

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

Issue 1: Site Allocations (Central 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 C2 Regis Road and Holmes Road Depot

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 C2 was identified through the London SHLAA.

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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the Regis Road and Murphy sites in Kentish Town as being central to this. It notes that the sites will be intensified to deliver a new neighbourhood that provides a mix of uses, including employment uses; significant provision of permanent self-contained homes; community facilities; cultural and leisure uses; and open space, creating an exemplar sustainable, employment-led mixed-use area that is fully connected to, and integrated into, surrounding communities.

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

The boundary reflects the extent of land identified through the London SHLAA and engagement with the landowner. The boundary was altered slightly following Regulation 18 to include York Mews triangle and part of the Regis Road/ Asphaltic Estate, and a new connection to Spring Place next to the Holmes Road Depot.

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 industry/ employment (including offices), permanent self-contained homes, community uses; open space; waste and recycling facilities; and depot facilities.

The allocation promotes the comprehensive redevelopment of the site, which is characterised by low density industrial use with areas of yard space and parking. The site is identified in the Camden Local Plan 2017 as a growth area providing a significant opportunity to deliver higher density industrial / employment provision and a substantial increase in homes and jobs. The Kentish Town Neighbourhood Plan identifies the site as having potential for intensification through mixed-use development including housing, industry, offices, start-ups and other uses.

The allocation seeks to create a vibrant and sustainable new mixed-use neighbourhood providing intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses, that builds on the distinctive community and character of Kentish Town and makes a significant contribution to meeting identified needs.

The Council is also progressing a regeneration strategy involving Camden's land assets at Regis Road and Holmes Road which includes the objective to enable reprovision of the Recycling Centre and other Council service provision as necessary, while ensuring continuous operation.

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 this site of 1000 additional homes is based on guidance within the adopted area based supplementary planning guidance documents: Kentish Town Planning Framework (TP46) and Regis Road Area Guidance (TP47), which set out detailed development objectives and design principles for this site. No estimated floorspace for the employment use is included in the allocation. However given the existing use of the site and the need to intensify

the existing employment floorspace on this site, it is considered justified to deliver a mix of uses here in line with Policy DS1 and IE3.

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 C2 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 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 a viewing corridor 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.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C2 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 C2 also sets out other site specific requirements relating to design and layout; intensifying employment floorspace; providing a range of employment uses; the retention of existing businesses; provision of retail and food and drink uses; provision of housing; connectivity; active travel; open space provision; provision of community facilities; meanwhile uses; the need to ensure that development is taken forward in a co-ordinated manner; and infrastructure provision.

It is considered that the site specific requirements set out in Policy C2 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 12m - 52 m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (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 either at very low or low risk of surface water flooding, with 20% of the site identified at medium/high risk of surface water flooding. Evidence also suggests the historic River Fleet flowed through the site. 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).

The site is located near Inkerman Conservation Area. A small area of the site allocation is within an Archaeological Priority Area (Kentish Town, Tier II). There are no listed or locally listed 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). The first phase is expected to come forward over years 2030/31 to

2034/35 of the Plan period and the second phase is expected to come forward over years 2038/39 to 2040/41 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 here would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. The site allocation policy states that development must –

- significantly improve connections both through the site, and between the site and the surrounding area, to promote active travel and ensure that the site is successfully integrated into the wider Kentish Town area.
- ensure that the design and layout of the site gives priority to the movement of pedestrians, people using wheelchairs, cyclists and public transport over the operational, servicing and parking demands of private vehicles and that vehicle movements and parking provision are minimised. Where new and/or improved routes are provided, these should be designed to be inclusive, accessible, welcoming, safe, green, well-lit and overlooked.
- ensure that Regis Road is transformed into a green pedestrian and cycling route by moving large vehicles on to a separate service road in advance of any significant commercial development.
- significantly improve the junction of Regis Road and Kentish Town Road to create a safe, welcoming and legible entrance to the new neighbourhood that prioritises the movement of pedestrians and cyclists and provide servicing access for the new employment uses.

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)

- provide, or facilitate and contribute towards, a new pedestrian and cycle bridge across the railway line to connect the Regis Road and Murphy sites, to provide a connection to the Heath Line, Hampstead Heath and the wider area.
- contribute towards improvements at Kentish Town Thameslink and Underground station (including the provision of step-free access, a new station entrance and an enhanced town square) and Gospel Oak station (including a new eastern access and improved public realm).

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 priorities set out in the adopted Kentish Town Planning Framework (LD46) and updated Regis Road Area Guidance SPD (LD47).

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 to two phases. The first phase is expected to come forward over years 2030/31 to 2034/35 of the Plan period and the second phase is expected to come forward over years 2038/39 to 2040/41 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. This is particularly true of the Regis Road and Holmes Road Depot site (C2) in Kentish Town.

The Council anticipates that this site will come forward as two parcels/phases of development. The owner of the majority of the sites forming the Western Parcel has submitted a planning application to take forward the development of their site, whilst the Council anticipates that the Eastern Parcel will come forward towards the end of the Plan period.

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 site is in multiple private ownerships and partly Council owned. Some land assembly may be required to deliver this site, and the Council has formally resolved to investigate using its CPO powers if necessary.

There is developer interest in this site. The Council anticipates that this site will come forward as two parcels/phases of development. The owner of the majority of the sites forming the Western Parcel has submitted a planning application to take forward the development of their site, whilst the Council anticipates that the Eastern Parcel will come forward towards the end of the Plan period.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to Site Allocation Policy C2. These are set out SD51 Schedule of main modifications reference MM22, MM23 and MM96.

Site Allocation C3 Murphy Site

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 C3 was identified through engagement with the landowner.

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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the Regis Road and Murphy sites in Kentish Town as being central to this. It notes that the sites will be intensified to deliver a new neighbourhood that provides a mix of uses, including employment uses; significant provision of permanent self-contained homes; community facilities; cultural and leisure uses; and open space, creating an exemplar sustainable, employment-led mixed-use area that is fully connected to, and integrated into, surrounding communities.

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

The boundary reflects the extent of land identified through engagement with the landowner. The boundary was altered slightly following Regulation 18 to remove the Forum loading yard.

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 industry / employment; permanent self-contained homes and student accommodation; community uses; open space.

The Murphy site forms part of the Kentish Town Industry Area, which is considered to be a Locally Significant Industrial Site (LSIS) in terms of the London Plan.

Part of the site lies within the Dartmouth Park neighbourhood area and part lies within the Kentish Town neighbourhood area. The site is identified in the Kentish Town Neighbourhood Plan as being within the Kentish Town Potential Development Area. The Plan supports the mixed-use redevelopment of the site for housing, business and industrial uses. The Dartmouth Park Neighbourhood Plan identifies the site as providing an opportunity for development for a mix of residential and business/ employment units, to enhance the area, and sets out aspirations for any development.

The allocation promotes the comprehensive redevelopment of the site, which is characterised by low density industrial use with areas of yard space and parking.

The allocation seeks to deliver an employment-led development, designed to create a vibrant, sustainable new mixed-use area, taking the opportunity for significant intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses. The site is not considered appropriate for leisure, cinema or hotel uses as it is not within an identified town centre.

