

London Borough Camden Statement on Matter 10: Site Allocations and Area Based Policies

Issue 1: Site Allocations (South Camden)

Whether the preferred site allocations and area based policies are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.

Site Allocation S5 120 – 136 Camley Street

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S5 was identified through the London SHLAA 2017 and the Council's Community Investment Programme.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the King's Cross area as being central to this. Noting that this area has the potential to strengthen its role as a location for employment and business; and deliver a significant increase in the number, mix and affordability of homes; to enable the area to fully realise its potential and become a more distinctive, vibrant, and mixed urban neighbourhood.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the London SHLAA. The site boundary was altered after Regulation 18 following engagement with the Council's Community Investment Programme Team.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, and employment (including light industrial, maker spaces, offices).

The allocation promotes the comprehensive re-development of this site which is characterised by low density light industrial uses and car repair workshops. This is in line with the Camley Street Neighbourhood Plan which recognises the potential for development on this site and the Council's adopted Canalside to Camley Street Supplementary Planning Document which envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.

The allocation seeks to optimise the use of the site to enable the co-location of housing, employment and other proposed uses without compromising the operation of employment uses and through the intensification of the employment floorspace on the site.

Furthermore, the allocation seeks to optimise the provision of additional homes to help meet Camden's identified housing need.

The allocated uses are considered justified given the current use of the site, the character of the area, and the need to optimise the use of the site to deliver housing in line with Policy H2 and Policy DS1.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 110 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving employment and residential uses has been modelled. As the existing structures on site are low level, industrial, shed like

structures which are unlikely to be suitable for extension, it is considered that a scheme involving demolition on this site has the potential to provide benefits substantially greater than those that could be realised through the retention of the existing buildings. However, any application involving the substantial demolition of an existing building/s will need to demonstrate compliance with Policy CC2 Retention of Existing Buildings, including consideration of whether the specific scheme proposed would constitute the best use of the site. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the employment use is included in the allocation. However given the existing use of the site and its location in the Knowledge Quarter, it is considered justified to deliver a mix of uses here in line with Policy DS1 and H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S5 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S5 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- Water supply. 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.

- Viewing corridors. Two London View Management Framework views cross the site, identified in the Mayor's SPG. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.

In addition to the above criteria Policy S5 also sets out other site specific requirements relating to design and layout; delivery of development; the intensification of employment floorspace; co-location of uses; provision of housing; meeting particular housing needs; agent of change / amenity; access and servicing; biodiversity; tall buildings; public realm and connectivity enhancement projects; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy S5 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

The Camden Building Height Study (EB34) identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 42m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been

shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 13% of the site identified at medium/high risk of surface water flooding. The site is also in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate. This site has been identified as being in an area of poor air quality which needs consideration through the planning application process. Given this, an additional criterion has been added to the site allocation policy in relation to air quality.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S5 is located next to Camden Square Conservation Area. There are no listed or locally buildings on or adjacent to the site. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2029/30 - 2030/31 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

Furthermore, criterion 8 states that development must be designed to minimise the impact of operational vehicles, parking and servicing on existing streets, by coordinating and incorporating shared access points, and off street parking and servicing arrangements with compatible neighbouring uses.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

¹ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council priorities for the site as set out in the Canalside to Camley Street SPD (LD45) and key stakeholder's comments.

This site is currently subject to a planning application and the infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2029/30 - 2030/31 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has recently been granted planning permission subject to referral to the Mayor of London and agreement of the Section 106. The site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The land within the site allocation is in single Council ownership.

The Council is not aware that land assembly is required to take this site forward.

Planning permission (ref 2025/4341/P) has recently been granted subject to referral to the Mayor of London and agreement of the Section 106 for 'Demolition of all existing buildings (Class B2) and structures and associated works and erection of new buildings comprising a mixed-use redevelopment of residential (Class C3) and commercial (Class E) uses, together with all landscaping, public realm, cycle parking, car parking, highways works and associated works (see associated application ref. 2025/4364/P at 3-30 Cedar Way)(Site Allocation S6).

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM11, MM12 and MM92.

Site Allocation S6 104 – 114 Camley Street and Cedar Way Industrial Estate

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S6 was identified through the London SHLAA 2017, the 2018 call for sites and discussions with the Council's Community Investment Programme Team.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the King's Cross area as being central to this. Noting that this area has the potential to strengthen its role as a location for employment and business; and deliver a significant increase in the number, mix and affordability of homes; to enable the area to fully realise its potential and become a more distinctive, vibrant, and mixed urban neighbourhood.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the London SHLAA and the 2018 call for sites. The boundary was altered after Regulation 18 following engagement with the Council's Community Investment Programme Team.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and employment (including research and knowledge-based uses, light industrial, maker spaces, offices).

The site is a non-designated industrial area occupied by low rise commercial units of varying condition and is currently home to a range of uses including food processing and supplies, designers, heating and plumbing supplies, wholesale warehousing and distribution, IT services and offices.

The allocation promotes the comprehensive re-development of this site. This is in line with the Camley Street Neighbourhood Plan which recognises the potential for development on this site and the Council's adopted Canalside to Camley Street Supplementary Planning Document which envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.

The allocation seeks to optimise the use of the site to enable the co-location of housing, employment and other proposed uses without compromising the operation of employment uses and through the intensification of the employment floorspace on the site.

Furthermore, the allocation seeks to optimise the provision of additional homes to help meet Camden's identified housing need.

The allocated uses are considered justified given the current use of the site, the character of the area, and the need to optimise the use of the site to deliver housing in line with Policy H2 and Policy DS1.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 750 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving employment and residential uses has been modelled. As the existing structures on site are low level, industrial, shed like

structures which are unlikely to be suitable for extension, it is considered that a scheme involving demolition on this site has the potential to provide benefits substantially greater than those that could be realised through the retention of the existing buildings. However, any application involving the substantial demolition of an existing building/s will need to demonstrate compliance with Policy CC2 Retention of Existing Buildings, including consideration of whether the specific scheme proposed would constitute the best use of the site. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the employment use is included in the allocation. However given the existing use of the site and its location in the Knowledge Quarter, it is considered justified to deliver a mix of uses here in line with Policy DS1 and H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S6 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S6 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- Water supply / Wastewater Network. 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.

- Viewing corridors. Two London View Management Framework views cross the site, identified in the Mayor's SPG. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.

In addition to the above criteria Policy S6 also sets out other site specific requirements relating to design and layout; delivery of development; the intensification of employment floorspace; co-location of uses; provision of housing; provision of employment floorspace; meeting particular housing needs; agent of change / amenity; community provision; green infrastructure; active frontages; routes and connectivity; biodiversity; impact on adjacent uses; tall buildings; public realm and connectivity enhancement projects; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy S6 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context?

The Camden Building Height Study (EB34) identified this site as a location where tall buildings may be an appropriate form of development, with 15m to 62m outside the London View Management Framework (LVMF) viewing corridor and 15m – 45m inside the LVMF viewing corridor considered the potentially appropriate height ranges. Additional height, above these potentially appropriate height ranges, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site

Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 35% of the site identified at medium/high risk of surface water flooding. The site is also in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate. This site has been identified as being in an area of poor air quality which needs consideration through the planning application process. Given this, an additional criterion has been added to the site allocation policy in relation to air quality.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S6 is not located within or adjacent a Conservation Area. There are no listed or locally buildings on the site. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in phases between years 2029/30 - 2035/36 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans².

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

² That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council priorities for the site as set out in the Canalside to Camley Street SPD (LD45) and key stakeholder's comments.

Part of this site is currently subject to a planning application and the infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in phases between years 2029/30 - 2035/36 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

In addition to the Viability Study of the Local Plan (EB01), BNPPRE also undertook an assessment to consider the viability of four strategic sites in the Plan (Policy S5: 120-136 Camley Street and Policy S6:104-114 Camley Street and Cedar Way Industrial Estate; Policy C2: Regis Road and Holmes Road Depot; and Policy C3: Murphy Site) (EB09). These sites are considered to be strategic in terms of the scale of housing the Plan anticipates that they will accommodate, and the contribution it would make towards meeting the Plan's housing target. The other strategic sites in the Plan (namely C7 Morrisons Supermarket and W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road) were not assessed as part of this work as they are already subject to planning permission.

