

Schedule of proposed main modifications to the Camden Local Plan Proposed Submission Draft

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM01	Multiple policies in the Plan	Multiple paragraphs in the Plan	Propose to delete references to 'it can be demonstrated to the Council's satisfaction' or equivalent wording and replace with – <u>relevant and robust evidence is submitted to it</u> it can be demonstrated to the Council's satisfaction (or minor variations where necessary for grammatical correctness) This modification will apply to the following policies and paragraphs of the Plan – • Site Allocation S18 (4) • Site Allocation C6, Context, bullet point 2 • Policy H1 Part B (4) • Policy H1 Part B (5) • Policy H1 Part B (6) • Paragraph 7.61 (Policy H2) • Paragraph 7.141 (Policy H4) • Policy H9 Part B (2) • Policy H10 Part B (2) • Policy CC2 Part C • Policy CC2 Part C (2) • Policy CC2 Part E • Policy CC6 Part A (3) • Policy CC6 Part A (4) • Policy CC6 Part C (3) • Policy CC6 Part C (4) • Paragraph 8.83 (Policy CC6) • Policy CC9 Part A (5) • Paragraph 8.155 (Policy CC11) • Policy IE1 Part A (13) • Policy IE3 Part B • Policy IE5 Part C • Paragraph 9.133 (Policy IE9) • Policy IE10 Part A (5) • Policy SC3 Part D (1b) • Policy SC4 Part C (2) • Paragraph 10.70 (Policy SC4) • Paragraph 10.77 (Policy SC4) • Policy SC6 Part B (1) • Paragraph 10.99 (Policy SC6) • Policy SC7 Part B • Policy SC7 Part E • Policy NE2 Part A (1) • Paragraph 11.48 (Policy NE3) • Policy NE3 Part A (7) • Paragraph 11.65 (Policy NE3) • Policy D5 Part P • Paragraph 12.136 (Policy D6)	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM02	Multiple Policies in the Plan	Multiple paragraphs in the Plan	Propose to delete references to 'demonstrate to the Council's satisfaction' or equivalent wording and replace with – <u>submit relevant and robust evidence to</u> demonstrate to the Council's satisfaction (or minor variations where necessary for grammatical correctness) This modification will apply to the following policies and paragraphs of the Plan – • Site Allocation S15 (9) • Paragraph 7.60 (Policy H2) • Paragraph 7.140 (Policy H4) • Policy CC2 Part D • Policy CC4 Part B (1) • Paragraph 8.86 (Policy CC6) • Paragraph 8.127 (Policy CC9) • Policy IE10 Part A (2) • Paragraph 10.57 (Policy SC3) • Policy SC4 Part C (3) • Policy SC6 Part C (2) • Paragraph 10.100 (Policy SC6) • Paragraph 10.116 (Policy SC7) • Paragraph 12.91 (Policy D5) • Policy A4 Part A (5) • Paragraph 13.107 (Policy A4)	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM03	Multiple Policies in the Plan	Multiple paragraphs in the Plan	Propose the following modification where the phrase 'justified to the Council's satisfaction' is used in the Plan - justified <u>through the submission of relevant and robust evidence to the Council's satisfaction</u> This modification will apply to the following paragraphs in the Plan – • Paragraph 7.313 (Policy H9) • Paragraph 7.351 (Policy H10) • Paragraph 8.22 (Policy CC2)	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM04		1.17 and 1.18	Propose the following modifications to paragraphs 1.17 and 1.18 – Supplementary planning <u>documents guidance</u> 1.17 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 include: • Camden Planning Guidance – a series of <u>documents guidance</u> that expand on the policies in the Local Plan to provide further guidance on how we will apply our planning policies. These can be viewed on the Council's website. • Planning Frameworks – a series of briefs and frameworks to help support and guide the redevelopment of specific sites and areas in Camden. These can be viewed on the Council's website. 1.18 These documents <u>provide informal guidance. They are material considerations in planning decisions but have less weight in decision making than as</u> Camden's development plan documents, but they are important supporting documents and material considerations in planning decisions.	To respond to action 3 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM05		1.38	Propose the following modification to paragraph 1.38 – Indicative housing capacities are identified for allocated sites. It is important to note that these are indicative and therefore are not fixed figures that must be adhered to exactly. Indicative housing capacities have been identified based on adopted area frameworks, neighbourhood plan policies, existing planning permissions and design-led site capacity work. <u>Where site allocations in the Local Plan have an existing planning permission, the housing numbers agreed through the permission will be considered to be the minimum number of homes to be provided in any future scheme.</u>	To respond to action 70 in ED89 Actions and Modifications Table
MM06		1.39	Propose the following modification to paragraph 1.39 – <u>Policy CC2 Prioritising the retention of existing buildings sets out a presumption in favour of the retention and improvement of existing buildings. Where schemes come forward Schemes that propose substantial or full demolition of existing buildings, applicants on allocated sites will need to comply with the requirements set out in Policy CC2 (Retention of Existing Buildings), with the exception of schemes that come forward on site allocations S5, S6, S7, S13, S20, C10, C12, C17, W6, and N4, where only Part E of Policy CC2 will apply, as these allocations assume full demolition.</u> If it can be demonstrated to the Council's satisfaction that an existing building cannot be retained and improved upon, and demolition is permitted, then the development capacity of the site will be agreed as part of the planning application process, in accordance with the development plan.	To respond to action 33 in ED89 Actions and Modifications Table
MM07		1.40	Propose the following modification to paragraph 1.40 – <u>The Local Plan seeks to maximise the delivery of permanent self-contained homes across the borough. Given this, where a scheme comes forward on a site allocation that proposes a A larger number of homes than set out in the indicative capacity for that site, this may be supported where it is shown that the proposed quantity of development 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. Conversely, where a scheme comes forward on a site allocation that proposes a A lower number of homes than set out in the indicative capacity for that site, this will only be supported where relevant and robust evidence is provided to justify the reduced level of housing provision.</u> 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.	To respond to the action in the Inspector's Post Hearings Letter ED90
MM08		Following 1.44	Propose the following modification to insert a new section in the introduction following para 1.44 – <u>Policy requirements for evidence</u> <u>Where a policy in this Plan requires relevant and robust evidence to be submitted as part of a planning application, applicants must submit up to date evidence, referencing relevant standards and/or guidance, and robust data. This must address all material factors relevant to the policy criterion.</u>	To respond to the action in the Inspector's Post Hearings Letter ED90
MM09	Policy S1 – South Camden		Propose the following modification Policy S1 Part Q – The Council will continue to protect the concrete plant at King's Cross, which is designated as an Aggregates Safeguarding Area on the Local Plan Policies Map. <u>In assessing any proposals for housing or other sensitive land uses in the vicinity of the Aggregates</u>	To respond to action 87 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>Safeguarding Area, the Council will apply the Agent of Change principle in line with Policy A1 Protecting Amenity.</u>	
MM10	Policy S2 Euston Area		Propose the following modification to Policy S2 to insert a new criterion in Part A after criterion 1 - To realise the vision and objectives set out in the Euston Area Plan, the Council will:.... <u>2. Support the optimisation of development in the Euston area, recognising the opportunity to secure long-term benefits and deliver nationally significant transport infrastructure;</u> Renumber subsequent criterion	For clarity - in response to Lendlease and the Euston Landowners comments (Responder ID 619)
MM11	Policy S2 Euston Area		Propose the following modification to Policy S2 Part A criterion 3 - expect development to deliver new and replacement employment floorspace across the Euston Area, and support and prioritise the creation and retention of suitable employment floorspace for <u>employment, education</u> , research, learning and knowledge-based uses <u>to enhance Euston's role and image in the central London and national economy;</u> ...	For clarity – to respond to the comments made by UCL (Responder ID 523) and the comments made by Lendlease and the Euston Landowners in their response to the Inspector's Matters, Issues and Questions (ED26).
MM12	Policy S2 Euston Area	3.19	Propose to insert the following new paragraph after paragraph 3.19 – <u>3.20 Due to the uncertainty around station design and proposals for enabling work at Euston, the Council acknowledges that a degree of flexibility will be necessary in the implementation of policies in the Local Plan and Euston Area Plan, alongside the consideration of wider costs associated with the delivery of constrained sites, and changing economic and market circumstances. This reflects the approach set out in paragraphs 15.34 to 15.36 of this Plan.</u> Renumber subsequent paragraphs.	In response to the comments made by Lendlease and the Euston Landowners in their response to the Inspector's Matters, Issues and Questions (ED26).
MM13	Policy S2 Euston Area	3.19 / 3.20	Propose to insert the following new paragraph after the new paragraph 3.20 - <u>3.21 Much of the development capacity at Euston is on land created by the redevelopment of the stations and tracks and as designs for the stations are still emerging, the exact amount of development will be determined by the amount of land that is enabled, and the ability to overcome constraints associated with railway infrastructure, particularly the cost and viability of the complex enabling works. Should new areas for development be identified through design refinement of the stations and / or work to meet the ambition to deliver new homes in the wider Euston area, it may be possible to deliver in excess of the development identified in Policy S2. Further engagement with local communities will be required.</u> Renumber subsequent paragraphs.	To provide further information – in response to Lendlease and the Euston Landowners comments (Responder ID 619)
MM14	Policy S4 Bloomsbury Campus Area		Propose the following modification to Policy S4, Part A.4 – consolidate, <u>improve</u> and increase academic space	For clarity – to respond to the comments made by UCL (Responder ID 523)
MM15	Site Allocation Policy S5 120–136 Camley Street		Propose the following modification to Site Allocation S5 'other considerations' to amend the second bullet point – 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 that work has recently been undertaken. <u>Applicants will be expected</u>	To respond to Thames Water comments (Responder ID 409)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development.</u>	
MM16	Site Allocation Policy S5 120 – 136 Camley Street		Propose the following modification to Site Allocation S5 to delete the fourth bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM17	Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate		Propose the following modification to Site Allocation S6 to insert a new criterion - <u>19. - seek to contribute towards improved access to bus services in the local area.</u>	For clarity – to respond to TfL comments (Responder ID 604)
MM18	Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate		Propose the following modification to Site Allocation S6 'other considerations' to delete the second bullet point and replace with – 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. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary and upgrades to the wastewater network may also be required. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required .</u>	To respond to Thames Water comments (Responder ID 409)
MM19	Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate		Propose the following modification to Site Allocation Policy S6 to delete the fifth bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM20	Site Allocation Policy S7 24-86 Royal College Street (Parcelforce and ATS Tyre Site)		Propose the following modification to Site Allocation Policy S7 'indicative housing capacity' – 200 <u>280</u> additional self contained homes	To respond to action 74 in ED89 Actions and Modifications Table
MM21	Site Allocation Policy S7 24-86 Royal College Street		Propose the following modification to Site Allocation S7 'other considerations' to amend the second bullet point –	To respond to Thames Water comments (Responder ID 409)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
	(Parcelforce and ATS Tyre Site)		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 that work has recently been undertaken. <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development.</u>	
MM22	Site Allocation Policy S7 24-86 Royal College Street (Parcelforce and ATS Tyre Site)		Propose the following modification to Site Allocation S7 to delete the third bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM23	Site Allocation Policy S8 St Pancras Hospital		Propose the following modification to Site Allocation S8 Criterion 5 – explore opportunities to create an active and engaging street frontage along Granary Street and St Pancras Way, <u>for example through the inclusion of small scale ground floor retail or food or drink uses for placemaking purposes.</u>	To respond to action 77 in ED89 Actions and Modifications Table
MM24	Site Allocation S8 St Pancras Hospital		Propose the following modification to Site Allocation S8 to add an additional bullet point at the start of the 'other considerations' section – <u>Given that this site allocation involves the delivery of a publicly funded health facility, the Council will not apply the provisions of Policy H2 to any development of the remainder of the site.</u>	To respond to action 12 in ED89 Actions and Modifications Table
MM25	Site Allocation Policy S8 St. Pancras Hospital		Propose the following modification to Site Allocation S8 'other considerations' to amend the second bullet point – 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 that work has recently been undertaken. <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development.</u>	To respond to Thames Water comments (Responder ID 409)
MM26	Site Allocation Policy S9 Shorebase Access		Propose the following modification to Site Allocation S9, 'other considerations' to remove the second bullet point - 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 that work has recently been undertaken.	To respond to Thames Water comments (Responder ID 409)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM27	Site Allocation Policy S10 Bangor Wharf and Eagle Wharf		Propose the following modification to Site Allocation S10 criterion 13 – retain or reuse (on site) the granite setts at Bangor Wharf, <u>taking account of their condition.</u>	To respond to action 80 in ED89 Actions and Modifications Table
MM28	Site Allocation Policy S11 Former Royal National Throat, Nose and Ear Hospital		Propose the following modification to Site Allocation S11 'other considerations' to delete the third bullet point and replace with – 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 that work has recently been undertaken. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	To respond to Thames Water comments (Responder ID 409)
MM29	Site Allocation Policy S12 Belgrove House		Propose to delete Site Allocation S12 from the Plan. Renumber subsequent site allocations.	The development of this site will be complete by the end of 2026.
MM30	Site Allocation Policy S13 Former Thameslink Station, Pentonville Road		Propose the following modification to Site Allocation S13 to delete the third bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM31	Site Allocation Policy S16 Former Central St Martins College		Propose the following modification to Site Allocation S16 'other considerations' to insert an additional bullet point under the first bullet point – <u>Given its special architectural and historic interest, a photographic and recording report relating to the back stage facilities and machinery of the Cochrane Theatre will be required to be submitted, as secured in planning permission 2020/2470/P</u>	To reflect the existing planning permission
MM32	Site Allocation Policy S20 York Way Depot and adjacent land at Freight Lane		Propose the following modification to Site Allocation S20 criteria 6 – ensure that the design and layout of the scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities, <u>including the Aggregates Safeguarding Area identified on the Local Plan Policies Map</u> , in accordance with the Agent of Change principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity);	To respond to action 86 in ED89 Actions and Modifications Table
MM33	Site Allocation Policy S20 York Way Depot and adjacent land at Freight Lane		Propose the following modification to Site Allocation S20 to delete the second bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular	To respond to action 32 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	
MM34	Site Allocation Policy S27 Middlesex Hospital Annex 44 Cleveland Street		Propose to delete Site Allocation S27 from the Plan. Renumber subsequent site allocations.	The development of this site will be complete by the end of 2026.
MM35	Site Allocation Policy S29 Charlton Street, Godwin and Crowndale Estate		Propose to delete Site Allocation S29 from the Plan. Renumber subsequent site allocations.	The development of this site will be complete by the end of 2026.
MM36	Policy S30 Birkbeck College, Malet Street		Propose the following modification to Site Allocation S30 'allocated uses' – permanent self-contained homes <u>Higher education (academic and ancillary space)</u>	To correct an error in the published Plan
MM37	Policy C1 Central Camden		Propose to delete and replace the wording in Policy C1 Part K – The Council will continue to support and protect the town centres of Kilburn High Road, Finchley Road/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 Designated Centres and Essential Services). <u>The Council will manage and protect the stock of offices in the Central area of Camden. Proposals for small to medium-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).</u>	To correct a typographical error
MM38	Site Allocation Policy C2 Regis Road and Holmes Road Depot		Propose the following modification to Site Allocation C2 'other considerations' to delete the fifth bullet point and replace with – 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 a detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water and waste networks will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	To respond to Thames Water comments (Responder ID 409)
MM39	Site Allocation Policy C3 Murphy Site		Propose the following modification to Site Allocation C3 'other considerations' to delete the fifth bullet point and replace with – 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 a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	
MM40	Site Allocation Policy C4 Kentish Town Police Station		Propose the following modification to Site Allocation C4 criterion 4 – seek to retain the Section House building in accordance with Policy CC2 (Retention of Existing Buildings) and re-use to provide student accommodation, <u>if no longer needed for police use</u> . Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation)	To respond to the comments made by the Met Police (Responder ID 8)
MM41	Site Allocation Policy C10 Juniper Crescent		Propose the following modification to Site Allocation C10 to delete the second bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM42	Site Allocation Policy C12 Gilbeys Yard		Propose the following modification to Site Allocation C12 to delete the third bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM43	Site Allocation Policy C12 Gilbeys Yard		Propose the following modification to Site Allocation C12 'other considerations' to amend the sixth bullet point - Applicants will be expected to liaise with Thames Water early in the design process <u>to agree whether modelling work is required to understand to investigate</u> 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 a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)
MM44	Site Allocation Policy C12 Gilbeys Yard		Propose the following modification to Site Allocation C12 'other considerations' to insert new bullet point after the seventh bullet point - <u>Proposals should include a strategy for responding to the National Grid Electricity Transmission (NGET) underground Cable Route present within / adjacent to the site, which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design</u>	To respond to National Grid comments (Responder ID 400)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM45	Site Allocation Policy C13 West Kentish Town Estate		Propose the following modification to Site Allocation C13 'other considerations' to delete the second bullet point and replace with the following wording - 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 a detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required</u>	To respond to Thames Water comments (Responder ID 409)
MM46	Site Allocation Policy C15 Wendling Estate and St Stephens Close		Propose the following modification to Site Allocation C15 'other considerations' to delete the second bullet point and replace with the following wording - 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 a detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	To respond to Thames Water comments (Responder ID 409)
MM47	Site Allocation Policy C16 Shirley House		Propose the following modification to Site Allocation C16 'other considerations' to insert a new bullet point after the fourth bullet point - <u>Proposals should include a strategy for responding to the National Grid Electricity Transmission (NGET) underground Cable Route present within/adjacent to the site, which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design.</u>	To respond to National Grid comments (Responder ID 400)
MM48	Site Allocation Policy C16 Shirley House		Propose the following modification to Site Allocation C16 'other considerations' to insert a new bullet point after the proposed new fifth bullet point (see MM60 above) - <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development.</u>	To respond to Thames Water comments (Responder ID 409)
MM49	Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 'allocated uses' - Permanent self-contained homes and student accommodation, employment uses (including maker spaces, creative industries and offices), retail, and food and drink uses (on the ground level) <u>and station infrastructure</u>	In response to comments from Places for London / Network Rail (Responder ID 595)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM50	Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 criterion 15 – contribute towards, and help deliver, provide step-free access to, <u>and capacity improvements at</u> , Camden Town underground station	To respond to action 55 in ED89 Actions and Modifications Table
MM51	Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 to delete the second bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>Full demolition has been assumed on the basis that station improvement works come forward on this site. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site related to station improvement works. Any proposals for development on this site not related to station improvement works will be assessed against Policy CC2 in full.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM52	Site Allocation Policy C18 UCL Campus, 109 Camden Road		Propose the following modification to Site Allocation C18 'other considerations' to amend the third bullet point - Applicants will be expected to liaise with Thames Water early in the design process <u>to agree whether modelling work is required to understand to investigate</u> whether the existing water supply network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)
MM53	Site Allocation C20 Highgate Centre, Highgate Road		Propose to delete Site Allocation C20 from the Plan. Renumber subsequent site allocations.	The development of this site will be complete by the end of 2026.