The uses reflect the Council's priorities for this site in terms of promoting a mixed use development that intensifies industrial and other employment uses, reflecting the designation of the Kentish Town Industry Area, whilst also helping meet the Local Plan housing target and providing uses for a mixed community. The allocation will also deliver 750 homes, which will contribute towards meeting Camden's need for housing.

Furthermore, the Council considers that the approach taken in relation to this site is in line with Policy E7 Industrial intensification, co-location and substitution of the London Plan (RD01).

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 based on guidance within the Kentish Town Planning Framework (TP46) and Regis Road Area Guidance (TP47) which set out detailed development objectives and design principles for this site. No estimated floorspace for the employment use is included in the allocation. However given the existing use of the site and the need to intensify the existing employment floorspace on this site, it is considered justified to deliver a mix of uses here in line with Policy DS1 and IE3.

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 C3 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The locomotive sheds on the site are locally listed. To mitigate any impact criterion 19 states that development must seek to retain and reuse the locally listed locomotive sheds and the attached and adjacent ancillary structures as a key feature any development.

- Biodiversity. To mitigate any impact on adjacent Sites of Importance for Nature Conservation (SINC) criterion 15 states that development must enhance the biodiversity corridors along the railway lines to the north and north east of the site, which are a designated Grade I Site of Important Nature Conservation to support biodiversity and create and improve connections for wildlife.
- Viewing corridors. Part of the 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.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C3 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. Developers should have due regard to this.
- Water supply and waste water 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 a detailed drainage strategy may be required.

In addition to the above criteria Policy C3 also sets out other site specific requirements relating to the delivery of an employment led development; design and layout; intensifying industrial floorspace; co-location of existing uses; providing a range of employment uses; the retention of existing businesses; provision of retail and food and drink uses; provision of housing; open space; community benefits; biodiversity; consideration of views; retention of existing buildings; parking; transport impact; servicing; provision of a green corridor; routes and connection; meanwhile uses; tall buildings; pedestrian and cycle improvements and a railway bridge crossing; improvements to Greenwood Place; contributions to improvements at Kentish Town Thameslink Underground and Gospel Oak stations; and contributions to the delivery of the Camden nature corridor.

It is considered that the site specific requirements set out in Policy C3 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 12m – 45m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (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 25% 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 close 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)).

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 C3 is located near Dartmouth Park and Mansfield Conservation Areas. There are Grade II listed buildings adjacent to the site on Highgate Road, and a locally listed building within the site. A small area of the site allocation is within an Archaeological Priority Area (Kentish Town, 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 in years 2035/36 to 2039/40 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.

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)

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 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. The site allocation policy states that development must –

- seek to ensure that the site is designed to minimise vehicle movements and parking;
- fully assess the transport implications of the constrained access to the site and reflect this in the type of employment uses provided on site. A transport strategy to mitigate the site-specific constraints should be developed, and should explore new access points, freight consolidation, servicing, and limiting traffic;
- ensure that conflict between servicing traffic and public areas is minimised, with separation as far as possible;
- deliver significant improvements to access into the site and connections to surrounding areas; and
- seek to provide a new route between employment premises on Highgate Road and Kentish Town West to connect the area's business communities ('Makers 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 is considered necessary to support the delivery of the site and reflects the priorities set out in the adopted Kentish Town Planning Framework (LD46) and updated Regis Road Area Guidance SPD (LD47) and key stakeholder's 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 in years 2035/36 to 2039/40 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 site is in multiple private ownerships

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

There is developer interest in this site. There are ongoing pre application discussions with the landowners.

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 - modification reference MM24, MM97 and MM98.

Site Allocation C4 Kentish Town Police Station

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 C4 was identified through the Site Allocations Plan 2013 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, police facilities and infrastructure in accordance with Policy C1, 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 and 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 police facilities; permanent self-contained homes and student accommodation.

The site contains a listed Victorian police station (Station House), with a more modern annex building attached, and an eight storey police Section House. It also includes a yard, vehicle parking and some small-scale structures.

The allocation seeks to support the retention of the police facilities in line with the operational requirements of the Metropolitan Police Service whilst also supporting the site being taken forward as part of the development of Regis Road (Policy C3) to support the delivery of the Regis Road masterplan. The allocation seeks to optimise the delivery of housing, to meet the borough's 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 35 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 and an element of new build. A scenario involving full demolition was not

assessed as the site includes a listed 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. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the police facilities use is included in the allocation. However given the existing use of the site it is considered justified to continue to seek police facilities here as part of a mixed use development.

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 C4 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The Police Station House is a Grade II listed building. To mitigate any impact criterion 3 states that development must preserve the listed police Station House building and not harm its setting, in accordance with Policy D5 (Historic Environment).

In addition to the above criteria Policy C4 also sets out other site specific requirements relating to continued provision of police facilities; retention of existing buildings; housing provision; routes and connections; and access.

It is considered that the site specific requirements set out in Policy C4 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.

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 5% of the site identified at either medium or high 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).

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 C4 is not located within or adjacent a Conservation Area. The site contains a Grade II listed Victorian police station (Station 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

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 over years 2030/31 to 2034/35 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 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.

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)

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 ensure that the main vehicular entrance to the site is from Regis Road in order to accommodate the Council's wider aspirations for the Holmes Road area.

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 priorities set out in the adopted Kentish Town Planning Framework (LD46) and updated Regis Road Area Guidance SPD (LD47).

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 to two phases. This site is expected to come forward over years 2030/31 to 2034/35 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).

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 this site. The site is currently being considered as part of a wider planning application for this site and the Regis Road site adjacent (2025/4861/P).

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 - modification reference MM25 and MM26.

Site Allocation C5 369 – 377 Kentish Town 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 C5 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, retail floorspace and infrastructure in accordance with Policy C1, 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 2019/0910/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; retail/restaurant.

The site was previously occupied by a car wash and is situated in Kentish Town Town Centre.

The allocation supports the intensification of the site to deliver employment uses and permanent self-contained homes, to help meet the borough's housing need, in line with Policy H1. This is also in line with the objectives for this site set out in the Kentish Town Neighbourhood Plan.

The allocated uses reflect the planning permission 2019/0910/P for the redevelopment of the site to provide 14 flats, with retail/or a restaurant at ground floor/basement levels and a widened pavement on Kentish Town Road.

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 14 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the retail / restaurant use is included in the allocation. However given the existing use of the site and its location, it is considered justified to seek employment uses here as part of a mixed use development.

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 C5 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The Kentish Town Conservation Area lies to the east of the site, with listed buildings nearby. To help mitigate any impact criterion 3 states that development must be of a high quality design reflecting the site's prominent location on Kentish Town Road, within a strategic viewing corridor; the adjacent Conservation Area to the east; and the listed buildings nearby, including the Assembly House public house to the south on the other side of Kentish Town Road.

- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C5 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. The 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 C5 also sets out other site specific requirements relating to design; connectivity; pedestrian safety; pedestrian and cycle routes; relocation of the bus shelter; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C5 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)).

