Camden Local Plan

Proposed Submission Draft

April 2025

Camden

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Contents

Chapter 01 – Introduction 1

Introduction 2

The challenges we face 14

Vision and objectives 20

Chapter 02 – Development Strategy 25

The need for new homes and jobs 28

Spatial strategy 30

Policy DS1 – Delivering healthy and sustainable development 34

Chapter 03 – South Camden 39

Policy S1 – South Camden 40

Policy S2 – Euston Area 48

Policy S3 – Hatton Garden Jewellery Industry Area 52

Policy S4 – Bloomsbury Campus Area 56

Site Allocation Policy S5 – 120-136 Camley Street 62

Site Allocation Policy S6 – 104-114 Camley Street and Cedar Way Industrial Estate 65

Site Allocation Policy S7 – 24-86 Royal College Street (Parcelforce and ATS Tyre Site) 68

Site Allocation Policy S8 – St. Pancras Hospital 71

Site Allocation Policy S9 – Shorebase Access 74

Site Allocation Policy S10 – Bangor Wharf and Eagle Wharf 76

Site Allocation Policy S11 – Former Royal National Throat, Nose and Ear Hospital 78

Site Allocation Policy S12 – Belgrove House 80

Site Allocation Policy S13 – Former Thameslink Station, Pentonville Road 82

Site Allocation Policy S14 – Land at Pakenham Street and Wren Street 84

Site Allocation Policy S15 – Land to the rear of the British Library 86

Site Allocation Policy S16 – Former Central St Martins College 88

Site Allocation Policy S17 - Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street 90

Site Allocation Policy S18 – 135-149 Shaftesbury Avenue 93

Site Allocation Policy S19 – Cockpit Yard and Holborn Library 95

Site Allocation Policy S20 – York Way Depot and adjacent land at Freight Lane 97

Site Allocation Policy S21 – Agar Grove Estate 100

Site Allocation Policy S22 – 6 St Pancras Way 100

Site Allocation Policy S23 – Tybalds Estate 100

Site Allocation Policy S24 – 294-295 High Holborn 100

Site Allocation Policy S25 – 156-164 Gray's Inn Road 100

Contents

Site Allocation Policy S26 – 8 - 10 Southampton Row 100
Site Allocation Policy S27 – Middlesex Hospital Annex, 44 Cleveland Street 100
Site Allocation Policy S28 – Central Somers Town 100
Site Allocation Policy S29 – Chalton Street, Godwin and Crowndale Estate 100
Site Allocation Policy S30 – Birkbeck College, Malet Street 100
Site Allocation Policy S31 – Senate House (NW quadrant), Malet Street 100
Site Allocation Policy S32 – 20 Russell Square 100

Chapter 04 – Central Camden 101
Policy C1 – Central Camden 102
Site Allocation Policy C2 – Regis Road and Holmes Road Depot 112
Site Allocation Policy C3 – Murphy Site 117
Site Allocation Policy C4 – Kentish Town Police Station 121
Site Allocation Policy C5 – 369-377 Kentish Town Road 123
Site Allocation Policy C6 – Kentish Town Fire Station 125
Site Allocation Policy C7 – Morrisons Supermarket 127
Site Allocation Policy C8 – Former Morrisons Petrol Filling Station 131
Site Allocation Policy C9 – 100 Chalk Farm Road 134
Site Allocation Policy C10 – Juniper Crescent 137
Site Allocation Policy C11 – Network Rail land at Juniper Crescent 140
Site Allocation Policy C12 – Gilbeys Yard 143
Site Allocation Policy C13 – West Kentish Town Estate 147
Site Allocation Policy C14 – Hawkridge House 150
Site Allocation Policy C15 – Wendling Estate and St Stephens Close 152
Site Allocation Policy C16 – Shirley House 155
Site Allocation Policy C17 – Camden Town over station development 157
Site Allocation Policy C18 – UCL Campus,109 Camden Road 161
Site Allocation Policy C19 – Arlington Road former depot site 163
Site Allocation Policy C20 – Highgate Centre, Highgate Road 165
Site Allocation Policy C21 – Grand Union House, 18-20 Kentish Town Road 165
Site Allocation Policy C22 – Heybridge Garages, Hadley Street 165
Site Allocation Policy C23 – Former flats 121 – 129 Bacton, Haverstock Road 166
Site Allocation Policy C24 – 52 - 54 Avenue Road 166
Site Allocation Policy C25 – 5-17 Haverstock Hill (Eton Garage) 166
Site Allocation Policy C26 – 160 Malden Road 166
Site Allocation Policy C27 – Land adjacent to Constable House, Adelaide Rd 166

Contents

Chapter 05 – West Camden 167

Policy W1 – West Camden 168
Site Allocation Policy W2 – O2 Centre, carpark and car showroom sites and 14 Blackburn Road 176
Site Allocation Policy W3 – 11 Blackburn Road 179
Site Allocation Policy W4 – 13 Blackburn Road 181
Site Allocation Policy W5 – 188-190 Iverson Road 183
Site Allocation Policy W6 – Land to the rear of Meridian House, 202 – 204 Finchley Road 185
Site Allocation Policy W7 – Gondar Gardens Reservoir 187
Site Allocation Policy W8 – 88-92 Kilburn High Road 190
Site Allocation Policy W9 – Land at Midland Crescent, Finchley Road 192
Site Allocation Policy W10 – 104A Finchley Road 192
Site Allocation Policy W11 – Abbey Co-Op Housing Site, Emminster and Hinstock 192
Site Allocation Policy W12 – 100 Avenue Road 192
Site Allocation Policy W13 – 551-557 Finchley Road 192
Site Allocation Policy W14 – 317 Finchley Road 192

Chapter 06 – North Camden 193

Policy N1 – North Camden 194
Site Allocation Policy N2 – Mansfield Bowling Club 201
Site Allocation Policy N3 – Queen Marys House 203
Site Allocation Policy N4 – Hampstead Delivery Office 205

Chapter 07 – Meeting Housing Needs 207

Policy H1 – Maximising housing supply 208
Policy H2 – Maximising the supply of self-contained housing from mixed use schemes 215
Policy H3 – Protecting existing homes 225
Policy H4 – Maximising the supply of affordable housing 229
Policy H5 – Protecting and improving affordable housing 244
Policy H6 – Housing choice and mix 248
Policy H7 – Large and small homes 257
Policy H8 – Housing for older people, homeless people and other people with care or support requirements 264
Policy H9 – Purpose built student accommodation 275
Policy H10 – Housing with shared facilities 285
Policy H11 – Accommodation for travellers 294

Contents

Chapter 08 – Responding to the Climate Emergency 297

Policy CC1 – Responding to the climate emergency 298
Policy CC2 – Prioritising the retention of existing buildings 301
Policy CC3 – Circular economy and reduction of waste 305
Policy CC4 – Minimising carbon emissions 310
Policy CC5 – Sustainability improvements to existing buildings 313
Policy CC6 – Energy use and the generation of renewable energy 317
Policy CC7 – Heat networks 324
Policy CC8 – Overheating and cooling 327
Policy CC9 – Water efficiency 331
Policy CC10 – Flood risk 334
Policy CC11 – Sustainable drainage 339

Chapter 09 – Delivering an Inclusive Economy 343

Policy IE1 – Growing a successful and inclusive economy 344
Policy IE2 – Offices 350
Policy IE3 – Industry 354
Policy IE4 – Affordable workspace 358
Policy IE5 – Hotels and visitor accommodation 363
Policy IE6 – Supporting designated centres and essential services 367
Policy IE7 – Hot food takeaways 377
Policy IE8 – Gambling uses 380
Policy IE9 – Delivery-led food businesses 383
Policy IE10 – Markets 386

Chapter 10 – Supporting Camden's Communities 389

Policy SC1 – Improving health and wellbeing 390
Policy SC2 – Access for all 395
Policy SC3 – Social and community infrastructure 399
Policy SC4 – Open space 405
Policy SC5 – Food growing 413
Policy SC6 – Cultural facilities 416
Policy SC7 – Public houses 419

Chapter 11 – The Natural Environment 423

Policy NE1 – The natural environment 424
Policy NE2 – Biodiversity 430
Policy NE3 – Tree planting and protection 435
Policy NE4 – Water quality 441

Contents

Chapter 12 – Design and Heritage 445

Policy D1 – Achieving design excellence 446
Policy D2 – Tall buildings 453
Policy D3 – Design of housing 459
Policy D4 – Extensions and alterations to existing buildings 464
Policy D5 – Historic environment 467
Policy D6 – Basements 476
Policy D7 – Advertisements and signage 484
Policy D8 – Shopfronts 488

Chapter 13 – Protecting Amenity 493

Policy A1 – Protecting amenity 494
Policy A2 – Safety and security 500
Policy A3 – Air quality 504
Policy A4 – Noise and vibration 510

Chapter 14 – Safe, Healthy and Sustainable Transport 515

Policy T1 – Safe, healthy and sustainable transport 516
Policy T2 – Prioritising walking, wheeling, and cycling 520
Policy T3 – Public transport 524
Policy T4 – Shared transport infrastructure and services 527
Policy T5 – Parking and car-free development 530
Policy T6 – Sustainable movement of goods, services, and materials 533

Chapter 15 – Delivery and Monitoring 539

Policy DM1 – Delivery and monitoring 540

Appendices 547

Appendix 1 – Local Plan policy replacement schedule 548
Appendix 2 – Access measures 556
Appendix 3 – Defining poor air quality 558
Appendix 4 – Noise thresholds 559

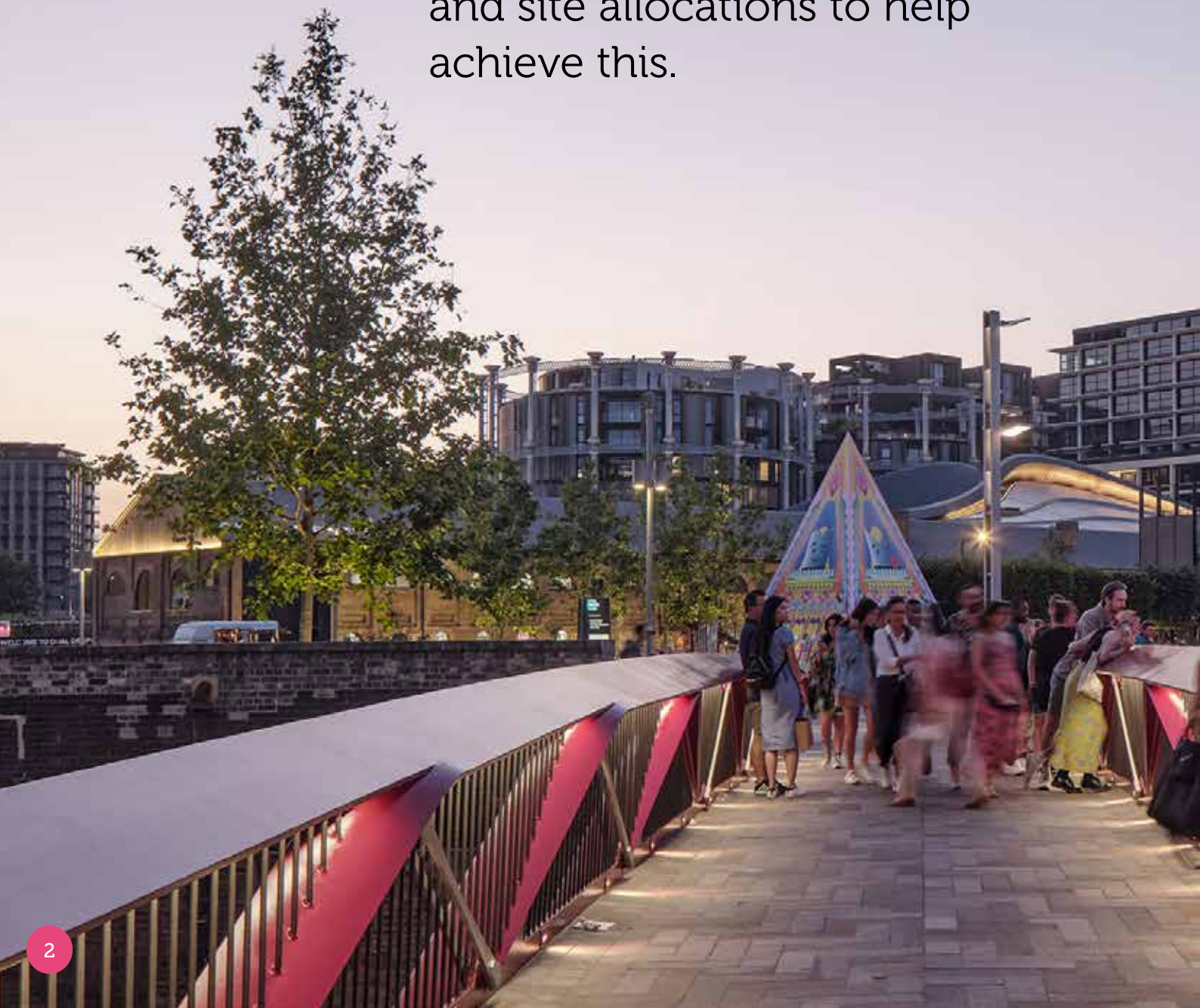
Photography Credits 564

01
Introduction

01
Chapter

Introduction

1.1 The new Camden Local Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this.



1.2 It identifies how many new homes and how much employment floorspace is needed to support Camden's population, and where and how this should be provided. The Local Plan also has an important role in shaping how Camden's places look and feel, promoting inclusion, reducing inequality, enhancing the environment, tackling climate change and securing sustainable neighbourhoods.

1.3 The new Camden Local Plan will ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics. It will contribute to the delivery of the ambitions, missions and challenges identified in We Make Camden, the Council's corporate strategy, and other local priorities set out in plans and strategies prepared by the Council and other bodies.

1.4 The Local Plan will cover the period from 2026 - 2041. Once adopted it will replace the current Camden Local Plan (2017), the site allocations in the Fitzrovia Area Action Plan (2014) and relevant site allocation policies in the Camden Site Allocations Plan (2013). A policy replacement schedule is set out in Appendix 1.

Photograhy: Simon Kennedy

Camden's development plan

1.5 The Local Plan is a key document in Camden's development plan, the name given to the group of documents that set out the Council's planning policies. The Council's decisions on planning applications must be in line with the development plan unless there are significant matters (material considerations) that indicate otherwise.

1.6 Councils must have regard to the National Planning Policy Framework (NPPF) when drawing up their plans and it is a material consideration in decision making on planning applications. The NPPF is supported by more detailed National Planning Practice Guidance.

1.7 The NPPF includes a 'presumption in favour of sustainable development'. It states that for plan making the presumption means that local authorities should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. Plans should be based upon, and reflect, the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The new Local Plan has been prepared in accordance with the NPPF.

