

Appraisal of the Main Modifications to the Camden Local Plan Proposed Submission Draft

1. Introduction

- 1.1. The Camden Local Plan Proposed Submission Draft (SD02) was submitted to the Secretary of State for independent examination on 3 October 2025 and an Inspector was appointed to examine the 'soundness' of the Plan.
- 1.2. A number of examination hearing sessions were then held in public between 19 May 2026 and 11 June 2026. Following this, the Inspector wrote to the Council to confirm that the Plan is capable of being made sound through the incorporation of main modifications (ED102).
- 1.3. The proposed main modifications to the Plan are set out in the schedule of main modifications to the draft Local Plan (ED103) and for completeness are also set out in Table 1 of this report.
- 1.4. The Council are legally required to prepare a Sustainability Appraisal (SA) of the Local Plan to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process also includes Strategic Environmental Assessment as required by the Environmental Assessment of Plans and Programmes Regulations 2004. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.5. The preparation of the Local Plan and the SA have been taken forward as an iterative process and there have been three key outputs from the SA of the Local Plan to date:
 - SA Scoping Report, March 2023.
 - Sustainability Appraisal of the Draft New Local Plan (Regulation 18) January 2024.
 - Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft (Regulation 19) April 2025.
- 1.6. The Council are also legally required to undertake a Habitats Regulations Assessment (HRA) to assess the impacts of the Camden Local Plan Proposed Submission Draft against the conservation objectives of a

European Site and to ascertain whether it would adversely affect the integrity of that site. A HRA screening assessment was undertaken of both the draft Local Plan (at Regulation 18 stage) and the Proposed Submission Draft Local Plan (at Regulation 19 stage) (SD07).

2. Purpose of Report

- 2.1. This report comprises an addendum to the SA of the Camden Local Plan Proposed Submission Draft (SD03) and the Habitats Regulations Assessment of the Camden Local Plan Proposed Submission Draft (SD07) both of which were submitted as part of the Local Plan examination.
- 2.2. Table 1 (below) sets out an assessment of the proposed main modifications to the Camden Local Plan Proposed Submission Draft and assesses the effects of the proposed main modifications in order to conclude on whether they are likely to alter the findings of the SA set out in the SA Report 2025 (SD03).
- 2.3. In every case, the main modification details the proposed modification to the Plan and an assessment of the impact of the change upon the findings of the sustainability appraisal is provided in the final column of the table. Where effects have been identified, the cell in the final column has been shaded to reflect the effect identified. The assessment then discusses the proposed modification and whether or not it is likely to have:
 - Different (including greater or lesser) effects on the sustainability objectives (no change to effects score); or
 - Different (including greater or lesser) effects on the sustainability objectives (change to effects score).
- 2.4. Where a proposed main modification is identified as likely to have sustainable effects which affect the SA scoring, the effect of the modification on SA objectives (as set out in Table 3.2 of the SD03) is assessed further and the effect reported in section 4 of this report.
- 2.5. Section 5 of this report then considers whether the proposed main modifications to the Local Plan change the outcome of the HRA Screening Assessment of the Proposed Submission Draft Local Plan (SD07) in any way.

3. Sustainability Appraisal of the Proposed Main Modifications to the Local Plan

- 3.1. Table 1 sets out the assessment of the proposed main modifications to the Local Plan. Column 4 sets out the proposed modification and column 5 considers whether the proposed modification will alter the SA findings set out in the SA Report (SD03).

Table 1: SA Assessment of the proposed main modifications to the Camden Local Plan