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 C5 is located near Kentish Town Conservation Area. There are Grade II listed buildings nearby on Leverton Place and Kentish Town Road. The site allocation is within an Archaeological Priority Area (Kentish Town, 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 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 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

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.

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 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 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 this site. There is an extant planning permission for the site and recent planning permissions including non-material amendments to the existing 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 - MM27 and MM88.

Site Allocation C6 Kentish Town Fire Station

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 C6 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 Central Camden. Policy C1 Central 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 community uses in accordance with Policy C1, 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 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 fire station; permanent self-contained homes and student accommodation.

The site lies to the north of Kentish Town's town centre and is occupied by the operational Kentish Town Fire Station. The London Fire and Emergency Planning Authority's Asset Management Plan rates the site as having poor functionality and being in poor condition, listing it as a priority site for improvement through redevelopment rather than relocation.

The allocation seeks to optimise the use of the site to deliver a replacement fire station that better meets the needs of the London Fire Brigade, in addition to housing to help meet the borough's housing 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 30 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 a fire station and residential uses has been modelled. Allocated capacity is based on the retention and extension of the existing fire station, demolition of the fire tower and an element of new build. 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 fire station use is included in the allocation. However given the existing use of the site it is considered justified to continue to provide this use here as part of a mixed use development.

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 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 C6 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. There is a Grade II listed church opposite site, and locally listed buildings nearby. Any impact should be mitigated by criterion 5 which states that

development must be designed to respond to, and enhance the setting of, the listed Christ Apostolic Church opposite.

- Trees. Any impact should be mitigated by criterion 6 which states that development must retain existing trees and provide new planting in accordance with Policy NE3 Tree protection and planting.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C6 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 C6 also sets out other site specific requirements relating to housing provision; design; provision of a mix of uses; agent of change; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C6 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.

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 1% of the site identified at medium/high risk of surface water flooding. The site is also located on a previously flooded street. 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 C6 is not located within a Conservation Area. There is a Grade II listed building adjacent to the site. The site allocation is within an Archaeological Priority Area (Kentish Town, 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 Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered 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

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)

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 public ownership

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

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 MM89.

Site Allocation C7 Morrisons Supermarket

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 C7 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the Camden Goods Yard area as being central to this. It notes that this area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes and provide a range of retail and employment spaces.

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

The boundary reflects the extent of land identified in planning applications 2017/3847/P and 2022/3646/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 (offices and maker spaces), retail, food and drink, community and leisure use.

The site was previously in use as a Morrisons supermarket, with associated car parking.

The allocated uses reflect the planning permission granted for the site (2017/3847/P and 2022/3646/P) and the Council's priority for self-contained homes to help meet the borough's housing need, and are therefore considered appropriate.

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 644 additional homes. This reflects the planning permissions granted for the site. No estimated floorspace for the employment (office and maker spaces) retail, food and drink, community and leisure use is included in the allocation. However given the existing use of the site and its location, it is considered justified to seek employment, retail, food, drink, community and leisure uses here as part of a mixed use development.

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 C7 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Viewing corridors. Part of the 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.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C7 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. Developers should have due regard to this.

In addition to the above criteria Policy C7 also sets out other site specific requirements relating to housing provision; delivering a mix of uses; re-provision of a supermarket; design and access; car-free development; open space; biodiversity; tall buildings; pedestrian and cycling routes; long-term sustainable bus solutions; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C7 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 12m – 53 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies. The Council has granted planning permission for a development of up to 56m. 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 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 C7 is not located in or adjacent a Conservation Area. There is a Grade II* listed Camden Incline Winding Engine House adjacent and Grade II listed building on Oval Road. The site allocation is within an Archaeological Priority Area (Regents Canal and Rail Infrastructure, 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 2026/27 to 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 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 through transport assessments and statements at the planning application stage where necessary.

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)

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 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 2026/27 to 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 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 this site. This site has planning permission. There is also a current outstanding appeal on the site relating to affordable housing provision.

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 MM28.

Site Allocation C8 Former Morrisons Petrol Filing Station

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 C8 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the Camden Goods Yard area as being central to this. It notes that this area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes and provide a range of retail and employment spaces.

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 2022/3646/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 (offices), retail, food and drink.

The allocated uses reflect the planning permission granted for the site (2020/3646/P) and the Council's priority for self-contained homes to help meet the borough's housing need, and are therefore considered appropriate.

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 not specified as it is encompassed in the housing capacity for C7 above. No estimated floorspace for the employment (offices) retail, food and drink use is included in the allocation. However given the existing use of the site and its location, it is considered justified to seek employment, retail, food and drink uses here as part of a mixed use development.

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 C8 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 Regent's Canal Conservation Area, and a Grade II* listed building is adjacent. Policy D5 Historic environment sets out the Council's approach to conserving the historic environment, and applicants would be expected to have due regard to this policy.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C8 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. Developers should have due regard to this.
- 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 C8 also sets out other site specific requirements relating to design; access; provision of housing; active frontages; urban greening; provision of the consented youth space; and retention of existing buildings.

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 C8 is located within Regents Canal Conservation Area. There is a Grade II* listed Stables market adjacent and Grade II* listed building (Roundhouse)

nearby. The site allocation is within an Archaeological Priority Area (Regents Canal and Rail Infrastructure, 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 alongside the delivery of site allocation C7 which is identified to come forward in the years 2026/27 to 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 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 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?

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)

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 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 alongside the delivery of site allocation C7 which is identified to come forward in the years 2026/27 to 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 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 this site. This 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 MM29.

Site Allocation C9 100 Chalk Farm 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 C9 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the Camden Goods Yard area as being central to this. It notes that this area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes and provide a range of retail and employment spaces.

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 2024/0479/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, student accommodation, employment, retail and cafés / restaurants (ground level).

The site currently comprises three commercial buildings and is located within the designated Camden Town Town Centre. The allocated uses reflect the current use of the site, its location and the need to optimise the development of the site to maximise the delivery of new homes to meet housing need.

The allocated uses also reflect the planning permission that has been granted on this site.

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 30 additional homes and 264 student units. This reflects the planning permission granted for the site. No estimated floorspace for the employment, retail cafes / restaurant use is included in the allocation. However, given the sites Town Centre location and existing use, the delivery of employment, retail and food and drink use here as part of a mixed use development is considered to be justified.

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 C9 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The Grade II* listed Roundhouse building is located immediately adjacent to the site and there is a Grade II listed cattle trough to the front of the site. Any impact is mitigated by criterion 4 which states that development must be of a high-quality design that is appropriate to the high street location and responds to the area's historic context and assesses the impact of proposals on locally important views, of which those of the Roundhouse and Stables Market / the Horse Hospital are particularly critical; and criterion 6 which states that development must be designed to preserve and enhance the setting of the Roundhouse and the adjacent gap, by opening up views of this heritage asset from Chalk Farm Road, whilst ensuring it can continue to be read as a separate entity in the townscape. Separations and setting back of development from the listed structure, splaying building lines, and the location of open space in proposals could help address this. Furthermore the other considerations note that due regard should be given to relocating and restoring the Grade II listed drinking fountain and cattle trough (on the Heritage at Risk Register) outside of the site boundary to preserve and enhance the historical significance.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C9 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. Developers should have due regard to this.
- Water supply. Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.