Figure 01:

Camden Planning Document Hierarchy

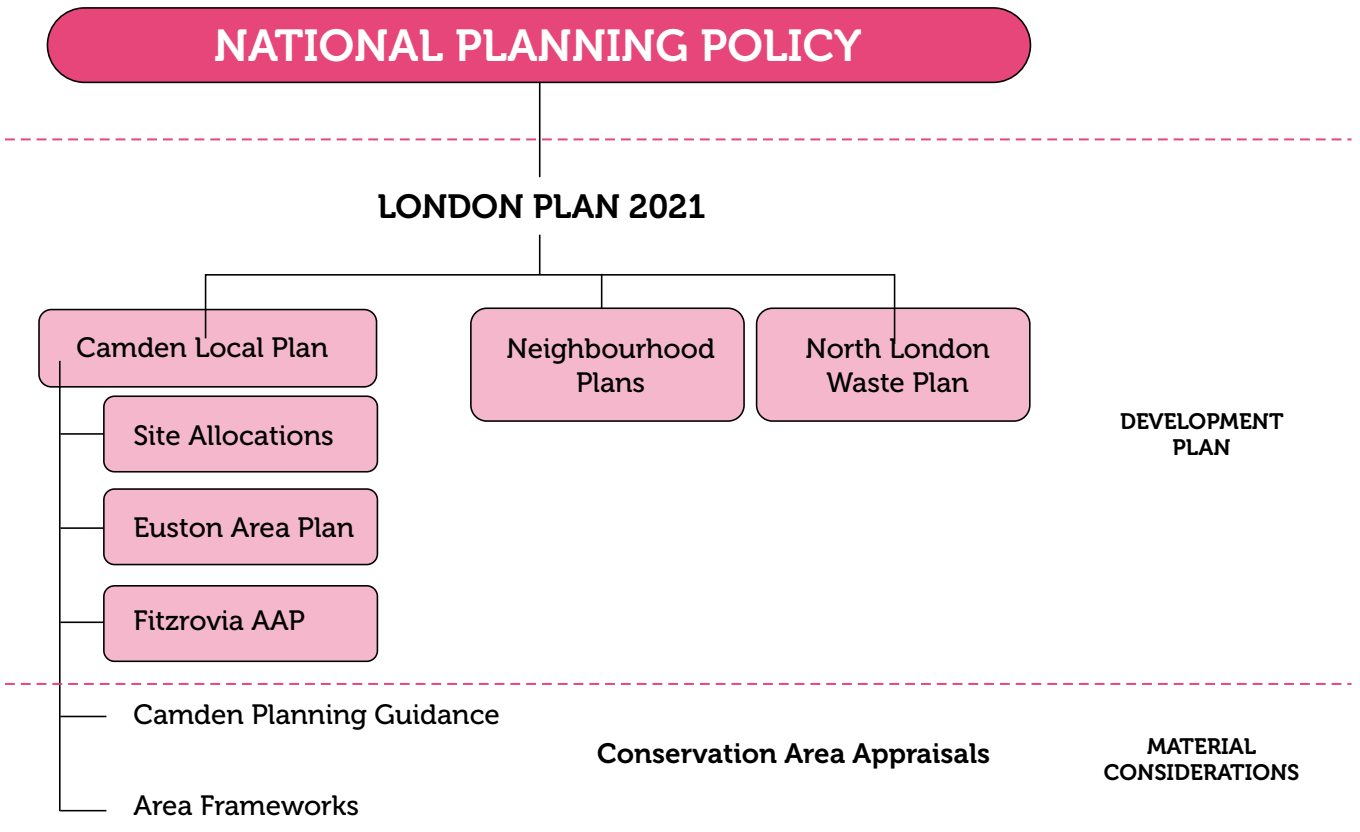
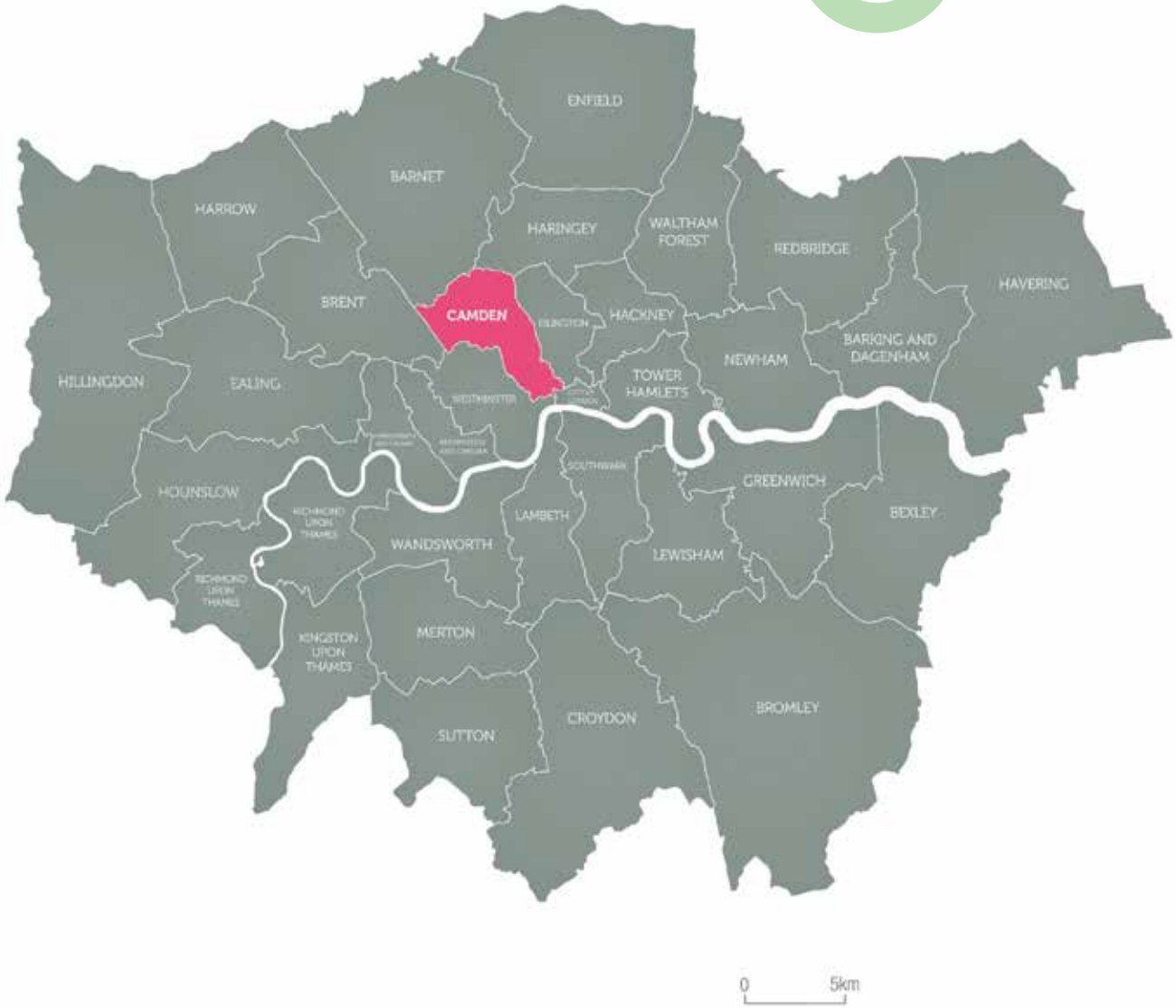


Figure 02:

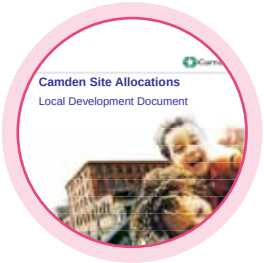
Camden in context



Key

- London Borough of Camden
- London Boroughs

Other documents in Camden's development plan



1.8 **London Plan** - The London Plan is the Mayor's planning strategy for Greater London. It sets borough level housing targets and identifies locations for future growth of London-wide importance. The London Plan forms part of all London boroughs' development plans and Camden's new Local Plan (and other development plan documents) needs to be in general conformity with it.

1.9 **Camden Site Allocations** – this identifies known development sites in Camden's main growth areas, and other locations across the borough, that are suitable for substantial development and sets out the Council's expectations for them. The Camden Site Allocations Plan was adopted by the Council in 2013 and will be replaced by the new Local Plan and the updated Euston Area Plan once they are adopted. A policy replacement schedule is set out in Appendix 1.

1.10 **Fitzrovia Area Action Plan** – was adopted by the Council in 2014 responding to the significant pressure for development in this area and co-ordinates development proposals across a number of significant sites. When it is adopted the new Local Plan will replace the policies and guidance relating to specific opportunity sites within the Fitzrovia Area Action Plan. A policy replacement schedule is set out in Appendix 1.

1.11 **Euston Area Plan** – this is a strategic plan to help shape future change in the area around Euston Station. It seeks to ensure that we can secure the best possible future for the residents and businesses of Euston and visitors to the area. It was prepared jointly by Camden Council, the Greater London Authority and Transport for London and was adopted by the Council in 2015. The Council are updating the Euston Area Plan (EAP) to ensure it has an up-to-date policy framework to guide decisions at Euston. The new EAP sets strategic objectives and guidelines for development in the area, in addition to allocating sites for development to deliver new homes and jobs.

1.12 **Neighbourhood Plans** – neighbourhood plans have been made for Fortune Green and West Hampstead (2015); Kentish Town (2016); Highgate (2017); Hampstead (2018); Dartmouth Park (2020); Camley Street (2021); and Redington Frognal (2021). These plans set out the communities' visions for the designated neighbourhood areas, and include a range of planning policies, which are used alongside the Council's own adopted policies when making planning decisions in the neighbourhood areas.

1.13 **North London Waste Plan** – this sets out the planning framework for waste management in the seven north London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. It was adopted by each of the boroughs in 2022 and identifies a range of suitable sites for the management of all North London's waste up to 2031 and includes policies and guidance for determining planning applications for waste developments.

Neighbourhood plans

1.14 Communities can influence the future of their local areas by preparing a neighbourhood plan that sets out their vision for the area and general planning policies to guide development. Neighbourhood plans are led and written by the community, not the Council. They have to be in line with the overall strategic approach in Camden's adopted plans and with national policy.

1.15 A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. Once approved by referendum, a neighbourhood plan becomes part of the development plan for the borough and is taken into account alongside the Council's other plans when making decisions on planning applications in that area.

1.16 Further information about neighbourhood planning in Camden and adopted neighbourhood plans is available on the Council's website: Neighbourhood planning - Camden Council.

Supplementary planning documents

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 do not have the same weight in decision making as Camden's development plan documents, but they are important supporting documents and material considerations in planning decisions.

Other planning guidance

1.19 The Council has also prepared a series of conservation area appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas, in addition to setting out how we consider they can be preserved or enhanced. These are material considerations in the determination of planning applications for development in conservation areas.

Local Plan policies map

1.20 The Local Plan Policies Map shows where the policies in the Local Plan apply geographically, including key sites for development. The policies map has been updated to reflect the policies in the new Local Plan.

Preparation of the new Local Plan

1.21 The decision was taken in 2022 to review the Camden Local Plan 2017, to ensure the Council continues to have a robust and up-to-date policy position which reflects local priorities.

1.22 To inform the review of the Local Plan the Council held an initial 'call for views' in late 2022 / early 2023 to enable residents, community groups, businesses and other interested parties to share their views on the current Local Plan and priorities for the future.

1.23 Prior to this, the Council had consulted on a draft Site Allocations Local Plan in 2020 and late 2021 / early 2022. However, the decision was subsequently made to incorporate the proposed site allocations into the draft new Local Plan.

1.24 The draft new Camden Local Plan was published for consultation and engagement from the 17 January 2024 to the 13 March 2024.

1.25 Consultation and engagement on the new Local Plan has been undertaken in accordance with the Council's Statement of Community Involvement. The comments received during each stage of consultation and engagement have been considered in preparing and updating the new Local Plan. A summary of the key issues raised through the consultation and the Council's response to them are set out in the Consultation Statement.

1.26 The proposed submission version of the Local Plan is now published for consultation and engagement.

1.27 Following the close of the consultation, the Plan, along with the consultation responses received and supporting evidence, will be submitted to the government for public examination by a Planning Inspector. If the Plan is found sound it will be adopted by the Council for use in planning decisions, superseding the Camden Local Plan 2017 and relevant site allocation policies in the Camden Site Allocations 2013 and Fitzrovia Area Action Plan 2014. A policy replacement schedule is set out in Appendix 1.

Duty to co-operate

1.28 Plans have to be prepared in accordance with the legal 'duty to co-operate'. The duty to co-operate requires local authorities and other public bodies to engage constructively, actively and on an ongoing basis on strategic matters that cross administrative boundaries. The Council has engaged with neighbouring boroughs, and other relevant organisations, in the preparation of the new Local Plan, and will continue to work with them on an on-going basis.

Sustainability appraisal and impact assessment

1.29 The new Local Plan has been subject to a Sustainability Appraisal (incorporating Strategic Environmental Assessment), a Health Impact Assessment and an Equalities Impact Assessment.

1.30 The Sustainability Appraisal assessed the environmental, social and economic impacts of the new Local Plan, including an appraisal of alternative approaches for addressing a range of key Plan issues.

1.31 The Health Impact Assessment assessed the potential health impacts of the Plan and made recommendations to maximise the positive impacts and minimise the negative impacts, to ensure the policy approach in the Plan contributes to improving health outcomes and reducing health inequalities for Camden's communities.

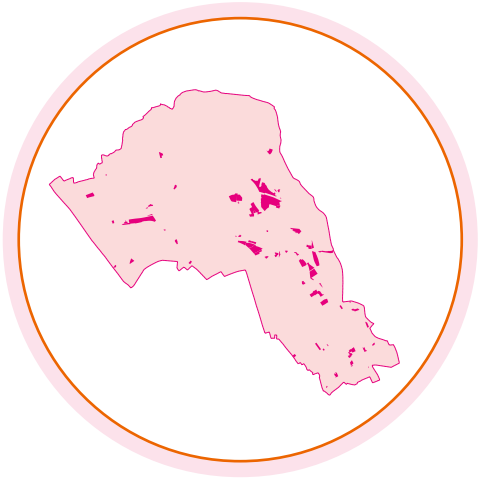
1.32 The Equalities Impact Assessment considered the impact of the Plan on groups that are protected in terms of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It also considered the impact of the Plan on:

- foster carers;
- looked after children/care experienced people;
- low income households;
- refugees and asylum seekers;
- parents (of any gender, with children aged under 18);
- people who are homeless;
- private rental tenants in deprived areas;
- single parent households;
- social housing tenants; and
- gypsies and travellers.

1.33 The Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment are published on the Council's website.

Evidence to support the Local Plan

1.34 The policies in the Local Plan need to reflect up-to-date and relevant evidence about the social, economic and environmental characteristics and prospects of the borough and must meet identified needs in accordance with the National Planning Policy Framework (NPPF). The Council has collected a wide range of information and commissioned studies to support and inform the new Plan, including studies on housing need, employment land, retail floorspace, flood risk, and biodiversity. A viability assessment of the policies in the new Plan has also been undertaken. This evidence can be viewed on the Council's website.