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
WHOLE PLAN				
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 – relevant and robust evidence is submitted to 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	No change to SA findings: This proposed modification replaces iterations of the wording 'to the Council's satisfaction' in the Submission Draft Plan. The proposed modifications do not alter the Council's intention, which is to ensure relevant and robust evidence is submitted to the Council to support decision making on planning applications and will not alter the overall findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			Paragraph 12.136 (Policy D6)	
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)	No change to SA findings: This proposed modification replaces iterations of the wording 'to the Council's satisfaction' in the Submission Draft Plan. The proposed modifications do not alter the Council's intention, which is to ensure relevant and robust evidence is submitted to the Council to support decision making on planning applications and will not alter the overall findings of the SA.
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</u> to the Council's satisfaction 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)	No change to SA findings: This proposed modification replaces iterations of the wording 'to the Council's satisfaction' in the Submission Draft Plan. The proposed modifications do not alter the Council's intention, which is to ensure relevant and robust evidence is submitted to the Council to support decision making on planning applications and will not alter the overall findings of the SA.
CHAPTER 1: INTRODUCTION				
MM04		1.17 and 1.18	Propose the following modifications to paragraphs 1.17 and 1.18 – Supplementary planning documents <u>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>guidance documents</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.	No change to SA findings: The purpose of this proposed modification is to clarify the status Camden Planning Guidance will have post June 2026 and the weight it will be given in decision making. The modification is a factual update to provide clarity for decision making purposes and will not alter the overall findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			1.18 These documents <u>provide informal guidance. They are material considerations in planning decisions but have less weight in decision making than as Camden's development plan documents, but they are important supporting documents and material considerations in planning decisions.</u>	
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>	No change to SA findings: This proposed modification is to make clear that where sites have planning permission the housing numbers agreed through the permission will be considered to be a minimum, to support housing delivery. Given the capacity based housing target set out in the Plan is already expressed as a minimum requirement, this proposed modification will not alter the overall findings of the SA.
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.	No change to SA findings: This proposed modification identifies those site allocations where the indicative housing capacity has assumed full demolition and states that on these sites only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply. The SA 2025 assumed full demolition on these sites and as such the modification will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification is to make clear that the Local Plan seeks to maximise the delivery of permanent self-contained homes in the borough and that where lower housing capacities come forward on sites allocated in the Plan, these will only be supported where relevant and robust evidence is provided to justify the reduced level of housing provision. The proposed modification supports the overall approach to housing delivery in the Local Plan and will not alter the findings of the SA.
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</u>	No change to SA findings: This proposed modification sets out policy requirements for evidence, to ensure relevant and robust evidence is submitted to the Council to support decision making on planning applications and will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			<u>relevant standards and/or guidance, and robust data. This must address all material factors relevant to the policy criterion.</u>	
CHAPTER 2: DEVELOPMENT STRATEGY				
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 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 20282027/28, 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>	No change to SA findings: This proposed modification responds to the action in the Inspector's Post Hearings Letter ED102 to introduce a policy requirement requiring an early review of the Local Plan. It will not alter the findings of the SA.
CHAPTER 3: SOUTH CAMDEN				
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 Safeguarding Area, the Council will apply the Agent of Change principle in line with Policy A1 Protecting Amenity.</u>	No change to SA findings: This proposed modification clarifies that when assessing any proposals for housing or other sensitive land uses in the vicinity of the Aggregates Safeguarding Area, the Council will apply the Agent of Change principle in line with Policy A1 Protecting Amenity. The uncertain / negative effect recorded for SA Objective 4 (Amenity) will remain unchanged due to the tension identified with neighbouring residential uses. The proposed modification will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification inserts an additional criterion into the policy to ensure development in the Euston Area supports the optimisation of development in this area, recognising the opportunity to secure long-term benefits and deliver nationally significant transport infrastructure. The policy as a whole supports the efficient use of land and delivery of infrastructure and overall the proposed modification will not alter the findings of the SA.
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, research, learning and knowledge-based uses to enhance Euston's role and image in the central London and national economy;</u>...	No change to SA findings: This proposed modification clarifies that the Council will expect development to deliver new and replacement employment floorspace across the Euston Area, and support and prioritise the creation and retention of suitable floorspace for employment, education, research, learning and knowledge-based uses to enhance Euston's role and image in the central London and national economy. It will not alter the findings of the SA.
MM12	Policy S2 Euston Area	3.19	Propose to insert the following new paragraph after paragraph 3.19 –	No change to SA findings: This proposed modification seeks to reaffirm the Plans flexible implementation as

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			<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.	already noted by paragraphs 15.34 to 15.36. It will not alter the findings of the SA.
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.	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification seeks to make it clear that much of the development capacity at Euston is on land created by the redevelopment of the stations and tracks and as detailed design is yet to be undertaken the exact development capacity is still uncertain, meaning that it may be possible to deliver in excess of the development identified in Policy S2. Policy S2 sets out that the Council expects between 1,500 and 2,500 additional homes to be provided in the Euston Area and does not prescribe the amount of employment floorspace to be provided. This proposed modification could lead to an element of uncertainty against the SA objectives for Homes and the Economy, however given the existing flexibility in the policy in relation to housing and employment floorspace provision it is not considered that the modification will change the effects score of the SA
MM14	Policy S4 Bloomsbury Campus Area		Propose the following modification to Policy S4, Part A.4 – consolidate, <u>improve</u> and increase academic space	No change to SA findings: This proposed modification clarifies that development in the Bloomsbury Campus Area should seek to consolidate, improve and increase academic space. It will not alter the findings of the SA.
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 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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water network capacity to determine whether upgrades are required. It will not alter the findings of the SA.
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).	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			<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>	
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>	No change to SA findings: This proposed modification responds to comments from TfL and clarifies that development must seek to contribute towards improved access to bus services in the local area. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water supply and waste water network capacity to determine whether upgrades are required. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
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' – <u>200 280</u> additional self contained homes	No change to SA findings: This proposed modification amends the housing capacity of the site to reflect the housing capacity proposed in the current planning application on part of the site and the remaining capacity on the other part of the site. The site will continue to provide a large number of homes and this proposed modification therefore will not alter the findings of the SA.
MM21	Site Allocation Policy S7 24-86 Royal College Street (Parcelforce and ATS Tyre Site)		Propose the following modification to Site Allocation S7 '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	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water network capacity to

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			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>	determine whether upgrades are required. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification clarifies that the inclusion of small scale ground floor retail or food or drink uses would be an acceptable way of creating an active and engaging street frontage for placemaking purposes. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification clarifies that given the delivery of a publicly funded health facility on the site the requirements of Policy H2 will not be applied. The site will continue to provide a large number of homes and therefore this proposed modification will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water network capacity to determine whether upgrades are required. It will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification responds to comments made by Thames Water and removes a policy criteria because it is no longer needed. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
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>	No change to SA findings: This proposed modification clarifies that any development must retain or reuse (on site) the granite setts at Bangor Wharf, taking account of their condition. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water network capacity to determine whether upgrades are required. It will not alter the findings of the SA.
MM29	Site Allocation Policy S12 Belgrove House		Propose to delete Site Allocation S12 from the Plan. Renumber subsequent site allocations.	Site removed: This modification proposes to remove a site allocation from the Plan as it will be complete by the time the Plan is adopted. Whilst the effects recorded for this site in the SA will occur, they will not occur as a result of the policies of the Plan. They are, therefore, additional baseline effects, meaning the overall assessment in the SA will not change, as they are already allowed for as part of the cumulative assessment. It will therefore not change the overall SA findings.
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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
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>	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification clarifies that a photographic and recording report relating to the back stage facilities and machinery of the Cochrane Theatre will be required, to reflect the conditions set out in planning permission 2020/2470/P. The proposed modification seeks to mitigate further impact on the historic significance of the