MM54	Site Allocation Policy C21 Grand Union House, 18-20 Kentish Town Road		Propose the following modification to Site Allocation C21 'allocated uses' - Employment (office) , retail (ground floor) and permanent self contained homes	For clarity
MM55	Site Allocation Policy C23 Former flats 121-129 Bacton, Haverstock Road		Propose the following modification to Site Allocation C23 'key considerations' to insert the following wording at the end of the sentence - <u>Development must be designed to respect the setting of the adjacent Grade I listed St Martin's Church.</u>	To respond to action 59 in ED89 Actions and Modifications Table
MM56	Site Allocation Policy C27 Land adjacent to Constable House, Adelaide Rd		Propose the following modification to Site Allocation Policy C27 'allocated uses' – Gypsy and Traveller accommodation <u>Permanent Gypsy and Traveller pitches</u>	To respond to action 60 in ED89 Actions and Modifications Table
MM57	Site Allocation Policy W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road		Propose the following modification to Site Allocation W2 'other considerations' to delete the third bullet point and replace with the following wording - 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 a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water and waste networks will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required</u>	
MM58	Site Allocation Policy W6 Land to the rear of Meridian House, 202 – 204 Finchley Road		Propose the following modification to Site Allocation W6 to delete the second bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition of the caretaker's cottage to the rear of Meridian House. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to proposals for this part of the site. The re-development of other parts of the site, including Meridian House, is not envisaged and would need to be justified in accordance with Policy CC2 (Prioritising the retention of existing buildings).</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM59	Site Allocation Policy W11 Abbey Co-op Housing Site		Propose to delete Site Allocation W11 from the Plan. Renumber subsequent site allocations.	To respond to action 92 in ED89 Actions and Modifications Table
MM60	Site Allocation Policy W13 551-557 Finchley Road		Propose to delete Site Allocation W13 from the Plan.	To respond to action 93 in ED89 Actions and Modifications Table
MM61	Site Allocation Policy W14 317 Finchley Road		Propose to delete Site Allocation W14 from the Plan.	To respond to action 94 in ED89 Actions and Modifications Table
MM62	Site Allocation Policy N3 Queen Mary's House		Propose the following modification to Site Allocation N3 'other considerations' to delete the fourth bullet point – 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 a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)
MM63	Site Allocation Policy N4 Hampstead Delivery Office		Propose the following modification to Site Allocation N4 to delete the first bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM64	Policy H1 Maximising Housing Supply		Propose the following modification to Policy H1 Part A –	To respond to the comments from the GLA (Responder ID 13)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			The Council will aim to deliver at least 11,550 additional homes from 2026/27 to 2040/41. <u>This includes the final three years of the London Plan 2021 housing target for Camden (1,038 homes per year for years 2026/27, 2027/28 and 2028/29 of the Plan period).</u>	
MM65	Policy H1 Maximising housing supply		Propose the following modification to Policy H1 Part B 2 – supporting other forms of permanent housing to meet more specific needs, such as purpose-built student accommodation, <u>housing with shared facilities (including large-scale purpose-built shared living)</u> , and housing for people with care or support requirements	To respond to action 11 in ED89 Actions and Modifications Table
MM66	Policy H1 Maximising housing supply	7.25	Propose the following modification to paragraph 7.25 – If an alternative permanent housing use is proposed on a site identified for permanent self-contained housing, the Council will expect the submission of <u>relevant and robust</u> evidence to demonstrate that there is no <u>realistic reasonable</u> prospect of a viable development for permanent self-contained housing coming forward <u>within the Plan period in the short to medium term</u> . If an alternative non-housing use is proposed on any site identified for permanent housing, the Council will expect the submission of evidence to demonstrate that there is no <u>realistic reasonable</u> prospect of a viable development for any form of permanent housing coming forward <u>within the Plan period in the short to medium term</u> ...	To respond to action 72 in ED89 Actions and Modifications Table and the action in the Inspector's Post Hearings Letter ED90
MM67	Policy H1 Maximising housing supply	7.29	Propose the following modification to paragraph 7.29 – 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 permanent housing (prioritising self-contained 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 <u>through the submission of relevant and robust evidence to the satisfaction of the Council</u> that the site is unsuitable for permanent housing (e.g. in terms of the amenity of occupiers) or there is no <u>reasonable realistic</u> prospect of a viable development for permanent housing coming forward <u>within the Plan period in the short to medium term</u>.	To respond to action 72 in ED89 Actions and Modifications Table and the action in the Inspector's Post Hearings Letter ED90
MM68	Policy H4 Maximising the supply of affordable housing		Propose the following modification to Policy H4 Part A – The Council supports the London Plan's strategic target for <u>50% of London's new homes to be genuinely affordable homes</u> . The Council will: <u>follow the London Plan's threshold approach to applications, subject to the provisions in Parts B to F below;</u> <u>aim to maximise the supply of affordable housing; to meet or exceed a borough wide delivery target of 3,000 additional affordable homes from 2026/27 - 2040/41;</u> and <u>aim to achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing."</u>	To respond to action 10 in ED89 Actions and Modifications Table
MM69	Policy H4 Maximising the supply of affordable housing		Propose the following modification to Policy H4 Part B (5) -	To respond to action 10 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			in the case of larger developments, the London Plan's strategic affordable housing target of 50% threshold approach to applications will apply, but will be subject to the London Plan's viability threshold approach ;	
MM70	Policy H4 Maximising the supply of affordable housing	Before para 7.105	Propose to insert two new paragraphs after paragraph 7.105 - <u>In seeking the delivery of affordable housing in Camden, the Council will follow the London Plan's threshold approach to applications, as set out in paragraphs 7.118 to 7.121 below. The London Plan sets out how the Mayor's powers will be used to seek delivery of more affordable housing than would arise directly from the threshold approach. These powers include the use of grant to fund the delivery of additional affordable homes, and the use of Mayoral influence on public land holdings to deliver 50% affordable housing across the entire portfolio (but not necessarily on individual sites).</u> <u>In the context of Camden, the Council does not expect that the 50% strategic target will be met across the Plan period. Factors that would prevent delivery of 50% of homes as genuinely affordable in Camden include the following:</u> <u>a high proportion of the homes in the borough are delivered from sites which each involve fewer than 10 additional homes and where on-site delivery of affordable housing is not sought (25% of homes completed from 2015-2025);</u> <u>Camden has existing high land values and a corresponding high cost of delivering affordable homes, which limits the potential for grant funding to bring forward additional affordable homes;</u> <u>there are relatively few public land holdings in the borough that the Mayor can influence to increase affordable housing delivery (for example, there are no London Underground or Transport for London rail depots)."</u> Renumber subsequent paragraphs.	To respond to action 6 in ED89 Actions and Modifications Table
MM71	Policy H4 Maximising the supply of affordable housing	Before para 7.118	Propose a modification to amend sub-heading " Larger developments and the London Plan's <u>Viability threshold approach to applications</u> "	To respond to actions 6 and 10 in ED89 Actions and Modifications Table
MM72	Policy H4 Maximising the supply of affordable housing	7.118	Propose the following modification to paragraph 7.118 and the insertion of a new paragraph after 7.118 - As set out in Part B of Policy H4, larger developments are considered to be those with capacity for 16 additional homes or more. Under our approach to capacity assessment, these will generally be developments involving an additional housing floorspace of 1,550 sqm GIA or more. For larger developments, the London Plan's strategic affordable housing target will apply, but will be considered in tandem with the London Plan's viability threshold approach <u>to applications will apply</u>. <u>The London Plan's thresholds refer to the percentage of affordable housing that must be provided to avoid the requirement to submit a financial viability appraisal justifying the proportion of affordable housing proposed as part of a planning application. The Local Plan refers to these as viability thresholds to distinguish them from the affordable housing threshold at which the requirement for a contribution to affordable housing commences.</u> Renumber subsequent paragraphs.	To respond to actions 6 and 10 in ED89 Actions and Modifications Table
MM73	Policy H4 Maximising the supply of affordable housing	7.119	Propose the following modification to paragraph 7.119 and the insertion of a new paragraph after 7.119 -	To respond to actions 6 and 10 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			The Council will operate the London Plan viability thresholds prevailing at the time of determining an application, taking into account the proportion of floor area and the proportion of habitable rooms in each tenure. For developments that must be referred to the Mayor under the provisions of the relevant legislation, the proportion of habitable rooms in each tenure will be the primary consideration. The London Plan indicates that where the proportion of affordable housing reaches or exceeds the relevant threshold level, The London Plan indicates that where the proportion of affordable housing reaches or exceeds the relevant threshold level, an application can follow the fast-track route, subject to meeting further requirements specified in the London Plan. For an application following the fast track route: - there is no requirement to submit a financial viability appraisal in support of the application; but that - if construction has not adequately progressed after a specified period (usually two years after permission is granted), an early stage viability review will be sought to indicate whether there is potential for any additional affordable housing contribution." Where the proportion of affordable housing fails to reach the relevant threshold level, the London Plan indicates that an application must follow the viability-tested route. Details of the requirements associated with viability testing are provided in paragraphs 7.154 to 7.156 below. Renumber subsequent paragraphs.	
MM74	Policy H4 Maximising the supply of affordable housing	7.155	Propose the following modification to paragraph 7.155 – 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 following either the London Plan fast track or viability tested routes, we will seek an early stage viability review at a specified period (usually two years after permission is granted). For schemes defined by following the London Plan's as viability tested routes schemes, the Council will also 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.	To ensure consistency with London Plan Policy H5, and clarify that an early stage review is also sought for schemes following the viability tested route.
MM75	Policy H4 Maximising the supply of affordable housing	7.124	Propose the following modification to paragraph 7.124 – We will expect applications to adhere as closely as possible to the guideline mix set out in Policy H4 Part B6. However, the The guideline mix will be applied flexibly taking into account the need to achieve a rational division of the development in terms of homes of appropriate sizes and tenures, and the criteria in Policy H4, and in In certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing.	To respond to the comments from the GLA (Responder ID 13)
MM76	Policy H4 Maximising the supply of affordable housing	7.154	Propose the following modification to paragraph 7.154 – For smaller development proposals that do not provide affordable housing in accordance with the sliding scale (set out in paragraph 7.116), and larger development proposals that do not meet the London Plan viability thresholds (set out in paragraph 7.120 of this Plan and Policy H5 of the London Plan 2021). In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability in negotiating the affordable housing contribution, including We will take account of the availability of public subsidy, particular costs associated with the development (such as restoration of heritage assets and	To respond to the comments from the GLA (Responder ID 13)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build to rent housing). Subject to <u>Where development proposals do not satisfy the relevant sliding scale target or the</u> 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.	
MM77	Policy H9 Purpose-built student accommodation		Propose the following modification to Policy H9 Part B(1) - 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: 1. will not involve a disproportionate loss of self-contained homes (particularly homes with 3 bedrooms), having regard to the overall addition to housing supply; <u>will not involve the net loss of 2 or more self-contained homes (particularly homes with 3 bedrooms), unless relevant and robust evidence is submitted to the Council to demonstrate that the loss of self-contained homes will be outweighed by the significant contribution the proposal makes to both overall housing supply and meeting identified housing needs;</u>	To respond to action 14 in ED89 Actions and Modifications Table
MM78	Policy H9 Purpose-built student accommodation	7.283	Propose the following modification to paragraph 7.283 – 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. In addition, <u>the Census 2021 indicates that only 20% of Camden's existing households occupy three bedroom homes and</u> Camden's Local Housing Needs Assessment indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a three bedroom home. Nevertheless, additional student accommodation contributes towards meeting our housing target (with 2.5 student rooms treated as equivalent to one home) , addresses a permanent housing need, and can reduce the pressure for students to share existing large homes. Balancing these considerations, the Council will seek to minimise the loss of self-contained homes, <u>particularly those</u> with 3 bedrooms, and expect any student housing developments that involve <u>the loss of two or more</u> self-contained homes to create a <u>significant</u> net positive contribution to meeting the borough's housing target, <u>and meeting the specific housing needs identified by this Plan. In calculating the net effect of the proposal the Council will apply the conversion ratio set out in the London Plan (which is currently 2.5:1, where 2.5 student rooms is treated as equivalent to one home).</u> Renumber subsequent paragraphs.	To respond to action 14 in ED89 Actions and Modifications Table
MM79	Policy H9 Purpose-built student accommodation	7.284	Propose the following modification to paragraph 7.284 – In preparing the Local Plan we have assessed the most suitable uses for each allocated site, and have identified several allocations where student accommodation could be provided. Where planning permission has been granted for self-contained housing, self-contained housing has been assessed as a suitable and deliverable use. Given that permanent self-contained housing is this Plan's priority land-use, the Council will resist the development of student accommodation on a site allocated for self-contained homes, or a site that has an existing consent for self-contained housing, unless evidence is submitted to demonstrate that there is no reasonable realistic prospect of a viable development for permanent self-contained housing coming forward <u>within the Plan period in the short to medium term.</u>	To respond to action 72 in ED89 Actions and Modifications Table and the action in the Inspector's Post Hearings Letter ED90
MM80	Policy H10 Housing with shared facilities (including		Propose the following modification to Policy H10 Part B(1) –	To respond to action 14 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
	large-scale purpose-built shared living)		The Council will support development of housing with shared facilities provided that the development: 1. will not involve a disproportionate loss of self-contained homes (particularly homes with three bedrooms), having regard to the overall addition to housing supply; will not involve the net loss of 2 or more self-contained homes (particularly homes with 3 bedrooms), unless relevant and robust evidence is submitted to the Council to demonstrate that the loss of self-contained homes will be outweighed by the significant contribution the proposal makes to both overall housing supply and meeting identified housing needs;	
MM81	Policy H10 Housing with shared facilities (including large-scale purpose-built shared living)	7.330	Propose the following modification to paragraph 7.330 – 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. In addition, <u>the Census 2021 indicates that only 20% of Camden's existing households occupy three bedroom homes and</u> Camden's Local Housing Needs Assessment indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a 3 bedroom home. Nevertheless, additional housing with shared facilities contributes towards meeting our housing target, addresses a permanent housing need, and can reduce the pressure for unrelated adults to share existing large homes. Balancing these considerations, the Council will seek to minimise the loss of self-contained homes, <u>particularly those</u> with 3 bedrooms, and expect any development of shared accommodation that involves <u>the</u> loss of <u>two or more</u> self-contained homes to create a <u>significant</u> net positive contribution to meeting our housing target, <u>and meeting the specific housing needs identified by this Plan. In calculating the net effect of the proposal the Council will apply the conversion ratio set out in the London Plan (which is currently 1.8:1, where 1.8 bedrooms/units is treated as equivalent to one home).</u> Renumber subsequent paragraphs.	To respond to action 14 in ED89 Actions and Modifications Table
MM82	Policy H10 Housing with shared facilities (including large-scale purpose-built shared living)	7.331	Propose the following modification to paragraph 7.331 – Where we have allocated sites specifically for self-contained housing in the Local Plan, or have granted permission for self-contained housing, we consider this to be a suitable and deliverable use. Given this Plan's priority land-use, the Council will resist proposals for the development of housing with shared facilities on a site allocated for self-contained homes, or a site that has an existing consent for self-contained housing, unless evidence is submitted to demonstrate that there is no reasonable realistic prospect of a viable development for permanent self-contained housing coming forward within the Plan period in the short to medium term.	To respond to action 72 in ED89 Actions and Modifications Table and the action in the Inspector's Post Hearings Letter ED90
MM83	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part A – The Council will aim to secure a sufficient supply of pitches / plots to meet the accommodation needs of Camden's established Traveller community over the Plan period to 2041. <u>This includes a target of 13 additional pitches by 2035/36.</u>	To accord with London Plan Policy H14
MM84	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part C – To help meet the accommodation needs of Camden's established Traveller community the following sites have been allocated in the Local Plan to deliver <u>six</u> permanent Traveller pitches:...	For clarity – in response to comments from London Gypsies and Travellers (Responder ID 294)
MM85	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part D –	To respond to the comments from the GLA (Responder ID 13)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>The Council will support the delivery of windfall sites to help meet the accommodation needs of Camden's Traveller community.</u> The Council will require new sites, pitches and/or plots for Travellers to:	
MM86	Policy H11 – Accommodation for travellers		Propose the following modification to Policy H11 Part D (7) – be attractive and of the highest design quality;	To respond to action 15 in ED89 Actions and Modifications Table
MM87	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11 Part D (following criterion 8) - <u>9. be designed in consultation with representatives of the local Traveller community. Applications for new sites, pitches and/or plots for Travellers should be accompanied by a detailed Management Plan.</u>	For clarity – in response to comments from London Gypsies and Travellers (Responder ID 294)
MM88	Policy H11 Accommodation for travellers	7.364	Propose to insert a new paragraph after paragraph 7.364 – <u>It is envisaged that the land adjacent to Constable House (Site Allocation C27) could accommodate two Gypsy and Traveller pitches and that the land at York Way Depot and adjacent land at Freight Lane (Site Allocation S20) could accommodate up to four Gypsy and Traveller pitches. However, further design and feasibility work will be required to establish the exact number of pitches that can be delivered on these sites. A further pitch has also recently been provided on the existing Traveller site at Carol St in Camden, which also counts towards meeting the identified need. This means there is a shortfall of 6 pitches against the Council's ten year pitch target of 13 pitches to 2035/36. Given this, Policy H11 supports the delivery of windfall sites (unallocated sites) to help meet this need subject to the criteria set out in Policy H11 Part D.</u> Re-number subsequent paragraphs.	To respond to the comments from the GLA (Responder ID 13)
MM89	Policy CC2 Prioritising the retention of existing buildings		Propose the following modification to Policy CC2 Part B – Developers considering the substantial demolition of existing buildings will be expected to undertake the following assessments, before progressing detailed proposals for submission: 1. a condition and feasibility assessment, which should be undertaken at the earliest opportunity; and 2. <u>a</u> development options appraisal, <u>where appropriate</u> , which should...	For clarity – to respond to comments made by the London Property Alliance (Responder ID 637) and others
MM90	Policy CC2 Prioritising the retention of existing buildings		Propose the following modification to Policy CC2 Part C – The Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council's satisfaction that: 1. there are significant structural issues with the existing building that would prevent it from being retained and improved; <u>or</u> 2. the developer has comprehensively explored a range of feasible alternative development options, informed by the condition and feasibility assessment, prior to considering substantial demolition, and it has been demonstrated to the Council's satisfaction that the existing building cannot be retained or improved; <u>and</u> 3. the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and optimises site capacity.	For clarity - to respond to comments made by the London Property Alliance (Responder ID 637) and others
MM91	Policy CC2 Prioritising the retention of existing buildings	8.15	Propose to insert the following new paragraph after paragraph 8.15 –	For clarity - to respond to comments made by the London Property Alliance (Responder ID 637) and others