The viability testing of the allocated sites reflects a similar picture of viability as the typology testing, in that the Study identifies that viability can be challenging where

the value of the existing uses on the site are high and the sales values on the new development are not at the upper end of achievable values.

It is anticipated that, over the plan period, the market will improve with build cost inflation stabilising to a more typical rate of increase, lower interest rates and residential sales values showing a return to growth. This is supported by Savills January 2026 forecasts, which show growth of 8.1%, 12% and 13% for Prime Central London, Outer Prime London and Mainstream London markets respectively between 2026 and 2030.

The Viability Study concluded that the site allocations tested are developable in the terms defined by the National Planning Policy Framework and that the policies in the Plan build in an appropriate level of flexibility, both specifically where policies have cost implications, as well as identifying an overarching flexible approach. It is therefore considered that the flexibility in the policies in the Plan in terms of feasibility and viability will ensure that the identified strategic sites will be able to come forward as planned.

s. The situation with regards land ownership, land assembly and developer interest

The whole site is in multiple ownership, both private and Council.

The Council is not aware that land assembly is required to take this site forward.

Planning permission (ref 2025/4364/P) has recently been granted on the Council owned part of the site (3-30 Cedar Way) subject to referral to the Mayor of London and agreement of the Section 106. The permission is for the ' Demolition of all existing buildings (Class E and B8) and structures and associated works and erection of new buildings comprising a mixed use redevelopment of residential (Class C3) and commercial (Class E) uses, together with all landscaping, public realm, cycle parking, car parking, highways works and associated works'. This application is part of a wider regeneration proposal involving Site Allocation S5 also.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM13 and MM14.

Site Allocation S7 24 – 86 Royal College Street (Parcelforce and ATS Tyres)

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site

including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S7 was identified through the Site Allocation Plan 2013.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the King's Cross area as being central to this. Noting that this area has the potential to strengthen its role as a location for employment and business; and deliver a significant increase in the number, mix and affordability of homes; to enable the area to fully realise its potential and become a more distinctive, vibrant, and mixed urban neighbourhood.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the Site Allocations Plan 2013.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, and employment (including research and knowledge-based uses).

This site is allocated to deliver mixed use development in line with Policy H2 and Policy DS1. The allocated uses are considered justified given the current use of the site, the character of the area, and the need to optimise the use of the site to deliver housing to help meet identified need.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 280 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving employment and residential uses has been modelled. Part of the site is already cleared, and the remaining element is a shed like structure, which is unlikely to be suitable for extension. Given this it is considered that a scheme involving demolition on this site has the potential to provide benefits substantially greater than those that could be realised through the retention of the existing buildings. However, any application involving the substantial demolition of an existing building/s will need to demonstrate compliance with Policy CC2 Retention of Existing Buildings, including consideration of whether the specific scheme proposed would constitute the best use of the site. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the employment use is included in the allocation. However given the existing use of the site and its location in the Knowledge Quarter, it is considered justified to deliver a mix of uses here in line with Policy DS1 and H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S7 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The site is in close proximity to the Regent's Canal and King's Cross St Pancras Conservation Areas, although the existing buildings are not within a conservation area and are not identified as heritage assets. A number of properties on Royal College Street and Pratt Street are Grade II listed. To mitigate this criterion 6 states that development must be designed to sensitively respond to the adjacent conservation areas and heritage assets.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S7 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- Water supply. 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.

In addition to the above criteria Policy S7 also sets out other site specific requirements relating to design and layout; delivery of development; intensification of employment uses; provision of homes; integration with the surrounding area; meeting housing need; active frontages; green infrastructure; tall buildings; improvements to cycle ways; contributions to a new canal crossing; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy S7 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

The Camden Building Height Study (EB34) identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 42m considered the potentially appropriate height range. The acceptability of tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk to flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 11% of the site identified at medium/high risk of surface water flooding. The site is also within a Local Flood Risk Zone and evidence suggests the historic River Fleet flowed through the site. Furthermore, the site is in the 21 –40 category for sewer flooding incidents in this postcode area between 2013 –2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation S7 is located in close proximity to the Regent's Canal and King's Cross St Pancras Conservation Area. A number of properties on Royal College Street and Pratt Street are Grade II listed and locally listed. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2029/30 to 2033/34.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans³.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

³ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site and key stakeholder's comments.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2029/30 to 2033/34.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in multiple private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. Part of the site has planning permission. The remainder of the site is subject to current pre application discussions.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM15 and MM93.

Site Allocation S8 St Pancras Hospital

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S8 was identified through the Site Allocations Plan 2013, the London SHLAA, and the 2018 call for sites.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the King's Cross area as being central to this. Noting that this area has the potential to strengthen its role as a location for employment and business; and deliver a significant increase in the number, mix and affordability of homes; to enable the area to fully realise its potential and become a more distinctive, vibrant, and mixed urban neighbourhood.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the Site Allocations Plan 2013, the London SHLAA, and 2018 call for sites.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are health, permanent self-contained homes, education, employment (including research and knowledge-based uses, light industrial, maker spaces and offices).

The allocated uses reflect the fact that part of the site has planning permission (2020/4825/P) for a new purpose-built facility for Moorfields Eye Hospital, University College London and Moorfields Eye Charity.

The allocated uses proposed for the remainder of the site reflect the objectives set out in the Council's Canalside to Camley Steet SPD (LD49); the Council's priority for self-contained homes to meet housing need; and support for growth sectors including knowledge and creative based uses and maker spaces, given the location of the site in the Knowledge Quarter. The approach taken is also consistent with Policy DS1 Delivering healthy and sustainable communities Part A, which expects development to meet the needs for new homes and jobs and provide a mix of uses.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 200 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving commercial and residential uses has been modelled. Allocated capacity is based on the retention and extension of existing buildings, in addition to some new build development. A scenario involving full demolition was not assessed due to the presence of significant heritage assets both within and adjacent to the site. However, any application involving the substantial

demolition of an existing building/s will need to demonstrate compliance with Policy CC2 Retention of Existing Buildings, including consideration of whether the specific scheme proposed would constitute the best use of the site. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the health, education or employment use is included in the allocation. However given the location of the site in the Knowledge Quarter, it is considered justified to deliver a mix of uses here in line with Policy DS1.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S8 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Flood risk. Here the policy states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding.
- The site is within the St Pancras Gardens sub-area of the King's Cross St. Pancras Conservation Area and adjacent to St Pancras Old Church Garden, which is a designated heritage asset and Grade 2 Site of Importance for Nature Conservation. Here, criterion 4 states that development must be designed to conserve or enhance existing heritage assets, including building, spaces and the adjacent St Pancras Gardens, recognising their contribution to the character of the conservation area, and seek to retain and restore buildings that make a positive contribution in accordance with Policy D5 (Historic Environment).
- The site is adjacent to the Regent's Canal and Regents Canal conservation area. Here criterion 10 states that development must incorporate measures to manage

the effects of lighting on the Canal to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.

- Water supply. 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.
- Viewing corridors. London View Management Framework view crosses part of the site, identified in the Mayor's SPG. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.

In addition to the above criteria Policy S8 also sets out other site specific requirements relating to site design and layout; the delivery of development; provision of housing; active frontages; routes and access; open space and landscaping; building heights; contributions to a new canal crossing; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy S8 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

The Camden Building Height Study (EB34) identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 45 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk to flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 10% of the site identified at medium/high risk of surface water flooding. The site is also within a Local Flood Risk Zone and evidence suggests the historic River Fleet flowed through the site. The site is in the 21 –40 category for sewer flooding incidents in this postcode area between 2013 –2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition. The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan.

It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S8 is within King's Cross St Pancras Conservation Area. The site is next to a Registered Garden 'St Pancras Gardens' which contains Grade II*, Grade II, and Grade I listed structures. The site is within and next to an Archaeological Priority Area (St Pancras Old Church and Burial Ground, Tier II). Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2030/31 to 2031/32.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁴.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

⁴ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site and key stakeholders' comments.

The infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2030/31 to 2031/32.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in public ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. Part of the site has planning permission and is under construction. The remainder of the site is subject to ongoing pre application discussions.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM16, MM17 and MM86.

Site Allocation S9 Shorebase Access

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S9 was identified through the 2018 call for sites.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land submitted through the 2018 call for sites.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, and student accommodation and offices.