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
				Cochrane Theatre, however overall it will not alter the findings of the SA.
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);	No change to SA findings: This proposed modification seeks to ensure that the design and layout of any scheme mitigates the impact of the adjacent Aggregates Safeguarding Area on occupiers in line with the Agent of Change Principle. It will not alter the findings of the SA.
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 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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
MM34	Site Allocation Policy S27 Middlesex Hospital Annex 44 Cleveland Street		Propose to delete Site Allocation S27 from the Plan. Renumber subsequent site allocations.	Site removed: This modification proposes to remove a site allocation from the Plan as it will be complete by the time the Plan is adopted. Whilst the effects recorded for this site in the SA will occur, they will not occur as a result of the policies of the Plan. They are, therefore, additional baseline effects, meaning the overall assessment in the SA will not change, as they are already allowed for as part of the cumulative assessment. It will therefore not change the overall SA findings.
MM35	Site Allocation Policy S29 Charlton Street, Godwin and Crowndale Estate		Propose to delete Site Allocation S29 from the Plan. Renumber subsequent site allocations.	Site removed: This modification proposes to remove a site allocation from the Plan as it will be complete by the time the Plan is adopted. Whilst the effects recorded for this site in the SA will occur, they will not occur as a result of the policies of the Plan. They are, therefore, additional baseline effects, meaning the overall assessment in the SA will not change, as they are already allowed for as part of the cumulative assessment. It will therefore not change the overall SA findings.
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>	No change to SA findings: This proposed modification seeks to rectify a typographical error which occurred at the publishing stage. The proposed policy wording has already been appraised in the April 2025 SA. This proposed modification will not alter the findings of the SA.
CHAPTER 4: CENTRAL CAMDEN				
MM37	Policy C1 Central Camden		Propose to delete and replace the wording in Policy C1 Part K –	No change to SA findings: This proposed modification seeks to rectify a typographical error which occurred at

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			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>	the publishing stage. The proposed policy wording has already been appraised in the April 2025 SA. This proposed modification will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water and waste water network capacity to determine whether upgrades are required. It will not alter the findings of the SA.
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. <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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water network capacity to determine whether upgrades are required. It will not alter the findings of the SA.
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)	No change to SA findings: This proposed modification seeks to clarify that the re-use of the Section House building for student accommodation is supported where it is no longer needed for police use. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water and waste water network capacity. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification responds to comments made by the National Grid and requires proposals to include a strategy for responding to the National Grid Electricity Transmission (NGET) underground Cable Route present within / adjacent to the site to mitigate any risk to the existing infrastructure. It will not alter the findings of the SA.
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.</u>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water network capacity to determine whether upgrades are required. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			<u>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>	
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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water network capacity to determine whether upgrades are required. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification responds to comments made by the National Grid and requires proposals to include a strategy for responding to the National Grid Electricity Transmission (NGET) underground Cable Route present within / adjacent to the site to mitigate any risk to the existing infrastructure. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating existing water supply network capacity. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification includes station infrastructure in the allocated uses. The station infrastructure is noted within the context and development design principles. This modification will not alter the findings of the SA.
MM50	Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 criterion 15 – <u>contribute towards, and help deliver, provide</u> step-free access to, <u>and capacity improvements at,</u> Camden Town underground station	No change to SA findings: This proposed modification clarifies that any development on this site will be expected to contribute towards, and help deliver, step-free access to, and capacity improvements at, Camden Town underground station (rather than provide). The proposed modification acknowledges that other funding would also be required to deliver step free access in this location. This creates a small degree of uncertainty for

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
				SA Objective 3 (Equality) but is not considered to alter the SA effects score.
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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to investigating water supply network capacity. It will not alter the findings of the SA.
MM53	Site Allocation C20 Highgate Centre, Highgate Road		Propose to delete Site Allocation C20 from the Plan. Renumber subsequent site allocations.	Site removed: This modification proposes to remove a site allocation from the Plan as it will be complete by the time the Plan is adopted. Whilst the effects recorded for this site in the SA will occur, they will not occur as a result of the policies of the Plan. They are, therefore, additional baseline effects, meaning the overall assessment in the SA will not change, as they are already allowed for as part of the cumulative assessment. It will therefore not change the overall SA findings.
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	No change to SA findings: This proposed modification removes 'office' uses from the allocated uses and instead specifies 'employment' uses. It will not alter the findings of the SA.
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>	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification requires development to be designed to respect the setting of the adjacent Grade I listed St Martin's Church. The proposed modification contributes positively to SA Objective 12 (Historic environment), but overall, it will not alter the effects of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
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>	No change to SA findings: This proposed modification seeks to respond to the comments made by London Gypsies and Travellers and ensures that the wording used in site allocation C27 is line with that in Policy H11 Accommodation for Travellers. It will not alter the findings of the SA.
CHAPTER 5: WEST CAMDEN				
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. <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>	No change to SA findings: This proposed modification responds to comments made by Thames Water and seeks to provide additional guidance to applicants in relation to potential upgrades to water and waste water networks. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
MM59	Site Allocation Policy W11 Abbey Co-op Housing Site		Propose to delete Site Allocation W11 from the Plan. Renumber subsequent site allocations.	Site removed: This modification proposes to remove a site allocation from the Plan as it will be complete by the time the Plan is adopted. Whilst the effects recorded for this site in the SA will occur, they will not occur as a result of the policies of the Plan. They are, therefore, additional baseline effects, meaning the overall assessment in the SA will not change, as they are already allowed for as part of the cumulative assessment. It will therefore not change the overall SA findings.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
MM60	Site Allocation Policy W13 551-557 Finchley Road		Propose to delete Site Allocation W13 from the Plan.	Site removed: This modification proposes to remove a site allocation from the Plan as it will be complete by the time the Plan is adopted. Whilst the effects recorded for this site in the SA will occur, they will not occur as a result of the policies of the Plan. They are, therefore, additional baseline effects, meaning the overall assessment in the SA will not change, as they are already allowed for as part of the cumulative assessment. It will therefore not change the overall SA findings.
MM61	Site Allocation Policy W14 317 Finchley Road		Propose to delete Site Allocation W14 from the Plan.	Site removed: This modification proposes to remove a site allocation from the Plan as it will be complete by the time the Plan is adopted. Whilst the effects recorded for this site in the SA will occur, they will not occur as a result of the policies of the Plan. They are, therefore, additional baseline effects, meaning the overall assessment in the SA will not change, as they are already allowed for as part of the cumulative assessment. It will therefore not change the overall SA findings.
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.	No change to SA findings: This proposed modification responds to comments made by Thames Water and removes a policy criterion because it is no longer needed. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification seeks to clarify that only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to applications on this site. The SA 2025 assumed full demolition on this site and as such the modification will not alter the findings of the SA.
CHAPTER 7: MEETING HOUSING NEEDS				
MM64	Policy H1 Maximising Housing Supply		Propose the following modification to Policy H1 Part A – 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>	No change to SA findings: This proposed modification clarifies that the housing target includes the final three years of the London Plan 2021 housing target. It will not alter the findings of the SA.
MM65	Policy H1 Maximising housing supply		Propose the following modification to Policy H1 Part B 2 –	No change to SA findings: This proposed modification clarifies that the Council will support other forms of permanent housing to meet more specific needs