Site allocations

1.35 The new Local Plan includes a number of site allocation policies. The policies set out the Council's preferred approach to the development of the allocated sites to ensure that they deliver the objectives of this Local Plan and meet the needs of the local community.

1.36 Each site allocation policy responds to local and site specific issues and opportunities. However, all the site allocation policies are structured in the same way, setting out: site details; allocated use; indicative capacity; context; development and design principles; infrastructure requirements; and other considerations.

1.37 Sites have been identified and allocated taking into account national policy and guidance, the London Plan and the policies in the Local Plan. No sites in the Euston area are allocated in this Plan as they will be identified through the update to the Euston Area Plan.

1.38 Indicative housing capacities are identified for allocated sites. It is important to note that these are indicative and therefore are not fixed figures that must be adhered to exactly. Indicative housing capacities have been identified based on adopted area frameworks, neighbourhood plan policies, existing planning permissions and design-led site capacity work.

1.39 Where schemes come forward that propose substantial or full demolition of existing buildings on these sites, applicants will need to comply with the requirements set out in Policy CC2 (Retention of Existing Buildings). 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.

1.40 A larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours. A lower number 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.

Strategic and non-strategic policies

1.41 The National Planning Policy Framework (NPPF) states that Local Plans should include strategic and non-strategic policies, and that these should be clearly distinguished.

1.42 Strategic policies should set out an overall strategy for the pattern, scale and quality of development including housing and employment uses. Non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development.

1.43 All the policies in the Local Plan are considered to be strategic policies, with the exception of the following, which are considered to be non-strategic policies:

- Policy IE7 – Hot Food Takeaways;
- Policy IE8 – Gambling Uses;
- Policy SC5 – Food Growing;
- Policy D6 – Basements;
- Policy D7 – Advertisements and Signage;
- Policy D8 – Shopfronts;
- Policy A4 – Noise and Vibration.

1.44 For the avoidance of doubt, all policies in the Local Plan have full statutory development plan weight and the Local Plan should be read as a whole.

The challenges we face

1.45 Camden's planning strategy has been prepared in the context of the social, economic and environmental changes we face as a borough. Some of the key challenges and issues we need to address in our planning policies are outlined below.

Adapting to Camden's changing population

1.46 Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. Camden's population is also ethnically diverse, with the 2021 Census showing that 40.5% of Camden's residents were from Black, Asian or other ethnic communities. Furthermore, the 2021 Census reports that 15.2% of residents in Camden have a disability or long-term condition that limits their day-to-day activities. This is the second highest proportion amongst London boroughs and is higher than the London average (13.2%). A key challenge for the Plan is to therefore ensure that development celebrates and reflects the diversity of Camden's communities and supports the provision of accessible services and facilities to meet their needs.

The supply and cost of housing in the borough

1.47 Many people want to live in Camden but there is a limited supply of homes and prices are high. This is primarily due to the limited availability of land in Camden and competition from other uses, which have high returns on investment.

1.48 It is important to ensure that we help keep Camden's social mix and make sure that the borough does not become polarised between wealthy and less well-off residents. We face the challenge of providing both more homes and a more varied range of housing to meet existing and future housing needs, in particular those of young people and families, who often struggle to find suitable and affordable homes in Camden.

Responding to the climate and ecological emergency

1.49 The Council declared a climate and ecological emergency in 2019, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems. We Make Camden, the Council's corporate strategy, emphasises the need for Camden to adapt to meet the climate challenge that faces us, address the causes of the climate emergency, and work towards becoming net-zero, while ensuring that we are supporting and protecting the most vulnerable members of our communities from the impacts of climate change. This is supported by our biodiversity strategy 'Making space for nature in Camden' which sets out a vision for how we will make Camden a place where nature thrives.

1.50 A key challenge for the Plan is therefore to ensure that development in Camden seeks to mitigate and adapt to climate change and enhance biodiversity by:

- making the best use of sites in the most accessible locations;
- using less energy;
- minimising the use of resources;
- following the principles of a circular economy, where re-use and recycling are prioritised;
- delivering net gains in biodiversity;
- supporting tree planting; and
- ensuring that buildings and spaces are designed to cope with more extreme weather.

Supporting Camden's centres

1.51 Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole. They are places of employment, shopping, leisure, and services and can be important for social, community and cultural exchange, by providing places where people can meet and interact.

1.52 However, traditional retail-based centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out-of-centre retail locations. Our centres are under pressure from a range of issues, for example the cost-of-living crisis and hybrid working are impacting on 'footfall' (how many people use a centre), particularly in the south of the borough. A key challenge we face is therefore supporting our high streets to diversify and adapt over time in terms of managing land uses whilst ensuring that the vitality and role of individual centres is not put at risk.

Creating a sustainable and inclusive economy

1.53 Camden has a very successful and diverse economy, which makes a significant contribution to the UK economy, as well as being a key part of central London, with its concentration of businesses, retail and tourism uses. The Council wants to maintain and strengthen Camden's economic position, maximising opportunities for residents, businesses and the voluntary sector to contribute to and share in the success of Camden's economy through local procurement, business support, education, training and skills.

1.54 Whilst there remains a strong demand for high quality offices in the south of the borough and a growing demand for laboratory and research space. At the same time, there is a need to retain a diverse range of neighbourhood workspace to support a variety of local businesses, including for makers and creative industries.

1.55 Furthermore, employment is the biggest factor affecting income inequality in the borough, so we need to ensure that we help more people to get into work and develop their careers in the long-term. This can be supported through a range of measures, including helping people to access training and establishing links with businesses.

Inequalities

1.56 The success of Camden's economy is not shared by all. The borough has some of the most deprived neighbourhoods in London as well as some of the most prosperous. Inequalities, particularly felt by our often 'easy to ignore' communities, are compounded when taking an intersectional view. Therefore, it is even more crucial that the Local Plan aids achieving equitable outcomes in Camden for all.

Health and well-being

1.57 Camden has one of the largest health inequality gaps in England and people suffering from poor health are generally concentrated in some of the borough's most deprived wards. We know that health is intrinsically linked to early life experience, education, employment, housing, leisure, and the local environment – otherwise known as the social determinants of health. These are the social, cultural, economic and environmental factors that shape the conditions in which we live. Planning can play a pivotal role in influencing key health determinants, addressing inequalities, and improving the physical and mental health, and well-being, of Camden's population.

Improving transport

1.58 Camden benefits from some of the best transport accessibility in the country and this will be enhanced by HS2 and potentially Crossrail 2. It is well served by bus, tube and rail, providing links within London, to other parts of the country, and to mainland Europe. We need to go further, however, to change the way we move about, to ensure that travel becomes healthier, safer, more inclusive (for example by increasing number of step-free stations), more efficient, more sustainable, and more affordable. Achieving this will help to improve air quality, personal health, equality and community cohesion, access to opportunities and services, and economic growth. In addition, it will support the Council's commitment to being a net zero borough by 2030 by reducing transport's contribution to climate change, help to tackle congestion on the transport network, and create more inclusive streets that better meet the needs of Camden's communities.

Quality of the environment

1.59 Good quality, inclusive design is essential in creating and maintaining places where people want to live and work, now and in the future. Good design is not just about making places visually attractive. It has an important role in mitigating the effects of climate change; promoting active travel; delivering high quality, accessible and adaptable accommodation that meets the needs of occupiers; and creating healthy and safe communities. The Council has developed a Diversity in the Public Realm strategy, that seeks to create a borough with places and spaces that are truly representative of the people we have within our communities, and it is important that new development helps to deliver this.

1.60 Camden has many attractive and historic neighbourhoods (such as Hampstead, Highgate, Primrose Hill and Bloomsbury) and numerous parks and open spaces (ranging from local playgrounds to Hampstead Heath). These contribute greatly to the attractiveness and character of the borough. We need to make sure that new development respects, explores and reveals the character, heritage and distinctiveness of Camden's valued and special places.

1.61 Planning also has an important role to play in shaping public spaces to be safe, inclusive, accessible and welcoming for everyone – designing equality, connection, play and community into our streets, estates and neighbourhoods and ensuring that public spaces and new developments reflect the shared history, culture and diversity of Camden to promote a sense of belonging.

Crime and safety

1.62 Camden experiences the crime and disorder common in inner city areas, and antisocial behaviour, crime and drugs are major concerns for local residents. The challenge we face is to make the borough a safer place whilst ensuring it maintains the vibrancy that makes it such an attractive place to live, work and visit.

Vision and objectives

1.63 The Council's vision for the borough is set out in We Make Camden. The vision for the Local Plan is therefore based on the vision of We Make Camden.

1.64 **"We want to make Camden a better borough – a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone"**

1.65 This Local Plan is a key mechanism for delivering the priorities of We Make Camden and other Council strategies including the Climate Change Action Plan, Clean Air Action Plan, Camden Health and Well-being Strategy, Transport Strategy and Biodiversity Action Plan.

1.66 We Make Camden sets out six ambitions for the borough:

6 AMBITIONS

1. Camden is a borough where every child has the best start in life
2. Camden's local economy should be strong, sustainable and inclusive - everyone should have a secure livelihood to support them to live a prosperous life
3. Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute
4. Camden communities support good health, well-being and connection for everyone so that they can start well, live well and age well
5. Everyone in Camden should have a place they call home
6. Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.

1.67 These are supported by four missions and six challenges, which aim to bring to life the Council's ambitions and help make them a reality in every community in Camden.

1.68 The key missions set out in We Make Camden for the Local Plan are:

- **Young people:** Every young person has access to economic opportunity that enables them to be safe and secure;
- **Food:** Everyone eats well every day with nutritious, affordable, sustainable food;
- **Estates and neighbourhoods:** Camden's estates and their neighbourhoods are healthy, sustainable and unlock creativity.

1.69 The key challenges set out in We Make Camden for the Local Plan are:

- **Safety:** Everyone is safe at home and safe in our communities;
- **Digital:** Everyone in Camden can access and be part of a digital society;
- **Loneliness:** No one in Camden is socially isolated without the means to connect to their community;
- **Housing:** Camden has enough decent, safe, warm, and family-friendly housing to support our communities;
- **Climate emergency:** Camden's local economy tackles the climate emergency.

Strategic objectives

1.70 We have developed a series of objectives for the Local Plan to help deliver the vision and ambitions of We Make Camden.

1.71 The strategic objectives of the Plan are set out below, alongside the six ambitions of We Make Camden (see above) and the relevant policies in this Local Plan, to show how they will contribute to and work together to achieve the objectives.

Table 1 | Strategic Objectives

Strategic Objectives	We Make Camden Ambition	Local Plan Policy
To ensure that development in Camden responds to the climate emergency by delivering zero carbon development, reducing energy use in existing buildings, optimising resource efficiency, achieving the highest possible environmental standards, and requiring buildings and spaces to be designed and constructed to adapt to, and reduce, the effects of climate change.	6	DS1, CC1, CC2, CC3, CC4, CC5, CC6, CC7, CC8, CC9, CC10, CC11, D1, D2, D3, D4, D5, NE1, NE2
To increase the supply of homes to meet existing and future needs, with an emphasis on the provision of genuinely affordable homes. Self-contained housing is the priority use of the Local Plan.	1, 5	DS1, H1, H2, H4, H5, H6, H7, H8, H9, H10, H11
To make sure that development meets the needs of Camden's diverse communities and enables safe, strong, inclusive, cohesive, open, resilient and multi- generational communities, to help reduce inequality and isolation in the borough, and support the provision of accessible facilities and services to meet community needs.	1, 3, 4	DS1, H6, H8, D1, SC1, SC2, SC3, SC5, SC6, CC1, A2, T1, T2, T3, T4, IE1, IE6, DM1
To strengthen Camden's nationally important economy and maximise opportunities for Camden's residents, businesses and voluntary sector to contribute to, and share in, the success of Camden's economy, through local procurement, business support, education, training and skills.	2	DS1, IE1, IE2, IE3, IE4, IE5, IE6
To ensure our designated centres are accessible and sustainable, to enhance their unique character and support their varied roles as centres of trade, community activity, creativity, business, tourism and learning.	2	DS1, IE1, IE5, IE6, SC3, SC6, D1, D7, D8, T1, T2, T3, T4
To promote high quality, inclusive and sustainably designed development which protects resident's amenity, respects and conserves the unique character and history of Camden's neighbourhoods, celebrates and reflects the diversity of Camden's communities, and enables families to remain in the borough and thrive.	1, 3, 4, 6	DS1, CC1, D1, D2, D3, D4, D5, A1, A2, H1, H6
To promote active and sustainable transport, where walking, wheeling and cycling are the safest and most convenient options; invest in public transport; and reduce reliance on private cars, to reduce air pollution and improve health and well-being.	3, 4, 6	DS1, T1, T2, T3, T4, T5, A3, CC1, SC1, D1
To improve access to parks and green spaces and enhance biodiversity, by protecting and enhancing existing assets and providing new green spaces and habitats.	6	NE1, NE2, NE3, SC4, SC5, DS1, D1
To promote health and well-being and reduce physical and mental health inequalities through good design and place making; improving access to nature; enabling affordable healthy food choices; supporting people to lead healthy and active lifestyles; and improving access to healthcare and sports facilities.	4, 6	SC1, DS1, H6, H8, D1, D2, D3, SC2, SC3, SC4, SC5, SC6, NE1, NE2, T1, T2, T3, T4, A1, A2, A3, A4

02
Development Strategy

02
Chapter

Development Strategy

2.1 The Local Plan sets out the overarching development strategy for Camden over the period to 2041.

2.2 The development strategy aims to address the long-term needs of the borough and respond to the challenges it faces.

2.3 It maximises opportunities for providing new and affordable homes, jobs, and the infrastructure required to support this, whilst seeking to ensure that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents.

2.4 It provides the strategic framework and context within which the rest of the Plan has been developed.

Photograhy: Simon Kennedy

The need for new homes and jobs

2.5 It is important that the Plan seeks to deliver a sufficient supply of new and affordable homes, and jobs in Camden to meet the needs of our communities both now and in the future.

New homes

2.6 The London Plan sets a housing target for Camden of 10,380 additional homes from 2018/19 to 2028/29, which equates to a need to deliver a minimum of 1,038 homes per year. This includes 3,280 homes from small sites.

2.7 The Local Plan is required by the National Planning Policy Framework to look forward over a 15 year period from the date of adoption. This Plan will therefore cover the period to 2041. As the Plan period extends beyond that for which housing targets are set in the London Plan, a housing requirement has been set for the whole Plan period having regard to the approach set out in the London Plan.

2.8 The Local Plan seeks to maximise housing supply in Camden based on the delivery of available sites and aims to deliver a minimum of 11,550 additional homes over the plan period to 2041. This factors in the London Plan housing target for Camden of 1,038 homes per year for the first three years of the Plan period (2026/27, 2027/28 and 2028/29), and also includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period). It should however be noted that the imminent review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the target that is in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2027/28, so this may mean that Camden's new Local Plan housing target is only in place for a short period of time.