In addition to the above criteria Policy C9 also sets out other site specific requirements relating to housing provision; design; mix of uses; delivery of development; urban greening and tree planting; car-free development; agent of change; public realm improvements; step free access; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C9 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). However the policy notes that The Council has resolved to grant planning permission for a development of up to 40m. 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 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)).

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 C9 is located near Regents Canal Conservation Area. There is a Grade II* listed Roundhouse building located immediately adjacent to the site and there is a Grade II listed cattle trough to the front of the site. The site allocation is within an Archaeological Priority Area (Regents Canal and Rail Infrastructure, 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 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 plans⁸.

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)

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 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, the policy states that development must remove existing car parking in line with this Plan's car-free approach.

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 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 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 this site. Planning permission has been granted on the site.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modification 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 MM30.

Site Allocations C10 Juniper Crescent

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 C10 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the Camden Goods Yard area as being central to this. It notes that this area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes and provide a range of retail and employment spaces.

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

The boundary reflects the extent of land identified through engagement with the landowner.

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, small-scale employment space and community uses (or other appropriate ground floor uses).

This is an existing housing estate, and the allocated uses seek to maximise the site's potential to deliver a housing-led scheme, incorporating significant regeneration benefits for the existing housing estate and wider Camden Goods Yard area.

The allocated uses are reflected in the recent planning permission 2025/3057/P for the redevelopment of the site to provide residential and community uses. This was approved by the council at planning committee on 26/02/2026 subject to GLA Stage II referral and agreement of the Section 106.

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 375 additional homes (this reflects the net increase in units and does not include the existing 120 homes to be re provided as part of the redevelopment). 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 has been modelled. Allocated capacity is based on the demolition of existing buildings. A scenario involving retention and extension was not tested as at a ballot held in late 2022 the majority of residents supported the proposed redevelopment of the estate. 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 small scale employment and community use is included in the allocation. However, given the location of the site and the need to deliver supported communities it is considered justified to seek small scale employment and community uses here.

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 C10 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The Grade II* listed Roundhouse building is in close proximity. To mitigate any impact on this criterion 9 states that development must be designed to conserve or enhance the significance of the Grade II* Roundhouse and its setting, and respect locally important views in accordance with Policy D5 (Historic Environment).
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C10 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. Developers should have due regard to this.
- Water supply and 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 a 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 C10 also sets out other site specific requirements relating to housing provision; design and access; meeting housing need; delivery of development; complimentary uses; urban greening; car free development; community safety; tall buildings; open space; biodiversity; pedestrian and cycling routes; bus stops; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C10 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 9m - 45 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (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 15% of the site identified at medium/high risk of surface water flooding. The site is also in the 41-60 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 C10 is not located within a Conservation Area. There is a Grade II* listed Roundhouse building situated across the railway. The site allocation is within an Archaeological Priority Area (Regents Canal and Rail Infrastructure, Tier II). Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 (Historic Environment).

The planning application for the re-development of this site has recently been approved by the Council's planning committee, subject to the agreement of the section 106 and referral to the Mayor. Here it should be noted that the heritage assessment of the scheme found that impact on the roundhouse was "Low level of less than substantial harm".

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 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 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 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 11 states that development must rationalise parking on-site in line with Policy T5 (parking and car free development). Where existing residents' parking is reprovided, this should be located to minimise car movements within the site and be designed to allow for repurposing when no longer required.

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)

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 site now benefits from planning permission (subject to the section 106 being agreed) 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 comprehensive 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 between 2030/31 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

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 this site. The planning application for the re-development of this site has recently been approved by the Council's planning committee, subject to the agreement of the section 106 and referral to the Mayor.

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 MM31.

Site Allocation C11 Network Rail land at Junipers Crescent

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 C11 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the Camden Goods Yard area as being central to this. It notes that this area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes and provide a range of retail and employment spaces.

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 Regulation 19 consultation.

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

The allocated uses are permanent self-contained homes, office / light industrial, operational railway use.

The site is currently safeguarded to support High Speed Two (HS2) construction works and provides an operational access point to the railway.

The site is covered by the Camden Goods Yard SPD which states that the site represents a strategically important opportunity to connect the framework area with Primrose Hill and complete an integrated neighbourhood and encourages the development of the area for residential led-mixed use. The SPD also notes that if a proportion of the land continues to be needed for railway operational purposes, this should be limited to the minimum area required and should be designed as part of an integrated mixed use scheme that contributes towards the framework objectives.

The allocated uses are in line with the Camden Goods Yard SPD and seek to create a compatible mix of uses, taking into account the current use of the site, its location and the need to optimise the use of the site to deliver permanent self-contained housing in accordance 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 55 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 and employment uses has been modelled. Allocated capacity is based on a cleared site. The site is currently occupied by temporary structures connected to HS2 works and open storage for railway maintenance works. The temporary buildings will be removed once the use ceases, therefore a retention/extension scenario has not been assessed. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the office / light industrial or operational railway use is included in the allocation. However given the existing use of the site and its location, 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 C11 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. The Grade II* listed Roundhouse building is in close proximity. To mitigate any impact on this criterion 2 states that development must be designed to conserve or enhance the significance of the Grade II* Roundhouse and its setting, and respect locally important views in accordance with Policy D5 (Historic Environment).
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C11 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. Developers should have due regard to this.

In addition to the above criteria Policy C11 also sets out other site specific requirements relating to the mix of uses; design and layout; agent of change; biodiversity; tall buildings; access; pedestrian and cycling routes; and bus operations.

It is considered that the site specific requirements set out in Policy C11 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 9m - 45 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (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 7% 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 close the site. Furthermore, the site is in the 41-60 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 C11 is not located within a Conservation Area. There is a Grade II* listed Roundhouse building situated across the railway. The site allocation is within an Archaeological Priority Area (Regents Canal and Rail Infrastructure, 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 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 plans¹⁰.

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

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)

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 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 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 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 owners have confirmed ongoing engagement and consultation with stakeholders and developers in their Regulation 19 consultation response.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation C12 Gilbeys Yard

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 C12 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies the delivery of development in the Camden Goods Yard area as being central to this. It notes that this area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes and provide a range of retail and employment spaces.

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

The boundary reflects the extent of land identified through engagement with the landowner.

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, small-scale employment space, community use.

Gilbey's Yard is an existing housing estate adjacent to Camden Town Town Centre. The allocation supports the comprehensive re-development of the site in order to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 (Maximising Housing Supply). This is also consistent with the objectives set out in the Camden Goods Yard Planning Framework which states that the Council will support measures at Gilbeys Yard to improve the relationship of the estate with its surrounding environment and where possible deliver additional homes.

It is also considered appropriate to deliver small-scale employment space and community uses, to support the delivery of healthy and sustainable communities, in line with 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 120 additional homes (this does not include the existing 80 homes that are to be re-provided on the site). 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 has been modelled. Allocated capacity is based on the demolition of all 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 small scale employment and community use is included in the allocation. However, given the location of the site and the need to deliver supported communities it is considered justified to seek small scale employment and community uses here.

