

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

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM01		Multiple policies in the Plan	Multiple paragraphs in the Plan	Propose to delete references to 'it can be demonstrated to the Council's satisfaction' or equivalent wording and replace with – relevant and robust evidence is submitted to it can be demonstrated to the Council's satisfaction (or minor variations where necessary for grammatical correctness) This modification will apply to the following policies and paragraphs of the Plan – • Site Allocation S18 (4) • Site Allocation C6, Context, bullet point 2 • Policy H1 Part B (4) • Policy H1 Part B (5) • Policy H1 Part B (6) • Paragraph 7.61 (Policy H2) • Paragraph 7.141 (Policy H4) • Policy H9 Part B (2) • Policy H10 Part B (2) • Policy CC2 Part C • Policy CC2 Part C (2) • Policy CC2 Part E • Policy CC6 Part A (3) • Policy CC6 Part A (4) • Policy CC6 Part C (3) • Policy CC6 Part C (4)	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				• Paragraph 8.83 (Policy CC6) • Policy CC9 Part A (5) • Paragraph 8.155 (Policy CC11) • Policy IE1 Part A (13) • Policy IE3 Part B • Policy IE5 Part C • Paragraph 9.133 (Policy IE9) • Policy IE10 Part A (5) • Policy SC3 Part D (1b) • Policy SC4 Part C (2) • Paragraph 10.70 (Policy SC4) • Paragraph 10.77 (Policy SC4) • Policy SC6 Part B (1) • Paragraph 10.99 (Policy SC6) • Policy SC7 Part B • Policy SC7 Part E • Policy NE2 Part A (1) • Paragraph 11.48 (Policy NE3) • Policy NE3 Part A (7) • Paragraph 11.65 (Policy NE3) • Policy D5 Part P • Paragraph 12.136 (Policy D6)	
MM02		Multiple Policies in the Plan	Multiple paragraphs in the Plan	Propose to delete references to ‘demonstrate to the Council’s satisfaction’ or equivalent wording and replace with – <u>submit relevant and robust evidence to demonstrate to the Council’s satisfaction</u> (or minor variations where necessary for grammatical correctness)	To respond to the action in the Inspector’s Post Hearings Letter ED90 to replace the wording ‘to the Council’s satisfaction’

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				This modification will apply to the following policies and paragraphs of the Plan – • Site Allocation S15 (9) • Paragraph 7.60 (Policy H2) • Paragraph 7.140 (Policy H4) • Policy CC2 Part D • Policy CC4 Part B (1) • Paragraph 8.86 (Policy CC6) • Paragraph 8.127 (Policy CC9) • Policy IE10 Part A (2) • Paragraph 10.57 (Policy SC3) • Policy SC4 Part C (3) • Policy SC6 Part C (2) • Paragraph 10.100 (Policy SC6) • Paragraph 10.116 (Policy SC7) • Paragraph 12.91 (Policy D5) • Policy A4 Part A (5) • Paragraph 13.107 (Policy A4)	
MM03		Multiple Policies in the Plan	Multiple paragraphs in the Plan	Propose the following modification where the phrase ‘justified to the Council’s satisfaction’ is used in the Plan - justified <u>through the submission of relevant and robust evidence</u> to the Council’s satisfaction This modification will apply to the following paragraphs in the Plan – • Paragraph 7.313 (Policy H9) • Paragraph 7.351 (Policy H10) • Paragraph 8.22 (Policy CC2)	To respond to the action in the Inspector’s Post Hearings Letter ED90 to replace the wording ‘to the Council’s satisfaction’

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM04	NMM38		1.17 and 1.18	Propose the following modifications to paragraphs 1.17 and 1.18 – Supplementary planning documents-guidance 1.17 The Council has prepared a number of other documents that provide advice and guidance on how our planning policies will be applied for certain topics, areas or sites, known as Supplementary Planning Documents (SPD). These include: • Camden Planning Guidance – a series of documents that expand on the policies in the Local Plan to provide further guidance on how we will apply our planning policies. These can be viewed on the Council’s website. • Planning Frameworks – a series of briefs and frameworks to help support and guide the redevelopment of specific sites and areas in Camden. These can be viewed on the Council’s website. 1.18 These documents <u>provide informal guidance. They are material considerations in planning decisions but have less do not have the same</u> weight in decision making <u>than as</u> Camden’s development plan documents, but they are important supporting documents and material considerations in planning decisions.	To respond to action 3 in ED89 Actions and Modifications Table
MM05			1.38	Propose the following modification to paragraph 1.38 – Indicative housing capacities are identified for allocated sites. It is important to note that these are indicative and therefore are not fixed figures that must be adhered to exactly. Indicative housing capacities have	To respond to action 70 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				been identified based on adopted area frameworks, neighbourhood plan policies, existing planning permissions and design-led site capacity work. <u>Where site allocations in the Local Plan have an existing planning permission, the housing numbers agreed through the permission will be considered to be the minimum number of homes to be provided in any future scheme.</u>	
MM06			1.39	Propose the following modification to paragraph 1.39 – <u>Policy CC2 Prioritising the retention of existing buildings sets out a presumption in favour of the retention and improvement of existing buildings.</u> Where schemes come forward Schemes that propose substantial or full demolition of existing buildings; <u>applicants on allocated sites</u> will need to comply with the requirements set out in Policy CC2 (Retention of Existing Buildings) , <u>with the exception of schemes that come forward on site allocations S5, S6, S7, S13, S20, C10, C12, C17, W6, and N4, where only Part E of Policy CC2 will apply, as these allocations assume full demolition.</u> If it can be demonstrated to the Council's satisfaction that an existing building cannot be retained and improved upon, and demolition is permitted, then the development capacity of the site will be agreed as part of the planning application process, in accordance with the development plan.	To respond to action 33 in ED89 Actions and Modifications Table
MM07			1.40	Propose the following modification to paragraph 1.40 – <u>The Local Plan seeks to maximise the delivery of permanent self-contained homes across the borough.</u>	To respond to the action in the Inspector's Post Hearings Letter ED90

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>Given this, where a scheme comes forward on a site allocation that proposes a A</u> larger number of homes than <u>set out in</u> the indicative capacity <u>for that site</u>, this may be supported where it is shown that the proposed quantity <u>of development</u> 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. <u>Conversely, where a scheme comes forward on a site allocation that proposes a A</u> lower number of homes than set out in the indicative capacity for that site, this will only be supported where relevant and robust evidence is provided to justify the reduced level of housing provision.may be supported where this can be justified, having regard to the overall supply of housing in the borough compared with housing needs and demonstrable needs for other land uses.	
MM08			Following 1.44	Propose the following modification to insert a new section in the introduction following para 1.44 – <u>Policy requirements for evidence</u> <u>Where a policy in this Plan requires relevant and robust evidence to be submitted as part of a planning application, applicants must submit up to date evidence, referencing relevant standards and/or guidance, and robust data. This must address all material factors relevant to the policy criterion.</u>	To respond to the action in the Inspector's Post Hearings Letter ED90

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM09		Policy S1 – South Camden		Propose the following modification Policy S1 Part Q – The Council will continue to protect the concrete plant at King’s Cross, which is designated as an Aggregates Safeguarding Area on the Local Plan Policies Map. <u>In assessing any proposals for housing or other sensitive land uses in the vicinity of the Aggregates Safeguarding Area, the Council will apply the Agent of Change principle in line with Policy A1 Protecting Amenity.</u>	To respond to action 87 in ED89 Actions and Modifications Table
MM10	MM04	Policy S2 Euston Area		Propose the following modification to Policy S2 to insert a new criterion in Part A after criterion 1 - To realise the vision and objectives set out in the Euston Area Plan, the Council will:.... <u>2. Support the optimisation of development in the Euston area, recognising the opportunity to secure long-term benefits and deliver nationally significant transport infrastructure;</u> Renumber subsequent criterion	For clarity - in response to Lendlease and the Euston Landowners comments (Responder ID 619)
MM11	MM05	Policy S2 Euston Area		Propose the following modification to Policy S2 Part A criterion 3 - expect development to deliver new and replacement employment floorspace across the Euston Area, and support and prioritise the creation and retention of suitable employment floorspace for <u>employment, education,</u> research, learning and knowledge-based	For clarity – to respond to the comments made by UCL (Responder ID 523) and the comments made by Lendlease and the Euston Landowners in their response to the Inspector’s Matters,

