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements;
    - c. The feasibility of reconfiguring the premises to meet the demands of smaller businesses, including studios, start-ups and micro businesses.
  - ii. Where the condition of the premises is cited as a reason for insufficient interest in the property, the Council may request viability evidence to demonstrate it is not possible for refurbishment works to be undertaken.
- D. Where the premises cannot lawfully be leased due to their energy efficiency performance, the applicant will be required to submit evidence to the Council demonstrating that it is not viable for improvement works to be undertaken.
- E. In cases involving the loss of over 4000sqm (GEA) of office floorspace, we will seek the retention of a proportion of floorspace as affordable workspace. This will normally be secured at ground floor level.

**9.32** The Council's Economic Needs Assessment has used a demand-based approach considering labour growth to project the total quantum of office floorspace likely to be required over the Plan period (406,359 sqm). This figure has been adjusted to take account of hybrid working practices and is considered achievable given delivery in recent years and the potential supply of sites. Within the quantum of floorspace projected, around 210,000sqm is expected to be delivered from major schemes which already have planning permission. The vast majority of this is under construction so there is a high certainty of implementation during the first five years of the Plan period.

**9.33** The Council will continue to steer office provision towards the Central Activities Zone and other centres commensurate with their size and function. This will contribute to the vitality of centres and enable the further development of existing clusters of firms. A significant component of this supply will be from the site allocations set out within this draft Local Plan.

**9.34** On top of this planned provision, it is reasonable to assume a continuing supply of 'windfall' schemes (i.e. additional premises or sites becoming available

for development beyond those already identified) to meet changing tenant requirements and the development of clusters. While refurbishment schemes may not always deliver significant additional floorspace, they too can be important in enabling occupiers to meet changing business needs.

### **Requirements relating to the loss of office space**

- 9.35** The Council has an established process for dealing with situations where offices become obsolete. In such cases, the Council will expect the provision of marketing evidence to show that there is no potential interest from occupiers and based on a realistic rent (guided by average local market values for similar space). As a minimum, the marketing should be conducted over a 12-month period and by at least two agents with knowledge of the local property markets. Robust evidence should be submitted in line with the detailed approach set out in Camden Planning Guidance on Employment Sites and Business Premises, including verification of online marketing undertaken.
- 9.36** As stated, significant elements of the office market continue to perform well in Camden and far greater emphasis is being placed on the workspace quality and building performance. It is important to guard against the wholesale loss of office floorspace where these issues are capable of being addressed. Various neighbourhood plans and the London Plan seek to protect small office capacity in some centres.
- 9.37** Developers may therefore be asked to provide viability evidence to show that refurbishment for continuing office use is not possible. This includes where assets have been 'stranded' as a consequence of prevailing energy efficiency standards. Where the Council accepts it is not possible to improve the environmental performance of an office in a cost-effective manner, the requirements for marketing will be waived.
- 9.38** Where large office buildings become redundant, this creates the possibility of delivering much needed permanent self-contained housing (including affordable housing), but also affordable and low-cost workspace to address local economic needs. Offices providing greater than 4,000sqm are usually multi-storey buildings, often located in Central London. The optimal mix of uses (including the proportion of workspace and permanent self-contained housing (including affordable housing)) will depend on matters including the size of site, depth of floorplates, the existing and approved supply of affordable workspace in the locality and whether the proposal involves conversion of an existing building. Where office space is vacated at ground floor level, we will seek the re-provision of affordable workspace. In line with Policy IE1, the Council will also require a financial contribution for the loss of employment floorspace. Where the loss of office space is accepted and permanent self-contained housing is proposed, the Council will seek the delivery of affordable housing in accordance with Policy H4 Maximising the Supply of Affordable Housing.

## **Camden's Industrial Land Supply**

- 9.39** Camden has a small but important stock of industrial land (just under 35 hectares). This supports general and light industrial premises as well as other uses such

as transport, utilities and waste management. A sizeable proportion of this industrial land is located on, or near to, former railway yards and sidings and was redeveloped over the last decades of the 20th century to provide light industrial sheds and storage and distribution facilities. This is often arranged at low densities and includes extensive areas of parking and yard space.

- 9.40** About a quarter of the borough's industrial land supply (about 8.5 hectares) is designated as an Industry Area on the Local Plan Policies Map. This is equivalent to the Locally Significant Industrial Sites (LSIS) designation used in the London Plan to describe sites with importance for industrial and related functions. The Council's Economic Needs Assessment notes that the majority of industrial land in the borough is non-designated. It identifies 17 clusters of non-designated sites. Many sites are small, and some clusters have lost industrial capacity over the last decade, including from 'permitted development', where the use can change without the need to seek planning permission.
- 9.41** Around half of Camden's industrial land supply (c.18 ha.) is occupied by distribution / logistics depots. These have traditionally tended to be land-hungry uses with extensive areas of vehicle parking. The Local Plan's transport policies support a shift towards more sustainable, 'last mile' delivery operations based on consolidation and use of smaller, lower impact vehicles, including cargo bikes. There is likely to scope to reduce the footprint of these uses and find alternative and complementary uses on some sites, subject to the needs of the Central Activities Zone continuing to be met.
- 9.42** Within this industrial land supply, there is one waste management site, and one aggregates site in the borough which are protected through other Local Plan policies. The Hatton Garden area in the south of the borough has served as a nationally important centre for the jewellery manufacturing and trading that gives the area its character. Local Plan policy S2 seeks to protect the jewellery-related uses in this area.

## Policy IE3: Industry

- A.** The Council will manage and protect the supply of industrial and warehousing land, recognising its value for a variety of business types, while recognising the opportunities for some sites to be used more efficiently to deliver wider Local Plan objectives.
- B.** We will prioritise the retention of industrial and warehousing land, particularly where it has an important local economic role or provides essential functions or services for the CAZ. In exceptional cases, where the applicant suggests the site is no longer suitable for a continuing industrial use, the Council will require marketing evidence and viability evidence in line with the approach set out for offices in Policy IE2.
- C.** Where the Local Plan proposes the development of existing industrial and warehousing land, this must form part of a comprehensive and intensified employment-led approach. To fully realise the potential of such developments, applicants must have regard to:
- i.** The delivery of significant numbers of jobs for growth sectors, small and

medium enterprises, start-ups and businesses supporting the Central Activities Zone and local supply chains;

- ii. Reprovision of a range of premises that takes into account the varied operational requirements of industrial businesses;
- iii. Prioritising the retention of existing businesses as far as possible. The Council may request the applicant to provide a business relocation strategy where it is not feasible to re-provide accommodation for businesses on-site;
- iv. Incorporating premises at a range of rents, including affordable workspace, and a package of employment and training contributions appropriate to the scale of the development;
- v. Ensuring the successful co-location of uses through innovative design approaches and avoiding non-employment uses compromising the operation of businesses in line with the 'Agent of Change' principle; and
- vi. The need to complete the employment element of mixed-use schemes at an early stage in the construction programme.

**9.43** The Council seeks to maintain a diverse stock of industrial premises suitable for a range of different users and activities. There have been few recent additions to the supply of industrial premises and vacancy rates are close to zero. A significant number of premises/sites are occupied by important local economy uses, including creative and cultural enterprises, with clusters of firms benefitting from the sharing of knowledge, equipment and yard space. Due to their relatively affordable rents, these workspaces can be particularly important for supporting local entrepreneurs and start-ups. Within the fringes of Central London, some uses help to support functions and services in the CAZ.

**9.44** The Economic Needs Assessment (ENA) identifies the function and role of existing clusters of sites, although there are also some smaller sites which individually provide suitable accommodation for small enterprises. The ENA also notes the potential role of industrial land in enabling new and emerging activity over the Plan period, such as building retrofit programmes, circular economy uses (e.g. the reuse/ 'upcycling' of materials) and growing more local supply chains (reducing the need to transport goods over long distances). The ENA recommends protecting remaining non-designated land given there is no ability to add significantly to Camden's industrial land supply. It is assumed that the vast majority of the remaining stock serves a beneficial economic function and therefore, development will only be supported for the same or a similar type of use.

### **Comprehensive development of industrial sites**

**9.45** The Council has identified in the Local Plan's site allocations what it considers to be the main underutilised sites where there are opportunities to intensify employment use as part of a comprehensive planned approach to development while delivering other Local Plan priorities, particularly permanent self-contained housing. Detailed policy requirements for each site are set out in the allocations. To ensure the effective regeneration of key sites, the Council has been convening discussions with landowners as part of a comprehensive planned approach that considers the most effective approach of bringing different land uses together.

**9.46** The policy recognises the need for a range of premises to be provided reflecting the different ways industrial premises are used and at a variety of rents. Where appropriate, the Council will support new approaches to the co-location of housing alongside employment uses, subject to the 'Agent of Change' approach whereby it is the developer's responsibility to ensure that impacts on the continuing operation of businesses are mitigated. Where existing occupiers would be impacted by development proposals, support should be provided to mitigate the potential disruption to their operations and, if appropriate, a business relocation strategy agreed in line with the approach set out in the London Plan.

### **Affordable and specialist workspace**

**9.47** Increasing the supply of affordable workspace is a Borough wide priority given the increases in land values in Camden and constraints on the supply of suitable accommodation for enterprises and residents to set up and grow businesses. Affordable workspace has a vital role in spreading economic opportunity more widely, ensuring that Camden residents can benefit from the growth they see around them.

**9.48** There is a need to ensure provision where it is lacking and a sufficient range of workspace types for use by different sectors/business uses, with suitable and relevant spaces provided to support local entrepreneurship and deliver social impact. Increasing provision would give more residents the ability to access a range of amenities and opportunities – including jobs - within walking or cycling distance from home.

**9.49** Many affordable workspaces in London are provided as desk-based co-working facilities for which there is a continuing demand. Early exemplars of affordable workspace provision have also demonstrated the vital role of facilities such as meeting rooms, collaboration areas, kitchens and leisure uses in ensuring affordable workspace is successful and able to meet the needs of a range of occupiers. In some cases, affordable workspace has been provided in tandem with wider community, arts and cultural uses.

**9.50** There is also a lack of some types of specialist space, for example wet labs, move-on spaces for life sciences and university 'spin-outs' enabling companies and innovators to grow their operations, studio/workshop/maker spaces and business accelerators. This is needed to support the development of existing clusters of activity, enable cross-disciplinary research and to maximise opportunities from the presence of 'anchor institutions' (major organisations with significant assets, hiring and spending power).

**9.51** The London Plan 2021 sets out that boroughs should include affordable workspace policies within their Local Plans subject to consideration of local needs and viability. It defines affordable workspace as that secured at "rents maintained below the market rate for...space for a specific social, cultural or economic development purpose".

**9.52** The Council adopted an Affordable Workspace Strategy in 2023. It sets out how the supply of affordable workspace can be increased, and the types of spaces needed. Its key aims are: to support Camden residents, start-ups, small businesses and social enterprises to access the space they need locally; enable entrepreneurs

to start and grow businesses; address the needs of SMEs, the Voluntary and Community Sector (VCS) and local social enterprises; and support/retain key growth sectors and clusters where opportunities are provided for Camden residents. The Council is also bringing forward employment opportunities through development schemes (e.g. sites in its Community Investment Programme).

## Policy IE4 - Affordable and specialist workspace

- A.** The Council will require schemes to make contributions towards a mixed and diverse economy that allows a variety of business types and size to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:
- i.** require all major schemes (including mixed-use developments) providing at least 1,000sqm GIA of offices, research and development uses or light industry (use classes E(g)(i), E(g)(ii), E(g)(iii)) to contribute to the delivery of affordable workspace.
  - ii.** seek 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years.
  - iii.** Apply the following hierarchy when securing affordable workspace:
    - a.** on-site provision of affordable workspace that meets locally identified requirements of a type and specification (configuration, fit out, etc.) and addresses the demands of priority sectors and small and medium enterprises;
    - b.** off-site provision of affordable workspace on another site in the borough that meets the requirements in (a) above. There should be a clear link between the off-site location and priorities for affordable workspace provision identified in the Council's Affordable Workspace Strategy;
    - c.** a payment in lieu (PIL) of provision that can be invested by the Council, which is equivalent to the cost of on-site delivery, in line with the payment in lieu calculator below. This will be used by the Council to fund affordable workspace elsewhere in the Borough.
- B.** The Council recognises that different types of affordable workspace are needed depending on location and that the costs of delivery will vary. To ensure the opportunities arising from affordable workspace are optimised, the Council will consider a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. Any provision must be consistent with the definition of affordable workspace set out in the London Plan. Where no affordable workspace is offered or a payment-in-lieu is not provided for viability reasons, we may seek a contribution via a late-stage viability review.
- C.** The Council will expect the affordable workspace element of a mixed-use scheme to be made available for occupation at the same time as any employment floorspace at market rents.

### Calculation of payments-in-lieu

- 9.53** The payment-in-lieu should be calculated following the steps below.

A	Calculate the equivalent market rate for the affordable workspace expected by the policy, then
B	Calculate the income multiplier for the market investment yield = $1 - \text{market investment yield}$
C	Work out capital value of the affordable workspace at full market value = market rent (A) x income multiplier (B)
D	Calculate the income multiplier for the affordable workspace yield = $1 - \text{affordable workspace yield}$
E	Work out capital value of the affordable workspace using the affordable workspace yield = discounted market rent (0.5 of A) x income multiplier (D)
F	The cost of delivering affordable workspace = C - E

**9.54** The policy sets out the need for larger employment schemes to contribute towards the delivery of affordable workspace. The Council's Affordable Workspace Strategy identifies the need for different typologies (types) of workspace, including for industrial and retailing uses, to support a diverse range of businesses and enterprises. Spaces need to be well-designed to ensure they meet the needs of their intended occupiers and provide usable, stimulating environments in which to work.

### **How affordable and specialist workspace will be delivered**

**9.55** The quantum of affordable workspace sought will be based on the overall gross amount of employment floorspace in the proposed scheme (that is in floorspace in use classes E(g)(i)/E(g)(ii)/E(g)(iii)). It will also apply to sui generis uses of a similar nature or character. The Council's preference will be for the affordable workspace to be delivered on-site to meet the needs of Camden enterprises and residents. Off-site provision may also be accepted where there is a clear link with local workspace priorities and the Council is satisfied that a greater economic impact would be achieved. The Council will require the preparation of an operating plan setting out which occupiers will be targeted during marketing of the space, which should be drawn up in conjunction with our Inclusive Economy team.

**9.56** The Council may also accept a financial payment-in-lieu of provision where evidence is provided demonstrating to its satisfaction why direct delivery of the workspace is not feasible. This may include the provision of evidence relating to viability. We may also waive the requirement for on-site delivery where there is already sufficient affordable workspace to meet local demands having regard to planning permissions in the area.

**9.57** The funds secured through payments-in-lieu will be invested in projects supported or led by the Council to deliver affordable workspace in other parts of the Borough. The Affordable Workspace Strategy identifies such opportunities. The Council may agree to the ringfencing of contributions where this would support growth sectors, particularly the need for specialist workspace.

### **The need for flexibility**

**9.58** The policy takes a flexible approach recognising access to affordable workspace varies depending on location and that opportunities will vary across different



geographies as well as between sites depending on factors such as proximity to clusters of businesses, including existing start-ups.

- 9.59** Integration between affordable workspace elements and other employment uses on-site will often have a bearing on the success of the space bringing opportunities for potential collaboration and the sharing of communal spaces and services. The nature of the intended/ target occupier is also likely to be relevant to the specification of the affordable workspace and length of discount period required.
- 9.60** While accommodation provided as 'shell and core' may be an acceptable offer in some instances, the Council will require fitted space/certain grades of space (e.g. Cat A) where this is necessary to ensure the proposed workspace can be used in an affordable way or meet specialist needs. Business rates, utilities and service charges will also be considered where relevant to understanding affordability for different users.
- 9.61** The Council will use late-stage reviews to secure contributions to affordable workspace where there have been significant changes in viability after planning permission has been granted.
- 9.62** Workspace should also be delivered in line with Camden Planning Guidance: Employment sites and business premises, which sets out more detail on how affordable workspace will be secured.

## Hotels and Visitor Accommodation

- 9.63** Hotels and visitor accommodation makes an important contribution to the local economy providing wider benefits for local businesses and visitor attractions. Visitor accommodation includes bed and breakfast premises, youth hostels, backpacker accommodation, aparthotels, serviced apartments and most other forms of short-stay accommodation intended for occupation for periods of less than 90 days.
- 9.64** The Council will steer additional provision to areas of the Central Activities Zone, where there are already concentrations of these uses, and to sites within designated town centre boundaries, recognising that hotels and visitor accommodation can contribute to the vitality of town centres.

## Policy IE5 - Hotels and visitor accommodation

- A.** The Council recognises the importance of the visitor economy in Camden and will therefore support proposals involving additional hotel and visitor accommodation that are appropriately sited and where the impacts of the proposal on local residents and the surrounding area are appropriately mitigated. The Council will:
- i.** require new, large-scale hotel and visitor accommodation to be located in the Central Activities Zone, with preference given to locations with a commercial / tourism character, a concentration of existing visitor accommodation or with an established commercial / mixed-use character;
  - ii.** support smaller and medium-sized hotel and visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road / Swiss Cottage;

iii. protect existing hotels and visitor accommodation, except where it has been demonstrated to the Council's satisfaction that the accommodation is no longer fit for purpose and the upgrading / refurbishment of the premises is not a viable option or the hotel is located away from commercial or highly accessible areas.

B. All hotels and visitor accommodation in Camden must:

- i. be easily accessible by public transport;
- ii. not lead to the loss of permanent residential accommodation, including where there is an existing planning permission, or prejudice the housing capacity identified in a Local Plan site allocation, or result in the loss of workspace for which there is an identified local need; and
- iii. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems.

**9.65** The London Plan states that a sufficient supply and range of serviced accommodation should be maintained and considers this to be an appropriate use in within the Central Activities Zone except in wholly residential streets or predominantly residential neighbourhoods. When considering proposals for additional hotel and visitor accommodation we will steer new provision to locations that are well-served by public transport. It is considered that suitable sites will generally be where there is an existing concentration of these uses.

**9.66** Due to the potential impacts arising from significant numbers of people arriving/ leaving the premises, the policy expects larger hotels to come forward on suitable sites within the Central Activities Zone. Smaller hotels are considered to be appropriate uses in town centres. We will also apply the requirements set out in the London Plan aiming to secure a proportion of rooms suitable for people using wheelchairs and other people who would benefit from accessibility measures.

**9.67** While the Council welcomes continuing investment in visitor accommodation, it is vital this does not undermine the ability to provide a sufficient supply of housing. We will therefore resist proposals that would reduce Camden's housing capacity. The Plan's employment policies, including Policy IE1, identify the importance of maintaining a range of employment spaces to meet the different needs of occupiers. We will therefore also resist proposals involving the loss of workspaces for which there is a continuing demand.

**9.68** More generally, additional hotels and visitor accommodation should be capable of being successfully integrated alongside other land uses and not result in unacceptable impacts on the local area or the community. The Local Plan's housing policies resist the use of existing homes, and sites allocated or with permission for self-contained housing, for permanent or year-round short lets.

**9.69** In line with Policy IE1, large-scale hotels and visitor accommodation will be expected to contribute to employment and training initiatives in the Borough.

## Town centres and high streets

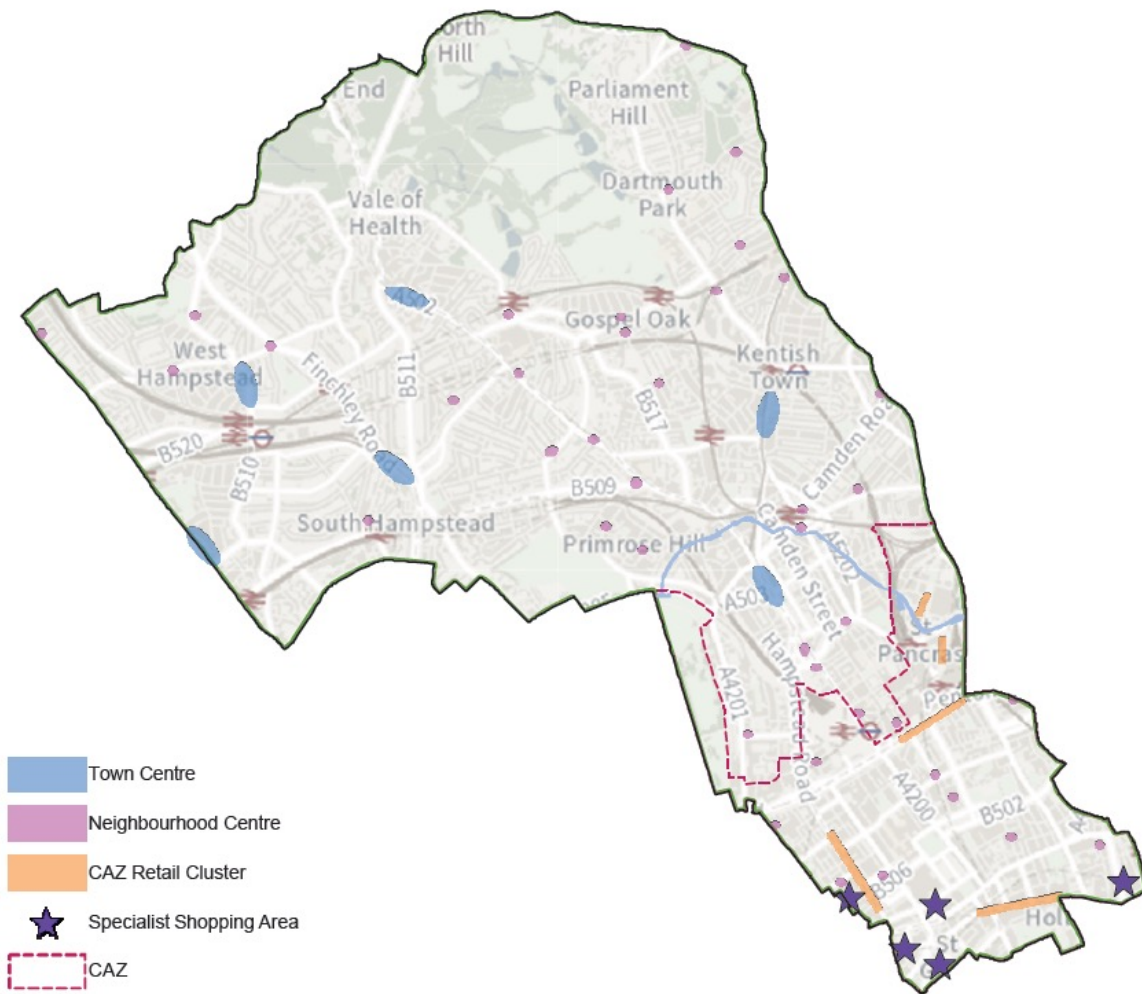
**9.70** Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole. They are places

of employment, shopping, leisure, and services and can be important for social, community and cultural exchange by providing places where people can meet and interact. Beyond centres, there is also shopping and food and drink facilities within major railway stations and small standalone shops that provide an essential role.

- 9.71** Traditional retail-based centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out of centre retail development. Town and neighbourhood centres are under pressure from a range of issues, including the impact of the cost-of-living crisis and hybrid working on 'footfall' (the number of people using a centre). This highlights the importance of allowing high streets to diversify and adapt over time in terms of managing land uses whilst ensuring that the vitality, character and role of individual centres is not put at risk. Some smaller centres in Camden are limited in terms of their offer/mix but nevertheless meet a local need.
- 9.72** The Camden Future High Streets prospectus was published to help inspire and guide change as high streets adapt to a range of challenges. It envisages high streets that are centres of creativity and innovation, providing goods, services and employment which provide material benefit for the local community and offer environments that are sustainable and accessible for all.
- 9.73** The Council's evidence, including retail survey data, shows that most of our centres continue to perform well. Not all centres have recovered to the pre-pandemic situation, particularly those that have traditionally relied on footfall from workers, but centres focussed on local catchments or in proximity to key attractions are tending to see greater expenditure. The resilience particularly of larger centres is likely to benefit from having a wider range of uses of uses and activities, including the provision of affordable workspace and meanwhile uses.
- 9.74** The Local Plan focuses on sustaining and enhancing centres, having regard to their distinctive roles, character and accessibility, while allowing beneficial change that meets local needs and priorities, including the visitor/destination role of the West End and existing retail clusters in the Central Activities Zone.
- 9.75** Both the CAZ and designated town centres beyond the CAZ are suitable for accommodating new retail, leisure, office and other main town centre uses commensurate with their scale. The Local Plan seeks to resist the further proliferation of some uses where evidence shows they could harm the health and wellbeing of Camden residents. The upper floors of retail frontages will also have a role in providing additional permanent self-contained homes (the Local Plan's priority use).
- 9.76** Neighbourhood centres are designated primarily to cater for local day-to-day shopping needs and provide services for the community (launderette, pharmacy, hairdressers etc.) although a minority also have concentrations of more specialist, comparison-based retailing. Specialist shopping areas are distinguished by their clusters of independent and niche retailing and may be a visitor attraction in their own right. There are also some non-designated areas, such as at railway stations, which predominantly serve commuters.
- 9.77** The Central Activities Zone and Camden Town town centre contain a significant amount of night-time economy uses including theatres, cinemas, live music venues and comedy clubs.

9.78 Camden’s network of centres is illustrated on Map 11 and set out in Table 7 below.

**Map 11 - Camden’s network of centres**



**Table 7 – Camden’s network of centres**

<b>CAZ RETAIL CLUSTERS</b>
High Holborn / Kingsway
King’s Cross / St Pancras
Tottenham Court Road / Charing Cross Road / New Oxford Street
Coal Drops Yard
King’s Boulevard
<b>TOWN CENTRES</b>
Camden Town
Finchley Road / Swiss Cottage
Hampstead
Kentish Town
Kilburn High Road
West Hampstead
<b>NEIGHBOURHOOD CENTRES</b>

There are 37 neighbourhood centres in the borough, which are identified on the Policies Map

#### SPECIALIST SHOPPING AREAS

Covent Garden

Denmark Street

Hatton Garden

Museum Street

Fitzrovia and south-west Bloomsbury

## Policy IE6 - Supporting town centres and high streets

- A.** The Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. The Council will:
- i.** seek to protect and enhance the role and distinctive character of each of Camden's centres, ensuring that new development is of an appropriate type, scale and character for the centre in which it is located, having regard to the 'network of centres' and their associated catchments;
  - ii.** support the provision of additional retail floorspace over the plan period, to provide for and maintain, a range of shopping opportunities, including top-up facilities to meet the essential needs of local communities and to enhance the offer of individual centres;
  - iii.** support other cultural, community, leisure and service-oriented uses where they positively contribute to the character and role of the centre in which they are located and provided this does not undermine the primary shopping area where there is one designated; or materially reduce access to other essential services used by the local community;
  - iv.** support the use of vacant/ under-utilised properties for temporary ('meanwhile') uses that will benefit a centre's vitality and viability;
  - v.** support proposals which would significantly change the role of an existing CAZ retail cluster or town centre, where this forms part of a comprehensive planned approach for the area. Where such strategies have been adopted by the Council, they will form a material consideration in planning decisions;
  - vi.** give priority to sustaining the existing role of neighbourhood centres and specialist shopping areas. The loss of Class E uses will be supported where there is evidence that the centre is in decline and struggling relative to other centres in Camden performing a similar role and function and where the proposed alternative use would help to reinforce the vitality and viability of the rest of the centre.
  - vii.** resist the loss of active ground floor uses visited by members of the public within all centres to ensure the vitality of the centre is retained;
  - viii.** seek to widen the range of evening and night-time economy uses where there are existing concentrations of these uses and where this would be beneficial for local residents and people working on night shifts;

### Smaller and affordable premises

- ix.** resist proposals involving the formation of larger units where this would harm the character or role of the centre, particularly where this would be

detrimental to the supply of low cost and affordable space and the centre has an established role in accommodating independent and specialist retail;

- x. expect major developments (2,500sqm or more) to include a proportion of smaller units, including floorspace available at a discount to market rents;
- xi. seek to retain shops outside of designated centres where they have an essential role in meeting the needs of local communities;

### **Design and environmental quality**

- xii. expect new frontages to be well-designed and respond to positive examples in the local street scene in terms of proportion and local impact. Excessively sized fascias and proliferation of signage/adverts will be resisted. Where historic shopfronts and features are present, the Council will expect these to be retained;
- xiii. secure contributions towards improving infrastructure, including environmental improvements, better walking, cycling and public transport and community safety measures;

### **Sequential approach**

- B. The Council will apply a sequential approach to the provision of main town centre uses outside of the designated town centres listed above to support the Borough's network of centres. These uses should be located within town centres. Only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations. In applying the sequential approach, we will consider the likelihood of suitable sites becoming available in designated centres or edge of centre locations within a reasonable period (i.e. the next 3 years).
- C. The Council will require an impact assessment for large development proposals (of 2,500sqm or more) that are not in accordance with the above approach and:
  - i. would be in an edge of centre or out of centre location; or
  - ii. would be in an existing centre and have the potential to have a harmful impact on other centres
- D. The Impact Assessment will be required to demonstrate that the proposal would not harm the vitality and viability of centres or the delivery of major planned investment.

### **Protecting the vitality and viability of centres**

- 9.79 The Council will protect and enhance the role and character of each of Camden's centres by assessing proposals against policy IE6 and having regard to the descriptions and planning objectives for individual centres set out in Camden Planning Guidance: Town centres and retail.
- 9.80 As part of our strategy for protecting town and neighbourhood centres and CAZ retail clusters, the Council has used its planning powers to introduce two 'Article 4 directions' to remove a permitted development right that allows uses within Class E (Commercial, Business and Service) to change to residential use without planning permission. This means that planning permission is again required for such changes of use, and the Council can assess proposals against our planning policies, including consideration of the impact on the centre.

- 9.81** Councils have much less ability to manage the mix of shopping and some food and drink uses in centres since the introduction of Use Class E brought together a wide range of uses. Changes between uses within Class E do not constitute development and therefore planning permission is no longer required. Where it is feasible to do so (e.g. redevelopment of existing premises), we may seek the provision of a particular type of Class E floorspace, for example where this is necessary to sustain the health of the centre.
- 9.82** The National Planning Policy Framework retains reference to councils' role in defining 'primary shopping areas', i.e. areas where retail development is concentrated. We will seek to designate these on our Policies Map where it is appropriate to do so to protect the vitality and viability of centres. This provides the ability to manage the over concentration of particular sui generis uses where this would be detrimental to a centre's established character or role. We will continue to apply our amenity and transport policies to ensure that certain uses do not result in unacceptable impacts arising from noise, odour, waste or from deliveries and servicing. Larger proposals will be steered to locations with good public transport accessibility.
- 9.83** The National Planning Policy Framework also advocates the use of the sequential test and impact assessments by councils to ensure that main town centre uses are provided in suitable locations. In Camden, this will apply to designated town centre boundaries. The approach is well-established and gives preference to "edge-of-centre" locations when suitable sites cannot be found within a designated centre boundary. Where an applicant identifies an edge of centre location, the Council will seek proposals that are well-related to existing uses in the centre.

### **Future floorspace needs**

- 9.84** The Council's Retail and High Streets Needs Assessment ('the Retail Study') has considered current capacity and future demand for retail uses. The Retail Study estimates requirements for additional convenience and comparison floorspace from 2023-2041 based on likely expenditure and population growth. It also envisages online spend remains high but will grow at a slower rate than in the recent past. The likely overall demand for additional convenience and comparison space is likely to be low over the plan period. The quantum is such that this need could be satisfied largely through the reoccupation of vacant units. There are also a number of sites where there is planning permission for retail floorspace, some of which are under construction. Implementation of these schemes would reduce this demand even further.
- 9.85** It is considered that CAZ retail clusters and designated town centres have the most capacity to support change and growth. The Council has prepared planning frameworks for the key areas where change is expected. The Local Plan's site allocations identify some sites where further retail and leisure uses are likely to be accommodated, often through mixed-use developments. This includes the provision of low-cost retail space as part of the planning consent for the 02 site in Finchley Road.
- 9.86** At a centre level, the Retail Study finds that some centres have a potential need for additional convenience and comparison floorspace, particularly towards the end of

the Plan period. The scale of need is such, it can be readily accommodated within the existing stock of floorspace.

## **The changing role of centres**

- 9.87** Many centres in Camden have a stable retail role and an established character. However, restructuring in the retail sector in particular and volatility in consumer spending underlines the need for centres to be able to adapt rapidly to change. Since the introduction of Class E, pubs and bars have been designated as sui generis – they can have a positive role and successfully integrate with a centre’s existing role. However, there may be a need to limit their proliferation in primary shopping areas where these uses would have unacceptable impacts on surrounding uses, the appeal of the centre or residential populations.
- 9.88** When vacancies arise in centres, particularly outside of the primary shopping area or in neighbourhood centres, this can provide an opportunity to include new uses and activities that benefit local communities, especially where start-ups, entrepreneurs and voluntary and community sector / third sector organisations can struggle to secure premises at rents they can afford. Examples include affordable workspace, circular economy uses (such as repair shops), artist studios and cultural activities. The Council will support the reuse of premises as ‘meanwhile uses’ in line with Policy IE1. We will give priority to proposals that can demonstrate a social, cultural or economic development benefit.
- 9.89** Major changes in the role of existing CAZ retail clusters and town centres are not anticipated. The Council’s planning frameworks identify potential interventions that are consistent with the evolution of certain key centres in the Borough. Given the multi-faceted nature of centres and their importance to local communities, comprehensive area-based approaches are likely to be a necessary for managing changes involving multiple/larger sites.
- 9.90** Neighbourhood centres are much smaller in scale and mainly focussed on meeting the essential needs of local communities while specialist shopping areas are much more significant in terms of their visitor draw. The Retail Study identifies the individual role and mix of uses in these centres and finds they are functioning well. Changes in these centres are expected to be limited. Where proposals do come forward, they should contribute positively to the health of the rest of the centre.

## **Ground floor uses**

- 9.91** Key to the vitality and viability of centres is retaining a cohesive mix of uses at ground floor level. Where frontages become broken, it can impact on the appeal of a centre. While the Local Plan supports additional housing in centres, where shops, food and drink or other local services are converted to homes they are likely to stay in residential use permanently meaning their potential benefit for commercial or community functions is lost.
- 9.92** Ground and basement floors can be particularly exposed in terms of noise and disturbance and poor air quality due to their proximity to busy roads, junctions and transport infrastructure. We will therefore seek to retain active uses at ground



floor. These are considered uses visited by members of the public and related to the role of the designated centre. Exceptions will be allowed for affordable workspace where this addresses long-term vacancy of a unit.

### **Evening and night time economy**

- 9.93** The Council is preparing an Evening and Night Time Economy Strategy that will look at ways of increasing the social and economic benefits arising from evening and night-time activity. The broadest mix of uses are focussed within Camden's part of the West End and in Camden Town. This includes important cultural and performance spaces.
- 9.94** The emerging strategy has a focus on widening participation in the evening economy as a means of achieving both social and economic benefits. Local surveys suggest that older residents, women and some of our most easily ignored communities can feel excluded or have concerns about personal safety. There is also under-provision of attractions oriented towards families.
- 9.95** The range of activities/uses tends to be much more limited with night shift workers reporting difficulties in accessing even basic services. Where our planning powers allow, we will support efforts to increase the diversity of evening and night-time uses, having regard to the impacts on local residents and existing venues.

### **Smaller premises**

- 9.96** The Council will seek the retention of smaller premises in centres where these form an established part of the centre's character and the premises has a potential economic role, and where a specific local need is identified in a neighbourhood plan. We will take into account the availability of smaller premises elsewhere in the centre and in other centres nearby. For large major schemes, we will expect the applicant to consider the provision of smaller units, including discounted workspace to ensure businesses of all sizes have access to suitable space.
- 9.97** Class E means it is harder to ensure the protection of small, standalone convenience stores (sometimes 'corner shops') as it is possible to change to some non-retail uses without planning permission. As part of the Retail Study, we have reviewed the role of a number of smaller non-designated parades and considered whether there is justification for them being designated as a neighbourhood centre (or included as part of an existing designation where appropriate).

### **Design and environmental quality**

- 9.98** In line with the Local Plan's design policies, we expect new premises to respond creatively to their context. New shopfronts will be expected to respond closely to the prevailing scale, form, proportions and materials. In some centres, the frontages have a marked uniformity, with fine examples of shops and services being created on the ground floors of town houses and mansion blocks. Where historic shopfronts positively contribute to local character, they should be retained. In line with the approach for ground floors, active frontages will be sought as these add interest and vitality where passers-by are able to see into the building and provide safety through 'eyes on the street'.

- 9.99** The quality of the environment and its accessibility can have a significant impact on how well a centre performs. The Council will expect developments to contribute to local infrastructure projects, proportionate to the scale and impact of the scheme. It is expected that centres will continue to be a focus for efforts to improve active forms of travel and create greener, healthier places.

## Hot Food Takeaways

- 9.100** In common with the situation nationally, there are concerns about the high and increasing levels of overweight and obesity in Camden. Among children aged 5 in reception year, one in five is overweight or obese, rising to one in three in some areas. On average by the time children start secondary school, one in three children is overweight or obese (with 46% of children in one area). Childhood overweight and obesity are associated with physical and mental health conditions. Children that are overweight or obese are likely to remain so into adulthood, with a greater risk of poor health and wellbeing as a result. Over time, family eating habits have changed, with a greater proportion of meals being prepared outside the home. Marketing of high calorie food and drink has been subject to few restrictions.
- 9.101** The National Planning Policy Framework states that policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, including having access to healthy food. In planning for the local community's needs, councils are expected to give regard to local health strategies and should aim to improve health for all sections of the community. The London Plan seeks to create a healthier food environment within the context of reducing health inequalities overall, increase the availability of healthy food and restrict unhealthy options. It states that boroughs should manage clusters of retail uses having regard to their positive and negative impact on the objectives of the London Plan, including mental and physical health and wellbeing.
- 9.102** The Council will apply an approach to managing hot food takeaways based on local evidence and data. This has been developed in conjunction with local public health officers.

## Policy IE7 - Hot food takeaways

- A.** To minimise harm to health and wellbeing the Council will resist new hot food takeaways where they would be located within 400 metres of the entrance/ exit of an existing or proposed primary or secondary school or within the same distance of a sensitive use.
- B.** Elsewhere in the borough, where hot food takeaways are proposed the applicant will be required to demonstrate through a health impact assessment that it will not impact on existing health needs and levels of overweight and obesity in the area. We will resist proposals which would increase the total number of hot food takeaways within a designated centre above the 2022 baseline.

- 9.103** It is considered that the approach set out in the London Plan is relevant to Camden's circumstances and is necessary to address concerns about the

consumption of high calorie fast food. The Council's data shows there are already high concentrations of hot food takeaways in some centres, including in proximity to schools. There also tend to be higher numbers of takeaways in areas with higher proportions of children experiencing weight issues. It is acknowledged the policy is only able to prevent the further proliferation of hot food takeaways as part of a wider set of actions to promote healthy lifestyles. This includes the Local Plan's support for increased access to nutritious and affordable food through community food growing and a range of initiatives being undertaken by others beyond planning. 400 metres is a distance considered to be equivalent to a 5-minute walk.

- 9.104** Our approach extends the London Plan's approach to other sensitive uses such as youth clubs and children's play areas. When applied, the 400 metres buffer covers most of Camden's centres with few exceptions, which include a large part of the Fitzrovia specialist area. This area has a strong evening economy with a growing food and drink offer. It is considered necessary to have a limit on the proportion of these uses outside of the buffer due to their impacts on public health. New takeaways will be supported but should not result in their total number exceeding that recorded at the time of the Council's 2022 Camden Retail survey. Where new hot food takeaways are proposed we will also seek a Health Impact Assessment. As part of this, the applicant should consider the role of healthier menu options.

## Gambling uses

- 9.105** Gambling can be a source of serious harm to individuals, families and communities, with the most socio-economically disadvantaged groups experiencing the highest levels of problem gambling and the greatest proportions of residents at risk of harm. Gambling can negatively affect the physical and psychological health of people who gamble, and affect the wellbeing of those around them. The risk of gambling increases with higher levels of deprivation, with the number and density of gambling premises being the greatest in these areas.
- 9.106** The Council will seek to limit further concentrations of gambling related uses due to the likelihood of gambling-related harm. These uses include betting shops/ bookmakers, adult gaming centres and casinos. We are taking a data-driven approach resisting further openings of these uses based on where the relative risks of problem gambling are highest.

## Policy IE8 - Gambling uses

- A.** New gambling-related uses will be resisted in the Central Activities Zone and the town centres of Camden Town; Kentish Town; Finchley Road/ Swiss Cottage; Kilburn High Road and West Hampstead. We will also resist extensions of existing gambling-related uses.
- B.** Gambling related uses are not considered to be suitable uses within Specialist shopping areas.
- C.** In all other centres, the Council will also resist proposals which would increase the total number of gambling uses within a designated centre above the 2022 baseline.