2.9 The housing target in the Local Plan is a capacity-based figure, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in an allowance for unallocated small sites delivering under 10 additional homes (based on evidence of past delivery). It also reflects the uncertainty and delay in development at Euston. In calculating the housing requirement for the Plan period, we have taken into account the housing capacity figures for large sites as set out in the Greater London Authority's Strategic Housing Land Availability Assessment 2017, together with the small sites target of 328 new homes per year set by the London Plan. Further information on the Council's approach to setting the Local Plan housing target is set out in Policy H1 (Maximising Housing Supply).

2.10 The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable. The Council will 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, and achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. Further information on the Council's approach to affordable housing delivery is set out in Policy H4 (Maximising the Supply of Affordable Housing).

2.11 The Council proposes to meet its housing requirement through existing permissions for committed schemes, site allocations and windfall development (proposals that come forward on sites that have not been allocated for development). To this end, the Plan makes a number of site allocations to deliver the additional houses required over the Plan period and these are set out in the area chapters for South, Central, West and North Camden. Site allocations are also identified in the Euston Area Plan to deliver development at Euston and these sites will also contribute to the boroughwide housing target.

2.12 Further details of the Council's strategy for maximising housing supply to meet identified need and the rationale for this is set out in Policy H1 (Maximising Housing Supply).

Jobs

2.13 The Council's Economic Needs Assessment 2023 forecasts a demand for an estimated 406,359 sqm of net additional office floorspace (use classes E(g)(i) and E(g)(ii)) to 2041. This takes account of future labour projections and has allowed for changes in working practices.

2.14 The Council proposes to meet this need from:

- **Existing planning permissions** - the Economic Needs Assessment has identified that existing approvals of major schemes total approximately 211,000 sqm (net internal area) of office floorspace, of which the vast majority of schemes are under construction or expected to be delivered in the first five years of the Plan period;
- **Site allocations** – suitable sites have been allocated for development to deliver new employment floorspace in the borough;
- **Windfall development** – this is expected to deliver increases in employment floorspace on sites that are not allocated or do not have planning permission, both in the Central Activities Zone and in other centres commensurate with their individual size and role.

2.15 Further details of the Council's strategy for delivering a sustainable and inclusive economy is set out in Chapter 9 Delivering an Inclusive Economy.

Spatial strategy

2.16 The Council's overarching spatial strategy is illustrated on the Key Diagram on page 31. This shows key areas of development and Council-led regeneration schemes, together with town centres, the Central Activities Zone (CAZ) boundary, CAZ retail clusters, the borough's industry area, key stations and main open spaces.

2.17 Development is planned to take place across Camden, with the key areas of growth expected to be around:

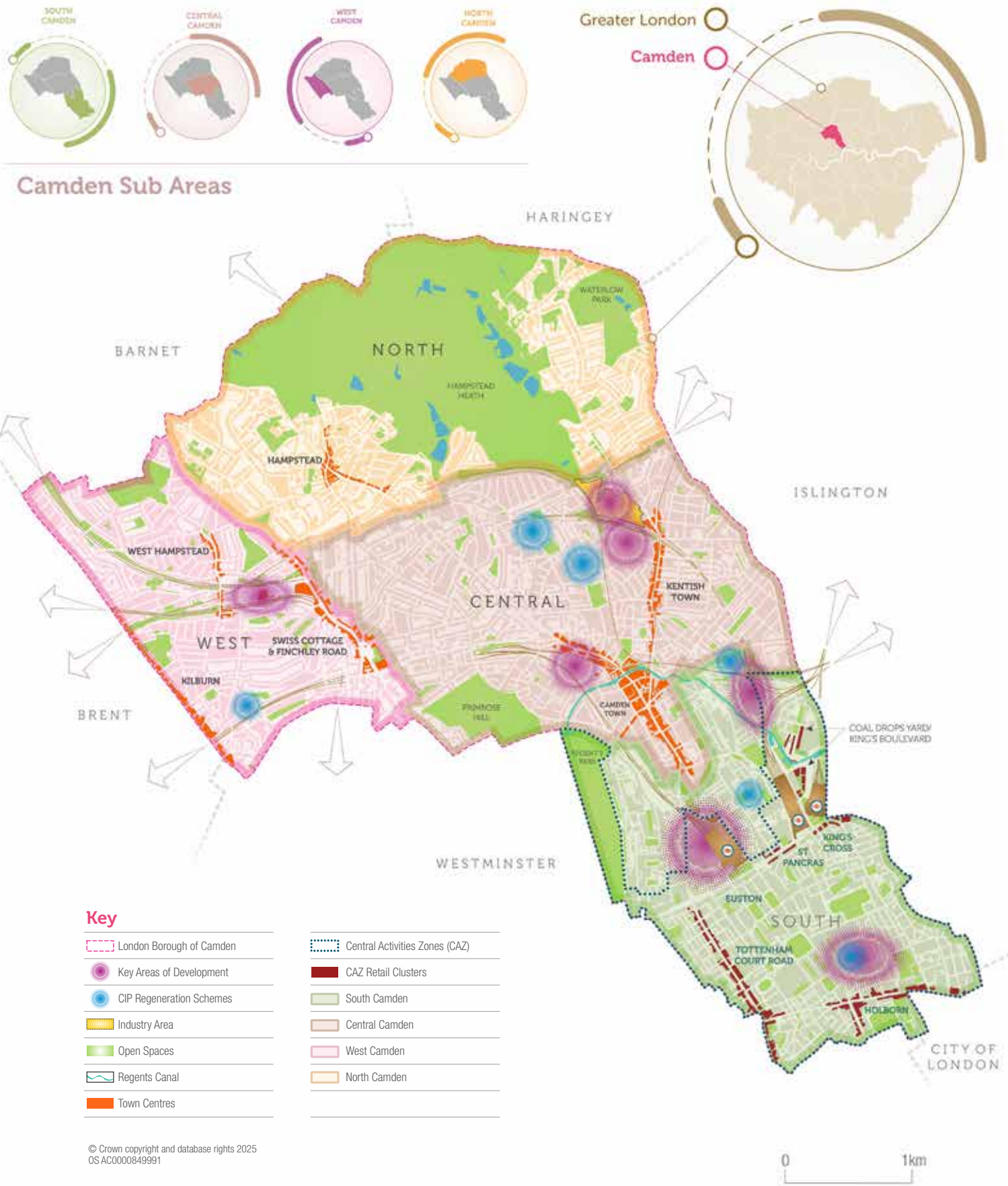
- Euston;
- Camley Street and St Pancras Way;
- Holborn;
- Regis Road and the Murphy site in Kentish Town;
- Camden Goods Yard in Camden Town;
- The O2 site in West Hampstead.

2.18 Further development is also planned as part of the Council's Community Investment Programme, with regeneration schemes being taken forward on the following housing estates:

- West Kentish Town;
- Wendling and St Stephens Close;
- Tybalds;
- Central Sommers Town;
- Agar Grove;
- Abbey Road Community Housing Site.

Figure 03:

Key Diagram



Key

- London Borough of Camden
- Key Areas of Development
- CIP Regeneration Schemes
- Industry Area
- Open Spaces
- Regents Canal
- Town Centres
- Central Activities Zones (CAZ)
- CAZ Retail Clusters
- South Camden
- Central Camden
- West Camden
- North Camden

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2.19 Development will also take place outside of these identified areas, although not at the same scale.

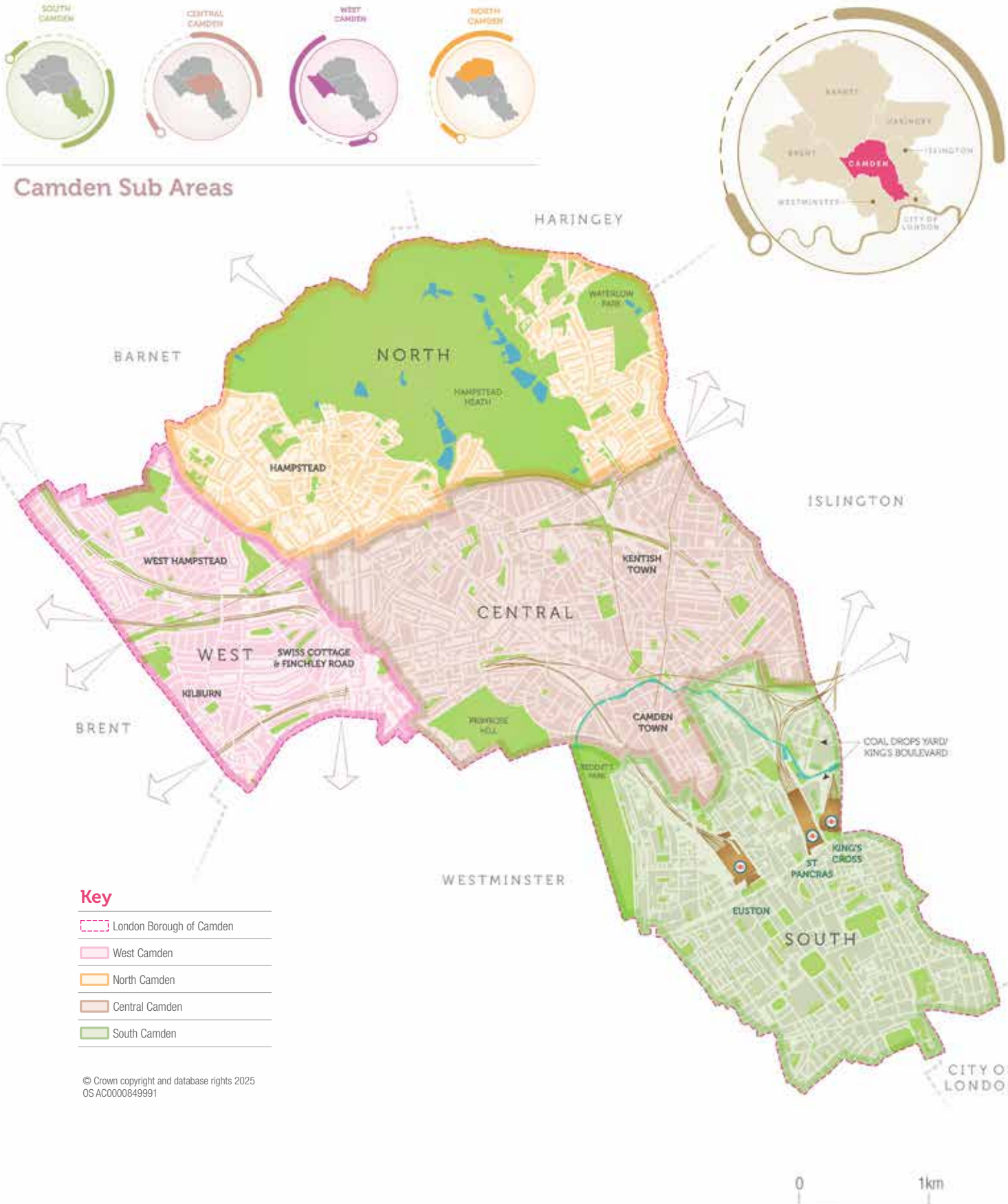
2.20 This Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden, as shown on the map below and on the Key Diagram on page 31.

2.21 The Council's strategy for the sub-areas of South Camden, Central Camden, West Camden and North Camden are set out in Chapters 3, 4, 5 and 6 of the Plan.

2.22 The strategies for the sub-areas set out the Council's approach to the delivery and location of new homes, jobs, retail, leisure uses and infrastructure in each of these areas, in line with the Plan's vision and objectives. Within each area, site allocations have also been identified, in accordance with the Council's development strategy, to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities, together with necessary infrastructure. Sites have been selected for allocation in line with the guidance set out in the National Planning Policy Framework and associated National Planning Policy Guidance.

Figure 04:

Local Plan Areas



Delivering healthy and sustainable development

2.23 A key priority of the development strategy is to ensure that development in Camden makes a positive contribution to the borough to deliver the vision and objectives of the Local Plan; the ambitions, missions and challenges of We Make Camden; and the Good Life Camden framework – a tool that has been developed to help the Council understand what matters to people in Camden and assist us in measuring our impact on this.

2.24 Policy DS1 seeks to ensure that all development in the borough contributes to Good Growth', which is socially and economically inclusive and environmentally sustainable, in order to maximise community benefit, respond to the climate and ecological emergency, create stronger communities and deliver healthy places, both for existing communities and future generations.

Policy DS1

Delivering Healthy and Sustainable Development

A. The Council will expect development to support the creation of healthy and sustainable places in Camden by:

1. ensuring that new buildings and public spaces are of the highest design quality; respect and respond to local context; are inspired by the character of Camden's neighbourhoods and communities; and are inclusive, accessible, safe and welcoming, to meet the needs of Camden's diverse population;
2. delivering buildings that achieve net zero carbon emissions, optimise resource efficiency and are designed to be resilient to climate change;
3. ensuring that developments optimise the use of land and make best use of a site. The Council will resist development that makes inefficient use of Camden's limited land;
4. meeting the needs for new homes and jobs;
5. providing a mix of uses, services, facilities and amenities that meet the needs of the local community and are easily accessible on foot, by bike and via public transport;
6. ensuring that the necessary infrastructure is provided in a timely way to support Camden's communities;
7. protecting amenity, improving air quality and incorporating measures to reduce flood risk;
8. providing new open space, and opportunities for play, recreation and sports;
9. maximising opportunities for enhancing biodiversity, improving access to nature, tree provision, urban hedgerows and community food growing;
10. improving strategic and local transport connections and increasing active travel; and
11. ensuring that a comprehensive approach is taken to site design and layout, including adjacent sites, where these are suitable for re-development, and that a co-ordinated approach is taken to the delivery of development. The Council will resist schemes that prejudice future development potential and/or design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure.

B. To monitor the impact of development on Camden's communities the Council will seek contributions from major developments towards the Council's Citizen Scientist community research programme. Contributions will be secured using Section 106 agreements.

Creating healthy and sustainable places

2.25 Where we live has a profound impact on our health and well-being, it is therefore important that new development prioritises improving the built, natural and social environment in Camden, to create places that promote good health and well-being; are safe, welcoming, accessible and inclusive; encourage social interaction and promote a sense of belonging; and support healthy and active lifestyles, to meet the needs of Camden's communities. Linked to this is the need to ensure that development responds to the climate and ecological emergency, to ensure we are creating sustainable places that achieve net zero carbon emissions, optimise resource efficiency and are designed to be climate resilient, to safeguard our environment for future generations.

2.26 Development proposals coming forward in Camden should therefore be designed in accordance with Policy DS1 (Delivering Healthy and Sustainable Places), having regard to other policies in the Plan.

Design

2.27 Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which respects and responds to its surroundings.

2.28 Character is about people and communities as well as the physical components. How places have evolved historically and the functions they support are key to understanding character. It is important to understand how places are perceived, experienced and valued by all sections of the community. People may value places for different reasons, often reflecting the services or benefits they provide for them. In addition, memory and association are also a component of how people understand a place. All of these values and experiences are part of understanding the character of a place.

2.29 The Council is committed to ensuring that Camden can be enjoyed by all and will promote inclusive design and seek remove the barriers that prevent people from accessing facilities and opportunities when determining planning applications for new developments.