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				uses <u>to enhance Euston's role and image in the central London and national economy</u> ;...	Issues and Questions (ED26).
MM12	NMM44	Policy S2 Euston Area	3.19	Propose to insert the following new paragraph after paragraph 3.19 – <u>3.20 Due to the uncertainty around station design and proposals for enabling work at Euston, the Council acknowledges that a degree of flexibility will be necessary in the implementation of policies in the Local Plan and Euston Area Plan, alongside the consideration of wider costs associated with the delivery of constrained sites, and changing economic and market circumstances. This reflects the approach set out in paragraphs 15.34 to 15.36 of this Plan.</u> Renumber subsequent paragraphs.	In response to the comments made by Lendlease and the Euston Landowners in their response to the Inspector's Matters, Issues and Questions (ED26).
MM13	NMM01	Policy S2 Euston Area	3.19 / 3.20	Propose to insert the following new paragraph after the new paragraph 3.20 - <u>3.21 Much of the development capacity at Euston is on land created by the redevelopment of the stations and tracks and as designs for the stations are still emerging, the exact amount of development will be determined by the amount of land that is enabled, and the ability to overcome constraints associated with railway infrastructure, particularly the cost and viability of the complex enabling works. Should new areas for development be identified through design refinement of the stations and / or work to meet the ambition to deliver new homes in the wider Euston area, it may be</u>	To provide further information – in response to Lendlease and the Euston Landowners comments (Responder ID 619)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>possible to deliver in excess of the development identified in Policy S2. Further engagement with local communities will be required.</u> Renumber subsequent paragraphs.	
MM14	MM06	Policy S4 Bloomsbury Campus Area		Propose the following modification to Policy S4, Part A.4 – consolidate, <u>improve</u> and increase academic space	For clarity – to respond to the comments made by UCL (Responder ID 523)
MM15	MM12	Site Allocation Policy S5 120– 136 Camley Street		Propose the following modification to Site Allocation S5 ‘other considerations’ to amend the second bullet point – Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where that work has recently been undertaken. <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development.</u>	To respond to Thames Water comments (Responder ID 409)
MM16		Site Allocation Policy S5 120 – 136 Camley Street		Propose the following modification to Site Allocation S5 to delete the fourth bullet point under ‘other considerations’ and replace with the following wording -	To respond to action 32 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	
MM17	MM13	Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate		Propose the following modification to Site Allocation S6 to insert a new criterion - <u>19. - seek to contribute towards improved access to bus services in the local area.</u>	For clarity – to respond to TfL comments (Responder ID 604)
MM18	MM14	Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate		Propose the following modification to Site Allocation S6 'other considerations' to delete the second bullet point and replace with – Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/or detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be</u>	To respond to Thames Water comments (Responder ID 409)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>necessary and upgrades to the wastewater network may also be required. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	
MM19		Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate		Propose the following modification to Site Allocation Policy S6 to delete the fifth bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM20		Site Allocation Policy S7 24-86 Royal College Street (Parcelforce		Propose the following modification to Site Allocation Policy S7 'indicative housing capacity' – <u>200</u> 280 additional self contained homes	To respond to action 74 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		and ATS Tyre Site)			
MM21	MM15	Site Allocation Policy S7 24-86 Royal College Street (Parcelforce and ATS Tyre Site)		Propose the following modification to Site Allocation S7 'other considerations' to amend the second bullet point – Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where that work has recently been undertaken. <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development.</u>	To respond to Thames Water comments (Responder ID 409)
MM22		Site Allocation Policy S7 24-86 Royal College Street (Parcelforce and ATS Tyre Site)		Propose the following modification to Site Allocation S7 to delete the third bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).	To respond to action 32 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	
MM23		Site Allocation Policy S8 St Pancras Hospital		Propose the following modification to Site Allocation S8 Criterion 4 – be designed to conserve or enhance existing heritage assets, including building, spaces and the adjacent St Pancras Gardens <u>in accordance with Policy D5 (Historic environment)</u> , recognising their contribution to the character of the conservation area, and seek to retain and restore buildings that make a positive contribution in accordance with Policy D5 (Historic Environment);	To respond to action 76 in ED89 Actions and Modifications Table
MM24		Site Allocation Policy S8 St Pancras Hospital		Propose the following modification to Site Allocation S8 Criterion 5 – explore opportunities to create an active and engaging street frontage along Granary Street and St Pancras Way, <u>for example through the inclusion of small scale ground floor retail or food or drink uses for placemaking purposes.</u>	To respond to action 77 in ED89 Actions and Modifications Table
MM25		Site Allocation S8 St Pancras Hospital		Propose the following modification to Site Allocation S8 to add an additional bullet point at the start of the 'other considerations' section – <u>Given that this site allocation involves the delivery of a publicly funded health facility, the Council will not apply</u>	To respond to action 12 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>the provisions of Policy H2 to any development of the remainder of the site.</u>	
MM26	MM17	Site Allocation Policy S8 St. Pancras Hospital		Propose the following modification to Site Allocation S8 'other considerations' to amend the second bullet point – Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where that work has recently been undertaken. <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development.</u>	To respond to Thames Water comments (Responder ID 409)
MM27		Site Allocation Policy S8 St. Pancras Hospital		Propose the following modification to Policy S8 to amend the third bullet point under 'other considerations' to read – Part of the site is within a <u>viewing corridor wider setting consultation area as</u> set out in the London View Management Framework SPG.	To respond to action 78 in ED89 Actions and Modifications Table
MM28	MM86	Policy S8 St Pancras Hospital		Propose the following modification to Site Allocation S8 'other considerations' to insert an additional bullet point under the fifth bullet point -	To reflect that the site is in an Archaeological Priority Area

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	
MM29	MM87	Policy S9 Shorebase Access		Propose the following modification to Site Allocation S9 'other considerations' to insert an additional bullet point under the second bullet point - <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To reflect that the site is in an Archaeological Priority Area
MM30	MM18	Site Allocation Policy S9 Shorebase Access		Propose the following modification to Site Allocation S9, 'other considerations' to remove the second bullet point - Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where that work has recently been undertaken.	To respond to Thames Water comments (Responder ID 409)
MM31		Site Allocation Policy S10 Bangor Wharf and Eagle Wharf		Propose the following modification to Site Allocation S10 criterion 13 – retain or reuse (on site) the granite setts at Bangor Wharf, <u>taking account of their condition.</u>	To respond to action 80 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM32	MM19	Site Allocation Policy S11 Former Royal National Throat, Nose and Ear Hospital		Propose the following modification to Site Allocation S11 'other considerations' to delete the third bullet point and replace with – Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where that work has recently been undertaken. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	To respond to Thames Water comments (Responder ID 409)
MM33		Site Allocation Policy S11 Former Royal National Throat, Nose and Ear Hospital		Propose the following modification to Site Allocation S11 to amend the fifth bullet point under 'other considerations' – The site is within two a viewing corridors <u>and a wider setting consultation area as</u> set out in the London View Management Framework SPG.	To respond to action 79 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM34		Site Allocation Policy S12 Belgrove House		Propose to delete Site Allocation S12 from the Plan. Renumber subsequent site allocations.	The development of this site will be complete by the end of 2026.
MM35		Site Allocation Policy S13 Former Thameslink Station, Pentonville Road		Propose the following modification to Site Allocation S13 to amend the second bullet point under 'other considerations' – <u>Part of the site is within two-a viewing corridors and the whole site is within a wider setting consultation area as set out in the London View Management Framework SPG</u>	To respond to action 79 in ED89 Actions and Modifications Table
MM36		Site Allocation Policy S13 Former Thameslink Station, Pentonville Road		Propose the following modification to Site Allocation S13 to delete the third bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM37	MM20	Site Allocation Policy S16 Former Central		Propose the following modification to Site Allocation S16 'other considerations' to insert an additional bullet point under the first bullet point –	To reflect the existing planning permission

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		St Martins College		<u>Given its special architectural and historic interest, a photographic and recording report relating to the back stage facilities and machinery of the Cochrane Theatre will be required to be submitted, as secured in planning permission 2020/2470/P</u>	
MM38		Site Allocation Policy S19 Cockpit Yard and Holborn Library		Propose the following modification to Site Allocation S19 to amend the third bullet point under 'other considerations' – The site is located within several protected views identified within a viewing corridor and a wider setting <u>consultation area as set out</u> in the London View Management Framework <u>SPG</u> .	To respond to action 79 in ED89 Actions and Modifications Table
MM39		Site Allocation Policy S20 York Way Depot and adjacent land at Freight Lane		Propose the following modification to Site Allocation S20 criteria 6 – ensure that the design and layout of the scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities, <u>including the Aggregates Safeguarding Area identified on the Local Plan Policies Map</u> , in accordance with the Agent of Change principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity);	To respond to action 86 in ED89 Actions and Modifications Table
MM40		Site Allocation Policy S20 York Way Depot and		Propose the following modification to Site Allocation S20 to amend the first bullet point under 'other considerations' –	To respond to action 79 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		adjacent land at Freight Lane		Part of the site is within two-a viewing corridors <u>and part of the site is within a wider setting consultation area as set out in the London View Management Framework SPG.</u>	
MM41		Site Allocation Policy S20 York Way Depot and adjacent land at Freight Lane		Propose the following modification to Site Allocation S20 to delete the second bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM42		Site Allocation Policy S27 Middlesex Hospital Annex 44 Cleveland Street		Propose to delete Site Allocation S27 from the Plan. Renumber subsequent site allocations.	The development of this site will be complete by the end of 2026.
MM43		Site Allocation Policy S29 Charlton Street, Godwin and		Propose to delete Site Allocation S29 from the Plan. Renumber subsequent site allocations.	The development of this site will be complete by the end of 2026.