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			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	including housing with shared facilities. Policy H10 housing with shared facilities already seeks to ensure that there is continued provision of housing with shared facilities to meet the needs of small households in Camden. This proposed modification therefore will not alter the SA findings.
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>...	No change to SA findings: This proposed modification responds to the actions set out in the Inspector's post hearings letter (ED90) in respect of the approach to demonstrating a reasonable prospect of housing delivery and the use of the term 'to the Council's satisfaction'. The wording relating to deliverability has been revised for effectiveness and clarity, to ensure that it does not imply a requirement to demonstrate that housing is not deliverable at any point over the full Plan period but instead allows for a proportionate assessment based on realistic delivery prospects. This retains the Plan's clear priority for housing delivery, while ensuring that the policies are sufficiently flexible, justified and effective in application. This modification will not alter the effects of the SA.
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>.	No change to SA findings: This proposed modification responds to the actions set out in the Inspector's post hearings letter (ED90) in respect of the approach to demonstrating a reasonable prospect of housing delivery and the use of the term 'to the Council's satisfaction'. The wording relating to deliverability has been revised for effectiveness and clarity, to ensure that it does not imply a requirement to demonstrate that housing is not deliverable at any point over the full Plan period but instead allows for a proportionate assessment based on realistic delivery prospects. This retains the Plan's clear priority for housing delivery, while ensuring that the policies are sufficiently flexible, justified and effective in application. This modification will not alter the effects of the SA.
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</u> achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing."	No change to SA findings: This proposed modification removes reference to the London Plan 2021 strategic target for 50% of new homes to be affordable and inserts reference to the London Plan's threshold approach to applications. This modification seeks to ensure that the Local Plan is aligned with the London Plan 2021 and does not change the overall approach to seeking affordable housing or the borough wide delivery target of 3,000 additional affordable homes from 2026/27 –