- 9.107** The Council has mapped gambling-related harm based on a variety of place-based factors including age, ethnicity, mental health and use of gambling treatment. This shows that the areas of greatest vulnerability to gambling-related harm are in the South of the Borough and areas within or near to designated town centres. This corresponds to where there are the greatest number of gambling uses, with the highest concentration in Camden Town town centre.
- 9.108** Siting new gambling premises in these areas would increase the risk of gambling-related harm for communities living in these areas. Resisting planning applications for gambling premises, including extensions to existing facilities, is necessary to reduce the likelihood of even greater harm arising from these uses.
- 9.109** Gambling uses are also present in other designated centres. Many neighbourhood centres are small and serve an important role in providing access to essential services, including food/ convenience shopping. Concentrations of gambling premises in these centres will be resisted within the limits set by the policy. Such uses are also not considered to be appropriate in any Specialist Shopping Areas due to their defined role. Baseline numbers of gambling-related uses will be taken from the 2022 Camden Retail survey data.

## Delivery-led food businesses

- 9.110** There has recently been a significant rise in the demand for sites to provide delivery-led food businesses or 'dark kitchens': standalone food preparation facilities for cafes, restaurants and takeaways whose food is delivered directly to the consumer. These are generally internet-based services and are popular due to their perceived convenience and rapid delivery times.
- 9.111** While there are potential sustainability benefits from consolidating and delivering multiple orders, the intensive activity associated with their use can cause significant levels of disturbance for their immediate neighbours due to noise and odour. There can also be safety issues associated with the frequency of delivery vehicles movements involved.
- 9.112** Policy IE9 seeks to ensure that the impact of delivery-led food businesses is effectively managed.

## Policy IE9 - Delivery-led food businesses

- A.** The Council will only permit proposals for delivery-led food businesses ('dark kitchens') where:
- i.** there will be no unacceptable adverse impacts on neighbours or the local area from the premises or from delivery vehicles and staff;
  - ii.** vehicle movements are minimised, and sustainable transport practices have been adopted with priority given to bicycles and cargo bikes. The Council may set limits on the number of vehicle movements and hours of operation; and
  - iii.** the premises will operate in accordance with an approved Travel Plan and Delivery and Servicing Management Plan.

- 9.113** Given their impact on amenity new delivery-led food businesses should be avoided where they would be in proximity to residential uses. Promoters of 'dark

kitchens' will be expected to demonstrate that they have undertaken a borough-wide search to identify premises where adverse impacts on the local community can be minimised. Larger employment sites are likely to provide the most suitable locations due to the greater ability to achieve separation from residential properties. The nature of these operations means there tend to be large number of vehicle movements which can create nuisance for nearby residents and the wider neighbourhood. Applicants will be expected to make commitments to use low emission and low noise vehicles, with preference for deliveries via bicycle where possible.

## Markets

- 9.114** Camden Town has an internationally renowned concentration of markets which are an important attraction for visitors and tourists and a defining part of the Borough's identity. Stalls selling goods to the public are complemented by a variety of leisure and entertainment uses. There are also eight street markets in Camden which can provide an important source of fresh food, often grown more locally than food from supermarkets. Markets can be important places of social and cultural exchange and in some cases help to meet the specialist food needs of ethnic communities. Markets can have an important role in the local supply chain by providing opportunities for local manufacturers and artists to sell products in a low-cost way. The policy approach focusses on the economic role of markets in supporting local entrepreneurship and the importance of markets in meeting the need of surrounding communities for goods and services, where gaps in provision exist. We will also seek to retain existing permanent market sites in the borough.

### Policy IE10 - Markets

- A.** The Council will promote and protect markets having regard to their distinctive social and economic character and role and ability to meet the needs of the local community and visitors. The Council will:
- i.** consider how the proposals contribute to the character, role and functions of the existing market and the centre in which the scheme is located;
  - ii.** request applicants for any larger schemes directly impacting on a market (1,000sqm and above) to provide evidence of how the development contributes to a long-term vision for the market developed by the operator. The applicant will be required to demonstrate to the Council's satisfaction how the proposals will help to sustain the long-term success and viability of the core market use;
  - iii.** seek the provision of affordable retail space in the form of standalone units or market stalls. We will target a discount of up to 50% on benchmark rents in line with Policy IE4 on affordable workspace;
  - iv.** expect suitable proposals to improve the local community's access to essential goods and services;
  - v.** resist the permanent loss of market uses unless comparable replacement provision is made, or there it is demonstrated to the Council's satisfaction there is no demand for continued market use; and
  - vi.** support new markets that will not cause individual or cumulative harm to the local area.

- 9.115** Due to their prominent location and intensity of use, markets are often an important contributor to the vitality and viability of centres. Changes to markets

can affect their character and consequently the character and attraction of the centre. When assessing proposals, we will expect proposals to consider, and where appropriate, reflect this character. Within some centres, the Council has brought forward planning frameworks helping to guide multiple development proposals as part of an overall vision and objectives for managing change in a centre, including existing market sites. These frameworks form a material planning consideration.

- 9.116** Markets can perform multiple roles including access to healthy food, provision of a range of goods and providing opportunities for new businesses to establish. Where larger schemes would impact on market uses, the Council will expect the applicant to explain how this contributes to a long-term strategic approach for the market. The Council will seek to ensure that proposals contribute to the positive functions markets can have. We will seek affordable retail provision in line with the approach set out in Policy IE4.
- 9.117** The impact of a market on its local community varies according to its scale and appeal as a visitor attraction. Where any major developments are proposed within a market, we will expect the applicant to ensure increased provision of services for the local community, particularly where there is evidence of local residents travelling to other centres to meet basic needs.
- 9.118** All markets in Camden appear to be performing a valued function and therefore will be protected unless there is convincing evidence that the market is no longer required.
- 9.119** Alongside their benefits, markets can, when poorly designed or managed, cause harm to surrounding areas, for example in terms of congestion on footpaths and roads, litter, refuse storage and noise. Proposals within markets should therefore include provision for careful management and contribute to environmental and street improvements. Equipment should be stored in proximity to the site wherever possible.

# Supporting Camden's Communities



# Chapter 10: Supporting Camden's communities

- 10.1** In Camden, many people are living in poor health for many years of their lives and the gap in healthy life expectancy between the poorest and richest parts of the borough continues to widen. On average, those living in the most deprived areas spend 20 years of their life living in poor health and die around 10 years earlier than those living in the least deprived areas.
- 10.2** We know that health is intrinsically linked to early life experience, education, employment, housing, leisure, and the local environment – otherwise known as the social determinants of health. These are the social, cultural, economic and environmental factors that shape the conditions in which we live.
- 10.3** Planning can play a pivotal role in influencing key health determinants. This policy seeks to ensure that development in the borough considers local issues relating to health and wellbeing at an early stage of the planning process in order to positively improve outcomes for the people of Camden.

## Policy SC1: Improving health and wellbeing

- A.** The Council will continue to work closely with its partners to improve the physical and mental health and wellbeing of all people who live, work in, study in and visit Camden, and reduce health inequalities.
- B.** To support healthier communities and reduce health inequalities in Camden the Council will require development to:
- i.** Be designed to promote good health and wellbeing, minimise adverse impacts on health and wellbeing and reduce health inequalities;
  - ii.** Provide a healthy living and working environment;
  - iii.** Support healthy and active lifestyles;
  - iv.** Be safe and accessible for all;
  - v.** Promote social and economic inclusion;
  - vi.** Support the provision of new or improved health facilities, in line with the North Central London's Integrated Care System and NHS England's requirements; and
  - vii.** Be designed and constructed to meet the WELL Building Standard.
- C.** Health Impact Assessments must be undertaken for major applications and developments that the Council considers would have the potential to give rise to significant adverse health impacts.
- D.** Health Impact Assessments should be undertaken at an early stage and the results should be used to refine the design of a development, to maximise the positive impacts, and minimise and mitigate adverse impacts, on the health and wellbeing of both the existing and future population.

- 10.4** The Council's ambition is to make Camden the very best place to start well, live well and age well. To support this ambition the Council has produced the Camden Health and Wellbeing Strategy 2022 – 2030. The strategy sets out the



shared principles, long term ambitions and short term priorities of the Council for improving health and wellbeing and reducing health inequalities.

- 10.5** Central to the Council's strategy is the 'population health' approach, which seeks to improve physical and mental health, promote wellbeing and reduce health inequalities across an entire population. This approach focuses on the social determinants of health and wellbeing and highlights the importance of creating a collective sense of responsibility across organisations and within communities to reduce inequalities and promote good health.
- 10.6** The Local Plan has a significant role to play in delivering the Council's Health and Wellbeing Strategy. Health considerations are therefore integrated into all aspects of this Plan and many measures set out in other policies will play a part in promoting population health and wellbeing and addressing health inequalities, for example by:
- Promoting good quality, well designed, affordable and accessible housing (Policies D1, D3, H4 and H6) to reduce overcrowding, improve living conditions and support health and wellbeing.
  - Requiring developments to contribute to the mitigation of and adaption to climate change, to reduce the impact of extreme weather events such as flooding and heatwaves on health (Policies CC1 – CC13).
  - Ensuring that buildings and places are designed to promote healthy behaviours and be inclusive and accessible to support the needs of different groups in Camden (Policies DS1, D1 and SC1).
  - Protecting existing, and requiring the provision of new, social infrastructure to support communities, aid integration and reduce loneliness (Policy SC2).
  - Promoting healthy lifestyles, increased physical activity and improved mental health through the design of new development (Policies DS1, SC1 and D1), the protection of existing and provision of new and enhanced open space, play and sports facilities (Policies SC2 and SC3) and investment in active travel (Policies T1 and T2).
  - Ensuring that developments are designed to reduce crime and the fear of crime, and improve community safety (Policy A2)
  - Promoting a stronger local economy, recognising the links between income and health (Policy IE1)
  - Improving and creating better access to education, training and employment (Policy IE1)
  - Supporting healthy eating by improving access to healthier food choices and increasing opportunities for food growing (Policies SC4 and IE7)
  - Managing the impact of development on health (Policy SC1) and reducing exposure to poor air quality with the aim of improving health (Policy A3).

## **Development and Health**

- 10.7** The creation of healthy environments will be a key consideration for the Council when assessing planning applications and the Council will expect applicants to take into account the needs of different groups when designing schemes, to ensure they meet the needs of Camden's diverse communities and are inclusive and accessible.

- 10.8** New development has the potential to support significant improvements in health but can also have considerable adverse impacts on health if it is inappropriately located, designed, constructed and/or operated.
- 10.9** To ensure that development promotes and positively contributes to a healthy living environment in Camden, development will be expected to consider both positive and negative health impacts at an early stage, prior to the submission of a planning application, with actions to enhance positive impacts and mitigate negative impacts identified. Health Impact Assessments will be an important tool for this.
- 10.10** The Council will also expect new development to be designed and constructed to achieve the WELL Building Standard, a global rating system focussed on the ways that buildings, and everything in them, can improve comfort, drive better choices, and enhance health and wellness.

### **Health Impact Assessments**

- 10.11** A Health Impact Assessment (HIA) is a useful tool that helps to ensure that health and wellbeing is properly considered as part of the planning process. The scope of a HIA will vary depending on the size of the development and its location. A HIA should identify the likely health impacts of a development and include measures to improve health outcomes and address negative effects and inequalities.
- 10.12** Health Impact Assessments should be undertaken for all major applications. Major applications are regarded as developments of 10 or more homes (including student housing) or a non-residential development with a floorspace of 1,000sqm or more. For mixed use developments, major developments are regarded as a proportional combination of homes and non-residential floorspace. HIAs for developments of 100 homes or more, including student housing, will be expected to include details of the engagement they have undertaken with local health and community stakeholders in the community and how their input has influenced the development. Further information on HIA can be found in Camden Planning Guidance on amenity and the Mayor's Social Infrastructure supplementary planning document.
- 10.13** In addition to the above, Health Impact Assessments will also be required for developments considered to have the potential to give rise to significant adverse health impacts. A HIA will also be required for developments, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take aways, betting shops and in areas where air pollution and noise issues are particularly prevalent.
- 10.14** As part of the process of undertaking a Health Impact Assessment applicants will also be expected to consider the risk of suicide, particularly in relation to tall buildings and structures, in accordance with Policy A2 Safety and Security.

### **Health Facilities**

- 10.15** The North Central London Integrated Care System (NCL ICS) covers five boroughs; Camden, Islington, Barnet, Enfield and Haringey. It brings together local health and care organisations, local councils and the voluntary, community and social enterprise (VCSE) sector to work in joined-up ways to improve health outcomes

for residents and tackle inequalities that currently exist. Within the Integrated Care System an estates team is responsible for all NHS health care buildings and facilities and must be consulted on any proposals for new or replacement public health care buildings in Camden.

- 10.16** Policy DM1 Delivery and Monitoring and Appendix 1 sets out the infrastructure requirements for the borough over the Plan period, including many that relate to improving health.
- 10.17** Policy SC2 Social and Community Infrastructure specifically states that we will resist the loss of community facilities (which includes health facilities), unless a replacement facility that meets need is provided or where evidence demonstrates that the facility, or similar facility, is no longer required. We will also require contributions towards supporting existing or providing for new facilities from developments that result in additional need for community facilities, such as those for health. In assessing additional need, the Council and NHS partners will use the NHS London Healthy Urban Development Unit's Planning Contributions Model to assess the health service requirements and cost impacts of new residential developments.

## Social and Community Infrastructure

- 10.18** Social and community infrastructure can help to enhance quality of life and social cohesion, improve personal health and wellbeing, reduce social isolation, instil a sense of community identity and belonging, and help reduce crime and anti-social behaviour.
- 10.19** The term "social and community infrastructure" in this section refers to a wide range of infrastructure that provides a service to the community. This includes:
- childcare
  - education
  - adult learning and training
  - healthcare
  - emergency services including police stations
  - civic uses
  - youth provision
  - laundrettes
  - community halls and meeting places for the principal use of the local community
  - libraries
  - places of worship
  - play spaces
  - public toilets
  - indoor and outdoor sports and recreation facilities
  - public houses (see Policy C4 Public Houses)
  - cemeteries, crematoria and burial spaces
- 10.20** This list is not intended to be exhaustive however and other facilities may also be considered to comprise social and community infrastructure.
- 10.21** Policy SC2 sets out the Council's approach to the protection and provision of social and community infrastructure in Camden. A list of social and community

infrastructure projects to be delivered in Camden is set out in the Infrastructure Schedule in Appendix 1 of the Local Plan. Area and site-specific infrastructure needs are also set out in the area strategies and site allocation policies in the Plan, and in other Development Plan Documents, Neighbourhood Plans and Area Frameworks.

## Policy SC2 – Social and Community Infrastructure

- A. The Council will work with its partners to ensure that social and community infrastructure is developed and modernised to meet the changing needs of our community and support the delivery of services.

### Provision of new or improved Social and Community Infrastructure

- B. The Council will seek planning obligations to secure contributions towards new and improved social and community facilities and services to mitigate the impact of development.
- C. The Council will support the provision of new, improved and extended social and community infrastructure where proposals:
- i. meet the needs of the intended users and the local community, and promote community integration and inclusion;
  - ii. are designed to be safe, inclusive, welcoming and accessible for all;
  - iii. do not have an unacceptable impact on amenity;
  - iv. satisfactorily address the impacts of changes to the balance and mix of uses in the area, including the cumulative impact of schemes with planning permission or awaiting determination;
  - v. maximise opportunities for shared use and co-location of facilities, where practical;
  - vi. are accessible to the community it is intended to serve, by sustainable modes of travel;
  - vii. provide free, publicly accessible toilets, including Changing Places toilets where appropriate, baby change, Wi-Fi and drinking water facilities, where practical; and
  - viii. can demonstrate to the Council that funding arrangements are secured for the future maintenance and management of the facility.

### Protection of existing Social and Community Infrastructure

- D. To safeguard social and community infrastructure in Camden the Council will:
- i. Ensure existing social and community infrastructure is retained, recognising their benefit to the community, including protected groups, unless one of the following tests is met:
    - a. a replacement facility of a similar nature is provided or exists, that meets the needs of the local population, or its current, or intended, users;
    - b. the existing premises are no longer required, or viable, in their existing use and there is no alternative social or community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a social or community use, then our preferred alternative will be the maximum viable amount of affordable housing;

- ii. Take into account listing or nomination of 'Assets of Community Value' as a material planning consideration and encourage communities to nominate Assets of Community Value.

## **Meeting the need for community infrastructure**

- 10.22** It is important that new development does not place unacceptable pressure on existing community facilities and that there is sufficient provision to support new residents. It is also recognised that some community facilities serve a catchment extending outside the Borough boundary and that the needs of residents in adjoining boroughs will also need to be considered, where appropriate.
- 10.23** The Council will seek section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing community infrastructure and services is met. When using Section 106 agreements, the Council will take into account viability as a factor in determining the types of facilities or services that are required and the timeframe in which these can be delivered. We will also use the community infrastructure levy to fund community infrastructure and services where appropriate.

## **Provision of new, improved or extended social infrastructure**

### **Meeting the needs of the intended users and local community**

- 10.24** Providers of new, improved or extended social and community infrastructure are encouraged to engage early in the development process with ward members and local communities, including Neighbourhood Forums. This ensures that local people can meaningfully input into a scheme's development and that new provision meets the needs of the intended users and the wider community. It also promotes community inclusion. The process undertaken should be detailed in the Design and Access Statement accompanying the planning application.

### **Designed for all**

- 10.25** Where new floorspace is provided, applicants should submit plans showing the proposed design, layout and fit out as part of the planning application, unless the Council agrees that this is not required. Plans should demonstrate that the development achieves the highest practical standards of accessibility, safety and inclusion and provides a welcoming environment for all. For further information on accessibility and safety please see Policy D1 Design, Policy A2 Safety, and the Camden Planning Guidance on design and CPG on Access for All.
- 10.26** Some community facilities offer particular support and safe environments for protected groups and/or communities both in Camden and the wider area. However, it should also be acknowledged that a range of barriers exist which prevent protected groups and/or communities from accessing social and community infrastructure, for example sports and leisure facilities. Planning and design therefore have an important role in addressing these barriers and ensuring that new developments create environments that are welcoming, inclusive and accessible for all.

**10.27** Under the Equality Act 2010, the Council is required to assess the impact of policies against the 'protected characteristics' of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, sex/gender and sexual orientation. The Council will therefore expect proposals for new social and community infrastructure to take into account the needs of these protected groups as part of the design of the scheme, to ensure that the development meets the needs of all.

### Impact on amenity

**10.28** The scale and intensity of use of some social and community facilities can lead to adverse impacts on residential amenity. This is principally related to the movement of large numbers of people at certain times of day, which can give rise to impacts such as noise and air pollution and create pressure on the transport system. Proposals that would generate large numbers of people should be accompanied by a community use plan, detailing the use and a list of the activities proposed, for example services of worship, clubs and meetings, and the likely number of people attending, the number of staff, proposed hours of operation and any use management measures proposed.

### Balance and mix of uses in the area

**10.29** The Council will ensure schemes satisfactorily address the impacts of changes to the balance and mix of uses in the area, including the cumulative impact of schemes with planning permission or awaiting determination. Further guidance on managing impact on amenity is set out in Policy A1 and Camden Planning Guidance CPG on amenity. Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the 'school run'. The Council will refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase.

### Shared use and co-location of facilities

**10.30** To help sustain community facilities and improve access to them for Camden residents, the Council will expect applicants to fully assess opportunities to co-locate different services or activities in one site or premises. The Council will also seek opportunities to improve access to facilities through agreements allowing the shared use of a facility by the wider community or increased hours of community access where this is practical. A number of these arrangements already exist, e.g. schools allowing access to their premises out-of-hours or co-locating sports facilities with other services, such as Camden headquarters at 5 Pancras Square which accommodates Council offices, a leisure centre and a library. This provides a cost-effective, and sometimes the only viable, means of addressing deficiencies in provision and reduces the need to travel.

### Accessibility

**10.31** The Council will assess the accessibility of a new or extended facility for its intended users and community. Where a facility is anticipated to generate a large

number of visits, the Council would expect it to be provided within the Central Activities Zone or one of the borough's designated town centres.

## Facilities

- 10.32** To meet the needs of Camden's diverse communities, the Council will expect new, improved or extended social and community facilities, to, where practicable, provide free, publicly accessible toilets, including Changing Places toilets where appropriate, baby change facilities, Wi-Fi and drinking water.
- 10.33** Changing places toilets are larger than standard accessible toilets with extra features and more space to meet user's needs. Changing Places toilets give severely disabled people and their families the opportunity to visit public places which they otherwise would not be able to and can therefore make a significant difference to their quality of life.

## Maintenance and future funding

- 10.34** The sustainability of the funding arrangements for new community facilities, including maintenance and management, is a serious concern. The Council will seek assurances that floorspace will be used by community groups in perpetuity and will negotiate the provision of subsidised rents where this is necessary to ensure that a facility meets its intended needs. Where the Council is unable to enter into an agreement to meet the ongoing revenue costs of a facility itself, we will expect the applicant to demonstrate how the future of the facility will be secured.

## Safeguarding community facilities

- 10.35** Community facilities are vulnerable to pressure from uses which attract higher land values and once they are lost cannot easily be replaced. The Council will normally seek the retention of community facilities except in defined circumstances. This includes where there is suitable replacement provision secured through the use of a planning obligation. We will assess whether the accessibility of the replacement provision satisfactorily addresses the needs of the facility's users and how this addresses relevant plans or programmes of re-provision of public sector bodies. In exceptional cases, the Council may seek a financial contribution based on the cost of providing a replacement facility. The Council will expect that replacement facilities are sufficient in size and a high-quality design which facilitates the successful operation of the community use.
- 10.36** There may also be circumstances where a community use, either wholly or in part, is no longer required or viable in its current use. In this instance, the applicant will be expected to demonstrate to the Council's satisfaction that the loss of the facility would not create, or add to, a shortfall in provision for the existing community use and if it would not, that the facility is unable to address a need for any other community use in the local area. The Council may require marketing evidence to show that the premises have been offered at a reasonable charge to community groups or voluntary organisations. The Council has set out further details in Camden Planning Guidance on Community uses, leisure facilities and pubs. The loss of a facility may also be acceptable where this forms part of an asset

management strategy of a public or voluntary body and the loss is necessary to allow the service to continue operating successfully, for example where a facility is underused or no longer fit for purpose.

- 10.37** Where an alternative community use cannot be found for the existing facility, the Council will seek the provision of affordable housing as its preferred alternative use. Community facilities generally have a relatively low capital value compared with housing sites. We will seek the maximum reasonable amount of affordable housing in accordance with Policy H4 Maximising the supply of affordable housing, having regard to financial viability. We will expect the proportion of affordable housing to reflect the value of the development site in its former community use.

### **Laundrettes**

- 10.38** Laundrettes are a commercial operation but nevertheless perform an important community function. They are a sui generis use meaning that planning permission to alternative uses must be sought from the Council. Currently, there is a permitted development right allowing a change of use from a launderette to housing but to protect laundrettes, the Council has introduced an Article 4 direction removing this right so planning permission is still required.

- 10.39** There is a very small supply of laundrettes in the Borough which it is desirable to retain given their essential role in supporting people living in smaller and shared accommodation. We will expect applicants proposing the conversion of a launderette to show there has been a thorough search for an alternative launderette operator via marketing of the property. The Council will also request the applicant to provide evidence that the continuing operation of the launderette is no longer viable, including the provision of recent trading accounts for the existing launderette.

### **Assets of Community Value**

- 10.40** The Council supports communities wishing to nominate 'Assets of Community Value' (ACV). These are a building or piece of land which currently, or in the recent past, furthers the social wellbeing or cultural, recreational or sporting interests of the local community and is expected to do so in the future. The Council will formally register the asset if it meets statutory criteria. If it does, if and when the owner decides to sell the asset, a local group can trigger a six month moratorium on the sale giving them time to raise the funds to purchase it (sometimes referred to as a 'right to bid'). Owners have to consider community bids, but they do not have to accept them.

- 10.41** The Council, when determining planning applications involving loss of community facilities, will treat the listing of an Asset of Community Value as an indicator of local support and evidence that it furthers the social wellbeing and interests of residents.

### **Public Toilets**

- 10.42** Public toilets are a vital facility and are especially important for certain groups including disabled people, older people, people with babies and young children



and pregnant women. Access to public toilets gives people more confidence to move around the Borough and spend more time in a place or space.

- 10.43** The Local Plan safeguards public toilets as ‘social and community infrastructure’ in accordance with Policy SC2 – Social and Community Infrastructure.
- 10.44** The Local Plan promotes the provision of free, publicly accessible toilets suitable for a range of users in new or enhanced social and community infrastructure and open spaces, in accordance with Policy SC2 – Social and Community Infrastructure, Policy SC3 – Open Space and Policy D1 – Achieving Design Excellence.
- 10.45** The London Plan also requires large-scale development, defined as being those that are open to the public, and large areas of public realm, to provide and secure the future management of free publicly accessible toilets suitable for a range of users, and free ‘Changing Places’ toilets. The Council will therefore seek the provision of public toilets in accordance with the London Plan and have identified specific site allocations where public toilets will be sought.

## Open Space

- 10.46** Camden benefits from a wide range of public open spaces. These spaces perform an important environmental and social role: supporting biodiversity; helping to tackle the climate emergency; and providing a variety of areas in which to relax, socialise, connect, play, enjoy sport and take part in physical exercise, benefiting health and well-being, and reducing feelings of social isolation.
- 10.47** The term “public open space” in this section refers to open space that can be used and enjoyed by all the community. It is distinct from privately accessible open space such as private or communal gardens or balconies that do not ordinarily provide access for everyone. Public open space includes, but is not limited to:
- Green amenity spaces, such as formal or informal parks, squares, gardens or other landscaped areas, which could include areas of natural or semi-natural green spaces;
  - Active spaces, such as areas of grassed or artificial surfaces providing opportunities for sport and recreation;
  - Civic spaces;
  - Housing estate amenity areas;
  - Formal and informal areas of play;
  - Natural and semi-natural spaces, including areas formally recognised for their nature conservation value;
  - Historic cemeteries, churchyards and other burial spaces; and
  - Waterways
- 10.48** There are over 280 designated public and private spaces shown on the Local Plan Policies Map. Policy SC3 sets out the Council’s strategy for protecting existing and supporting the provision of new open spaces in Camden.

## Policy SC3 – Open Space

- A. The Council will protect, enhance and improve access to Camden’s high-quality public open spaces, to promote health and well-being, enhance biodiversity and make space for nature within Camden.

### Protection of open spaces

- B. To protect Camden’s open spaces the Council will:
- i. protect all designated public and private open spaces as shown on the Policies Map and in the accompanying schedule, unless equivalent or better provision of open space in terms of quality, quantity, and accessibility is provided within the local catchment area;
  - ii. safeguard open space on housing estates while allowing flexibility for the re-configuration of land uses. When assessing development proposals, we will take the following into account:
    - a. the effect of the proposed scheme on the size, siting and form of existing open space and the functions it performs;
    - b. whether the open space is replaced by equivalent or better provision in terms of quantity, quality and accessibility for residents; and
    - c. whether the public value of retaining the open space is outweighed by the benefits of the development for existing estate residents and the wider community, such as improvements to the quality and access of the open space.
  - iii. resist development that would be detrimental to the setting, use and enjoyment of designated open spaces;
  - iv. exceptionally, and where it meets a demonstrable need, support small-scale development on open space which is associated with the use of the land as open space and contributes to its use and enjoyment by the public;
  - v. conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets; and
  - vi. consider development for alternative sports and recreation provision, where the needs outweigh the loss and where this is supported by an up-to-date needs assessment.

### Provision of new and enhanced public open space

- C. To secure new and enhanced public open space and ensure that development does not put unacceptable pressure on the Borough’s network of public open spaces, the Council will:
- i. require developments that meet the thresholds set out in Table 8, to contribute to the provision of public open space in accordance with the following standards:
    - a. Residential (all types) - 9 sqm per occupier
    - b. Commercial development and higher education- 0.74 sqm per worker
    - c. Student accommodation - 9 sqm per single room and 18 sqm per double room, multiplied by a factor of 0.75
  - ii. give priority to securing new public open space on-site. Provision off-site, near to the development, will only be considered acceptable where it can be demonstrated to the Council’s satisfaction that provision on-site is not achievable;

- iii. seek developer contributions to deliver improvements to existing public open space using Section 106 agreements where an applicant can demonstrate to the Council's satisfaction that it is not feasible to provide public open space on-site, or off-site, in accordance with criteria (Cii). We will secure planning obligations to address the additional impact of proposed schemes on public open space taking into account the scale of the proposal, the number of future occupants and the land uses involved;
- iv. ensure developments seek opportunities for providing private amenity space;
- v. give priority to play facilities and the provision of amenity space which meets residents' needs where a development creates a need for different types of open space;
- vi. tackle deficiencies in public open space through enhancement measures; and
- vii. seek temporary provision of public open space where opportunities arise.

### **Design and management of public open space**

- D.** To ensure that new or enhanced public open space is designed and managed to a high standard the Council will:
- i. ensure that all new or enhanced public open space is designed, where appropriate, to:
    - a. support health and well-being and be safe, welcoming, inclusive and accessible for all;
    - b. be multi-functional;
    - c. connect to and integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity;
    - d. mitigate the impacts of climate change in relation to addressing overheating and managing flood risk in accordance with Policies CC8 Overheating and Cooling and Policy CC11 Flood Risk;
    - e. be adaptable to climate change and allow species migration while supporting native and priority species;
    - f. provide opportunities for physical activity and play;
    - g. provide free, publicly accessible toilets suitable for a range of users; and
    - h. provide opportunities for community food growing in accordance with Policy SC4;
  - ii. require developments that provide public open space to make provision for its long-term management and maintenance; and
  - iii. require major applications that include public open space to be accompanied by a detailed landscaping scheme and landscape management plan.

### **Protection of public and private open space and land on housing estates**

- 10.49** It is important that the Council protects the public and private open spaces designated on the Local Plan Policies Map, as well as areas of land on housing estates with the potential to be used as public open space. They are a limited resource and highly valued by the community. Camden's open space designations include outdoor sports provision, including playing fields and ancillary facilities, which the Council will seek to protect, maintain and enhance. The loss of an open space will only be acceptable where provision of equivalent, or better space, is made within an appropriate catchment area for the type of open space. Catchment distances are set out in Camden Planning Guidance on public open space.

- 10.50** Camden has many large housing estates with extensive areas of amenity land. These areas have generally not been formally designated as open space but constitute a potential resource for providing enhanced public or communal open space. The Council wishes to protect this land, while allowing for the reconfiguration of open space and other land uses across estates where significant public benefits have been demonstrated (for example provision of new homes, schools and other community benefits), in particular for residents of the estate. The Council will consider whether such schemes provide equivalent or better provision in terms of the quality and quantity of usable open space and secure improvements to the accessibility and range of uses. This can bring enhancements where land set within housing estates is of poor quality, badly arranged or offers limited value in terms of open space functions for which it can be used.
- 10.51** The success and viability of open spaces is closely linked to the scale, character and quality of the adjacent townscape and development. We will resist proposals which would affect the use and enjoyment of an open space through detrimental changes to its setting. This includes changes to the space's appearance or character, effects on the microclimate, levels of external light or noise pollution and overshadowing, overlooking or disruption to views in or out of the space.
- 10.52** When assessing proposals that would involve the loss of open space, it must be demonstrated to the Council's satisfaction there is an exceptional need for the development, and it is associated with the use of the land as open space. Any development should be the minimum necessary to address the identified need. We will resist proposals which would be detrimental to the amenity and character of the space or reduce the public's use and enjoyment of the open space and its setting. The Council will seek replacement provision elsewhere to compensate for the loss.
- 10.53** Extensions and alterations to existing buildings on open space should be proportionate to the size, including the volume, of the original building. Proposals seeking the change of use of an existing building should also be sensitive to the role and function performed by the open space. The poor quality of an open space will generally not be accepted as a reason for its partial development to fund improvements as, once built on, the open space is lost to the community for ever.

### **Open spaces with historic value**

- 10.54** Many of the borough's designated open spaces are located within Conservation Areas or are designated as heritage assets. This includes 'London Squares', which are protected for their leisure and recreational value by the London Squares Preservation Act 1931, and non-designated heritage assets identified on the Council's 'Local List' or through neighbourhood plans. Furthermore, 14 of the borough's open spaces are Parks and Gardens of Special Historic Interest – significant designed landscapes registered by Historic England.
- 10.55** Open spaces can positively contribute to a conservation area's character and the setting of heritage assets. The Council will have regard to conservation area appraisals and management plans, the National Heritage List for England, the Greater London Historic Environment Record (HER) and other appropriate sources when establishing the contribution made by open spaces to the historic environment.

**10.56** The Council will encourage the management of registered parks and gardens and London squares to maintain, and where appropriate, enhance their value and protect their setting. The Council will consult with Historic England over proposals affecting these parks and gardens. The Council will also encourage the restoration and management of registered parks and gardens and London squares to enhance their value, where appropriate and possible.

### Sports and Recreation

**10.57** The Council recognises that the need for sports and recreation provision can change over time. The Council will consider proposals for alternative provision of such uses where a need has been demonstrated to its satisfaction and this need outweighs the loss of the existing provision. The proposal will also be assessed taking into account its impact on the integrity of the open space and against other relevant policies.

### New and enhanced open space

**10.58** Development in the Borough will lead to increased use and pressure on our existing open spaces. The Local Plan therefore seeks to secure sufficient open space with the capacity to meet the additional demand arising from new development (including a change of use). The Council will seek on-site provision of open space from new developments wherever possible, particularly in areas identified to be deficient in open space.

**10.59** Developments will be required to contribute to the provision of public open space in accordance with the following standards:

**Table 8 – Open Space Standards**

Development type	Threshold	Public open space provision
Residential (all types)	11 or more additional dwellings or exceeds 1,000 sqm (gross internal area)	9 sqm per occupier*
Commercial development	Developments of over 1,000sqm of floorspace / or on a site with an area greater than 1 hectare that are likely to increase the working population of the borough. This will be applied to any employment use which falls within Use Classes E(c), E(g), B2 and B8.	0.74 sqm per worker*

Higher Education	Developments of over 1,000sqm of floorspace / or on a site with an area greater than 1 hectare of floorspace for Higher Education institutions will be treated on a case-by-case basis. There will be a presumption that these developments make a contribution towards the needs they generate.	0.74 sqm per worker*
Student accommodation	Student housing schemes creating an additional 11 or more units/rooms or occupiers	9 sqm per single room and 18 sqm per double room, multiplied by a factor of 0.75

- 10.60** Further guidance for this is set out in the Camden Planning Guidance on Public Open Space.
- 10.61** Where it is demonstrated to the Council's satisfaction that on-site provision is not possible, the Council will seek other forms of open space contribution, giving preference to off-site provision which is capable of meeting the needs generated by the development. This includes securing public access to existing open spaces; potential sites include land around housing estates and large private spaces. The Council will seek Section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing open spaces is met. Where the Council negotiates a planning obligation, we will apply the standards set out in criterion C(i) in Policy SC3.
- 10.62** Where new open space is provided, it should take into account the characteristics of the site and the local context. This includes existing street patterns and pedestrian routes. The open space should be easy to use by people of all ages and consider the particular barriers that can be experienced by people with physical and sensory impairments and must be safe and secure for everyone. An important consideration will be the long-term ability for a space, including landscaping, planting, street furniture and surfaces, to be managed effectively and with demands minimised on natural resources, where relevant.
- 10.63** In densely developed areas, we will consider use of a financial contribution to create usable spaces within the public realm, for example through the widening of pavements, as this can be an effective means of achieving a range of environmental and quality of life benefits. These measures may also contribute to the implementation of conservation area management plans, e.g. the installation of sympathetic lighting or restoration of pavement materials.
- 10.64** Provision for outdoor sports facilities will also be sought within the overall requirement of 9 sqm per residential occupier where an opportunity for provision arises. Where a development provides public facilities for outdoor sports this can contribute to the 9sqm standard, subject to a balanced mix of public open space being provided.

- 10.65** Furthermore, where a development generates a need, the Council will give priority to securing suitable provision of play space for children and young people and an appropriate level of amenity space for the occupiers of a development. Play space provision will be expected to comply with the London Plan standards and designed to be welcoming, safe, accessible and inclusive for a range of ages and needs, in particular disabled and neurodiverse users.
- 10.66** Camden Planning Guidance on open space provides further detail on how financial contributions for open space provision will be calculated for individual schemes. It also sets out our requirements in relation to the maintenance of open spaces.

### **Tackling open space deficiencies**

- 10.67** The Camden Open Space, Sports and Recreation Study (2014) shows the continuing presence of a number of 'deficiency areas' in the Borough where the local population is farther than 280m (or a 5 minute walk) from a designated public open space. There are particularly large areas of open space deficiency in the west of the borough and in Gospel Oak. The Council's Community Investment Programme is helping to address this through improving access to high quality open spaces. There are also deficiencies in the south of the borough where it will be very difficult to create new areas of formal open space although there will still be opportunities for green and brown walls, roof gardens or public realm improvements.
- 10.68** The Open Space Study maps the areas that do not meet standards for different types of open space (parks, children's play areas, allotments, and outdoor sports pitches). The Study advises that deficiency areas should be applied flexibly because they do not take into account local demographics and population density. Nevertheless, the Council considers the deficiency areas to represent a reasonable starting point for identifying where future on-site provision should be prioritised. The Open Space Study sets out a range of measures across seven sub-areas which could potentially address the issues relating to the supply of open space.
- 10.69** The allocations in this Local Plan identify sites where there are opportunities for incorporating new public open space. The Fitzrovia Area Action Plan and Euston Area Plan also identify how access to open space can be improved in association with development in these areas.

### **Temporary provision of open space**

- 10.70** Sites awaiting development can sometimes make short term contributions to open space provision. We will strongly support the temporary use of cleared sites for public open space during the construction period where this can meet local needs. Such sites provide a potential location for local food growing projects (see Policy SC4 Food Growing below).

### **Design and management of public open space**

- 10.71** Where a development creates new or enhanced public open space, the Council will expect this to be designed and managed in accordance with Policy SC3 above, having regard to other policies in the Plan including Policy D1 Achieving Design Excellence, Policy SC2 Social and Community Infrastructure; Policy A3 Safety and

Security, Policy NE3 Trees, Policy NE2 biodiversity and Policy SC4 community food growing.

- 10.72** Where developments provide a contribution towards public open space (either on-site or off-site), the Council will need to be satisfied that it will be properly laid out and completed and that suitable contractual arrangements for its long-term management and maintenance have been put in place. Therefore, the Council will expect applicants to submit a draft management plan that can be secured through the S106 agreement. Camden's Public Open Space CPG sets out further guidance on what details would be expected to be set out in a management plan.
- 10.73** All major applications that include external space must be accompanied by a detailed scheme for landscaping which should include proposals for long-term maintenance and landscape management, which will be secured by condition upon approval and/or legal agreement.

## Food Growing

- 10.74** Domestic and community food growing has many benefits, including improving the sustainability of food production, increasing access to healthier food, providing opportunities for healthy outdoor activity, and enhancing Camden's network of green spaces. Food growing can also enable socialisation and the learning of new skills, having a positive impact on the health and wellbeing of residents. Encouraging and enabling more residents to grow food is an integral component of the Council's food mission, which aims to ensure that everyone in Camden eats well every day with nutritious, affordable and sustainable food.

## Policy SC4 – Food Growing

- A.** The Council will support food growing and community food growing in Camden to ensure that residents have access to nutritious, affordable and sustainable food. The Council will:
- i.** Protect existing allotments and community gardens for food growing;
  - ii.** Seek to secure the provision of suitable space for on-site food growing by residents as part of all major housing and mixed use developments (incorporating housing). As a guide we will seek the provision of approximately 0.9sqm per person. Where provision cannot be made on-site, a financial contribution will be sought to deliver off-site community food growing projects;
  - iii.** Encourage commercial developments to include provision for local food growing;
  - iv.** Utilise incidental open space on housing estates and other open space areas for community food growing, where this does not conflict with other policy objectives or land use priorities;
  - v.** Support the temporary use of vacant or under-utilised sites in the borough for community gardening and food growing projects provided the scale and nature of the activity would not have an unacceptable impact on the amenity of adjoining areas arising from the scale and nature of the activity through noise, disturbance or noxious smells; and
  - vi.** Encourage developments to include landscaping that includes plants and trees that produce fruit, nuts or seeds.