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 C12 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 located within Regents Canal Conservation Area. There is a Grade II listed Interchange building partly within the site and Grade II* listed Camden Incline Winding Engine House adjacent. To help mitigate any impact criterion 1 states that development must provide new and replacement homes to meet a range of housing needs in accordance with Policy H6, including the maximum reasonable amount of affordable housing. The exact number of homes will be dependent on a full appraisal of the impacts of development on heritage assets, views and surrounding townscape; and criterion 6 states that development must be designed to respond to the industrial character of the canal side environment and wider Camden Goods Yard area, in terms of the architectural design and landscaping, taking opportunities to preserve and, where appropriate, enhance heritage assets, above and below ground, and protect locally important views. The proximity of the site to The Interchange building (Grade II listed) and the impact on the setting and views of this asset are particularly important.
- **Biodiversity.** The site is adjacent to the Regents Canal, which is designated a site of Metropolitan importance for nature conservation. To mitigate any impact criterion 12 and 13 state that development must contribute to improvements in the biodiversity of the Canal, which is designated as a Site of Importance for Nature Conservation; and explore opportunities to incorporate measures to manage the effects of lighting on the Canal, to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.
- **Flood risk.** As the site is within an area identified by the Council as being at risk of flooding Policy C12 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. Developers should have due regard to this.
- **Water supply and 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 a detailed drainage strategy may be required.
- **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 C12 also sets out other site specific requirements relating to provision of housing; meeting particular housing need; provision of complimentary uses; delivery of development; design and layout; servicing; car free development; communal amenity space; community safety; pedestrian and cycling routes; open space; biodiversity on site; retention of existing buildings.

It is considered that the site specific requirements set out in Policy C12 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 15% of the site identified at medium/high risk of surface water flooding. The site is also in the 41-60 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 C12 is located within Regents Canal Conservation Area. There is a Grade II listed Interchange building partly within the site and Grade II* listed Camden Incline Winding Engine House adjacent. The site allocation is within an Archaeological Priority Area (Regents Canal and Rail Infrastructure, 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 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 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

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 criteria 9 states that development must seek rationalise parking on-site in line with Policy T5 (Parking and Car Free Development) and reduce vehicular dominance.

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 and key stakeholders 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.

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 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 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 private ownership.

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

There is developer interest in this site. The owners responded positively to the Regulation 19 consultation. Development on this site is however subject to a successful ballot of residents.

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 MM32 and MM33.

Site Allocation C13 West Kentish Town 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 C13 was identified through 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies this site as being central to this. 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 central area of the borough is the West Kentish Town and Wendling and St Stephen's Close estates

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

The boundary reflects the extent of land identified through 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, small-scale employment space and community uses (or other appropriate ground floor uses).

The site is a council-owned housing estate containing 316 homes. In a ballot in March 2020, an overwhelming majority of residents voted for the demolition and complete redevelopment of the estate. The allocated uses seek to support a phased development of the site to ensure the balanced delivery of new affordable and market homes.

The allocated uses also seek to support the delivery of regeneration benefits for the wider community to address the local priorities set out within the Gospel Oak and Haverstock Community Vision and contribute towards the enhancement of the

Queen's Crescent neighbourhood centre, through the commercial and community uses, whilst also making provision for particular housing needs identified by Policy H6 Housing Choice and Mix, including affordable housing for older people, or other people with care or support requirements.

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 based on the guidance in the Gospel Oak and Haverstock Community Vision (TP49) which sets out detailed development objectives and design principles for this area (including this site), which have been agreed with the local community.

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 C13 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 close proximity to both the West Kentish Town Conservation Area and the Inkerman Conservation Area, with a Grade II listed building to the south and locally listed buildings nearby. This is mitigated by criterion 10 which states that development must be designed to respect the sensitive heritage constraints, including the strategic view from Parliament Hill, as well as the nearby West Kentish Town and Inkerman Conservation Areas, and nearby listed buildings.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C13 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. Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.
- 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 C13 also sets out other site specific requirements relating to the delivery of community benefits; provision of housing; meeting housing need; delivery of development; community benefits; improving walking, wheeling and cycling; biodiversity; car-free development; delivery of private amenity space; trees; tall buildings; pedestrian and cycling routes; open space; the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C13 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 12m - 40m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (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 10% of the site identified at medium/high risk of surface water flooding. Evidence also suggests the historic River Fleet flowed through part of the site. 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 C13 is located next to West Kentish Town Conservation Area and near Inkerman Conservation area. Next to the site there is a Grade II listed primary school and nursery on Rhyl Street, and locally listed buildings on Grafton Road and Warden Road. 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 has recently been granted planning permission, subject to the agreement of the section 106 and is expected to come forward in phases between years 2028/29 - 2040/41 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.

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)

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 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 priorities for the site as set out in the Gospel Oak and Haverstock Community Vision SPD (LD48) and key stakeholders' comments.

This site now benefits from planning permission (subject to the section 106 being agreed) 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 phases between years 2028/29 - 2040/41 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.

There is developer interest in the site. The site has resolution to grant planning permission 2025/2667/P to redevelop 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 MM34.

Site Allocation C14 Hawkridge 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 C14 was submitted to the Council as part of the consultation on the draft Local Plan.

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 Central Camden. Policy C1 Central 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 C1, 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 to the Council as part of the consultation on the draft Local Plan.

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 student accommodation.

The site comprises 216 student units and is located in a residential area, adjacent to the West Kentish Town Estate, which is identified for regeneration by the Council and also allocated in this Local Plan (Allocation C13).

The buildings were most recently used as student accommodation for postgraduates of University College London. However, the buildings have been vacant since 2020.

The allocated uses seek to optimise the site to provide additional student accommodation in accordance with Policy H9 (Student Accommodation).

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 the site is 19 additional student units. 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 student accommodation only has been modelled. Allocated capacity is based on the retention and extension of 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 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

See the response to e. above.

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

See the response to e. above.

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 C14 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Trees. To mitigate any impact criterion 6 states that development must retain the existing tree and provide additional trees and vegetation, in accordance with Policy NE3 (Tree Protection and Planting).
- 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 C14 also sets out other site specific requirements relating to the provision of student accommodation; design and layout; delivery of development; street frontages; open space; car parking; pedestrian and cycling routes; Camden Nature Corridor; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C14 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 Camden Building Heights Study does however note that the existing tall building on the site is 44.9m.

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 2% of the site identified at medium/high 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)).

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 C14 is not located within or near a Conservation Area. Next to the site there is a locally listed building on Grafton Road. 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 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.

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)

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 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 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 consultation on the draft Local Plan.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation C15 Wendling Estate and St Stephens Close

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 C15 was identified through 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies this site as being central to this. 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 central area of the borough is the West Kentish Town and Wendling and St Stephen's Close estates.

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

The boundary reflects the extent of land identified through 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, health and community facilities.

The site currently provides 241 existing homes in three and four-storey blocks, which are divided into flats and maisonettes, and one block of 10 storeys divided into one-bedroom flats.

The Council is preparing development proposals for Wendling Estate and St Stephens Close. This will involve the redevelopment of all existing buildings as part of a comprehensive regeneration scheme. The Council undertook a ballot of residents in summer 2021. Residents voted in favour of the proposals based on a comprehensive redevelopment.