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
				2040/41. This modification will not alter the effects of the SA.
MM69	Policy H4 Maximising the supply of affordable housing		Propose the following modification to Policy H4 Part B (5) - 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 ;	No change to SA findings: This proposed modification removes reference to the London Plan 2021 strategic target for 50% of new homes to be affordable and inserts reference to the London Plan's threshold approach to applications. This modification seeks to ensure that the Local Plan is aligned with the London Plan 2021 and does not change the overall approach to seeking affordable housing or the borough wide delivery target of 3,000 additional affordable homes from 2026/27 – 2040/41. This modification will not alter the effects of the SA.
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.	No change to SA findings: This proposed modification is consequential to the modifications proposed to Part A and Part B of Policy H4 set out in MM68 and MM69 above. They provide further detail on how the London Plan threshold approach will operate in Camden. This modification will not alter the findings of the SA.
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> "	No change to SA findings: This proposed modification is consequential to the modifications proposed to Part A and Part B of Policy H4 set out in MM68 and MM69 above. They provide further detail on how the London Plan threshold approach will operate in Camden. This modification will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
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.	No change to SA findings: This proposed modification is consequential to the modifications proposed to Part A and Part B of Policy H4 set out in MM68 and MM69 above. They provide further detail on how the London Plan threshold approach will operate in Camden. This modification will not alter the findings of the SA.
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 - 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." <u>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.</u> Renumber subsequent paragraphs.	No change to SA findings: This proposed modification is consequential to the modifications proposed to Part A and Part B of Policy H4 set out in MM68 and MM69 above. They provide further detail on how the London Plan threshold approach will operate in Camden. This modification will not alter the findings of the SA.
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. <u>For schemes following either the London Plan fast track or viability tested</u>	No change to SA findings: This proposed modification will not alter the findings of the SA. It has been made 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.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			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 routeschemes , the Council will <u>also</u> 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.	
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.	No change to SA findings: This proposed modification responds to comments made by the GLA and seeks to add additional clarity as to how Policy H4 Part B6 will operate. It will not alter the findings of the SA.
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 remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build to rent housing). Subject to Where development proposals do not satisfy the relevant sliding scale target or the London Plan viability threshold approach , we will expect submission of a financial viability appraisal to justify the proportion of affordable housing proposed and demonstrate that the proposed affordable housing is deliverable, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme.	No change to SA findings: This proposed modification clarifies how affordable housing contributions will be negotiated for certain developments. This does not alter the overall policy approach and will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification clarifies what is meant by disproportionate loss of self-contained homes in the context of student housing proposals. This proposed modification will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
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.	No change to SA findings: This proposed modification is consequential to the modification proposed to Part B of Policy H9 set out in MM77. It will not alter the findings of the SA.
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 within the Plan period <u>in the short to medium term</u>.	No change to SA findings This proposed modification responds to the action set out in the Inspector's post hearings letter (ED90) in respect of the approach to demonstrating a reasonable prospect of housing delivery. The wording relating to deliverability has been revised for effectiveness and clarity, to ensure that it does not imply a requirement to demonstrate that housing is not deliverable at any point over the full Plan period but instead allows for a proportionate assessment based on realistic delivery prospects. This retains the Plan's clear priority for housing delivery, while ensuring that the policies are sufficiently flexible, justified and effective in application. This modification will not alter the effects of the SA.
MM80	Policy H10 Housing with shared facilities (including large-scale purpose-built shared living)		Propose the following modification to Policy H10 Part B(1) – 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;	No change to SA findings: This proposed modification clarifies what is meant by disproportionate loss of self-contained homes in the context of proposals for housing with shared facilities. This proposed modification will not alter the findings of the SA.
MM81	Policy H10 Housing with shared facilities (including large-	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</u>	No change to SA findings: This proposed modification is consequential to the modification proposed to Part B of Policy H10 set out in MM80. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
	scale purpose-built shared living)		<u>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.	
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 <u>reasonable realistic</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>.	No change to SA findings: This proposed modification responds to the action set out in the Inspector's post hearings letter (ED90) in respect of the approach to demonstrating a reasonable prospect of housing delivery. The wording relating to deliverability has been revised for effectiveness and clarity, to ensure that it does not imply a requirement to demonstrate that housing is not deliverable at any point over the full Plan period but instead allows for a proportionate assessment based on realistic delivery prospects. This retains the Plan's clear priority for housing delivery, while ensuring that the policies are sufficiently flexible, justified and effective in application. This modification will not alter the effects of the SA.
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>	No change to SA findings: This proposed modification includes the ten year pitch target in line with London Plan Policy H14. The overall need for Plan period is however still estimated to be 19 pitches (including the existing pitches in Camden). This modification will not alter the positive effect recorded in the SA.
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:...	No change to SA findings: This proposed modification clarifies the number of pitches to be delivered on sites allocated in the Plan. It will not alter the findings of the SA.
MM85	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part D – <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:	No change to SA findings: This proposed modification clarifies that the Council will support the delivery of windfall sites (those not allocated in the Plan) to help meet the needs of Camden's Traveller community. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
MM86	Policy H11 – Accommodation for travellers		Propose the following modification to Policy H11 Part D (7) – be attractive and of the highest design quality;	No change to SA findings: This proposed modification removes the requirement for sites to be ‘attractive’. It is a minor deletion and will not alter the findings of the SA.
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>	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification seeks to ensure that new Traveller pitches provided in Camden are designed in consultation with the Traveller community. It also states that applications for new sites, pitches and/or plots should be accompanied by a detailed management plan. This criterion is likely to enhance effects for SA Objective 1 (Homes) and Objective 3 (Equalities) by ensuring that new pitches are designed to meet the needs of the Traveller community and promote social inclusion. Overall the modification will not alter the effects score.
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> Renumber subsequent paragraphs.	No change to SA findings: This proposed modification is consequential to the other proposed modifications to Policy H11 set out above. It clarifies how the Council propose to meet the need for Traveller accommodation in Camden. It will not alter the findings of the SA.
CHAPTER 8: RESPONDING TO THE CLIMATE EMERGENCY				
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...	No change to SA findings: This proposed modification clarifies that developers considering the substantial demolition of existing buildings will be expected to undertake a development options appraisal where appropriate. It will not alter the findings of the SA.
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	No change to SA findings: This proposed modification clarifies the circumstance whereby the Council will permit proposals which include substantial demolition. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			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.	
MM91	Policy CC2 Prioritising the retention of existing buildings	8.15	Propose to insert the following new paragraph after paragraph 8.15 – <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> Renummer subsequent paragraphs.	No change to SA findings: This proposed modification is consequential to the proposed modification to Part B of Policy CC2 set out above in MM89. It seeks to clarify instances where a development options appraisal will not be required. It will not alter the findings of the SA.
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;	No change to SA findings: This proposed modification clarifies that public transport infrastructure will be considered by the Council when assessing whether a proposal constitutes the best use of a site. It will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification clarifies that development proposals that involve less than substantial demolition will not be required to submit a pre-demolition audit for any demolition works. Policy CC2 Part D already requires applications involving less than substantial demolition to demonstrate that the proportion of the building being demolished is reduced in accordance with the waste hierarchy. Given this, the proposed modification will not change the findings of the SA.
MM94	Policy CC3 Circular economy and reduction of waste		Propose the following modification to Policy CC3 Part C – The Council will require applications for new-build major development (and major development which involves substantial demolition and rebuild) to submit a Circular Economy Statement.	No change to SA findings: This proposed modification seeks to clarify where a Circular Economy Statement will be required. It will not alter the findings of the SA.
MM95	Policy CC3 Circular economy and reduction of waste	8.37	Propose the following modification to Paragraph 8.37 – For new-build major applications (<u>providing 10 or more new homes or 1,000 square meters or more of new or replaced floorspace</u>), 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).	No change to SA findings: This proposed modification seeks to clarify where a Circular Economy Statement will be required. It will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification clarifies which types of development the policy requirement applies to. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
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>	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification is to ensure the Plan is in line with London Plan Guidance on whole life cycle carbon assessment. The modification will ensure that applications for major development in Camden accurately report on whole life carbon emissions on completion. This will enable comparisons to be made between an application stage WLC assessment and a post completion WLC, meaning that lessons can be learnt in relation to how effective measures outlined in the WLC statement are in reducing whole life carbon emissions. Overall it will not alter the findings of the SA.
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>	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification provides further guidance to applicants on how Policy CC4 will operate and relates to instances where a whole life cycle assessment has not fully assessed the carbon impact of a proposal. The modification should ensure robust information is provided at the planning application stage which may reduce whole life carbon emissions and will enhance the minor positive effect of SA Objective 8 (Energy and resources). Overall, it will not impact the SA effect score.
MM99	Policy CC6 Energy use and the generation of renewable energy		Propose the following modification to Policy CC6 Parts A.2 and A.3 – 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 – <u>35-62</u> kWh/m2 GIA/year; d. care homes – <u>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.	No change to SA findings: This proposed modification amends the Energy Use Intensity targets for the student and care home typologies set out in Policy CC6 Part A. This responds to comments made and evidence prepared as part of the examination of the Plan. The SA scored this policy as having a significant positive effect on SA Objective 8 (Energy and resources). This reflects the overall policy approach set out in Policy CC6 in terms of facilitating a change to low carbon heat, maximising renewable energy generation, and promoting energy efficient design and systems. Whilst the EUI target for student accommodation and care homes is now proposed to be lower than the previous target, it will not alter the overall effect of this policy. Given this, it will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification has been made in response to the Inspectors post hearing letter (ED90), to remove the wording 'to the Council's satisfaction'. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
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;...	No change to SA findings: This proposed modification provides further information on other measures that could be used to reduce the overheating risk in buildings and the spaces around buildings. It will not alter the findings of the SA.
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).	No change to SA findings: This proposed modification provides further information on other measures that could be used to reduce the overheating risk in buildings and the spaces around buildings. It will not alter the findings of the SA.
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;	No change to SA findings: This proposed modification clarifies that we will require all residential development to meet the optional requirement for water efficiency set out in Part G of the Building Regulations or any higher standard that may be adopted. It will not alter the findings of the SA.
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>	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification clarifies that 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. This will likely have more positive sustainable effects for SA Objective 9 (Water) but overall will not impact the SA effects score.
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.	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification seeks to ensure that development within the Counters Creek catchment goes beyond the policy criteria in Part C of the policy, to achieve a greenfield run-off rate where feasible. This modification should improve the sustainability effects of the policy against SA Objective 10 (Resilience) but overall are not considered to impact the SA effects score.
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.	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification seeks to ensure that development within the Counters Creek catchment goes beyond the policy criteria in Part C of the policy, to achieve a greenfield run-off rate where feasible. This modification should improve the sustainability effects of