- 10.75** Housing developments and mixed use developments incorporating housing should seek to create and include flexible space that is suitable for food growing. As a guide we will seek the provision of approximately 0.9sqm per person, based on the occupancy of the proposed development. The inclusion of food growing opportunities in new developments should extend beyond the conventional provision of gardens and allotments to include the creative use of roofs, walls and balconies where external space is limited; the provision of community gardens; and landscaping that includes plants and trees that produce fruit, nuts or seeds rather than ornamental trees and shrubs. Where provision cannot be made on-site, a financial contribution will be sought to deliver off-site community food growing projects. Furthermore, where applicable, the Council will also encourage commercial developments in Camden to include provision for local food growing, for example through the use of basements or roof spaces for urban farms.
- 10.76** Wherever food growing space is included in a development, consideration should be given to issues such as exposure to the elements; drainage; soil quality, contamination and depth; solar orientation and overshadowing; water supply and the appropriateness of species planted to ensure suitable conditions are present for its meaningful use by residents.
- 10.77** In some cases initiatives such as the use of incidental open space on housing estates for food growing may not require planning permission. This would depend on its scale and form, and the extent to which it would change the character and function of the open space. The acceptability of such proposals would also depend on the impact on the availability of open space for general amenity use by residents.
- 10.78** Green roofs also provide opportunities for food growing, if structurally suitable, and can accommodate both growing beds and greenhouses. Local food growing spaces should incorporate sustainable landscape principles and practices, including effective water management, efficient energy use and use of sustainable materials.
- 10.79** Where provided, the identified space for food growing will be secured through planning condition or section106 agreement.

## Cultural Facilities

- 10.80** Cultural facilities, such as museums, theatres, galleries, cinemas, live music, comedy, and dance contribute enormously to Camden's attractiveness as a place to live, visit, work and study. They have significant value for education and learning and many of these facilities are linked to the wider development of Camden's large sector of creative industries. The presence of a strong and diverse cultural offer is a draw for investment from businesses and organisations seeking a location in a dynamic and creative environment. They also contribute to the quality of life of residents and some facilities are significant draws for visitors and tourists. Indirectly, they create wider economic benefits for hospitality and retail uses.
- 10.81** The opportunities for people of all ages to enjoy and participate in cultural activities can have a significant bearing on their ability to fulfil their individual and collective creative potential and provide connection with others. They are also important in terms of developing a sense of belonging, pride in place and

the representation of local cultures. For some residents, these facilities provide a pathway into employment and a long-term career.

**10.82** Cultural facilities in Camden are clustered in both the West End and Camden Town. The area of 'Theatreland' in Camden includes cinemas, theatres and night-time venues. Camden Town has long had a vibrant evening and night-time economy, particularly live music, with iconic venues including The Roundhouse, Koko and The Jazz Cafe. Significant cultural venues beyond Central London and Camden Town include The Kiln Theatre, Camden Arts Centre, JW3, Hampstead Theatre, The Forum and Scala. Examples of smaller spaces are The Horse Hospital in Bloomsbury, The Camden People's Theatre and Akademi. Camden's cultural offer includes a wealth of original, experimental and alternative programming, providing representation for diverse voices and narratives.

**10.83** Policy SC5 sets out the Council's strategy for supporting cultural facilities in Camden.

## Policy SC5 – Cultural Facilities

### Supporting cultural facilities

**A.** The Council will protect and support the enhancement of cultural facilities and manage the impact of adjoining uses applying the Agent of Change principle. The Council will support redevelopment, enabling redevelopment or relocation where this is essential for the retention of a cultural facility in the Borough.

### New cultural provision

- B.** New and expanded cultural facilities will be supported in accordance with the following approach:
- i.** Large-scale facilities should be located in the Central Activities Zone or Camden Town.
  - ii.** Smaller facilities would be appropriate anywhere in the Borough providing there is not an adverse impact on the surrounding area or the local community. This includes demonstrating to the Council's satisfaction that any impacts on the highways network or public transport would be acceptable.
  - iii.** The provision of new and expanded cultural facilities will be expected to reflect Camden's history, culture and diversity.
- C.** In any proposal offering a new or relocated cultural facility or additional floorspace, the Council may require the applicant to provide the following:
- i.** An assessment of potential impacts on the continuing operation of existing cultural facilities nearby;
  - ii.** Evidence demonstrating how the proposal contributes to the delivery of local arts and culture strategies; and
  - iii.** Details of shared use / daytime use of the facility by other cultural or community organisations, including on a temporary / 'meanwhile' basis.

## Community arts projects

- D.** The Council will in appropriate circumstances secure section 106 contributions to help fund community arts projects linked to the regeneration of centres and estates.

- 10.84** Cultural facilities are vitally important for their social and economic roles and contribution towards making Camden an attractive and vibrant place to live. However, because of differences in land values, they can be placed under pressure for conversion to other land uses, not through a lack of demand for the existing cultural use. We will therefore seek to retain cultural facilities unless there is evidence that can demonstrate to the Council's satisfaction that there is no prospect of the space supporting a cultural use. We will also seek to protect supporting facilities where they are linked to the successful operation of venues, for example small studios, rehearsal rooms or equipment stores.
- 10.85** Exceptionally, there may be justification for relocating a facility to an alternative location in the Borough. Where this is proposed, the Council will request evidence showing how this would impact on users of the facility. It is recognised that the long-term use of premises for specific cultural uses underpins the significance of heritage assets. Where this applies, the retention of the existing cultural use at its current premises will be the Council's preferred option. Where proposals impact on existing cultural uses, the Council will ensure that their function and role is not diminished or put at risk by any of the proposed changes.
- 10.86** New provision will be supported according to the scale and impact of the scheme. Large facilities (2,500sqm or more) should be provided in suitable locations in the CAZ where there are existing concentrations of evening and night-time uses or in Camden Town. Smaller facilities may be appropriate anywhere subject to the impacts on neighbouring uses being shown to be acceptable. The Council will resist proposals where they give rise to significant impacts on residential amenity, for example where a facility is likely to be visited by large numbers of people.
- 10.87** Traditionally, public art contributions have been secured for permanent art to add to an area's distinctive character, to create visual interest to commemorate people and events. This remains a relevant and legitimate use of developer contributions and contributions through applying the Local Plan's policies on design. However, community arts projects have recently been developed to support wider town centre renewal and estate regeneration. These projects involve local artists and arts and cultural providers, sometimes involving multiple sites in an area. They can also be delivered through partnerships with schools and organisations working with young adults, the elderly or disabled people. Given the multiple benefits for communities including learning and skills opportunities, direct participation and the impact on wellbeing, the Council may seek section 106 contributions in relevant circumstances.

## Public Houses

- 10.88** Public houses (pubs) play an important community and cultural role. As places where members of the community meet and gather, they support social wellbeing

and strengthen community cohesion. They sometimes provide important community meeting space and host local meetings, events and entertainment. Some pubs also support Camden's social diversity by providing a valuable support function for vulnerable or easier to ignore groups.

- 10.89** In some areas, the community pub provides a hub for socialising with friends, making new contacts, exchanging ideas, celebrating important occasions and staging large gatherings including live music, theatre and comedy nights. Some of the most interesting and unique pubs attract customers from a wide catchment area and may be important in terms of their tourism value or to a protected group defined under the Equality Act 2010.
- 10.90** Many pubs contribute to local culture and identity, and this is often closely related to a pub's long-standing presence in the street scene. The closure of a pub can lead to the loss of an area's vibrancy as well as its diversity and interest. Some pubs are important because they are heritage assets and architecturally distinguished.
- 10.91** Pubs also have an important economic function in contributing to the vitality of town or neighbourhood centres. Pubs support local employment and entrepreneurship, provide valuable work experience for young people and support jobs in the wider economy through the pub supply chain.
- 10.92** National planning policy recognises that public houses, along with other community facilities, enhance the sustainability of local communities and should be safeguarded and retained for the benefit of the community while allowing them to develop and modernise in a sustainable way. They are a 'sui generis' use meaning there is the ability to manage changes of use (e.g., to shops or residential) through the assessment of planning applications.
- 10.93** A related issue is the loss of part of an operating pub, such as beer gardens and ancillary residential accommodation. This can raise concerns about the impact of such changes on the pub's character and continuing ability to operate successfully. The Council will consider the effects of such changes in sustaining a viable pub.

## Policy SC6 - Public Houses

- A.** The Council will seek to protect public houses which are of community, heritage or townscape value.
- B.** The Council will not grant planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless it is demonstrated to the Council's satisfaction that:
- i.** the proposal would not result in the loss of pubs which are valued by the community (including protected groups) unless there are equivalent premises available capable of meeting the community's needs served by the public house; or
  - ii.** there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term;
- C.** Where a public house is converted to an alternative use, the Council will seek the retention of significant features of historic or character value.

- D.** Applications involving the loss of pub floorspace, including facilities ancillary to the operation of the public house, will be resisted where this will adversely affect the operation of the public house.
- E.** Where it has been demonstrated to the Council's satisfaction that a public house can no longer be retained, the suitability of the premises for alternative community uses for which there is a defined need in the locality should be assessed before other uses are considered. If the pub is a heritage asset, it should be conserved in a manner appropriate to its heritage significance.
- F.** The Council will support the provision of new public houses in appropriate sites in the South of the Borough and town centres, subject to other policies in this Plan.

### **Protection of valued pubs**

- 10.94** The Council will seek to protect pubs that are important to the local community. This reflects the sentiments of the National Planning Policy Framework (NPPF) which urges Local Planning Authorities to plan positively for the provision and use of public houses and guard against the unnecessary loss of valued facilities.
- 10.95** Policy SC6 allows flexibility by supporting development where it would not be contrary to the interests of the economy, historic environment or community. The overall aim is to ensure that the Council is able to protect all of its public houses which provide a significant benefit or value to the local community, including access to range of facilities; that public houses of historic and cultural value are conserved and enhanced according to their significance; and that the vibrancy and vitality of Camden's centres and local economies are sustained.
- 10.96** The Council will determine whether a proposal would result in the loss of a pub with community, cultural or heritage value. A 'community pub' predominantly serves a local residential community or a 'protected group' (for example the Lesbian, Gay, Bisexual and Transgender communities) which may have a catchment wider than the local area. There may exceptionally be a justification for protecting a pub which does not meet this criterion if it is the last facility capable of meeting the local community's needs and could conceivably do so in the medium term.
- 10.97** It is important that the local community have a say in whether pubs are protected. The Council may require an applicant to fund a survey to establish the views of the community, including members of protected groups where appropriate, on the loss of the public house. The methodology and content of the survey would need to be agreed in writing by the Council and be funded by the applicant. If a pub is registered as an Asset of Community Value, a survey will not be required to demonstrate to the Council the community value of a pub.
- 10.98** Where the proposed development would result in the loss of a valued pub, the Council will require evidence setting out alternative public house provision in the local area or for the community, including information on the location, size, range and quality of facilities, taking account of any unimplemented planning permissions for the addition or loss of public houses. The availability of alternative premises will only be considered where they meet equivalent needs of the community, such as performance spaces, meeting rooms or a beer garden. The

loss of a pub cannot be overcome by the availability of other public houses if it leads to the loss of pub facilities or services of particular value to the community.

- 10.99** The Council will also require applicants to fund a marketing exercise to demonstrate whether there is a demand for the pub at a realistic rent or freehold value which is 'free of tie'. The Council will expect a mounted sales/letting board to be provided throughout the marketing period to draw the community's attention to the marketing exercise. At the applicant's expense, the Council will require a qualified licensed leisure chartered surveyor independent of the selling agent to confirm that the rental and freehold value of the pub used in the marketing exercise is reasonable. Further details about the marketing exercise are set out in Camden Planning Guidance on Community uses, leisure and pubs.
- 10.100** The Council will require applicants to demonstrate to the Council's satisfaction there is no reasonable prospect of a pub being able to trade from the existing premises in the medium term. We will require details including rents, turnover figures and other factors relevant to a pub's viability including the style of operation, hours of opening, supply of food and availability of meeting and event rooms. Applicants should set out what operating models have been used to help sustain or improve the pub's potential. Details about viability assessment for pubs are set out in the Camden Planning Guidance document highlighted above.
- 10.101** Many pubs are valued for their architectural interest, historic fabric and contribution to the character and townscape value of the local area, for example through their distinctive signage, windows or fittings. They can also support local arts and culture providing low-cost performance space. Pub gardens can be particularly valued for providing communal open space in the built-up area. A significant number of pubs in Camden have been recognised as Assets of Community Value, which provides the community with an opportunity to raise funds to make a bid to acquire the designated asset. Where the Council is satisfied that it is no longer possible for a public house use to be found for the premises, we will seek the retention of significant features which contribute to the building's character and heritage value.

### **Partial loss of a public house**

- 10.102** The partial loss of a pub and ancillary facilities may be detrimental to its character, community value or future viability. Outdoor amenity spaces, gardens, cellars and parking areas attached to pubs can also be subject to pressures for residential development. These changes can lead to a pub becoming less profitable and as a consequence, more vulnerable to further redevelopment, potentially leading to a pub being lost altogether. In determining whether the loss of floorspace is acceptable, the Council will take into account the effect of changes to the pub's layout and reduction in its trading area on its continuing ability to operate successfully. We will expect landlords/ operators to consider suitable complementary uses that enable the continued successful operation of the pub, such as Bed and Breakfast accommodation.

**10.103** In some cases, the introduction of sensitive uses, such as permanent residential accommodation, will be subject to the 'Agent of Change' principle. This means that the Council will expect the applicant to consider how the existing pub operates (e.g. its licensing terms, the use of outdoor areas etc.) when mitigation measures are being designed. The onus will be on the applicant to ensure that a non-ancillary use does not lead to pressure for the pub to materially alter its operations. The full costs of the mitigation will need to be borne by the applicant.

# The Natural Environment





# Chapter 11: The Natural Environment

- 11.1** Recent years have shown the important role that access to open space and nature can play in improving physical and mental health, wellbeing, and happiness. There is also greater emphasis now on the role that trees, plants and greenery can play in keeping our air clean, tackling surface water flooding, cooling our neighbourhoods and helping to tackle the climate emergency.
- 11.2** Camden benefits from a rich and diverse natural environment and has a wide range of open spaces including parks, natural or semi-natural green spaces, housing estate amenity areas, playgrounds, historic cemeteries, churchyards, allotments, community gardens, outdoor sports facilities and the Regent's Canal. These spaces, together with street trees, soft landscaping, roof gardens, and green/brown roofs and walls form a network of 'green infrastructure' in the borough.
- 11.3** The Council's biodiversity strategy 'Creating Space for Nature in Camden' sets out the Council's ambitions for protecting and enhancing nature and biodiversity in the borough, to ensure that Camden is a place where nature and wildlife can thrive and where residents, visitors and workers have the opportunity to access and enjoy nature. It is the first part of an ecological plan for the borough, developed in response to the declaration of a climate and ecological emergency by the Council and will be supported by the establishment of a Local Nature Recovery Network and the development of a Green Infrastructure Strategy.

## Policy NE1 – The Natural Environment

- A.** The Council will conserve and enhance Camden's natural environment. The Council will:
- i.** Protect and enhance the network of open spaces and local green spaces across the borough in accordance with Policy SC3 Open Space;
  - ii.** Give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);
  - iii.** Designate and protect nature conservation sites (including the Ancient Woodland on Hampstead Heath) and other features of biodiversity value, such as Sites of Importance for Nature Conservation, corridors and stepping-stones in accordance with NE2 Biodiversity;
  - iv.** Support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;
  - v.** v. Protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;
  - vi.** Preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath;
  - vii.** Work with partners to preserve and enhance the Regent's Canal, including its setting, and balance the differing demands on the Canal and its towpath;
  - viii.** Require all development to enhance biodiversity in line with Policy NE2 Biodiversity;
  - ix.** Protect trees in Camden and seek to secure additional trees in accordance with Policy NE3 Tree Planting and Protection;

- x. Secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;
- xi. Encourage the delivery of highways greening measures in accordance with Policy T1 Safe, Healthy and Sustainable Transport;
- xii. Require multi-functional Sustainable Urban Drainage Systems (SuDs) to be provided in accordance with Policy CC12 Sustainable Drainage;
- xiii. Seek to improve opportunities for residents and the public to access and engage with nature, particularly in areas where such opportunities are lacking; and
- xiv. Seek contributions from development to the delivery of the priorities and projects set out in the Local Nature Recovery Strategy, Camden Biodiversity Strategy and Camden Green Infrastructure Strategy.

**11.4** Policy NE1 supports the Council's ambitions for creating space for nature in Camden by ensuring that development in Camden conserves and enhances Camden's natural environment, in response to the climate and ecological emergency. This policy should be read in conjunction with Policy SC3 Open Space; Policy SC4 Food Growing; Policy NE2 Biodiversity; Policy NE3 Tree Planting and Protection; Policy D1 Achieving Design Excellence; and Policy T1 Safe, Healthy and Sustainable Transport, which together set out the Council's approach to the Natural Environment.

### **Designated Sites**

**11.5** Camden has a number of designated open spaces, which are identified on the Local Plan Policies Map. These open spaces include areas of Metropolitan Open Land. This is open space of London-wide significance that provides a break in the built up area and receives the same presumption against development as green belt land. There are four main areas of Metropolitan Open Land in Camden, which are of great importance to the borough and its character – Hampstead Heath and adjoining areas, Regent's Park, Primrose Hill/Barrow Hill Reservoir and Highgate Cemetery/Waterlow Park/Fairseat. We will protect the openness and character of these spaces in accordance with London Plan policy and policy guidance in the National Planning Policy Framework (NPPF) on Green Belts.

**11.6** A significant number of open spaces in Camden are also designated for their nature conservation importance. Designated open spaces of nature conservation interest are shown on the Local Plan Policies Map. Taken together, these sites occupy some 414 ha of land. They are as follows:

- Hampstead Heath Woods Site of Special Scientific Interest (SSSI), which is Camden's only SSSI. SSSIs are designated by Natural England due to their nationally important habitats and species and/or geological features and must be given the highest protection in accordance with legislation.
- 39 Sites of Importance for Nature Conservation (SINC): As part of the evidence base for the Local Plan, LB Camden commissioned the London Wildlife Trust to undertake a review of these sites. This resulted in a number of boundary changes and the identification of 4 new SINCs which are reflected on the Policies Map.
- 4 designated Local Nature Reserves (LNR) which host a rich variety of flora and fauna – Adelaide, Belsize Woods, Westbere Copse (all managed by LB Camden) and Camley Street Natural Park (managed by London Wildlife Trust). They are statutory designation and afforded protection.

- 11.7** Camden's SINC's and LNRs represent some of the most significant concentrations of habitat and species in the Borough. They are widely distributed and have an essential role in providing local access to nature. Most SINC's are not in the Council's control and therefore it is difficult for the Council to protect species, habitats and foraging areas which are not formally protected by international and national legislation. We will, however, seek to protect these locally designated nature conservation sites from inappropriate and harmful development. This includes resisting the development of designated sites where the nature conservation value has been diminished or lost through neglect or damage as it is possible for the habitat to be restored.
- 11.8** This policy, in tandem with Policy SC3 Open Space and Policy NE2 Biodiversity ensures the safeguarding of these sites.

### **Local Green Spaces**

- 11.9** The NPPF introduced the concept of a Local Green Spaces designation. This is green space where development is ruled out other than in very special circumstances. A Local Green Space should be within reasonably close proximity to the community it serves, be demonstrably special to a local community and hold particular local significance, be local in character and not form an extensive tract of land. The Local Plan seeks to protect existing local green spaces and the Council is supporting Neighbourhood Forums in identifying further local green spaces through neighbourhood plans.

### **Protection of other undeveloped areas including gardens**

- 11.10** Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area. The Council will protect such spaces in accordance with the National Planning Policy Framework. Gardens help shape their local area, provide a setting for buildings, provide visual interest and often support natural habitats. Therefore, they can be an important element in the character and identity of an area (its 'sense of place') and its biodiversity. We will resist development that occupies an excessive part of the garden, and the loss of garden space which contributes to the character of the townscape. Part of the established character of these spaces may also be defined through features such as railings and garden walls. We will seek the retention of these features where they make a positive contribution to townscape value.
- 11.11** We will seek the retention of important views and glimpses of green space where these have been identified in a conservation area appraisal or development brief, particularly where schemes are unable to meet the requirement to provide public open space on-site, to enhance the amenity of residents and occupants. Spaces above rooflines, gaps between buildings and even small, sometimes isolated pockets of amenity space, can be vital in supporting the notion of openness, provide visual interest, soften the built environment and contribute to wellbeing. These views may also help to define the significance of heritage assets.

### **Key open spaces in Camden**

- 11.12** Hampstead Heath is the largest open space in the Borough providing nearly half of our total area of open space and many of our outdoor sporting facilities. The

Council will work with partners, including the City of London (who own and manage the Heath), to ensure it is properly safeguarded. There are numerous large private gardens adjacent to the Heath that are designated as open space. We will continue using guidance in conservation area appraisals and management strategies to preserve and enhance the built environment around the Heath and preserve outlooks and views from it. This includes protected views from Kenwood House and Parliament Hill to St. Paul's and from Parliament Hill to the Palace of Westminster.

- 11.13** The Regent's Canal is Camden's only significant open watercourse and winds through the borough from Regent's Park to King's Cross. It is an important historical feature and development near the Canal will be expected to reflect its unique character. We will take into account the Regent's Canal Conservation Area Appraisal and Management Strategy when assessing applications for sites along and adjacent to the Canal. Other issues relevant to development proposals include increasing demands on the towpath by pedestrians and cyclists, the potential for crime and anti-social behaviour due to the canal's relative isolation and importance of retaining dark, unlit land in sustaining habitats and species, particularly the foraging of bats. The Canal is designated as a site of metropolitan importance for nature conservation and there is considerable scope to improve biodiversity along the Canal through planting, the provision of green or brown roofs and green walls.

### **Increasing opportunities to experience nature**

- 11.14** A key objective of the Council's Biodiversity Strategy is to increase engagement with nature. There are typically lower levels of active engagement in more deprived areas of the borough. This is partly related to the limited spatial extent of natural habitat in these locations, where nature conservation sites are generally quite small, with parts of the west, east and south of the borough having the lowest coverage. In some cases, access to nature conservation sites is restricted in order to safeguard their nature conservation interest. The Council will need to give particular priority to addressing deficiencies in the areas identified in the 2014 Open Space Study as being deficient in access to open space.
- 11.15** Of particular social benefit to the borough are Local Nature Reserves. They support a variety of learning and community based activity, and it is important to protect and maximise their value. By raising awareness of our links, and dependence on the environment, these sites can foster an interest in the stewardship of natural habitats.

### **Enhancing our natural environment**

- 11.16** Development coming forward in Camden will be expected to enhance the borough's natural environment, through the provision of new green infrastructure and enhancements to existing in accordance with the policies in the Plan, particularly those relating to open space, biodiversity, trees, highways and design. The Council will also look to secure contributions, through Section 106, to enhance links between open spaces in the borough, to improve access for recreation, and create corridors which allow species to move between habitats.
- 11.17** To support the objectives set out in the Biodiversity Strategy, the Council is also in the process of preparing a Local Nature Recovery Strategy and Green Infrastructure Strategy. These documents will set out key priorities for the borough

and include projects to help deliver these. Development in Camden will be expected to support the delivery of these strategies once adopted.

- 11.18** Further guidance on the provision of open space and trees is set out in the Council's Camden Planning Guidance.

## Biodiversity

- 11.19** Nature provides us with a variety of environmental, social, cultural, education, health and recreation benefits. However, in recent times it has become increasingly apparent that biodiversity in the UK is declining. Given this, the Council declared an ecological emergency in 2019 with the aim of protecting and supporting habitats and species in Camden to reverse their decline.
- 11.20** Furthermore, the Environment Act 2021 introduced a requirement for developments to deliver a minimum 10% biodiversity net gain above the ecological baseline for an application site. In Camden, roof gardens and sustainable drainage systems will in many cases have particular potential for delivering net gains in biodiversity on site, whilst offering benefits for residents such as cooling and flood protection. The Environment Act also introduced Local Nature Recovery Strategies which will guide the delivery of biodiversity net gain projects. The Council's emerging Nature Recovery Network (a network of designated and non-designated wildlife sites and corridors for wildlife) and Neighbourhood Plans map the opportunities where routes for wildlife can be improved or designated sites buffered through extending biodiverse planting and landscaping.
- 11.21** The implementation of these initiatives will ensure that all new development contributes towards the delivery of net gains in biodiversity, so that the natural environment, across Camden, is improved by the end of the Local Plan period. Financial contributions sought under Policy SC3 (Open Space) will also be used to contribute towards new planting and measures to support species.

## Policy NE2 - Biodiversity

- A.** The Council will seek to ensure that development protects and enhances nature conservation and biodiversity in the Borough. The Council will:
- i.** Safeguard protected and priority habitats and species, Sites of Importance for Nature Conservation (SINC) and other features of biodiversity value such as wildlife corridors and stepping stones;
  - ii.** Require all major schemes, and those that have the potential to impact biodiversity and designated sites, to prepare a baseline ecological assessment, and demonstrate how any impacts on biodiversity can be avoided or mitigated and establish how biodiversity enhancements will be maximized. Where mitigation measures are proposed these should be delivered on-site, unless it can be demonstrated to the Council's satisfaction that this isn't achievable;
  - iii.** Address the potential of both direct and indirect impacts on habitats and species, from factors such as shading, light pollution and risk of disturbance and expect development to follow the mitigation hierarchy with regards to these impacts (avoiding impacts where possible; where this is not feasible seek to mitigate impact; and only where the impact is not capable of being avoided or mitigated, seek compensation for the loss/harm);

- iv. Resist development where it is likely to worsen deficiencies in access to natural greenspace;
- v. v. Expect development to realise benefits for biodiversity through their layout, design and the materials used in their built and landscaping elements, taking account of the local ecological context, strategic and local opportunities for biodiversity gains identified in the Council's Biodiversity Strategy and emerging Nature Recovery Network, neighbourhood plans and Local Plan site allocations;
- vi. Require biodiversity net gain of at least 10% on eligible sites, with preference given for on-site or near site solutions. The net gains will be secured for a period of at least 30 years;
- vii. Recognise the biodiversity value offered by gardens;
- viii. Seek biodiversity enhancements commensurate with the scale of proposed residential and non-residential extensions and alterations, including the provision of biodiverse green roofs and species features such as bird and bat boxes; and
- ix. Secure long-term management plans and monitoring of schemes, where appropriate, to ensure that nature conservation objectives are met. We will also expect Construction Management Plans to provide information on how habitats will be protected during building work, where appropriate.

**11.22** Under the provisions of the Environment Act 2021 Local Authorities have the duty to conserve and enhance biodiversity and report on actions taken. The Council's Biodiversity Strategy sets out the Council's ambitions for protecting and enhancing nature and biodiversity in the borough and the Local Plan provides the framework through which the Council can deliver this.

### **Habitats and species**

**11.23** Camden's green spaces and built environment support habitats and species protected under UK and international legislation. Their presence is a material planning consideration. Priority habitats and species are those most threatened and in need of conservation action in the UK and will be afforded protection when assessing planning applications. There are also Sites of Importance for Nature Conservation which are graded into four categories according to their spatial significance and quality and designated Local Nature Reserves providing opportunities for communities to access and engage with nature and wildlife corridors of various scales. Areas of non-designated habitat may also be important in providing space for wildlife to shelter, find food and move through the landscape (which are small patches of natural habitat).

### **Protecting biodiversity**

**11.24** The Council will require all major schemes, and those that have the potential to impact biodiversity and designated sites, to prepare a baseline ecological assessment. The ecological assessment should establish the site's ecological characteristics (baseline), assess the proposal's impacts and identify opportunities for mitigation and enhancement. As part this, consideration should be given to the presence of habitats and species in proximity to the site and whether the site has a 'buffering' role (i.e. managing disturbance from human activity on an identified habitat). The Council will expect developments to demonstrate how

habitats providing multiple functions (for example, flower-rich grassland in public open space) can be maintained in target condition. Survey findings should be shared in an appropriate format with the London Environmental Records Centre: Greenspace Information for Greater London. Further guidance on ecological assessments, including the level and scope of detail required and the times in which they should be carried out is set out in our Camden Planning Guidance on biodiversity.

- 11.25** Where development is proposed that will indirectly impact on biodiversity through noise, light, shading, inappropriate planting and increased human presence, the Council will require appropriate mitigation measures to be provided. Where external lighting is provided in the grounds of domestic properties, illumination solely for a design benefit (e.g. uplighters in trees) should generally be avoided and an appropriate colour temperature used for the location. Schemes will also be resisted where there would be a detrimental impact on the local community's ability to enjoy access to nature. We will be guided by mapping of existing deficiencies in access to nature greenspace.

### **Enhancing biodiversity**

- 11.26** Developers of any major scheme will be expected to demonstrate that biodiversity has been fully integrated into the design and development of their scheme from an early stage. The Council will seek enhancements with priority given to delivering these on-site. The layout and type of habitats should take into account the site's role in buffering and connecting nature sites and wildlife corridors. As a benchmark, 50% of total planting should be native species and 50% species of recognised value to biodiversity, such as those on the Royal Horticultural Society's 'Plants for Pollinators' list.
- 11.27** Local sites alone are insufficient to sustain a thriving local ecosystem. The Camden Biodiversity Strategy highlights the essential need for wildlife to be able to move between areas to find food, shelter and a mate. This emphasises the need to develop and expand networks of corridors and 'stepping stones' to facilitate this. Neighbourhood forums and other residents groups have already been active in investigating what opportunities exist for improving networks in their areas.
- 11.28** At both London and borough level, Nature Recovery Networks are being developed through engagement with partners. These will provide a basis for making informed decisions on what to do for nature and help to prioritise where this is likely to have the greatest benefit. The Local Plan's site allocations identify opportunities for biodiversity enhancement on certain key sites.

### **Biodiversity Net Gain**

- 11.29** The Government is expected to introduce 'Biodiversity Net Gain' as a national scheme in England in 2024. It is based on a 'metric-driven' approach and is intended to be a mandatory requirement. While it is to be delivered through the planning system, it sits outside of normal 'planning balance' considerations. Central to its operation is the idea of relative change, i.e. the difference between the value of habitats on-site prior to development and the value of the habitats on-site (or off-site) after development has been completed. Biodiversity Net Gain (BNG), as set out in the Environment Act, requires developments that fall within this legislation

to provide a minimum 10% net gain in biodiversity. Other elements of this policy will also apply to these developments, including providing greater than 10% biodiversity gain where appropriate to the scale and opportunities provided by that development. BNG proposals will be expected to reflect local priorities. Existing tools such as the London Plan's Urban Greening Factors will also help to deliver biodiversity gains in the Borough.

## Protecting gardens

- 11.30** The Council recognises that gardens are a vital contributor to the biodiversity of the Borough. How private gardens are planted and managed is the responsibility of individual homeowners. Through the planning process, we will resist the excessive loss of garden space recognising its value as a biodiversity resource, including its potential to deliver greater biodiversity value in the future. We will seek to negotiate the restoration of front gardens to improve biodiversity value through the Local Plan's policy on car-free development and where this would positively contribute to the significance of heritage assets, including conservation areas.

## Retrofitting

- 11.31** Many development sites in Camden are already fully built on. Therefore, we will seek to negotiate biodiverse green roofs in all suitable developments and 'features' such as bird and bat boxes/artificial bat roosts subject to impacts on heritage assets and amenity. Improvements to the public realm also provide opportunities to include features for biodiversity such as street plants and pocket parks providing space for nature and places for people.

## Management and monitoring

- 11.32** Once a development has been completed, management and monitoring of habitats may be required. Management plans are used to ensure areas with nature conservation value are retained and reach their full potential by having effective maintenance arrangements in place. Monitoring is used to confirm that relevant environmental measures are being implemented successfully.
- 11.33** The demolition and construction process can also pose a significant risk to habitats and species, including green corridors. Given this, the Council will request a construction management plan for developments adjoining or within sites of high nature conservation value in order to protect biodiversity.

## Tree Planting and Protection

- 11.34** Tree planting is recognised as an important way of reducing carbon emissions through carbon storage. Furthermore, trees provide habitats for wildlife and are important for their visual amenity. Woodland and individual trees can help to maintain air quality, provide shade, aid water attenuation, help to preserve soils and increase biodiversity. They can act as stepping-stones for wildlife throughout the landscape and provide important wildlife corridors within the urban environment. Trees can also make places more attractive and cohesive, encourage increased use of walking and cycling routes and contribute to greater health and well-being.



**11.35** The National Planning Policy Framework acknowledges the important contribution that trees make to the mitigation of and adaptation to the effects of climate change, as well as to the character and quality of urban environments. It requires that existing trees are retained wherever possible and that opportunities are taken to incorporate trees in new developments, including through the creation of tree-lined streets and the introduction of measures such as community orchards.

**11.36** The Council's Tree Planting Strategy sets out our ambitions to increase tree canopy cover in the borough through the planting of at least 600 trees per year over the period to 2025. Policy NE3 below supports the delivery of the Council's Tree Strategy and sets out our approach to tree planting and protection in Camden.

## **Policy NE3 – Tree Planting and Protection**

- A.** The Council will seek to protect existing trees and secure additional tree planting in the borough. The Council will:
- i.** resist the loss of a tree, group of trees, area of woodland and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. The Council will also resist proposals which may threaten the continued wellbeing of such trees as specified above;
  - ii.** make Tree Preservation Orders (TPO's) when necessary to protect specific trees, groups of trees, or woodlands, in the interests of amenity and biodiversity;
  - iii.** ensure that where trees are to be retained on developments, these are positively integrated into the design and layout of the proposed scheme;
  - iv.** require trees and vegetation, that are to be retained, to be satisfactorily protected both during and following the demolition and construction phase of development, in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction';
  - v.** require replacement trees and/or vegetation to be provided where the loss or harm to the wellbeing of significant trees and/or vegetation has been justified in the context of the proposed development;
  - vi.** prioritise securing replacement trees and vegetation on-site. Where it can be demonstrated to the Council's satisfaction that replacement trees and vegetation cannot be provided on-site, a financial contribution will be secured to enable the planting and subsequent maintenance of replacement trees and vegetation off-site;
  - vii.** require developments to incorporate additional trees and vegetation wherever possible, as part of a detailed landscaping scheme for the site. A detailed landscaping scheme and landscape management plan must be submitted for all major developments, including, but not limited to, details of the trees and vegetation to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development.

### **Tree protection**

**11.37** The Council will seek the retention of trees and vegetation of significant amenity, historic, cultural or ecological value. This includes trees within the public highway and on adjacent land to development sites which can potentially be affected by a proposed development. Trees and vegetation are important to the contribution that a site and its setting make to townscape character, and amenity, and have

a sense of maturity which may often be lacking from replacement planting. Ancient woodland and ancient or veteran trees found outside ancient woodland are particularly valuable, as once lost they can never be replaced. The ancient woodland in Camden forms part of the Hampstead Woods Site of Special Scientific Interest (SSSI).

- 11.38** Applicants will be required to take measures, to the Council's satisfaction, to minimise any adverse impacts from development on retained and proposed trees and vegetation as far as possible. This includes the potential risk of damage arising from demolition or construction works, and development, which fails to allow sufficient space above and below ground to prevent damage to root systems or facilitate future growth.
- 11.39** All design elements of a development should be arranged to ensure a good relationship between the development and trees to be retained and planted, to ensure new planting has space to develop and mature, and existing trees continue to grow and flourish, without causing harmful nuisance for the occupants of the scheme or surrounding community.
- 11.40** Camden Planning Guidance on design sets out the information required by the Council to ensure that there is a systematic approach to the safeguarding of trees and vegetation within the development site and on adjacent land (including street trees) both during and following the construction process. The Council will expect developers to follow the principles and practice set out in 'British Standard 5837:2012 (or as subsequently updated) Trees in relation to design, demolition and construction - Recommendations'.

### **Tree Preservation Orders**

- 11.41** Many trees in the Borough are covered by a Tree Preservation Order (TPO). A Tree Preservation Order is made by the Council to legally protect a specific tree or group of trees that provide public amenity or are of cultural or historic significance. The principal effect of a TPO is to prohibit the cutting down, uprooting, topping, lopping, wilful damage, or wilful destruction of trees without consent.
- 11.42** As part of the consideration of a planning application the Council will consider whether a TPO is needed. Members of the public can also draw the Council's attention to trees or groups of trees they consider to be important to the area and suitable for a TPO.
- 11.43** Works to trees with a TPO, above or below ground, require the Council's permission. Works to a tree with a TPO that is needed to enable the implementation of a planning permission are dealt with as part of a planning application. The Council can also require existing trees, including those that are not the subject of a Tree Preservation Order, to be protected and retained, using planning conditions. The Council also has powers to use 'conditional TPOs' which can be applied prior to planting.

### **Replacement trees**

- 11.44** Where the felling of either protected or significant trees has been demonstrated to be unavoidable, the Council will seek replacement planting on-site of an

appropriate size, number and species in an appropriate location. There will be occasions where it may not be possible for trees – or trees providing the same amenity or biodiversity benefits – to be replaced on-site because of the footprint of proposed new buildings. It will always be the Council’s priority for any significant trees lost to be replaced within the curtilage of the development.

**11.45** Where it demonstrated to the Council’s satisfaction that this is not feasible, we will expect equivalent benefits to those provided by existing trees and vegetation to be secured. This will be achieved through securing a commuted sum where the cost of replacement planting is calculated according to its CAVAT (Capital Asset Value for Amenity Trees) value. This is a way of calculating the value of trees in monetary terms and is a widely used approach to ensure that realistic replacement and / or compensation is provided. The CAVAT value allows for contributions, positive and negative, of the tree’s location, relative contribution to amenity value (including the numbers of people that interact with the tree) and appropriateness, as well as functionality and life expectancy. The basic value is modified by a consideration of the impact of these factors to determine the quantum of general amenity benefit. Applicants may be required to fund independent inspection and valuation of trees to establish CAVAT values.

**11.46** The Council will use these commuted sums to fund tree planting in the immediate area where this is possible through the planting of trees on Council owned land such as highways, parks, housing estates and nature reserves. The funding may also be used to deliver tree planting on other large private developments in the local area. This funding will be expected to cover maintenance costs, and will be secured by a S106 agreement.

## **Tree planting**

**11.47** Section 197 of the Town and Country Planning Act 1990 places a duty on the Local Planning Authority to secure the planting of new trees. Camden’s Tree Planting Strategy 2020-2025 aims to increase canopy cover in Camden by a minimum of 3.7% by 2045. This will partly be delivered by increasing planting on private land, and by helping developers and residents to make informed choices in relation to the planting of trees. Applicants should seek opportunities to restore and enhance planting throughout the site as part of their landscaping scheme. The Council will take a ‘right tree for the right place’ approach with the aim of delivering an attractive treed environment with age and species diversification. This will also ensure that trees have the optimum conditions for establishment and longevity for future generations to enjoy. The landscaping or planting scheme should take into account the impact of trees when they are fully grown and provide sufficient replacement trees to mitigate the loss of canopy cover where appropriate.

**11.48** There are a range of factors that applicants should be aware of when considering new tree planting, including:

- The amenity value of any trees to be removed.
- Ecology – the Council will expect new trees and vegetation to increase the biodiversity value of the site.
- Historic context – trees should take account of the existing qualities of the site and complement the surrounding architecture and the historic landscape character, recognising the evolution and use of the site, the local character and important views.

- Availability of space – this should take account of both Root Protection Areas and buffer zones, as identified by the Tree Constraints Plan and Arboricultural Impact Assessment. The impact of different tree species on buildings above and below ground and ancillary structures, such as boundary walls, should be considered. The planting plan will be required to also consider the potential for trees, over their lifetime, to give rise to unacceptable loss of light to habitable rooms and consider necessary clearances for CCTV, street lighting and overhead cables and high/large vehicles. Trees should be planted in positions which permit a tree to grow to maturity without inhibition of form.
- Soil conditions including hydrogeology – ensuring there is sufficient soil volume, the right soil type and drainage in order that roots can grow and function properly.
- Potential for improvements to air and soil quality.
- Adapting to climate change – taking opportunities to improve a site/area’s sustainability and function. Applicants should also consider the ability of trees/vegetation to withstand drought and extreme weather, and changes in the prevalence of pathogens.
- Long-term resource consumption - the level of input required for the management and maintenance of trees and the effect this has on lifespan.
- Advice in BS 8545 Trees: from nursery to independence in the landscape – Recommendations.

**11.49** The Council will expect a detailed landscaping scheme for all major developments, as set out in Camden’s ‘Local Area Requirements’. Further guidance on what a landscaping scheme should include is set out in Camden Planning Guidance for Trees. The Council will secure a planting plan or landscaping scheme through a Section 106 agreement. Information on Camden’s wider tree population is set out in Open Data [[hyperlink: Camden Tree Statistics](#)] and will be a useful resource for applicants to inform planting schemes.

### **Tree maintenance**

**11.50** It is important that there is a robust management regime for newly planted trees and landscaping schemes to ensure that trees and vegetation are able to reach maturity and deliver maximum benefits and functions over their life course. Maintenance requirements and method of aftercare management should be considered during the design stage (e.g. ensuring there is access for maintenance, storage of materials on-site and availability of sources of water). This will also ensure that the overall sustainability of the planting scheme is acceptable, and that trees and vegetation do not become a nuisance.