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		Crowndale Estate			
MM44	MM21	Policy S30 Birkbeck College, Malet Street		Propose the following modification to Site Allocation S30 'allocated uses' – permanent self-contained homes <u>Higher education (academic and ancillary space)</u>	To correct an error in the published Plan
MM45	MM109	Policy C1 Central Camden		Propose to delete and replace the wording in Policy C1 Part K – The Council will continue to support and protect the town centres of Kilburn High Road, Finchley Road/Swiss Cottage and West Hampstead, and the Neighbourhood Centres in the West of the borough, to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors in line with the relevant policies set out in the Plan, with any additional shopping and leisure uses to be provided in accordance with Policy IE6 (Supporting Designated Centres and Essential Services). <u>The Council will manage and protect the stock of offices in the Central area of Camden. Proposals for small to medium-scale office provision will be supported in Camden Town and Kentish Town centres and neighbourhood centres in this area where this is of a commensurate scale for its location, in line with Policy IE2 (Offices).</u>	To correct a typographical error
MM46		Site Allocation Policy C2 Regis Road and		Propose the following modification to Site Allocation C2 to amend the first bullet point under 'other considerations' –	To respond to action 79 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		Holmes Road Depot		Part of the site is within two a -viewing corridors <u>s as</u> identified in the London View Management Framework SPG.	
MM47	MM23	Site Allocation Policy C2 Regis Road and Holmes Road Depot		Propose the following modification to Site Allocation C2 'other considerations' to delete the fifth bullet point and replace with – Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water and waste networks will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	To respond to Thames Water comments (Responder ID 409)
MM48	MM24	Site Allocation Policy C3 Murphy Site		Propose the following modification to Site Allocation C3 'other considerations' to delete the fifth bullet point and replace with –	To respond to Thames Water comments (Responder ID 409)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/or a detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	
MM49		Site Allocation C3 Murphy Site		Propose the following modification to Site Allocation C3 criteria 18 - ensure that the design <u>of any scheme</u> and the materials used are informed by the history of the site, as a former goods railway yard with origins in the mid 19th century, <u>and respect the adjacent listed buildings.</u>	To respond to action 46 in ED89 Actions and Modifications Table
MM50		Site Allocation Policy C4 Kentish Town Police Station		Propose the following modification to Site Allocation C4 'other considerations' to insert an additional bullet point after the first bullet – <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be</u>	Factual update to reflect that the site is in an Archaeological Priority Area

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	
MM51	MM26	Site Allocation Policy C4 Kentish Town Police Station		Propose the following modification to Site Allocation C4 criterion 4 – seek to retain the Section House building in accordance with Policy CC2 (Retention of Existing Buildings) and re-use to provide student accommodation, <u>if no longer needed for police use.</u> Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation)	To respond to the comments made by the Met Police (Responder ID 8)
MM52	MM88	Policy C5 369-377 Kentish Town Road		Propose the following modification to Site Allocation C5 'other considerations' to insert an additional bullet point under the second bullet point - <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To reflect that the site is in an Archaeological Priority Area
MM53	MM89	Site Allocation Policy C5-6 369-377 Kentish Town <u>Fire Station Road</u>		Propose the following modification to Site Allocation C5 <u>6</u> 'other considerations' to insert an additional bullet point under the second bullet point – <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To correct a typographical error. To amend former MM89.

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM54		Site Allocation Policy C10 Juniper Crescent		Propose the following modification to Site Allocation C10 to delete the second bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM55		Site Allocation Policy C12 Gilbeys Yard		Propose the following modification to Site Allocation C12 to delete the third bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM56	MM32	Site Allocation Policy C12 Gilbeys Yard		Propose the following modification to Site Allocation C12 'other considerations' to amend the sixth bullet point - Applicants will be expected to liaise with Thames Water early in the design process <u>to agree whether modelling work is required to understand to investigate</u> whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)
MM57	MM33	Site Allocation Policy C12 Gilbeys Yard		Propose the following modification to Site Allocation C12 'other considerations' to insert new bullet point after the seventh bullet point - <u>Proposals should include a strategy for responding to the National Grid Electricity Transmission (NGET) underground Cable Route present within / adjacent to the site, which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design</u>	To respond to National Grid comments (Responder ID 400)
MM58	MM34	Site Allocation Policy C13 West Kentish Town Estate		Propose the following modification to Site Allocation C13 'other considerations' to delete the second bullet point and replace with the following wording -	To respond to Thames Water comments (Responder ID 409)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/or a detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required</u>	
MM59	MM35	Site Allocation Policy C15 Wendling Estate and St Stephens Close		Propose the following modification to Site Allocation C15 'other considerations' to delete the second bullet point and replace with the following wording - Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/or a detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be</u>	To respond to Thames Water comments (Responder ID 409)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</u>	
MM60	MM36	Site Allocation Policy C16 Shirley House		Propose the following modification to Site Allocation C16 'other considerations' to insert a new bullet point after the fourth bullet point - <u>Proposals should include a strategy for responding to the National Grid Electricity Transmission (NGET) underground Cable Route present within/adjacent to the site, which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design.</u>	To respond to National Grid comments (Responder ID 400)
MM61	MM37	Site Allocation Policy C16 Shirley House		Propose the following modification to Site Allocation C16 'other considerations' to insert a new bullet point after the proposed new fifth bullet point (see MM60 above) - <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development.</u>	To respond to Thames Water comments (Responder ID 409)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM62	MM39	Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 'allocated uses' - Permanent self-contained homes and student accommodation, employment uses (including maker spaces, creative industries and offices), retail, and food and drink uses (on the ground level) <u>and station infrastructure</u>	In response to comments from Places for London / Network Rail (Responder ID 595)
MM63	MM40	Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 criterion 15 – <u>contribute towards, and help deliver, provide</u> step-free access to, <u>and capacity improvements at,</u> Camden Town underground station	To respond to action 55 in ED89 Actions and Modifications Table
MM64		Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 to delete the second bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>Full demolition has been assumed on the basis that station improvement works come forward on this site. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site related to station improvement works. Any</u>	To respond to action 32 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>proposals for development on this site not related to station improvement works will be assessed against Policy CC2 in full.</u>	
MM65	MM41	Site Allocation Policy C18 UCL Campus, 109 Camden Road		Propose the following modification to Site Allocation C18 'other considerations' to amend the third bullet point - Applicants will be expected to liaise with Thames Water early in the design process <u>to agree whether modelling work is required to understand to investigate</u> whether the existing water supply network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)
MM66		Site Allocation Policy C18 UCL Campus, 109 Camden Road		Propose the following modification to Site Allocation C18 to amend the fifth bullet point under 'other considerations' – Part of the site is <u>also</u> within <u>a wider setting consultation area as viewing corridor</u> identified in the London View Management Framework SPG.	To respond to action 79 in ED89 Actions and Modifications Table
MM67		Site Allocation C20 Highgate Centre, Highgate Road		Propose to delete Site Allocation C20 from the Plan. Renumber subsequent site allocations.	The development of this site will be complete by the end of 2026.
MM68	MM42	Site Allocation Policy C21 Grand Union House, 18-20		Propose the following modification to Site Allocation C21 'allocated uses' -	For clarity

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		Kentish Town Road		Employment (office), retail (ground floor) and permanent self contained homes	
MM69		Site Allocation Policy C23 Former flats 121-129 Bacton, Haverstock Road		Propose the following modification to Site Allocation C23 'key considerations' to insert the following wording at the end of the sentence - <u>Development must be designed to respect the setting of the adjacent Grade I listed St Martin's Church.</u>	To respond to action 59 in ED89 Actions and Modifications Table
MM70		Site Allocation Policy C27 Land adjacent to Constable House, Adelaide Rd		Propose the following modification to Site Allocation Policy C27 'allocated uses' – Gypsy and Traveller accommodation <u>Permanent Gypsy and Traveller pitches</u>	To respond to action 60 in ED89 Actions and Modifications Table
MM71	MM44	Site Allocation Policy W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road		Propose the following modification to Site Allocation W2 'other considerations' to delete the third bullet point and replace with the following wording - Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/or a detailed drainage strategy may be required. <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water and waste networks will be necessary. Applicants will be expected to liaise with Thames Water early in the design process</u>	To respond to Thames Water comments (Responder ID 409)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required</u>	
MM72		Site Allocation Policy W6 Land to the rear of Meridian House, 202 – 204 Finchley Road		Propose the following modification to Site Allocation W6 to delete the second bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition of the caretaker's cottage to the rear of Meridian House. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to proposals for this part of the site. The re-development of other parts of the site, including Meridian House, is not envisaged and would need to be justified in accordance with Policy CC2 (Prioritising the retention of existing buildings).</u>	To respond to action 32 in ED89 Actions and Modifications Table
MM73	MM90	Policy W8 88-92 Kilburn High Road		Propose the following modification to Site Allocation W8 'other considerations' to insert an additional bullet point under the second bullet point -	To reflect that the site is in an Archaeological Priority Area