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>Furthermore, where the condition and feasibility assessment shows that there may be significant structural issues present, which mean the retention of the existing building is not feasible, a development options appraisal will not be required.</u> Renumber subsequent paragraphs.	
MM92	Policy CC2 Prioritising the retention of existing buildings	8.24	Propose the following modification to the fourth bullet point in paragraph 8.24 – When assessing whether the proposal constitutes the best use of the site the Council will consider:..... • public benefit, including but not limited to, the delivery of social and community infrastructure, open space, active travel measures, <u>public transport infrastructure</u>, affordable workspace, a significant uplift in jobs and estate regeneration;	For clarity – to respond to comments made by Places for London (Responder ID 595)
MM93	Policy CC2 Prioritising the retention of existing buildings	8.26	Propose the following modification to paragraph 8.26 – Development proposals that involve less than substantial demolition or substantial demolition must include a pre-demolition audit to identify all materials within the building and document how they will be managed in line with the waste hierarchy.	To respond to comments from Shaftesbury Capital (Responder ID 583)
MM94	Policy CC3 Circular economy and reduction of waste		Propose the following modification to Policy CC3 Part C – The Council will require applications for <u>new build</u> major development (and major development which involves substantial demolition and rebuild) to submit a Circular Economy Statement.	For clarity - to respond to comments from Hilson Moran (Responder ID 507)
MM95	Policy CC3 Circular economy and reduction of waste	8.37	Propose the following modification to Paragraph 8.37 – For <u>new build</u> major applications (providing 10 or more new homes or 1,000 square meters or more of new or replaced floorspace), or major applications which involve substantial demolition and rebuild, this information should be provided as part of the Circular Economy Statement (see Part C of Policy CC3).	For clarity – to respond to comments from Unite (Responder ID 618)
MM96	Policy CC4 Minimising Carbon Emissions		Propose the following modification to Policy CC4 Part B - ...major development or and all development proposing substantial demolition to submit a Whole Life Cycle Carbon (WLC) emissions assessment.	For clarity – to respond to comments from Unite (Responder ID 618)
MM97	Policy CC4 Minimising carbon emissions		Propose to insert a new Part to Policy CC4, following Part B – <u>C. All major development will be required to submit a post construction Whole Life Cycle Carbon Assessment in line with London Plan Guidance on Whole Life Carbon Assessments.</u>	To align with London Plan Guidance on Whole Life Carbon Assessment - to respond to comments from Unite (Responder ID 618)
MM98	Policy CC4 Minimising carbon emissions	8.52	Propose to insert the following text at the end of paragraph 8.52 – <u>Where the Council considers an applicant has not fully assessed the whole life carbon of a proposal, an independent review of the Whole Life Cycle Carbon Assessment will be requested, to be paid for by the developer. The recommendations of the assessment should be implemented where feasible.</u>	To provide further information - to respond to comments from Hilson Moran (Responder ID 507)
MM99	Policy CC6 Energy use and the generation of renewable energy		Propose the following modification to Policy CC6 Parts A.2 and A.3 –	To correct a typographical error in A.2 and to update A.3 to respond to the additional viability testing of draft policy CC6 (ED67) and the response from Unite