This site is allocated to deliver mixed use development in line with Policy DS1. This is consistent with the character of the area and its location in the CAZ.

Although relatively small in scale, the allocation seeks to optimise the potential of the site, to deliver a housing-led mixed-use scheme, to help meet Camden's identified housing need.

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 41 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site a scheme involving residential uses was modelled. The site is already cleared, and the capacity work has been undertaken on this basis. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the office use is included in the allocation. However given the location of the site in the CAZ it is considered justified to deliver a mix of uses here in line with Policy DS1.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S9 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- The site is within the St Pancras Gardens sub-area of the King's Cross St. Pancras Conservation Area and adjacent to St Pancras Old Church Garden, which is a designated heritage asset and Grade 2 Site of Importance for Nature Conservation. To mitigate any impact criterion 4 states that development must respect the setting and views of the listed St Pancras Old Church and St Pancras Gardens; and criterion 5 states that development must retain and enhance the green buffer at the northern end of the site through the provision of new trees and planting, to help preserve and enhance the tranquil nature of the listed St Pancras Old Church and St Pancras Gardens.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S9 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- Water supply. 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.

In addition to the above criteria Policy S9 also sets out other site specific requirements relating to housing provision; agent of change; active frontages; and maintaining access to the logistics facility access.

It is considered that the site specific requirements set out in Policy S9 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 40% of the site identified at medium/high risk of surface water flooding. The site is also in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate. This site has been identified as being in an area of poor air quality which needs consideration through the planning application process. Given this, an additional criterion has been added to the site allocation policy in relation to air quality.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation S9 is within the King's Cross and St Pancras Conservation Area. The site is in close proximity to the Grade II* St Pancras Old Church and Grade II listed church gardens. The site is within an Archaeological Priority Area (St Pancras Old Church and Burial Ground, Tier II). Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2032/33.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁵.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden

⁵ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2032/33.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in single private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site came forward as part of the call for sites process.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM18 and MM87.

Site Allocation S10 Bangor Wharf and Eagle Wharf

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S10 was identified through the Site Allocation Plan 2013 (existing allocation), the London SHLAA 2017 and a call for sites.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the Site Allocations Plan 2013, the London SHLAA and the call for sites.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

Representations were received from the site promoter for Bangor Wharf at Regulation 19 stage to state that the allocation should be separated into two separate site allocations, reflecting the fact that they are in separate ownerships.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, and employment.

This site is allocated to deliver mixed use development in line with Policy H2 and Policy DS1. Given the current use of the site (offices, studios and storage), the fact that it is located in a predominantly residential area, and the need to maximise housing supply in Camden, these uses are considered justified.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 50 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in

Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving commercial and residential uses has been modelled. Allocated capacity is based on the retention and extension of existing buildings, in addition to some new build development. A scenario involving full demolition was not assessed due to the presence of heritage constraints on this site. However, any application involving the substantial demolition of an existing building/s will need to demonstrate compliance with Policy CC2 Retention of Existing Buildings, including consideration of whether the specific scheme proposed would constitute the best use of the site. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the employment use is included in the allocation. However given the existing use of the site and its location in the Knowledge Quarter, it is considered justified to deliver a mix of uses here in line with Policy DS1 and H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S10 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- The site is within the Regent's Canal Conservation Area and the Conservation Area Appraisal and Management Strategy identifies the former forage warehouse at Eagle Wharf and former dock as positive contributors. Here, criterion 4 states that development must retain and enhance the wharf building at Eagle Wharf; criterion 8 states that development must be of a form and scale which is appropriate to the Regent's Canal Conservation Area, and responds to the open

character of this part of the Canal and to surrounding listed buildings, and respects the amenity of neighbouring residents; and criterion 13 states that development must retain or reuse (on site) the granite setts at Bangor Wharf.

- The site is immediately adjacent to the Regent's Canal (Grand Union Canal), which is a designated Site of Importance for Nature Conservation (SINC), open space, and Green Corridor. Here, criterion 11 states that development must contribute to improvements in the biodiversity of the Canal, which is designated as a Site of Importance for Nature Conservation; and criterion 12 states that development must incorporate measures to manage the effects of lighting on the Canal to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.
- Flood risk. Here the policy states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding.
- The 'other considerations' section of the policy recognises there is a critical trunk sewer running through this site which would need to be appropriately considered through the planning and design stage.

In addition to the above criteria Policy S10 also sets out other site specific requirements relating to site design and layout; delivery of development; provision of housing; managing potential conflicts between uses; provision of flexible employment space; active frontages; the relationship between the site and the adjacent canal; canal moorings; and retention of existing buildings.

It is considered that the site specific requirements set out in Policy S10 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any

measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 8% of the site identified at medium/high risk of surface water flooding. The site is also in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation S10 is within the Regent's Canal Conservation Area. The site is near a terrace of Grade II listed buildings and locally listed buildings on Royal College Street. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2032/33.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁶.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

⁶ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site and key stakeholder's comments.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2032/33.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in multiple private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The sites came forward as part of a call for sites. The owners of Bangor Wharf have also submitted a response to the Regulation 19 consultation.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S11 Former Royal National Throat, Nose and Ear Hospital

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S11 was identified through the 2018 call for sites.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land submitted through the 2018 call for sites and planning application 2020/5593/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses include employment (including research and knowledge-based uses) and permanent self-contained homes.

This site is allocated to deliver mixed use development in line with Policy DS1 and Policy H2. This is consistent with the character of the area and its location in the CAZ.

The allocation also seeks to make the optimal use of the site to contribute towards meeting Camden's need for housing, in line with Policy H1.

The allocated uses also reflect that planning permission has been granted for a mixed-use office development with lab-enabled floors, self-contained residential homes and a hotel with gym and restaurant use (2020/5593/P).

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 72 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the employment uses is included in the allocation. However given the location of the site in the CAZ, it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage

policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S11 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. Site is within the King's Cross Conservation Area and the Bloomsbury Conservation Area is in close proximity. To mitigate any impact criterion 1 states that development must be informed by a robust understanding of the context of the site and the merits of existing buildings and collections of buildings. Given the historic context of the site and its contribution to the wider conservation area, proposals for demolition / extension or redevelopment of buildings and collections of buildings must be clearly justified, and new development must be designed in a way that respects the character of the original buildings, their setting and the site as a whole.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S11 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- Water supply. 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.
- Viewing corridors. Site is within two London View Management Framework corridors, identified in the Mayor's SPG. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.

In addition to the above criteria Policy S11 also sets out other site specific requirements relating to routes and permeability; open space; tall buildings; the need to protect the functioning of the ear institute; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy S11 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation S11 is within the King's Cross St Pancras Conservation Area, the Bloomsbury Conservation Area is located on the opposite side of Swinton Street to the south. A Grade II listed building is within the site on Wicklow Street, and terrace of Grade II listed buildings on Swinton Street. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2035/36 to 2036/37 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with

its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁷.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects an existing planning consent.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

⁷ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2035/36 to 2036/37 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in single private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. Planning permission has been granted for the development of this site.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM19 and MM94.

Site Allocation S12 Belgrove House

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S12 was identified through the 2018 call for sites and a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land submitted in the 2018 call for sites and identified in planning application 2020/3881/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are research and knowledge-based uses (including offices) and permanent self-contained homes.

This site is allocated to deliver mixed use development in line with Policy DS1 and Policy H2. This is consistent with the character of the area and its location in the CAZ.

The allocation also seeks to make the optimal use of the site to contribute towards meeting Camden's need for housing, in line with Policy H1.

The allocated uses reflect the planning permission that has been granted (2020/3881/P) for a commercial scheme with off-site housing delivery expected on Acorn House nearby. The site is under construction.

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 32 additional homes (to be delivered offsite). This reflects the planning permission granted for the site. No estimated floorspace for the research and knowledge based use is included in the allocation. However given the location of the site in the CAZ, it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S12 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The site is within the King's Cross Conservation Area adjacent to the Bloomsbury Conservation Area and surrounded by a number of listed buildings, including King's Cross Station and St Pancras Station, which are Grade I listed. In addition, the site is adjacent to Argyle Square which is protected under the London Squares Preservation Act 1931. To mitigate any impact criterion 2 states that development must be of an exceptional standard of architecture, to enhance the setting of the area's rich character, heritage assets, including the Grade I

stations, and open spaces; and criterion 4 states that development must improve the site's relationship with Argyle Square.