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	
MM74		Site Allocation Policy W11 Abbey Co-op Housing Site		Propose to delete Site Allocation W11 from the Plan. Renumber subsequent site allocations.	To respond to action 92 in ED89 Actions and Modifications Table
MM75		Site Allocation Policy W13 551-557 Finchley Road		Propose to delete Site Allocation W13 from the Plan.	To respond to action 93 in ED89 Actions and Modifications Table
MM76		Site Allocation Policy W14 317 Finchley Road		Propose to delete Site Allocation W14 from the Plan.	To respond to action 94 in ED89 Actions and Modifications Table
MM77	MM47	Site Allocation Policy N3 Queen Mary's House		Propose the following modification to Site Allocation N3 'other considerations' to delete the fourth bullet point – Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)
MM78	MM91	Policy N3 Queen Mary's House		Propose the following modification to Site Allocation N3 'other considerations' to insert an additional bullet point under the fourth bullet point -	To reflect that the site is in an Archaeological Priority Area

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	
MM79		Site Allocation Policy N4 Hampstead Delivery Office		Propose the following modification to Site Allocation N4 'other considerations' to insert an additional bullet point under the second bullet point - <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	Factual update to reflect that the site is in an Archaeological Priority Area
MM80		Site Allocation Policy N4 Hampstead Delivery Office		Propose the following modification to Site Allocation N4 to delete the first bullet point under 'other considerations' and replace with the following wording - Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). <u>The indicative capacity of this site assumes full demolition. Given this, only Part E of Policy CC2 (Prioritising the retention of existing buildings) will apply to schemes on this site.</u>	To respond to action 32 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM81	MM48	Policy H1 Maximising Housing Supply		Propose the following modification to Policy H1 Part A – The Council will aim to deliver at least 11,550 additional homes from 2026/27 to 2040/41. <u>This includes the final three years of the London Plan 2021 housing target for Camden (1,038 homes per year for years 2026/27, 2027/28 and 2028/29 of the Plan period).</u>	To respond to the comments from the GLA (Responder ID 13)
MM82		Policy H1 Maximising housing supply		Propose the following modification to Policy H1 Part B 2 – supporting other forms of permanent housing to meet more specific needs, such as purpose-built student accommodation, <u>housing with shared facilities (including large-scale purpose-built shared living)</u>, and housing for people with care or support requirements	To respond to action 11 in ED89 Actions and Modifications Table
MM83		Policy H1 Maximising housing supply	7.25	Propose the following modification to paragraph 7.25 – If an alternative permanent housing use is proposed on a site identified for permanent self-contained housing, the Council will expect the submission of <u>relevant and robust</u> evidence to demonstrate that there is no <u>realistic reasonable</u> prospect of a viable development for permanent self-contained housing coming forward <u>within the Plan period in the short to medium term</u>. If an alternative non-housing use is proposed on any site identified for permanent housing, the Council will expect the submission of evidence to demonstrate that there is no <u>realistic reasonable</u> prospect of a viable development for any form of permanent housing	To respond to action 72 in ED89 Actions and Modifications Table and the action in the Inspector's Post Hearings Letter ED90

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				coming forward within the Plan period <u>in the short to medium term</u> ...	
MM84		Policy H1 Maximising housing supply	7.29	Propose the following modification to paragraph 7.29 – Where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for permanent housing (prioritising self-contained housing) unless: - the Plan seeks to protect existing uses on site, such as business premises, community uses and shops; - the site is needed to meet other plan priorities for the area, particularly in the Hatton Garden area and other parts of the Central Activities Zone; - the site is identified for another use in a development plan document; or - it is demonstrated <u>through the submission of relevant and robust evidence to the satisfaction of the Council</u> that the site is unsuitable for permanent housing (e.g. in terms of the amenity of occupiers) or there is no reasonable realistic prospect of a viable development for permanent housing coming forward within the Plan period <u>in the short to medium term</u>.	To respond to action 72 in ED89 Actions and Modifications Table and the action in the Inspector's Post Hearings Letter ED90
MM85		Policy H4 Maximising the supply of affordable housing		Propose the following modification to Policy H4 Part A - The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable <u>homes</u>. The Council will:	To respond to action 10 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>1. follow the London Plan's threshold approach to applications, subject to the provisions in Parts B to F below;</u> <u>2. aim to maximise the supply of affordable housing, to meet or exceed a borough wide delivery target of 3,000 additional affordable homes from 2026/27 - 2040/41;</u> and <u>3. aim to</u> achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing."	
MM86		Policy H4 Maximising the supply of affordable housing		Propose the following modification to Policy H4 Part B (5) - in the case of larger developments, the London Plan's strategic affordable housing target of 50% threshold approach to applications will apply, but will be subject to the London Plan's viability threshold approach;	To respond to action 10 in ED89 Actions and Modifications Table
MM87		Policy H4 Maximising the supply of affordable housing	Before para 7.105	Propose to insert two new paragraphs after paragraph 7.105 - <u>In seeking the delivery of affordable housing in Camden, the Council will follow the London Plan's threshold approach to applications, as set out in paragraphs 7.118 to 7.121 below. The London Plan sets out how the Mayor's powers will be used to seek delivery of more affordable housing than would arise directly from the threshold approach. These powers include the use of grant to fund the delivery of additional affordable homes, and the use of Mayoral influence on public land holdings to deliver 50%</u>	To respond to action 6 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>affordable housing across the entire portfolio (but not necessarily on individual sites).</u> <u>In the context of Camden, the Council does not expect that the 50% strategic target will be met across the Plan period. Factors that would prevent delivery of 50% of homes as genuinely affordable in Camden include the following:</u> <u>a high proportion of the homes in the borough are delivered from sites which each involve fewer than 10 additional homes and where on-site delivery of affordable housing is not sought (25% of homes completed from 2015-2025);</u> <u>Camden has existing high land values and a corresponding high cost of delivering affordable homes, which limits the potential for grant funding to bring forward additional affordable homes;</u> <u>there are relatively few public land holdings in the borough that the Mayor can influence to increase affordable housing delivery (for example, there are no London Underground or Transport for London rail depots)."</u> Renumber subsequent paragraphs.	
MM88		Policy H4 Maximising the supply of affordable housing	Before para 7.118	Propose a modification to amend sub-heading " Larger developments and the London Plan's <u>Viability threshold approach to applications</u> "	To respond to actions 6 and 10 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM89		Policy H4 Maximising the supply of affordable housing	7.118	Propose the following modification to paragraph 7.118 and the insertion of a new paragraph after 7.118 - As set out in Part B of Policy H4, larger developments are considered to be those with capacity for 16 additional homes or more. Under our approach to capacity assessment, these will generally be developments involving an additional housing floorspace of 1,550 sqm GIA or more. For larger developments, the London Plan's strategic affordable housing target will apply, but will be considered in tandem with the London Plan's viability threshold approach <u>to applications will apply.</u> <u>The London Plan's thresholds refer to the percentage of affordable housing that must be provided to avoid the requirement to submit a financial viability appraisal justifying the proportion of affordable housing proposed as part of a planning application. The Local Plan refers to these as viability thresholds to distinguish them from the affordable housing threshold at which the requirement for a contribution to affordable housing commences.</u> Renumber subsequent paragraphs.	To respond to actions 6 and 10 in ED89 Actions and Modifications Table
MM90		Policy H4 Maximising the supply of affordable housing	7.119	Propose the following modification to paragraph 7.119 and the insertion of a new paragraph after 7.119 - The Council will operate the London Plan viability thresholds prevailing at the time of determining an application, taking into account the proportion of floor	To respond to actions 6 and 10 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				area and the proportion of habitable rooms in each tenure. For developments that must be referred to the Mayor under the provisions of the relevant legislation, the proportion of habitable rooms in each tenure will be the primary consideration. The London Plan indicates that where the proportion of affordable housing reaches or exceeds the relevant threshold level, <u>The London Plan indicates that where the proportion of affordable housing reaches or exceeds the relevant threshold level, an application can follow the fast-track route, subject to meeting further requirements specified in the London Plan. For an application following the fast track route:</u> • there is no requirement to submit a financial viability appraisal in support of the application; but that • if construction has not adequately progressed after a specified period (usually two years after permission is granted), an early stage viability review will be sought to indicate whether there is potential for any additional affordable housing contribution." <u>Where the proportion of affordable housing fails to reach the relevant threshold level, the London Plan indicates that an application must follow the viability-tested route. Details of the requirements associated with viability testing are provided in paragraphs 7.154 to 7.156 below.</u> Renumber subsequent paragraphs.	