**11.51** The Council will expect the detailed landscaping scheme or planting plan to include a landscape management plan. This will ensure that all planting on site is sustainable and adequately maintained in line with BS8545 for sufficient duration. This will be secured by a planning condition or in a Section 106 agreement.

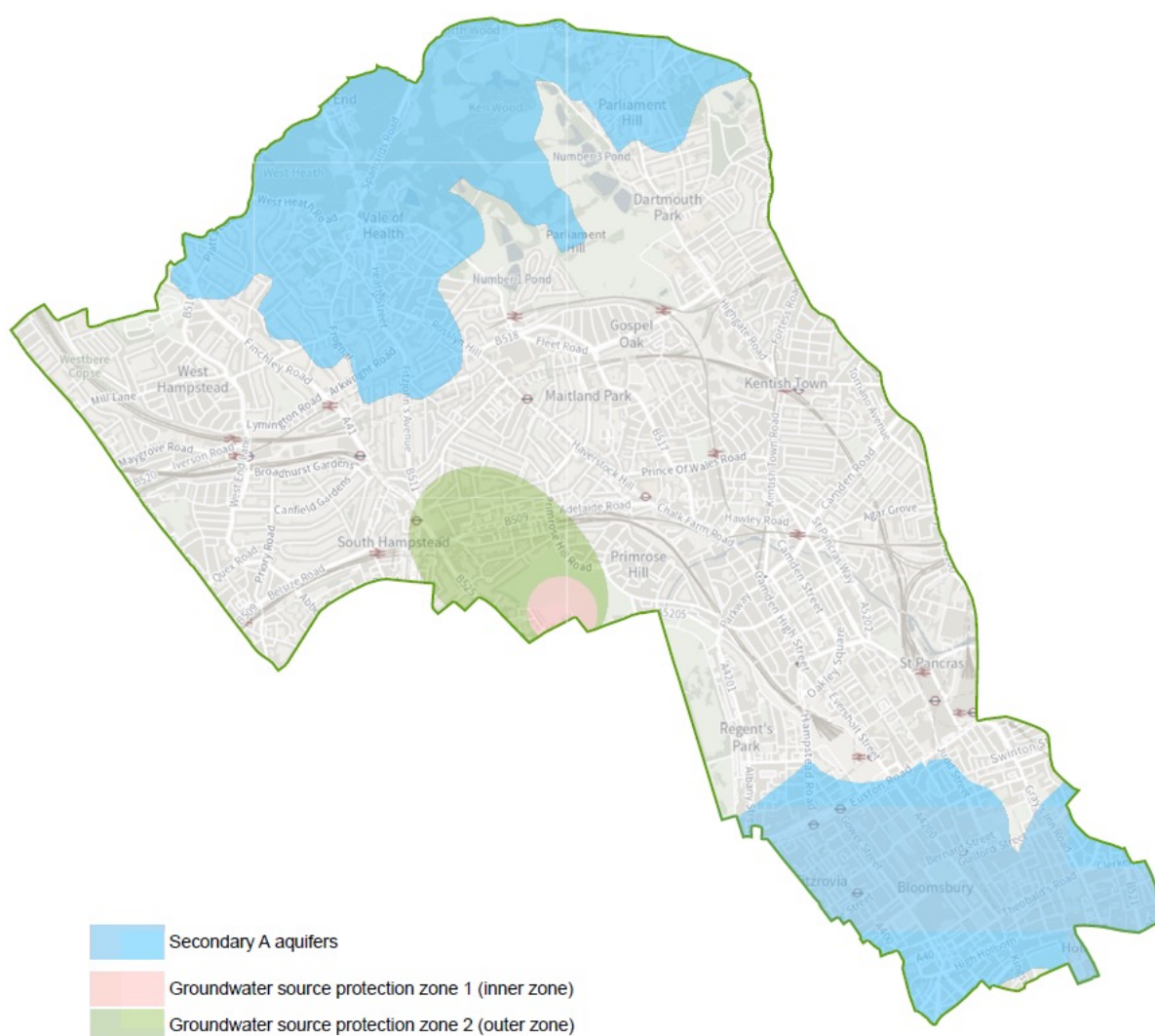
**11.52** Where developments are creating new public open spaces, funding for ongoing maintenance should be considered and provided in any new tree planting scheme. The Council will seek a financial contribution to cover maintenance costs.

## Water Quality

**11.53** It is important that we take steps to safeguard water quality in Camden to protect drinking water and prevent harm to the natural environment. Development activities may impact surface water and groundwater quality. The way water is used in a building and the pollutants it picks up running across a site also affect the quality of the water that reaches groundwater sources.

**11.54** Camden has two Groundwater Source Protection Zones. These are water abstraction sites, their purpose is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon a drinking water abstraction. Camden's Source Protection Zones are located within the southwest of Primrose Hill Park and a section of South Hampstead from Prince Albert Road to Swiss Cottage. As shown on Map 12 below.

**Map 12 – Ground Water Source Protection Zones and Secondary A Aquifers**



**11.55** Areas to the north and south of Camden (around Hampstead Heath, Hampstead, Bloomsbury, Holborn) are also designated as Secondary A aquifers which are capable of supporting local water supply. As such, groundwater is sensitive in these areas and the quality and quantity of groundwater needs to be protected. These areas are defined on Map 12.

- 11.56** This policy seeks to protect water quality in Camden and ensure that the areas defined above and on Map 12 are taken into account when considering the environmental impact of a development.

## Policy NE4 - Water Quality

- A.** The Council will seek to ensure that development avoids the pollution of groundwater sources to protect the water environment and public health. The Council will:
- i.** Require a Preliminary Risk Assessment to be submitted where land is potentially contaminated. Where development poses a risk to groundwater within the borough's Source Protection Zones, to submit a Hydrogeological Risk Assessment. If the Hydrogeological Risk Assessment identifies unacceptable risk, then the applicant will be required to provide appropriate mitigation. Any mitigation proposed must be agreed by the Council and Environment Agency in writing prior to implementation.
  - ii.** Require applicants to undertake a Foundation Works Risk Assessment (FWRA) where piled foundation works are proposed within a Source Protection Zone, or where piled foundations extend through the London Clay to more sensitive aquifers, to ensure that the risks to groundwater are minimised.
  - iii.** Require development within the borough's Secondary A aquifers to protect groundwater from pollution.
  - iv.** Expect developers to prevent discharges to ground through land affected by contamination.

- 11.57** Secondary A aquifers, support water supplies at a local rather than strategic scale. As such, groundwater is sensitive in these areas and the quality and quantity of groundwater should be protected and enhanced through any future development works. The Environment Agency's Approach to Groundwater Protection should be consulted for development constraints at sites atop Secondary A aquifers, as well as development types that we would object to in principle (i.e. petrol filling stations and non-inert landfills within Source Protection Zone 1 (SPZ1).

- 11.58** Activities in the borough which could result in the disturbance of aquifer and groundwater resources include: ground source heat pumps; new roads schemes; developments that involve piling; foundation development; and basement excavations. These activities can artificially lower or raise groundwater levels, alter groundwater flow paths, or even cut off groundwater flow completely. This can all result in resource and quality problems.

- 11.59** A Preliminary Risk Assessment is a desk top study used to identify contamination risks posed at a development site. Developments that pose risk to groundwater must submit a Hydrogeological Risk Assessment (HRA) to the Environment Agency and the Council as planning authority. Any activities that can adversely affect groundwater must be considered, including physical disturbance of the aquifer. If the HRA identifies unacceptable risk, then the applicant must provide appropriate mitigation. Any mitigation measures must be agreed by the Council and Environment Agency in writing prior to their implementation.

- 11.60** Where piled foundation works are proposed in a Source Protection Zone, or where piled foundations extend through the London Clay to more sensitive aquifers, then

a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised. Current available guidance includes, [Piling in layered ground: risks to groundwater and archaeology](#), and [Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention \(National Groundwater and Contaminated Land Centre report NC/99/73\)](#).

- 11.61** Where land is potentially contaminated as a result of current or former uses applicants will be required to carry out a Preliminary Risk Assessment to identify any potential impact on water quality. The Preliminary Risk Assessment should identify all potential sources of contamination (past and present) and determine the contamination risk at a site and the potential impact to site users. This process should include analysis of historical and geological map data to identify previous uses of the site and environmental data on ground conditions, hydrology and relevant local features. The Council will expect developers to prevent discharges to ground through land affected by contamination.
- 11.62** Further details on the Council's requirements in relation to assessing and remediating contaminated land are set out in Policy A1 Protecting amenity and in the Camden Planning Guidance on Amenity.

# Design and Heritage





# Chapter 12: Design and Heritage

- 12.1** Camden is diverse and dynamic with many distinctive neighbourhoods, each of which has its own unique character and identity and contributes towards making the borough such an attractive place to live, work and visit.
- 12.2** The borough also has a rich architectural heritage, with over 5,600 nationally listed buildings and structures and 40 conservation areas, which contribute towards local distinctiveness both within Camden and London as a whole.
- 12.3** Good design is essential to creating places, buildings, and spaces that work well for everyone, look good, last well, and will adapt to the needs of current and future generations. Design also has a fundamental role in both tackling and responding to climate change, and creating healthy and sustainable spaces and places that help reduce inequality and promote health and well-being for all.
- 12.4** National planning policy is clear that planning should always seek to secure high quality, beautiful and sustainable buildings and places and that good design is indivisible from good planning.
- 12.5** Policy D1 seeks to maintain and enhance the borough's character and distinctiveness, whilst ensuring that new development coming forward in the borough is designed and built to exemplary standards, to maintain and secure a high-quality environment for everyone to enjoy both now and in the future.

## Policy D1 – Achieving Design Excellence

- A.** All development in Camden must achieve excellence in the architecture and design of buildings and places to respond to the climate change emergency, improve the health and well-being of our communities and celebrate Camden's diversity of people and place.
- B.** The Council will require that development:

### Character and Context

- i.** responds positively and sensitively to local context and character through layout, orientation, scale, height, bulk massing, proportion, appearance and the use of high quality, durable and sustainable materials;
- ii.** seeks to create character where none exists;
- iii.** preserves or enhances the historic environment and heritage assets in accordance with Policy D5 Heritage;
- iv.** responds to local views and preserves protected views;

### Built Form

- v.** is sustainable in design and construction, incorporating best practice in resource efficiency, energy reduction and climate resilience measures, in accordance with Policies CC1 – CC12 in the Climate Change chapter;

- vi. is functional, and designed to take into account the proposed use and needs of the expected occupants of the building, and other users of the space;
- vii. is designed to be flexible and adaptable to meet the needs of future users and occupiers;
- viii. meets the highest practicable standards of accessible and inclusive design so it can be used safely, easily and with dignity by all;
- ix. promotes health and well-being in accordance with Policy SC1;
- x. is safe and secure, and designed to minimise crime and antisocial behaviour in accordance with Policy A2 Safety and Security;
- xi. contributes positively to achieving an active street frontage and supports opportunities for natural surveillance in accordance with Policy A2 Safety and Security;
- xii. carefully integrates building services equipment, minimising visual clutter and ensuring there is no harm to the wider townscape and the amenity of neighbouring occupiers;
- xiii. incorporates adequate servicing for each land use within the footprint of the building/s and site, where required;
- xiv. provides appropriate facilities for the storage, separation and collection of all types of waste and recycling;
- xv. responds to natural features and incorporates outdoor amenity space;
- xvi. provides visual interest from all aspects and incorporates public art where appropriate;

## **Movement**

- xvii. connects well with existing places, spaces and routes, and allows effective movement between the site and the surrounding area;
- xviii. is easy to navigate and move through, with recognisable routes and signage;
- xix. creates high quality, healthy streets that support and encourage walking, wheeling and cycling in accordance with Policy T2 Prioritising walking, wheeling, and cycling;

## **Public Spaces**

- C. Where public spaces are provided as part of developments the Council will require that these spaces:
  - i. celebrate and reflect the diversity of the communities they are within through high quality interpretation, events, public art and decorative features co-designed with local people;
  - ii. are well located; of a high quality; and are designed to be safe, secure, welcoming, uncluttered and accessible for all;
  - iii. incorporate outdoor seating, sheltered rest places, quiet spaces, street furniture, boundary treatments, lighting and signage, that is well designed and sensitively located, to make a positive contribution to the character and distinctiveness of the area;
  - iv. provide free, publicly accessible toilets suitable for a range of users, where appropriate;
  - v. provide opportunities for formal and informal play; and
  - vi. incorporate high quality landscape design and maximise opportunities for greening for example through the planting of trees, provision of open space, soft landscaping, and areas for food growing, to enhance biodiversity, promote health and well-being, manage flood risk and provide opportunities for shade.

- D. Applicants must evidence how they have responded positively to the design policies in the Local Plan, and associated guidance, as part of the Design and Access Statement submitted with their planning application.
- E. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

## Design Quality in Camden

- 12.6** In designing developments, applicants are required to have regard to the design guidance prepared by the Council, the GLA, and the Government, in addition to policies within adopted Neighbourhood Plans. This currently includes:
- Neighbourhood Plan policies on design
  - Camden Planning Guidance covering design; access for all; amenity; artworks, statues and memorials; basements; energy efficiency and adaptation; home improvements; planning for health and wellbeing; and public open space
  - Guidance set out in the Camden Characterisation Study
  - Guidance provided in Planning Frameworks
  - Guidance set out Conservation Area Appraisals
  - London Plan policies;
  - Supplementary Planning Guidance issued by the Mayor of London
  - North London Waste Plan policies
  - Guidance set out in the National Design Guide and National Model Design Code
- 12.7** Camden has also developed its first ever Diversity in the Public Realm strategy, that seeks to create a Camden that is truly representative of the people we have within our borough, through the lens of the public realm, and it is important that new development coming forward in the borough has regard to this strategy and seeks to deliver its aims and objectives.
- 12.8** To secure design excellence in Camden the Council will consider using several mechanisms, including:
- requiring a sufficient level of design information, including key construction details, to be provided as part of planning applications, to ensure the quality of design can be maintained if a permitted scheme is subject to subsequent minor amendments;
  - requesting that detailed design sections and supporting information is provided, where appropriate, to illustrate a proposal;
  - the use of townscape experts on applications for major development;
  - ensuring the wording of any planning permission granted, and associated conditions and/or legal agreement, provide clarity regarding the quality of design expected; and
  - the use of architect retention clauses in legal agreements where appropriate.

## Community Engagement

- 12.9** Development in Camden must meet the needs of Camden's residents. It is therefore important that local people, including young people, are involved in the design of new buildings, spaces and places in Camden, to give them a genuine opportunity to shape the development of their neighbourhoods. This also provides applicants with a vital resource to help them understand the neighbourhood they are building in and create somewhere special and valued.

- 12.10** The Council will expect applicants to engage with local communities on the design of schemes as part of the planning application process. Engagement should be undertaken from the outset of a project and prior to the submission of proposals to the Council for consideration. The Council will expect applicants to evidence what engagement they have undertaken with local communities, the key issues raised and how this has been used to inform the design of their scheme. This should be set out in the Design and Access Statement that accompanies the planning application for the scheme.
- 12.11** Applicants should also seek to ensure that their design teams are as diverse as the communities they are building in, to ensure that schemes are designed to meet the needs of all.

### **Design and Access Statements**

- 12.12** Developers should explain and justify their response to the components of good design set out in Policy D1 and the other design policies in this Plan through their Design and Access Statement.
- 12.13** Design and Access Statements are required to accompany all planning, conservation and listed building applications, except in certain circumstances as set out on our website: [www.camden.gov.uk/planning](http://www.camden.gov.uk/planning).

### **Independent Design Review**

- 12.14** Securing high quality development requires rigorous, early and effective dialogue between all those involved in the development process. Design review provides additional expert advice to inform the planning process.
- 12.15** Developers and landowners will be encouraged to use design review as a useful mechanism for supporting the process of securing high quality design. Review will be expected for significant development proposals. Proposals may be considered significant in terms of their scale, location or nature.

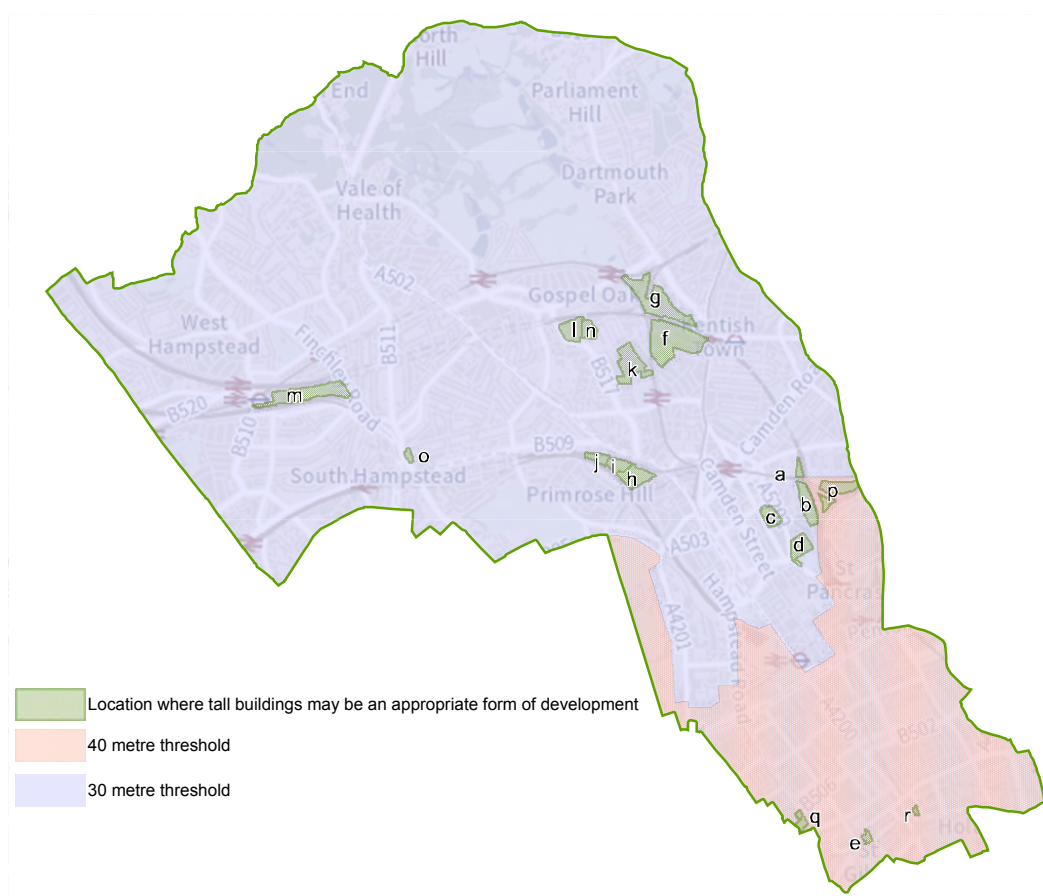
## **Tall Buildings**

- 12.16** Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. While tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered in order not to detract from the nature of surrounding places and the quality of life of those living and working around them.
- 12.17** In line with the approach set out in the London Plan (2021), Policy D2 defines what a 'tall building' is for specific localities and identifies locations where tall buildings may be an appropriate form of development in Camden, subject to meeting the other requirements of the Plan. It also sets out criteria to guide the determination of applications for tall buildings in the borough.

## Policy D2 - Tall Buildings

- A.** The Council defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured from the lowest point on the ground to the uppermost part of any rooftop structures (including plant and lift overruns), as shown on Map 13.
- B.** Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Map 13 below and listed in Appendix 2. Guidance on building heights for specific sites is set out in the relevant site allocation policies.
- C.** The Council will assess proposals for buildings above the threshold heights set out in (A) above against the London Plan tall buildings policy and the design criteria in Policy D1 (Achieving Design Excellence). We will also give particular attention to:
- i.** how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline, having regard to both the existing and the emerging context;
  - ii.** whether the proposal maximises energy efficiency and resource efficiency in accordance with Policies CC3, CC4, CC5 and CC6 in the Climate Change Chapter;
  - iii.** whether the development delivers the highest standards of sustainable design and construction in line with Policy D1 Achieving Design Excellence and Policy CC10 Sustainable Design and Construction Certification;
  - iv.** whether the proposal maximises the supply of affordable housing and delivers 50% affordable homes in accordance with the target set out in Policy H4 Affordable Housing;
  - v.** whether the proposal creates a safe and secure environment in accordance with Policy A2 Safety and Security;
  - vi.** whether the site is of a sufficient size to accommodate a tall building, without having a detrimental impact on existing buildings, the public realm and amenity;
  - vii.** the historic context of the building's surroundings;
  - viii.** the relationship between the building and hills and views, ensuring that any proposal responds to local views and preserves protected views;
  - ix.** the contribution a building makes to pedestrian movement, connectivity and improved public accessibility;
  - x.** the degree to which the building overshadows neighbouring buildings and spaces, especially public spaces, open spaces and watercourses;
  - xi.** the relationship between the building and other neighbouring tall buildings;
  - xii.** the contribution the development makes to wider place making objectives and infrastructure delivery in line with Policies DS1 Healthy and Sustainable Development, D1 Achieving Design Excellence and DM1 Delivery and Monitoring;
  - xiii.** the quality of homes and amenities provided; and
  - xiv.** the proposed internal and external illumination of the building. All tall building proposals will require a Lighting Strategy.

## Map 13 – Tall building definition for specific localities in Camden and locations where tall buildings may be an appropriate form of development.



**12.18** Map 13 shows where the tall building thresholds set out in Policy D2 (A) will apply in Camden and identifies locations in the borough where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan. These have been informed by the Camden Building Heights Study. Guidance on building heights for specific sites is set out in the relevant site allocation policies. A list of the sites shown on Map 13 are set out in Appendix 2.

**12.19** The Euston Area Plan sets out the policy approach to tall buildings in the designated Euston area and identifies locations where tall buildings may be an appropriate form of development. Applications for tall buildings within the boundary of the Euston Area Plan should therefore also have regard to the Euston Area Plan.

**12.20** Policy D2 sets out the criteria against which the Council will assess proposals for tall buildings. Applications for tall buildings will also be considered against Local Plan policies on design, heritage, amenity, health and wellbeing, safety and security, climate change, affordable housing and other relevant Plan policies, and against the London Plan policy on tall buildings.

**12.21** Tall buildings in Camden will be expected to be of the highest design quality in terms of their appearance, but also internally and in their environmental

performance, sustainability, urban design, and safety against fire. Tall buildings should also be designed to promote health and well-being, address potential suicide risks and create a safe and secure environment.

- 12.22** Key considerations relate to the integration of a building into its immediate context, its relationship with neighbouring tall buildings and impact on the public realm. When integrating tall buildings, particularly those with a tower component, into existing or proposed new streets, the base of a building formed by a podium should relate to the prevailing height of other buildings forming the street frontage.
- 12.23** In addition to making a positive contribution to the public realm through the design of the base of the building, particular care should be taken to ensure that the design of upper parts of tall buildings minimise any impacts on local microclimates in terms of potential increases in wind speeds, wind turbulence and overshadowing. Furthermore, careful consideration must be given to the impact of a proposal on the sky view and skyline from the public realm.
- 12.24** The Council will seek to maximise active frontages and the visual richness of the design of the base of any proposed tall building and how it integrates with the streetscape. Proposals should seek to provide legible entrances and minimise the impact of any dead or blank frontages. Careful consideration should be given to the location of loading bays, vehicular entrances and servicing requirements on the public realm.
- 12.25** Further relevant guidance to the Council's approach to tall buildings is set out in:
- Area Action Plans including the Euston Area Plan and the Fitzrovia Area Action Plan;
  - Conservation area appraisals and management strategies;
  - The Camden Character Study; and
  - Neighbourhood Plans.
- 12.26** The Council will take these documents into account, where relevant, in assessing applications for tall buildings.

## Design of Housing

- 12.27** The design of housing in Camden has a huge influence on the health and wellbeing of its occupiers. It is therefore important that housing is designed to meet the needs of all Camden's residents.
- 12.28** Housing should be designed to be flexible and adaptable, taking account of changes in the age profile of Camden residents, and particularly the growth in the number of older people, in addition to the needs of future generations.
- 12.29** The Council will therefore seek to secure a variety of high quality housing to meet the needs of different users in accordance with the housing policies in the Plan and will not sacrifice quality in order to maximise overall housing delivery.

## Policy D3 - Design of Housing

- A.** All housing development, including proposals for the alteration, extension, and conversion/ change of use of existing buildings must be designed and built to create high quality, accessible homes. The Council will:
- i.** Ensure that housing development meets the residential design standards set out in the London Plan and the Supplementary Planning Guidance issued by the Mayor;
  - ii.** Require housing development to be sustainable in design and construction, incorporating best practice in resource efficiency, energy reduction and climate resilience measures, in accordance with policies D1 and climate change policies CC1 - CC12;
  - iii.** Support the extension and alteration of existing homes provided the proposal is in accordance with Policy D4 below;
  - iv.** Encourage the design of all housing to provide functional, adaptable and accessible spaces;
  - v.** Require housing development to provide appropriate facilities for the storage, separation and collection of all types of waste and recycling;
  - vi.** Expect all self-contained homes to meet the nationally described space standard;
  - vii.** Require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2);
  - viii.** Require 10% of new-build self-contained homes in each development to be wheelchair user dwellings in accordance with Building Regulation M4(3);
  - ix.** Require housing development to provide private outside space, for example balconies, roof terraces and/or communal gardens;
  - x.** Require housing developments, where appropriate, to incorporate good-quality, accessible play provision for all ages in line with the London Plan policy on play and recreation; and
  - xi.** Seek the delivery of biodiversity enhancements in line with Policy NE2.

### Housing Design

- 12.30** The Council will expect housing in Camden to be designed with regard to:
- The relevant policies in the Plan, particularly those on housing, design, extensions and alterations, heritage, climate change and biodiversity;
  - Camden Planning Guidance, particularly Camden Planning Guidance on design, housing, sustainability, amenity and transport;
  - London Plan policies, particularly those on design, housing and play and London Plan guidance;
  - Supplementary Planning Guidance issued by the Mayor of London;
  - The North London Waste Plan;
  - Building for a Healthy Life - the industry and government endorsed standard for well-designed homes and neighbourhoods; and
  - WELL Building Standard – the global rating system focussed on the ways that buildings, and everything in them, can improve comfort, drive better choices, and enhance health and wellness.
- 12.31** Developers should explain and justify their response to the components of good design set out in this policy, elsewhere in this Plan and in other documents, in the Design and Access Statement to be submitted with their planning application.



## Space Standards

- 12.32** A high-quality home should be designed to ensure sufficient space is available for furniture, activity and movement. The government has produced a 'nationally described space standard' which local plans can adopt to ensure that homes are designed with sufficient internal space. The standard sets out the minimum acceptable gross internal area in square metres depending on the number of bedrooms, the number of intended occupiers, and the number of storeys.
- 12.33** The nationally described space standard forms part of Policy D3 and has also been formally incorporated into the London Plan 2021 (Table 3.1 on page 127). The nationally described space standard will be applied to all new dwellings, whether they are created through newbuilding, conversions, or changes of use in line with the Mayor's Housing SPG. Where dwellings will be created from conversions or changes of use, the Council will apply the nationally described space standard flexibly taking into account the constraints arising from conversion of existing buildings, particularly listed buildings and other heritage assets.
- 12.34** Applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against Policy D3 requirements relating to space standards, in accordance with the Mayor's Housing SPG.
- 12.35** Specific arrangements apply to considering the standard of internal spaces in developments of specialist housing and housing with shared facilities. These are set out in the supporting text below.

## Accessible and adaptable dwellings and wheelchair user dwellings

- 12.36** Many households in Camden require accessible housing to lead dignified and independent lives. Accessible and adaptable dwellings are homes specifically designed to support the changing needs arising through a family's lifecycle, incorporating features to help accommodate pregnancy, prams and pushchairs, injury, disability, and old age. These features also allow a dwelling to be easily adapted for even higher levels of accessibility in the future, if the need arises, allowing people to live in their own home for as much of their life as possible. Wheelchair user dwellings are designed to more demanding criteria relating to ease of movement and activity and are intended to be easy to adapt for households that include someone who needs to use a wheelchair within the home.
- 12.37** The government has produced optional Building Regulation requirements which can be used to increase the accessibility of new build homes to all, including people with physical disabilities. Where accessibility requirements are warranted by local circumstances and are financially viable, the optional Building Regulation requirements can be incorporated in local plan policy and applied to specific homes in a development through planning conditions. Policy D3 and the London Plan (policy D7 Accessible housing) seek to ensure that new build homes meet the optional requirements where feasible.
- 12.38** Part M4 of the optional Building Regulations includes two categories – M4 (2) "accessible and adaptable dwellings" and M4 (3) "wheelchair user dwellings". Part M4(3) further distinguishes between "wheelchair accessible" dwellings (homes

ready for occupation by a person using a wheelchair at the point of completion) and “wheelchair adaptable” dwellings (homes that can be easily adapted to meet the needs of a person using a wheelchair).

- 12.39** Policy D3 includes a requirement for 90% of new build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair user dwellings). These requirements are consistent with the London Plan and apply across London. Information about where we will require “wheelchair accessible” dwellings and where we will require “wheelchair adaptable” dwellings is provided below.
- 12.40** Compliance with Optional Building Regulation requirements can only be sought where Part M of the Building Regulations applies, and the requirements can only be activated by a planning condition specifying the homes affected. Part M applies to new-build dwellings, but does not apply to dwellings created by changes of use or conversions of an existing building. Planning conditions can also only be used where all elements of the relevant Regulation can be achieved. They cannot be applied to a dwelling where step-free access cannot be achieved. Circumstances where a planning condition may be inappropriate include flats above or below the entry level in a building where incorporation of a lift would not be viable.
- 12.41** In applying the requirement for 90% M4(2) accessible and adaptable dwellings and 10% M4(3) wheelchair user dwellings, the Council will round the number of homes required in each category to the nearest whole number such that the total requirement for M4(2) and M4(3) dwellings adds up to 100%. The Council will not require M4(3) wheelchair user dwellings as part of developments that provide five additional dwellings or fewer.
- 12.42** The Council will generally apply the requirement for 10% wheelchair user dwellings across each housing type or tenure in a scheme, seeking 10% of market housing, 10% of low-cost rented housing (Social Rent or London Affordable Rent) and 10% of intermediate housing. We may seek to increase the percentage of wheelchair user dwellings in the the low-cost rented sector and reduce the percentage in the market or intermediate sectors, or both, where this will enable us to meet an identified need for low-cost rented housing appropriate to people who use wheelchairs.
- 12.43** In the market and intermediate sectors, we will use planning conditions to secure wheelchair user dwellings that comply with Part M4(3)(2)(a) requirements for “wheelchair adaptable” dwellings. Households that include a person who uses a wheelchair are much more likely to occupy social rented housing than other tenures, and the waiting list for wheelchair user dwellings far exceeds supply. In the case of low-cost rented housing, future occupiers can be nominated from the Housing Register (waiting list), and from transfer lists. The Council will therefore require 10% of low-cost rented homes in each development to be “wheelchair accessible” and be fully fitted-out for occupation by a household containing a person who uses a wheelchair. We will use planning conditions to specify those low-cost rented homes that must comply with Part M4(3)(2)(b) requirements for “wheelchair accessible” dwellings.
- 12.44** Applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against Policy D3, in accordance with the Mayor’s Housing SPG.

- 12.45** Specific arrangements apply to considering accessibility in developments of specialist housing and housing with shared facilities. These are set out in the Paragraphs below.

### **Space and accessibility for specialist housing and shared housing**

- 12.46** The Mayor's Housing SPG advises that the nationally described space standard and the optional Building Regulations do not apply to specialist forms of housing such as student housing and care homes. However, the space needed for furniture, activity and movement should be considered when designing all forms of housing, and the Council will expect all proposals to provide adequately sized rooms and convenient and efficient room layouts that are functional and fit for purpose.
- 12.47** Houses and flats shared by 3-6 people who do not live as a family (small houses in multiple occupation, Use Class C4) can change to Use Class C3 without a planning application under the freedom provided in legislation. Proposals for homes in Use Class C4 should be designed to comply with Policy D3 in respect of space standards and optional Building Regulations if they are to benefit from the freedom to change to Use Class C3. Where homes in Use Class C4 do not comply with these aspects of Policy D3 we will consider using planning conditions to remove the freedom to change to self-contained homes. The Council has also agreed minimum standards for housing with shared facilities under the Housing Act 2004, please see Policy H10 Housing with shared facilities ('houses in multiple occupation') for more information.

### **Private amenity space and play provision**

- 12.48** The Council will require developments to include private outdoor amenity space to enhance residents' quality of life and improve health and well-being. Gardens, balconies and roof terraces are greatly valued and can be especially important for families. However, the densely built-up nature of the borough means that the provision of private amenity space can be challenging, and the Council will require that the residential amenity of neighbours is preserved.
- 12.49** In addition to this, where a development generates a need, the Council will seek to secure the suitable provision of play space for children and young people on-site. Play space provision will be expected to comply with the London Plan standards and designed to be welcoming, safe, accessible and inclusive for a range of ages and needs, in particular disabled and neurodiverse users.

## **Extensions and Alterations**

- 12.50** Housing in Camden is some of the most expensive to rent and buy in the UK and the shortage of affordable housing is leading to people moving out of Camden – and many people who have grown up in the borough cannot afford to stay, especially when they start a family. These issues also mean that some people and families are living in overcrowded and poor quality housing, which has a detrimental impact on mental and physical health, wellbeing, education and more.
- 12.51** Extensions and alterations offer the opportunity for residents to improve and expand their homes to respond to changes in circumstance, improve living

conditions, make their homes more energy efficient and climate resilient, and ensure their homes meet their needs both now and in the future.

**12.52** It is however important that extensions and alterations are undertaken in a sympathetic way, to achieve a high quality, sustainable development that responds to and respects the existing building and surrounding townscape (particularly in relation to heritage assets) and does not harm the amenity of neighbours.

**12.53** In some circumstances extensions and alterations can be undertaken without needing to apply for planning permission, as they are considered to be 'permitted development' under national planning rules. Permitted development rights do not however generally apply:

- to flats or properties converted into flats;
- to listed buildings;
- where they have been removed (through use of an 'Article 4 Direction'), most likely within Conservation Areas; and
- where they were removed as part of previous planning permissions.

**12.54** Whilst most applications for extensions and alterations relate to houses, the Council recognises that residents living in flats or properties converted into flats, may also want to extend or alter their homes. The Council is supportive of this, subject to the assessment of the impact, as part of the planning application process, in line with Policy D4 below.

## Policy D4 – Extensions and Alterations

- A.** The Council will support applications for extensions and alterations to houses and flats where:
- i. The proposed extension is subordinate to the building being extended or altered, in relation to its location, form, footprint, scale, proportions, dimensions and detailing;
  - ii. The proposed extension is designed and constructed to respect and complement the main building and wider townscape, using materials and detailing that are appropriate to the host building in accordance with Policy D1 (Design Excellence); and
  - iii. The proposed extension is to be designed to respect the residential amenity of adjacent properties in accordance with Policy A1 (Amenity).
- B.** Roof extensions will be supported in principle where they do not adversely impact on designated heritage assets in accordance with Policy D5 (Heritage). Where a roof extension is proposed, this should be consistent with the prevailing height and form of neighbouring properties and the overall street scene; and designed to maintain safe access and egress for occupiers.
- C.** Mansard roof extensions should be designed to harmonise with the original building.
- D.** Proposals for extensions and alterations to houses and flats will be required to deliver energy efficiency improvements in accordance with Policy CC3 (Reducing energy in existing buildings).

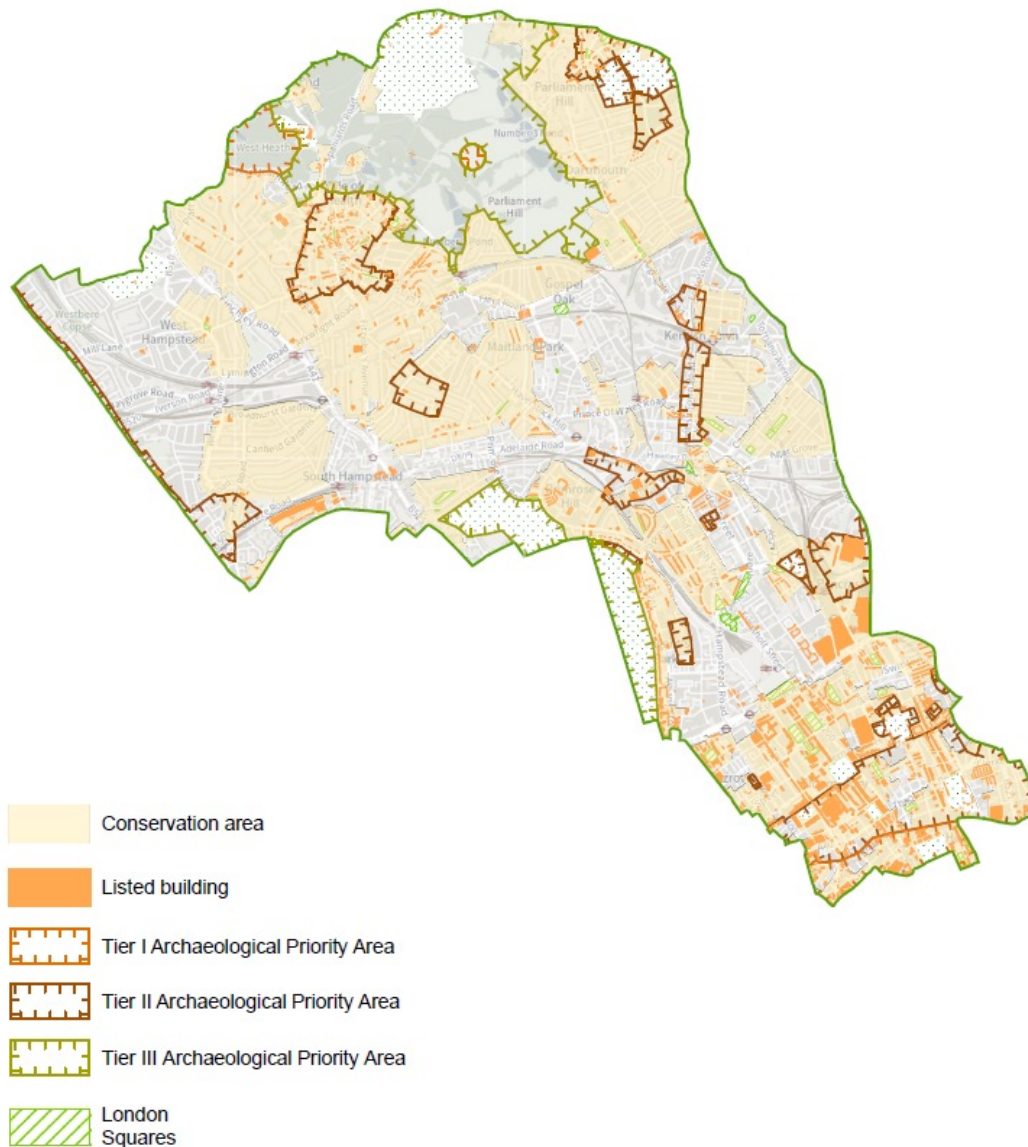
**E.** Proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with Policy NE2 (Biodiversity).

- 12.55** Works to alter and extend existing houses and flats will be supported where they are successfully integrate with their surroundings. To achieve this, extensions should be subordinate to the host building, respecting the scale, detailing and materials of both existing buildings and adjoining townscape. Care should always be taken not to disfigure buildings or upset their proportions and to ensure good standards of amenity as set out in Policy A1 (Protecting Amenity).
- 12.56** Roof extensions can be a practical way to create additional floorspace but can also have an impact on the character and appearance of buildings and the wider townscape, and a sensitive approach and highest standards of design will be required in line with Policy D1 Achieving Design Excellence. Roof extensions to listed buildings, or within conservation areas, will be supported provided they do not adversely impact on the designated heritage asset, in accordance with Policy D5 (Heritage) and are line with the policies set out in the Plan. Where a proposed roof extension will lead to less than substantial harm to the significance of a designated heritage asset, the Council will weigh that harm against the public benefits of the proposal, giving significant weight to the need to address overcrowding and create a more family friendly borough and the extent to which the proposal delivers measures that respond to the climate and ecological emergency in a sensitive manner.
- 12.57** Many of Camden’s residential areas are characterised by terraced housing of consistent design. On terraced houses of the Georgian and Victorian eras, mansards will very often be the most appropriate form of roof extension. However, this will depend on the age and style of the building. Where there was a tradition of mansard construction locally at the time of the building’s construction, the extension should emulate it with respect to external appearance.
- 12.58** Where extensions and alterations to existing houses and flats are proposed the Council will expect applicants to demonstrate how they have considered and will implement energy efficient improvements through retrofitting, to make the building more energy efficient and reduce the energy needed to occupy the building. Further guidance on this is set out in Policy CC3 Energy Reduction in Existing Buildings.
- 12.59** Where extensions and alterations to houses and flats are proposed the Council will expect biodiversity enhancements to be delivered commensurate with the scale of the development proposed, to mitigate any potential loss in biodiversity, in line with Policy NE2 (Biodiversity). Here a number of potential measures could be incorporated into schemes including green roofs, swift bricks, bird and bat boxes and sustainable urban drainage systems.