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
				the policy against SA Objective 10 (Resilience) but overall are not considered to impact the SA effects score.
CHAPTER 9: DELIVERING AN INCLUSIVE ECONOMY				
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.	No change to SA findings: This proposed modification provides greater flexibility for applicants undertaking a marketing exercise to demonstrate why the loss of an office is acceptable. The modification clarifies that one agent can be used rather than a variety of agents. It will not alter the findings of the SA.
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:...	No change to SA findings: This proposed modification has been made in response to the Inspectors post hearing letter (ED90), to remove the wording 'to the Council's satisfaction'. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification provides greater flexibility for applicants undertaking a marketing exercise to demonstrate why the loss of an office is acceptable. The modification clarifies that one agent can be used rather than a variety of agents. It will not alter the findings of the SA.
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 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</u>	No change to SA findings: This proposed modification replaces paragraph 9.37 of the Plan and provides further guidance to applicants on what they need to explore as part of any marketing exercise, where the loss of an office is being considered. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			<u>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...	No change to SA findings: This proposed modification clarifies that we will also support the reuse of office buildings for education use in the Bloomsbury Campus Area, where it can be demonstrated that an office use is no longer feasible. It will not alter the findings of the SA.
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.	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification provides further information how the Council will apply Policy IE2 in respect of large cultural, educational and health institutions in the borough. This should provide greater certainty to these institutions in the borough allowing them to grow and change, enhancing the positive effects of SA Objective 14 (Economy and employment). Overall, the modification is not likely to change the scoring of the SA effects.
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 industrial capacity over the long-term. Given this, other land</u>	No change to SA findings: This proposed modification clarifies that 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 and that subject to other relevant Local Plan policies, the Council will support proposals for the location of such uses on non-designated industrial land, subject to certain provisions. The proposed modification doesn't change the Council's overall approach to industrial land, and it will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			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	No change to SA findings: This proposed modification clarifies that 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, subject to viability. It will not alter the findings of the SA.
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;	No change to SA findings: This proposed modification clarifies the size threshold of smaller and medium sized hotels. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification clarifies that the policy does not apply to 'production kitchens', which prepare food to be consumed in restaurants. It will not alter the findings of the SA.
CHAPTER 10: SUPPORTING CAMDEN'S COMMUNITIES				
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.	No change to SA findings: This proposed modification clarifies how Part C of Policy SC1 will be applied to non-major applications. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification clarifies where a financial contribution is sought to deliver off-site community food growing projects (in lieu of on-site provision). This contribution will form part of the overall open space requirement generated by the development under Policy SC4 (Open Space). This wording puts into policy text which is already included at paragraph 10.89 of the Plan. It will not alter the findings of the SA.
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> :	No change to SA findings: This proposed modification clarifies that where a proposal includes new or relocated cultural facilities, or additional floorspace, the Council will expect the applicant to certain information, as set out in