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			2. be designed to use as little energy as possible to heat them. Developers <u>Development</u> should achieve a space heating demand of 20 or less kWh/m2 GIA/yr (kilowatt hour per square metre of gross internal area per year); 3. minimise total energy use. For each of the building types set out below (or the nearest equivalent), the Council will expect development to meet the Energy Use Intensity targets set out below, unless it is demonstrated to the Council's satisfaction that it is not feasible: a. residential buildings - 35 kWh/m2 GIA/yr; b. offices, Retail, Higher Education Teaching facilities, GP surgeries - 70 kWh/m2 GIA/year; c. student accommodation, care homes, extra care homes – 35-62 kWh/m2 GIA/year; <u>d. care homes – 124 kWh/m2 GIA/yr;</u> de. hotels - 160 kWh/m2 GIA/year; ef. light industrial units - 35 kWh/m2 GIA/year; and fg. schools - 65 kWh/m2 GIA/year.	to the Inspector's Matters Issues and Questions (ED54).
MM100	Policy CC6 – Energy use and the generation of renewable energy	8.90	Propose the following modification to paragraph 8.90 - Developments covered by Part A and Part C of Policy CC6 will be required to submit an Energy Statement to demonstrate to the Council's satisfaction that energy savings have been maximised through energy efficient design, low carbon heat, and the generation of renewable energy on-site.	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM101	Policy CC8 Overheating and cooling	8.113	Propose the following modification to paragraph 8.113 – Other measures that could be used to reduce the overheating risk in buildings and the spaces around buildings include: - controlling solar gain (through window design – considering size, properties of the glass used, depth of window reveal, and window openings); <u>using materials with a high thermal mass to absorb and retain heat produced by the sun. These materials can be used to regulate indoor temperatures, especially to keep inside spaces cool during the day;</u> - shutters and blinds;...	To provide further information - to respond to comments from the Highgate Society (Responder ID 649)
MM102	Policy CC8 Overheating and cooling	8.113	Propose the following modification to the tenth bullet point of paragraph 8.113 – maximising green landscaping <u>and blue infrastructure, such as green and blue roofs and rain gardens</u> (see policies in the Natural Environment Chapter).	To provide further information - to respond to comments from Redington Frognal Neighbourhood Forum (Responder ID 251)
MM103	Policy CC9 Water efficiency		Propose the following modification to Policy CC9 Part A 2 – require all residential development 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), <u>or any higher standard that may be adopted</u>. Proposals will be strongly encouraged to reduce daily water use even further than this where possible;	For clarity – to respond to comments from Thames Water (Responder ID 409)
MM104	Policy CC9 Water efficiency	8.124	Propose the following modification to paragraph 8.124 to insert the following text after the fifth bullet point – <u>The Council will expect developers to demonstrate that they have taken a fittings-based approach to comply with the optional requirement for water efficiency in Part G of the Building Regulations, as set out in Table 2.2 of the Regulations.</u>	For clarity – to respond to comments from Thames Water (Responder ID 409)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM105	Policy CC11 Sustainable drainage		Propose the following modification to Policy CC11 Part E – In the Counters Creek catchment area (shown on the Planning Policies Map) applications for basement development, and other development vulnerable to flooding in areas identified at risk of flooding, should seek to reduce surface water run-off rates to be as close to go beyond the greenfield run-off rate <u>as where</u> feasible.	For clarity – to respond to comments from Thames Water (Responder ID 409) and Redington Frognaal Neighbourhood Forum (Responder ID 251)
MM106	Policy CC11 Sustainable drainage	8.162	Propose the following modification to paragraph 8.162 – Applications for basement development and other development vulnerable to flooding in areas identified at risk of flooding in the Counters Creek catchment area, should therefore seek to reduce surface water run-off rates to be as close to go beyond the greenfield run-off rate <u>as where</u> feasible.	For clarity – to respond to comments from Thames Water (Responder ID 409)
MM107	Policy IE2 Offices		Propose the following modification to Policy IE2 Part C – The loss of offices in the borough will only be considered acceptable where a comprehensive and sustained marketing campaign has been undertaken for at least 12 months, which uses a variety of agents <u>which uses at least one recognised agent with appropriate and relevant expertise</u> and is based on a realistic rent.	To provide greater flexibility – in response to Q8 in Matter 5 of the Inspector's Matters, Issues and Questions
MM108	Policy IE2 Offices		Propose the following modification to Policy IE2 Part C – The marketing evidence should <u>robustly</u> demonstrate that suitable economic uses have been fully explored and evidenced to the Council's satisfaction , with consideration given to the feasibility and viability of the following:...	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM109	Policy IE2 Offices	9.36	Propose the following modification to Paragraph 9.36 – The Council has an established process for dealing with situations where offices become obsolete. In such cases, we will expect the provision of marketing evidence to show that there is no potential interest from occupiers and that marketing has been undertaken 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 one-agents with knowledge of local property markets <u>and a track record in the sale and letting of offices.</u>	To provide greater flexibility – in response to Q8 in Matter 5 of the Inspector's Matters, Issues and Questions
MM110	Policy IE2 Offices	9.37	Propose to delete paragraph 9.37 and replace it with the text below – As stated, significant elements of the office market continue to perform well in Camden and far greater emphasis is being placed on 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 to maintain jobs and facilitate future economic growth. Some neighbourhood plans and the London Plan seek to protect small office capacity in centres. Developers may therefore be asked to provide viability evidence to show that the refurbishment of a building to enable its continuing office use is not possible. This is particularly the case where premises appear to require relatively small scale interventions such as improved accessibility or renewed fittings (lighting, cabling for broadband etc.). <u>As part of the marketing exercise the Council will expect applicants to explore whether:</u> <u>the premises could be refurbished or modernised to enhance its attractiveness to potential occupiers. The marketing report should provide evidence to demonstrate that</u>	To respond to actions 17 and 19 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>the applicant has fully explored the option of refurbishing and modernising the premises. Where this option has been discounted, a robust justification should be provided in the report to explain why it is not feasible. Where the Council considers that the evidence provided is not relevant and robust, applicants may be asked to provide viability evidence to show that the refurbishment of a building to enable its continuing office use is not possible. This is particularly the case where premises appear to require relatively small-scale interventions such as improved accessibility or renewed fittings (lighting, cabling for broadband etc.);</u> <u>discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements could be used to increase market interest. The marketing report submitted to the Council should detail the steps taken to secure target occupiers over the 12 month period;</u> <u>the premises could be re-configured to meet the demands of growth sectors and smaller businesses, including studios, start-ups and micro businesses. The marketing report should set out why any identified deficiencies in the premises are limiting market demand and demonstrate that the applicant has fully explored the feasibility of these being overcome through refurbishment and/or works to the premises. This evidence should relate to the specific characteristics and constraints of the individual property, including heritage significance, rather than relying on wider market trends.</u> <u>Where there is a proposal for an alternative employment use that would provide benefits for small and medium-sized enterprises in terms of access to affordable or low cost workspace, the Council will apply the approach to marketing and viability evidence flexibly, subject to other relevant Local Plan policies.</u>	
MM111	Policy IE2 Offices	9.39	Propose the following modification to paragraph 9.39 - Where office buildings become redundant the Council's preferred alternative use is housing. We will also support the conversion of offices to student accommodation <u>and the reuse of office buildings for education use in the Bloomsbury Campus Area</u>. The ability to deliver...	To respond to action 16 in ED89 Actions and Modifications Table
MM112	Policy IE2 Offices	9.40	Propose to insert the following text as a new paragraph, after paragraph 9.40 – <u>There are a number of large cultural, educational and health institutions in the borough, particularly within the Central Activities Zone where office and administrative space form part of their estate. Some of these bodies have estate plans identifying the potential need to change the use of different buildings over time to meet changing priorities and demands. Where the proposed development is publicly funded or otherwise serves an acknowledged public purpose, we will consider reducing the period of the marketing exercise or waiving this requirement, provided the space will continue to be used by the institution to deliver its offer. This does not remove the Council's requirement for such schemes to make a financial contribution towards the loss of employment space.</u> Renumber subsequent paragraphs.	To provide further information on our approach – in response to comments from the British Museum (Responder ID 594)
MM113	Policy IE3 Industry	9.49	Propose the following modification to paragraph 9.49 - It is therefore assumed that other than the sites allocated for intensification or development in the Local Plan, the vast majority of the remaining stock of non-allocated industrial sites serve a valuable economic function and therefore, will continue to have an important role in contributing to local economic need. <u>The Council recognises that there are other uses that may be similar to 'traditional' B2 and B8 industrial land uses, such as sui generis uses of a similar nature and light industrial activities in use Class E. Subject to other relevant Local Plan policies, the Council will support proposals for the location of such uses on non-designated industrial land, particularly where this involves local growth sectors, such as the creative industries, improves access to affordable or low cost workspace for small and medium-sized enterprises, and would not be prejudicial to maintaining the borough's</u>	To respond to action 20 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>industrial capacity over the long-term. Given this, other</u> land uses (including offices) will generally be resisted on these sites except where thorough evidence has been presented to show that the potential for the site to remain in industrial <u>or similar use</u> is low. Applicants will therefore be expected to provide marketing evidence in line with the approach for offices in Part C of Policy IE2 and demonstrate through viability evidence why there is no realistic option for retaining an industrial <u>or similar use</u> , including, where relevant, through the upgrading and refurbishment of premises. Any viability assessment should be prepared with input from agents with specialist knowledge of industrial land markets.	
MM114	Policy IE4 Affordable Workspace		Propose the following modification to Policy IE4 Part A.2 – The Council will: seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years, <u>subject to viability</u> ; and	For clarity
MM115	Policy IE5 Hotels and visitor accommodation		Propose the following modification to Policy IE5 Part B.2 – support smaller and medium-sized hotels (<u>less than 2,500sqm GIA</u>) and visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road / Swiss Cottage and in locations with an established commercial or mixed-use character in the Central Activities Zone;	For clarity – in response to Q23 in Matter 5 of the Inspector's Matters, Issues and Questions
MM116	Policy IE9 Delivery-led Food Businesses	9.130	Propose the following modification to paragraph 9.130 – These are generally internet-based services and are popular due to their convenience and rapid delivery times. <u>This policy does not apply to 'production kitchens', which prepare food to be consumed in restaurants.</u>	To respond to action 23 in ED89 Actions and Modifications Table
MM117	Policy SC1 Improving health and wellbeing	10.13	Propose the following modification to paragraph 10.13 - Health Impact Assessments will also be required for non-major applications considered to have the potential to give rise to significant adverse health impacts, <u>for example hot food take aways, delivery-led food businesses and betting shops</u> , and for non-major developments involving sensitive uses such as education, health, leisure or community facilities, <u>and</u> publicly accessible open space, <u>hot food take aways, betting shops</u> and in areas where air pollution and noise issues are particularly prevalent.	To respond to action 24 in ED89 Actions and Modifications Table
MM118	Policy SC5 Food growing		Propose the following modification to Policy SC5 Part A (2) - seek to secure the on-site provision of suitable space for food growing by residents as part of all major housing developments and mixed use developments incorporating housing. Where provision cannot be made on-site, a financial contribution will be sought to deliver off-site community food growing projects. <u>This contribution will form part of the overall open space requirement generated by the development under Policy SC4 (Open Space).</u>	To respond to action 26 in ED89 Actions and Modifications Table
MM119	Policy SC6 Cultural facilities		Propose the following modification to Policy SC6 Cultural facilities Part D – Where a proposal includes a new or relocated cultural facilities, or additional floorspace, the Council will <u>expect require</u> the applicant to provide the following, <u>where appropriate</u> :	For clarity - in response to comments from the British Museum (Responder ID 594)
MM120	Policy SC6 Cultural facilities	10.103	Propose to insert a new paragraph following paragraph 10.103 - <u>In order to assess the impact of a proposal for a new or relocated cultural facility or additional floorspace, the Council will expect the applicant to provide evidence in line with Part D of Policy SC6. The Council recognises however that the level of evidence required to make a</u>	For clarity – in response to Q14 in Matter 6 of the Inspector's Matters, Issues and Questions