- The site is covered by the Crossrail 2 Safeguarding Direction – Site of surface interest. Any future planning applications should be referred to Transport for London for comment.

In addition to the above criteria Policy S12 also sets out other site specific requirements relating to the delivery of a mixed-use scheme; connectivity and active streets; design; the integration of a step-free London Underground entrance; delivery of community benefits; public realm and highways improvements; tall buildings; and the delivery of a pedestrian crossing across Euston Rd.

It is considered that the site specific requirements set out in Policy S12 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S12 is within the King’s Cross St Pancras Conservation Area, adjacent to the Bloomsbury Conservation Area. The site is near Grade II listed buildings, including King’s Cross Station and St Pancras Station, which are Grade I listed.

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is under construction, with completion expected in 2026.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with

its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁸.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects an existing planning consent.

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

This site is under construction and is expected to complete in 2026. Any infrastructure that has been secured through the planning application / legal agreements has been provided as part of the development of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

⁸ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in single private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. Planning permission has been granted and construction is almost complete. The off-site housing provision required has been delivered.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S13 Former Thameslink Station, Pentonville Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S13 was identified through the 2018 call for sites.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land submitted through the 2018 call for sites.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

A representation was received at Regulation 19 stage from Places for London in respect of the boundary of the site. They questioned why the site boundary had been reduced since Regulation 18 stage and stated that "the removal of 366 Gray's Inn

Road and the Thameslink and Metropolitan Line tracks removes the potential to bring forward a more comprehensive decked development and would be sub-optimal.”

The Council considers that the boundary of the site is justified given that insufficient information has been provided by the site promoter to determine whether the development of the wider site (particularly the air space over live tracks) is deliverable or viable. The allocation of the site in the plan does not prevent the further development of the site however, if it is demonstrated to be viable.

d. The uses to be permitted and how they are justified

The allocated uses are employment (including research and knowledge-based uses, maker spaces, offices), and permanent self-contained homes.

This site is allocated to deliver mixed use development in line with Policy DS1 and Policy H2. This is consistent with the character of the area and its location in the CAZ.

The allocation also seeks to make the optimal use of the site to contribute towards meeting Camden’s need for housing, in line with Policy H1.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 22 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving commercial and residential uses has been modelled. As the existing structure on site is a single storey low quality building, which is unlikely to be suitable for extension, it is considered that a scheme involving demolition on this site has the potential to provide benefits substantially greater than those that could be realised through the retention of the existing building. However,

any application involving the substantial demolition of an existing building/s will need to demonstrate compliance with Policy CC2 Retention of Existing Buildings, including consideration of whether the specific scheme proposed would constitute the best use of the site. No estimated floorspace for the employment use is included in the allocation. However given the location of the site in the CAZ, it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S13 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The site is within the King's Cross Conservation Area. The adjacent Scala building is also a valued music venue and identified as a positive contributor to the conservation area. Furthermore the Big Chill House, 259 Pentonville Road, adjacent to the site is Grade II listed. To mitigate any impact criterion 4 states that development must be designed to respect the adjacent listed building and the Scala building, as a positive contributor to the conservation area, and should respond positively to the character of St Chad's Place and Wicklow Street.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S13 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.

- Viewing corridors. Site is within two London View Management Framework corridors, identified in the Mayor's SPG. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.

In addition to the above criteria Policy S13 also sets out other site specific requirements relating to design; provision of a mix of uses; amenity; the continuing operation of adjacent venues; active frontages; potential need to retain the station entrance; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy S13 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that 60% of the site is identified at high risk of surface water flooding. The site is also located in a Local Flood Risk Zone. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk),

to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate. This site has been identified as being in an area of poor air quality which needs consideration through the planning application process. Given this, an additional criterion has been added to the site allocation policy in relation to air quality.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S13 is within the King’s Cross St Pancras Conservation Area. The site is adjacent to a Grade II listed building. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2031/32.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with

its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁹.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the

⁹ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2031/32.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in public ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site came forward as part of a call for sites, and the owners have responded to the public consultations on the Local Plan and indicated that they are preparing a development scheme for pre application discussion.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S14 Land at Pakenham Street and Wren Street

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S14 was identified through the Site Allocation Plan 2013 (existing allocation).

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the Site Allocations Plan 2013.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are education and / or employment uses (including research and knowledge-based uses, maker space and offices) and permanent self-contained homes.

The site is currently occupied by a number of small businesses. However the wider surrounding area is heavily built up and contains a mix of uses including retail and hotels, reflecting its location in the CAZ.

Major development is also taking place opposite the site at the Mount Pleasant Sorting Office and to the west at the Eastman Dental Hospital site.

The site was previously identified in the Camden Site Allocations Plan 2013, as a potential location for a new secondary school. However at the time of writing the Local Plan, the most recent pupil place projections for Camden indicate that there is no current need for a new secondary school at this location. Pupil place projections figures will, however, be kept under review.

Given the current use of the site, its location and the need to optimise the use of the site to deliver additional homes, to help meet Camden's identified housing need, the allocated uses are considered justified.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 70 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving employment and residential uses has been modelled. Allocated capacity is based on the retention and extension of existing buildings. A scenario involving full demolition was not assessed due to on-site heritage constraints. However, any application involving the substantial demolition of an existing building/s will need to demonstrate compliance with Policy CC2 Retention of Existing Buildings, including consideration of whether the specific scheme proposed would constitute the best use of the site. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the employment use is included in the allocation. However given the existing use of the site and its location in the CAZ, it is considered justified to deliver a mix of uses here in line with Policy DS1.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S14 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- The Bloomsbury Conservation Area is immediately to the south and east of the site. 23 – 24 Pakenham Street, 21 Wren Street and the boundary wall are locally listed and considered to be of architectural, historical and townscape significance. To mitigate this criterion 2 states that development must be informed by a robust understanding of the historic context of the site and the merits of its existing buildings, including 23 – 24 Pakenham Street, 21 Wren Street and the boundary wall; and criterion 3 states that development must respond to the architectural quality of the adjacent historic terraces on Wren Street and Pakenham Street.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S14 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- This site is within the Secondary A Aquifer. Policy NE4 Water Quality sets out the Council approach to protecting water quality. This should ensure any impact is mitigated.
- Viewing corridors. Site is within London View Management Framework corridor, identified in the Mayor's SPG. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.

In addition to the above criteria Policy S14 also sets out other site specific requirements relating to the use of the site for educational purposes; access and permeability; improvements to pedestrian and cycling routes and public realm; and retention of existing buildings.

It is considered that the site specific requirements set out in Policy S14 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out

in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 4% of the site identified at medium/high risk of surface water flooding. Evidence suggests there is potential for groundwater flooding to occur at the surface. The site is also in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation S14 is next to Bloomsbury Conservation Area, to the south and east of the site. There are Grade II listed terraces on Wren Street, 23 – 24 Pakenham Street, 21 Wren Street and the boundary wall are locally listed and considered to be of architectural, historical and townscape significance. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2033/34 to 2034/35

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹⁰.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

¹⁰ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2033/34 to 2034/35.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in single Council ownership.

The Council is not aware that land assembly is required to take this site forward.

The development of this site is being taken forward by the Council's Community Investment Team.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S15 Land to the rear of the British Library

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S15 was identified through the Site Allocation Local Plan 2013 (existing allocation), the 2018 call for sites and a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new cultural facilities and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the Site Allocations Plan 2013, submitted through the 2018 call for sites, and planning application and listed building consent 2022/1041/P and 2022/1320/L.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are cultural, research and knowledge-based uses and permanent self-contained homes.

This site is allocated to deliver mixed use development in line with Policy DS1 and Policy H2. This is consistent with the existing use of the site, the character of the area and its location in the CAZ and Knowledge Quarter.