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
				the policy, where appropriate. It will not alter the findings of the SA.
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 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.	No change to SA findings: This proposed modification provides further information on the application of Policy SC6 Part D. It will not alter the findings of the SA.
CHAPTER 11: THE NATURAL ENVIRONMENT				
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>.	No change to SA findings: This proposed modification has been made to clarify that we will expect suitable developments to integrate measures to support wildlife, including permeable garden borders, such as hedges. It will not alter the findings of the SA.
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...	No change to SA findings: This proposed modification clarifies that the benchmark is a minimum (not a maximum). It will not alter the findings of the SA.
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>.	No change to SA findings: This proposed modification has been made in response to the Inspectors post hearing letter (ED90), to remove the wording 'to the Council's satisfaction'. It will not alter the findings of the SA.
CHAPTER 12: DESIGN AND HERITAGE				
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.	No change to SA findings: This proposed modification has been made for clarity. It will not alter the findings of the SA.
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	No change to SA findings: This proposed modification has been made to ensure consistency in wording across the plan. It will not alter the findings of the SA.
MM126	Policy D2 Tall buildings		Propose the following modification to Policy D2 Part C.8 –	Different (including greater or lesser) effects on the sustainability objectives (no change to effects score): This proposed modification has been made to ensure that

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			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).	the historic context of neighbouring boroughs is considered when assessing proposals for tall buildings. The modification is likely to assist in reducing the uncertainty of effects for SA Objective 12 (Historic environment) but overall is not likely to change the effects score of the SA.
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>	No change to SA findings: This proposed modification has been made to clarify that 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. It will not alter the findings of the SA.
MM128	Policy D6 Basements		Propose the following modification to Policy D6 Part A.1 – neighbouring properties <u>and infrastructure</u> .	No change to SA findings: This proposed modification has been made to clarify that the Council will only permit basement development where it is demonstrated that the proposal would not cause harm to neighbouring properties and infrastructure. It will not alter the findings of the SA.
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 <u>4. be less than 1.5 times the footprint of the host building in area;</u> <u>5. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;</u> <u>6. not extend into or underneath the garden further than 50% of the depth of the garden;</u> 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.	No change to SA findings: This proposed modification removes reference to basements not exceeding the footprint of the host building in area and replaces it with criteria from the Camden Local Plan 2017 to ensure that appropriate limits continue to apply to basement development. It will not alter the findings of the SA
MM130	Policy D6 Basements		Propose the following modifications to Policy D6 Part D – Exemptions to C(1) to C(5 7) above may be made on large comprehensively planned sites.	No change to SA findings: This proposed modification is consequential to the modification to Part C of the policy set out above. It will not alter the findings of the SA.
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) prioritising biodiversity enhancements where possible.</u> <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>	Different (including greater or lesser) effects on the sustainability objectives (change to effects score): This proposed modification clarifies that impacts on garden space or trees should be considered in accordance with Policy NE2 (biodiversity) and that opportunities should be taken to increase soft landscaping, trees and biodiversity. The added requirement of a landscaping or planting plan should provide greater certainty of protecting habitat and provides opportunity to enhance habitat and wildlife

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
				refuge areas. The modification is likely to give rise to a minor positive effect for SA Objective 6 (Biodiversity) where the effect was neutral.
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.	No change to SA findings: This proposed modification is consequential to the proposed modification to D6 Part C set out in MM129 above. It will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification is consequential to the proposed modification to D6 Part C set out in MM129 above. The additional text is necessary to explain how the size criteria operate and reinstates wording the Camden Local Plan 2017. It will not alter the findings of the SA.
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.	Different (including greater or lesser) effects on the sustainability objectives (change to effects score): This proposed modification is consequential to the proposed modification to D6 Part E. 8 and the proposed addition of new criteria E.9 set out in MM131. It adds text to explain how basement developments should protect and enhance biodiversity. The added requirement of a landscaping or planting plan should provide greater certainty of protecting habitat and provides opportunity to enhance habitat and wildlife refuge areas. The modification is likely to give rise to a minor positive effect for SA Objective 6 (Biodiversity) where the effect was neutral.
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	No change to SA findings: This proposed modification is consequential to the proposed modification to D6 Part C.4 set out in MM129. The deleted text is no longer required. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
			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.	
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 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. Renumber subsequent paragraphs.	Different (including greater or lesser) effects on the sustainability objectives (change to effects score): This proposed modification is consequential to the proposed modification to D6 Part E. 8 and the proposed addition of new criteria E.9 set out in MM131. The modification clarifies the approach to biodiversity in relation to large gardens and to taking opportunities for biodiversity improvements.
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.	No change to SA findings: This proposed modification is consequential to the proposed modification to D6 Part C.4 set out in MM129. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
CHAPTER 13: PROTECTING AMENITY				
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.	No change to SA findings: This proposed modification has been made in response to the Inspectors post hearing letter (ED90), to remove the wording 'to the Council's satisfaction'. It will not alter the findings of the SA.
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>	No change to SA findings: This proposed modification clarifies that if an air quality assessment includes an assessment of laboratory flues, or consideration of other emissions which need specialist consideration, the Council will seek independent verification of the assessment, to be paid for by the developer. It will not alter the findings of the SA.
CHAPTER 14: SAFE, HEALTHY AND SUSTAINABLE TRANSPORT				
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>	No change to SA findings: This proposed modification has been made to include reference to High Speed 2 and Crossrail 2 (both safeguarded strategic infrastructure projects) in the policy, for clarity. It will not alter the findings of the SA.
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;	No change to SA findings: This proposed modification has been made to ensure the policy approach is in line with the London Plan 2021. It will not alter the findings of the SA.
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.	No change to SA findings: This proposed modification has been made in response to the Inspectors post hearing letter (ED90), to remove the wording 'to the Council's satisfaction'. It will not alter the findings of the SA.
CHAPTER 15: DELIVERY AND MONITORING				
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>	No change to SA findings: This proposed modification responds to the action in the Inspector's Post Hearings Letter ED102 to introduce a policy requirement requiring an early review of the Local Plan. It is a minor amendment to supporting text. It will not alter the findings of the SA.