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM91		Policy H4 Maximising the supply of affordable housing	7.155	Propose the following modification to paragraph 7.155 – Where financial viability constraints prevent the development from meeting the affordable housing target, and there is a prospect of viability improving prior to delivery, the Council will expect a viability review (or reviews) subject to the London Plan's viability threshold approach, and will seek an increased affordable housing contribution if viability improves over time. <u>For schemes following either the London Plan fast track or viability tested routes, we will seek an early stage viability review at a specified period (usually two years after permission is granted).</u> For schemes <u>defined by following</u> the London Plan's <u>as</u>-viability tested <u>routes</u>schemes, the Council will <u>also</u> expect a late stage viability review to take place when costs and receipts are known as far as possible. For schemes defined by the London Plan as fast track schemes, we will seek an early stage viability review at a specified period (usually two years after permission is granted). In the case of long-term schemes where phased implementation is anticipated, we may also seek mid-term viability reviews prior to implementation of later phases.	To ensure consistency with London Plan Policy H5, and clarify that an early stage review is also sought for schemes following the viability tested route.
MM92		Policy H9 Purpose-built student accommodation		Propose the following modification to Policy H9 Part B(1) - The Council will seek a supply of student housing to meet or exceed Camden's target of 200 additional places in student housing per year and will support the	To respond to action 14 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				development of student housing provided that the development: 1. will not involve a disproportionate loss of self-contained homes (particularly homes with 3 bedrooms), having regard to the overall addition to housing supply; will not involve the net loss of 2 or more self-contained homes (particularly homes with 3 bedrooms), unless relevant and robust evidence is submitted to the Council to demonstrate that the loss of self-contained homes will be outweighed by the significant contribution the proposal makes to both overall housing supply and meeting identified housing needs;	
MM93		Policy H9 Purpose-built student accommodation	7.283	Propose the following modification to paragraph 7.283 – Policy H1 indicates that self-contained housing is the priority land use of this Plan, while Policy H3 (Protecting existing homes) resists proposals involving the net loss of self-contained homes. In addition, <u>the Census 2021 indicates that only 20% of Camden's existing households occupy three bedroom homes and</u> Camden's Local Housing Needs Assessment indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a three bedroom home. Nevertheless, additional student accommodation contributes towards meeting our housing target (with 2.5 student rooms treated as equivalent to one home), addresses a permanent housing need, and can reduce the pressure for students to share existing large homes. Balancing these considerations, the Council will seek to minimise	To respond to action 14 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				the loss of self-contained homes, <u>particularly those</u> with 3 bedrooms, and expect any student housing developments that involve <u>the loss of two or more</u> self-contained homes to create a <u>significant</u> net positive contribution to meeting the borough's housing target, <u>and meeting the specific housing needs identified by this Plan. In calculating the net effect of the proposal the Council will apply the conversion ratio set out in the London Plan (which is currently 2.5:1, where 2.5 student rooms is treated as equivalent to one home).</u> Renumber subsequent paragraphs.	
MM94		Policy H9 Purpose-built student accommodation	7.284	Propose the following modification to paragraph 7.284 – In preparing the Local Plan we have assessed the most suitable uses for each allocated site, and have identified several allocations where student accommodation could be provided. Where planning permission has been granted for self-contained housing, self-contained housing has been assessed as a suitable and deliverable use. Given that permanent self-contained housing is this Plan's priority land-use, the Council will resist the development of student accommodation on a site allocated for self-contained homes, or a site that has an existing consent for self-contained housing, unless evidence is submitted to demonstrate that there is no reasonable <u>realistic</u> prospect of a viable development for permanent self-contained housing coming forward <u>within the Plan period in the short to medium term.</u>	To respond to action 72 in ED89 Actions and Modifications Table and the action in the Inspector's Post Hearings Letter ED90

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM95		Policy H10 Housing with shared facilities (including large-scale purpose-built shared living)		Propose the following modification to Policy H10 Part B(1) – The Council will support development of housing with shared facilities provided that the development: 1. will not involve a disproportionate loss of self-contained homes (particularly homes with three bedrooms), having regard to the overall addition to housing supply; <u>will not involve the net loss of 2 or more self-contained homes (particularly homes with 3 bedrooms), unless relevant and robust evidence is submitted to the Council to demonstrate that the loss of self-contained homes will be outweighed by the significant contribution the proposal makes to both overall housing supply and meeting identified housing needs;</u>	To respond to action 14 in ED89 Actions and Modifications Table
MM96		Policy H10 Housing with shared facilities (including large-scale purpose-built shared living)	7.330	Propose the following modification to paragraph 7.330 – Policy H1 indicates that self-contained housing is the priority land-use of the Plan, while Policy H3 resists proposals involving the net loss of self-contained homes. In addition, <u>the Census 2021 indicates that only 20% of Camden's existing households occupy three bedroom homes and</u> Camden's Local Housing Needs Assessment indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a 3 bedroom home. Nevertheless, additional housing with shared facilities contributes towards meeting our housing target, addresses a permanent housing need, and can reduce the pressure	To respond to action 14 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				for unrelated adults to share existing large homes. Balancing these considerations, the Council will seek to minimise the loss of self-contained homes, <u>particularly those</u> with 3 bedrooms, and expect any development of shared accommodation that involves <u>the</u> loss of <u>two or more</u> self-contained homes to create a <u>significant</u> net positive contribution to meeting our housing target, <u>and meeting the specific housing needs identified by this Plan. In calculating the net effect of the proposal the Council will apply the conversion ratio set out in the London Plan (which is currently 1.8:1, where 1.8 bedrooms/units is treated as equivalent to one home).</u> Renumber subsequent paragraphs.	
MM97		Policy H10 Housing with shared facilities (including large-scale purpose-built shared living)	7.331	Propose the following modification to paragraph 7.331 – Where we have allocated sites specifically for self-contained housing in the Local Plan, or have granted permission for self-contained housing, we consider this to be a suitable and deliverable use. Given this Plan's priority land-use, the Council will resist proposals for the development of housing with shared facilities on a site allocated for self-contained homes, or a site that has an existing consent for self-contained housing, unless evidence is submitted to demonstrate that there is no <u>reasonable realistic</u> prospect of a viable development for permanent self-contained housing coming forward <u>within the Plan period in the short to medium term.</u>	To respond to action 72 in ED89 Actions and Modifications Table and the action in the Inspector's Post Hearings Letter ED90

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM98	MM49	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part A – The Council will aim to secure a sufficient supply of pitches / plots to meet the accommodation needs of Camden's established Traveller community over the Plan period to 2041. <u>This includes a target of 13 additional pitches by 2035/36.</u>	To accord with London Plan Policy H14
MM99	MM50	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part C – To help meet the accommodation needs of Camden's established Traveller community the following sites have been allocated in the Local Plan to deliver <u>six</u> permanent Traveller pitches:...	For clarity – in response to comments from London Gypsies and Travellers (Responder ID 294)
MM100	MM51	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part D – <u>The Council will support the delivery of windfall sites to help meet the accommodation needs of Camden's Traveller community.</u> The Council will require new sites, pitches and/or plots for Travellers to:	To respond to the comments from the GLA (Responder ID 13)
MM101		Policy H11 – Accommodation for travellers		Propose the following modification to Policy H11 Part D (7) – be attractive and of the highest design quality;	To respond to action 15 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM102	MM52	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11 Part D (following criterion 8) - <u>9. be designed in consultation with representatives of the local Traveller community. Applications for new sites, pitches and/or plots for Travellers should be accompanied by a detailed Management Plan.</u>	For clarity – in response to comments from London Gypsies and Travellers (Responder ID 294)
MM103	MM54	Policy H11 Accommodation for travellers	7.364	Propose to insert a new paragraph after paragraph 7.364 – <u>It is envisaged that the land adjacent to Constable House (Site Allocation C27) could accommodate two Gypsy and Traveller pitches and that the land at York Way Depot and adjacent land at Freight Lane (Site Allocation S20) could accommodate up to four Gypsy and Traveller pitches. However, further design and feasibility work will be required to establish the exact number of pitches that can be delivered on these sites. A further pitch has also recently been provided on the existing Traveller site at Carol St in Camden, which also counts towards meeting the identified need. This means there is a shortfall of 6 pitches against the Council's ten year pitch target of 13 pitches to 2035/36. Given this, Policy H11 supports the delivery of windfall sites (unallocated sites) to help meet this need subject to the criteria set out in Policy H11 Part D.</u> Renumber subsequent paragraphs.	To respond to the comments from the GLA (Responder ID 13)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM104	MM55	Policy CC2 Prioritising the retention of existing buildings		Propose the following modification to Policy CC2 Part B – Developers considering the substantial demolition of existing buildings will be expected to undertake the following assessments, before progressing detailed proposals for submission: 1. a condition and feasibility assessment, which should be undertaken at the earliest opportunity; and 2. <u>a</u> development options appraisal, <u>where appropriate</u>, which should...	For clarity – to respond to comments made by the London Property Alliance (Responder ID 637) and others
MM105	MM56	Policy CC2 Prioritising the retention of existing buildings		Propose the following modification to Policy CC2 Part C – The Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council's satisfaction that: 1. there are significant structural issues with the existing building that would prevent it from being retained and improved; <u>or</u> 2. the developer has comprehensively explored a range of feasible alternative development options, informed by the condition and feasibility assessment, prior to considering substantial demolition, and it has been demonstrated to the Council's satisfaction that the existing building cannot be retained or improved; <u>and</u> 3. the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and optimises site capacity.	For clarity - to respond to comments made by the London Property Alliance (Responder ID 637) and others