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>robust assessment will vary dependant on the nature and scale of the proposal, with a greater level of evidence required to support a proposal for a new cultural facility, compared to the delivery of additional floorspace at an existing cultural facility. Given this, the Council will encourage applicants to take a proportionate approach when providing evidence in accordance with Part D of Policy SC6.</u> Renumber subsequent paragraphs.	
MM121	Policy NE2 Biodiversity		Propose the following modification to Policy NE2 Part A.5 – expect suitable developments to integrate measures to support wildlife, including swift bricks, bat/bird boxes, bee bricks and permeable fencing <u>garden borders, such as hedges</u> .	For clarity - to respond to comments from Redington Frognal Neighbourhood Forum (Responder ID 251)
MM122	Policy NE2 Biodiversity	11.40	Propose the following modification to paragraph 11.40 – As a benchmark, <u>at least</u> 50% of total planting should be native species and <u>at least</u> 50% species...	For clarity – to respond to comments from the Highgate Society (Responder ID 649)
MM123	NE3 Tree Planting and Protection	11.57	Propose the following modification to paragraph 11.57 – These measures should be agreed with the Council prior to commencement and implemented <u>in accordance with the agreed plans and strategy to the Council's satisfaction</u> .	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM124	Policy D1 Achieving design excellence		Propose the following modification to Policy D1 Part A – All development in Camden must achieve excellence in the architecture and design of buildings and places, responding to the climate <u>and ecological</u> emergency, improving the health and well-being of our communities, and celebrating Camden's diversity of people and place.	For clarity - to respond to comments from Redington Frognal Neighbourhood Forum (Responder ID 251)
MM125	Policy D1 Achieving Design Excellence		Propose the following modification to criterion B4 of Policy D1 - respect <u>consider</u> local views and preserve protected strategic views	For consistency – in response to Q10 in Matter 7 of the Inspector's Matters, Issues and Questions
MM126	Policy D2 Tall buildings		Propose the following modification to Policy D2 Part C.8 – the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets <u>(including in neighbouring boroughs where impacted)</u> in accordance with Policy D5 (Historic Environment).	To respond to comments made by LB Islington (Responder ID 606)
MM127	Policy D2 Tall buildings	12.31	Propose the following modification to paragraph 12.31 – A list of the sites shown on Figure 22 is set out in Table 12 above. The locations shown on Figure 22 and listed in Table 12 have been informed by the Camden Building Heights Study. Guidance on building heights for specific sites is set out in relevant site allocation policies. <u>Applications for tall buildings at locations not identified on Figure 22 or listed in Table 12 will also be considered against Policy D2 and other relevant policies.</u>	To respond to action 27 in ED89 Actions and Modifications Table
MM128	Policy D6 Basements		Propose the following modification to Policy D6 Part A.1 – neighbouring properties <u>and infrastructure</u> .	For clarity – to respond to comments from TfL (responder ID 604)