The allocated uses reflect that the Council's priority for this site is the re-provision of existing homes to meet both modern standards and the housing needs of residents whilst also delivering regeneration benefits for the wider community that help to address the local priorities set out within the Gospel Oak and Haverstock Community Vision, including health and community 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 this site is 509 additional homes. This is based on guidance in the adopted Gospel Oak and Haverstock Community Vision (TP49) which sets out detailed development objectives and design principles agreed with the local community for this area, which includes this 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.

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 C15 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 adjacent to both the Mansfield and Parkhill Conservation Areas. St Martin's Church in proximity to the site to the east is Grade I listed and the Roman Catholic Priory Church of St, Dominics to the southwest of the site is Grade II* listed. To mitigate any impact criterion 8 states that development must be designed to be sensitive to the surrounding townscape including the nearby Parkhill and Mansfield conservation areas and consider any impacts on the setting of the Grade II* St Dominic's Priory.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C15 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. Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.
- 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 C15 also sets out other site specific requirements relating to the delivery of community benefits; provision of housing; meeting housing needs; the phased delivery of development; active frontages; car-free development; safety and security; trees; tall buildings; pedestrians and cycling; re-provision of community facilities; open space; estate connectivity; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C15 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 – 40m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2(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 20% of the site identified at medium/high risk of surface water flooding. The site is located in a Local Flood Risk Zone and next to a previously flooded street. 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 C15 is located near Mansfield and Parkhill Conservation Areas. St Martin's Church in proximity to the site is Grade I listed to the east and the Roman Catholic Priory Church of St Dominics to the southwest of the site is Grade II* listed. There are locally listed buildings adjacent on Southampton Row. 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 2032/33 - 2040/41 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 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

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 6 states that development must rationalise parking on-site in line with Policy T5 (Parking and Car Free development). Where existing residents parking is reprovided, this should be located to minimise car movements within the site and be designed to allow for repurposing when no longer required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent

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)

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 priorities for the site as set out in the Gospel Oak and Haverstock Community Vision SPD (LD48) and key stakeholders 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 2032/33 - 2040/41 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).

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 and engagement with the community is underway following the adoption of the Gospel Oak and Haverstock Community Vision SPD (LD49).

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 MM35.

Site Allocation C16 Shirley 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 C16 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 Central Camden. Policy C1 Central 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 C1, 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 engagement with the landowner.

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 student accommodation.

Shirley House is a 7-storey office building, situated adjacent to Camden Town Town Centre.

The allocated use seeks to support the delivery of student accommodation in accordance with Policy H9 (Student Accommodation) to help meet housing 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 197 student units. 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.

The allocated capacity is based on the retention and extension of 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 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 C16 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 Regent's Canal Conservation Area. To mitigate any impact criterion 2 states that development must ensure the design, layout and orientation of development positively relates to the Canal and local character.
- Site of Importance for Nature Conservation (SINC) Grade M. To mitigate any impact criterion 4 states that development must contribute to improvements in the biodiversity of the Canal, which is designated as a Site of Importance for Nature Conservation. Furthermore criterion 5 states that development must explore opportunities to incorporate measures to manage the effects of lighting on the Canal, to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C16 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.
- Trunk sewer. 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 C16 also sets out other site specific requirements relation to the provision of student accommodation; design; canal moorings; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C16 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 13% of the site identified at medium/high risk of surface water flooding. 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 C16 is located within Regents Canal Conservation Area. There are Grade II listed buildings and locally listed buildings adjacent on Camden Road. 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.

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

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)

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 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 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 2030/31.

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 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 a call for sites, and the owners responded to the Regulation 19 consultation. There are ongoing pre application discussions with the landowner and an application is expected this year.

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 MM36, MM37 and MM38.

Site Allocation C17 Camden Town over station development

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 Councils Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations are set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation C17 was identified through the London SHLAA 2017.

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 Central Camden. Policy C1 Central 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, retail floorspace and infrastructure in accordance with Policy C1, 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 London SHLAA and engagement with the landowner. The boundary was altered following the Regulation 18 stage consultation to include Buck Street Market.

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, employment uses (including maker spaces, creative industries and offices), retail, and food and drink uses (on the ground level).

The site is located in Camden Town Town Centre. The allocated uses seek to support the delivery of a mixed-use development incorporating a new station entrance and ancillary supporting facilities for the station, permanent self-contained homes, and employment uses, including retail along the Buck Street and Kentish Town Road frontages.

In addition to allocation seeks to optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply) and Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) and student accommodation in accordance with Policy H9 (Purpose-built Student Accommodation).

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 58 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, commercial and the underground station was modelled. The allocated capacity is based on demolition of existing buildings as the site is expected to deliver significant strategic transport improvements that will benefit both Camden and the whole of London. The redevelopment of part of the site (the station entrance) will be covered by a Transport Work Act, which means that consent is not required for demolition. The remainder of the site is occupied by temporary structures (box park). Given this, a scenario involving the retention of existing buildings has not been tested. The capacity of the site was assessed taking into account the recommendations in the Camden Building Heights Study. No estimated floorspace for the employment, retail and food and drink use is included in the allocation. However, given the sites Town Centre location and existing use, the delivery of employment, retail and food and drink use here as part of a mixed use development is considered to be justified.

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 C17 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage assets. The site is partly in the Camden Town Conservation Area and adjacent to the Regent's Canal Conservation Area. There is also a locally listed building within the site. To mitigate any impact criterion 10 states that development must respond positively and sensitively to local context and character in accordance with Policy D1 (Achieving Design Excellence) and be designed to achieve a positive relationship with the Camden Town Conservation Area and Regent's Canal Conservation Area. This is likely to involve a transition in height and scale across the site from the more intimate, low-rise nature of Stucley Place to Kentish Town Road, which is generally lined by buildings of 4-5 storeys south of Hawley Crescent.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C17 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 C17 also sets out other site specific requirements relating to the delivery of a mixed use scheme; housing provision; design; employment uses; nearby sites; active frontages; Agent of Change / amenity; provision of retail; provision of a new civic space; improvement to the street environment; noise; transport infrastructure; step-free access; public realm improvements; decentralised heating; improving Inverness Street Market; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C17 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 half the site is identified at medium to high risk of surface water flooding. The site is also located on a previously flooded street. 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 C17 is located within Camden Town Conservation Area and near Regents Canal Conservation Area. There is a locally listed building within the site on Buck Street, and next to the site on Camden High 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 2035/36 to 2036/37.

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 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?

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)

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 and key stakeholders 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 2035/36 to 2036/37.

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 responded to the Regulation 19 consultation. There are also ongoing pre application discussions with the landowner.

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 MM39 and MM40.

Site Allocation C18 UCL Campus, 109 Camden 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 C18 was identified through an officer suggestion following discussions with the landowner.

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 Central Camden. Policy C1 Central 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 C1, 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 engagement with the landowner.

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 student accommodation.

The site largely comprises student accommodation (714 existing rooms) for UCL students in several separate buildings with a reception area and communal areas for students.