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM106	MM57	Policy CC2 Prioritising the retention of existing buildings	8.15	Propose to insert the following new paragraph after paragraph 8.15 – <u>Furthermore, where the condition and feasibility assessment shows that there may be significant structural issues present, which mean the retention of the existing building is not feasible, a development options appraisal will not be required.</u> Renumber subsequent paragraphs.	For clarity - to respond to comments made by the London Property Alliance (Responder ID 637) and others
MM107	NMM09	Policy CC2 Prioritising the retention of existing buildings	8.24	Propose the following modification to the fourth bullet point in paragraph 8.24 – When assessing whether the proposal constitutes the best use of the site the Council will consider:..... • public benefit, including but not limited to, the delivery of social and community infrastructure, open space, active travel measures, <u>public transport infrastructure</u>, affordable workspace, a significant uplift in jobs and estate regeneration;	For clarity – to respond to comments made by Places for London (Responder ID 595)
MM108	MM59	Policy CC4 Minimising Carbon Emissions		Propose the following modification to Policy CC4 Part B – ...major development or and all development proposing substantial demolition to submit a Whole Life Cycle Carbon (WLC) emissions assessment.	For clarity – to respond to comments from Unite (Responder ID 618)
MM109	MM60	Policy CC4 Minimising		Propose to insert a new Part to Policy CC4, following Part B –	To align with London Plan Guidance on Whole Life Carbon

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		carbon emissions		<u>C. All major development will be required to submit a post construction Whole Life Cycle Carbon Assessment in line with London Plan Guidance on Whole Life Carbon Assessments.</u>	Assessment - to respond to comments from Unite (Responder ID 618)
MM110	MM61	Policy CC4 Minimising carbon emissions	8.52	Propose to insert the following text at the end of paragraph 8.52 – <u>Where the Council considers an applicant has not fully assessed the whole life carbon of a proposal, an independent review of the Whole Life Cycle Carbon Assessment will be requested, to be paid for by the developer. The recommendations of the assessment should be implemented where feasible.</u>	To provide further information - to respond to comments from Hilson Moran (Responder ID 507)
MM111	MM111	Policy CC6 Energy use and the generation of renewable energy		Propose the following modification to Policy CC6 Parts A.2 and A.3 – 2. be designed to use as little energy as possible to heat them. Developers <u>Development</u> should achieve a space heating demand of 20 or less kWh/m2 GIA/yr (kilowatt hour per square metre of gross internal area per year); 3. minimise total energy use. For each of the building types set out below (or the nearest equivalent), the Council will expect development to meet the Energy Use Intensity targets set out below, unless it is demonstrated to the Council's satisfaction that it is not feasible: a. residential buildings - 35 kWh/m2 GIA/yr; b. offices, Retail, Higher Education Teaching facilities, GP surgeries - 70 kWh/m2 GIA/year;	To correct a typographical error in A.2 and to update A.3 to respond to the additional viability testing of draft policy CC6 (ED67) and the response from Unite to the Inspector's Matters Issues and Questions (ED54).

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				c. student accommodation; care homes, extra care homes – 35-62 kWh/m2 GIA/year; d. care homes – <u>124 kWh/m2 GIA/yr;</u> de. hotels - 160 kWh/m2 GIA/year; ef. light industrial units - 35 kWh/m2 GIA/year; and fg. schools - 65 kWh/m2 GIA/year.	
MM112		Policy CC6 – Energy use and the generation of renewable energy	8.90	Propose the following modification to paragraph 8.90 - Developments covered by Part A and Part C of Policy CC6 will be required to submit an Energy Statement to demonstrate to the Council's satisfaction that energy savings have been maximised through energy efficient design, low carbon heat, and the generation of renewable energy on-site.	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM113	NMM16	Policy CC8 Overheating and cooling	8.113	Propose the following modification to paragraph 8.113 – Other measures that could be used to reduce the overheating risk in buildings and the spaces around buildings include: - controlling solar gain (through window design – considering size, properties of the glass used, depth of window reveal, and window openings); <u>using materials with a high thermal mass to absorb and retain heat produced by the sun. These materials can be used to regulate indoor temperatures, especially to keep inside spaces cool during the day;</u> - shutters and blinds;...	To provide further information - to respond to comments from the Highgate Society (Responder ID 649)

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM114	NMM17	Policy CC8 Overheating and cooling	8.113	Propose the following modification to the tenth bullet point of paragraph 8.113 – • maximising green landscaping <u>and blue infrastructure, such as green and blue roofs and rain gardens</u> (see policies in the Natural Environment Chapter).	To provide further information - to respond to comments from Redington Frognaal Neighbourhood Forum (Responder ID 251)
MM115	MM62	Policy CC9 Water efficiency		Propose the following modification to Policy CC9 Part A 2 – require all residential development to meet the optional requirement for water efficiency set out in Part G of the Building Regulations of 110 litres per person per day (including 5 litres for external water use), <u>or any higher standard that may be adopted</u> . Proposals will be strongly encouraged to reduce daily water use even further than this where possible;	For clarity – to respond to comments from Thames Water (Responder ID 409)
MM116	MM63	Policy CC9 Water efficiency	8.124	Propose the following modification to paragraph 8.124 to insert the following text after the fifth bullet point – <u>The Council will expect developers to demonstrate that they have taken a fittings-based approach to comply with the optional requirement for water efficiency in Part G of the Building Regulations, as set out in Table 2.2 of the Regulations.</u>	For clarity – to respond to comments from Thames Water (Responder ID 409)
MM117	MM64	Policy CC11 Sustainable drainage		Propose the following modification to Policy CC11 Part E – In the Counters Creek catchment area (shown on the Planning Policies Map) applications for basement	For clarity – to respond to comments from Thames Water (Responder ID 409) and Redington Frognaal

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				development, and other development vulnerable to flooding in areas identified at risk of flooding, should seek to reduce surface water run-off rates to be as close to <u>go beyond</u> the greenfield run-off rate as <u>where</u> feasible.	Neighbourhood Forum (Responder ID 251)
MM118	NMM19	Policy CC11 Sustainable drainage	8.162	Propose the following modification to paragraph 8.162 – Applications for basement development and other development vulnerable to flooding in areas identified at risk of flooding in the Counters Creek catchment area, should therefore seek to reduce surface water run-off rates to be as close to <u>go beyond</u> the greenfield run-off rate as <u>where</u> feasible.	For clarity – to respond to comments from Thames Water (Responder ID 409)
MM119	MM79	Policy IE2 Offices		Propose the following modification to Policy IE2 Part C – The loss of offices in the borough will only be considered acceptable where a comprehensive and sustained marketing campaign has been undertaken for at least 12 months, which uses a variety of agents <u>which uses at least one recognised agent with appropriate and relevant expertise</u> and is based on a realistic rent.	To provide greater flexibility – in response to Q8 in Matter 5 of the Inspector's Matters, Issues and Questions
MM120		Policy IE2 Offices		Propose the following modification to Policy IE2 Part C – The marketing evidence should <u>robustly</u> demonstrate that suitable economic uses have been fully explored	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				and evidenced to the Council's satisfaction , with consideration given to the feasibility and viability of the following:...	wording 'to the Council's satisfaction'
MM121	MM80	Policy IE2 Offices	9.36	Propose the following modification to Paragraph 9.36 – The Council has an established process for dealing with situations where offices become obsolete. In such cases, we will expect the provision of marketing evidence to show that there is no potential interest from occupiers and that marketing has been undertaken based on a realistic rent (guided by average local market values for similar space). As a minimum, the marketing should be conducted over a 12-month period and by at least two <u>one</u> agents with knowledge of local property markets <u>and a track record in the sale and letting of offices.</u>	To provide greater flexibility – in response to Q8 in Matter 5 of the Inspector's Matters, Issues and Questions
MM122		Policy IE2 Offices	9.37	Propose to delete paragraph 9.37 and replace it with the text below – As stated, significant elements of the office market continue to perform well in Camden and far greater emphasis is being placed on workspace quality and building performance. It is important to guard against the wholesale loss of office floorspace where these issues are capable of being addressed to maintain jobs and facilitate future economic growth. Some neighbourhood plans and the London Plan seek to protect small office capacity in centres. Developers may therefore be asked to provide viability evidence to	To respond to actions 17 and 19 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				show that the refurbishment of a building to enable its continuing office use is not possible. This is particularly the case where premises appear to require relatively small-scale interventions such as improved accessibility or renewed fittings (lighting, cabling for broadband etc.). <u>As part of the marketing exercise the Council will expect applicants to explore whether:</u> <u>the premises could be refurbished or modernised to enhance its attractiveness to potential occupiers. The marketing report should provide evidence to demonstrate that the applicant has fully explored the option of refurbishing and modernising the premises. Where this option has been discounted, a robust justification should be provided in the report to explain why it is not feasible. Where the Council considers that the evidence provided is not relevant and robust, applicants may be asked to provide viability evidence to show that the refurbishment of a building to enable its continuing office use is not possible. This is particularly the case where premises appear to require relatively small-scale interventions such as improved accessibility or renewed fittings (lighting, cabling for broadband etc.);</u> <u>discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements could be used to increase market interest. The marketing report submitted to the Council should detail the steps</u>	