## Heritage

- 12.60** Camden has a rich architectural heritage with many special places and buildings from throughout Camden’s history (see Map 14: Heritage and Archaeological Sites).

## Map 14: Heritage and Archaeological Sites



**12.61** The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to the conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings, where appropriate.

## Policy D5 – Heritage

- A. The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

### Designated Heritage Assets

- B. Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of, or substantial harm to, a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm, or loss, is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- i. the nature of the heritage asset prevents all reasonable viable uses of the site;
  - ii. no optimum viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
  - iii. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
  - iv. the harm or loss is outweighed by the benefit of bringing the site back into use.
- C. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- D. The Council will resist any cumulative, incremental, changes to a designated heritage asset, where there is concern that the changes may impact on the significance of the designated heritage asset or may cause harm to the character or appearance of the conservation area.

### Sustainability Improvements to Designated Heritage Assets

- E. The Council will support proposals to adapt and improve listed buildings, and buildings within conservation areas, to reduce energy demand, mitigate the impacts of climate change and ensure they are adaptable to a changing climate provided they do not cause significant harm to the special historic or architectural interest of the heritage asset. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will weigh that harm against the public benefits of the proposal, giving significant weight to measures that respond to the climate emergency in a sensitive manner.

### Conservation Areas

- F. Conservation areas are designated heritage assets, and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.
- G. The Council will:
- i. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

- ii. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- iii. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- iv. preserve trees and garden spaces which contribute to the character and appearance of a conservation area, or which provide a setting for Camden's architectural heritage.

### Listed Buildings

- H. Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets. To preserve or enhance the borough's listed buildings, the Council will:
- i. resist the total or substantial demolition of a listed building;
  - ii. resist proposals for a change of use or alterations and extensions, including cumulative or incremental changes to a listed building where this would cause harm to the special architectural and historic interest of the building;
  - iii. resist development that would cause harm to the significance of a listed building through an effect on its setting; and
  - iv. require any works to a listed building to be carried out in an appropriate manner informed by relevant specialists.

### Archaeology

- I. The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

### Other Heritage Assets and Non-designated Heritage Assets

- J. The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.
- K. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

### Designated heritage assets

- 12.62 Designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas. The Council will apply the policy above and will not permit harm to a designated heritage asset unless the public benefits of the proposal outweigh the harm. Further guidance on public benefits is set out in National Planning Practice Guidance. Any harm to or loss of a designated heritage asset will require clear and convincing justification, which must be provided by the applicant to the Council. In decision making the Council will take into consideration the scale of the harm and the significance of the asset.



**12.63** In accordance with the National Planning Policy Framework the Council will only permit development resulting in substantial harm to or loss of a grade II listed building, park or garden in exceptional circumstances and will only permit development resulting in substantial harm to or loss of a grade I and II\* listed building, grade I and II\* registered park or garden in wholly exceptional circumstances.

### **Sustainability improvements to designated heritage assets**

**12.64** Historic buildings, including those in conservation areas, can be sensitively adapted to reduce energy demand and respond to the climate emergency, while preserving their special interest and ensuring their long-term survival.

**12.65** Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and heating and lighting systems and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics.

**12.66** In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas and the Historic England website.

### **Conservation areas**

**12.67** The Council has prepared a series of conservation area statements, appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas, in addition to setting out how we consider they can be preserved or enhanced. These are material considerations in the determination of planning applications for development in conservation areas.

**12.68** When assessing planning applications for development within conservation areas we will consider the importance of preserving and enhancing conservation areas alongside achieving other priorities and delivering wider public benefits. Recognising that many of the Council's Conservation Area Appraisals don't reflect current concerns such as responding to the climate emergency and supporting families to alter and extend their homes to meet their needs.

**12.69** The character of conservation areas is derived from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing and uses. These elements should be identified and responded to in the design of new development. Design and Access Statements should include an assessment of local context and character and set out how the development has been informed by it and responds to it.

**12.70** Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development, which is outside of conservation areas, but visible from within them. This includes tall or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.

### **Demolition in conservation areas**

**12.71** All proposals for the demolition of buildings should have regard to Policy CC2 (the re-purposing, refurbishment and re-use of existing buildings). In addition, the Council has a general presumption in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area, whether they are listed or not, so as to preserve this character and appearance. The Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless circumstances are shown that outweigh the case for retention. Applicants will be required to justify the demolition of a building that makes a positive contribution to a conservation area, having regard to Policy CC2 of the Plan, the National Planning Policy Framework, Camden's conservation area statements, appraisals and management strategies and any other relevant supplementary guidance produced by the Council.

**12.72** When considering applications for demolition, the Council will take account of the group value, context and the setting of buildings, as well as their quality as individual structures and any contribution to the setting of listed buildings. Applications must clearly show which buildings or parts of buildings are to be demolished.

**12.73** Applications for total or substantial demolition in conservation areas must demonstrate to the Council's satisfaction that effective measures will be taken during demolition and building works to ensure structural stability of retained parts and adjoining structures. Before planning permission for demolition is granted, the Council must be satisfied that there are acceptable detailed plans for the redevelopment.

### **Use**

**12.74** Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment. One use that is of particular importance to the character of conservation areas are pubs, especially when they are in located in historic buildings. The Council will protect pubs in accordance with Policy SC6 Public houses.

### **Details**

**12.75** The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the original. Traditional features should be retained or reinstated

where they have been lost, using examples on neighbouring houses and streets to inform the restoration.

## **Landscape**

- 12.76** Existing gardens, trees and landscaping make a particular contribution to the character of conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.

## **Listed buildings**

- 12.77** Camden's listed buildings and structures provide a rich and unique historic and architectural legacy. They make an important and valued contribution to the appearance of the borough and provide places to live and work in, well known visitor attractions and cherished local landmarks. We have a duty to preserve and maintain these for present and future generations.
- 12.78** The Council has a general presumption in favour of the preservation of listed buildings. Total demolition, substantial demolition and rebuilding behind the façade of a listed building will not normally be considered acceptable. The matters which will be taken into consideration in an application for the total or substantial demolition of a listed building are those set out in the National Planning Policy Framework.
- 12.79** In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Consent is required for any alterations, including some repairs, which would affect the special interest of a listed building.
- 12.80** The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it can often extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement.

## **Access in listed buildings**

- 12.81** Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.

## Archaeology

- 12.82** Camden has a rich archaeological heritage which comprises of both above and below ground remains, in the form of individual finds, evidence of former settlements and standing structures. These remains are vulnerable to modern development and land use. There are currently 17 Archaeological Priority Areas (APAs) in the borough (see Map 15: Heritage and Archaeological Sites), of which 3 sites are Tier 1 APA's, 11 sites are Tier 2 APA's and 3 sites are Tier 3 APA's. The total area of all the Archaeological Priority Areas in the borough is 638.7ha.
- 12.83** Tier 1 is a defined area which is known, or strongly suspected, to contain a heritage asset of national importance (a Scheduled Monument or equivalent), or is otherwise of very high archaeological sensitivity; Tier 2 is a local area within which the Greater London Historic Environment Record (GLHER) holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest; and Tier 3 is a landscape-scale zone within which the GLHER holds evidence indicating the potential for heritage assets of archaeological interest. All other areas of the borough (i.e. those not in identified APA's Tiers 1 - 3) are regarded as being in Tier 4. Tier 4 is any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area. However, Tier 4 areas are not necessarily devoid of archaeological interest and may retain some potential unless they can be shown to have been heavily disturbed in modern times.
- 12.84** The archaeological priority areas provide a general guide to areas of archaeological remains, but do not indicate every find site in the borough. These are based on current knowledge and may be refined or altered as a result of future archaeological research or discoveries.
- 12.85** It is likely that archaeological remains will be found throughout the borough, both within and outside the archaeological priority areas. Many archaeological remains have yet to be discovered, so their extent and significance is not known. When researching the development potential of a site, developers should, in all cases, assess whether the site is known or is likely to contain archaeological remains. Where there is good reason to believe that there are remains of archaeological importance on a site, the Council will consider directing applicants to supply further details of proposed developments, including the results of archaeological desk-based assessment and field evaluation.
- 12.86** Scheduled monument consent must be obtained before any alterations are made to scheduled ancient monuments. Camden has only one scheduled ancient monument: Boadicea's Grave in Hampstead Heath.
- 12.87** If important archaeological remains are found, the Council will seek to resist development which adversely affects remains and to minimise the impact of development schemes by requiring either in situ preservation or a programme of excavation, recording, publication and archiving of remains. There will usually be a presumption in favour of in situ preservation of remains and, if important archaeological remains are found, measures should be adopted to allow the remains to be permanently preserved in situ. Where in situ preservation is not feasible, no development shall take place until satisfactory excavation and recording of the remains has been carried out on site and subsequent analysis,

publication and archiving undertaken by an archaeological organisation approved by the Council.

- 12.88** The Council will consult with, and be guided by, Historic England and the Greater London Archaeology Advisory Service (GLAAS) on the archaeological implications of development proposals. The Greater London Historic Environment Record, maintained by Historic England, contains further information on archaeological sites in Camden.

### **Other heritage assets**

- 12.89** In addition to conservation areas, listed buildings and archaeological remains, Camden contains 14 registered parks and gardens, as identified by Historic England. There are also 53 London squares in the borough protected by the London Squares Preservation Act 1931. The Council will encourage the management of registered parks and gardens and London squares to maintain, and where appropriate, enhance their value and protect their setting. The Council will consult with Historic England over proposals affecting these parks and gardens. We also encourage the restoration and management of registered parks and gardens and London squares to enhance their value.

### **Non designated heritage assets**

- 12.90** The borough also has many attractive, historic, locally significant buildings and features which contribute to the distinctiveness of local areas, but which are not formally designated. The National Planning Policy Framework identifies these features as non-designated heritage assets. Non-designated heritage assets may either be identified as part of the planning process or on Camden's Local List. Camden's Local List identifies historic buildings and features that are valued by the local community and that help give Camden its distinctive identity but are not already designated in another way (for example a listed building). When planning permission is required for any proposal that directly or indirectly affects the significance of a non-designated heritage asset (either on the Local List or not) then the Council will treat the significance of that asset as a material consideration when determining the application. The criteria for local listing is set out in our Camden Planning Guidance on Design. The Local List is available at [www.camden.gov.uk/locallist](http://www.camden.gov.uk/locallist).

## **Basements**

- 12.91** Basements are often included in major developments, especially in the Central London part of Camden and used for various purposes including commercial, retail and leisure uses, servicing and storage. They can also provide additional space in homes. However, the impacts of basement construction on residents living in close proximity to the development site can be considerable.
- 12.92** Basement development, and other development that involves excavation, changes the ground and water conditions of the area and can potentially lead to ground instability or flooding, and have significant construction impacts, due to the need to remove spoil and the general complexities of excavation. The Council recognises the need to protect the environment and adjoining neighbours properties and buildings from these impacts.

- 12.93** When this policy refers to basement development this includes basements, lightwells and other underground development.
- 12.94** A basement is a floor of a building which is partly or entirely below ground level. A ground or lower ground floor with a floor level partly below the ground level (for example on a steeply sloping site) will therefore generally be considered basement development.
- 12.95** The following policies in this Local Plan are also relevant to basement development and will be considered when assessing basement schemes: Policy SC3 Open Space; Policy NE2 Biodiversity; Policy D1 Design; Policy D5 Heritage and Policy CC11 Flood Risk.

## Policy D6 – Basements

- A.** The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
- i.** neighbouring properties;
  - ii.** the structural, ground, or water conditions of the area;
  - iii.** the character and amenity of the area;
  - iv.** the architectural character of the building; and
  - v.** the significance of heritage assets.
- B.** In determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.
- C.** The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:
- i.** not comprise of more than one storey;
  - ii.** not be built under an existing basement;
  - iii.** not exceed the footprint of the host building in area, except for works to create a lightwell or access to the basement;
  - iv.** be set back from neighbouring property boundaries;
  - v.** avoid the loss of garden space or trees of townscape or amenity value, i.e. from construction work or due to the creation of a new access or lightwell.
- D.** Exemptions to C(i) to C(v) above may be made on large comprehensively planned sites.
- E.** The Council will require applicants to demonstrate that proposals for basements:
- i.** do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
  - ii.** avoid adversely affecting drainage and run-off or causing other damage to the water environment;
  - iii.** have sought to offset the carbon impact of the construction of the basement by reducing energy demand across the whole of the building;
  - iv.** avoid cumulative impacts;

- v. do not harm the amenity of neighbours;
- vi. do not harm the appearance or setting of the property or the established character of the surrounding area;
- vii. protect important archaeological remains; and
- viii. ensure impacts on any green/garden space or trees are minimised and where residual impacts do arise that this is addressed through appropriate restoration and replacement.

- F. The Council will not permit basement schemes involving self-contained flats or bedrooms, bathrooms or kitchens in basements in flood risk areas.
- G. We will generally require a Construction Management Plan for basement developments.
- H. Given the complex nature of basement development, the Council expects developers to offer security for expenses for basement development to adjoining neighbours.

## Managing basement development

- 12.96** Given its potential impacts, it is important that any basement development is carried out in a way that does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems or damage the character of areas or the natural environment.

## Use of Basement Impact Assessments

- 12.97** The Council will require evidence of the impact of basement schemes in the form of a Basement Impact Assessment to be carried out by appropriately qualified professionals. Basement Impact Assessments are to include geotechnical, structural engineering, and hydrological investigations and modelling to ensure that basement developments do not harm the built and natural environment or local amenity. Basement Impact Assessments must be prepared according to the specifications set out in our supplementary planning document Camden Planning Guidance on basements and the Camden Geological, Hydrogeological and Geological Study (ARUP 2010).
- 12.98** The level of information required will be commensurate with the scale and location of the scheme. All schemes will be expected to provide evidence against each of the considerations in Policy D6 Basements. Schemes will also be expected to submit information which relates to any specific concerns for that particular scheme or location (e.g. any history of flooding at the site or in the vicinity of the site, the presence of underground watercourses, proximity to water bodies such as the ponds on Hampstead Heath, structural instability of the development or of neighbouring properties, or unstable land). Basement Impact Assessments must use the Burland Scale in estimating effects on neighbouring properties, in accordance with the details set out in our supplementary planning document Camden Planning Guidance: Basements.

- 12.99** Information submitted with basement applications must be contained within a Basement Impact Assessment which is specific to individual sites and particular proposals. Where hydrological and structural reports are required, they should be carried out by independent professionals (e.g. Chartered Structural Engineers) according to the qualifications set out in Camden Planning Guidance: Basements.
- 12.100** In order to provide the Council with greater certainty over the potential impacts of proposed basement development, we will generally expect an independent verification of Basement Impact Assessments funded by the applicant. The circumstances where verification is required include:
- where a scheme requires applicants to proceed beyond the screening stage of Basement Impact Assessment;
  - where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow;
  - where there is conflicting evidence; or
  - for any other basement applications where the Council feels that independent verification would be appropriate.
- 12.101** Basement Impact Assessments must contain a non-technical summary of the evidence that applicants have gathered against each stage of the assessment. This should be presented in a format which can be fully understood by those with no specialist technical knowledge in these matters.

## **Burland Scale**

- 12.102** Where a BIA identifies risk of damage to properties by subsidence this risk should be described using the Burland Scale. The Burland Scale methodology has been adopted for projects internationally and has been used by the Building Research Establishment and the Institution of Structural Engineers, London. The classification system of the scale is based on the ease of repair of visible damage. Subsidence is only one element in the many potential impacts assessed in a BIA and other methods will be employed when describing these other impacts.
- 12.103** In the Burland Scale the damage to properties caused by subsidence may be considered in three broad categories:
- 1. (i) visual appearance or aesthetics;
  - 2. (ii) serviceability and function; and
  - 3. (iii) stability.
- Burland Scale categories 0, 1, and 2 refer to (i) aesthetic damage, categories 3 and 4 relate to (ii) serviceability and function, and 5 represents damage which relates to stability.
- 12.104** Burland states that it is a major objective of design and construction to maintain a level of risk to buildings no higher than category 2, where there is only risk of aesthetic damage to buildings (see Burland, J. "The assessment of the risk of damage to buildings due to tunnelling and excavations", Imperial College London, 1995). However, the Council considers that neighbouring residential properties are particularly sensitive to damage, where relatively minor internal damage to a person's home can incur cost and considerable inconvenience to repair and redecorate. Applicants must therefore demonstrate in the Basement Impact Assessment that the basement scheme has a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight'.



## **Embodied carbon impact of basements**

- 12.105** The carbon intensity of basement construction can be high. In line with Policy CC5: Energy reduction in existing buildings, the Council will require schemes to include measures to offset the embodied carbon impact of a basement's construction by reducing total energy demand within the host building. This will not apply to the development of lightwells or a new access.

## **Cumulative impact of basement schemes**

- 12.106** The cumulative effect of several underground developments can be more significant than the impact of a single basement. The impacts include changes to ground water flow, land stability, surface water flow and flooding. Basement Impact Assessments must consider the potential wider impacts of basement schemes and the potential cumulative impact of other basement schemes in the area. Basement Impact Assessments must identify all relevant basements in the neighbouring area, including their extent and ground conditions and make an assessment of the combined effect of underground development with all nearby basements considered together.

## **Demolition and construction**

- 12.107** The demolition and construction phases of a development can have an impact on amenity and this can be a particular issue for basements and especially when they are located in proximity to residential properties. Construction impacts (including noise) are also controlled by non-planning legislation, in particular the Control of Pollution Act, with traffic impacts considered under relevant highways legislation. Regard should also be had to construction hours set out in adopted neighbourhood plans.
- 12.108** The Council will seek to minimise the disruption caused by basement development and will generally require Construction Management Plans to be submitted with applications. Construction Management Plans can be used to establish a community working group involving neighbouring residents to discuss, advise and make recommendations, before and during the construction period. Construction Management Plans should be based on the Construction Management Plan Proforma which is available for download from the Council's website. Please see Camden Planning Guidance: Basements for further information.

## **Basement Construction Plans**

- 12.109** To ensure that basement construction is undertaken without causing damage to neighbouring properties and the water environment the Council may require the developer to provide a Basement Construction Plan in some circumstances. Basement Construction Plans may be required when a Basement Impact Assessment shows acceptable estimated effects, but a particular construction methodology needs to be applied to ensure there is no damage to neighbouring properties. If a Basement Construction Plan is required, this will be identified in the independent assessment of the Basement Impact Assessment. Basement Construction Plans will be secured by planning obligation.

**12.110** A Basement Construction Plan sets out detailed information relating to the design and construction of the basement and provides a programme of measures to be undertaken by the owner with the objective of maintaining the structural stability of the property and neighbouring properties. The developer must also ensure that throughout the construction phase a suitably qualified engineer from a recognised professional body is engaged to monitor, inspect and approve the construction works. The detailed requirements of a Basement Construction Plan are set out in Camden Planning Guidance: Basements.

### **Size of basements**

**12.111** In addition to protecting against flooding, ground instability and damage to neighbouring buildings as set out above, the Council will also seek to control the overall size of basement development to protect the character and amenity of the area, the quality of gardens and vegetation and to minimise the impacts of construction on neighbouring properties. Basement rooms should not extend beyond the footprint of the original building and be no deeper than one full storey below ground level. The Council considers a single storey for a basement to be approximately 3 to 4 metres in height. Where appropriate we will allow a proportion of the basement to be deeper to allow development of swimming pools.

**12.112** Flexibility will be applied to allow the creation of new lightwells or enable access to a basement, but these works should be modest in scale and must be designed to minimise impacts on existing garden space and trees. Where construction works result in disturbance to natural landscaping, this should be restored or enhanced to achieve the same benefits for amenity and biodiversity as existed prior to commencement of the scheme. Any loss of trees should be compensated in line with Policy NE3: Trees. Sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees.

**12.113** Exceptions to C (i)-(iii) above may apply on large comprehensively planned sites. For the purposes of this policy, large comprehensively planned sites are:

- new major developments, for example schemes which comprise 1000sqm additional non-residential floorspace or 10 or more additional dwellings;
- large schemes located in a commercial setting; or
- developments the size of an entire or substantial part of an urban block.

### **Flood risk**

**12.114** The National Planning Policy Framework (NPPF) states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk”. Applicants will be expected to consider all sources of flood risk identified in the Council’s (emerging) Camden Strategic Flood Risk Assessment (SFRA) and in line with Policy CC11 on Flood Risk. This includes having regard to the mapped local flood risk areas.

**12.115** Within flood risk areas, the Council will not permit self-contained flats, or bedrooms, bathrooms or kitchens in basements. This is due to the risk to life (bedrooms), the risk of sewer surcharge (kitchens and bathrooms/WCs) as well as the possibility of the basement being used to provide a self-contained home.

Access to a basement must be located above the predicted flood level.

- 12.116** We will require the submission of a development-specific flood risk assessment with applications for basements within flood risk areas, unless it can be demonstrated to the Council's satisfaction that the scale of the scheme is such that there is no, or minimal, impact on drainage conditions. Basements and lower ground floors are at particular risk from sewer surcharge and backflow as their floors will often be below sewer level. We will expect applicants to protect properties, for example by the installation of a positive pumped device.
- 12.117** Where construction of a basement would reduce the area of permeable surface on the site, a Sustainable Drainage System will be required to mitigate any harm to the water environment. Further guidance on sustainable urban drainage is contained in Camden Planning Guidance: Water and flooding.
- 12.118** Some parts of Camden contain unusual and unstable subsoils, along with many underground streams and watercourses, making drainage and structural safety key concerns (including around Hampstead Heath). In such areas, applications for basement developments may be required to show through hydrological modelling whether it will be possible through the inclusion of drainage systems to prevent any significant harm from changes to groundwater levels or flow.

### **Protection of gardens and trees**

- 12.119** As set out above, the Council will seek to limit the impact of basement construction in the Borough. This will include seeking to safeguard green areas including gardens and retain and protect trees. Cumulatively, gardens can have a significant role in providing infiltration during rainfall events. Basement development should be planned to minimise disturbance to gardens or trees, including root systems. This includes trees located in the street. Large canopy trees are of particular importance. Further information on protection of trees is available in our supplementary planning document Camden Planning Guidance: Trees.

### **Listed buildings**

- 12.120** Basement development underneath a listed building can harm the fabric, structural integrity, layout, inter-relationships and hierarchy of spaces and architectural features of the building. The addition of a floor level beneath the original lowest floor level of a listed building (basement, cellar, or vault) may affect the hierarchy and historic integrity of the floor levels within the building. The development of a basement beneath a listed building can also necessitate the removal of significant parts of the original structure and fabric of the building.
- 12.121** The Council will only permit basements where they do not cause harm to the significance of a listed building or its garden. Listed buildings often form an intrinsic element of the character of conservation areas and therefore basement development which harms the special architectural and historic interest of a listed building is also likely to fail to preserve or enhance the character or appearance of the conservation area in which it is located. Further details on the Council's approach to preserving heritage assets are set out in Policy D5 Heritage.

## Lightwells

- 12.122** Where basements and visible lightwells are not part of the prevailing character of a street, new lightwells should be discreet and not harm the architectural character of the building, the character and appearance of the surrounding area, or the relationship between the building and the street. In situations where lightwells are not part of the established street character, the characteristics of the front garden or forecourt will be used to help determine the suitability of lightwells.
- 12.123** In plots where the front garden is quite shallow, a lightwell is likely to consume much, or all, of the garden area. This will be unacceptable in streets where lightwells are not part of the established character and where the front gardens have an important role in the local townscape.
- 12.124** Lightwells to the side or rear of a property should be set away from the boundary of a neighbouring property. Excessively large lightwells will be resisted.

## Security for expenses and Party Wall Act

- 12.125** The Council expects developers to offer security in all instances where basement schemes have a risk of causing damage to neighbouring property. Building owners are required to meet a number of obligations under the Party Wall etc. Act 1996 where there is excavation near a neighbouring building. These obligations include serving advanced notice of works, stating whether you will be strengthening or safeguarding the foundations of the adjoining property and providing plans and sections. Under the Party Wall Act adjoining owners may request the building owner to provide a bond or insurances to provide security in the event of a dispute. Security bonds can be provided either as part of a party wall agreement or as a separate private arrangement between the developer/ owner and the neighbour.

## Advertisements and Signage

- 12.126** This policy applies to all advertisements requiring advertisement consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Certain types of advertisements do not require advertisement consent and are regarded as having 'deemed consent' as they meet the specifications set out in the regulations. Information on what types of advertisements require consent is principally set out in The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
- 12.127** Advertisements are only controlled in respect to their effect on amenity and public safety. Further guidance on Camden's approach to advertisements is available in the Camden Planning Guidance on advertisements.

## Policy D7 – Advertisements and Signage

- A. The Council will require advertisements and signage to preserve or enhance the character of their setting and host building. Advertisements and signage must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.
- B. The Council will support advertisements and signage that:
  - i. do not impact upon public safety;
  - ii. preserve the character and amenity of the area;
  - iii. preserve or enhance heritage assets and conservation areas;
  - iv. do not contribute to an unsightly proliferation of signage in the area;
  - v. do not contribute to street clutter in the public realm;
  - vi. do not cause light pollution to nearby residential properties or wildlife habitats; and
  - vii. do not have flashing illuminated elements.
- C. The Council will resist advertisements on shopfronts that are above fascia level or ground floor level, except in exceptional circumstances.
- D. Shroud advertisements, digital advertisements, banners, hoardings / billboards / large outdoor signboards are subject to further criteria as set out in supplementary planning document Camden Planning Guidance on advertisements.

### Character and amenity

- 12.128** Advertisements and signs should be designed to be complementary to and preserve the character of the host building and local area. The size, location, materials, details and illumination of signs must be carefully considered. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment. The Council will resist advertisements where they contribute to or constitute visual street clutter; or where they an unsightly proliferation of signage in the area.

### Heritage and conservation areas

- 12.129** Advertisements in conservation areas and on or near listed buildings require particularly detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.

### Street furniture and the public realm

- 12.130** Street furniture includes objects placed on the street including traffic signs and signals, benches, street names, CCTV cameras, lighting, cycle parking, guardrails, bollards and bus shelters. The Council aims to reduce visual street clutter, reducing the number of objects on the street, rationalising their location and limiting the palette of materials. Free standing signs and signs on street furniture will not normally be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway.

## **Illumination and light pollution**

- 12.131** Advertisements should not become unduly dominant in the street scene, cause light pollution that disturbs residents at night, cause light pollution to wildlife habitats, or cause safety hazards to drivers. To achieve these aims, consideration should be given to the intensity of illumination, surface area to be illuminated and the positioning and colours of advertisements. The type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon, etc.) should be determined by the design of the building. Illuminated signs, both internal and external, should not be flashing or intermittent.
- 12.132** The illumination levels of advertisements should be in accordance with the guidance set by the Institute of Lighting Engineers PLG05 The Brightness of Illuminated Advertisements.

### **Impact on safety**

- 12.133** Advertisements will not be considered acceptable where they impact upon public safety, including when they:
- obstruct or impair sight lines to road users at junctions and corners;
  - reduce the effectiveness of a traffic sign or signal;
  - result in glare and dazzle or distract road users;
  - distract road users because of their unusual nature;
  - disrupt the free flow of pedestrian movement; or
  - endanger pedestrians forcing them to step on to the road.

### **Placement of advertisements on shopfronts**

- 12.134** Generally, shopfront advertisements will only be acceptable at the ground floor level, at fascia level or below. Fascia in this context refers to the signboard on the upper part of a shopfront showing the name of the shop. Advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties.

### **Discontinuance**

- 12.135** The Council takes a proactive approach to preserving or enhancing the townscape and public realm. Where existing advertisements with deemed consent are considered to harm the character and amenity of a building or local area the Council will, where appropriate seek removal of these advertisements, which may include serving of discontinuance notices.

### **Estate agent boards**

- 12.136** A certain number and size of estate agent boards can be erected on properties without the benefit of advertisement consent. Areas may be exempted from this deemed consent under Regulation 7 of the 1992 Regulations. In these areas no boards will be granted advertisement consent by the Council because of their effect on visual amenity, except in exceptional circumstances. Please refer to the Camden website for the list of exempted areas here.

## Shopfronts

**12.137** Shopfronts contribute greatly to the character of Camden's centres and their distinctiveness. Most of Camden's town and neighbourhood centres date back to the 19th Century and earlier, having developed from commercial activities that first took place within dwellings, although there are some significant 20th Century shopping parades. The retention of historic shop fronts and the provision of well-designed new shop fronts create a welcoming environment and attractive high streets. The Council will determine applications for new shopfronts in accordance with the Policy below.

### Policy D8 – Shopfronts

- A.** The Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features.
- B.** When determining proposals for shopfront development the Council will consider:
  - i.** the design of the shopfront or feature to ensure that the proportion, scale, style, detailing, colour and materials proposed make a positive contribution to the building and its context;
  - ii.** the existing character, architectural and historic merit and design of the building and its shopfront;
  - iii.** the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;
  - iv.** the general characteristics of shopfronts in the area;
  - v.** community safety, lighting and the contribution made by shopfronts to natural surveillance; and
  - vi.** the degree of accessibility to all users.
- C.** The Council will resist the removal of shop windows without a suitable replacement and will ensure that where shop, service, food, drink and entertainment uses are lost, a shop window and visual display is maintained.
- D.** Where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention. Where a new shopfront forms part of a group where original shop fronts survive, its design should complement their quality and character.

### Protecting existing shopfronts

**12.138** Shopfronts form an essential part of the character and attractiveness of many areas in Camden, in particular its centres, and contribute to the creation of vibrant streets and public spaces. The Council will seek to protect existing shopfronts that make a significant contribution to the appearance and character of an area, for example through their architectural and historic merit. We will also consider the need to keep the appearance of the shopfront, taking into account the quality of its design, its historic importance and its location. Good examples of shopfronts should be retained wherever possible.

**12.139** A number of Camden's centres lie within conservation areas. The Council has prepared conservation area statements, appraisals and management strategies for these which set out detailed information on the area and its character and the Council's approach to their preservation and enhancement, including, where relevant, shopfronts.

### **Design of new shopfronts**

**12.140** The quality of shopfronts and the way in which they relate to their surroundings make an important contribution to the character and attractiveness of an area. The Council will therefore seek to ensure that new shopfronts are of a high quality and are sensitive to the area in which they are located. Transparent shopfronts will be sought for units containing shops and other town centre uses, due to the contribution that they make to the vitality and attraction of centres.

**12.141** The Council considers that the attractiveness of shopfronts can usually best be maintained by taking inspiration from the architecture of the building and neighbouring premises and reflecting the general scale and pattern of shopfront widths in the area. New shopfronts should contribute towards the maintenance of a cohesive streetscape appearance, retain a consistent building line and contribute to the character and attractiveness of the centre they are located in. As shopfronts are seen at close quarters, the detailing, type and quality of materials, execution and finishes are very important. Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all.

### **Replacement shopfronts**

**12.142** If a shopfront is replaced or altered, the design should respect the characteristics of the building and, where appropriate, shopfront windows and framework features, such as pilasters, fascias and console brackets, should be retained or restored. Careful consideration will be given to proposals for excavating or re-opening lightwells in front of shopfronts, particularly those in a group, as they can affect the cohesiveness of a frontage.

**12.143** Folding or opening shopfronts will not generally be acceptable, as they can create a void at ground level that can harm the appearance of a building and can also have a negative impact on local amenity, for example in terms of noise and disturbance.

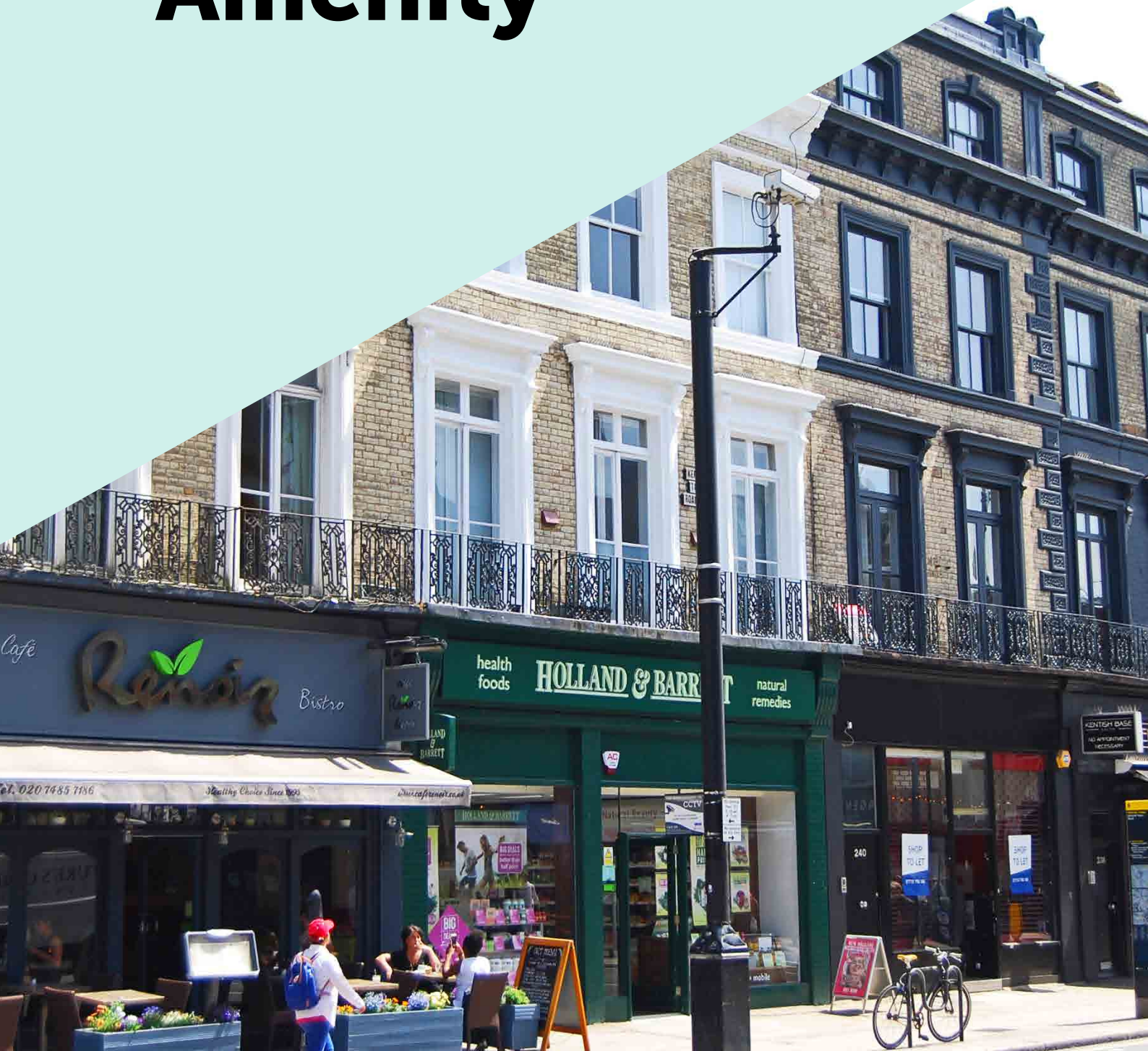
### **Shop windows**

**12.144** Shop windows provide views into and from premises and can help bring activity and enhance feelings of security by providing natural surveillance. Displays in shop windows can add to the attractiveness of a premises and the vitality and attraction of the centre. Security features associated with shop window displays should be internal in order to avoid harming the appearance of shop premises and creating clutter. Solid shutters are only considered to be acceptable in exceptional cases as they are unsightly and can generate feelings of insecurity in those walking by, hide internal intruders and encourage graffiti.



- 12.145** Lighting from shop windows can help to increase security after dark. The Council may therefore seek the maintenance of some shopfront lighting overnight, where appropriate, particularly in areas identified as having high levels of crime. However, this lighting should be well designed so it does not cause light pollution.
- 12.146** The Council discourages shop window displays and graphics that completely obstruct views into the shop (for example vinyl graphics applied to the window). The layout of shop units should be designed to overcome the need for excessive window graphics, for example to hide shelving. Camden Planning Guidance on design provides more detail on the Council's approach to the design of shopfronts.

# Protecting Amenity



# Chapter 13: Protecting amenity

- 13.1** Standards of amenity (the features of a place that contribute to its attractiveness and comfort) are significant factors in the health and quality of life of the borough's residents, families, workers, and visitors, and are fundamental to Camden's attractiveness and success. Camden's inner London location, the proximity of various uses, and the presence of major roads and railways means that amenity is a particularly important issue within the borough.
- 13.2** This policy therefore seeks to ensure that standards of amenity are protected for all. Other policies within the Plan also contribute towards protecting amenity by setting out our approach to specific issues, such as Policy A4 Noise and vibration and Policy A3 Air quality.

## Policy A1 – Protecting Amenity

- A.** The Council will seek to protect the quality of life of future and existing occupiers and neighbours in Camden. We will grant permission for development unless this causes unacceptable harm to amenity. The Council will:
- i.** seek to ensure that the amenity of communities, occupiers and neighbours is protected;
  - ii.** seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
  - iii.** resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
  - iv.** require mitigation measures where necessary.
- B.** When assessing planning applications, the factors that the Council will consider include:
- i.** privacy, overlooking and outlook;
  - ii.** sunlight, daylight and overshadowing;
  - iii.** impacts of artificial lighting levels;
  - iv.** transport impacts, including the impact on the public transport network, and the need for Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
  - v.** the cumulative impacts of the construction phase, including potential impact on, and damage to, highway assets, and the need for Construction Management Plans;
  - vi.** noise and vibration levels;
  - vii.** odour, fumes and dust;
  - viii.** microclimate;
  - ix.** contaminated land; and
  - x.** impact upon water and wastewater infrastructure.

- 13.3** Protecting amenity is a key part of successfully managing Camden's growth and ensuring its benefits are properly harnessed.

- 13.4** The Council will expect all forms and scales of development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties and take appropriate measures to mitigate potential impacts on amenity where necessary.
- 13.5** Early consideration of neighbourly matters will be encouraged through pre-application advice and/or design panel review, and as part of the design and planning stages for large sites, where detailed designs are proposed, to be addressed at a later stage.
- 13.6** Planning applications should be accompanied by information that is sufficient to make adequate assessment against the required guidance and standards. Where necessary, measures will be secured by condition and/or legal agreement.
- 13.7** Further information on the environmental standards and design guidance which should assist applicants to protect and achieve standards of amenity, and in turn help assess a developments' neighbourliness, is set out in the Camden Planning Guidance on amenity.

### **Privacy, overlooking and outlook**

- 13.8** A development's impact upon privacy, overlooking and outlook can be influenced by its design and layout. These issues can affect the amenity of existing and future occupiers. The Council will expect that these elements are considered at the design stage of a scheme to prevent potential harmful effects from the development on occupiers and neighbours. Further detail can be found within our Camden Planning Guidance on amenity.

### **Sunlight, daylight and overshadowing**

- 13.9** Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011). Further detail can be found within our Camden Planning Guidance on amenity.
- 13.10** Any proposal with potential to negatively impact on the existing levels of daylight/sunlight of other land uses near the application site, including gardens and amenity spaces, and major applications, will be expected to be accompanied by a Daylight and Sunlight Assessment prepared in line with the methods described in the Building Research Establishment's (BRE) "Site layout planning for daylight and sunlight: A guide to good practice" 2011.

### **Artificial lighting levels**

- 13.11** Camden's dense character means that light pollution can be a bigger problem in the borough than in lower density areas where uses are not so close together. Artificial lighting should only illuminate the intended area and not affect or impact on the amenity of neighbours.

- 13.12** Developments in sensitive areas, such as those adjacent to sites of nature conservation, and proposals involving the installation of external lighting or floodlighting should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife, demonstrated through the submission of a Lighting Assessment.
- 13.13** For further information on examples of sources of artificial light nuisance, where planning permission is required, what information should accompany planning applications and what matters to consider when designing lighting, please see our Camden Planning Guidance on amenity.

### **Transport impacts**

- 13.14** The Council will consider information received within Transport Assessments, Travel Plans and Delivery and Servicing Management Plans to assess the transport impacts of development. Guidance regarding these documents is available within our Camden Planning Guidance on transport. In instances where existing or committed capacity cannot meet the additional need generated by the development, the Council will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts.
- 13.15** Proposals should make appropriate connections to highways and street spaces, in accordance with Camden's road hierarchy and Transport for London's Street Type Framework, and to public transport networks. Any development or works affecting the highway will also be expected to avoid disruption to the highway network, particularly emergency vehicle routes, and avoid creating a shortfall to existing on-street parking conditions, or amendments to Controlled Parking Zones. To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever possible. Major developments dependent upon large goods vehicle deliveries will also be resisted in predominantly residential areas. Further details regarding the movement of goods and materials is available within Policy T6 Sustainable movement of goods and materials.
- 13.16** Highway safety, with a focus on vulnerable road users should also be considered, including provision of adequate sightlines for vehicles leaving the site. Development should also address the needs of vulnerable or disabled road users.
- 13.17** Highway works connected to development proposals will be undertaken by the Council at the developer's expense. This ensures that highway works, maintenance and materials adopted by the Council are constructed to an appropriate standard. This includes highway works that form part of a planning approval appropriate for adoption, including the design and implementation of new routes to be adopted, owned and managed by the relevant Highway Authority. Development requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces. Separate arrangements will apply to any works on roads managed by Transport for London.