2.30 Planning applications will be expected to include a Design and Access Statement which assesses how the development has been informed by and responds to local context and character. This should also show how the developer has thought carefully about how everyone, in particular d/Deaf, disabled and neurodiverse people, older people, women and gender diverse people, and children, will be able to use the spaces and places created. Further information on Design and Access Statements is set out in the supporting text to Policy D1 (Achieving Design Excellence).

2.31 When designing developments, applicants should have regard to the other policies in this Plan, which provide further detailed guidance on a number of different topics including sustainability, housing, design, access, the natural environment, communities and transport.

Mixed use developments

2.32 Developments will be expected to use land efficiently and make the best use of a site. The provision of an appropriate mix of uses, both within areas and in individual buildings, can contribute to successfully promoting future growth in Camden and making efficient use of its limited land. A mix of uses can:

- increase the provision of much-needed housing;
- promote successful places that have a range of activities and are used throughout the day, increasing safety and security;
- reduce the need to travel by locating a range of uses together and so reduce the need for some journeys, helping to cut congestion in the borough and improve air quality; and
- ensure that communities are supported by a range of infrastructure to meet their daily needs.

Comprehensive and co-ordinated development

2.33 The Council will expect developers to take a comprehensive approach to site design and layout, to optimise development potential across the whole site and wider area, and deliver the Council's wider place making ambitions. This could be achieved through the use of masterplans and/or design codes for a site/wider area.

2.34 Where development sites adjoin each other, or are in multiple ownership, the Council will expect developers to work together to bring forward coherent and integrated development proposals for the whole area. This could be achieved by the preparation of a joint masterplan. As part of this, the Council will expect developers to look at the relationship between adjacent sites, in terms of design, layout, land use and infrastructure requirements, and explore where connections can be made to facilitate movement between different areas.

2.35 The Council will also expect developers to work together and take a co-ordinated approach to the delivery of development, to ensure that new homes, jobs and services, along with the infrastructure required to support them, are delivered in a timely way. Piecemeal and uncoordinated development, where sites are taken forward in a fragmented or disjointed way, without a comprehensive plan, will be resisted.

Citizen Scientists

2.36 Camden Council and UCL's Institute for Global Prosperity have worked together to develop a citizen science pilot which will deliver community-based, practice-led research training in social science methodologies at UCL Citizen Science Academy for Camden residents. This will empower communities to lead change through social action and shape policies that impact their lives. The research will include a variety of data collection methodologies, from ethnographic research to interviews and quantitative surveys. This training will provide local residents with the skills to conduct research on what prosperity means to them, and how opportunities to prosper and live well are influenced by different factors. This will help in the development of neighbourhood profiles and identification of community needs and priorities which will inform and guide the Council's work across the borough, especially place-based work such as planning and regeneration, the State of Borough Report and Good Life Camden reporting.

2.37 The Council will seek to secure contributions from major developments, via Section 106 agreements, to help fund the Citizen Scientist's programme in Camden. The Citizen Scientist's research will be used to inform a variety of strategies and projects that will help ensure that the right infrastructure is provided to support growth and development in the borough. For example, their research will inform the preparation of masterplans and frameworks, development proposals and the work of the Area Regeneration Team. This is already being demonstrated in Euston, where the Euston Voices researchers have been paid and trained as Citizen Social Scientists to identify what the local priorities are for their community to prosper whilst major regeneration is underway.

03

South Camden

03
Chapter

South Camden

3.1 The south of the borough includes the neighbourhoods of Covent Garden, Holborn, Hatton Garden, Bloomsbury, Fitzrovia, Euston, Regent's Park, King's Cross and Somers Town.

3.2 At the heart of these neighbourhoods are strong and diverse residential communities.

3.3 These form part of a dense mix of uses, which include renowned institutions such as the British Museum, British Library and University College London; the focus of London's legal profession within Holborn and the jewellery trade in Hatton Garden; the retail, leisure and cultural attractions of the West End and Seven Dials; and the offices of major data science and life science businesses in the Knowledge Quarter.

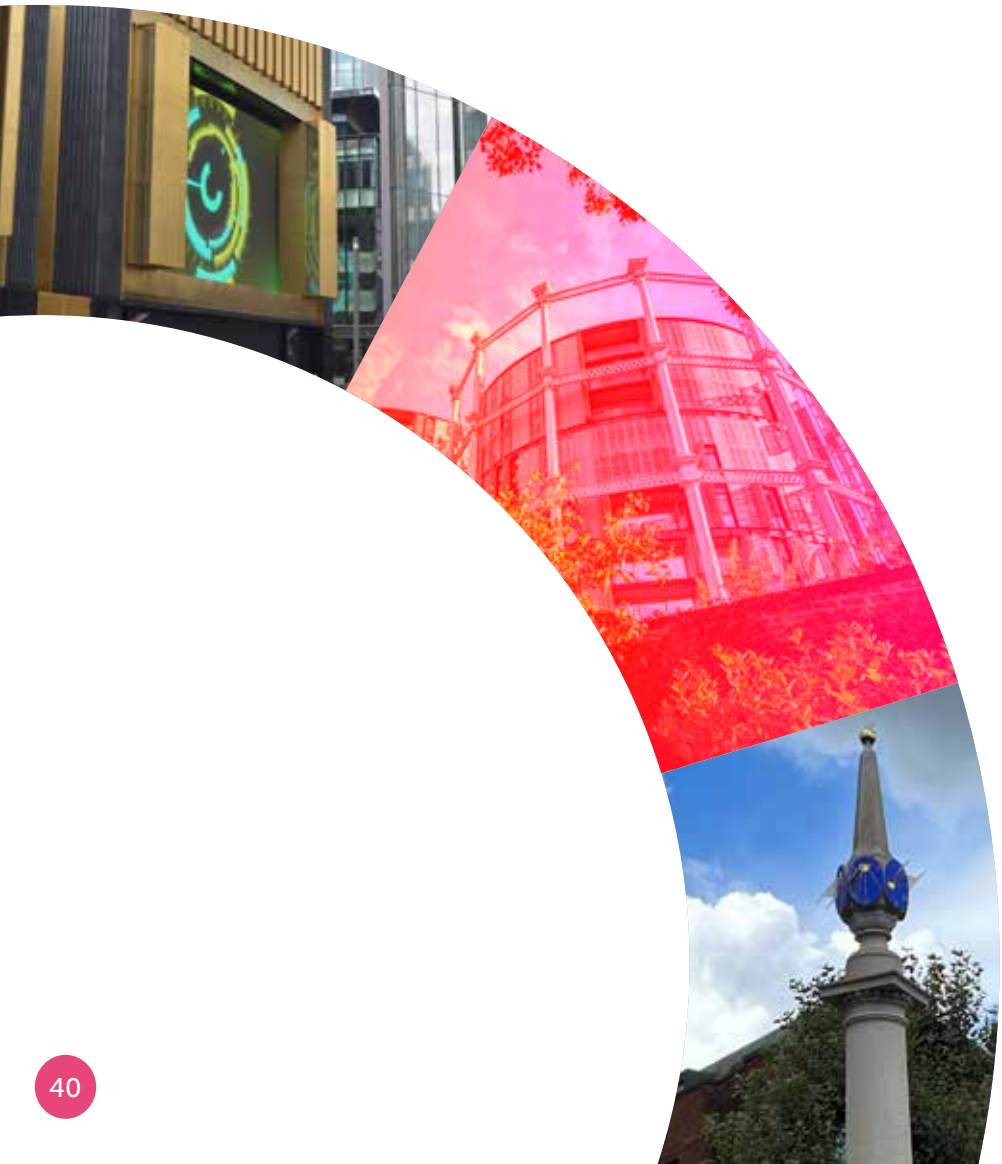


Figure 05:

South Camden

Key

- Neighbourhood Centres
- Central Activity Zones (CAZ)
- CAZ Retail Clusters
- Euston Plan Area
- Bloomsbury Campus Area
- Hatton Garden Jewellery Industry Area
- Specialist Area
- Open Spaces
- Conservation Area
- Railway Station
- Tube Station
- Regents Canal

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3.4 The area is characterised by a mix of historic and modern buildings of significant scale and at high densities. Large parts of the south of the borough are also covered by conservation areas, with historic London squares and high numbers of listed buildings.

3.5 The south of Camden is highly accessible and has excellent public transport links, with 9 underground stations, multiple bus routes and 3 major railway stations, connecting Camden with the rest of the UK and mainland Europe.

3.6 The area forms a significant part of London's Central Activities Zone (CAZ). The CAZ is a major business and employment centre, and contains a significant proportion of the borough's office floorspace. It is home to clusters of financial and professional services, technology and creative industries, and also to specialist clusters of medical excellence, data science, life science, research, and law. The CAZ also has a diverse leisure and retail offer focussed on a number of CAZ retail clusters and other specialist shopping areas.

3.7 CAZ retail clusters are major shopping areas within the Central Activities Zone. They generally either have an international, national or London-wide role in the shopping services that they provide, including a range of comparison or convenience goods and services for the local resident, worker and visitor populations. Camden has 4 CAZ retail clusters: Tottenham Court Road / Charing Cross Road / New Oxford Street; Holborn (High Holborn / Holborn and Kingsway); King's Cross / St Pancras (Euston Road); King's Cross Boulevard and Coal Drops Yard. There are also many distinct localities within Camden's CAZ Area which have specific characters. These contain clusters of specialist activities and in some instances also have concentrations of food, drink and entertainment uses. These specialist shopping areas are Covent Garden; Charlotte Street; Lamb's Conduit Street; Hatton Garden; Museum Street; and Denmark Street.

3.8 This part of the borough is also home to the Knowledge Quarter, centred around King's Cross and Euston. Since the last Local Plan was adopted in 2017, the Knowledge Quarter has expanded and consolidated its reputation as an internationally significant innovation district, harnessing collaboration between private sector companies, universities, hospitals and research establishments in fields such as medical and life sciences, data analytics and machine learning.

3.9 However, despite the focus on offices and research and knowledge based uses in this area, pockets of industrial land remain, with concentrations around Camley Street and St Pancras Way in King's Cross.

3.10 The south of the borough is well served by community facilities, with libraries in Pancras Square and Holborn; leisure centres in Pancras Square and Covent Garden; and a number of community centres.

3.11 The largest area of open space in this part of Camden is Regent's Park, which straddles both Camden and Westminster. Other significant areas of public open space include Camley Street Nature Reserve, St Pancras Gardens, Lincoln's Inn Fields, Russell Square Gardens, Coram Fields, Gordon Square and Tavistock Square. The majority of the south of the borough is well served by public open space, although the areas of Hatton Garden and Fitzrovia are comparatively less well served.

3.12 Part of the south of the borough is covered by the Camley Street Neighbourhood Plan. This sets out the community's aspirations and planning policies for that area. The Neighbourhood Plan is part of the Council's statutory development plan and is taken into account, alongside our own policies, when making decisions on planning applications in that area. Neighbourhood Areas have also been designated at Somers Town, Mount Pleasant, Fitzrovia East and Drummond Street. Somers Town is part of the GLA's Future Neighbourhood 2030 programme, which supports neighbourhoods to become exemplars for sustainability and innovation. Development coming forward in this area should therefore have regard to the Somers Town Future Neighbourhood 2030, where relevant.

3.13 The main focus of development in the south of the borough over the last 10 years has been at King's Cross central, however development there is nearly complete. Looking forward, major development is planned at Euston, and this will be guided by the Local Plan and the Euston Area Plan, which sets out the planning framework for the site. A number of other locations in this area are also expected to deliver new homes, jobs and infrastructure to support Camden's communities. The most significant is at Camley Street, where there is opportunity for intensification and diversification to create a new neighbourhood, while ensuring the continued provision of employment uses in a way that makes the most effective and efficient use of the land available. Further development is also planned around Holborn, guided by the Council's Holborn Vision, and through the Council's Community Investment Programme. The policy on page 44 sets out the Council's strategy for the south of the borough to guide the future development of this area. Information on key infrastructure programmes and projects in the south of the borough are set out separately in the Council's Infrastructure Delivery Plan.

Figure 06:

Key areas of development in South Camden

Key

- Key Areas of Development
- CIP Regeneration Schemes
- Open Spaces
- Regents Canal
- Central Activities Zones (CAZ)
- CAZ Retail Clusters

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Policy S1
South Camden

A. The Council will ensure development in the south of the borough contributes to the area's continued success and London-wide role, while delivering social, economic and environmental benefits for Camden's residents, making the area a more liveable, climate resilient and inclusive place.

New homes

B. Sites are allocated in the south of the borough through the Local Plan and the Euston Area Plan to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocation policies set out below and in the Euston Area Plan.

C. The focus of development in the south of Camden will be at Euston, where major development is planned, and the areas around King's Cross and Holborn, with limited development expected in the Tottenham Court Road Opportunity Area (as defined in the 2021 London Plan), as development there is largely complete.

D. Development at Euston will be guided by the policy framework set out in the Euston Area Plan and the Local Plan, and is expected to deliver between 1,500 and 2,500 new homes. These are likely to come forward towards the end of the Local Plan period.

E. Development in the King's Cross area will mainly be delivered through site allocations at Camley Street and St Pancras Way, which will be expected to deliver approximately 1,380 new homes. This area has the potential to strengthen its role as a location for employment and business; and deliver a significant increase in the number, mix and affordability of homes; to enable the area to fully realise its potential and become a more distinctive, vibrant, and mixed urban neighbourhood. To deliver the Council's and community's vision and objectives for this area, we will expect development to be taken forward in accordance with the Canalside to Camley Street Supplementary Planning Document and the Camley Street Neighbourhood Plan.

F. Development around Holborn has the potential to strengthen the area's role as a location for business, supported by the enhanced access brought by the Elizabeth Line. It will create more vibrant and better connected neighbourhoods in the heart of central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and much-needed new self-contained homes. Sites have been allocated to deliver approximately 250 new homes. To deliver the Council's vision and objectives for Holborn, the Council will expect development in this area to be taken forward in accordance with the Holborn Vision Supplementary Planning Document.

Policy S1
South Camden

G. The Council is committed to a programme of estate renewal and regeneration delivered through the Council's Community Investment Programme (CIP). The main focus of this work in the south of the borough is the Agar Grove Estate; north of Camley Street; Regents Park north; and the Tybalds Estate in Holborn. Development coming forward in the south of the borough will be required to support the Council's estates mission set out in We Make Camden and assist with the delivery of the Council's priorities for nearby housing estates.

H. Where sites in this area that are not allocated come forward for housing development, these will be determined in accordance with the policies in this Plan.

Employment and the economy

I. New employment floorspace (including laboratory, or lab enabled, floorspace) will be delivered in the south area of the borough through site allocations in the Local Plan and Euston Area Plan, existing planning permissions and the development of other sites.

J. The Central Activities Zone (CAZ) and the Knowledge Quarter centred on King's Cross and Euston will continue to be the main focuses of employment development in Camden.