The allocated uses also reflect the planning permission and listed building consent (2022/1041/P, 2022/1320/L) for a new building for use as a library, galleries, learning, business and events space, and retail and commercial spaces. A payment in lieu of on-site housing provision was also secured as part of the application. This is being used to deliver affordable housing as part of the Council's Central Sommers Town Scheme.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

N/A

f. For employment proposals, the estimated floorspace and whether it is justified

No estimated floorspace for the cultural, research and knowledge-based uses is included in the allocation. However given the existing use of the site, and its location in the CAZ / Knowledge Quarter, it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The policy reflects the fact that a payment in lieu of on-site housing provision was secured as part of the application. This is being used to deliver affordable housing as part of the Council's Central Sommers Town Scheme.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S15 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The main Library is Grade I listed, and the Library Centre for Conservation is a non-designated heritage asset. The site is also adjacent to a Grade I listed building. To mitigate this criterion 3 states that development must be of exceptional design quality reflecting the site's important location and historic context. Appropriate consideration should be given to the impact of development on existing buildings on the site and any adverse impacts on the Grade I listed British Library should be avoided.
- Site is within area safeguarded for Crossrail 2 and area of surface interest. Proposed development should be referred to TfL for comment.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S15 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.

In addition to the above criteria Policy S15 also sets out other site specific requirements relating to design, access and permeability; community provision; green infrastructure; and retention of existing buildings.

It is considered that the site specific requirements set out in Policy S15 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the

scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk to flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation S15 is next to Kings Cross St Pancras Conservation Area. The main Library is Grade I listed, with Grade II listed estate on Ossulston Street.

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

This site is not phased in the Council's housing trajectory (SD14) as no housing is being provided on-site. The site has planning permission and is expected to come forward in the Plan period.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects an existing planning consent.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The site is expected to come forward over the plan period. As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in single private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has an approved planning permission.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM95.

Site Allocation S16 Former Central St Martins College

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S16 was identified through the Site Allocation Plan 2013 (existing site allocation), the London SHLAA 2017 and the 2018 call for sites.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. It identifies the delivery of development in the Holborn area as being central to this and notes that development around Holborn has the potential to strengthen the area's role as a location for business, supported by the enhanced access brought by the Elizabeth Line. Development here will create more vibrant and better connected neighbourhoods in the heart of central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and much-needed new self-contained homes.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the Site Allocations Plan 2013, the London SHLAA, the 2018 call for sites and planning application 2020/2470/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and student accommodation, hotel, cultural, retail, creative workspace.

The site is formerly occupied by the Central St Martins College (University of the Arts) and home to the Grade II* listed Lethaby Building.

The allocation seeks to deliver the mixed use development of this site in line with Policy DS1 and Policy H2, reflecting the character of the area, the sites existing use, and the need to make optimal use of the site to deliver residential development to contribute towards meeting Camden's need for housing.

The allocated uses reflect the planning permission (2020/2470/P) and listed building consent that has been granted for a hotel, self-contained homes, maker space and cultural and retail uses.

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 34 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the hotel, cultural, retail or creative workspace is included in the allocation. However given the location of the site in the Central Activities Zone, it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S16 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. Part of the site is within the Kingsway Conservation Area (west) and part is within the Bloomsbury Conservation Area (east). The site is also occupied by the Grade II* listed Lethaby building. Given this, criterion 1 states that development must retain the Grade II* listed Lethaby Building, ensuring that its fabric and setting are protected and, where appropriate, enhanced to better reveal its heritage significance, and establish an appropriate and viable use to ensure the building's long-term future. Criteria 5 states that development must ensure any new buildings, and extensions to existing buildings, are of exceptional architectural quality to respond to the site's sensitive and varied context and range of interfaces, particularly Red Lion Square and the Lethaby Building. Whilst criteria 6 states that development must ensure the height of any proposal is sensitive to the surrounding townscape, conservation areas and listed buildings, in particular the Lethaby building. Any additional height, scale or massing to the current building on Red Lion Square would need to be sufficiently justified and articulated.
- Site is within a Tier II Archaeological Priority Area. Policy D5 Historic environment Parts N, O and P set out the Council's approach to protecting remains, preserving their setting, reporting and archiving. This should ensure any impact is mitigated.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S16 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- This site is within the Secondary A Aquifer. Policy NE4 Water Quality sets out the Council approach to protecting water quality. This should ensure any impact is mitigated.

In addition to the above criteria Policy S16 also sets out other site specific requirements relating to the delivery of a mix of uses; housing provision; cultural use; new pedestrian routes; active frontages; independent retailers; public realm improvements; tall buildings; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy S16 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air

Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation S16 is located within the Kingsway Conservation Area and the eastern part of the site sits opposite the Bloomsbury Conservation Area. The Lethaby Building was built as the Central School of Arts and Crafts and is Grade II* listed. The site is within an Archaeological Priority Area (London Suburbs, Tier II).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2028/29 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹¹.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

¹¹ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects an existing planning consent.

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions has been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2028/29 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in single private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has planning permission.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM20.

Site Allocation S17 Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S17 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified through discussions with the landowner and planning colleagues. The boundary was altered following consultation on the Regulation 18 draft Plan to reflect the site boundary of the planning application (2023/2510/P).

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are mixed-use including offices, research and knowledge-based uses, town centre uses, and permanent self-contained homes.

The existing site comprises a number of elements, including a Travelodge hotel, a multi-storey car park, and a number of buildings, some of which Grade II listed. Part of the site is vacant. Previous uses of the site include retail use, offices, 31 HMOs at upper floor levels and a nightclub that ceased operating in 2011.

The allocation seeks to deliver the mixed use development of this site in line with Policy DS1 and Policy H2, reflecting the character of the area, the sites existing use, and the need to make optimal use of the site to deliver residential development to contribute towards meeting Camden's need for housing.

The allocated uses also reflect the planning permission (2023/2510/P) and listed building consent that have been granted for a mixed-use scheme including offices, town centre uses, and self-contained homes.

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 12 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the offices, research and knowledge based use and town centre use is included in the allocation. However given the location of the site in the Central Activities Zone and the existing use, it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S17 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The site is part within the Bloomsbury Conservation Area, with several listed buildings in close proximity. To mitigate any impact criterion 1 states that development must be designed to respond to the site's varied context, taking into account the listed buildings, the setting of heritage assets, and views to and from Bloomsbury Conservation Area.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S17 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- Site is within a Tier II Archaeological Priority Area. Policy D5 Historic environment Parts N, O and P set out the Council's approach to protecting remains, preserving their setting, reporting and archiving. This should ensure any impact is mitigated.

- This site is within the Secondary A Aquifer. Policy NE4 Water Quality sets out the Council approach to protecting water quality. This should ensure any impact is mitigated.
- Viewing corridors. Site is within London View Management Framework protected background view, identified in the Mayor's SPG. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.

In addition to the above criteria Policy S17 also sets out other site specific requirements relating to housing provision; ground floor uses; routes and access; removal of on-site parking; trees; tall buildings; public realm improvements; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy S17 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

The Camden Building Heights Study (EB34) has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 54m considered the potentially appropriate height range. The Council has granted planning permission for a development of up to 74m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings), other relevant development plan policies and the London View Management Framework.

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S17 is located within the Bloomsbury Conservation Area. 10-12 Museum Street and 35 and 37 New Oxford Street are Grade II listed buildings, with other Grade II listed buildings adjacent. The site is within an Archaeological Priority Area (London Suburbs, Tier II).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning

application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2029/30 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹².

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required. Criterion 5 of the policy also states that development must remove existing on-site car parking, in line with the car free approach set out in Policy T5 (Parking).

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

¹² That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The infrastructure identified is considered necessary to support the delivery of the site and reflects an existing planning consent.

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2029/30 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in multiple private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has planning permission.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S18 135 – 149 Shaftesbury Avenue

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S18 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new cultural facilities in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2024/0993/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are theatre / cinema, cultural use. This reflects the existing use of the site and the character of the area. A contribution to the delivery of housing off-site will also be expected having regard to relevant Local Plan policies, including Policy H2.

Planning permission has now been granted for a theatre, bar / restaurant and hotel use on this site (2024/0993/P).