## Construction Management Plans

- 13.18** The Council will require all major planning applications (10 residential units or more or for sites of 1000 sq. m or more) to produce a Construction Management Plan post-approval, with the need for a Construction Management Plan for minor developments determined on a case-by-case basis, depending on the nature of the proposed construction works, the site location and surrounding context. Construction Management Plans will be secured via planning obligations and should be submitted after a planning application is approved, and before a development commences.
- 13.19** As part of the preparation of a Construction Management Plan, the Council require applicants to identify the potential impacts of the planned construction activity and to propose appropriate mitigation measures. A neighbourhood consultation process must also be undertaken prior to submission of the first draft of the CMP.
- 13.20** The level of detail provided in a Construction Management Plan should be proportionate to the scale and/or complexity of the development. To assist developers in providing the right information, the Council has created a Construction Management Plan Pro-forma which is tailored towards the specific needs of the borough.
- 13.21** For major applications and developments that the Council consider would have a significant impact on amenity, a construction working group should be established to discuss, advise and, where appropriate, make recommendations to the developer in relation to the build and preparation of the CMP.
- 13.22** The Council will also expect developers to sign up to the Considerate Constructors Scheme and Construction Logistics and Community Safety (CLOCS) monitoring and adhere to the Guide for Contractors Working in Camden. Construction implementation contributions and monitoring fees will be apply to each development. A Construction Management Bond is held by the Council from the developer, which is returned on completion of the works if there has been no breaches with the CMP.
- 13.23** The Council inspects CMP sites through to completion and it is a requirement that Council officers are given access to development sites when requested for planned or unannounced inspections. Further information on CMPs is contained within the Camden Planning Guidance on Amenity.

## Noise and vibration

- 13.24** Noise and vibration can have a significant effect on the environment, and on the health and quality of life enjoyed by communities and individuals. Development coming forward in Camden should therefore have regard to Policy A4 Noise and Vibration and our Camden Planning Guidance on amenity.
- 13.25** Developers will be required to comply with the Control of Pollution Act 1974 Sections 60 and 61 for the control of noise and vibration arising from construction activities.

## **Odours, fumes and dust**

- 13.26** Dust, odours, and fumes can be generated from construction and demolition activities, as well as from commercial cooking and industrial process. Greater exposure to air pollution has the potential to cause a range of health problems, including affecting lung function and the worsening of medical conditions such as asthma and heart disease.
- 13.27** Construction and development activity produces local air pollution which poses a particular risk for those in close proximity to construction sites or areas of high development, as well as to those working within the construction industry itself. The selection of construction and demolition methods, and the comprehensiveness of mitigation measures, has a significant influence on the magnitude of air pollution emissions and health risk.
- 13.28** Camden Council require all development likely to generate air pollution and nuisance odours to implement appropriate mitigation measures, such as extraction and onsite dampening during dust generating activities, as well as suitable air quality monitoring, in line with the Greater London Authority (GLA) and London Councils' Best Practice Guidance 'Control of dust and emissions during construction and demolition' SPG. These should always be incorporated during the construction and demolition phases of the development. External extraction equipment and ducting should be sited sensitively and away from local receptors, particularly on listed buildings and within conservation areas. Further details can be found in our Camden Planning Guidance on design, and amenity.
- 13.29** The Council will limit the disturbance from dust due to construction and demolition by expecting developers and their contractors to follow the Greater London Authority and London Councils' Best Practice Guidance: The control of dust and emissions from construction and demolition. Details of how these measures will be implemented should be provided in a Construction Management Plan. Further information regarding the management of dust can be found within Policy A3 Air quality.

## **Microclimate**

- 13.30** Large developments can alter the local climate. Buildings can affect the flow of air and cause wind tunnels which can potentially affect the enjoyment of public spaces. A building's colour can affect how much heat it absorbs and therefore impact upon local air temperatures. Developments should therefore consider local topography and the local microclimate in their design. Developments large enough to alter the local climate will be required to submit a statement demonstrating how the design has considered local conditions. Further detail can be found in our Camden Planning Guidance documents on sustainability and amenity.

## **Contaminated Land**

- 13.31** Development on contaminated land can expose people to a wide range of potential health risks. Examples of sites that may have contaminated land include those that have been used for vehicle repair, industrial processes and petrol stations. The Council will expect proposals for the redevelopment of sites that are known to be contaminated, have the potential to be contaminated, or are

located in close proximity to such sites, to submit relevant assessments and take appropriate remedial action to the Council's satisfaction if required.

- 13.32** Remedial action is particularly important in developments where people will have access to the ground for gardening, play or planting food for consumption. Please refer to our Contaminated Land team and our Camden Planning Guidance on amenity for further information.

### **Water and wastewater infrastructure**

- 13.33** The Council will work with water providers to ensure that there is adequate water and wastewater infrastructure serving developments likely to put pressure on existing water infrastructure. Developers may be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to reductions in water pressure, sewer flooding or overloading of existing water and wastewater infrastructure. Where there is an infrastructure capacity constraint and no improvements are programmed by the water provider, we will use planning conditions and/or obligations requiring developers to provide secure mitigation and compensatory measures which must be completed prior to occupation of the development. Further information regarding flood risk, drainage and water supply can be found within Policies CC11 (Flooding) and CC12 (Drainage) and further detail regarding obligations can be found within our Camden Planning Guidance on developer contributions.

## **Safety and Security**

- 13.34** Crime and the fear of crime can undermine people's quality of life, health and wellbeing. Planning can play an important role in reducing crime and helping to create safe, strong and open communities. Our challenge is to make the borough a safer place for everyone, while making sure that Camden maintains the vibrancy that contributes so much to its character and success.
- 13.35** We know that everyone experiences places differently and that some groups with protected characteristics may feel more vulnerable using certain spaces, at certain times of the day. Development should aim to create a safe and secure environment and provide a sense of security for all users, to support good health and wellbeing and promote inclusion.

## **Policy A2 - Safety and Security**

- A.** To create a safer borough for all, the Council will require development to:
- i.** incorporate design, layout, and access measures to contribute to community safety and security, particularly in wards with relatively high levels of crime;
  - ii.** give consideration to designing out crime and anti-social behaviour at an early stage in the planning process. Major planning applications must be accompanied by a Crime Impact Assessment, which should demonstrate that any impact on crime and antisocial behaviour has been considered, addressed and, where appropriate, designed out;
  - iii.** be designed to include the following measures, where appropriate:
    - a.** overlooking of public spaces (to enable passive and natural surveillance);



- b. active frontages and frequent entrances at ground floor;
  - c. clearly defined boundaries between public and private spaces;
  - d. effective lighting, which is sensitive to the context;
  - e. direct and accessible routes that are easy to navigate, with good visibility and clear sight lines, from and through developments, spaces and/or buildings;
  - f. clear signage;
  - g. minimal clutter;
  - h. materials that are robust, durable, and resistant to malicious damage; and
  - i. security measures which are proportionate to their use and function and avoid hostile and reactive measures.
- iv. be designed, managed and maintained to create an inclusive environment, that avoids or minimises real and perceived danger as far as possible, and acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently;
  - v. address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres, and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design;
  - vi. address resilience to terrorism and natural hazards in a manner which is proportionate to the threat and the size and nature of the development and is appropriate to the context; and
  - vii. mitigate potential suicide risks associated with the built environment, particularly in relation to tall buildings and structures, and transport infrastructure.
- B.** Applicants must evidence how they have addressed safety and security in their development proposal, as part of the Design and Access Statement submitted with their planning application. This should also include details of suicide prevention measures included within the scheme.

## Design and Security

- 13.36** Development in the borough provides the opportunity to implement measures to improve community safety, particularly where development takes place in areas with relatively high levels of crime and antisocial behaviour such as the King's Cross, Holborn and Covent Garden, Camden Town, and Bloomsbury wards.
- 13.37** Consideration of how crime, disorder and fear of crime can be addressed is an important element of good design. This can create safe and attractive places to live and work, reduce the opportunity for crime and allow for better maintenance and management of buildings and spaces. The Council will require all developments to incorporate appropriate design, layout and access measures to help reduce opportunities for crime, the fear of crime and to create a more safe and secure environment, that meets the needs of Camden's diverse communities, acknowledging that different groups within the population use spaces differently.
- 13.38** The Council will require a Crime Impact Assessment to be submitted with all applications for major developments (10 residential units or more or for sites of 1000 sq. m or more). This should be included as part of the Design and Access

Statement for the development and demonstrate that any impact on crime and antisocial behaviour has been considered, addressed, and where appropriate, designed out. Smaller applications will also be expected to demonstrate that safety measures have been incorporated into the scheme through the Design and Access statement. Information on what should be included in a Crime Impact Assessment and/or Design and Access Statement is set out in the Camden Planning Guidance on design.

- 13.39** In designing developments, applicants should ensure that security features are considered and incorporated into a scheme from the start of the design process. Care should be taken to ensure that the security features proposed are proportionate and complement other key design considerations, as part of a holistic approach to designing and maintaining inclusive and safe environments for all. Further information on the design of security features is set out within Policy D1 Achieving Design Excellence, Policy D8 Shopfronts and the Camden Planning Guidance on design.

### **Food, drink and entertainment uses**

- 13.40** Camden's food, drink and licensed entertainment premises and night-time economy contribute to the attractiveness and vibrancy of the borough but where there is a concentration of late-night activity, there can also be a range of problems such as noise and disturbance, littering, antisocial behaviour, crime, and violence. For many centres, the variety provided by a mix of uses is important for sustaining their draw and interest. The cumulative impact of these uses will therefore be assessed in line with the Council's town centre, amenity and noise/vibration policies.
- 13.41** Management and maintenance plans with owners and operators of food, drink and licensed entertainment premises will be secured by planning condition and/or Section 106 Agreement, to ensure that the areas outside of premises are appropriately managed. Further information regarding food, drink and entertainment uses and where these may be acceptable is set out in our Camden Planning Guidance documents on retail and town centres, and employment.
- 13.42** Where an otherwise acceptable development could have potentially negative impacts on local community safety and security, either through its uses, hours of operation, or its design, the Council will require the developer to undertake or fund appropriate site related works or measures to minimise these impacts, which may be secured through a Section 106 Agreement (which could take the form of a financial or non-financial contribution). Camden's Planning Guidance on design provides further detail on this.

### **Counter Terrorism**

- 13.43** Camden's position in the centre of a major international city, its high profile major transport interchanges and famous buildings and places make resilience to terrorism an important issue in some areas of the borough. If necessary, the Council will therefore work with the Ministry of Defence's Strategic Planning Team and local security advisors and consider the most up-to-date information provided regarding potential security risks.

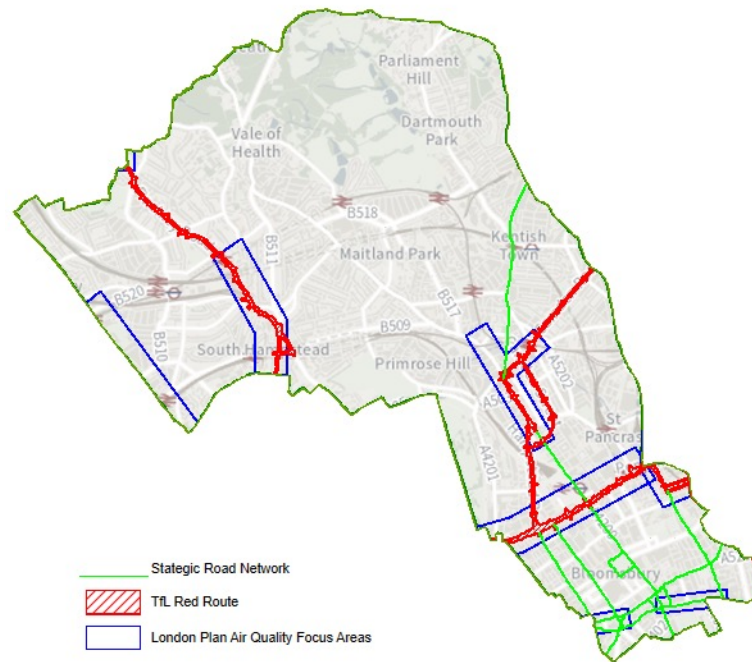
## Suicide risk

- 13.44** Suicide is a significant public health issue, with more than 6,000 people in Great Britain taking their own lives in 2021 . The risk of suicide is not equal however. Men are three times more likely to die by suicide than women; with the highest suicide rate in England being among men aged 45-49. People in the lowest socio-economic group and living in the most deprived geographical areas are also ten times more at risk of suicide than those in the highest socio-economic group living in the most affluent areas.
- 13.45** In Camden there were 76 suicides over the period from 2018 – 2020. Around a third of all suicides take place outside the home, in a public location. Planning therefore has an important role preventing suicides, by ensuring that suicide prevention measures are incorporated into the design of all new buildings, public spaces, bridges and other infrastructure projects, at the earliest stage, to improve their safety.
- 13.46** Applicants should consider the risk of suicide within a proposed development and consult the practice resource Preventing suicides in public places [hyperlink: <https://www.gov.uk/government/publications/suicide-prevention-suicides-in-public-places>] at an early stage in the design process. This is particularly important for tall buildings and structures, and transport infrastructure.
- 13.47** Design measures could include restricting access to the site and/or the means of suicide, increasing opportunity and capacity for human intervention, and increasing opportunities for help sought by the suicidal individual.
- 13.48** Applicants will be expected to evidence what suicide prevention measures they have included in their scheme as part of the Design and Access Statement for the development. Applicants should consider the risk of suicide when undertaking a Health Impact Assessment, in accordance with Policy SC1 Health and Wellbeing.

## Air Quality

- 13.49** Improving local air quality, mitigating the impact of development on air quality, and reducing exposure to poor air quality, is vital to safeguard the health of Camden's communities and environment. Long-term exposure to air pollution is estimated to cause as many as 36,000 premature deaths in the UK each year. Whilst air pollution can affect everyone's health, at any stage in our lives, certain groups, including: children and young people, older people, and people with existing lung or heart conditions, are more clinically vulnerable, and can suffer more severe health effects as a result.
- 13.50** The whole of Camden is defined as an Air Quality Management Area (AQMA) which was declared by the Council in 2002 to address nitrogen dioxide and particulate matter pollution. The Greater London Authority has identified five Air Quality Focus Areas in Camden (along the Euston Road, Swiss Cottage/Finchley Road, Kilburn High Road, Camden High Street, and Holborn), as these are the places where the problem of high levels of air pollution and human exposure is most acute.

## Map 15: Air Quality Focus Areas



**13.51** Camden has committed to achieving the revised World Health Organization air quality guidelines (see Camden Clean Air Strategy) in response to scientific evidence about the impact of air pollution on health. The Camden Clean Air Action Plan contains Clean Air Outcomes which describe specific short and medium-term interventions to improve air quality and protect public health in the borough. Policy A3 below supports the objectives of the Council's Clean Air Strategy and seeks to ensure that new development contributes to improving air quality in Camden.

### Policy A3 - Air Quality

- A.** The Council will expect development to contribute to improving air quality in Camden to protect public health. The Council will:
- i.** Require all development to be at least air quality neutral in accordance with the London Plan and associated guidance. An air quality positive approach is encouraged.
  - ii.** Require the following types of development to submit an Air Quality Assessment, where requested by the Council, the Air Quality Assessment must be supported by detailed air quality modelling:
    - a.** All major developments;
    - b.** Any development that introduces sensitive uses or occupiers into an area of poor air quality;
    - c.** Development that involves significant demolition, construction and/or earthworks;
    - d.** Any development that could have a significant impact on air quality, either directly or indirectly; or
    - e.** Any development involving a biomass or gas Combined Heat Plant (including connections to existing networks where the increased capacity is not already covered in an existing Air Quality Assessment).

- iii. Require all development to use design solutions to reduce exposure to existing poor air quality and address local problems of air pollution.
- iv. Resist applications for sensitive uses (such as childcare, schools or accommodation for elderly people) in areas of particularly poor air quality.
- v. Resist developments that introduce sensitive uses (e.g., housing) in locations of poor air quality, unless they are designed to substantially mitigate the impact.
- vi. Require all development to demonstrate how they plan to meet the GLA emission standards for Non-Road-Mobile-Machinery. We will apply the emission standards for the Central Activities Zone across the whole borough.
- vii. Require applicants to consider emergency backup power for development sites (in the operational phase) early in the design process. Non-combustion solutions are expected.
- viii. Resist proposals for solid / wood burning heating or catering systems.
- ix. Require applicants to give consideration to the actions identified in the Council's Air Quality Action Plan when designing and delivering development.
- x. Require applications including commercial cooking to demonstrate how they will mitigate their impact on air quality.

### **Air quality neutral**

- 13.52** Air quality neutral assessments seek to ensure that emissions from a completed development are no greater than from the previous use. GLA Air quality neutral guidance states how an Air Quality Neutral assessment should be made for applicable developments.
- 13.53** Most major development applications will be required to submit an Air Quality Neutral assessment, with the exception of developments that do not include additional emissions sources.
- 13.54** Other development types will need to submit, but may be able to use, a simplified Air Quality Neutral Assessment where they increase the number of homes between 1 and 9; or include a floor area of less than 1,000sqm (non-residential), but these may also be excluded if they do not include additional emission sources. Please refer to the latest GLA guidance, and the assessment method.

### **Air Quality Assessments**

- 13.55** An Air Quality Assessment (AQA) is an assessment of the impact of a development on the levels of certain pollutants in a local area. It determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality. The Air Quality Assessment should also consider wider cumulative impacts on air quality arising from several smaller developments.
- 13.56** A screening assessment or basic AQA should be undertaken in accordance with criteria (ii) in Policy A3 above. This should include:
  - Operational impact of development on local area
  - Air Quality Neutral assessment
  - Operational impact on occupants
  - Construction impacts risk assessment
  - Air Quality Positive Assessment (for developments requiring an Environmental Impact Assessment)

- 13.57** A detailed AQA will be required if the scheme:
- brings air quality impacts;
  - introduces new sensitive occupiers into an area of poor air quality.
  - Modelling must be undertaken in accordance with London Local Air Quality Management Technical Guidance.

- 13.58** Air Quality Assessments should:
- assess local air quality pollutants and dust;
  - assess the current baseline situation in the vicinity of the proposed development; and
  - predict the future impact of operation, both with and without the proposed development, but including all consented development, by calculating statistics that can be compared with air quality objectives (modelling should not predict improvements to future years, future vehicle emissions or future background concentrations).

- 13.59** Further information about how air quality assessments should be undertaken are contained in our Camden Planning Guidance on Air quality.

## Reducing exposure

### Design

- 13.60** The location of a development has a direct influence on exposure to elevated air pollution levels. This is particularly relevant where developments include sensitive uses such as hospitals, schools and children's playgrounds. Suitable building design, layout and orientation can avoid increasing exposure whilst minimising energy demand and energy loss.
- 13.61** Indoor air quality needs early consideration in building design. Ventilation inlets, flues, and opening windows should be located on higher floors, away from sources of air pollution at ground level, and also from stationary sources of plant.
- 13.62** The location of outside space is also an important consideration in scheme design and any exposure of gardens and roof terraces to poor air quality should be screened and, where practicable, minimised through appropriate positioning and orientation. Applicants should also take care not to locate flues and exhaust vents near recreational areas such as roof terraces or gardens.
- 13.63** Development sites which are likely to have high levels of air pollution and exposure should undertake air quality modelling at the earliest possible opportunity to inform the design of the scheme, necessary mitigation measures, and location / placement of sensitive uses, such as housing, schools, nurseries, care homes, hospitals and children's play areas. The design should also make provision to address local problems of air pollution.

### Demolition and construction

- 13.64** Construction and development often involve the use of large machines such as excavators, piling rigs, and cranes, and these are typically powered with diesel engines (emitting diesel particulate, sulphates and NOx). Due to the scale of many

construction sites, this machinery is often employed for a significant period, resulting in the prolonged emission of air pollutants over multiple years.

- 13.65** Development sites should seek to utilise mains power as much as possible rather than needing to power machinery and site facilities with diesel or other polluting fuels. This should be explored at the earliest opportunity to maximise the benefits for air quality and the potential for carbon emissions reduction. The non-road mobile machinery emission standards are outlined on the GLA's website, and linked to London Plan policy SI1 Improving air quality. Currently the NRMM Low Emission Zone requires that all engines with a power rating between 37 kW and 560 kW meet an emission standard based on the engine emission "stage". Camden is extending the engine emission stage of Camden's part of the Central Activities Zone to the whole borough, which follows the GLA's intention of moving towards zero emission machinery by 2040, and actions proposed in the Council's Clean Air Action Plan 2023 - 2026. Further guidance is set out in the Greater London Authority's Control of Dust and Emissions During Construction and Demolition supplementary planning guidance. Developers should also register Non-Road Mobile Machinery on the Greater London Authority website.
- 13.66** Crushing, cutting, grinding, drilling and breaking concrete and other materials produces airborne particulates, while excavation, earthworks, and open-air storage of rubble or demolition waste can lead to wind-blown dust, adding to local air pollution levels.
- 13.67** To monitor the impact of construction activities on air quality, we may require monitoring, before and during the construction and demolition phases. The level of risk should be assessed in line with GLA guidance, Control of Dust and Emissions. Medium risk schemes usually require a minimum of two real time monitors, while high risk schemes usually require four. The choice of locations and positions (to be agreed by the Local Authority) must clearly be demonstrated on the basis of identified nearby uses, the prevailing atmospheric conditions, off-site emission sources, local topography, and the relevant dust-generating site activities. Baseline monitoring would normally be required for at least 3 months (ideally 12 months) prior to commencement, and the results used to inform interpretation of construction phase monitoring and any actions required to be taken to avoid exceedances. The Council may seek a financial contribution from major development towards the management and implementation of compliance monitoring, assessment and investigation. This would be secured through a s106 agreement and would be commensurate to the scale and risk of the development project.

### Emergency generators

- 13.68** Emergency backup power for development sites (in operational phase) should be considered early in the design process and non-combustion solutions are expected. Diesel or other liquid fuel backup power systems should be considered only as an absolute last resort due to their disproportionately significant impact on local air quality from routine testing, which, aggregated across the numerous sites with fossil fuel backup generators in the borough, poses a serious risk to public health. If fossil fuel backup generators are installed, they must conform to the emission limit values for new plant in the Medium Combustion Plant Directive.

## Commercial cooking

- 13.69** Commercial cooking is the single biggest source of PM2.5 emissions in Camden. Charcoal grills, wood fired ovens, deep-fat frying, and gas stoves and ovens all produce significant amounts of air pollution. Considering that commercial kitchens are operational for many hours each day, a reduction in pollution emissions from commercial cooking would have significant benefits for air quality in Camden. Mitigation measures could include filtration technologies or alternative cooking techniques.

## Noise and Vibration

- 13.70** Noise and vibration can have a significant effect on the environment, and on the health and quality of life enjoyed by communities and individuals. Exposure to noise can lead to effects including sleep disturbance, poor cardiovascular health, and poor mental health. Camden's high density and mixed-use nature means that exposure to noise and vibration is a particularly important issue in the borough.
- 13.71** This policy seeks to ensure that noise and vibration is appropriately considered at the design stage of developments, and that noise and vibration sensitive uses are not detrimentally impacted by noise and vibration, and that existing uses (such as music venues, theatres and some employment uses) are not unduly restricted through the introduction of nearby sensitive uses. The policy also supports retrofitting measures, where appropriate.

## Policy A4 - Noise and Vibration

- A.** The Council will seek to ensure that noise and vibration is controlled and managed to avoid significant adverse impacts on health and quality of life. The Council will:
- i.** require the submission of a Noise and Vibration Impact Assessment where uses sensitive to noise and vibration are proposed close to an existing source of noise, or when development is likely to generate noise. In assessing applications, the Council will have regard to the noise and vibration thresholds, set out in Appendix 3, and other relevant national and regional policy and guidance and British Standards;
  - ii.** ensure that where noise mitigation is required, this is incorporated into the proposed development at the design stage of the planning process;
  - iii.** require developments that are sensitive to noise and vibration to mitigate the impact of, and protect occupiers against, existing sources of noise and vibration in accordance with the 'Agent of Change' principle;
  - iv.** resist development likely to generate unacceptable noise and vibration impacts;
  - v.** only grant permission for noise and vibration generating development, including any plant and machinery, where the applicant can demonstrate, to the Council's satisfaction, that it can be operated without causing harm to amenity;
  - vi.** support retrofitting measures to existing noise and vibration generating sources, and uses sensitive to noise and vibration, to minimise the impact of noise and vibration on occupiers; and
  - vii.** seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.



## Sources and Character of Noise in Camden

- 13.72** The main sources of noise and vibration in Camden are road traffic, railways, industrial uses, plant and mechanical equipment, food, drink and entertainment uses, and building sites. The top six sources of noise that receive the most complaints in Camden are: music, construction noise, general people noise (e.g., footsteps, gathering), parties, fixed machinery and burglar alarms. There is a proliferation of fixed machinery, such as air conditioning units, in Camden's centres which cumulatively can have a harmful impact. Noise and vibration sensitive uses include housing, schools and/or libraries, hospitals, offices, workshops, laboratories, hotels, open spaces and amenity spaces.
- 13.73** The borough is also home to a large number and variety of food, drink and entertainment uses, often close to where people live, and as a result, conflicts can arise. Such sources of noise and the character of noise can increase stress levels and cause significant disturbance. Other sources of noise such as those associated with construction are considered in Policy A1 Protecting Amenity, whereby measures required to attenuate impacts are secured by legal agreement through a Construction Management Plan.

## Assessing the impact of noise and vibration

- 13.74** The aim within development proposals should be to design out noise prior to proposing mitigation. The effect of noise and vibration can be minimised by separating uses sensitive to noise and vibration from sources that generate them and by taking other design and operational measures to reduce any impact.
- 13.75** Where uses sensitive to noise and vibration are proposed close to an existing source of noise or vibration, or when development which is likely to generate noise or vibration is proposed, the Council will require an acoustic report to accompany the application. In assessing applications, the Council will have regard to the noise and vibration thresholds, set out in Appendix 3, and other relevant national and regional policy and guidance and British Standards.
- 13.76** When a planning application is submitted, an acoustic report should accompany the application where any of the following are proposed:
- plant, ventilation, air extraction or conditioning equipment and flues.
  - uses likely to create significant noise such as food/ drink/ entertainment and leisure uses, industrial uses, day nurseries, places of worship, schools and colleges.
  - a noise-sensitive use located in noisy environment.
  - uses likely to generate a significant amount of traffic (defined as road traffic movements greater than 5% of Annual Average Daily Traffic).
  - developments emitting low frequency noise (e.g., electricity substation).
  - Environmental Impact Assessment (EIA) development.
- 13.77** The Council's Camden planning guidance on amenity provides further information on how to minimise the impact of noise on developments; ways to mitigate noise emitted from developments and further detail on how the Council will assess the impact of noise and vibration.

- 13.78** Noise generating uses and fixed machinery will likely have a greater impact on amenity when the background noise level is lower or in areas where noise sensitive uses such as residential developments co-exist with other uses. The Council will take into consideration the general character of the noise (whether noise is intermittent, has a distinct screech, bang, hiss) and where appropriate, the cumulative impacts of noise from one or more noise sources and will assess whether tighter noise restrictions, secured by planning condition, should be imposed.
- 13.79** The Council will only grant planning permission for development sensitive to noise and vibration, in locations that experience high levels of noise and for development likely to generate noise impacts, if appropriate attenuation measures can be provided. Such attenuation measures should be included in the information submitted with a planning application and mitigation measures will be secured through planning condition and/or legal agreement, where necessary.
- 13.80** In cases where noise sensitive development is proposed near an existing noise generating use (such as music venues and pubs) the Council will determine whether the introduction of the sensitive use will be harmful to the existing premises continued operation. In some cases, the Council may require the developer to be responsible for future costs of soundproofing (known as the “agent of change” principle), secured by a legal agreement.
- 13.81** The Council will also consider the impact of attenuation measures on the character and appearance of the building and locality, in accordance with the relevant design policies in the plan (see Policy D1 Achieving Design Excellence and associated Camden Planning Guidance on design).

### **Agent of change principle**

- 13.82** In accordance with the London Plan, the agent of change principle places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed new sensitive development.
- 13.83** The Council will apply the agent of change principle to all established noise generating activities, especially when new developments are proposed nearby. Development should be designed to ensure that established noise generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- 13.84** The noise and nuisance mitigation proposals for a development should consider the particular features of music venue noise, including the low frequency spectral content and the enhanced sensitivity of people during night-time periods. Noise impacts may arise at noise levels that are relatively low, as such, it is important to set robust design criteria in consultation with the Council prior to an application being submitted. Applicants should ensure that the proposed mitigation measures are feasible and can provide the required level of performance, when subjected to constraints faced during the implementation of the measures. All potential conflicts between noise sensitive uses and existing noise sources must be resolved at the planning stage, prior to approval.

- 13.85** Where a new commercial use, likely to generate noise, adjoins an existing residential building (and vice versa); and/or a change of use will result in a residential development being sited in a noisy environment, the Council is likely to use planning conditions requiring substantially enhanced sound insulation of relevant walls, floors and ceilings compared to the minimum specifications of the Building Regulations.
- 13.86** Where a development sensitive to vibration is proposed in an area that vibration is anticipated to be present, an appropriate vibration survey should be carried out. Where vibration levels exceed those set out in the appendices the proposal should demonstrate that vibration can be mitigated to acceptable levels.

### **Food, drink, entertainment and leisure noise**

- 13.87** Within each of Camden's centres, the Council will seek to prevent concentrations of uses that would harm an area's attractiveness to shoppers or its residential amenity.
- 13.88** Assessments for noise and vibration from entertainment and leisure premises must include consideration of amplified and unamplified music, human voices, footfall and vehicle movements and general activity.
- 13.89** Generally, town centre uses and noise from leisure uses alter the noise environment through audio devices, amplified and unamplified music, footfall, congregations of people, plant and equipment, deliveries and transport and can be particularly evident when the background noise level is quieter. The Council expects the noise impacts of food, drink, and entertainment uses to be considered within an acoustic report. Further guidance is provided in Camden Planning Guidance on Amenity and Town Centres and Retail.
- 13.90** Where such uses are considered acceptable, the Council may impose planning conditions to control aspects such as (but not limited to) hours of operations, amplified music and restrictions on times where outdoor areas can be used.
- 13.91** The Council will also consider the use of management plans secured through a legal agreement, which may include elements principally seeking to manage noise off-site.

### **Plant and other noise generating equipment**

- 13.92** Planning conditions will be imposed to require that plant and equipment which may be a source of noise (including heat pumps) is kept working efficiently and within the required noise limits and time restrictions. Conditions may also be imposed to ensure that attenuation measures are kept in place and are effective throughout the life of the development, such as long-term maintenance agreements.

### **Retrofitting measures**

- 13.93** There will be circumstances where retrofitting measures are required to existing noise and/or vibration sources in order to mitigate their impact on the surrounding area, or to sensitive uses (including homes) to minimise exposure to noise and

vibration. The Council will support acoustic and vibration retrofitting measures where the applicant can demonstrate to the Council's satisfaction, that they will be effective in mitigating/reducing the impacts of noise or vibration. Proposals for retrofitting measures will be required to comply with wider relevant policies in the Plan, including design policies.

### **Delivery management**

- 13.94** To manage potential noise issues from deliveries, conditions may be applied to require deliveries, collections and the loading and unloading of goods and refuse take place within specific times.
- 13.95** Developments requiring deliveries outside of these times will be required to provide an acoustic report to demonstrate there will be no adverse impact on the acoustic environment with particular reference to residential occupiers as a result of these activities. This could be evidenced within the wider Delivery and Servicing Management Plan for the site. Regard should also be had to the Noise Abatement Society's silent approach quiet time delivery scheme and TfL's 'Retiming Deliveries' to mitigate the negative effects of possible out of hours deliveries.

### **Demolition and construction management**

- 13.96** Measures to mitigate the impacts of noise and vibration associated with demolition and construction will be secured by legal agreement through Construction Management Plans (see Policy A1 Protecting Amenity).

# Safe, Healthy and Sustainable Transport



# Chapter 14: Safe, Healthy and Sustainable Transport

- 14.1** Camden's transport network and streets play an essential role in connecting people to opportunities and essential goods and services both within and outside of the borough, including jobs, education, health care, shops, recreation, and leisure. Transport accessibility is also a major catalyst for unlocking sites allocated for development in the Local Plan.
- 14.2** We need to go further to radically change the way we move about, to ensure that travel becomes healthier, safer, more inclusive, more efficient, more sustainable, and more affordable. Achieving this will help to improve air quality, personal health, equality and community cohesion, access to opportunities and services, and economic growth. In addition to supporting the Council's commitment to being a net zero borough by 2030 by reducing transport's contribution to climate change, helping to tackle congestion on the transport network, and creating more inclusive streets that better meet the needs of Camden's communities.
- 14.3** The Camden Transport Strategy sets out the Council's ambitions for transport in the borough with the aim of transforming mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The policies in this chapter support the delivery of the Council's Transport Strategy by prioritising sustainable modes of transport such as walking, wheeling, cycling and public transport and seeking to minimise the use of motor vehicles to transport both people and freight, by only supporting it where there is essential need, and predominantly for low polluting motor vehicles.

## Policy T1 – Safe, Healthy and Sustainable Transport

- A.** The Council will prioritise the delivery of safe, active, healthy, affordable, and sustainable transport in line with the Council's Transport Strategy, Climate Action Plan, and Clean Air Action Plan to maximise health and well-being, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities. The Council will:
- i.** prioritise walking, wheeling, and cycling;
  - ii.** ensure that streets are designed to be attractive and safe; minimise opportunities for crime; and be inclusive and accessible for all, in line with the Mayor's Healthy Streets approach;
  - iii.** require development to contribute towards the delivery of highways greening measures, including tree planting, provision of pocket parks and green space, the introduction of rain gardens and other street greening measures;
  - iv.** reduce vehicle use through the delivery of car free development, provision of alternative, sustainable modes of travel, supporting improvements to and investment in public transport, and by prioritising the sustainable movement of goods, services, and materials;
  - v.** require development to reduce and mitigate the impact of transport-based emissions and noise in Camden;

- vi. not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects;
- vii. protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance;
- viii. require development to contribute towards the delivery of shared transport infrastructure and services in Camden in accordance with Policy T4 Shared Transport Infrastructure and Services;
- ix. require development to contribute to the delivery of an efficient, well-maintained highway network and kerb-side space that prioritises the sustainable movement of goods, services, materials, and people; and
- x. ensure that economic growth and regeneration is both supported by, and supports, a sustainable transport network.

**14.4** This policy supports the delivery of the Council's Transport Strategy and associated Action Plans, the Climate Action Plan and Clean Air Strategy and seeks to deliver London-wide transport initiatives including the Mayor's Healthy Streets approach. The policy aims to improve health and reduce health inequalities; promote highways greening through the introduction of more street trees; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, wheeling, cycling and public transport use; improve street safety, comfort, convenience, and amenity; and support these outcomes through sensitively designed servicing facilities.

**14.5** The Council has already delivered a number of successful Healthy Streets projects in the borough including the West End Project, which has transformed the public realm of key areas, including Alfred Place and Princes Circus, reduced congestion, and air pollution, helped speed up bus routes, made safer provisions for cyclists and provided safer, greener, and more attractive streets, with new and enhanced green spaces. Development coming forward in Camden will be expected to contribute to the delivery of Healthy Streets, in line with the priorities set out in the Council's Transport Strategy, Clean Air Action Plan and Climate Action Plan.

**14.6** Projects to provide new and improved transport infrastructure will play a central role in supporting development and promoting sustainable transport within the borough. As major development will largely be concentrated in locations that are, or will be, subject to significant transport improvements, land and facilities will therefore need to be safeguarded in order to ensure delivery of these projects. Furthermore, given the constraints on transport capacity in a densely developed borough like Camden, almost every part of existing transport infrastructure is a valuable asset. The Council will therefore seek to protect all existing and proposed transport facilities and links and safeguard the potential for improvements to the transport network.

**14.7** When determining applications for new development, the Council will consider the impacts of movements to, from and within a site, including links to existing transport networks, through transport assessments, travel plans, delivery and servicing management plans, and construction management plans. The use of these documents is covered within Policy A1 Managing the impact of development and further guidance is provided in Camden Planning Guidance on Transport.

## Prioritising Walking, Wheeling, and Cycling

- 14.8** To manage a very diverse and often conflicting demand for limited carriageway, footway and kerbside space, the Council currently adopts a road user hierarchy, which prioritises the most efficient, sustainable, and healthy modes of travel - walking, cycling and public transport. This approach is set out in the Council's Transport Strategy and is reflected in the approach taken in the Local Plan, which seeks to improve the conditions for pedestrians, cyclists (including disabled pedestrians and cyclists) and public transport users in Camden.
- 14.9** Enabling a greater proportion of journeys to be made by walking, wheeling, and cycling is an essential element of the Council's efforts to improve air quality, reduce transport's contribution to climate change, tackle congestion on the transport network, create more inclusive streets, and improve health and wellbeing of our residents and visitors. Development coming forward in Camden will therefore be required to prioritise the needs of pedestrians, cyclists and disabled pedestrians and cyclists in line with Policy T2 below.

### Policy T2 - Prioritising walking, wheeling, and cycling

- A.** The Council will promote active travel by prioritising walking, wheeling, and cycling in the borough, to improve health and wellbeing, reduce harmful emissions, improve air quality, help to tackle climate change, and deliver sustainable communities.

#### Walking and Wheeling

- B.** To promote walking and wheeling in the borough the Council will require development to:
- i.** contribute towards the delivery of high quality public realm improvement works, including pedestrianization and the provision of safe road crossings where needed, wider pavements where possible, seating, signage, and landscaping, including tree planting and the introduction of rain gardens and other street greening measures;
  - ii.** be easy and safe to move through ('permeable'), adequately lit and well connected to adjoining areas;
  - iii.** be designed to be inclusive and meet the needs of all pedestrians, in particular people with physical disabilities, people using wheelchairs and neurodiverse people;
  - iv.** provide high quality footpaths and pavements that are wide enough for the number of people expected to use them;
  - v.** avoid street clutter and ensure that street furniture, including phone boxes and advertisements, is located to allow the unobstructed movement of wheelchairs, mobility scooters and pushchairs;
  - vi.** contribute towards new bridges and bridge improvement works where appropriate (e.g., over railways and the Regents Canal); and
  - vii.** contribute towards other relevant infrastructure and "behaviour change" measures as set out in the Council's Walking and Accessibility Action Plan.



## Cycling

- C.** To promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will require development to:
- i.** provide for and make contributions towards high quality, connected, accessible, inclusive, convenient, and safe cycle routes, in line with or exceeding London Cycle Design Standards/national LTN 1/20 standards, including the implementation of improvements to strategic “primary” and “secondary” cycle routes in the borough;
  - ii.** provide for high quality, accessible, inclusive, convenient, and safe cycle parking facilities, exceeding the minimum standards outlined in the London Plan, and design requirements outlined within the Camden Planning Guidance on Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, considering the size and location of the development;
  - iii.** make provision for high quality, accessible, and inclusive facilities that promote cycle usage including changing rooms, showers, dryers and lockers;
  - iv.** make provision on-site for, or contribute off-site towards, improved cycle hire (and e-scooter hire) provision, including both “docked” and “dockless” systems in accordance with Policy T4 Shared Transport Infrastructure and Services;
  - v.** be easy and safe to cycle through (‘permeable’) and well connected to the wider cycle network. Contributions will be sought to deliver improvements to the wider cycle network in the vicinity of the development;
  - vi.** contribute towards bridges suitable for cycle use, where appropriate (e.g., over railways and the Regents Canal); and
  - vii.** contribute towards other relevant infrastructure and “behaviour change” measures as set out in the Council’s Cycling Action Plan

## Walking and Wheeling

- 14.10** The Council’s Transport Strategy and associated Walking and Accessibility Action Plan provide a framework for increasing walking and wheeling in Camden for all types of journeys. To deliver the Council’s aspirations a combination of infrastructure improvements will be required to create safer, more accessible and inclusive streets for all. Several infrastructure projects are set out in the Walking and Accessibility Action Plan and these will be updated on a 3-year cycle. The Council will seek to secure contributions towards the delivery of these projects using planning obligations, in line with Policy T2 above.
- 14.11** Further to this, Policy D1 Achieving Design Excellence and our Camden Planning Guidance documents on design and transport set out the Council’s approach to providing attractive streets and spaces. Public realm improvements will be delivered by the Council using our own funding, developer contributions, funding from Transport for London and other sources where available. The Council will continue to work with Transport for London and neighbouring London boroughs to deliver improved accessibility, connectivity and way finding within Camden and into neighbouring boroughs.