K. The Council will support the Knowledge Quarter to thrive as a hub of innovation and knowledge-intensive industries in line with the KQ2050 Strategy, and ensure that its growth and development are inclusive, sustainable, and community-focused. To ensure the sustainable growth and success of the Knowledge Quarter, major proposals for additional employment, research and/or learning floorspace within this area will be required to contribute to reducing inequalities and increasing life chances in local residential communities by maximising community benefit at the planning, construction and end-user phases, including supporting increased access to jobs, skills training and educational opportunities.

L. The Council will ensure that new employment development in the south area is designed in a way that fosters openness and inclusivity by avoiding closed 'campus-style' developments and enabling wider public access to facilities such as lobby spaces, roof gardens, cafes, and gyms wherever possible.

M. The Council will support the specialist clusters of activity in the CAZ, including the centres of medical excellence at University College Hospital, the Wellcome Trust, Oriel and Great Ormond Street; life sciences research at the Francis Crick Institute; and the centre for law and the legal profession at Lincolns Inn in Holborn.

Policy S1
South Camden

N. The Council will support the Bloomsbury Campus Area to maintain and expand its role as the heart of higher education in Camden in line with Policy S4 below and is taking forward a public realm strategy for this area, across land ownership boundaries, though the Bloomsbury Vision.

O. The Council will continue to protect and promote the specialist employment area of Hatton Garden as a location for jewellery-related uses in accordance with Policy S3 below.

P. The Council will continue to manage and protect the supply of non-designated industrial land in this area in line with Policy IE3 (Industry). The Council will ensure that development on allocated sites at Camley Street and St Pancras Way reprovides and intensifies the amount of employment floorspace across these sites including the appropriate reprovision of industrial, storage or distribution floorspace that supports the functioning of the CAZ and local economy, as part of mixed-use intensification proposals on individual sites or across multiple sites through a wider area plan.

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.

Retail and town centres

R. The majority of new retail development in the south of the borough is expected to be delivered through development at Euston, towards the end of the Plan period, with additional provision to be made as part of re-use and re-development schemes coming forward in the CAZ retail clusters of Tottenham Court Road / Charing Cross Road / New Oxford Street and High Holborn / Kingsway.

S. The Council will support and protect the CAZ retail clusters, Specialist Shopping Areas and Neighbourhood Centres in the south of the borough, in accordance with Policy IE6 (Designated Centres and Essential Services), to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors. As part of this, the Council will continue to manage the location and concentration of food, drink and entertainment uses in this area and their impact.

T. The south of the borough is also a key focus of the evening and night-time economy in Camden, and the Council will support efforts to widen the range of evening and night-time economy uses in the CAZ retail clusters, particularly where this will benefit local residents and people working night shifts, in line with the objectives set out in the Council's Evening and Night-time Economy Strategy.

Policy S1
South Camden

Infrastructure

U. To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure, from appropriate development. The Council will work with relevant providers to ensure that the necessary infrastructure is secured, in order to provide the facilities needed for the borough's communities. Key priorities for the south of the borough include:

1. the delivery of a new High Speed 2 station and mainline station improvements at Euston;
2. the transformation of Euston Road and the removal of the King's Cross gyratory;
3. the delivery of an extensive "Liveable Neighbourhood" scheme in Holborn, with new areas of public realm and significant road safety improvements for pedestrians and cyclists, building on the success of the West End Project;
4. planned station upgrade at Holborn Underground station to increase capacity and provide step-free access from street to platforms;
5. the delivery of new and improved pedestrian and cycle links in accordance with the Council's Transport Strategy;
6. the creation of a new canal crossing to improve connectivity between King's Cross, Camley Street and St Pancras Way;
7. to connect, improve, make public and, where possible, reinstate historic lanes, alleyways and passages in and around Holborn to increase permeability and encourage walking;
8. the roll-out of the Council's neighbourhood-based Safe and Healthy Streets scheme across this area, delivering through-traffic reduction and other Healthy Streets measures;
9. the upgrade of the North London Line, to reinstate four tracks and deliver a third platform at Camden Road overground station from 2030, to meet future passenger and freight demand;
10. the Camden Highline, an elevated walkway between King's Cross and Camden Town;
11. the delivery of an Integrated Care Hub;
12. the delivery of improvements to the Oasis Sports Centre;
13. the delivery of the Bloomsbury Vision, which seeks to improve the public realm in and movement in and around the Bloomsbury Campus area, through the delivery of public realm improvements, highways greening measures, improved connections and new routes and enhanced signage to aid navigation;
14. the delivery of the Bloomsbury Green Corridor, a project to create a pedestrian friendly network of green links between existing open spaces, institutions and transport hubs, providing a vital element in the connection between Euston and the River Thames with the aim of creating a more climate resilient environment. This project is part of the delivery of the wider Camden Green Network stretching from Hampstead Heath to the River Thames;
15. the delivery of sustainable drainage and urban greening measures; and
16. delivering new and enhanced areas of public open space and play facilities and improving access to open spaces and nature, in line with Policy SC4 (Open Space).

Euston area

3.14 Euston is identified as an Opportunity Area in the London Plan 2021, with significant potential for intensification and an opportunity to comprehensively transform Euston Station and the immediate area into a world-class transport interchange and new residential and business district, delivering new homes and jobs.

3.15 To guide development and change at Euston, the Council, working in partnership with TfL and the GLA, prepared the Euston Area Plan (EAP), which was adopted in 2015. The EAP sets out the planning framework to guide transformational change in the area, focused on the redevelopment of Euston Station. It sets strategic policy for new development in the Euston area, illustrating where new open spaces and buildings could be, and what proposed uses could be (homes, shops, employment, community facilities). It provides guidance on important design considerations and enabling sustainable travel in and through the area. It also seeks to secure significant benefits from regeneration for the local community and London as whole.

3.16 To ensure the Council has an up-to-date policy framework to guide decisions at Euston, an updated Euston Area Plan has been produced. The new EAP sets strategic objectives and guidelines for development at Euston, in addition to allocating sites for development to deliver new homes and jobs.

3.17 Policy S2 sets out the Council's overarching approach to delivering development at Euston and should be read in conjunction with the EAP.

Figure 07:

Euston Area

Policy S2
Euston Area

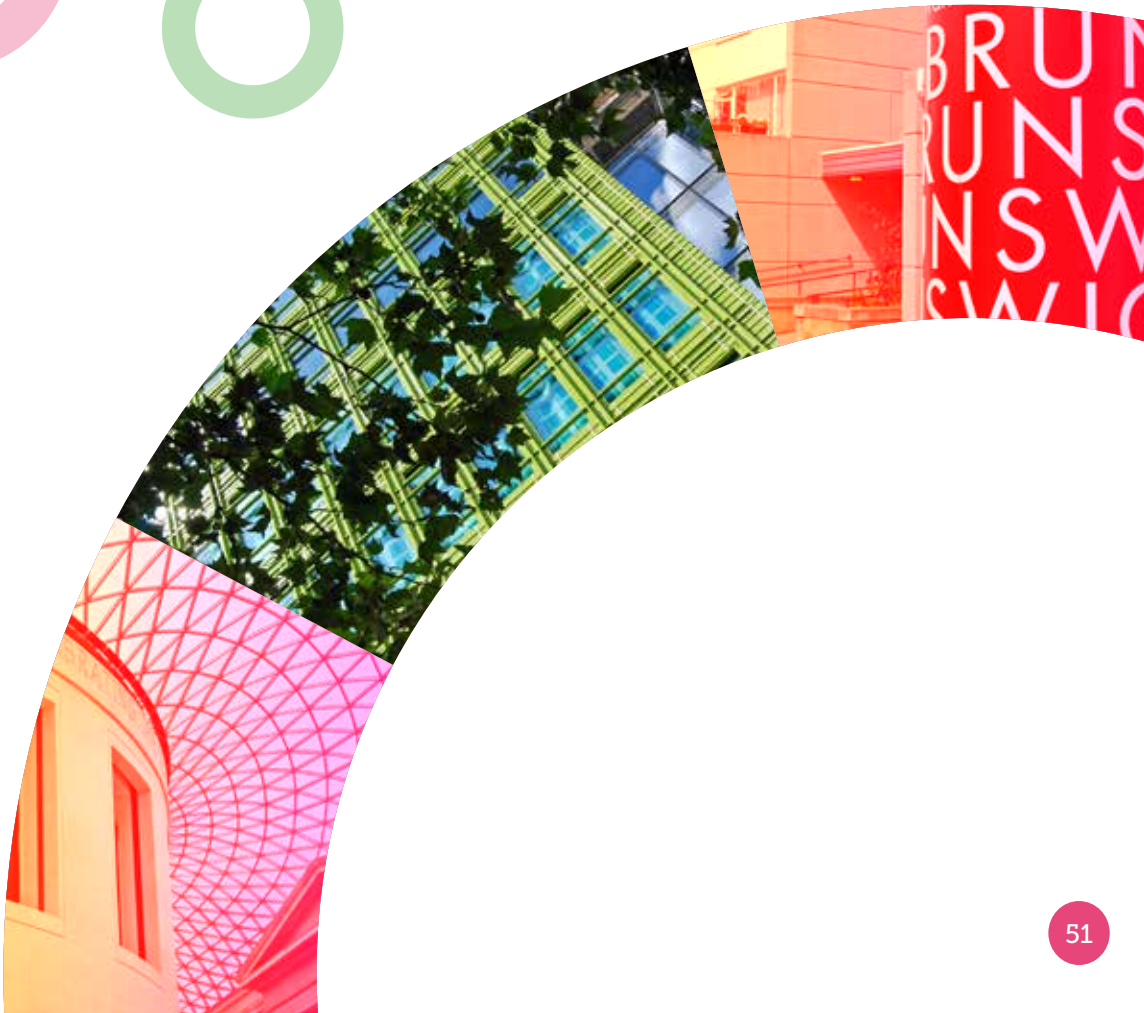
A. To realise the vision and objectives set out in the Euston Area Plan, the Council will:

1. seek to prioritise local need, ensuring that development contributes to reducing inequalities, improving health and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed;
2. expect development at Euston to deliver between 1,500 and 2,500 additional homes in total, along with the provision of appropriate replacement homes;
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 research, learning and knowledge-based uses;
4. expect development to deliver new and replacement retail and leisure floorspace, to contribute to the creation of vibrant streets and reinforce the role of existing centres;
5. seek the provision of, and contributions to, the delivery of infrastructure to support new development and reflect local priorities and needs, in accordance with the infrastructure needs and priorities set out in the Euston Area Plan;
6. expect development to create a network of new and improved open spaces to replace lost open spaces and meet the needs of new development;
7. expect the re-development of Euston Station and associated development to be of excellent design, providing a world class, integrated station and transport interchange and a welcoming environment to residents and station users;
8. seek to improve connectivity both within the Euston Area, and to the wider area, including north towards Camden Town and south to Bloomsbury and the River Thames, reducing the barrier effect of the Euston Road and encouraging sustainable and active travel;
9. expect the development to be taken forward in a coordinated and phased way, recognising the importance of successful and thoughtful meanwhile uses, to energise spaces, deliver social and economic benefits, and open up opportunities to new ventures; and
10. expect development to integrate high environmental standards, planting, biodiversity and green infrastructure, supporting a circular economy and contributing to improvements in air quality.

3.18 The Council will expect development proposals coming forward at Euston to be in accordance with this strategy to deliver local priorities and maximise community benefit at the planning, construction and end user phases, ensuring that all aspects of development promote health and well-being and address concerns around safety and security.

3.19 The Council will continue to work with partners to take forward the redevelopment of Euston to secure long term benefits from the station redevelopment for existing neighbouring communities and mitigate the impacts of HS2 and other construction works on residents, businesses and visitors to the area.

3.20 Development proposals at Euston will be expected to have regard to this Local Plan, the Euston Area Plan and the London Plan, in addition to other relevant documents, which together form the basis for decision making in the Euston area.



Hatton Garden jewellery industry area

3.21 The Hatton Garden area is a historic jewellery quarter within London and the centre of the diamond trade in the UK.

3.22 It contains a number of small light industrial workshops and specialist jewellery retailing functions, and is an important contributor to Camden's creative industries. Ground floors along main frontages are dominated by jewellery retail uses. Around three-quarters of businesses in Hatton Garden deal with suppliers, makers and institutions located in the area, highlighting the tight interdependencies between the businesses involved. Hatton Garden is formally designated as a specialist area on the Local Plan Policies Map recognising its role and character.

3.23 The Camden Economic Needs Assessment found that the jewellery industry in the borough had experienced growth in recent years with over 530 businesses now in this cluster. However, it also notes concerns about the continued pressure from non-jewellery-related uses able to pay significantly higher rents. The ability to deliver significant additional floorspace is challenging without the conversion of existing office space.

Figure 08:

Hatton Garden jewellery industry area

Policy S3

Hatton Garden Jewellery Industry Area

A. The Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses in the Hatton Garden area. We will also resist the development of business premises and sites for a non-business use.

B. The Council will consider the development of premises or sites that are suitable for continued use as jewellery workshops provided that:

1. the level of jewellery workshop space is increased or at least maintained; and
2. existing businesses on the site are retained as far as possible.

C. Where proposals in Hatton Garden would increase the total gross internal area by more than 200sqm, we will seek 50% of the additional floorspace as affordable premises at 50% below market value for equivalent jewellery-related uses in the Hatton Garden area in perpetuity.

D. To protect the concentration of specialist jewellery, we will seek the retention of retail uses in the designated specialist area.

3.24 The Council will generally seek to resist the loss of viable jewellery workshop space. The conversion of premises will only be permitted where it can be demonstrated that they have been vacant and marketed for at least 12 months based on realistic rents for jewellery-related uses and where development of the site retains premises suitable for use as jewellery workshops as well as other appropriate uses. The marketing exercise must be specifically targeted towards the jewellery industry and through appropriate media. Furthermore, we will also resist the development of business premises and sites for a non-business use (as defined in the supporting text preceding Policy IE1 (Growing a Successful and Inclusive Economy) that support the jewellery industry in the Hatton Garden Area.

3.25 We will use planning obligations and conditions to ensure that premises provided for jewellery uses are suitable in terms of design, layout and affordability. There are a variety of workspace types occupied by jewellery businesses. Some manufacturing processes rely on the use of heavy equipment and gas extraction. Good natural light can also be critical. The cost of fit out will therefore be taken into account during the negotiation process as well as the period at which any discounted rent applies.

3.26 Where development would increase total gross floorspace by more than 200sqm, we will seek 50% of additional floorspace as affordable premises. In line with Policy IE4 (Affordable and Specialist Workspace) rents should be no more than 50% of the average for equivalent jewellery-related uses in the Hatton Garden area, however we will seek to negotiate the greatest discount to market rents that is viable.

3.27 Where workspace cannot be secured due to the nature of the site or the development, we will seek a financial contribution towards support for the jewellery industry, the level of contribution will be related to the area of workspace that would otherwise have been delivered in Hatton Garden. The requirement to provide workspace will take into account the current supply of space in the area.

3.28 The area has an important specialist retail function focussed at ground floor level around Hatton Garden (the street) and its immediate side streets. The Council will therefore support proposals that retain links with the jewellery industry.

Bloomsbury Campus Area

3.29 The Bloomsbury Campus Area extends over 22 hectares between Euston Station and the British Museum and contains a concentration of university-related buildings and activities.