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

N/A

f. For employment proposals, the estimated floorspace and whether it is justified

No estimated floorspace for theatre/ cinema, cultural use is included in the allocation. However, given the existing use of the site and the character of the area, a theatre/ cinema, cultural use is considered justified here in line with Policy SC6.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

N/A

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S18 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- **Heritage.** The existing building on the site is Grade II listed. The site is also adjacent to both the Seven Dials (Covent Garden) and Denmark Street Conservation Areas. Given this, criterion 1 states that development must retain the Grade II listed building and ensure that its fabric and setting are protected and, where appropriate, enhanced, particularly the building's distinctive features. A full assessment of the remaining internal historic fabric of the building should be undertaken prior to the submission of a planning application. With criterion 6 stating that development must ensure that where an upward extension is proposed, this is of the highest architectural quality to complement and enhance the Grade II listed host building, is of a height and massing that is appropriate to the site's surrounding townscape, and responds to the neighbouring conservation areas.
- **Flood risk.** As the site is within an area identified by the Council as being at risk of flooding Policy S18 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- **Site is within a Tier II Archaeological Priority Area.** Policy D5 Historic environment Parts N, O and P set out the Council's approach to protecting remains, preserving their setting, reporting and archiving. This should ensure any impact is mitigated.

- This site is within the Secondary A Aquifer. Policy NE4 Water Quality sets out the Council approach to protecting water quality. This should ensure any impact is mitigated.

In addition to the above criteria Policy S18 also sets out other site specific requirements relating to the retention of the cinema/ theatre use; design; alternative cultural uses; entrances; creation of active frontages; public realm improvements; safe and healthy streets; and the protection of the Phoenix Gardens.

It is considered that the site specific requirements set out in Policy S18 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at high risk of surface water flooding. There is also potential for groundwater flooding of property situated below ground level and potential for groundwater flooding to occur at surface. Given this, a criteria has been added to the policy to state that a flood risk assessment will be required in accordance with Policy

CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S18 adjoins the Seven Dials (Covent Garden) Conservation Area, and the Denmark Street Conservation Area. The building at 135-149 Shaftesbury Avenue is Grade II listed. The site is within an Archaeological Priority Area (London Suburbs, Tier II).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). As this site is not allocated for the delivery of housing, it has not been included in the housing trajectory.

As this site has planning permission, it is considered that it will be delivered within the Plan period.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects an existing planning consent.

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

This site is expected to come forward over the Plan period. As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has a recent approved planning permission.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S19 Cockpit Yard and Holborn Library

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation S19 was identified through the London SHLAA 2017 and discussions with the Council's Community Investment Programme Team.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. It identifies the delivery of development in the Holborn area as being central to this and notes that development around Holborn has the potential to strengthen the area's role as a location for business, supported by the enhanced access brought by the Elizabeth Line. Development here will create more vibrant and better connected neighbourhoods in the heart of central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and much-needed new self-contained homes.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the London SHLAA, and engagement with the Council's Community Investment Programme Team.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are employment (including creative and maker spaces and affordable workspace), permanent self-contained homes, library and depot.

The site contains several buildings including Holborn Library, ground floor retail (40-46 Theobalds Road), a Council street cleaning depot, and workshops occupied by the Cockpits Arts organisation.

The allocation seeks to ensure the retention and reprovision of the library and archive and Council depot functions as well as the reprovision of specialist and affordable creative and maker spaces and flexible space suitable for a range of additional employment uses in accordance with Policy IE4.

In addition to the employment and library use the allocation seeks to optimise the provision of additional homes on the site, to help meet identified need.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 73 additional homes. The capacity for this site is based on a design-led assessment and the approach taken is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving commercial and residential uses has been modelled. Allocated capacity is based on the retention and extension of existing buildings. A scenario involving full demolition was not assessed due to a number of buildings on site being identified as positive contributors to the Conservation Area. However, any application involving the substantial demolition will need to demonstrate compliance with Policy CC2 Retention of Existing Buildings, including consideration of whether the specific scheme proposed would constitute the best use

of the site. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the employment, library or depot use is included in the allocation. However given the location of the site in the Central Activities Zone and the existing use, it is considered justified to deliver a mix of uses here in line with Policy DS1.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S19 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. Site is within the Bloomsbury Conservation Area, and adjacent to a Grade II* listed building. To mitigate any impact criterion 6 states that development must be designed to respond to the site's varied context, taking into account heritage assets and the surrounding townscape, to ensure that development does not negatively impact on the Bloomsbury Conservation Area, or the listed buildings adjacent to the site.
- London View Management Framework. Site is within several protected views. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy S19 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.

- This site is within the Secondary A Aquifer. Policy NE4 Water Quality sets out the Council approach to protecting water quality. This should ensure any impact is mitigated.
- Site is within a Tier II Archaeological Priority Area. Policy D5 Historic environment Parts N, O and P set out the Council's approach to protecting remains, preserving their setting, reporting and archiving. This should ensure any impact is mitigated.

In addition to the above criteria Policy S19 also sets out other site specific requirements relating to the retention of the library, archive and Council depot; retention / reprovision of the specialist and affordable creative and maker spaces; employment uses; optimising housing delivery; design; active frontage; public realm improvements; and retention of existing buildings.

It is considered that the site specific requirements set out in Policy S19 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 25% of the site identified at medium/high risk of surface water flooding. There is also potential for groundwater flooding of property situated below ground level. Given this, a criteria has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood Risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S19 is located within the Bloomsbury Conservation Area. Adjoining the site to the west are Grade II* listed buildings on Great James Street, with Grade II listed buildings on Northington Street. The site is within an Archaeological Priority Area (London Suburbs, Tier II). Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 - Historic Environment.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2036/37 to 2037/38.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹³.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides

¹³ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2036/37 to 2037/38.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in Council ownership.

The Council is not aware that land assembly is required to take this site forward.

The development of this site is being taken forward by the Council's Community Investment Team as part of a wider regeneration strategy programme.

t. Any modifications that are necessary for reasons of soundness

No modifications are required for soundness.

Site Allocation S20 York Way Depot and adjacent land at Freight Lane

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation S20 was identified through the consultation on the draft Local Plan 2024.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment, infrastructure and a Gypsy and Traveller site in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

This is a Council owned site. The boundary reflects the extent of the Council's landownership and our understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, employment (including offices), depot and bus operations/ parking facility and accommodation for Gypsies and Travellers.

The allocation seeks to optimise the use of the site, currently in low density depot use, co-locating housing and employment. It promotes the provision of housing and gypsy and traveller accommodation to contribute towards meeting identified needs, intensified employment use, and other proposed uses, while ensuring that the introduction of non-employment uses does not compromise the operation of employment uses. Depot provision should be retained or re-provided as necessary, unless suitable compensatory provision is made elsewhere.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

Please see the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

Please see the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for the site is 210 additional homes. The capacity for this site is based on a design-led assessment and the approach taken to this is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

For this site, a scheme involving commercial and residential uses (including accommodation for Gypsy and Traveller provision) has been modelled. As the existing structures on site are low level, shed like structures which are unlikely to be suitable for extension, a scheme involving demolition on this site has the potential to provide benefits substantially greater than those that could be realised through the retention of the existing buildings. In this respect, compliance with Policy CC2 would be required.

The capacity of the site was also assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the employment use is included in the allocation. However given the location and existing use of the site, it is considered justified to deliver a mix of uses here in line with Policy DS1.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy S20 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Site is adjacent to a concrete batching plant and railway line. Criteria 6 of Policy S20 states that development must 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 in accordance with the Agent of Change principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity). Furthermore, criteria 11 and 12 of Policy S20 require the development to consider any impact on the railway and the continued operation of the aggregates transhipment facility.
- Site is adjacent to a Site of Importance for Nature Conservation (SINC) Grade I. Policy NE2 (Biodiversity) sets out the Council's approach to managing the impact of development on biodiversity in Camden. This should ensure any impact is mitigated.
- Part of the site is within two viewing corridors set out in the London View Management Framework SPG. Policy D1 states that development will be expected to preserve protected strategic views. This should ensure any impact is mitigated.
- Site is within a Tier II Archaeological Priority Area. Policy D5 Heritage Parts N, O and P set out the Council's approach to protecting remains, preserving their setting, reporting and archiving. This should ensure any impact is mitigated.
- Site is within the Secondary A Aquifer. Policy NE4 Water Quality sets out the Council approach to protecting water quality. This should ensure any impact is mitigated.

In addition to the above criteria Policy S20 also sets out other site specific requirements relating to intensifying employment floorspace; design; housing provision; provision of a Gypsy and Traveller site; provision of public open space; active travel; retention of the existing Council Depot; protection of the existing bus depot; and infrastructure provision.