Reference	Policy	Paragraph	Proposed Modification	Will the proposed Main Modification alter the SA findings set out in the full SA Report April 2025?
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>	No change to SA findings: This proposed modification responds to the action in the Inspector's Post Hearings Letter ED102 to introduce a policy requirement requiring an early review of the Local Plan. It will not alter the findings of the SA.
MM146		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>	No change to SA findings: This proposed modification responds to the action in the Inspector's Post Hearings Letter ED102 to introduce a policy requirement requiring an early review of the Local Plan. It will not alter the findings of the SA.
APPENDICIES				
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.	No change to SA findings: The updated Local Plan monitoring framework (ED98) does not alter the findings of the SA.
MM148			Propose to incorporate the housing land supply trajectory set out in ED99 Housing Land Supply Table into the Plan as Appendix 6.	No change to SA findings: The housing land supply trajectory illustrates how housing land is expected to come forward over the Plan period to deliver the Local Plan housing target set out in Policy H1 Maximising Housing Supply. The Local Plan Housing Land Supply Trajectory (ED99) does not alter the findings of the SA.

4. Summary of the findings of the Sustainability Appraisal

- 4.1. All of the proposed main modifications to the Local Plan have been subject to SA, the findings of which are presented in Table 1 above. Of the 148 main modifications proposed there are:
- Three proposed main modifications (MM131, MM134, MM136) which are likely to result in additional effects to those identified in the SA;
 - 11 proposed main modifications that are considered to have 'Different (including greater or lesser) effects on the sustainability objectives' however the modification itself does not result in a change to the SA effect score; and
 - Seven site allocations which are proposed for deletion as these will be complete by the time the Plan is adopted. Whilst the effects recorded for these sites in the SA will occur, they will not occur as a result of the policies of the Plan. They are, therefore, additional baseline effects, meaning the overall assessment in the SA will not change, as they are already allowed for as part of the cumulative assessment.
- 4.2. Furthermore, Policy D6 (Basements) is now expected to have a minor positive effect in relation to SA Objective 6 Biodiversity, as the added requirement of a landscaping or planting plan is likely to provide greater certainty of protecting habitat and provides opportunity to enhance habitat and wildlife refuge areas.
- 4.3. Overall however the majority of the proposed main modifications to the Local Plan will not alter the findings set out in the SA (SD03) or HRA (SD07) because they represent either factual or minor updates, clarifications or consequential changes, which do not result in a material change to policy, or how the policies will be implemented.
- 4.4. In addition to this, it is not considered that any of the proposed main modifications result in the identification of reasonable alternatives that require consideration through the SA.
- 4.5. Furthermore, whilst seven site allocations are proposed for deletion as they will be complete by the time the Plan is adopted, and the capacity of one site allocation has been reduced to reflect the housing capacity proposed in the current planning application on part of the site and the remaining capacity on the other part of the site, the proposed main modifications are not considered to change the overall quantum and/ or location of growth that would be delivered through the Plan.

- 4.6. Finally, it is not considered that the proposed main modifications to the Local Plan have altered the secondary, cumulative and synergistic effects previously recorded and presented in section 7.16 in the full SA Report (SD03).
- 4.7. It should also be noted that the Council has prepared a series of more minor additional modifications to the Local Plan, covering minor corrections, clarifications and consequential changes to the Camden Local Plan, all of which have no effect on the findings of the SA.

5. Habitats Regulations Assessment

- 5.1. A Habitats Regulations Assessment (HRA) was undertaken of the Camden Local Plan Proposed Submission Draft (SD07). This concluded that:
- 5.2. “The policies in the Camden Local Plan Proposed Submission Draft, in combination with other plans and projects, are not considered likely to have significant effects on the sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. This Screening assessment has considered the scope of the Local Plan and its relationship with other plans, in particular the adopted London Plan. Therefore it is not considered necessary to carry out Task 2 (Appropriate Assessment) and Task 3 (mitigation and alternative solutions) of the Habitats Regulations Appropriate Assessment.”
- 5.3. Natural England had no comments to make on the HRA Screening Assessment, and no other comments were received on the HRA as part of the Regulation 19 consultation on the Proposed Submission Draft Local Plan.
- 5.4. Given that the proposed main modifications to the Local Plan are either general updates, clarifications or consequential changes, which do not result in a material change to policy, it is not considered that a full review of the HRA is necessary as they do not change the outcome of the HRA Screening Assessment.

6. Next steps

- 6.1. The proposed main modifications to the Local Plan are published for public consultation from 12 October to 23 November 2026. This report is also available for comment during the consultation period. Responses on the main

modifications will be forwarded to the Inspector, who will take them into account before issuing their report. Subject to the Inspector finding the Plan sound, the final version of the Local Plan will then be reported to Cabinet and Full Council in 2027 for adoption. Following the adoption of the Local Plan, the Council will issue a Sustainability Appraisal Adoption Statement.

7. Monitoring

- 7.1. The SA Report (SD03) presents a range of high level suggested monitoring measures in Chapter 8 which can be developed as necessary as the Plan is implemented. The work carried out in relation to the proposed main modifications does not necessitate any changes to the indicators and the updated Local Plan Monitoring Indicators set out in ED98 and MM147, whilst more detailed, are consistent with them.