3.30 The area is at the heart of higher education in Camden, providing the main base for the University of London and several member institutions including UCL (University College London), SOAS (the School of African and Oriental Studies), London School of Hygiene and Tropical Medicine, and Birkbeck.

3.31 The University provision in the Campus Area is complemented by many higher education institutions and facilities in other parts of the borough, such as the Royal Veterinary College and Central St Martins (University of the Arts), located north of St Pancras and King's Cross stations. Most of Camden's purpose-built student accommodation is also outside the area.

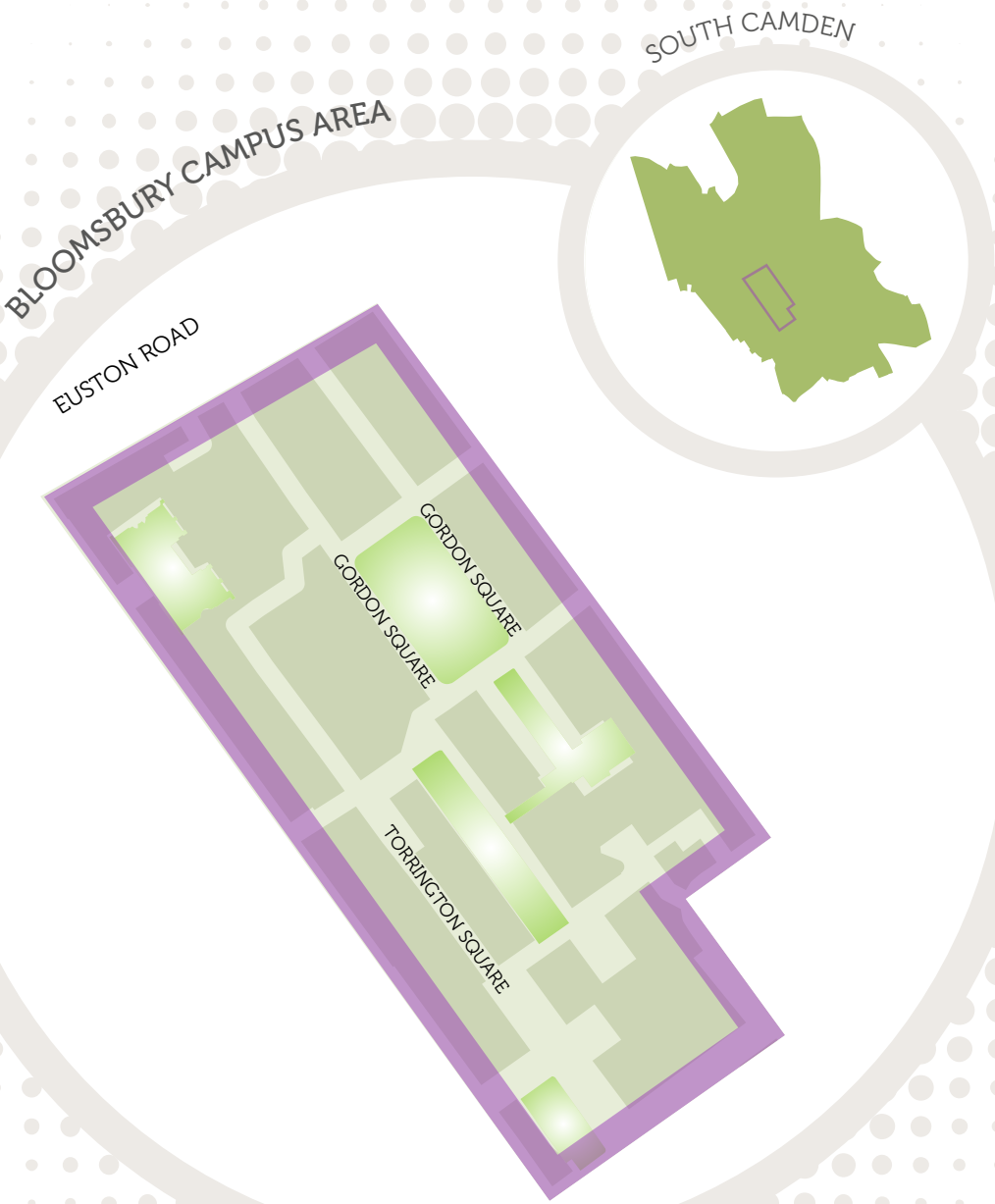
3.32 Higher education is a major contributor to the economy in Camden and London, both directly and through its influence on other activities (for example attracting international businesses and generating new start-up firms). Camden's universities are also a key component of the Knowledge Quarter and a major factor in the growth of the science and creative sectors.

3.33 The Council is also working in partnership with the universities in this area to develop a vision for the Bloomsbury Campus Area. This will set out an overarching strategy to guide the delivery of public realm improvements; new and improved routes and connections; wayfinding measures; urban greening; measures to support the evening and night-time economy; improved servicing and reduced parking in this area.

3.34 Policy S4 sets out the Council's priorities for the Bloomsbury Campus Area and supports the delivery of the Bloomsbury Vision.

Figure 09:

Bloomsbury Campus Area



Policy S4
Bloomsbury Campus Area

A. Development in the Bloomsbury Campus Area should seek to:

1. maintain and expand the role of the Bloomsbury Campus Area as the heart of higher education in Camden;
2. provide attractive and stimulating spaces for learning, research, sharing ideas, socialising, and supporting students;
3. be designed to feel welcoming and inclusive to students, workers, residents and visitors;
4. consolidate and increase academic space (including student support facilities and other ancillary space) in a way that celebrates the Universities' achievements and creativity and supports the Plan's other priorities for the Campus Area;
5. deliver sustainable growth through collaboration across institutions to mitigate and adapt to climate change, upgrade the Bloomsbury decentralised energy network, and reduce carbon dioxide emissions;
6. enhance the area's rich historic and architectural character, and respect its many heritage assets;
7. enhance open space, streets and footpaths, creating a coherent network which is publicly accessible and animated wherever possible and appropriate (for example, by cafes and restaurants);
8. make it easier to walk, wheel and cycle within and across the area, reducing the impact of motor vehicle traffic and parking, improving east-west links, enhancing Malet Street as a 'University High Street', and supporting a central focal point at Byng Place;
9. design improvements to public spaces and walking, wheeling and cycling routes to integrate with the design of the West End Project; and
10. seek provision of multi-purpose facilities that are shared with other organisations and the local community as far as possible.

B. Where higher education development is proposed in the Campus Area for the University of London or its member institutions, the Council will not require the inclusion of self-contained homes provided the development is publicly funded or serves a public purpose. We will support the development of student housing in the Campus Area to serve the University of London or its member institutions where it will not compromise meeting the need for additional academic space.

Priorities for development in the campus area

3.35 Policy S4 incorporates a number of priorities for the Campus Area drawn from university-produced Area Frameworks and the Bloomsbury Vision. The Council will expect development in the area to contribute to these priorities as far as possible, for example by: increasing the visibility of teaching, learning, and creative spaces; improving the landscaping of poor quality places such as the north end of Torrington Square and the margins of Woburn Square (for example, by removing hard surfaces, barriers and car parking, and enhancing planting and paving materials); and increasing the level of public access to privately-owned open spaces such as Malet Street Gardens.

3.36 The University Area Framework and the University of London's Zero-carbon Estates Handbook, which identify sustainability as a key objective, are consistent with the priority given to sustainable growth in Policy S4 and provide catalysts for collaboration between member institutions to tackle climate change. The sustainability and climate change requirements of the Local Plan and the London Plan will be applied to proposals in the Campus Area having regard to its particular characteristics and requirements.

3.37 The high priority given to the historic and architectural character of the Campus Area reflects its location wholly within the Bloomsbury Conservation Area, and the wealth of listed buildings it contains, including large academic buildings and terraces of nineteenth century houses (many of which now have university-related uses). The Campus Area also encompasses a number of public and private open spaces, including Woburn Square and Gordon Square Garden, which are London Squares with statutory protection. The north-eastern portion of the Campus Area is in the background of the London Plan landmark viewing-corridor from Greenwich Park (the General Wolfe Statue) to St Paul's Cathedral, and forms part of the wider setting consultation area for the view. Development in the Campus Area should accord with the design and heritage requirements of the Local Plan.

3.38 The West End Project is a programme of works to the public realm west and south of the Campus Area. The Project has created more people-friendly streets with less traffic, lower traffic speeds, wider pavements and better public spaces. Improvements to walking and cycling routes and the public realm in the Campus Area will create opportunities to reduce the impact of motor vehicle traffic and parking, and to extend the Project's principles by integrating the design of streets and spaces from Tottenham Court Road to Bedford Way. Enhancement measures could include removing intrusive car-parking and any unnecessary street furniture, rationalising short-stay cycle parking in the public realm, and providing covered and secure cycle-parking for long stays in locations that minimise its impact.

3.39 The Local Plan and the London Plan encourage multiple or shared use of educational facilities to provide access to the wider community and for social, cultural and leisure activities. In the Campus Area, the Council will encourage higher education development that includes multi-use facilities to serve residents, workers and visitors as well as students, and potentially provide a source of income.

Housing in the campus area

3.40 This Plan identifies self-contained housing as the Council's priority land use across the borough. However, given the existing concentration of higher education in the Campus Area, the benefits of co-locating university facilities, and the high value and limited supply of land, the Council will give a high priority to development of academic and ancillary facilities for the University of London in the Campus Area. Consequently, Policy S4 indicates that in specific circumstances we will not seek the inclusion of self-contained homes as part of development in the area.

3.41 Around a fifth of London's higher education students attend institutions in Camden, but we estimate that less than 1% live in the Campus Area. Additional student housing would benefit the area by increasing its sustainability and the levels of out-of-hours activity. These benefits do not outweigh the high priority we give to academic facilities for the University of London, and therefore Policy S4 indicates that we will support proposals for student housing in specific circumstances provided academic needs can also be met. Where these circumstances apply, we will also support suitable mixed-use proposals for academic space and student housing.

Site allocations

3.42 A number of site allocations are identified in the south of the borough, and these are shown on the map below and listed in Table 2. Site allocations in the Euston area are identified in the Euston Area Plan.

Figure 10:

Site allocations in South Camden

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Table 2 | Site allocations in South Camden

Site Reference	Previous Site Reference*	Site Name
S5	S4	120 – 136 Camley Street
S6	S5	104 – 114 Camley Street and Cedar Way Industrial Estate
S7	S6	24 – 86 Royal College Street (Parcelforce and former ATS Tyres Site)
S8	S7	St. Pancras Hospital
S9	S8	Shorebase Access
S10	S9	Bangor Wharf and Eagle Wharf
S11	S12	Former Royal National Throat, Nose and Ear Hospital
S12	S13	Belgrove House
S13	S14	Former Thameslink Station, Pentonville Road
S14	S15	Land at Pakenham Street and Wren Street
S15	S16	Land to the rear of the British Library
S16	S17	Former Central St Martins College
S17	S18	Selkirk House, 166 High Holborn, 1 Museum Street, 10 – 12 Museum Street, 35 – 41 New Oxford Street and 16a – 18 West Central Street
S18	S19	135-149 Shaftesbury Avenue
S19	S28	Cockpit Yard and Holborn Library
S20	N/A	York Way Depot and adjacent land at Freight Lane
S21	S20	Agar Grove Estate
S22	S22	6 St Pancras Way
S23	S23	Tybalds Estate
S24	S24	294 – 295 High Holborn
S25	S25	156 – 164 Gray's Inn Road
S26	S26	8 – 10 Southampton Row
S27	S30	Middlesex Hospital Annex, 44 Cleveland Street
S28	S31	Central Somers Town
S29	S32	Chalton Street, Godwin and Crowndale Estate
S30	S33	Birkbeck College, Malet Street
S31	S34	Senate House (NW quadrant), Malet Street
S32	S35	20 Russell Square

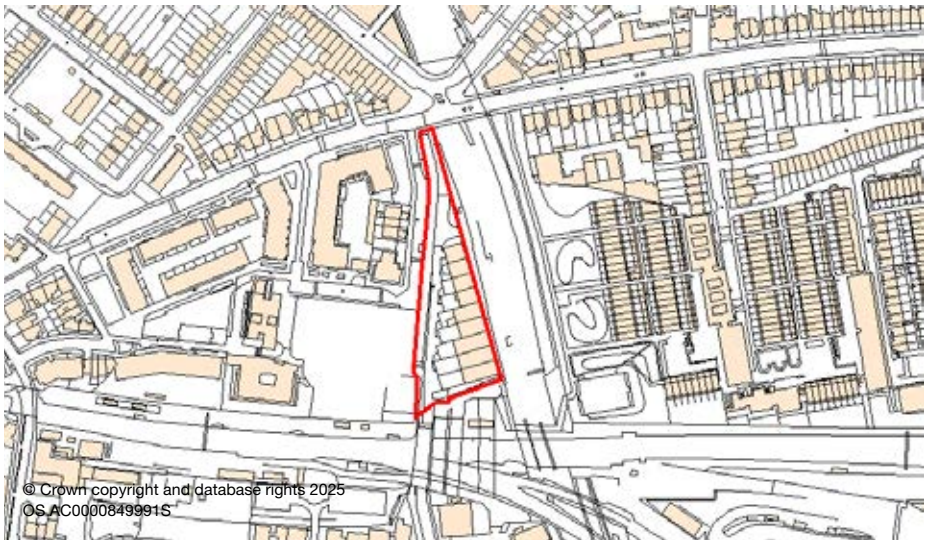
*Previous policy reference used in the draft Local Plan 2024

Allocation S5

120 – 136 Camley Street

Key plan

Site plan



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Area	0.5 hectares
Allocated Use	Permanent self-contained homes and employment (including light industrial, maker spaces, offices)
Indicative Housing Capacity	110 additional self-contained homes
Description of Existing Site	The site currently consists of nine small-scale workshop units sitting below street level, occupied by garages/car repairers. The site sits alongside the Agar Grove Estate, which is being redeveloped, and includes an important north - south cycle route.

Context

- The Camley Street Neighbourhood Plan recognises the potential for development on this site, and adjacent sites, and sets out a number of criteria to guide redevelopment.
- The Council's adopted Canalside to Camley Street Supplementary Planning Document envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.

Allocation S5

120 – 136 Camley Street

Development and Design Principles

Development must:

1. ensure that a comprehensive approach is taken to site design and layout, having regard to the Canalside to Camley Street Supplementary Planning Document and the Camley Street Neighbourhood Plan;
2. be taken forward in a coordinated way, working jointly with other landowners. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure;
3. intensify the employment floorspace on the site, with no net loss;
4. optimise the use of the site through efficient design, to enable the co-location of housing, employment and other proposed uses, whilst ensuring that the introduction of non-employment uses does not compromise the operation of employment uses;
5. optimise the provision of additional homes, which should form at least 50% of all additional floor area (GIA) proposed, potentially assessed in conjunction with the development of 104-114 Camley Street and Cedar Way Industrial Estate (Allocation S6);
6. make provision for the particular housing needs identified by Policy H6C where appropriate, and consider the inclusion of affordable housing for older people, or other people with care or support requirements, as a proportion of the additional affordable housing provision;
7. ensure that the design and layout of the scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities in accordance with the 'Agent of Change' principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity);
8. be designed to minimise the impact of operational vehicles, parking and servicing on existing streets, by coordinating and incorporating shared access points, and off street parking and servicing arrangements with compatible neighbouring uses;
9. be designed to create a stronger entrance into the wider area, and promote a strong sense of arrival to draw more people into and through the area; and
10. seek to provide a larger biodiversity corridor to enhance the north London Line at York Way.