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM129	Policy D6 Basements		Propose the following modifications to Policy D6 Part C – 3. Not exceed the footprint of the host building in area, except for works to create a lightwell or access to the basement <u>50% of each garden within the property;</u> 4. be set back from neighbouring property boundaries where a new access or lightwell is being created; and 4. be less than 1.5 times the footprint of the host building in area; 5. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation; 6. not extend into or underneath the garden further than 50% of the depth of the garden; 7. 5. avoid the loss of garden space or trees of townscape or amenity value from construction work or due to the creation of a new access or lightwell.	To respond to action 30 in ED89 Actions and Modifications Table
MM130	Policy D6 Basements		Propose the following modifications to Policy D6 Part D – Exemptions to C(1) to C(57) above may be made on large comprehensively planned sites.	To respond to action 30 in ED89 Actions and Modifications Table
MM131	Policy D6 Basements		Propose the following modifications to Policy D6 Part E – 8. Ensure impacts on any green/garden space or trees are minimised and where residual impacts do arise this is addressed through appropriate restoration and replacement, <u>in accordance with Policy NE2 (Biodiversity)</u> prioritising biodiversity enhancements where possible. <u>9. take opportunities to increase natural soft landscaping and tree planting through a landscaping or planting plan, with biodiversity measures incorporated to improve the character, amenity and function of the garden.</u>	To respond to action 30 in ED89 Actions and Modifications Table
MM132	Policy D6 Basements	12.131	Propose the following modification to paragraph 12.131 – In addition to protecting against flooding, ground instability and damage to neighbouring buildings as set out above, the Council will 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. Basements should not comprise more than one storey. The Council considers a single storey for a basement to be approximately 3 to 4 metres in height. We will allow a proportion of the basement to be deeper to allow development of swimming pools.	To respond to action 30 in ED89 Actions and Modifications Table
MM133	Policy D6 Basements	New paragraph to follow Para 12.131 (new 12.132)	Propose to insert the following new paragraph after 12.131 - <u>12.132 Criterion C(3) states that basements should not exceed 50% of each garden within the property. This criterion applies to the front garden, the rear garden and gardens to the side of the property individually, rather than calculated as an aggregated garden area for the whole property. This criterion applies to gardens as they currently exist and not the gardens of the proposed development. The unaffected garden must be in a single area and where relevant should form a continuous area with other neighbouring gardens.</u> Renumber subsequent paragraphs.	To respond to action 30 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
MM134	Policy D6 Basements	New paragraph to follow Para 12.132 above (new 12.133)	Propose to insert the following new paragraph after new paragraph 12.132 proposed in MM146 above - <u>12.133 Applicants should have regard to the overall strategic approach to the natural environment and biodiversity in Chapter 11 of the Local Plan. In particular, developers should realise benefits for biodiversity through increasing soft natural landscaping and planting of high biodiversity value. The Council will use planning conditions to secure landscaping and planting plans to ensure proposals respond positively and sensitively to local context and character, address opportunities to increase local biodiversity and achieve design excellence. Adopted Neighbourhood Plans in the borough set out measures for facilitating a more resilient natural environment, such as strengthened wildlife corridors, which should be given due regard. A baseline ecological assessment (Biodiversity survey and report) may also be required in line with Policy NE2 to ensure that any adverse impacts on biodiversity are avoided or mitigated, and establish how the natural value of the site can be improved against the baseline condition.</u> Renumber subsequent paragraphs.	To respond to action 30 in ED89 Actions and Modifications Table
MM135	Policy D6 Basements	12.132	Propose the following modification to existing paragraph 12.132 – Works involving the creation of lightwells or access to a basement should be modest in scale and must be designed to minimise impacts on existing garden space and trees as set out in paragraph 12.139 below. Sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees.	To respond to action 30 in ED89 Actions and Modifications Table
MM136	Policy D6 Basements	12.139	Propose the following modification to paragraph 12.139 – 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 retaining and protecting trees. Camden has a sizeable number of large residential properties where basement construction can have a significant impact on the biodiversity of a garden and its ground conditions. Where the excavation of a garden would lead to the loss of established planting, it is important that this is mitigated. Large gardens are considered to be especially important for urban biodiversity as they have the ability to support a greater variety of planting, including larger tree and shrub species, and can make a positive contribution to an area's verdant character. They also have particular scope for establishing areas of natural planting, to provide habitat for wildlife and sustain populations of invertebrates. Cumulatively, gardens can have a significant role in providing infiltration during rainfall events and contribute towards climate change mitigation. [Start new paragraph] <u>12.x The Council expects B</u>basement development should to be planned to minimise disturbance to gardens, <u>biodiversity and</u> or trees, including root systems, in accordance with Policies NE2 (Biodiversity) and NE3 (Tree Protection and Planting). This includes trees located in the street. Large canopy trees are of particular importance. Further information on protection of trees is available in Camden Planning Guidance on Trees and developers will be expected to have due regard to this. Where re-instatement / restoration of a garden is necessary, we will seek improvements in its biodiversity value and expect the provision of soft landscaping. Applicants should prepare an ecological assessment to deliver biodiversity enhancement measures within the garden, proportionate to the size of scheme. Where the	To respond to action 30 in ED89 Actions and Modifications Table

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			<u>existing biodiversity value is identified as low, developers should seek to deliver net gains in site biodiversity through measures such as native wild planting and additional semi-mature trees. This approach is also likely to realise wider beneficial outcomes, such as improved management of surface run-off.</u> Renumber subsequent paragraphs.	
MM137	Policy D6 Basements	12.143 and 12.144	Propose to add the following text to the end of paragraph 12.143 “<u>Excessively large lightwells will be resisted.</u>” and delete paragraph 12.144 – Lightwells to the side or rear of a property should be set away from the boundary of a neighbouring property. Renumber subsequent paragraphs.	To respond to action 30 in ED89 Actions and Modifications Table
MM138	Policy A1 Protecting Amenity	13.30	Propose the following modification to paragraph 13.30 – 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 <u>and robust</u> assessments and take appropriate remedial action to the Council's satisfaction if required.	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM139	Policy A3 Air quality	13.67	Propose to insert the following text at the end of paragraph 13.67 – <u>If the AQA includes an assessment of laboratory flues, or consideration of other emissions which need specialist consideration, then the Council will seek independent verification of the assessment, to be paid for by the developer.</u>	For clarity
MM140	Policy T1 Safe, healthy and sustainable transport		Propose the following modification to Policy T1 Part A (6) - not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure projects, <u>including, but not limited to, High Speed 2 and Crossrail 2.</u>	To respond to action 95 in ED89 Actions and Modifications Table
MM141	Policy T2 Prioritising walking, wheeling, and cycling		Propose the following modification to Policy T2 Part C (2) – require development to provide for high quality, accessible, inclusive, convenient, and safe cycle parking facilities, <u>in line with or</u> exceeding the minimum standards outlined in the London Plan, and design requirements outlined within Camden Planning Guidance on Transport. Higher levels of provision will be <u>encouraged expected</u> in areas well served by cycle route infrastructure, taking into account the size and location of the development;	To respond to action 96 in ED89 Actions and Modifications Table
MM142	Policy T6 Sustainable movement of goods, services, and materials		Propose the following modification to Policy T6 Part 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.	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM143		2.8	Propose the following modification to paragraph 2.8 – It should however be noted that the imminent current review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the	To respond to the action in the Inspector's Post Hearings Letter ED102 to introduce a policy requirement

Reference	Policy	Paragraph	Proposed Modification	Reason for Modification
			target that is in this the new Local Plan. The Mayor of London is GLA are aiming to adopt the new London Plan in early 2028 2027/28 , so this may mean that Camden's new Local Plan housing target is only in place for a short period of time. <u>As a result the Council propose to start work on the preparation of a new Local Plan following the adoption of the new London Plan or five years from the adoption of this Local Plan, whichever is sooner (see Policy DM1 Delivery, monitoring and review).</u>	requiring an early review of the Local Plan
MM144		15.2	Propose the following modification to paragraph 15.2 – It focuses 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); and • monitor the delivery of the Local Plan; and <u>take forward a review of the Local Plan in the future.</u>	To respond to the action in the Inspector's Post Hearings Letter ED102 to introduce a policy requirement requiring an early review of the Local Plan
MM145	Policy DM1 Delivery and Monitoring		Propose the following modification to Policy DM1 to insert a new Part into the policy, following Part A – <u>B. The Council will start work on the preparation of a new Local Plan either following the adoption of the new London Plan or five years from the adoption of this Local Plan, whichever is sooner.</u>	To respond to the action in the Inspector's Post Hearings Letter ED102 to introduce a policy requirement requiring an early review of the Local Plan
MM146		Following 15.39	Propose to insert a new sub section into the Plan following paragraph 15.39 – <u>Review of the Local Plan</u> <u>The Council will start work on the preparation of a new Local Plan either following the adoption of the new London Plan (expected in early 2028) or five years from the date of adoption of this Local Plan, whichever is sooner.</u> <u>As part of the preparation of the next Local Plan the Council will review the Borough's housing requirement, housing land supply position, housing delivery assumptions and the effectiveness of the Plan strategy in meeting identified housing needs, having regard to national policy and any changes arising from the new London Plan.</u>	To respond to the action in the Inspector's Post Hearings Letter ED102 to introduce a policy requirement requiring an early review of the Local Plan
MM147			Propose to replace the Local Plan Monitoring Framework set out in SD15 with the updated Monitoring Framework set out in ED98. Propose to incorporate the Monitoring Framework set out in ED98 into the Plan as Appendix 5 (see below).	To respond to the action in the Inspector's Post Hearings Letter ED90 to review and update the monitoring indicators set out in SD15.
MM148			Propose to incorporate the housing land supply trajectory set out in ED99 Housing Land Supply Table into the Plan as Appendix 6 (see below).	To respond to the action in the Inspector's Post Hearings Letter ED90 to review and update the housing trajectory.