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>taken to secure target occupiers over the 12 month period;</u> • <u>the premises could be re-configured to meet the demands of growth sectors and smaller businesses, including studios, start-ups and micro businesses. The marketing report should set out why any identified deficiencies in the premises are limiting market demand and demonstrate that the applicant has fully explored the feasibility of these being overcome through refurbishment and/or works to the premises. This evidence should relate to the specific characteristics and constraints of the individual property, including heritage significance, rather than relying on wider market trends.</u> <u>Where there is a proposal for an alternative employment use that would provide benefits for small and medium-sized enterprises in terms of access to affordable or low cost workspace, the Council will apply the approach to marketing and viability evidence flexibly, subject to other relevant Local Plan policies.</u>	
MM123		Policy IE2 Offices	9.39	Propose the following modification to paragraph 9.39 - Where office buildings become redundant the Council's preferred alternative use is housing. We will also support the conversion of offices to student accommodation <u>and the reuse of office buildings for education use in the Bloomsbury Campus Area.</u> The ability to deliver...	To respond to action 16 in ED89 Actions and Modifications Table
MM124	NMM22	Policy IE2 Offices	9.40	Propose to insert the following text as a new paragraph, after paragraph 9.40 –	To provide further information on our

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>There are a number of large cultural, educational and health institutions in the borough, particularly within the Central Activities Zone where office and administrative space form part of their estate. Some of these bodies have estate plans identifying the potential need to change the use of different buildings over time to meet changing priorities and demands. Where the proposed development is publicly funded or otherwise serves an acknowledged public purpose, we will consider reducing the period of the marketing exercise or waiving this requirement, provided the space will continue to be used by the institution to deliver its offer. This does not remove the Council's requirement for such schemes to make a financial contribution towards the loss of employment space.</u> Renumber subsequent paragraphs.	approach – in response to comments from the British Museum (Responder ID 594)
MM125		Policy IE3 Industry	9.49	Propose the following modification to paragraph 9.49 - It is therefore assumed that other than the sites allocated for intensification or development in the Local Plan, the vast majority of the remaining stock of non-allocated industrial sites serve a valuable economic function and therefore, will continue to have an important role in contributing to local economic need. <u>The Council recognises that there are other uses that may be similar to 'traditional' B2 and B8 industrial land uses, such as sui generis uses of a similar nature and light industrial activities in use Class E. Subject to other relevant Local Plan policies, the Council will support</u>	To respond to action 20 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>proposals for the location of such uses on non-designated industrial land, particularly where this involves local growth sectors, such as the creative industries, improves access to affordable or low cost workspace for small and medium-sized enterprises, and would not be prejudicial to maintaining the borough's industrial capacity over the long-term. Given this, oOther</u> land uses (including offices) will generally be resisted on these sites except where thorough evidence has been presented to show that the potential for the site to remain in industrial <u>or similar use</u> is low. Applicants will therefore be expected to provide marketing evidence in line with the approach for offices in Part C of Policy IE2 and demonstrate through viability evidence why there is no realistic option for retaining an industrial <u>or similar use</u>, including, where relevant, through the upgrading and refurbishment of premises. Any viability assessment should be prepared with input from agents with specialist knowledge of industrial land markets.	
MM126	MM112	Policy IE4 Affordable Workspace		Propose the following modification to Policy IE4 Part A.2 – The Council will: seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years, <u>subject to viability</u>; and	For clarity
MM127	NMM56	Policy IE6 Supporting designated	9.101	Propose the following modification to paragraph 9.101 –	For clarity

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		centres and essential services		The Council will continue to actively monitor changes in centres through undertaking periodic retail surveys (with the findings hosted on Camden Open Data). <u>These collect data on the mix of uses and overall number of vacancies within centres and provide a mechanism for comparing the health of centres in Camden.</u>	
MM128		Policy IE9 Delivery-led Food Businesses	9.130	Propose the following modification to paragraph 9.130 – These are generally internet-based services and are popular due to their convenience and rapid delivery times. <u>This policy does not apply to ‘production kitchens’, which prepare food to be consumed in restaurants.</u>	To respond to action 23 in ED89 Actions and Modifications Table
MM129		Policy SC1 Improving health and wellbeing	10.13	Propose the following modification to paragraph 10.13 - Health Impact Assessments will also be required for non-major applications considered to have the potential to give rise to significant adverse health impacts, <u>for example hot food take aways, delivery-led food businesses and betting shops,</u> and for non-major developments involving sensitive uses such as education, health, leisure or community facilities, <u>and</u> publicly accessible open space, hot food take aways, betting shops and in areas where air pollution and noise issues are particularly prevalent.	To respond to action 24 in ED89 Actions and Modifications Table
MM130		Policy SC5 Food growing		Propose the following modification to Policy SC5 Part A (2) -	To respond to action 26 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				seek to secure the on-site provision of suitable space for food growing by residents as part of all major housing developments and mixed use developments incorporating housing. Where provision cannot be made on-site, a financial contribution will be sought to deliver off-site community food growing projects. <u>This contribution will form part of the overall open space requirement generated by the development under Policy SC4 (Open Space).</u>	
MM131	MM65	Policy SC6 Cultural facilities		Propose the following modification to Policy SC6 Cultural facilities Part D – Where a proposal includes a new or relocated cultural facilities, or additional floorspace, the Council will expect require the applicant to provide the following, where appropriate :	For clarity - in response to comments from the British Museum (Responder ID 594)
MM132	MM83	Policy SC6 Cultural facilities	10.103	Propose to insert a new paragraph following paragraph 10.103 - <u>In order to assess the impact of a proposal for a new or relocated cultural facility or additional floorspace, the Council will expect the applicant to provide evidence in line with Part D of Policy SC6. The Council recognises however that the level of evidence required to make a robust assessment will vary dependant on the nature and scale of the proposal, with a greater level of evidence required to support a proposal for a new cultural facility, compared to the delivery of additional floorspace at an existing cultural facility. Given this, the Council will encourage applicants to take a</u>	For clarity – in response to Q14 in Matter 6 of the Inspector's Matters, Issues and Questions

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				<u>proportionate approach when providing evidence in accordance with Part D of Policy SC6.</u> Renumber subsequent paragraphs.	
MM133	MM66	Policy NE2 Biodiversity		Propose the following modification to Policy NE2 Part A.5 – expect suitable developments to integrate measures to support wildlife, including swift bricks, bat/bird boxes, bee bricks and permeable fencing <u>garden borders, such as hedges.</u>	For clarity - to respond to comments from Redington Frognal Neighbourhood Forum (Responder ID 251)
MM134		NE3 Tree Planting and Protection	11.57	Propose the following modification to paragraph 11.57 – These measures should be agreed with the Council prior to commencement and implemented <u>in accordance with the agreed plans and strategy to the Council's satisfaction.</u>	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM135	MM67	Policy D1 Achieving design excellence		Propose the following modification to Policy D1 Part A – All development in Camden must achieve excellence in the architecture and design of buildings and places, responding to the climate <u>and ecological</u> emergency, improving the health and well-being of our communities, and celebrating Camden's diversity of people and place.	For clarity - to respond to comments from Redington Frognal Neighbourhood Forum (Responder ID 251)
MM136	MM68	Policy D1 Achieving		Propose the following modification to Policy D1 Part D –	For clarity - to respond to comments from