The site specific requirements set out in Policy S20 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

The Camden Building Heights Study (EB34) identified this site as a location where tall buildings may be an appropriate form of development, with 15m – 56m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identified this site as having a low risk of surface water flooding.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

This site has been identified as being in an area of poor air quality which needs consideration through the planning application process. Given this, an additional criterion has been added to the site allocation policy in relation to air quality.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation S20 is not located within or near to a Conservation Area. There are no listed or locally buildings on or adjacent to the site.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2035/36 to 2039/40.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹⁴.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

¹⁴ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development here would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required. The site allocation also requires the development to seek to improve conditions for pedestrians and cyclists along Freight Lane.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified for this site is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

The infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2035/36 to 2039/40.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in Council ownership. The Council is not aware that land assembly is required to take this site forward.

The development of this site is being taken forward by the Council's Community Investment Team as part of a wider regeneration strategy programme.

t. Any modifications that are necessary for reasons of soundness

No modifications are required for soundness.

Site Allocation S21 Agar Grove Estate

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S21 was identified through the London SHLAA 2017 and a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. It notes that the Council is committed to a programme of estate renewal and regeneration delivered through its Community Investment Programme (CIP) and that the main focus of this work in the south of the borough is the Agar Grove Estate, north of Camley Street, and the Tybalds Estate in Holborn. It is considered that this site will contribute towards the delivery of the Council's spatial strategy in this area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the London SHLAA and planning applications 2013/8088/P, 2019/4280/P and 2022/2359/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated use is permanent self-contained homes.

The allocation supports the redevelopment of the existing Agar Grove housing estate and aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing.

Planning permissions 2013/8088/P, 2019/4280/P and 2022/2359/P granted permission for an uplift of 247 homes overall on the estate. The final homes are now under construction (with earlier phases complete).

The approach taken to allocated uses in the policy is consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 139 additional homes. This reflects remaining homes to be delivered from the planning permission which has been built out in phases.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

f. For employment proposals, the estimated floorspace and whether it is justified

N/A

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

N/A

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2027/28 and 2030/31 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹⁵.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

¹⁵ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No specific infrastructure is identified as being considered necessary to support the delivery of the site.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and has been provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2027/28 and 2030/31 of the Plan period.

As any infrastructure secured through the planning application process has been provided as part of the development of the site it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission and is under construction. The site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in Council ownership.

The Council is not aware that land assembly is required to take this site forward.

The development of this site is being taken forward by the Council's Community Investment Team. The site has been subject to various planning permissions and is partly completed. The final phase of homes is currently under construction.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S22 6 St Pancras Way

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site

including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S22 was identified through the London SHLAA 2017 and a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the King's Cross area as being central to this. Noting that this area has the potential to strengthen its role as a location for employment and business; and deliver a significant increase in the number, mix and affordability of homes; to enable the area to fully realise its potential and become a more distinctive, vibrant, and mixed urban neighbourhood.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the London SHLAA and planning application 2021/2671/P as amended by 2023/5041/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, employment, retail, and leisure.

The allocation seeks to deliver the mixed use development of this site in line with Policy DS1, reflecting the character of the area, the sites existing use, and the need to make optimal use of the site to deliver residential development to contribute towards meeting Camden's need for housing.

The uses reflect those permitted in planning permission 2021/2671/P as amended by 2023/5041/P which have been implemented. The site is currently under construction.

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 73 additional homes. This reflects the planning permissions granted for the site. No estimated floorspace for the employment, retail or leisure use is included in the allocation. However given the location and existing use of the site, it is considered justified to deliver a mix of uses here in line with Policy DS1.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on

allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is under construction and expected to complete in years 2026/27 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹⁶.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

¹⁶ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No specific infrastructure is identified as being considered necessary to support the delivery of the site.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and has been provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is under construction and expected to complete in years 2026/27 of the Plan period.

As any infrastructure secured through the planning application process has been provided as part of the development of the site it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission and is under construction. The site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has planning permission and is under construction.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S23 Tybalds Estate

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S23 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. It notes that the Council is committed to a programme of estate renewal and regeneration delivered through its Community Investment Programme (CIP) and that the main focus of this work in the south of the borough is the Agar Grove Estate, north of Camley Street, and the Tybalds Estate in Holborn. It is considered that this site will contribute towards the delivery of the Council's spatial strategy in this area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2021/3580/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated use is permanent self-contained homes. The indicative housing capacity is 56 additional homes.

The allocation supports the delivery of in-fill development at the existing Tybalds housing estate and aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing.

The allocated uses reflect planning permission 2021/3580/P which has been implemented and is under construction.

The approach taken to allocated uses in the policy is consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be

demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 139 additional homes. This reflects the planning permission granted for the site.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

f. For employment proposals, the estimated floorspace and whether it is justified

N/A

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

N/A

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk to flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is currently under-construction and expected to complete in years 2029/30 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹⁷.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of

¹⁷ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the existing planning consent.

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to complete in years 2029/30 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in Council ownership.

The Council is not aware that land assembly is required to take this site forward.

The development of this site is being taken forward by the Council's Community Investment Team. The site has planning permission and is under construction.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S24 294 – 295 High Holborn

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S24 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. It identifies the delivery of development in the Holborn area as being central to this and notes that development around Holborn has the potential to strengthen the area's role as a location for business, supported by the enhanced access brought by the Elizabeth Line. Development here will create more vibrant and better connected neighbourhoods in the heart of central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and much-needed new self-contained homes.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2017/1827/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and employment.

The allocation seeks to deliver the mixed use development of this site in line with Policy DS1 and Policy H2, reflecting the character of the area, the sites existing use, and the need to make optimal use of the site to deliver residential development to contribute towards meeting Camden's need for housing.

The uses reflect those in planning permission 2017/1827/P which has been implemented, with initial works commenced.

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 10 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the employment use is included in the allocation. However given the location and existing use of the site, it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to complete in years 2027/28 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with

its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹⁸.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the existing planning consent.

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

¹⁸ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to complete in years 2027/28 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has planning permission and construction has commenced.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S25 56 – 164 Gray’s Inn Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S25 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2015/6955/P (as amended by 2020/1368/P, 2021/1919/P and 2021/1056/P).

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and employment. The indicative housing capacity is 14 additional homes.

The allocation seeks to deliver the mixed use development of this site in line with Policy DS1 and Policy H2, reflecting the character of the area, the sites existing use, and the need to make optimal use of the site to deliver residential development to contribute towards meeting Camden's need for housing.

The uses reflect those in planning permission 2015/6955/P (as amended by 2020/1368/P, 2021/1919/P and 2021/1056/P) which has been implemented and is under construction.

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 14 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the employment use is included in the allocation. However given the location and existing use of the site, it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning

application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to complete in years 2027/28 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹⁹.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the existing planning consent.

¹⁹ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to complete in years 2027/28 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has planning permission and construction has commenced.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S26 8 – 10 Southampton Row

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site

including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S26 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. It identifies the delivery of development in the Holborn area as being central to this and notes that development around Holborn has the potential to strengthen the area's role as a location for business, supported by the enhanced access brought by the Elizabeth Line. Development here will create more vibrant and better connected neighbourhoods in the heart of central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and much-needed new self-contained homes.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2019/2536/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, and hotel.

The allocation seeks to deliver the mixed use development of this site in line with Policy DS1 and Policy H2, reflecting the character of the area, the sites existing use, and the need to make optimal use of the site to deliver residential development to contribute towards meeting Camden's need for housing.

The allocated uses reflect those in planning permission 2019/2536/P.

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 9 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the hotel use is included in the allocation. However it is considered justified to deliver a mix of uses here in line with Policy DS1 and Policy H2.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on

allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2033/34 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans²⁰.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

²⁰ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects an existing planning consent.

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2033/34 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has planning permission.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S27 Middlesex Hospital Annex

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S27 was identified through the Fitzrovia Area Action Plan, the London SHLAA 2017 and a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, employment and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the Fitzrovia Area Action Plan, the London SHLAA, and planning application 2017/0414/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and health uses.

The allocation seeks to deliver the mixed use development of this site in line with Policy DS1, reflecting the character of the area, the sites existing use, and the need to make optimal use of the site to deliver residential development to contribute towards meeting Camden's need for housing.

The allocated uses reflect planning permission 2017/0414/P, which has been implemented and is under construction.