Local Plan Monitoring Framework

Responding to the climate emergency

Strategic objective: To ensure that development in Camden responds to the climate emergency by delivering zero carbon development, reducing energy use in existing buildings, 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.

Contextual indicators

- Changes in the levels of nitrogen dioxide and particulate matter PM2.5 and PM10 in Camden.
- Record the number of streets on the Council's previously flooded streets register that have flooded again and any new streets that have been added to the register.
- The number of borough heat alerts.

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
CC2 Prioritising the retention of existing buildings	To prioritise the retention and improvement of existing buildings over demolition.	No relevant baseline available	Record annually the number of planning applications where substantial demolition has been approved.	All applications approved which propose substantial demolition meet the policy requirements in Policy CC2 Part C.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
CC3 Circular economy and reduction of waste	To ensure that developments minimise waste and use resources efficiently.	No relevant baseline available	Record annually the percentage of material by volume and weight on approved major development schemes which is sourced from new materials, reused materials and recycled materials.	All major applications approved minimise waste and use resources efficiently in line with the waste hierarchy in Policy CC3 Part B.1.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
CC4 Minimising carbon emissions	To ensure whole life cycle carbon emissions are minimised over the lifespan of a building and that embodied carbon is actively reduced in development.	No relevant baseline available	Record annually the number of major planning applications approved that meet London Plan aspirational benchmarks or minimum benchmarks for whole life carbon.	More major applications are approved that meet the London Plan aspirational benchmarks than the minimum benchmarks for whole life carbon.	More developments are approved over a three year period that meet the London Plan minimum benchmarks rather than the aspirational benchmarks for whole life carbon.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
CC6 Energy use and the generation of renewable energy	To ensure that development in the borough uses less energy and maximises the generation of renewable energy.	No relevant baseline available	Record annually the number of planning applications approved for new buildings / developments where some existing fabric is retained that achieve net zero carbon in operation.	All planning applications approved for new buildings / developments where some existing fabric is retained either achieve an energy balance of net zero carbon in operation or make a financial contribution to offset the shortfall between the predicted annual energy use and annual renewable energy generation in line with Policy CC6 Part A.4.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
		No relevant baseline available	Record annually the number of planning applications approved for non-residential development that provide 500sqm or more of additional or reprovided floorspace that achieve a minimum of 'Excellent' in BREEAM non-domestic refurbishment.	All planning applications approved for non-residential development that provide 500sqm or more of additional or reprovided floorspace achieve BREEAM Excellent in line with Policy CC6 Part D.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
CC11 Sustainable drainage	To reduce surface water run-off and improve drainage to reduce the risk of flooding.	No relevant baseline available	Record annually the number of major planning applications approved that achieve a greenfield run-off rate.	All major planning applications approved achieve a greenfield run-off rate in line with Policy CC11 Part C.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Meeting housing needs

Strategic objective: 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.

Contextual indicators

- Average house prices in Camden.
- Housing affordability in Camden (based on the ONS affordable housing ratio which uses data on house prices and annual earnings to calculate affordability ratios for different areas).
- Number of households in temporary accommodation.
- Number of households on the housing waiting list.
- Percentage of houses that are overcrowded.

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
Site allocation policies	To support the delivery of new homes, jobs and infrastructure in Camden.	The planning status of the site allocations as identified in the Local Plan housing trajectory.	Record annually: • The planning status of each site allocation. • Whether development is not started, under construction or complete. • The number of homes that are not started, under construction or complete.	The delivery of the site allocations is in line with the Local Plan housing trajectory.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Review and update the housing trajectory. Report the outcome of this exercise in the AMR.
H1 Maximising housing supply	To maximise housing supply in Camden to help meet the needs of existing and future households.	Existing housing stock	Record annually the total number of new homes approved, not started, under construction and completed (net) for both self-contained and non-self-contained housing.	Completion of 1,038 homes for the first three years of the Plan period and 703 homes thereafter.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR. Review and update the Council's Housing Delivery Test Action Plan.
H2 Maximising the supply of self-contained housing from mixed-use schemes	To support the provision of permanent self-contained housing as part of a mix of uses in "defined areas of high public transport accessibility".	No relevant baseline available	Record annually the number of new homes secured either on-site or off-site, or the level of financial contribution secured, through the application of Policy H2.	All developments that provide additional non-residential floorspace and involve the provision of additional floorspace of 200 sqm (GIA) contribute	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
				to self-contained housing in line with Policy H2.		outcome of this exercise in the AMR.
H4 Maximising the supply of affordable housing	To maximise the supply of affordable housing to meet the needs of households unable to access market housing.	Existing stock of social rented housing / number of households in affordable rented housing	Record annually the total number of new affordable homes approved, not started, under construction and completed (net) and the financial contributions secured through section 106 towards the delivery of affordable housing in Camden.	Completion of 200 affordable homes per year.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
H7 Large and small homes	To secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities.	Existing household size	Record annually the percentage mix of home sizes completed by tenure.	Schemes include a mix of large homes and small homes and contribute to meeting the dwelling size priorities in Table 9 of the Local Plan.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
H8 Housing for older people, homeless people and other people with care or support requirements	To support the provision of housing that meets the needs of older people, homeless people and other people with care or support requirements in Camden.	Existing care home and hostel provision.	Record annually the number of care homes and hostels approved and completed (net) in terms of bedrooms.	The delivery of non-self contained homes counts towards meeting Camden's housing target. This indicator will therefore count towards meeting the policy target set for Policy H1 above.	n/a see policy triggers for Policy H1 above	n/a see actions for Policy H1 above
H9 Purpose-built student accommodation	To ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds.	Existing number of student places (bedrooms).	Record annually the number of student places approved and completed (net) as part of student housing developments.	Completion of 200 additional student places in student housing per year.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
H10 Housing with shared facilities (including large-scale purpose-built shared living)	To ensure that there is continued provision of housing with shared facilities to meet the needs of small households in Camden.	Number of licenced houses in multiple occupation in Camden / number of households in private rented accommodation	Record annually the number of homes in multiple occupation approved and completed (net) and the number of large scale purpose built	The delivery of non-self contained homes counts towards meeting Camden's housing target. This indicator will therefore count towards	n/a see policy triggers for Policy H1 above	n/a see actions for Policy H1 above

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
			shared living schemes approved and completed (net).	meeting the policy target set for Policy H1 above.		
H11 Accommodation for Travellers	To protect existing traveller sites and support the provision of new sites to help meet the accommodation needs of Camden's established Traveller community.	Number of existing Gypsy and Traveller pitches and Travelling Showpeople plots in Camden.	Record annually the number of new Gypsy and Traveller pitches approved and completed.	To deliver 13 additional Gypsy and Traveller pitches by 2035/36.	The policy target is not met.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Consider holding a call for sites. Report the outcome of this exercise in the AMR.

Supporting communities

Strategic objective: To make sure that development meets the needs of Camden's diverse communities and enables safe, strong, inclusive, 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.

Contextual indicators

- Camden population by age and ethnicity.
- Camden's position in the index of multiple deprivation relative to other local authorities in London and England and changes to this over time.
- The crime rate in Camden compared to other London boroughs.
- Level of reported happiness.
- Number of residents with a long term health condition or disability that limits their day-to-day-activities in some way.

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
SC3 Social and Community Infrastructure	To protect existing and support the provision of new or improved social and community infrastructure.	The existing provision of community facilities in Camden	Record annually the net change in the provision of community facilities through planning permissions	No net loss of community facilities.	A cumulative net loss of community facilities over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
SC6 Cultural facilities	To protect existing cultural facilities and support the provision of new or expanded cultural facilities.	The existing provision of cultural facilities in Camden	Record annually the net change in the provision of cultural facilities through planning permissions	No net loss of cultural facilities.	A cumulative net loss of cultural facilities over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
SC7 Public houses	To protect public houses which are of community, heritage or townscape value.	No relevant baseline available	Record annually the net change in the provision of public houses which are of community, heritage or townscape value through planning permissions.	No net loss of public houses of community, heritage or townscape value.	A cumulative net loss of public houses over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
A2 Safety and security	To create a safer borough for all.	No relevant baseline available	Record annually the number of major applications that include a Crime Impact Assessment.	All major applications to include a Crime Impact Assessment.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Employment and the economy

Strategic objective – To strengthen Camden’s nationally important economy and maximise opportunities for Camden’s 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

Contextual indicators

- The number of jobs in Camden.
- The employment rate and level of unemployment in Camden.
- The number of registered businesses in Camden and the proportion of businesses per industry sector.
- The number of 16 – 17 year olds not in education, employment or training.