The allocated use seeks to support the delivery of additional student accommodation here in accordance with Policy H9 (Purpose-built Student Accommodation).

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 the site is 180 additional student units (the site currently comprises 174 student rooms). 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 student accommodation only has been modelled. Allocated capacity is based on the retention and extension of existing buildings and some new build. The capacity takes into account the need to protect the existing open space and trees on 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 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

See the response to e. above.

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

See the response to e. above.

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 C18 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 Rochester Conservation Area. To mitigate this criterion 2 states that development must be designed to ensure that any proposed increase in height is focussed in the central part of the site, to reduce the impact on the surrounding area and adjacent heritage assets.
- On-site open space. To mitigate any impact criterion 3 states that development must protect existing open space on the site and ensure that new and /or enhanced open space is provided in accordance with Policy SC4 (Open Space). As part of this, development should explore opportunities to increase green amenity spaces between the buildings on site; retain the existing trees and provide additional trees and vegetation, in accordance with Policy NE3 (Tree Protection and Planting).
- On-site allotments. To mitigate any impact criterion 4 states that development must protect the existing allotments and food growing on site in accordance with Policy SC5 (Food Growing).
- 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 a detailed drainage strategy may be required.

- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy C18 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. Part of the 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 C18 also sets out other site specific requirements relating to the delivery of student accommodation; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C18 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 15% of the site identified at medium/high risk of surface water flooding. 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 C18 is partly located within Rochester Conservation Area and next to Bartholomew Estate and Camden Square Conservation Areas. There is a Grade II listed building near the site on Camden Road. 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 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 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

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)

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 private ownership.

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

There is developer interest in the site. There are ongoing discussions with the landowner, who confirmed development intentions at Reg 18 consultation stage.

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 MM41.

Site Allocation C19 Arlington Road former depot site.

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 C19 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 Central Camden. Policy C1 Central 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 C1, 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 engagement with the landowner and planning application 2024/4953/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 employment and permanent self-contained homes.

The site was previously used by Camden Council as offices and a base for its street cleaning services and is located adjacent to Camden Town Town Centre. The depot buildings are generally low rise and have a functional appearance, commensurate with their former use.

The allocation looks to optimise the development of the site and maximise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply).

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 63 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 and employment was modelled. It is considered there is potential to retain and extend the existing buildings, in addition to delivering some new build development, and the allocated capacity has been identified on this basis. Any scheme proposing the substantial demolition of the existing buildings would need demonstrate compliance with Policy CC2 Retention of Existing Buildings. No estimated floorspace for the employment use is included in the allocation. However given the existing use of the site and its location, it is considered justified to seek employment uses here as part of a mixed use development.

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 C19 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Heritage. Conservation Areas lie to north and south of site and there is a locally listed public house in close proximity. To mitigate this criterion 4 states that development must ensure it relates successfully to the existing public house on the corner of Arlington Road / Jamestown Road, which is a locally listed building, and avoid any adverse impact on its continuing operation; and criterion 5 states that development must be designed giving careful consideration to scale and massing due to the potential impact on designated conservation areas nearby and neighbouring occupiers.

In addition to the above criteria Policy C19 also sets out other site specific requirements relating to housing provision; design; active frontages; urban greening; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy C19 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 2% 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.

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 C19 is partly located adjacent Primrose Hill and Regents Canal Conservation Areas. There is a Grade II listed terrace on Gloucester Crescent adjacent, and Grade II listed Arlington House near the site on Arlington Road. There are locally listed buildings next to the site on Jamestown Road. 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 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 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 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 specific infrastructure is identified as being considered necessary to support the delivery of the site.

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)

This site now 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 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 now 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. Planning permission has recently been granted for redevelopment 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 SD51 Schedule of main modifications reference MM99.

Site Allocation C20 Highgate Centre, Highgate 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 are set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation C20 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 Central Camden. Policy C1 Central 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 community uses in accordance with Policy C1, 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 2013/5947/P (as amended by 2015/3151/P, 2016/0936/P, 2017/0363/P, 2017/0518/P and 2021/5384/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 use.

The allocated uses reflect the existing community use of the site and aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 (Maximising Housing Supply).

The proposed uses reflect the planning permission 2013/5947/P (as amended by 2015/3151/P, 2016/0936/P, 2017/0363/P, 2017/0518/P and 2021/5384/P) that has been granted on the site. The site is under construction.

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 47 additional homes. This reflects the planning permissions granted for the site. No estimated floorspace for the community use is included in the allocation. However given the existing use on the site it is considered justified to seek a community use here.

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 not included in the housing trajectory as it is under construction and due to complete shortly.

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 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 and development is under construction and nearing completion.

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.

t. Any modifications that are necessary for reasons of soundness

No modifications are considered necessary to this site allocation.

Site Allocation C21 Grand Union House, 18 – 20 Kentish Town 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 C21 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 Central Camden. Policy C1 Central 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, retail floorspace and infrastructure in accordance with Policy C1, 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 (2021/0911/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 employment (office), retail (ground floor) and permanent self-contained homes.

This site is within Camden Town Centre and is currently occupied by employment uses. The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 (Maximising Housing Supply) and Policy H2 (Maximising the supply of housing from mixed-use schemes).

The proposed use also reflects the approved planning permission (2021/0911/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 6 additional homes. This reflects the planning permission that the Council has resolved to grant for the site. No estimated floorspace for the employment (offices) and retail use is included in the allocation. However, given the site is situated in Camden Town Town Centre, it is considered justified to seek commercial uses here as part of a mixed use development.

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 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 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 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 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.

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.

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)

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. A resolution to grant planning permission has recently been issued for the redevelopment of this site and the owners have confirmed their ongoing interest in developing the site as part of the Regulation 19 consultation stage.

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 MM42.

Site Allocation C22 Heybridge Garages, Hadley 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 are set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation C22 was identified through 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes in accordance with Policy C1, 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 (2023/3595/P) for the demolition of the car parking podium to facilitate the delivery of new homes as part of the Council's small sites programme.

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.

The site is currently in use as a car park. The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 (Maximising Housing Supply).

The proposed use reflects the planning permission granted (2023/3595/P) for the demolition of the car parking podium to facilitate the delivery of new homes as part of the Council's small sites programme.

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 the site is 10 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 use was modelled. The allocated capacity is based on the demolition of existing buildings given that planning

permission has been granted to demolish the existing parking podium structure and for the site to be cleared to facilitate development.

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

See the response to e above.

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

See the response to e above.

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 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 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 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.

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)

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.

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 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 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 as part of the small sites programme.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation C23 Former flats 121 – 129 Bacton, Haverstock 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 C23 was identified through 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area and identifies this site as being central to this. It notes that the Council is committed to a programme of estate renewal and regeneration delivered through its Community Investment Programme (CIP).

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 2012/6338/P dated 25/04/2013 (as amended by planning permissions 2014/3633/P, 2015/1189/P and 2016/5358/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 comprehensive re-development of this 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, in accordance with Policy H1 (Maximising Housing Supply). This is in line with the vision in the Gospel Oak and Haverstock Vision SPD.