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
		design excellence		Developers must evidence how they have responded positively to the design policies in the Local Plan, and associated guidance <u>and any relevant Neighbourhood Plan</u> , as part of the Design and Access Statement submitted with their planning application.	Redington Frognal Neighbourhood Forum (Responder ID 251)
MM137	MM69	Policy D1 Achieving design excellence		Propose the following modification to Policy D1. Part B.3 – preserve <u>conserve</u> or enhance the historic environment and heritage assets in accordance with Policy D5 (Historic Environment);	To ensure consistency in wording across the Plan - in response to comments from the British Museum (Responder ID 594)
MM138	MM85	Policy D1 Achieving Design Excellence		Propose the following modification to criterion B4 of Policy D1 - respect <u>consider</u> local views and preserve protected strategic views	For consistency – in response to Q10 in Matter 7 of the Inspector's Matters, Issues and Questions
MM139	MM70	Policy D2 Tall buildings		Propose the following modification to Policy D2 Part C.8 – the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets <u>(including in neighbouring boroughs where impacted)</u> in accordance with Policy D5 (Historic Environment).	To respond to comments made by LB Islington (Responder ID 606)
MM140		Policy D2 Tall buildings	12.31	Propose the following modification to paragraph 12.31 –	To respond to action 27 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				A list of the sites shown on Figure 22 is set out in Table 12 above. The locations shown on Figure 22 and listed in Table 12 have been informed by the Camden Building Heights Study. Guidance on building heights for specific sites is set out in relevant site allocation policies. <u>Applications for tall buildings at locations not identified on Figure 22 or listed in Table 12 will also be considered against Policy D2 and other relevant policies.</u>	
MM141	MM72	Policy D6 Basements		Propose the following modification to Policy D6 Part A.1 – neighbouring properties <u>and infrastructure.</u>	For clarity – to respond to comments from TfL (responder ID 604)
MM142		Policy D6 Basements		Propose the following modifications to Policy D6 Part C – 3. Not exceed the footprint of the host building in area, except for works to create a lightwell or access to the basement <u>50% of each garden within the property;</u> 4. be set back from neighbouring property boundaries where a new access or lightwell is being created; and <u>4. be less than 1.5 times the footprint of the host building in area;</u> <u>5. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;</u> <u>6. not extend into or underneath the garden further than 50% of the depth of the garden;</u>	To respond to action 30 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				7. 5. avoid the loss of garden space or trees of townscape or amenity value from construction work or due to the creation of a new access or lightwell.	
MM143		Policy D6 Basements		Propose the following modifications to Policy D6 Part D – Exemptions to C(1) to C(5 7) above may be made on large comprehensively planned sites.	To respond to action 30 in ED89 Actions and Modifications Table
MM144		Policy D6 Basements		Propose the following modifications to Policy D6 Part E – 8. Ensure impacts on any green/garden space or trees are minimised and where residual impacts do arise this is addressed through appropriate restoration and replacement, <u>in accordance with Policy NE2 (Biodiversity) prioritising biodiversity enhancements where possible.</u> <u>9. take opportunities to increase natural soft landscaping and tree planting through a landscaping or planting plan, with biodiversity measures incorporated to improve the character, amenity and function of the garden.</u>	To respond to action 30 in ED89 Actions and Modifications Table
MM145		Policy D6 Basements	12.131	Propose the following modification to paragraph 12.131 – In addition to protecting against flooding, ground instability and damage to neighbouring buildings as set	To respond to action 30 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				out above, the Council will seek to control the overall size of basement development to protect the character and amenity of the area, the quality of gardens and vegetation and to minimise the impacts of construction on neighbouring properties. Basement rooms should not extend beyond the footprint of the original building and be no deeper than one full storey below ground level. Basements should not comprise more than one storey. The Council considers a single storey for a basement to be approximately 3 to 4 metres in height. We will allow a proportion of the basement to be deeper to allow development of swimming pools.	
MM146		Policy D6 Basements	New paragraph to follow Para 12.131 (new 12.132)	Propose to insert the following new paragraph after 12.131 - <u>12.132 Criterion C(3) states that basements should not exceed 50% of each garden within the property. This criterion applies to the front garden, the rear garden and gardens to the side of the property individually, rather than calculated as an aggregated garden area for the whole property. This criterion applies to gardens as they currently exist and not the gardens of the proposed development. The unaffected garden must be in a single area and where relevant should form a continuous area with other neighbouring gardens.</u> Renumber subsequent paragraphs.	To respond to action 30 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM147		Policy D6 Basements	New paragraph to follow Para 12.132 above (new 12.133)	Propose to insert the following new paragraph after new paragraph 12.132 proposed in MM146 above - <u>12.133 Applicants should have regard to the overall strategic approach to the natural environment and biodiversity in Chapter 11 of the Local Plan. In particular, developers should realise benefits for biodiversity through increasing soft natural landscaping and planting of high biodiversity value. The Council will use planning conditions to secure landscaping and planting plans to ensure proposals respond positively and sensitively to local context and character, address opportunities to increase local biodiversity and achieve design excellence. Adopted Neighbourhood Plans in the borough set out measures for facilitating a more resilient natural environment, such as strengthened wildlife corridors, which should be given due regard. A baseline ecological assessment (Biodiversity survey and report) may also be required in line with Policy NE2 to ensure that any adverse impacts on biodiversity are avoided or mitigated, and establish how the natural value of the site can be improved against the baseline condition.</u> Renummer subsequent paragraphs.	To respond to action 30 in ED89 Actions and Modifications Table
MM148		Policy D6 Basements	12.132	Propose the following modification to existing paragraph 12.132 –	To respond to action 30 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				Works involving the creation of lightwells or access to a basement should be modest in scale and must be designed to minimise impacts on existing garden space and trees as set out in paragraph 12.139 below. Sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees.	
MM149		Policy D6 Basements	12.139	Propose the following modification to paragraph 12.139 – As set out above, the Council will seek to limit the impact of basement construction in the borough. This will include seeking to safeguard green areas, including gardens, and retaining and protecting trees. <u>Camden has a sizeable number of large residential properties where basement construction can have a significant impact on the biodiversity of a garden and its ground conditions. Where the excavation of a garden would lead to the loss of established planting, it is important that this is mitigated. Large gardens are considered to be especially important for urban biodiversity as they have the ability to support a greater variety of planting, including larger tree and shrub species, and can make a positive contribution to an area's verdant character. They also have particular scope for establishing areas of natural planting, to provide habitat for wildlife and sustain populations of invertebrates.</u> Cumulatively, gardens can have a significant role in providing	To respond to action 30 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				infiltration during rainfall events and contribute towards climate change mitigation. [Start new paragraph] <u>12.x The Council expects B</u>basement development should to be planned to minimise disturbance to gardens, <u>biodiversity and</u> or trees, including root systems, in accordance with Policies NE2 (Biodiversity) and NE3 (Tree Protection and Planting). This includes trees located in the street. Large canopy trees are of particular importance. Further information on protection of trees is available in Camden Planning Guidance on Trees and developers will be expected to have due regard to this. Where re-instatement / restoration of a garden is necessary, we will seek improvements in its biodiversity value and expect the provision of soft landscaping. Applicants should prepare an ecological assessment to deliver biodiversity enhancement measures within the garden, proportionate to the size of scheme. Where the existing biodiversity value is identified as low, developers should seek to deliver net gains in site biodiversity through measures such as native wild planting and additional semi-mature trees. This approach is also likely to realise wider beneficial outcomes, such as improved management of surface run-off. Renumber subsequent paragraphs.	

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
MM150		Policy D6 Basements	12.143 and 12.144	Propose to add the following text to the end of paragraph 12.143 “<u>Excessively large lightwells will be resisted.</u>” and delete paragraph 12.144 – Lightwells to the side or rear of a property should be set away from the boundary of a neighbouring property. Renumber subsequent paragraphs.	To respond to action 30 in ED89 Actions and Modifications Table
MM151		Policy A1 Protecting Amenity	13.30	Propose the following modification to paragraph 13.30 – The Council will expect proposals for the redevelopment of sites that are known to be contaminated, have the potential to be contaminated, or are located in close proximity to such sites, to submit relevant <u>and robust</u> assessments and take appropriate remedial action to the Council's satisfaction if required.	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'
MM152	MM74	Policy A3 Air quality	13.67	Propose to insert the following text at the end of paragraph 13.67 – <u>If the AQA includes an assessment of laboratory flues, or consideration of other emissions which need specialist consideration, then the Council will seek independent verification of the assessment, to be paid for by the developer.</u>	For clarity
MM153	MM84	Policy T1 Safe, healthy and sustainable transport		Propose the following modification to Policy T1 Part A (6) -	To respond to action 95 in ED89 Actions and Modifications Table

New Reference	Former Reference (SD50/51)	Policy	Paragraph	Proposed Modification	Reason for Modification
				not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure projects, <u>including, but not limited to, High Speed 2 and Crossrail 2.</u>	
MM154		Policy T2 Prioritising walking, wheeling, and cycling		Propose the following modification to Policy T2 Part C (2) – require development to provide for high quality, accessible, inclusive, convenient, and safe cycle parking facilities, <u>in line with or</u> exceeding the minimum standards outlined in the London Plan, and design requirements outlined within Camden Planning Guidance on Transport. Higher levels of provision will be <u>encouraged expected</u> in areas well served by cycle route infrastructure, taking into account the size and location of the development;	To respond to action 96 in ED89 Actions and Modifications Table
MM155		Policy T6 Sustainable movement of goods, services, and materials		Propose the following modification to Policy T6 Part C – Where the impact from a development cannot be mitigated <u>to the Council's satisfaction</u> , then the Council will expect the development to contribute towards off-site freight/servicing provision (for example, last-mile delivery hubs or cycle freight systems) and other measures, as appropriate.	To respond to the action in the Inspector's Post Hearings Letter ED90 to replace the wording 'to the Council's satisfaction'