Policy	Policy Purpose	Baseline	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
IE1 Growing a successful and inclusive economy	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.	Existing employment capacity in Camden	Record annually the amount of employment floorspace approved, not started, under construction and complete (net)	A net gain in employment floorspace secured through planning permissions	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
		No relevant baseline available	Record annually the number of apprenticeship places and training schemes secured through planning permissions.	All employment schemes meet the requirements of Policy IE1 Part A.5.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
IE4 Affordable workspace	To increase the supply of affordable workspace in Camden.	No relevant baseline available	Record annually the number of schemes approved and completed that include the provision of affordable workspace; the amount of affordable workspace provided (either on-site or off-site); and the total financial	All major schemes permitted 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)) contribute to the delivery of affordable workspace.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Policy	Policy Purpose	Baseline	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
			contributions secured in lieu of provision.			
S3 Hatton Garden Jewellery Industry Area	To support the historic jewellery trade in Hatton Garden	The number of jewellery businesses in Hatton Garden	Record annually the net change in jewellery workshop floorspace in the Hatton Garden area both in terms of floorspace approved and floorspace completed	A net increase in jewellery workshop floorspace in the Hatton Garden area	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
		No relevant baseline available	Record annually the number of schemes approved and completed that include the provision of affordable jewellery workspace; the amount of affordable jewellery floorspace provided (either on-site or off-site); and the total financial contributions secured in lieu provision.	All proposals in Hatton Garden that increase the total gross internal area by more than 200sqm provide affordable premises for jewellery-related uses.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Town centres and retail

Strategic objective – To ensure our designated centres are accessible and sustainable, to enhance their unique character and support their varied roles as centres of trade, community activity, creativity, business, tourism and learning

Contextual indicators

- Vacancy rates by designated centre.
- The proportion of retail, food and drink and other services by designated centre.
- Annual High Street footfall.
- Annual High Street spend.

Policy	Policy Purpose	Baseline	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
IE6 Supporting designated centres and essential services	To maintain successful and vibrant centres throughout the borough and ensure a balanced range of uses is provided to meet the needs of residents, workers and visitors	Existing retail capacity in Camden	Record annually the amount of retail floorspace approved and completed (net)	A net gain in retail floorspace secured through planning permissions	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
IE7 Hot food takeaways	To manage the delivery of new hot food takeaways in certain locations and circumstances	Number of hot food takeaways recorded in designated centres in the 2026 retail survey	Record annually the number of additional hot food takeaways approved	No new hot food takeaways to be approved within a 400 metre walking distance of a school / sensitive use or where they would increase the total number of hot food takeaways within a designated centre, above the current Camden Retail Survey baseline.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
IE8 Gambling uses	To manage the delivery of new gambling related uses in certain locations and circumstances	Number of gambling uses recorded in designated centres in the 2026 retail survey	Record annually the number of gambling uses approved	No new gambling uses to be approved within a 400 metre walking distance of a school / sensitive use or within the centres set	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what

Policy	Policy Purpose	Baseline	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
				out in Policy IE8 Part A.1 where they would increase the total number of gambling uses within a designated centre, above the current Camden Retail Survey baseline.		action to take. Report the outcome of this exercise in the AMR.
IE9 Delivery-led food businesses	To ensure that the impact of delivery-led food businesses is effectively managed.	No relevant baseline available	Record annually the number of delivery-led food businesses approved	No target	n/a	n/a

Design

Strategic objective – To promote high quality, inclusive and sustainably designed development which protects resident’s amenity, respects and conserves the unique character and history of Camden’s neighbourhoods, celebrates and reflects the diversity of Camden’s communities, and enables families to remain in the borough and thrive.

Contextual indicators

- Existing character (in terms of building typologies) and building heights in Camden.
- Number of buildings on Historic England’s heritage at risk register.
- Number of schemes in Camden winning national and local design awards.

Policy	Policy Purpose	Baseline	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
D2 Tall buildings	To define what a ‘tall building’ is for specific localities; identify locations where tall buildings may be an appropriate form of development in Camden, subject to meeting the other requirements of the Plan; and set out criteria to guide the determination of applications for tall buildings in the borough.	See contextual indicators above	Record annually the number of tall building applications approved; the height of tall buildings permitted; and whether or not the tall building approved is on a site identified for tall buildings in the Local Plan.	n/a	n/a	n/a
D3 Design of housing	To ensure that new homes are designed to be flexible, adaptable and meet the needs of all Camden’s residents	No relevant baseline available	Record annually the number of new-build self-contained homes approved in new developments that are accessible and adaptable in accordance with Building Regulation M4(2) and the number of new-build self-contained homes approved in new developments that are wheelchair user dwellings in accordance with	90% of new-build self-contained homes in new developments are accessible and adaptable in accordance with Building Regulation M4(2) and 10% of new-build self-contained homes in new developments are wheelchair user dwellings in accordance with Building Regulation M4(3).	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Policy	Policy Purpose	Baseline	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
			Building Regulation M4(3).			
D4 Extensions and alterations to existing buildings	To support applications for extensions and alterations to existing buildings to deliver additional residential floorspace and/or additional homes subject to a number of criteria.	No relevant baseline available	Record annually the number of additional homes provided through extensions or alterations to existing buildings.	The delivery of self-contained homes counts towards meeting Camden's housing target. This indicator will therefore count towards meeting the policy target set for Policy H1 above.	n/a see policy triggers for Policy H1 above	n/a see actions for Policy H1 above
D5 Historic environment	To conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings.	Number of existing nationally listed buildings and conservation areas in the borough	Record annually the number of designated heritage assets demolished / lost through planning permissions	No application for the loss of a heritage asset to be approved unless steps have been taken to ensure the new development will proceed after the loss has occurred.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
D6 Basements	To manage and support basement development in Camden and ensure any impacts are mitigated.	No relevant baseline available.	Record annually the number of residential basements approved and whether they were accompanied by a Basement Impact Assessment, Construction Management Plan and landscaping / planting plan.	All residential basements approved meet the requirements of Policy D6 Part B and Part E.9.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
A1 Protecting amenity	To ensure that standards of amenity are protected for all.	No relevant baseline available	Record annually the number of major applications that include a Construction Management Plan.	All major applications to include a Construction Management Plan.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Safe, Healthy and Sustainable Transport

Strategic objective: 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.

Contextual information

- Transport modal share in the borough.
- Level of car ownership in Camden.
- The number of healthy streets projects delivered.
- The provision of new or upgraded segregated cycle lanes (in km).
- The quantity of new Sustainable Drainage Systems delivered as part of highways schemes (in sqm).

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
T1 Safe, Healthy and Sustainable Transport	To prioritise the delivery of safe, active, healthy, affordable, and sustainable transport.	No relevant baseline available	Record annually the contributions secured through CIL and section 106 towards the delivery of highways projects in Camden.	All major developments contribute towards the delivery of highways projects in Camden in line with Policy T1 Part A.11.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
T2 Prioritising walking, wheeling, and cycling	To promote active travel by prioritising walking, wheeling, and cycling in the borough.	The number of cycle parking spaces in Camden.	Record annually the number of new cycle parking facilities secured through planning permissions which are provided on-site; and the total financial contributions to the provision of off-site facilities.	Net increase in the provision of cycle parking facilities.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
T3 Public transport	To safeguard and promote the provision of public transport in the borough.	No relevant baseline available.	Record annually the contributions secured through CIL and section 106 towards the delivery of public transport projects in Camden.	Applications contribute towards the delivery of public transport projects in Camden in line with Policy T3 Part B.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Policy	Policy purpose	Baseline	Policy indicator	Policy target	Triggers for action	Actions to inform need for policy review
T4 Shared transport infrastructure and services	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.	No relevant baseline available	Record annually the number of new cycle hire docking stations, e-bike and e-scooter hire bays, cargo bikes for hire, car club bays, and on-street EV charging points secured through planning permissions which are provided on-site; and the total financial contributions to the provision of off-site facilities.	Net increase in the provision of shared transport facilities secured through planning permissions.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Open space and the natural environment

Strategic objective – To improve access to parks and green spaces and enhance biodiversity, by protecting and enhancing existing assets and providing new green spaces and habitats

Contextual indicators

- Average distance to nearest park or greenspace
- The number of new trees planted by the Council
- Types of habitats in Camden (% of borough area)
- Number of wildlife species in Camden by group

Policy	Policy Purpose	Baseline	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
SC4 Open Space	To protect existing and support the provision of new or improved open space.	Existing areas of public open space in Camden	Record annually the net change in public open space provision	No net loss in public open space	A cumulative net loss in public open space provision over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
			Record annually open space funding secured in lieu of on-site provision	All applications which meet the thresholds set out in Table 11 of the Local Plan that are unable to deliver open space on-site make a financial contribution in lieu of provision in line with Policy SC4 Part C.3.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
NE2 Biodiversity	To ensure that development protects and enhances nature conservation and biodiversity in the borough.	Existing Sites of Importance for Nature Conservation (SINC) in Camden	Record annually the net change in Sites of Importance for Nature Conservation (in terms of area covered)	No net loss in Sites of Importance for Nature Conservation (in terms of area covered)	A cumulative net loss in Sites of Importance for Nature Conservation (in terms of area covered) over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Policy	Policy Purpose	Baseline	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
		No relevant baseline available	Record annually the number of eligible sites delivering a biodiversity net gain of at least 10% against the baseline	All eligible sites deliver a net gain in biodiversity in line with Policy NE2 Part A.6.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Health and wellbeing

Strategic objective – 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 and sports facilities

Contextual indicators

- Life expectancy at birth for males and females.
- Percentage of children living in poverty.
- Percentage of adults who are physically active.
- Obesity prevalence in children.

Policy	Policy Purpose	Baseline	Policy Indicator	Policy Target	Triggers for Action	Actions to inform need for policy review
SC1 Improving health and well-being	To support healthier communities and reduce health inequalities	No relevant baseline available	Record annually the number of major planning applications approved that include a Health Impact Assessment.	All major planning applications approved include a Health Impact Assessment in line with Policy SC1 Part C.	The policy target is not met over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
SC3 Social and Community Infrastructure	To protect existing and support the provision of new or improved social and community infrastructure.	Existing provision of indoor sports facilities in Camden.	Record annually the net change in indoor sports provision secured as part of new developments	No net loss in indoor sports provision through planning permissions.	A cumulative net loss in indoor sports provision over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
SC4 Open Space	To protect existing and support the provision of new or improved open space.	Existing provision of outdoor sport facilities in Camden.	Record annually the net change in outdoor sports provision secured as part of new developments	No net loss in outdoor sports provision through planning permissions.	A cumulative net loss in outdoor sports provision over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Policy	Policy Purpose	Baseline	Policy Indicator	Policy Target	Triggers for Action	Actions to inform need for policy review
		Existing provision of play facilities in Camden.	Record annually the net change in play provision secured as part of new developments	No net loss in play provision through planning permissions.	A cumulative net loss in play provision over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.
SC5 Food growing	To support household food growing and community food growing projects to ensure that residents have access to nutritious, affordable and sustainable food.	Existing provision of allotments and community food growing areas in Camden.	Record annually the net change in the number of allotments and community food growing areas secured as part of new developments	No net loss in allotments and community food growing areas through planning permissions.	A cumulative net loss in allotments and community food growing areas over a three year period.	Identify the reasons why the policy target has not been met and assess whether these issues can be overcome / what action to take. Report the outcome of this exercise in the AMR.

Housing Land Supply Graph 2026-2041