The allocation reflects planning permissions (2012/6338/P dated 25/04/2013 (as amended by planning permissions 2014/3633/P, 2015/1189/P and 2016/5358/P) which have been approved. The site is under construction and phase 1 has delivered 166 new and replacement homes.

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 148 additional homes. This reflects the planning permissions granted for the site and the phased delivery of homes.

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.)

The key considerations in the policy note that this site is identified as a location where tall buildings may be an appropriate form of development. As this site has planning permission, no further 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

The Camden Building Heights Study (EB34) identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 40m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (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.

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 2028/29 to 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 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

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)

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 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 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.

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 2028/29 to 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 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 Councils Investment Team. Planning permissions have been granted for the site and phased construction has begun. There are ongoing discussions with the community regarding amendments to the latest phase.

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 MM43.

Site Allocation C24 52- 54 Avenue 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 Councils Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations are set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation C24 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes in accordance with Policy C1, 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 2022/1863/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 site is in residential use and is located in a residential area. The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 (Maximising Housing Supply).

The allocated use also reflects the planning permission 2022/1863/P granted on the 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

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.

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 further 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 come forward 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 plans²².

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 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 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.

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.

²² 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 2026/27 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. Planning permission has been granted, and construction is underway on site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation C25 5-17 Haverstock Hill (Eton Garage)

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 C25 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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes, retail floorspace and infrastructure in accordance with Policy C1, 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 2016/3975/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 retail uses.

The allocated uses reflect the existing uses on the site and the location of the site partly within Chalk Farm neighbourhood centre.

The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 (Maximising Housing Supply).

The allocated use reflects planning permission 2016/3975/P which has been granted and implemented.

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 77 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for retail use is included in the allocation. However, given the location of the site and its existing use it is considered justified to seek retail uses here.

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 further 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 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 plans²³.

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 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 specific infrastructure is identified as being considered necessary to support the delivery of the site.

²³ 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 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 2026/27 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. Planning permission has been granted and construction is underway on site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation C26 160 Malden 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 C26 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 Central Camden. Policy C1 Central 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 C1, 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 (2024/1193/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 ground floor offices.

The site is currently in use as an MOT repair centre and carwash. The allocation looks to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 (Maximising Housing Supply).

The allocated uses reflect planning permission (2024/1193/P) that has been granted.

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 15 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the office use is included in the allocation. However, given the existing use of the site and the character of the area it is considered justified to seek employment uses here.

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 further 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 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 plans²⁴.

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 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?

²⁴ 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.

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 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 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 redevelopment of the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation C27 Land adjacent to Constable House, Adelaide 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 C27 was identified through the Gypsy and Traveller Site Identification Study (EB12).

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 Central Camden. Policy C1 Central Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes in accordance with Policy C1, 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 Council's Gypsy and Travellers Site Identification Study (EB12).

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

Objections to this site allocation were received during the Regulation 19 consultation, these are set out in the schedule of representations (SD26 and SD31).

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

The allocation of the land adjacent to Constable House to provide Gypsy and Traveller accommodation is considered to be justified.

Councils have a statutory obligation to plan for the needs of Gypsies and Travellers. The Local Plan identifies that the overall need for Gypsy and Traveller accommodation in Camden over the Plan period to 2041 is 19 additional pitches. This figure includes the four existing pitches that were provided in Camden at the time the assessment was undertaken (see Policy H11).

To inform the approach taken in the Plan to meeting the accommodation needs of Gypsies and Travellers, the Council commissioned Aecom to undertake a Gypsy and Traveller Site Identification Study (EB12 and EB13) in 2023. The purpose of this work was to identify a shortlist of Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.

The Study identified a shortlist of 18 sites, including the land adjacent to Constable House, that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council (with some sites containing more than one parcel of land).

Following this, Council officers undertook a more detailed availability and suitability assessment of the shortlisted sites, including this site, in discussion with other Council teams. As part of the suitability assessment of the sites, officers visited the remaining sites to assess their suitability for the provision of Gypsy and Traveller accommodation.

The findings of this work are set out in Chapter 6 of the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04) and relevant Appendices.

On the basis of this further assessment work and the comments made through the consultation on the Gypsy and Traveller Site Identification Study and those made by other Council services, it was considered that the land adjacent to Constable House was suitable for allocation to help meet the accommodation needs of Gypsies and Travellers.

The allocation of this site to provide 2 Traveller pitches will help to meet the identified need for Gypsy and Traveller accommodation in Camden, in line with national policy, and is therefore considered justified.

Further information about the Council's approach to meeting the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Camden is set out in Topic Paper TP04.

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

This site is allocated to provide 2 Traveller pitches. This is based on a design-led assessment of capacity and illustrated in the indicative site layouts in Appendix 2 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04.

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 Gypsy and Traveller Site Identification Study identified a shortlist of 18 sites, including the land adjacent to Constable House, that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council (with some sites containing more than one parcel of land).

Following this, Council officers undertook a more detailed availability and suitability assessment of the shortlisted sites, including this site, in discussion with other Council teams. As part of the suitability assessment of the sites, officers visited the remaining sites to assess their suitability for the provision of Gypsy and Traveller accommodation. Factors considered as part of this assessment included:

- existing use
- site size / shape / layout
- topography
- physical constraints
- access
- impact on amenity / overlooking
- flood risk
- potential connection to infrastructure
- access to nearby facilities/ services
- potential to re-provide existing uses elsewhere.

The findings of this work are set out in Chapter 6 of the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04) and relevant Appendices.

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 any application for development on this site will be considered against Policy H11 Traveller Accommodation 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 this site is located adjacent to a previously flooded street (Adelaide Road). The majority of the site is identified as being at low risk of surface water flooding, with 35% of the site identified at medium/high risk of surface water flooding (EA Surface Water Flood Risk Map).

In accordance with Local Plan Policy CC10 Flood risk, a site specific flood risk assessment would be required as part of any planning application on this site. The Council considers that any flood risk can be mitigated through the use of sustainable drainage systems.

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 C27 is located near Eton Conservation Area. There is a Grade II listed building adjacent, and locally listed buildings on Adelaide Road. 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

This is a Council owned site and the Council would be responsible for bringing this site forward to deliver Gypsy and Traveller accommodation. The Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04) states that it is expected that this site will come forward in the first five years of the Plan period (2026/27 – 2030/31). It is considered that this timeframe is 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 through transport assessments and statements at the planning application stage where necessary.

It is envisaged that the site will be accessed from Eton College Road, as illustrated in the indicative site layouts in Appendix 2 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04.

The Council's Highways Team have commented that access to the site should be achievable, with their preferred point of access being the one shown on the first indicative site layout drawing in Appendix 2 of TP04 (ie. slightly higher up Eton College Road).

Any planning application on this site would be accompanied by detailed access plans, and issues relating to access would be considered as part of the planning application process.

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.

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

This is a Council owned site, and the Council would be responsible for bringing this site forward to deliver Gypsy and Traveller accommodation. The Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04) states that it is expected that this site will come forward in the first five years of the Plan period (2026/27 – 2030/31). It is considered that this timeframe is realistic.

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 Council would be responsible for bringing forward the delivery of Gypsy and Traveller accommodation on this site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.