## Cycling

- 14.12** Cycling is a popular, healthy, and sustainable means of travel which we are strongly committed to encouraging further. The Council's Transport Strategy and associated Cycling Action Plan provide a framework for increasing cycling and promoting safer cycling in Camden. To deliver the Council's aspirations a combination of infrastructure improvements will be required to create safer, more accessible and inclusive cycle routes for all. A number of infrastructure projects are set out in the Cycling Action Plan and these will be updated on a 3-year cycle. The Council will seek to secure contributions towards the delivery of these projects using planning obligations, in line with Policy T2 above.
- 14.13** Furthermore, the Council will seek to ensure that developments contribute to and, where appropriate provide, appropriate links to strategic cycle routes. We will also expect cycle parking to be convenient, safe, and secure, so that users of a development are more likely to use bicycles to travel to and from a site. The Council will expect new cycle infrastructure to be inclusive and accessible to meet the needs of all cyclists, including disabled cyclists. Details regarding cycle parking standards and design requirements can be found within our Camden Planning Guidance on transport.

## Public Transport

- 14.14** Camden is extremely well served by public transport, particularly in the south of the borough, which has some of the highest Public Transport Accessibility Level (PTAL) ratings in the country. Areas with relatively lower levels of public transport provision continue to exist however, particularly in the north of the borough.
- 14.15** During peak commuting times, the borough's public transport network is operating at or near capacity despite recent upgrades to frequencies and stations, and only a small number of the borough's stations provide full step-free access.
- 14.16** The Area Strategies for the South, Centre, West and North of the borough, detailed in Policies S1, C1, W1 and N1, set out the transport infrastructure priorities for those areas and further priorities are set out in the Infrastructure Table in Appendix 1. Investment in public transport in Camden is required to support the delivery of the site allocations identified in this Plan, to sustain Camden's economy, to deliver the Council's ambitions around reducing car ownership and use and to deliver equality in access for Camden's residents. This is expected to be delivered in line with Policy T3 below.

## Policy T3 - Public Transport

- A.** To safeguard and promote the provision of public transport in the borough the Council will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage, and timetable information.
- B.** Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major

developments and the provision of improved public transport infrastructure including bus shelters and passenger information, and step free access at stations in the borough.

- C. Where appropriate, development will also be required to provide for interchange between different modes of transport, including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

- 14.17** In partnership with Transport for London, which manages the majority of the public transport network across London, the Council will ensure that Camden's growth is supported by improvements to public transport secured through planning obligations. Details regarding public transport contributions can be found within Camden Planning Guidance on developer contributions. Details regarding Transport Assessments can be found within Camden Planning Guidance on transport.
- 14.18** Most journeys involve changing between one form of travel and another and developments will sometimes need to cater for this. Passenger transport interchange facilities should provide for the coordination of arrival and departure timetabling on different services as far as possible. Interchanges should be designed to be accessible, safe and welcoming. Where interchanges cater for longer distance journeys, these should include toilets (including Changing Places toilets), baby changing facilities and facilities to provide refreshment for travellers.
- 14.19** Public transport should be accessible to all, however there are a number of rail and tube stations within Camden that do not offer step-free access. Step-free stations offer accessible routes from entrance to platform via lifts and/ or ramps without the need for stairs and/or escalators. Step-free projects are largely managed by Transport for London and/or rail network companies. The Council will however promote step-free access where possible and seek contributions from appropriate development schemes to deliver this, in addition to working with organisations seeking to implement step-free access at Camden stations.

## Shared transport infrastructure and services

- 14.20** The Council is working to promote the use of shared transport infrastructure and services in Camden to reduce private motor vehicle use and provide alternative modes of transport to the public transport network. The concept of shared transport is where travellers share a vehicle either simultaneously as a group (e.g., a car club) or over time as a personal rental (e.g., cycle/scooter hire). It is a demand driven, flexible way, of accessing transportation services, on an as-needed basis, and acts as a hybrid between private vehicle use, and use of public transport.
- 14.21** The Council is committed to providing a network of shared transport infrastructure and services across Camden. This includes the expansion and improvement of the Santander cycle hire docking station network, the e-bike and e-scooter hire bay network, the electric vehicle charging point network, and the car club bay network. The Council will also develop a network of micro mobility hubs and cargo bikes for hire.

## Policy T4 - Shared transport infrastructure and services

- A.** To support the delivery of shared transport infrastructure and services in Camden the Council will:
- i.** work with Transport for London to expand and improve the Santander cycle hire docking station network in the borough;
  - ii.** continue to expand the network of e-bike and e-scooter hire bays in the borough;
  - iii.** develop a network of cargo bikes for hire in the borough;
  - iv.** develop a network of micro mobility hubs in the borough;
  - v.** deliver a network of on-street electric vehicle charging points;
  - vi.** work with car club operators to expand and improve the network of car club bays in the borough, including the provision of electric car club vehicles where possible; and
  - vii.** seek contributions from developers towards the delivery of shared transport infrastructure and services in accordance with criteria A (i) to (vi) above.

**14.22** The Council has developed a methodology for assessing Shared Transport Accessibility Levels in Camden (STALC). This is similar to methodology for assessing Public Transport Accessibility Levels (PTAL). Shared transport options will be prioritised where public transport accessibility levels and STALC levels are low.

**14.23** There are more than 12,000 Santander bikes at around 800 docking stations across London and TfL has begun introducing e-bikes into their fleet. The Council is committed to working with TfL to expand the existing network to parts of the borough without any provision. Improvements to the network will assist in enabling more journeys to be undertaken by residents and visitors to the borough, contributing to the Cycling Action Plan and cycle mode share targets.

**14.24** There is a network of over 200 e-bike and e-scooter hire bays in the borough. These modes of transport are popular with our residents and visitors, including people who work or study in the borough. The Council is committed to expanding the network bays during the period of this plan to make it easier and more convenient for citizens to hire e-bikes and e-scooters. Expansion of the network will provide high quality alternative modes of transport to private motor vehicle use.

**14.25** The Council is committed to delivering a network of micro mobility hubs in the Borough, including where feasible Santander cycle hire docking stations, e-bike and e-scooter hire bays, cargo bikes for hire, and car club bays. The network of micro mobility hubs will provide high quality alternative modes of transport to private motor vehicle use.

**14.26** The borough currently has the largest car club network in London with over 200 car club parking bays. This provides a real alternative to private car ownership for people who need to use a car occasionally. Car clubs help people give up private car ownership by offering a vehicle when there is an essential need. It is estimated that each car club vehicle takes approximately 10 vehicles off the road, helping to reduce congestion and pollution as well as parking pressure. The Council is committed to working with car club operators to expand and improve the network of car club bays in the Borough, including the provision of electric car club vehicles where possible.

- 14.27** Our Electric Vehicle Charge Point (EVCP) Action Plan sets out the Council's plans to develop a comprehensive network of electric vehicle charge points that both responds to existing demand for EV infrastructure and provides for and accelerates the uptake of cleaner vehicles in the future. Contributions will be sought towards the expansion of our electric vehicle charging points network in the borough.

## Parking and car-free development

- 14.28** Camden is highly accessible and well connected, with residents in most areas of the borough able to access essential day to day services such as shops, healthcare, education facilities and employment opportunities, within 15 minutes of their homes – either by walking, wheeling, cycling, or by public transport, to help them live a fulfilling and healthy life in their local area.
- 14.29** Limiting the opportunities for parking within the borough can reduce car ownership and use and therefore lead to reductions in air pollution and congestion and improve the attractiveness of an area for local walking, wheeling and cycling. Car-free development will also mean that the borough's limited land can be used more efficiently, which will help to free up space to allow additional housing, employment uses, community facilities, play areas, amenity spaces and cycle parking. The Council does however also recognise that some people, businesses, and organisations, rely on private car use as their only transport option. Parking provision for disabled people and essential uses will therefore be considered where necessary.

## Policy T5 - Parking and car-free development

- A.** The Council will limit the availability of parking and require all new developments in the borough to be car-free, to reduce car ownership and vehicle use and encourage the use of alternative, sustainable modes of travel. The Council will:
- i.** not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
  - ii.** resist the provision of on-site car parking. On-site parking in new developments will be limited to:
    - a.** spaces designated for disabled people where necessary; and/or
    - b.** essential operational or servicing needs; and/or
    - c.** car club spaces;
  - iii.** require developments that provide or retain on-site parking to install electric vehicle (EV) charging points in accordance with the London Plan requirements. Electric vehicle charging points should be integrated into the design of the streetscape and should not obstruct pedestrian movement;
  - iv.** expect developments to make provision for the storage of mobility scooters where required;
  - v.** support the redevelopment of existing car parks for alternative uses;
  - vi.** reduce on-site parking, as far as possible, as part of re-development schemes;
  - vii.** require parking management plans to be submitted for developments, and redevelopments, that include the provision or retention of on-site parking; and
  - viii.** resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.

## **Car-free development**

- 14.30** Car-free development means that no car parking spaces are provided within the site other than those reserved for disabled people, car clubs, and businesses and services reliant upon parking, where this is integral to their nature, operational and/or servicing requirements (e.g., emergency services, storage and distribution uses). In addition, current and future occupiers are not issued with on-street parking permits. All new residential developments in the borough, including schemes where homes are created through a change of use, should be car-free. Parking will only be considered for new non-residential developments where it can be demonstrated that the parking provided is essential to the use or operation of the development. Staff parking is not considered essential and will not be permitted. Parking for disabled people for both residential and non-residential developments should be provided where it can be demonstrated as necessary, considering existing availability of on-street parking for Blue Badge holders.
- 14.31** Where on-site parking spaces are provided or retained, electric vehicle (EV) charging points should be provided in accordance with the London Plan requirements to support the development of a comprehensive network of EV charge points in the borough that both responds to existing demand for EV infrastructure and provides for and accelerates the uptake of cleaner vehicles in the future. Further information can be found within Camden Planning Guidance on Transport.

## **Redevelopments**

- 14.32** Land is an important resource, particularly within a densely developed and populated area such as Camden. The Council will therefore promote the development of parking space for alternative uses.
- 14.33** The Council will seek to reduce existing on-site parking provision as part of redevelopment schemes. The Council will only consider the retention or reprovision of existing parking provision where it can be demonstrated to its satisfaction that the existing occupiers are to return to the address when the development is completed. This is common where an existing dwelling or block is being extended or subdivided. If a development is to have new occupiers, this should be car-free. Any new development on an existing car park should be car free in accordance with Policy T5.

## **Boundary treatments and gardens**

- 14.34** Parking can cause damage to the environment. Trees, hedgerows, boundary walls and fences are often the traditional form of enclosure on Camden's streets, particularly in conservation areas, contributing greatly to their character, as recognised in Camden's Conservation Area Appraisals and Management Strategies. This form can be broken if garden features, including trees and hedgerows, are replaced by areas of paving or hard standing, the loss of which is also harmful to wildlife and biodiversity.
- 14.35** Development of boundary treatments and gardens to provide on-site private parking often requires the loss of much needed public on-street parking bays to

create vehicle crossovers. Areas of paving can also increase the volume and speed of water run-off. This adds to the pressure upon the drainage system and increases the risk of flooding from surface water. Developments seeking to replace garden areas and/or boundary treatments for the purposes of providing on-site parking will therefore be resisted.

## Sustainable movement of goods, services, and materials

- 14.36** The movement of goods, services, and materials (freight) is fundamental for Camden's economy and supporting day to day living. However, as this movement largely relies on Camden's road network, it can have a significant impact on the environment and the health and wellbeing of residents, in terms of noise disturbance and its contribution to road congestion, air pollution, climate change and road safety. A key aim of the Council is therefore to reduce the number of freight trips generated in Camden; shift freight trips to cleaner, more sustainable, and more efficient transport modes, for example cargo bikes; and encourage freight trips to be undertaken outside of peak hours in particular locations, to minimise the movement of goods, services, and materials by road.

### Policy T6 - Sustainable movement of goods, services, and materials

- A.** To promote the sustainable movement of goods, services and materials and minimise their movement by road, the Council will:
- i.** encourage the safe movement of goods, services and materials by bicycle, canal, and rail, where possible;
  - ii.** require major developments to make provision for cargo bike parking, where appropriate;
  - iii.** seek contributions towards the delivery of new and improved cycle routes and cargo bike parking from new logistics and freight consolidation developments that result in additional cargo bike movements;
  - iv.** protect existing facilities for waterborne and rail freight traffic;
  - v.** require developments to be designed to enable and encourage servicing using sustainable means, for example on foot, using zero emission vehicles or by cargo bike;
  - vi.** seek to minimise the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours and the adoption of area wide solutions;
  - vii.** promote the provision and use of freight consolidation facilities to ensure that last mile deliveries are undertaken by sustainable means;
  - viii.** encourage the use of underused spaces in the borough for micro mobility hubs, and urban logistics hubs; and
  - ix.** seek to ensure that parcel drop off hubs are incorporated into new developments, where appropriate.
- B.** Where developments are likely to generate significant movement of goods, services, or materials by road (both during construction and operation), applicants will be expected to:
- i.** minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads;
  - ii.** accommodate goods vehicles on site; and

iii. provide Construction Management Plans, Delivery and Servicing

### **Management Plans, and Transport Assessments.**

- C. Where the impact from a development cannot be mitigated to the Council's satisfaction, then the Council will expect the development to contribute towards off-site freight/servicing provision (for example, last-mile delivery hubs or cycle freight systems) and other measures, as appropriate.

#### **Cycle freight**

- 14.37** Over recent years, there has been a growth in the use of cycle freight in London, as a means of providing a sustainable freight and servicing solution. Cycle freight is an affordable, safe, clean, and efficient alternative to vans and other light goods vehicles and is particularly well suited to last mile deliveries.
- 14.38** The Council will promote the use of cycle freight, by expecting developers to make provision for cycle freight as part of Delivery and Servicing Management Plans. This provides the potential to manage deliveries in a way that is zero carbon, has little or no noise or air pollution implications and has a minimal impact on congestion.
- 14.39** The Council recognises however, that to support the continued growth in cycle freight, investment is required to provide cargo bike friendly infrastructure, including cycle lanes and cycle parking. The Council will therefore seek to ensure that developments contribute to and, where appropriate, provide appropriate cycling infrastructure to support cargo bike usage in Camden.
- 14.40** Where applications are received for cargo bike storage facilities at existing residential properties or commercial developments then these will be determined in accordance with the Council's design policies and other relevant policies in this Plan.
- 14.41** Further information is available within Camden Planning Guidance on Transport.

#### **Rail and water freight**

- 14.42** The Council recognises the problems that are caused by long distance movement of goods by road and the potential advantages of using rail and water as alternatives. The North London Line, the Gospel Oak to Barking Line and the West Coast Mainline are already used for significant volumes of rail freight. Rail freight is promoted as a real alternative to road as it contributes nearly 90% per tonne fewer emissions.
- 14.43** Regent's Canal is thought to be an economically viable route for some freight movements, notably the removal of demolition waste from canal-side sites. The Council will expect new developments along or close to the Canal to consider its use for the movement of goods and materials and to contribute to the improvement of the Canal towpath, where appropriate. The Canal is a Metropolitan Site of Importance for Nature Conservation (SINC) as it supports a range of aquatic flora, fish, invertebrates, waterfowl, and a variety of waterside plants grow on its brickwork and banks. Developments which generate freight movements via the



Canal may be required to provide evidence that operations will not cause excessive disturbance to habitats in line with Policy NE2 Biodiversity.

- 14.44** The Council will seek to protect track-side freight processing sites such as the existing aggregate handling facility at King's Cross. We will also seek to protect Canal-side freight facilities.

### **Servicing and deliveries**

- 14.45** Where possible, servicing and deliveries should take place within the curtilage of the development and developments should incorporate space within the site for goods vehicles. The space required for service vehicles is set out within our Camden Planning Guidance on Transport.
- 14.46** To minimise the impact of freight and servicing trips on local neighbourhoods and Camden's road network, deliveries and servicing should be timed to take place outside of peak travel hours and area wide solutions (for example the use of freight consolidation centres) should be sought. Applicants are recommended to discuss servicing and deliveries in the pre-application process, liaising with the Council's Highways team as appropriate. Development should show how servicing and deliveries have been considered in the design of the development in a Design and Access Statement and where required, a Servicing and Deliveries Management Plan.
- 14.47** Development should also demonstrate how deliveries and servicing to other sites will occur using sustainable or zero emission means. This could include details of vehicles, electric vehicle charging points and cargo bikes within a Servicing and Deliveries Management Plan.

### **Freight consolidation, urban logistics, and micro mobility hubs**

- 14.48** The Council will promote the use of freight consolidation centres, urban logistics, and micro mobility hubs within Delivery and Servicing Management Plans to ensure that last mile deliveries are undertaken by sustainable means. These spaces usually cover a defined geographic area and enable multiple suppliers to deliver to a single hub. At the hub goods are then grouped together so that fewer delivery journeys are required. This approach helps reduce congestion, air pollution and noise on Camden's roads. Further information regarding Delivery and Servicing Management Plans is available within our Camden Planning Guidance on Transport.
- 14.49** The Council will seek to secure contributions towards the provision of freight consolidation hubs and micro mobility hubs where such provision would result in reduced vehicle trips and impacts on the environment. Micro mobility hubs in Camden include parking bays for rental e-bikes and e-scooters. They also include dedicated parking provision for rental cargo e-bikes.

### **Moving goods and materials on appropriate roads**

- 14.50** The roads considered to be most suitable for use by lorries and other heavy goods vehicles are those in the Transport for London Road Network and others designated as Major Roads. Heavy goods vehicles should therefore be routed to

minimise the use of district and local roads for the movement of goods, particularly roads which provide primarily for access to residential properties.

### **Transport Assessments, Construction Management Plans, and Delivery and Servicing Management Plans**

- 14.51** For further information on the content and application of these documents please refer to Policy A1 Managing the impact of development and our Camden Planning Guidance documents on Transport, amenity, and developer contributions.

# Delivery and Monitoring



# Chapter 15: Delivery and Monitoring

- 15.1** This section provides an overview of the ways the Council will deliver the Local Plan's vision, objectives and policies, focussing on how we will:
- work with our partners to deliver our plans;
  - ensure necessary infrastructure is provided;
  - make use of planning obligations and the Community Infrastructure Levy (CIL);
  - monitor the delivery of the Local Plan.
- 15.2** A key mechanism for delivering the Local Plan will be the Council's decisions on planning applications. The policies and site allocations in the Local Plan, Area Action Plans, the North London Waste Plan and neighbourhood plans will provide the framework for these decisions. We will also take account of the Council's supplementary planning documents (including Camden Planning Guidance, planning briefs and frameworks and conservation area statements, appraisals and management strategies) when determining planning applications.

## Policy DM 1 - Delivery and monitoring

- A.** The Council will deliver the vision, objectives and policies of the Local Plan by:
- i. working with a range of partners to ensure that opportunities for delivering healthy and sustainable development that maximise community benefit are fully explored;
  - ii. working with relevant providers to ensure that necessary infrastructure is secured to support Camden's development and provide the facilities needed for the borough's communities. Information on key infrastructure programmes and projects in the borough up to 2041 are set out in Appendix 1;
  - iii. working proactively in its actions as a landowner and by facilitating land assembly where considered appropriate;
  - iv. using CIL, planning contributions and legal agreements where appropriate to:
    - a. support healthy and sustainable development;
    - b. secure the infrastructure, facilities and services to meet the needs generated by development;
    - c. mitigate the impact of development;
  - v. working with neighbouring boroughs to coordinate delivery across boundaries;
  - vi. securing appropriate scheme implementation (including multi-site developments) and controlling phasing where necessary;
  - vii. requiring applications that amend a consent to comply with all development plan policies, and, where appropriate, secure the delivery of additional requirements using planning obligations; and
  - viii. monitoring the implementation of the Local Plan policies and infrastructure provision on a regular basis.

### Ensuring necessary infrastructure is provided

- 15.3** It is vital that the transport facilities and services, utilities and social infrastructure needed in response to development and to support local communities are provided, particularly in the parts of the borough that will experience most growth in future years.

- 15.4** To support development in the borough, the Council will safeguard and improve essential social, physical and green infrastructure and work with service providers to ensure the timely delivery of the new and enhanced infrastructure needed to ensure that the quality of life of Camden's residents and workers is not harmed.

### **Infrastructure Study**

- 15.5** The Council updated the borough's Infrastructure Study in 2019. This shows the strategic items of infrastructure needed to support growth over the lifespan of the Local Plan. It reviewed relevant infrastructure providers' plans and strategies and was informed by consultation with infrastructure providers. A schedule of key infrastructure programmes and projects likely to be required to support the delivery of new homes, a successful economy and the creation of sustainable, healthy communities in the borough are listed by infrastructure type in Appendix 1. This is not an exhaustive list and other items will be required, as appropriate, in response to new development in the borough.

### **Delivery of Infrastructure**

- 15.6** Appendix 1 sets out the anticipated timing or phasing of infrastructure provision where this is known. This will depend on many factors, including when development takes place, the availability of funding, the timing of major investment, undertaking detailed feasibility studies, and in some cases planning consent for the infrastructure project itself.
- 15.7** Some of the items listed in Appendix 1 are already in the process of being delivered. In other cases, they have been identified in service provider strategies and business plans as likely to be required. These investment plans take into account forecast changes in population and household numbers to identify where future capacity issues may occur. There is more scope for certainty in the next 3-5 years than the longer term as major items of infrastructure have been programmed, costs and means of fundraising have been considered and the broad locations of development are well understood.
- 15.8** Where relevant, the individual sections in the Local Plan also contain details of required infrastructure and mechanisms for its delivery.

### **Working with developers and providers**

- 15.9** The Council will encourage dialogue between developers and service providers, including the services provided by the Council itself, to ensure that new infrastructure provision properly acknowledges the opportunities and constraints of the specific development site and its surroundings. For example, it will be important that developers take account of the opportunities to link their schemes with surrounding green infrastructure or consider what infrastructure such as water, wastewater, digital or utilities infrastructure need to be in place ahead of development.
- 15.10** Where necessary, development will be phased to ensure it comes forward at the same time as, or following the provision of, infrastructure. Development which is poorly programmed can lead to infrastructure problems and can negatively impact the local population.

## **Council's role in delivery**

- 15.11** Securing development in accordance with the Council's planning policies through the planning application process is the key mechanism for achieving many of the objectives of the Local Plan, together with appropriate enforcement of planning law.
- 15.12** The Site Allocation policies in the Plan also contain information about expected development and the specific infrastructure requirements of the sites and areas in the borough that are expected to experience significant development.

## **Council as landowner**

- 15.13** The Council as a landowner can promote and encourage specific development on its land, for example through the Community Investment Programme (CIP).
- 15.14** The Community Investment Programme (CIP) is the Council's plan to invest in schools, homes and community facilities in Camden, in response to Central government spending cuts. In September 2022 the Council committed to expanding the Programme and making an additional £1.3 billion investment. This additional investment will mean building a total of 4,850 new homes, including 1,800 council homes; and 350 Camden Living Rent homes for nurses, teachers, keyworkers and other middle-earners. The Council has also invested in 48 schools and children's centres and creating 9,000m<sup>2</sup> of improved community facilities. CIP will also help renovate thousands of existing council homes, as part of the Council's Better Homes Programme. CIP achieve this by building homes for sale which pay for these investments. More information about CIP can be found [here](#).
- 15.15** The Council may also look to promote or encourage uses on land adjacent to Council land by entering into partnership agreements.

## **Land assembly**

- 15.16** The Council can play a positive role in the implementation of the Plan by facilitating development through use of its land assembly powers, where considered appropriate. Land assembly can be a complex and time-consuming process. As a result, the Council will use its powers sparingly, concentrating on priority sites. Council involvement in land assembly is likely to be particularly important at locations where land ownership issues act as a constraint on development and on large sites that offer significant regeneration opportunities. The Council's preferred approach to land assembly will be through negotiation; therefore, use of formal land assembly powers will be a last resort. On sites where land assembly is required, the Council will work in partnership with developers and other relevant parties to achieve a mutually beneficial outcome.

## **Planning contributions**

- 15.17** New development proposals should be sufficiently supported by infrastructure. Both Camden and the Mayor of London make use of the Community Infrastructure Levy (CIL) to help fund infrastructure. The Council will also use planning obligations, in appropriate circumstances and in accordance with the National

Planning Policy Framework, to mitigate or compensate for the effects of new development.

- 15.18** The Council will use planning obligations, in appropriate circumstances and in accordance with the National Planning Policy Framework to mitigate or compensate for the potential effects of developments. This will be where existing and planned infrastructure provisions are not adequate to meet the needs generated by a development proposal.
- 15.19** Planning obligations (sometimes called Section 106 agreements) can help to contribute to the success of a development and achieving the Council's aims for a site, its local area and the borough as a whole. They can enhance the quality of a development and ensure it does not give rise to unacceptable planning impacts. A planning obligation will only be sought where it is not possible to deal with the matter through the imposition of a condition on a planning permission, it is considered necessary to make a development acceptable, and it is related to the development. In general terms, planning obligations will be used to fund more site-specific infrastructure than CIL.
- 15.20** The measures sought through a planning obligation will vary depending on the nature and scale of a development scheme, its location and impacts. The main matters that the Council considers are likely to be addressed through such agreements are:
- on-site provision of:
    - infrastructure to mitigate the direct impacts of development, such as landscaping, servicing and direct access (these may also be addressed through S278 agreements), particularly for major developments (where not CIL funded);
    - affordable housing; and
    - open space and its maintenance (particularly in larger schemes)
  - tackling climate change and environmental impacts;
  - training, skills and regeneration;
  - phasing of development; and
  - other obligations necessary to making a development acceptable.
- 15.21** This list is not exhaustive and development schemes can individually or cumulatively introduce a range of issues, requirements and impacts that may justify the use of planning obligations alongside the Camden Community Infrastructure Levy.
- 15.22** Planning obligations that reduce some negative impacts of a development or otherwise contribute to the Local Plan objectives will not in themselves justify accepting development that conflicts with planning policy.

### **Pooled contributions**

- 15.23** Pooled contributions will be used when the combined impact of development in an area creates the need for related infrastructure or works that will not be funded by CIL. Additional detail on the Council's approach to planning obligations is set out in the Council's Camden Planning Guidance on developer contributions.

## Community Infrastructure Levy (CIL)

- 15.24** The Community Infrastructure Levy (CIL) enables local authorities to raise funds for infrastructure to meet the needs arising from new developments. It is based on a formula relating to the type and size of development and is collected when planning permissions for new developments that exceed 100sqm or create additional dwellings are implemented. Negotiated planning obligations will still be possible for site specific issues and to allow for affordable housing to be delivered.
- 15.25** The Community Infrastructure Levy (CIL) enables local authorities to raise funds for infrastructure to meet the needs arising from new developments which exceed 100sqm or add a dwelling. It is based on a formula relating to the type and size of development and is collected when planning permissions for new developments are implemented. Negotiated planning obligations will still be possible for site specific issues and to allow for affordable housing to be delivered.
- 15.26** There are CIL rates for different uses and different parts of Camden which are set out in our Community Infrastructure Levy Charging Schedule. The funds raised can be spent on infrastructure such as community facilities, schools, open spaces, health projects and transport infrastructure. Spending is set out in an annual Section 106 and CIL report. What is to be funded may change over time and is set out in the Camden Infrastructure Funding Statement (IFS), which is also updated annually.

### Local element of CIL

- 15.27** A meaningful proportion of CIL funding should be spent in the neighbourhood where development arises. Camden has decided to spend 25% of the funding in the relevant local ward, with ward Councillors having a lead role in establishing priorities for and applying to use local CIL monies, in consultation with local communities and neighbourhood forums where these exist. Funds are spent to support the development of the local area by funding:
- a. the provision, improvement, replacement, operation or maintenance of infrastructure; or
  - b. anything else that is concerned with addressing the demands that development places on an area.
- 15.28** Neighbourhood forums should establish infrastructure priorities (providing detailed projects where possible) in their neighbourhood plan. Where a Neighbourhood Plan has been approved at referendum the priorities contained in the plan that are applicable to the ward should be carried across into the local priorities unless there is a clear reason for doing otherwise agreed by the Cabinet Member.
- 15.29** Additional detail on the Council's approach to CIL is set out in our Camden Planning Guidance on developer contributions and the Infrastructure Funding Statement (IFS).

### Mayor's CIL

- 15.30** The Mayor of London also charges a community infrastructure levy, which is used to fund strategic transport projects. The Mayoral CIL is collected by Camden and



other boroughs and passed to Transport for London. It is charged across the whole of the borough with higher rates applying to the development of offices, retail and hotels in the Central Activities Zone.

## **Working with partners**

- 15.31** Central to the delivery of the Local Plan will be working with our partners and developing new solutions to deliver the Council's Corporate Strategy. During the preparation of this Local Plan the Council has worked with key delivery partners to ensure the strategy and policies also reflect their aspirations, plans and spending programmes where appropriate.
- 15.32** Camden has a range of distinctive neighbourhoods that are integral to its character which the Local Plan seeks to protect and enhance. Our visions and objectives for areas such as Euston and Fitzrovia are set out in Area Action Plans, which have been developed in conjunction with our partners and the communities and business stakeholders.
- 15.33** Partners we will work with include:
- Neighbourhood forums, whom the Council will support and advise on developing neighbourhood plans to provide additional locally specific policy. Once neighbourhood plans are approved, they form part of the statutory Development Plan and are used alongside other Council adopted planning documents when making decisions on planning applications in the neighbourhood area. Please see our website for more information on the areas in Camden where neighbourhood planning is taking place.
  - Central London Partners, such as Central London boroughs and Central London Forward, for matters concerning London's Central Activity Zone (CAZ).
  - Business partners
  - Local community groups, residents and businesses. The Council's Statement of Community Involvement sets out how we involve the local community and other stakeholders in the preparation and implementation of our planning policy documents and in the consideration of planning applications.
  - Neighbouring boroughs.

## **Viability**

- 15.34** Planning obligations can take different forms and can involve the provision of certain requirements 'in kind' or financial contributions. In considering planning obligations, the Council will consider economic viability, the full range of benefits provided by a development, the extent to which it contributes towards delivering the objectives of this Local Plan and other planning policies and whether a development is publicly funded.
- 15.35** Where during the negotiation of a proposed scheme, it is argued that the Council's request for contributions would render development unviable, we will expect developers to provide information on viability through an open-book approach. The Council supports transparency in decision making and will seek the maximum reasonable disclosure of information in viability appraisals having regard to any elements that are commercially sensitive. However, because the provision of certain infrastructure is necessary to make development acceptable in planning terms, there will be instances where reducing contributions on viability grounds

would make development unacceptable, either because development cannot come forward without it in physical or safety terms or because it is necessary to mitigate the impacts of growth.

### **Flexible implementation of the Local Plan**

- 15.36** The Local Plan needs to be flexible enough to ensure that the Council's vision and objectives for Camden can be delivered in future years despite changing circumstances. This is particularly important with regards to delivering our approach to Camden's growth and meeting the borough's needs for homes, jobs, services and infrastructure.
- 15.37** here is a need for sensitive and flexible implementation. However, while our plans must be suitably flexible, it is vital that the level of flexibility does not create uncertainty or harm the overall delivery of the Local Plan. This Local Plan has therefore been prepared to be flexible enough to cope with a changing world, while ensuring our vision and objectives for the borough are delivered.
- 15.38** Sometimes the Local Plan's implementation will rely upon appropriate alternative or amended approaches to deal with emerging issues and changing circumstances. Individual policies in this Local Plan include an element of flexibility where appropriate, in particular in relation to the consideration of the viability of development schemes, the feasibility of particular measures and site-specific issues.

### **Amendments to existing consents**

- 15.39** Where an application to vary an existing planning consent is submitted, the Council will consider all development plan policies and any requirements arising from the scheme overall (as amended). Where these requirements are greater than those from the original permission, the Council will seek a planning obligation to secure the delivery of the additional requirements. Where requirements have increased since the original permission, the Council will apply the increased requirements to any additional floorspace arising from the s73 application only.

### **Monitoring**

- 15.40** The Council will monitor the effectiveness of the Local Plan in delivering its objectives by regularly assessing its performance against a series of indicators. This will be reported annually in the Council's Authority Monitoring Report, which is available to view online Planning Policy - Monitoring, Data and Evidence - Camden Council
- 15.41** Regular monitoring will measure progress in delivering the Local Plan and identify any aspects that are not being achieved as planned and any changing circumstances that may affect implementation. This will allow us to adjust the application of policies where appropriate and, if necessary, bring forward alternative approaches or policies.

# Appendices



# Appendix 1: Infrastructure schedule

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
<b>CHILDREN AND EDUCATION SERVICES</b>						
1	Early years support	A new Camden family hubs network was established in 2023 (involving the transformation of 5 existing children's centres).	Borough wide	LB Camden	2023 onwards	The hubs offer a 'one stop shop' of family support services covering social care, education, mental health, and physical healthcare needs. Services are available through pregnancy and a child's early years extending up to the age of 19 or 25 for young people with special education needs or disabilities.
2	Early years funded childcare	<p>2 year olds- the Council offers eligible 2 year olds free early education and childcare places for up to 15 hours per week during term time.</p> <p>3 and 4 year olds- all Camden children are entitled to early education and childcare for 15 hours per week during term time from the term after the 3rd birthday.</p> <p>Eligible Camden families are able to access a further 15 hours of early education and childcare from a Government-led scheme. A Camden Enhanced scheme operates for families that are not eligible for the Government scheme,</p>	Borough wide	LB Camden	Ongoing	There are a variety of childcare providers in the Borough including nurseries, pre-schools, and childminders. Details of these services are available on the Council's website: <a href="#">Find childcare - Camden Council</a>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
3	Primary school provision	<p>Annual School Places planning and monitoring: this involves yearly forecasting of future requirements for places, taking into account housing development.</p> <p>High surplus capacity is expected in Camden primary schools until at least 2031/32.</p>	<p>Borough wide</p> <p>There are 39 primary schools in Camden</p>	LB Camden	Up to 2031/32	<p>The Council has a statutory duty to ensure there is the right number of school places. In common with other inner London boroughs, Camden is experiencing a sustained fall in registered births and fertility rates and there are less families moving into the Borough.</p> <p>Information has been taken from the Council's 2022 School Place Planning Report published in November 2022.</p> <p>Since 2018, there have been four primary school closures with 10 forms of entry (1 FE is equivalent to 30 school places) removed at reception level.</p>
4	Secondary school provision	As above, significant surplus capacity is also expected in secondary schools over the period.	<p>Borough wide</p> <p>There are 10 secondary schools in Camden</p>	LB Camden	As above	As above
5	Post 16 education	<p>The largest FE college in Camden is Westminster Kingsway which operates from two sites in Camden.</p> <p>The Alexandra Centre is for 16-25 year olds with profound and multiple learning difficulties or severe learning difficulties.</p> <p>Leighton College is for 16-25 year olds with mild to moderate learning difficulties and disabilities.</p>	Various	Westminster Kingsway, LB Camden, Elfrida Rathbone	Ongoing	

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
6	Children and young people with Special Educational Needs and Disabilities (SEND)	<p>The Council has adopted a Local Area SEND Strategy for 2022-2027 aimed at improving outcomes for children and young people up to 25 years old with SEND.</p> <p>Camden is responsible for around 4,500 children and young people with SEND with around 14% of those attending Camden schools receiving SEND support.</p> <p>There are around 1,400 children and young people resident in Camden with Education, Health and Care Plans (ECHPs) who receive additional support.</p> <p>The Council also funds health support and therapeutics in health and education settings and children's homes. This includes Speech and Language Therapy, Occupational Therapy, Physiotherapy, Mental Health services and multi-disciplinary care for disabled children with the most complex needs and their families.</p>	Borough wide	LB Camden	2022-2027	<p>The most common areas of primary need in Camden are support with autism; social emotional and mental health (SEMH) and speech, language, and communication (SLC).</p> <p>The Council projects the number of children living in Camden who require SEN support is likely to rise by an average of 2% per year. This means further specialist places are likely to be required. The SEND strategy targets an increase in Additionally Resourced Provision (ARP) places within mainstream schools – up to 120 places, the majority of which are for autistic children and young people.</p> <p>Camden's Local SEND offer can be found here: <a href="#">The Local Offer - Camden Council</a></p> <p>Most children and young people in Camden with SEND are educated in mainstream schools and early years settings and around half of children and young people with ECHPs.</p> <p>There are 3 maintained special schools offering 330 places, the largest provider is Swiss Cottage special school which specialises in supporting children with profound and multiple learning difficulties. The Camden Centre for Learning is a secondary specialist provider for young people with social, emotional and mental health needs (SEMH) offering a bespoke and personalised curriculum.</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
7	Adult community learning	The Council's adult community learning service provides education and training courses for adults to gain new skills in health and wellbeing, digital inclusion, family learning, English for Speakers of Other Languages and a range of vocational courses supporting adults into work.	Borough wide	LB Camden	Ongoing	Details of Camden Council's offer can be found here: <a href="#">Camden Adult Community Learning - Camden Council</a>
	<b>HEALTHCARE SERVICES</b>					
8	Integrated health and care hubs	<p>Integrated Neighbourhood Teams (INT): co-location of multi-agency teams</p> <p>These integrated teams are being developed which co-locate frontline staff including GP staff and wider primary care professionals.</p>	Borough wide	NHS / North Central London Integrated Care system	From 2024	<p>A greater emphasis is being placed on joined-up health and care provision.</p> <p>All Camden practices are members of one of eight 'Primary Care Networks' (PCNs). Practices within each PCN are working together to deliver nationally mandated 'additional services' such as social prescribing, medical reviews, early cancer diagnosis, cardiovascular disease prevention and diagnosis, anticipatory care and personalised care. These additional services are provided by existing GP staff as well as new staff such as pharmacists, physician associates and physiotherapists.</p> <p>There are challenges accommodating these additional activities and staff across the estate due to the size and layout of individual surgeries, which the hub model will seek to address.</p> <p>It is expected the East INT will be in place in 2024 with others following.</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
<b>HEALTHCARE SERVICES</b>						
9	North Camden Primary Health Care Hub	A new GP hub facility providing Primary Care at scale and incorporating Hampstead Group Practice	North of the Borough	NHS	Mid Plan period	
10	New Gospel Oak Health Centre	Provision of a modern health hub (replacing existing provision at Wendling estate, Lismore Circus)	Gospel Oak	NHS (CNWL/	Linked to delivery of the Wendling CIP scheme	
11	Parliament Hill Surgery	Potential need for additional clinical capacity linked to future housing growth at Kentish Town/ Gospel Oak	Kentish Town	NHS	By mid plan period	
12	Royal Free Hospital Masterplan	This includes an endoscopy suite rebuild and hybrid theatre expansion	Royal Free Hospital site	NHS	Plan period	
13	Euston: Crowndale and Regent's Park practices	Additional capacity to respond to population growth, linked to proposals for Euston station / HS2	Euston area	NHS	Mid to late plan period	
14	Kentish Town Health Centre / NW5 Hub Integrated	Internal refurbishment and alterations to increase utilisation and house Integrated Neighbourhood Teams	Kentish Town	NHS	2024	This would create an integrated health and care hub for the East of the Borough.



Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
15	Greenland Road, Camden Town	Provision of a new C&I community mental health hub	Camden Town	NHS (C&I Trust)	Mid Plan period	
16	St Pancras Hospital redevelopment	Relocation of intermediate beds from South Wing	St Pancras Hospital site	CNWL	By 2026	
17	Tavistock Centre, Belsize Lane	Relocation to a new facility	Location tbc	Tavistock and Portman NHS Trust	Mid to late Plan period	
18	Solent Road Health Centre, West Hampstead	Refurbishment and further extension	West Hampstead	NHS	Mid Plan period	To be in place before main housing phases of 02 Centre are occupied.
19	New 'West' health hub (C&I community hub plus primary care)	This would provide a new Integrated Neighbourhood Team Hub for the West of the Borough and help meet the needs arising from population growth in the area.	West Hampstead/ Finchley Road	NHS	Mid Plan period	Provision is being made through the Section 106 agreement for the 02 Centre and car park site.
20	Brondesbury Medical Centre, Kilburn	Potential need for additional clinical capacity linked to population growth	Kilburn	NHS	2025	

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
21	St Pancras Hospital	Provision of a new Community mental health centre and relocation of Royal Free renal services, diabetes services and ophthalmology from North Wing	St Pancras Hospital site	NHS	Linked to the delivery of later phases of	
22	Museum Street GP practice	There is limited scope to expand/reconfigure in current premises. Options to expand or relocate the practice are being assessed.	South of the Borough	NHS	Early to mid Plan period	
23	Hunter Street Health Centre / Integrated	Greater utilisation of premises, relocation of GP practice/provision of primary care at scale and optimisation of community services	Hunter Street	NHS	Mid plan period	
24	Gray's Inn Road Medical Centre	Additional clinical capacity has been identified as a priority to service the patient list	Gray's Inn Road area	NHS	To be confirmed	
25	Ridgmount surgery	Additional clinical capacity has been identified as a priority to service the patient list	Ridgmount Street	NHS	To be confirmed	

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
<b>ADULT SOCIAL CARE</b>						
26	Integrated	The Council's Adult Social Care (ASC) service has been working with the NHS and partners to develop and implement 'integrated services' – joining up all services and organisations providing support at a neighbourhood level, including ASC, mental health, community nursing, social prescribing and GP practices. See also health entry above.	Borough wide	LB Camden ASC, NHS trusts and partners	2024 onwards	Staff will be deployed to support the integrated model from Camden ASC, Camden and Islington (C&I) NHS Trust, Central and North West London (CNWL) NHS Trust and primary care.  The priority is to get an East INT in place in 2024 with others following.