The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 57 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the health use is included in the allocation. However it is considered justified to deliver a mix of uses here in line with Policy DS1.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). The site is under construction and completion is expected by May 2026, given this it is not included in the housing trajectory.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the existing planning consent.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and has been provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is currently under construction and forecast to complete in May 2026. Given this, it has not been included in the housing trajectory.

As any infrastructure secured through the planning application process has been provided as part of the development of the site it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in public ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has planning permission, and construction is at an advanced stage, with completion expected in May 2026.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S28 Central Sommers Town

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S28 was identified through discussions with the Council's Community Investment Partnership Team.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and infrastructure in accordance with Policy S1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified through the Council's Community Investment Programme and subsequent planning application 2015/2704/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and community uses.

The allocation supports development in the Central Sommers Town area and seeks to optimise residential use to contribute towards meeting Camden's need for housing. The delivery of community uses is also considered acceptable here, to support the delivery of new homes in line with Policy DS1 and Policy SC3.

The allocated uses reflect the planning permission 2015/2704/P and the site is currently under construction.

The approach taken to allocated uses in the policy is consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 38 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the community use is included in the allocation. However the delivery of community uses here is considered justified in line with Policy DS1 and Policy SC3.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on

allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to be completed in years 2029/30 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans²¹.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

²¹ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the existing planning consent.

This site is benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to complete in years 2029/30 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission and is under construction. The site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in Council ownership.

The Council is not aware that land assembly is required to take this site forward.

The development of this site is being taken forward by the Councils Community Investment Team. The site has been subject to a number of planning permissions

and is being taken forward in phases, with earlier phases already complete. The final phase is under construction.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S29 Chalton Street, Godwin and Crowndale Estate

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S29 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S1 South Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, health uses and infrastructure in accordance with Policy S1, contributing to the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2020/3801/P

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and health uses.

The allocation supports development in the Godwin and Crowndale estate and seeks to optimise residential use to contribute towards meeting Camden's need for housing. The delivery of health uses is also considered acceptable here, to support the delivery of new homes, in line with Policy DS1 and Policy SC3.

The allocated uses reflect the planning permission 2020/3801/P for this site.

The approach taken to allocated uses in the policy is consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

The approach taken to estimating the indicative housing capacities for site allocations is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

The indicative housing capacity for this site is 10 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the community use is included in the allocation. However the delivery of health uses here is considered justified in line with Policy DS1 and Policy SC3.

The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). The site is under construction and completion is expected by April 2026. The site is therefore not included in the housing trajectory.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the existing planning consent.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and has been provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is currently under construction and forecast to complete in April 2026. Given this, it has not been included in the housing trajectory.

As any infrastructure secured through the planning application process has been provided as part of the development of the site it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in Council ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in the site. The site has planning permission, and construction is at an advanced stage, with completion expected in April 2026.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation Policy S30 Birkbeck College, Mallet Street

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S30 was identified through a review of pre-applications.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S4 Bloomsbury Campus Area sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver higher education uses (academic and ancillary space) in accordance with Policy S4, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are higher education (academic and ancillary space). This is consistent with Policy S4 (Bloomsbury Campus Area) and considered appropriate given the location of the site.

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

N/A

f. For employment proposals, the estimated floorspace and whether it is justified

No estimated floorspace for higher education (academic and ancillary space) use is included in the allocation. However, given the sites location in the Bloomsbury Campus Area, the proposed use is considered justified as it is in accordance with Policy S4.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

N/A

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

The key considerations in the policy note that this site is within a Secondary A Aquifer. As any application for development on this site will be considered against Policy S4 Bloomsbury Campus Area and the other policies in the Local Plan no further site specific requirements have been included in the policy.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with

3% of the site identified at medium/high risk of surface water flooding. There is also limited potential for ground water flooding.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S30 is located within Bloomsbury Conservation Area. There are Grade II listed buildings near the site on Malet Street and Byng Place, and Grade II* listed building Senate House. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 (Historic Environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

As this site has not been allocated for the delivery of housing it is not phased in the Council’s housing trajectory (SD14). The owners of the site have confirmed that they expect development on this site to come forward in the Plan period.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of

people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No infrastructure is identified as being considered necessary to support the delivery of the site. If any infrastructure is required to support the delivery of this site, this will be secured through the planning application process and legal agreements.

If infrastructure is identified as being required through the planning application process, then it is unlikely that this would be required to be delivered in advance of the site coming forward. It is therefore not considered that the delivery of any infrastructure requirements would impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

The owners of the site have confirmed that they expect development on this site to come forward in the Plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in this site as the site promoters have confirmed their intention to develop the site.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM21.

Site Allocation S31 Senate House (NW Quadrant), Malet Street

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S31 was identified through the Site Allocation Plan 2013 (existing allocation).

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S4 Bloomsbury Campus Area sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver higher education uses (academic and ancillary space) in accordance with Policy S4, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the Site Allocations Plan 2013.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are higher education (academic and ancillary space). This is consistent with Policy S4 (Bloomsbury Campus Area) and considered appropriate given the location of the site.

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

N/A

f. For employment proposals, the estimated floorspace and whether it is justified

No estimated floorspace for Higher education (academic and ancillary space) use is included in the allocation. However, given the sites location in the Bloomsbury Campus Area, the proposed use is considered justified as it is in accordance with Policy S4.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

N/A

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

The key considerations in the policy note that this site is within a Secondary A Aquifer. As any application for development on this site will be considered against Policy S4 Bloomsbury Campus Area and the other policies in the Local Plan no further site specific requirements have been included in the policy.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been

shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding. There is also limited potential for ground water flooding.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S31 is located within Bloomsbury Conservation Area. The site is adjacent Grade II* listed building Senate House, with other Grade II listed buildings on Russell Square and Thornhaugh Street. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 (Historic Environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

As this site has not been allocated for the delivery of housing it is not phased in the Council’s housing trajectory (SD14). The owners of the site have confirmed that they expect development on this site to come forward in the Plan period.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No infrastructure is identified as being considered necessary to support the delivery of the site. If any infrastructure is required to support the delivery of this site, this will be secured through the planning application process and legal agreements.

If infrastructure is identified as being required through the planning application process, then it is unlikely that this would be required to be delivered in advance of the site coming forward. It is therefore not considered that the delivery of any infrastructure requirements would impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

The owners of the site have confirmed that they expect development on this site to come forward in the Plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in this site as the site promoters have confirmed their intention to develop the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation S32 20 Russell Square

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation S32 was identified through an officer suggestion.

b. How the site contributes to delivering the spatial strategy

The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden.

This site is in South Camden. Policy S4 Bloomsbury Campus Area sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver higher education uses (academic and ancillary space) in accordance with Policy S4, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are higher education (academic and ancillary space). This is consistent with Policy S4 (Bloomsbury Campus Area) and considered appropriate given the location of the site.

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

N/A

f. For employment proposals, the estimated floorspace and whether it is justified

No estimated floorspace for Higher education (academic and ancillary space) use is included in the allocation. However, given the sites location in the Bloomsbury Campus Area, the proposed use is considered justified as it is in accordance with Policy S4.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

N/A

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

The key considerations in the policy note that this site is within a Secondary A Aquifer. As any application for development on this site will be considered against Policy S4 Bloomsbury Campus Area and the other policies in the Local Plan no further site specific requirements have been included in the policy.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been

shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding, with 7% of the site identified at medium/high risk of surface water flooding. There is also limited potential for ground water flooding.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted that the Environment Agency commented in their response to the consultation on the draft Local Plan that “All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk.” (see the Statement of the Common Ground with the Environment Agency (EB03n)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation S32 is located within Bloomsbury Conservation Area. The site is between a Grade II* listed building and Grade II listed building. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 (Historic Environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

As this site has not been allocated for the delivery of housing it is not phased in the Council’s housing trajectory (SD14). The owners of the site have confirmed that they expect development on this site to come forward in the Plan period.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered a through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No infrastructure is identified as being considered necessary to support the delivery of the site. If any infrastructure is required to support the delivery of this site, this will be secured through the planning application process and legal agreements.

If infrastructure is identified as being required through the planning application process, then it is unlikely that this would be required to be delivered in advance of the site coming forward. It is therefore not considered that the delivery of any infrastructure requirements would impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

The owners of the site have confirmed that they expect development on this site to come forward in the Plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is developer interest in this site as the site promoters have confirmed their intention to develop the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