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
27	ASC Accommodation Plan	<p>Projections for Camden’s population indicate that by 2035:</p> <ul style="list-style-type: none"> <li>• There will be an increased number of residents who need to draw on care and support, particularly over 65s.</li> <li>• A need to increase the amount of supported living and residential places for residents who have a learning difficulty, as well as a rise in supported living, homecare and residential care for residents experiencing mental ill health</li> <li>• There will be a need to provide more choice and options to support young people moving from Children’s Services to ASC, neurodiverse residents, people with mental ill health and people in adult homeless hostels</li> </ul>	Borough wide	LC Camden ASC, NHS trusts and partners	To 2035	The Accommodation Plan is based on enabling people to stay in their own home as long as possible through person-centred care and greater use of technology with the aims of increasing independence and reducing loneliness.

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
<b>LEISURE AND COMMUNITY FACILITIES</b>						
28	Sports provision	Sports provision is likely to be met through extension of opening hours and optimising the use of existing facilities (including shared-use agreements) and delivering a more diverse and inclusive sports provision.	Borough wide taking account of existing provision	Private developer/ Schools through dual-use agreements	Plan period	<p>The Open Space, Sport, and Recreation Study 2014 identified the need for additional sports halls. At least a further 3 multi-purpose sports halls are estimated to be needed to meet demand. The Study identified the need for an additional 4 tennis courts to meet demand. Although demand for swimming is sufficiently met, there is deficiency in access to swimming pools (i.e. many are membership-only).</p> <p>There are no known new sports hall, health and fitness centres or swimming pool developments planned within the London Borough of Camden.</p> <p>There is potential for the Community Infrastructure Levy to be used to refurbish and maintain existing sports facilities and shared-use agreements to be secured through legal agreements/ planning conditions in the development management process.</p> <p>The Council will seek to leverage existing community assets and infrastructure such as schools, tenants and citizens association halls, and parks and open spaces in combination with well-trained staff to deliver doorstep services. These can target those who cannot or do not feel comfortable attending leisure centres. A more diverse and inclusive provision can tailor physical activity to community needs, reach those who need it most, and make physical activity local, social, simple, and well-timed. It will ensure the physical activity service is sustainable and consistent.</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
29	Provision of new public open space and enhancement of existing spaces and their facilities	New public open space will be secured through development schemes, with priority given to deficiency areas.	Borough wide taking account of deficiency areas	Private developers/ LB Camden Parks and Open Spaces working with landowners, land managers and community management	Plan period	<p>This will be delivered through the implementation of Draft Local Plan Policy SC3.</p> <p>Developers to address site-specific need and mitigate impact on existing provision through Section 106 agreements. CIL will potentially fund some strategic park improvement projects which are not directly related to individual development proposals.</p> <p>Camden and Islington's Parks for Health Strategy 2022-2030 sets out the Boroughs' shared learning and how they will take forward our recognition of how integral parks are for a healthy community – linking with Camden's Health and Wellbeing strategy and the Integrated Care Partnership for the borough. The Council's Green Space service contract is currently undergoing the recommissioning process to explore what future service delivery will look like and ensure it meets future demands.</p> <p>The Council's Green Space Investment Programme has continued to improve and enhance green spaces across the borough. The Council are exploring how they can adapt our parks to make them more climate resilient and have completed a new masterplan for Kilburn Grange Park. Several projects are also under way to improve spaces on housing estates. The West End Project has continued the creation of new green spaces in the heart of Central London.</p> <p>HS2 open space mitigation projects have been completed around Euston. In response to the pause to HS2 construction, the Council have been identifying opportunities for additional meanwhile space using mothballed construction areas.</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
30	Improving access to nature through Biodiversity enhancing measures in new development	Biodiversity gains are achieved through the provision of new natural green spaces in major developments and enhancement measures delivered through schemes including, green roofs, wildlife corridors, and biodiversity enhancing landscaping. The council is also working with partners to develop the biodiversity value of parks and use of nature sites as an educational resource.	Borough wide taking account of deficiency areas	Private developers/ LB Camden parks and open spaces	Plan period	Biodiversity enhancements will be delivered through the application of Draft Local Plan Policies NE1 and NE2, which seek to deliver the objectives of the Council's adopted Biodiversity Strategy: <a href="https://www.camden.gov.uk/wildlife-areas#cjmw">https://www.camden.gov.uk/wildlife-areas#cjmw</a>
31		New and refurbished play space for children and young people.	Borough wide taking account of deficiency areas	Private developers / LB Camden Parks and Open Space	Plan period	<p>Developers to address site-specific need and mitigate impact on existing provision through Section 106 agreements. Some strategic play space improvements may potentially be delivered through CIL funding.</p> <p>The Council continues to invest in renewing and renovating play areas and inspecting them regularly to ensure they remain safe and open for use.</p> <p>The Open Space Study shows all wards in the Borough have areas outside of the catchment area for formal children's play facilities.</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
32	Establishment of new allotments and food growing	<p>The Council will support food growing and community food growing in Camden to ensure that residents have access to nutritious, affordable, and sustainable food.</p> <p>Expansion of opportunities for food growing including incorporation of allotments and community gardens in major developments, planting of food growing strips, roof gardens, re-use of open space (e.g. housing estate amenity space) and temporary use of vacant or derelict land and buildings</p>	Borough wide taking account of deficiency areas	LB Camden Parks and Open Spaces/ allotment	Plan period	<p>This will be delivered through the application of Draft Local Plan Policy SC4, which sets out the Council's strategy for securing space for food growing from new development. This may be secured through condition or Section 106 agreements.</p> <p>Details of Camden Council's food growing and allotment offer can be found here:</p> <p><a href="https://www.camden.gov.uk/volunteering-food-growing-and-allotments">https://www.camden.gov.uk/volunteering-food-growing-and-allotments</a></p> <p><a href="https://www.camden.gov.uk/documents/20142/15817034/CD2.5+Open+Space+Sport+Recreation+Study+2014.pdf/4ce694bd-f292-b73f-d061-d0150ea3eb5a">https://www.camden.gov.uk/documents/20142/15817034/CD2.5+Open+Space+Sport+Recreation+Study+2014.pdf/4ce694bd-f292-b73f-d061-d0150ea3eb5a</a></p>
33	Street trees programme	<p>The Council will seek to protect existing trees and secure additional tree planting in the borough.</p> <p>Planting of additional street trees to ensure at least 800 new trees are planted. New developments and public realm schemes to include trees in their design wherever possible.</p>	Borough wide	LB Camden Trees team and Highways Transport for London	Plan period	<p>This will be delivered through the application of Draft Local Plan Policy NE3.</p> <p>The Council will ensure new trees are considered as part of new developments in the design process, including use of Section 106 agreements.</p> <p>Potential funding through CIL for street trees as part of public realm works in the future.</p> <p>Funding support will be sought from the Mayor of London /TfL in appropriate cases.</p>



Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
34	Libraries	Future of Camden Libraries A Strategic Framework for 2016-25	Borough wide	LB Camden Culture and Leisure	2016 Onwards	<p>The Public Libraries Strategic Framework aims to refocus resources to those areas that will have the biggest impact on residents' lives and help meet the key outcomes in the Council's Corporate Strategy. The framework proposes four key areas of priority: reading and learning; digital inclusion and access; customer resilience and self-service; and community Hubs.</p> <p>Potential use of S106 funding to address site specific need and impact on existing provision. Projects include:</p> <ul style="list-style-type: none"> <li>• Improvements to Kilburn library;</li> <li>• Enhancement of Holborn archive provision;</li> <li>• Refurbishment of children's library at Swiss Cottage.</li> </ul>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
35	Community Centres and VCS Space	Upgrading of community centres	Borough wide	LB Camden	Ongoing	<p>Potential use of S106 funding to address site-specific need and impact on existing provision, particularly on large sites. Projects being implemented include:</p> <ul style="list-style-type: none"> <li>• Repair and improvements to Highgate New town Community Centre offering a flexible space that can host a wide variety of sessions and activities, available for hire by the local community and suitable for all ages.</li> </ul> <p>Where new community spaces are secured, the allocation (occupation) of the space should be determined with involvement from Council's Community Partnerships team and any such space needs to be affordable in terms of rent, charges, running costs and maintenance, and fitted out appropriately.</p> <p>The Council is also increasingly required to help upgrade and refurbishment premises used by VCS organisations, having regard to building surveys. These improvements can potentially be funded through contributions from CIL (as this provides flexibility for funding to support the general needs arising from development in the Borough).</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
<b>STRATEGIC TRANSPORT</b>						
36	High Speed Two (HS2)	New railway linking London Euston and Birmingham.	Cross borough	Department for Transport/ HS2 Ltd.	Opening of HS2 at Euston is not currently expected before the late 2030's	The Secretary of State for Transport has issued 'safeguarding directions' for the HS2 rail line. Construction started in 2017 but a two-year project pause was called by the government on the Euston part of the line was announced in Spring 2023 to enable a new design of Euston Station to be agreed (although certain essential works are continuing). Further government announcements were made in Autumn 2023 that will review funding and delivery arrangements for the Euston section of HS2.
37	Potential	Comprehensive redevelopment of Euston railway station  Euston railway station – potentially a component of High Speed 2.	Euston area	HS2/ Network Rail / Transport for London	Late 2030's	The Euston Area Plan is intended to help shape change in the area around Euston station up to 2031 it was prepared jointly by Camden Council the Greater London Authority and Transport for London. Euston is identified as the growth area for significant development in this plan regardless of whether HS2 goes ahead.
38	Cross Rail 2	Planned to relieve mainline rail terminals and crowding on London Underground lines. It would link south west and north east London. Stations being proposed in the Borough are at Tottenham Court Road (to link with Crossrail 1) and off Euston Road.	Cross borough	Transport for London and Department for Transport.	Late 2030's	Updated 'safeguarding directions' for Crossrail 2 were issued by the Secretary of State for Transport in March 2015.  The estimated cost is £12-20bn at 2012 prices.

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
39	Piccadilly line improvement	Renewal of signalling an introduction of a new fleet of trains	Cross borough	Transport for London	Plan period	The Piccadilly line runs from Heathrow to Cockfosters. There are stations in Camden at Holborn, Kings Cross, and Russell square.
40	Bus service enhancement	Bus service enhancements were required to mitigate the impacts of growth		Transport for London	Plan period	Enhancements to the frequency capacity and routine of bus services to mitigate the impacts of growth funded by developer contributions to support the impacts of larger developments.
41	Capacity upgrade of Camden Town Underground Station	Station upgrade to increase capacity and provide step free access from street to platforms	Camden Town	Transport for London	Paused	Subject to funding
42	Capacity upgrade of Holborn Underground Station	Station upgrade to increase capacity and provide step-free access from street to platforms.	West Hampstead	Transport for London	2026	One of 10 stations on transport for London's priority list and will be assessed to understand the scope and work involved in the best way to deliver step free upgrades including costs benefits funding opportunities and impact on customers
43	Step-free access – Kentish Town and Camden Town and West Hampstead	Delivering enhanced provision of step-free access to stations in West Hampstead, Camden, and Kentish Town station. Step-free access stations have lifts or ramps (or a combination of both) – so that customers don't have to use escalators or stairs to move between the street and platform.	At specified stations	Transport for London	Plan period	<p>As part of the redevelopment of the 02 centre the Council has secured funding towards providing step-free access from the ticket hall down to the platforms at West Hampstead London Underground (Jubilee line) station and access from the development to Finchley Road London Underground (Jubilee line) station is safeguarded.</p> <p>However, there are a number of stations where step-free access is still not committed including Kentish Town National Rail station, Kentish Town Underground station and Kentish Town West Overground station.</p> <p>The responsibility for making stations and platforms fully accessible lies with the railway industry (Network Rail, Train Operating Companies and/or TfL depending on the station).</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
44	Step-free access - new stations	Provision of high quality step-free access to all new major transport infrastructure in the Borough, including existing commitments to HS2 stations.	At all new stations	HS2/ Transport for London	Plan period	As above
45	King's Cross Gyratory Scheme	Transport for London led project to improve safety for road users, particularly pedestrians and cyclists, and to reduce the impact of traffic at junctions on the Transport for London Road Network in the King's Cross Area, including corridor improvements on Grays Inn Road between Swinton Street and York Way.	King's Cross	Transport for London	Plan period (delivery to be brought forward in phases)	The King's Cross project is focussed on a number of 'A' roads in the King's Cross area within the London Boroughs of Camden and Islington, including Euston Road, Grays Inn Road, and Pentonville Road. Transport for London, working with LB Camden and LB Islington, will develop designs for improvements along Grays Inn Road, between York Way and Swinton Street, and at the following junctions: (1) Euston Road / Grays Inn Road / York Way, (2) King's Cross Bridge / Grays Inn Road, and (3) Euston Road / Pancras Road Belgrave Road. These improvements will be brought forward in separate phases and public consultations will be carried out on any proposed changes.

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
46	Camden High Street (North) Scheme	Substantially enhancing the pedestrian environment including a trial traffic-free scheme for Camden High Street north of the tube station, and providing high quality cycle links through the area (such as between the West End and Camden/ Tottenham Hale route), including and as part of an area-wide 'Liveable Neighbourhood' and/ or 'Low Emission Neighbourhood' scheme	Camden Town	LB Camden with partners	Plan period	The Council maintains a rolling three year programme of investment with an annual financial allocation made by TfL to support delivery. Area based schemes are funded through a block grant from Transport for London (part of the Corridors, Neighbourhoods and Supporting Measures programme). Supplemented by funding from developer contributions and funding from LB Camden. Works closely related to development on particular sites will be sought through s106 but other works will be funded through CIL.

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
47	Holborn Liveable	Transformation of Holborn and surrounding area through an extensive "Liveable Neighbourhood" scheme, with new areas of public realm, significant road safety improvements for pedestrians and cyclists, and measures to protect bus journey times. Removal of the road traffic gyratory from High Holborn, Bloomsbury Way and Procter Street, making it easier to cross the road. Improve the public realm by planting trees at numerous locations. Improve pedestrian and cycling facilities. Traffic reduction measures to address the high number of road collisions. Introduction of protected cycle lanes along Theobalds Road. Pedestrianise Great Russell Street which will dramatically improve the setting for the British Museum, and a pedestrian focused around Holborn station will dramatically improve the setting for the British Museum, and a pedestrian focused environment around Holborn station will improve the locations safety.	Holborn	LB Camden with partners	Plan period	As above. Schemes to be delivered will encourage walking, cycling and the use of public transport. In addition, A scheme to reduce and consolidate freight and servicing will be delivered in partnership with the local Business Improvement District, CDA.

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
48	Kilburn High Road Corridor Scheme	Delivering a transformational, 'Safe and Healthy Streets' scheme for the Kilburn High Road corridor and hinterland area with LB Brent. The scheme will upgrade the public realm to enable more walking and cycling, improve bus reliability and road safety.	Kilburn High Road area	LB Camden with partners including LB Brent	2025	As above
49	Regents Park Safe and Healthy Streets Scheme	Focused set of road safety and Healthy Streets interventions to address traffic issues and enable more walking and cycling.	Regents Park Area	LB Camden	Plan period	As above
50	Somers Town Future	Focused set of road safety and Healthy Streets interventions to address traffic issues and enable more walking and cycling	Somers Town	LB Camden	Plan period	As above
51	Area Safe and Healthy Streets Schemes	Roll out of focussed set of road safety and Healthy Streets interventions to address traffic issues and enable more walking and cycling for various Safe and Healthy Street Schemes.	Belsize Park/ Steeles Village Area	LB Camden	Plan period	As above. Schemes to include Belsize Park/ Steeles Village Area, Dartmouth Park Area, Kingsgate Road Area, South End Green Area, South Hampstead Area, and West Hampstead Area.



Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
52	Borough wide schemes - Bus priority	New and extended bus lanes and other bus priority measures such as removing parking to improve bus reliability and journey times.	Borough wide	LB Camden	Plan period	The Council maintains a rolling three year programme of investment with an annual financial allocation made by TfL to support delivery. Area based schemes are funded through a block grant from Transport for London (part of the Corridors, Neighbourhoods and Supporting Measures programme). Supplemented by funding from developer contributions and funding from LB Camden. Works closely related to development on particular sites will be sought through s106 but other works will be funded through CIL.
53	Borough wide schemes - Controlled Parking Zone reviews	Review of controlled parking zones and their hours of control.	Borough wide	LB Camden	Plan period	As above

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
54	Borough wide schemes - Cycle routes	Delivering a high quality cycle network across the Borough. Schemes include new segregated cycle corridors including (for example) Shaftsbury Avenue & Kentish Town Road/Highgate Road/ Fortess Road and the "Cross Camden Cycleway". The Council has ambitions to extend the segregated cycle network from 28km now to 40km by 2025, and much more by 2041.	Borough wide	LB Camden	Plan period	As above
55	Borough wide schemes - Cycle hire	Extending the Santander Cycle Hire network to as many areas of the Borough as feasible.	Borough wide	LB Camden	Plan period	As above
56	Borough wide schemes - Cycle action plan measures	Schemes include, cycle permeability, cargo bike initiatives, cycle training, residential cycle parking (cycle hangars) and cycle parking.	Borough wide	LB Camden	Plan period	As above
57	Borough wide schemes - Electric vehicle charging points	Implementation of a Borough-wide network of electric vehicle charging points, with support funding from public and private sector sources	Borough wide	LB Camden	Plan period	As above

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
58	Borough wide schemes - Healthy Junctions Programme	Junction improvements including traffic signal modifications to improve pedestrian and cyclist safety, for example Abbey Road / Belsize Road junction, the Gray's Inn Road/Theobald's Road junction and the York Way / Agar Grove junction.	Borough wide	LB Camden	Plan period	As above
59	Borough wide schemes – Safer Junctions Programme	Completion of our Borough-wide “Safer Junctions” programme to improve pedestrian safety and comfort at side-road junctions, as well as multiple other pedestrian improvements including new zebra crossings, continuous footways, strategic walking connections and wayfinding measures.	Borough wide	LB Camden	Plan period	As above

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
60	Borough wide schemes - Healthy School Streets & Main Road School Streets Programme	The roll-out of our Healthy School Street programme and other road safety improvements where a timed traffic restriction is not possible to every feasible location in the Borough by 2025.	Borough wide	LB Camden	Plan period	As above
61	Borough wide schemes - Micro-mobility	Extending our network of dockless e-bike and e-scooter hire parking bays, and introducing a network of green micro-mobility hubs (including e-bike and e-scooter hire bays, standard and cargo bike parking, and car clubs).	Borough wide	LB Camden	Plan period	As above
62	Borough wide schemes - Walking and accessibility action plan measures	Strategic & local walking schemes predominantly aimed at providing safer walking corridors, new pedestrian crossing points and pedestrian way finding improvements. Schemes will include new wellbeing walking routes (e.g., King's Cross Station to Euston Station).	Borough wide	LB Camden	Plan period	As above

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
63	Borough wide schemes -	Schemes include smarter travel and complementary measures, freight and servicing action plan measures, parking management programme, streateries programme, car clubs, cycling & walking awareness/ behaviour change campaigns, and school travel planning and road safety programmes.	Borough wide	LB Camden	Plan period	As above
64	Borough wide schemes - Highways maintenance and improvement	Provision, improvement, replacement, operation and maintenance of highway infrastructure (including carriageways, footways, footpaths, drainage and street lighting)	Borough wide	LB Camden	Plan period	Community Infrastructure Levy (strategic portion). Excludes site-specific accessibility improvements (highway and related works) and vehicular crossovers which will continue to be funded through developer agreements.
<b>UTILITIES AND PHYSICAL INFRASTRUCTURE</b>						
65	Water supply	Every five years water companies produce statutory Water Resources Management Plans (WRMPs) which set out the current water supply-demand balance and use population projections to ensure that future population growth is planned for.	Borough wide	Thames Water	Plan period	The WRMP contains specific resource development schemes and demand management actions.

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
66	Wastewater	<p>A London wide issue is the frequent discharge of storm sewage into the River Thames.</p> <p>The London Tideway Improvement Programme intends to address the issue through the upgrade and extension of Sewage Treatment Works, the construction of the Lee Tunnel and Thames Tideway Tunnel. The current programme of upgrades will accommodate London's growth to 2021. The Thames Tideway Tunnel is expected to be complete by 2024 (third phase).</p>	Borough wide	Thames Water	Plan period	<p>Investment is financed through charges to water company customers.</p> <p>Thames Water seeks approval of strategic growth schemes from OFWAT through a 5 year periodic review (the current five year business plan is from 2025 to 2030).</p>
67	Developing of local heating networks	Heat networks and local secondary heat sources will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs.	Borough wide	LB Camden	Plan period	<p>This will be delivered through the application of Draft Local Plan Policy CC7 and London Plan Policy SI3.</p> <p>It is possible to decarbonise existing CHP systems however, existing networks in Camden are not yet decarbonised.</p> <p>Future planning policy, frameworks and masterplans will need to take account of future / emerging Local Area Energy Plans for the borough.</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
68	Waste Management	<p>Camden's Reduction and Recycling Plan: 2023-2025.</p> <p>North London Waste Authority Residual Waste Reduction Plan 2022-2025.</p> <p>North London Waste Plan 2022-2036 (planning framework).</p> <p>North London Joint Waste Strategy 2024-2040 – in development.</p>	Borough wide and North London Waste Authority (which includes Camden)	LB Camden and North London Waste Authority	Plan period	<p>Camden's Reduction and Recycling Plan: 2023-2025 sets out how the Council will work with residents, communities, and businesses to reduce the use of packaging, particularly plastic, recycle more of our waste and move towards a more circular economy.</p> <p>The North London Waste Prevention Plan 2022-25 sets out the seven constituent boroughs' plan to reduce and prevent waste across north London and beyond. NLWA has been granted a Development Consent Order for a new Energy Recovery Facility at Edmonton EcoPark.</p> <p>NLWA notes an increase in waste capacity could occur at Powerday in Enfield in the future. Replacement facilities are also expected in Barnet and Enfield.</p> <p>To meet capacity gaps, the North London Boroughs will seek opportunities through intensification of existing sites or new facilities.</p> <p>No priority areas for new waste management facilities have been identified in LB Camden in the NLWP (2022).</p>

Item	Infrastructure item / programme name	Project/ programme description	Location	Delivery lead	Delivery period	Comments
69	Digital connectivity	<p>We Make Camden, the Council's Corporate Strategy, states they want everyone in Camden to access, and be part of, a digital society.</p> <p>The Council has committed £1.5 million to put new digital infrastructure in Camden's libraries and have invested in new technology and equipment to support digital inclusion across the borough.</p> <p>The Mayor of London identified Digital Access for All as one of the London Recovery Programme (2020) missions. The objective of the mission is to ensure that 'Every Londoner has access to good connectivity, basic digital skills and the device or support they need to be online by 2025.'</p>	Borough wide with a focus on where this maximises benefits for the community and business	LB Camden, GLA, BT Openreach and other industry partners	Plan period	'We Make Camden', the Council's Corporate Strategy, sets out 6 challenges the Council wants to achieve over the coming years. One of these challenges is that everyone in Camden can access, and be part of, a digital society. The Strategy states that in the longer term they want to ensure that no one is digitally excluded from learning, working, and participating in our community.



## Appendix 2: Locations where tall buildings may be an appropriate form of development

Map 13 in the draft new Local Plan shows where the tall building thresholds set out in Policy D2 (A) will apply in Camden and identifies locations in the borough where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan. These have been informed by the Camden Building Heights Study. A list of the sites shown on Map 13 are set out in the table below.

Map Reference	Policy Number	Site Name
a	S4 (CSP2)	120 -136 Camley Street
b	S5 (CSP3)	104 - 114 Camley Street
c	S6 (CSP4)	Parcelforce and ATS Tyre Site
d	S7 (CSP5)	St Pancras Hospital
e	S18 (HCG3)	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street
f	C2 (KT2)	Regis Road and Holmes Road Depot
g	C3 (KT3)	Murphy Site
h	C7 (CGY2)	Morrisons Supermarket
i	C10 (CGY5)	Juniper Crescent
j	C11 (CGY6)	Network Rail at Juniper Crescent
k	C13 (IDS13)	West Kentish Town Estate
l	C14 (IDS11)	Wendling Estate and St Stephens Close
m	W2 (WHI2)	O2 Centre, car park, car showrooms and 14 Blackburn Road
n	C22 (IDS20j)	Former Flats 121 – 129 Bacton, Haverstock Road
o	W11 (IDS20v)	100 Avenue Road
p	Site not allocated in the Plan	King's Cross North
q	Site not allocated in the Plan	Central Cross
r	Site not allocated in the Plan	110 High Holborn

Guidance on building heights for specific sites is set out in the relevant site allocation policies. For the three sites which are not allocated in the Plan, indicative height ranges are set out in the table below.

Site name	Indicative building height range
Freight Lane, King's Cross North	The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 15m – 56m considered the potentially appropriate height range for tall building proposals outside the viewing corridor (with height ranges up to 68m considered potentially appropriate in the eastern third of this area, subject to testing against the London View Management Framework) and 15m – 49m considered the potentially appropriate height range for tall building proposals inside the viewing corridor. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.
Central Cross	The Camden Building Height Study has identified this site as a location where a tall building may be an appropriate form of development, with 12m - 57m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.
110 High Holborn	The Camden Building Height Study has identified this site as a location where a tall building may be an appropriate form of development, with 40m - 49m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.

# Appendix 3: Noise thresholds

The significance of noise impact varies dependent on the different noise sources, receptors and times of operation presented for consideration within a planning application. Therefore, Camden’s thresholds for noise and vibration evaluate noise impact in terms of various ‘effect levels’ described in the National Planning Policy Framework and Planning Practice Guidance:

- NOEL – No Observed Effect Level
- LOAEL – Lowest Observed Adverse Effect Level
- SOAEL – Significant Observed Adverse Effect Level

Three basic design criteria have been set for proposed developments, these being aimed at guiding applicants as to the degree of detailed consideration needed to be given to noise in any planning application. The design criteria outlined below are defined in the corresponding noise tables. The values will vary depending on the context, type of noise and sensitivity of the receptor:

- Green – where noise is considered to be at an acceptable level.
- Amber – where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development.
- Red – where noise is observed to have a significant adverse effect.

## Vibration

**Table A: Vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted**

Vibration description and location of measurement	Period	Time	Vibration Levels (Vibration Dose Values)
Vibration inside critical areas such as a hospital operating theatre	Day, evening and night	00:00-24:00	0.1 VDV ms-1.75
Vibration inside dwellings	Day and evening	07:00-23:00	0.2 to 0.4 VDV ms-1.75
Vibration inside dwellings	Night	23:00-07:00	0.13 VDV ms-1.75
Vibration inside offices	Day, evening and night	00:00-24:00	0.4 VDV ms-1.75
Vibration inside workshops	Day, evening and night	00:00-24:00	0.8 VDV ms-1.75

## Proposed Developments likely to be Sensitive to Noise

Special consideration will need to be given to noise sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise likely to

have an adverse effect. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced, or likely to be experienced.

**Table B: Noise levels applicable to noise sensitive residential development proposed in areas of existing noise**

Dominant Noise Source	Assessment Location	Design Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Anonymous noise such as general environmental noise, road traffic and rail traffic ~	Noise at 1 metre from noise sensitive façade/free field	Day	<50dBL <sub>Aeq,16hr</sub> *	50dB to 72dBL <sub>Aeq,6hr</sub> *	>72dBL <sub>Aeq,16hr</sub> *
		Night	<45dBL <sub>Aeq,8hr3</sub> <40 dBL <sub>Aeq,8hr</sub> **	45dB to 62dBL <sub>Aeq,8hr</sub> * >40dBL <sub>night</sub> **	>62dBL <sub>Aeq,8hrs</sub> *
	Inside a bedroom	Day	<35dBL <sub>Aeq,16hr</sub>	35dB to 45dBL <sub>Aeq,16hr</sub>	>45dBL <sub>Aeq,16hr</sub>
		Night	<30dBL <sub>Aeq,8hr</sub> 42dBL <sub>Amax,fast</sub>	30dB to 40dBL <sub>Aeq,16hr</sub> 40dB to 73dBL <sub>Amax,fast</sub>	>40dBL <sub>Aeq,8hr</sub> >73dBL <sub>Amax,fast</sub>
	Outdoor living space (free field)	Day	<50dBL <sub>Aeq,16hr</sub>	50dB to 55dBL <sub>Aeq,8hr</sub>	>55dBL <sub>Aeq,16hr</sub>
	Non-anonymous noise	See guidance note on non-anonymous noise			

\*L<sub>Aeq, T</sub> values specified for outside a bedroom window are façade levels

\*\*L<sub>night</sub> values specified for outside a bedroom window are free field levels

The levels given above are for dwellings, however, levels are use specific and different levels will apply dependent on the use of the premises. The Council will also take into account the likely times of occupation for types of development and will be amended according to the times of operation of the establishment under consideration.

## Industrial and Commercial Noise Sources

A relevant standard or guidance document should be referenced when determining values for LOAEL and SOAEL for non-anonymous noise. Where appropriate and within the scope of the document it is expected that British Standard 4142:2014 'Methods for rating and assessing industrial and commercial sound' (BS 4142) will be used. For such cases a 'Rating Level' of 10 dB below background (15dB if tonal components are present) should be considered as the design criterion).

**Table C: Noise levels applicable to proposed industrial and commercial developments (including plant and machinery)**

Existing Noise sensitive receptor	Assessment Location	Design Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAL (Red)
Dwellings**	Garden used for main amenity (free field) and Outside living or dining or bedroom window (façade)	Day	'Rating level' 10dB* below background	'Rating level' between 9dB below and 5dB above background	'Rating level' greater than 5dB above background
Dwellings**	Outside bedroom window (façade)	Night	'Rating level' 10dB* below background and no events exceeding 57dBL <sub>Amax</sub>	'Rating level' between 9dB below and 5dB above background or noise events between 57dB and 88dB L <sub>Amax</sub>	'Rating level' greater than 5dB above background and/or events exceeding 88dBL <sub>Amax</sub>

\*10dB should be increased to 15dB if the noise contains audible tonal elements. (day and night). However, if it can be demonstrated that there is no significant difference in the character of the residual background noise and the specific noise from the proposed development then this reduction may not be required. In addition, a frequency analysis (to include, the use of Noise Rating (NR) curves or other criteria curves) for the assessment of tonal or low frequency noise may be required.

\*\*levels given are for dwellings, however, levels are use specific and different levels will apply dependent on the use of the premises.

The periods in Table C correspond to 0700 hours to 2300 hours for the day and 2300 hours to 0700 hours for the night. The Council will take into account the likely times of occupation for types of development and will be amended according to the times of operation of the establishment under consideration.

There are certain smaller pieces of equipment on commercial premises, such as extract ventilation, air conditioning units and condensers, where achievement of the rating levels (ordinarily determined by a BS:4142 assessment) may not afford the necessary protection. In these cases, the Council will generally also require a NR curve specification of NR35 or below, dependent on the room (based upon measured or predicted Leq,5mins noise levels in octave bands) 1 metre from the façade of affected premises, where the noise sensitive premise is located in a quiet background area.

## Entertainment Noise

Assessments for noise from entertainment and leisure premises must include consideration for amplified and unamplified music, human voices, footfall and vehicle movements and other general activity. Appropriate metrics must be used to measure and assess the noise impact including LAeq and LAmax metrics and appropriate frequency spectrum. Planning permission will not be granted in instances where it is not possible to achieve suitable and sufficient internal noise levels with reference to the most up to date

and appropriate guidance within proposed noise sensitive receptors despite appropriate mitigation proposals due to the totality of noise from existing entertainment venues.

**Table D: Noise levels applicable to proposed entertainment premises (customer noise)**

Noise sensitive receptor	Assessment Location	Design Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAL (Red)
Dwellings	Garden used for amenity (free field)	Day	The higher of 55dB LAeq,5min	56dB to 60dB LAeq,5min	The higher of 61dB LAeq,5min
			Or 10dB below existing LAeq,5min	Or 9dB to 3dB below existing LAeq,5min	Or 2dB below existing LAeq,5min
			Without entertainment noise	Without entertainment noise	Without entertainment noise
Dwellings	Garden used for amenity (free field)	Evening	The higher of 50dB LAeq,5min	51dB to 55dB LAeq,5min	The higher of 56dB LAeq,5min
			Or 10dB below existing LAeq,5min	Or 9dB to 3dB below existing LAeq,5min	Or 2dB below existing LAeq,5min
			Without entertainment noise	Without entertainment noise	Without entertainment noise
Dwellings	Garden used for amenity (free field)	Night	The higher of 45dB LAeq,5min	46dB to 50dB LAeq,5min	The higher of 51dB LAeq,5min
			Or 10dB below existing LAeq,5min	Or 9dB to 3dB below existing LAeq,5min	Or 2dB below existing LAeq,5min
			Without entertainment noise	Without entertainment noise	Without entertainment noise

For entertainment and plant noise rating curves should be measured as a 15 minute linear Leq at the octave band centre frequencies.

Room	Noise rating curve	Design period
Bedrooms	NR25	23:00-07:00hrs
All habitable rooms	NR35	07:00-23:00hrs

Advice note: We recommend that you seek advice from the Environmental Health department in advance of any noise surveys on the location of measurements and the nearest noise sensitive receptor. Further detail will be provided in our supplementary planning document Camden Planning Guidance on amenity.

# Appendix 4: Site allocation policy replacement schedule

Previous plan document	Previous plan reference	Replacement policy (where applicable)
Site Allocations Plan - 2013	Site 1 – King’s Cross Growth Area	N/A – Development largely complete
	Site 2 – Camden Town Hall Extension	N/A – Development is completed
	Site 3 – Lighthouse block, Pentonville Rd	N/A – Development is completed
	Site 4 – 277a Grays Inn Road	N/A – Development is completed
	Site 5 - Midland Road Site, Land to rear of The British Library	S16 (IDS19) - Land to the rear of the British Library
	Site 6 - 4 St Pancras Way (St Pancras Hospital)	S7 (CSP5) – St Pancras Hospital
	Site 7 - 103 Camley Street	N/A – Development is completed
	Site 8 - Land west of Westminster Kingsway College, 45 Sidmouth Street	N/A – Development is completed
	Site 9 - Euston Station, Euston Road	Site is within the Euston Area Plan (EAP) area. As such, the existing 2013 SAP policy will continue to be part of the development plan until a revised EAP is adopted.
	Site 10 - BHS Warehouse, 132-140 Hampstead Rd and 142 Hampstead Rd	Site is within the Euston Area Plan (EAP) area. As such, the existing 2013 SAP policy will continue to be part of the development plan until a revised EAP is adopted.
	Site 11 - Granby Terrace Depot	Site is within the Euston Area Plan (EAP) area. As such, the existing 2013 SAP policy will continue to be part of the development plan until a revised EAP is adopted.
	Site 12 - 110-122 Hampstead Road (Former National Temperance Hospital)	Site is within the Euston Area Plan (EAP) area. As such, the existing 2013 SAP policy will continue to be part of the development plan until a revised EAP is adopted.
	Site 13 - 1-39 Drummond Crescent (Euston Traffic Garage)	N/A – Development is completed

Previous plan document	Previous plan reference	Replacement policy (where applicable)
	Site 14 - Westminster Kingsway College, Regent's Park Centre, Longford Street	Site is within the Euston Area Plan (EAP) area. As such, the existing 2013 SAP policy will continue to be part of the development plan until a revised EAP is adopted.
	Site 15 - Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East/Augustus St	Site is within the Euston Area Plan (EAP) area. As such, the existing 2013 SAP policy will continue to be part of the development plan until a revised EAP is adopted.
	Site 16 - St Giles Circus	N/A – Development is completed
	Site 17 - The Royal Mail Sorting Office, 21-31 New Oxford Street	N/A – Development is completed
	Site 18 - Land Bound by New Oxford Street, Museum Street and West Central Street	Partly under Policy S18 (HCG3) – Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street, partly completed development.
	Site 19 - 12-42 Southampton Row & 1-4 Red Lion Square	Policy S17 (HCG2) – Former Central St Martins
	Site 20 - Land Bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row & Brownlow Street	N/A - No substantial development envisaged
	Site 21 - Senate House (north block) Malet Street	Policy S34 (BC2b) - Senate House (NE quadrant), Malet Street
	Site 22 - 26 Gordon Square and 15 Gordon Street	N/A – Development is completed
	Site 23 - 20-22 Gordon Street/Wates House	N/A – Development is completed
	Site 24 - Phoenix Place	Completed
	Site 25 - Herbal House, 10 Back Hill	N/A – Development is completed
	Site 26 - Land bounded by Wren Street, Pakenham Street, Cubit Street, Langton Walk	Policy S15 (IDS18) – Land at Pakenham Street and Wren Street
	Site 27 - 187-199 West End Lane	N/A – Development is completed
	Site 28 - 156 West End Lane	N/A – Development is completed
	Site 29 - O2 Centre Car park	Policy W2 (WHI2) – O2 Centre, carpark and car showroom sites
	Site 30 - 100 Avenue Road, Swiss Cottage	Policy W11 (IDS20v) – 100 Avenue Road



Previous plan document	Previous plan reference	Replacement policy (where applicable)
	Site 31 - Belsize Road Car Park	N/A – Development is completed
	Site 32 - Hawley Wharf, Water Lane and 39-45 Kentish Town Road	N/A – Development is completed
	Site 33 - 202-212 Regent's Park Road (Roundhouse car park)	N/A – Development is completed
	Site 34 - 2-12 Harmood Street and Rear of 34 Chalk Farm Road	N/A – Development is completed
	Site 35 - Bangor Wharf, Georgiana Street	Policy S9 (CSP7b) – Bangor Wharf and Eagle Wharf
	Site 36 - 57 - 71 Pratt Street, 10 - 15 Georgiana Street and Royal College Street	Considered as part of the SALP site assessment however it was decided that it was unlikely to become available.
	Site 37 - 24 - 58 Royal College Street	Policy S6 (CSP4) – Parcelforce and ATS Tyre Site
	Site 38 - 115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery	Policy C22 (IDS20j) - Bacton Low Rise, Haverstock Road
	Site 39 - 19-37 Highgate Road, Day Centre and 25 and 37 Greenwood Place	N/A – Development is under construction
	Site 40 - Kentish Town Police Station, 10A,12A, 14 Holmes Road	Policy C4 (KT4) – Kentish Town Police Station
	Site 41 - Fire Station, 20 Highgate Road	Policy C6 (KT6) – Kentish Town Fire Station
	Site 42 - Former Nurses Hostel, 29 New End	N/A – Development is completed
	Site 43 - 40-49 St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir	N/A – Development is completed
Fitzrovia Area Action Plan - 2014	Opportunity Site 1 (Astor College)	N/A – Development is completed
	Opportunity Site 2 (Middlesex Hospital annex)	N/A – Development is under construction
	Opportunity Site 3 (Arthur Stanley House)	N/A – Development is completed
	Opportunity Site 4 (Tottenham Mews)	Policy S11 (IDS2) - Former Tottenham Mews Day Hospital

Previous plan document	Previous plan reference	Replacement policy (where applicable)
	Opportunity Site 5 (Rosenheim Building)	N/A – Development is completed
	Opportunity Site 6 (Odeon Site)	N/A – Development is completed
	Opportunity Site 7 (Royal Ear Hospital)	N/A – Development is completed
	Opportunity Site 8 (Medical Students' Union)	N/A – Development is completed
	Opportunity Site 9 (Central Cross)	N/A - No substantial development envisaged
	Opportunity Site 10 (6-17 Tottenham Court Road)	N/A - Site unavailable. No development expected
	Opportunity Site 11 (80 Charlotte Street)	N/A – Development is completed
	Opportunity Site 12 (Asta House)	N/A – Development is completed
	Opportunity Site 13 (Network Building)	Policy S10 (IDS1) - Network Building and 88 Whitfield Street
	Opportunity Site 14 (61-63 TCR, 1-7 and 11-13 Goodge St)	N/A – Development is completed

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