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

Allocation S5

120 – 136 Camley Street

Infrastructure Requirements

Development must:

11. contribute towards public realm and connectivity enhancement projects along Camley Street, to strengthen it as a key route for all cyclists and pedestrians, through:
    a. the provision of a new public space and urban greening to improve the entrance from Agar Grove and the approach from the south under the adjacent bridge. This should include a coordinated route along/across the boundary with Agar Grove Estate (site S21);
    b. the provision of a new public space and urban greening to improve the entrance from Agar Grove and the approach from the south under the adjacent bridge. This should include a coordinated route along/across the boundary with Agar Grove Estate (site S21);
    c. the provision of an improved pedestrian and cycle route to the Maiden Lane estate;
    d. contributing to improvements to the north Camley Street bridge underpass. This should consider opportunities to open up the adjacent railway arches;
    e. safeguarding a future access point to the Camden Highline; and
12. seek to contribute towards improved access to bus services on Agar Grove.

Other Considerations

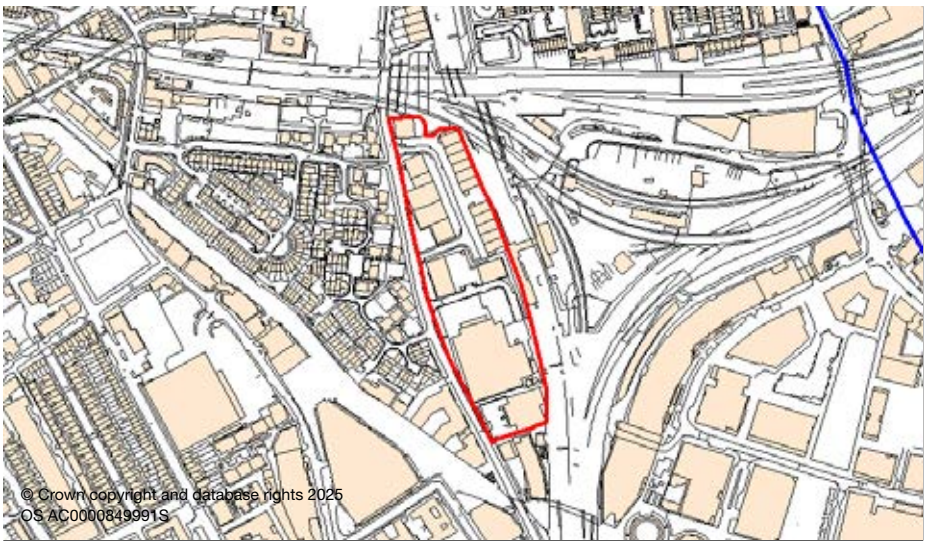
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Thames Water have suggested that the location 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.
- Two viewing corridors, identified in the Mayor's London View Management Framework SPG, cross the site.
- 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).

Allocation S6

104 – 114 Camley Street and Cedar Way Industrial Estate

Key plan

Site plan



Area	2.5 hectares
Allocated Use	Permanent self-contained homes and employment (including research and knowledge-based uses, light industrial, maker spaces, offices)
Indicative Housing Capacity	A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2. Capacity has been estimated at 750 additional self-contained homes, but should relate to the scale of all additional floor area (GIA) proposed, and potentially be assessed in conjunction with the development of 120 – 136 Camley Street (Allocation S5).
Description of Existing Site	The site is located between Camley Street to the west and railway lines to the north and east. The 120 Camley Street site and the Agar Grove Estate lie to the north. There are some recently developed sites to the south that contain a mix of self-contained homes and student accommodation alongside retail and workspaces focused on small business incubator and move-on spaces. The site is a non-designated industrial area occupied by low rise commercial units of varying condition and is currently home to a range of uses including food processing and supplies, designers, heating and plumbing supplies, wholesale warehousing and distribution, IT services and offices.

Context

- The Camley Street Neighbourhood Plan recognises the potential for development on this site, and adjacent sites, and sets out a number of criteria to guide redevelopment.
- The Council's adopted Canalside to Camley Street Supplementary Planning Document envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.

Allocation S6

104 – 114 Camley Street and Cedar Way Industrial Estate

Development and Design Principles

Development must:

1. ensure that a comprehensive approach is taken to site design and layout, having regard to the Canalside to Camley Street Supplementary Planning Document and the Camley Street Neighbourhood Plan;
2. be taken forward in a coordinated way, working jointly with other landowners. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure;
3. intensify the employment floorspace on the site, with no net loss;
4. optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area proposed;
5. optimise the use of the site through efficient design, to enable the co-location of housing, employment and other proposed uses, whilst ensuring that the introduction of non-employment uses does not compromise the operation of employment uses;
6. provide a variety of employment spaces and facilities that meet the needs of both existing and new business uses, such as light industrial, designer/maker, creative industries, research and knowledge-based uses, and other industrial uses that support the local economy and the Central Activities Zone;
7. make provision for the particular housing needs identified in Policy H6C where appropriate, and consider inclusion of affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision;
8. ensure that the design and layout of the scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities in accordance with the 'Agent of Change' principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity);
9. include the provision of free, publicly accessible toilets suitable for a range of users, including changing places toilets, and free drinking water;
10. be designed to include wide pavements lined with trees to help integrate the site with the surrounding area;
11. seek to create active street frontages by having doors and windows facing routes and spaces;
12. establish a series of integrated new routes and a network of open spaces and public areas of different forms and functions across the site, including places to relax, play and grow food;
13. explore opportunities to unlock east – west connections, to enhance links with other developments, neighbourhoods and new homes and employment spaces and improve access to nearby community and health facilities;
14. seek to provide a larger biodiversity corridor to enhance the north London Line at York Way which is a Grade II Site of Importance for Nature Conservation;
15. ensure that proposals for the redevelopment of this site appropriately consider their impact on the railway and its operations; and
16. be designed and located so as not to prejudice the continued operation of the aggregates transhipment facility which straddles the railway immediately east of this site.

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

Allocation S6

104 – 114 Camley Street and Cedar Way Industrial Estate

Infrastructure Requirements

Development must:

17. contribute towards public realm and connectivity enhancement projects along Camley Street through:
    a. the provision of a new and improved public realm and spaces to improve the entrance into Camley Street from Agar Grove, Barker Drive and approaches from the south to create a pleasant, attractive and green walking, wheeling and cycling route;
    b. the provision of an improved pedestrian and cycle route to Maiden Lane Estate;
    c. improvements to the north Camley Street bridge underpass. This should consider opportunities to open up adjacent railway arches; and
18. contribute to the creation of a new canal crossing to improve connectivity between King's Cross, Camley Street and St Pancras Way.

Other Considerations

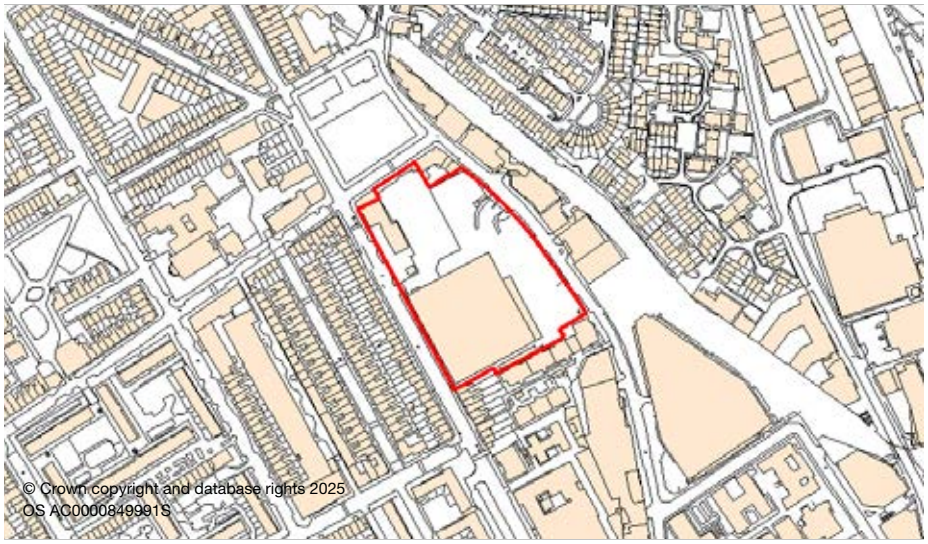
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Applicants will be expected to 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.
- There is a critical trunk sewer running through this site which would need to be appropriately considered through the planning and design stage.
- Two viewing corridors, identified in the London View Management Framework SPG, cross the site.
- 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).

Allocation S7

24 - 86 Royal College Street (Parcelforce and former ATS Tyres Site)

Key plan

Site plan



Address	24- 86 Royal College Street (Parcelforce and former ATS tyre site)
Area	1.53 hectares
Allocated Use	Permanent self-contained homes and employment (including research and knowledge-based uses)
Indicative Housing Capacity	280 additional self-contained homes
Description of Existing Site	The site sits between Royal College Street and St Pancras Way, which are both busy north - south vehicular routes. The majority of the site has been used as a parcel sorting office and depot for many years in a large two-storey building with a substantial yard/car park. The northwest corner of the site was formerly used for car maintenance and MOT operations; however this part of the site is now vacant and has been cleared.

Context

- The site is in close proximity to the Regent's Canal and King's Cross St Pancras Conservation Areas, although the existing buildings are not within a conservation area and are not identified as heritage assets. A number of properties on Royal College Street and Pratt Street are Grade II listed.
- The Council's adopted Canalside to Camley Street Supplementary Planning Document envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.
- Planning permission (2020/0728/P) for a health care facility was granted in February 2021 for 80 - 86 Royal College Street, the part of the site previously occupied by ATS tyres.

Allocation S7

24 - 86 Royal College Street (Parcelforce and former ATS Tyres Site)

Development and Design Principles

Development must:

1. ensure that a design-led approach is taken to delivering the optimum amount of development on the site, and that where demolition is proposed it should be justified in accordance with Policy CC2 (Retention of Existing Buildings);
2. ensure that a comprehensive approach is taken to site design and layout, having regard to the Canalside to Camley Street Supplementary Planning Document;
3. be taken forward in a coordinated way, working jointly with other landowners. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure;
4. intensify employment uses on the site, ensuring no net loss of floorspace, alongside the introduction of residential accommodation;
5. optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area proposed;
6. be designed to sensitively respond to the adjacent conservation areas and heritage assets;
7. be designed to integrate with the surrounding area through the creation of a permeable layout, the use of a finer grain of building blocks, and the creation of new public routes and spaces through the site;
8. make provision for particular housing needs identified by Policy H6C where appropriate, and consider the inclusion of affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision;
9. include more active and engaging street-level elevations and frontages around the site, particularly those addressing St Pancras Way and Royal College Street; and
10. use opportunities to set back building lines to accommodate urban greening and street tree planting.

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

Allocation S7

24 - 86 Royal College Street (Parcelforce and former ATS Tyres Site)

Infrastructure Requirements

Development must:

11. make provision for an inclusive public green space on site, alongside other smaller green and amenity spaces required for the proposed uses;
12. contribute towards improvements to the cycleway along Pratt Street; and
13. contribute to the creation of a new canal crossing to improve connectivity between King's Cross, Camley St and St Pancras Way.

Other Considerations

- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.
- 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).

Allocation S8

St Pancras Hospital

Key plan

Site plan

Area	2.18 hectares
Allocated Use	Health, permanent self-contained homes, education, employment (including research and knowledge based uses, light industrial, maker spaces, offices)
Indicative Housing Capacity	200 additional self-contained homes
Description of Existing Site	St Pancras Hospital sits at a prominent location on St Pancras Way, with St Pancras Church and Gardens to the south and 6 St Pancras Way (formerly referred to as 'Ugly Brown Building') to the north. The site is bounded by a long expanse of high walls. Access to the site is from St Pancras Way and Granary Street which links onto Camley Street.

Context

- The site is within the St Pancras Gardens sub-area of the King's Cross St. Pancras Conservation Area and adjacent to the Regent's Canal conservation area. The King's Cross and St. Pancras Conservation Area appraisal identifies a number of positive contributors within and adjacent to the site.
- The appraisal notes that the east and west Hospital Wings and the Residence Building around the edge of the listed St Pancras Gardens are arguably the most cohesive and important collection of buildings on the site and that the water tower in the central section is a distinct landmark.
- St Pancras Gardens is also a Grade 2 Site of Importance for Nature Conservation.
- Planning permission has been granted (2020/4825/P) on part of the site for a new purpose-built facility for Moorfields Eye Hospital, University College London and Moorfields Eye Charity.
- The continued use of the site for health purposes is supported. The priority for the part of the site not occupied by health facilities is permanent self-contained homes.
- The Council's adopted Canalside to Camley Street Supplementary Planning Document envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.

Allocation S8
St Pancras Hospital

Development and Design Principles

Development must:

1. ensure that a comprehensive approach is taken to site design and layout, having regard to the Canalside to Camley Street Supplementary Planning Document and the planning permission for a new purpose-built facility for Moorfields Eye Hospital granted for part of the site (2020/4825/P);
2. be taken forward in a coordinated way, working jointly with other landowners. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure;
3. optimise the provision of permanent self-contained homes and ensure that the delivery of new permanent self-contained homes is prioritised over the provision of employment and other non-health related uses;
4. be designed to conserve or enhance existing heritage assets, including building, spaces and the adjacent St Pancras Gardens, recognising their contribution to the character of the conservation area, and seek to retain and restore buildings that make a positive contribution in accordance with Policy D5 (Historic Environment);
5. explore opportunities to create an active and engaging street frontage along Granary Street and St Pancras Way;
6. create new public routes for pedestrians and cyclists to provide a connection from St Pancras Way to Granary Street, 101 Camley Street and the Regent's Canal, and to the adjacent 6 St Pancras Way development site to the north of Granary Street;
7. explore opportunities to integrate the open space and landscaping proposals between the north-east corner of the site and public realm spaces created at 101 Camley Street and 6 St Pancras Way to optimise the quality of open space provision and help facilitate canalside access and views;
8. reinforce the role of the Granary Street / Camley Street junction as a key gateway location;
9. be designed to improve the visual relationship with, and access from, northern Somers Town; and
10. incorporate measures to manage the effects of lighting on the Canal to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.

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

Allocation S8
St Pancras Hospital

Infrastructure Requirements

Development must:

11. contribute to the creation of a new canal crossing, to improve connectivity between King's Cross, Camley Street and St Pancras Way.

Other Considerations

- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.
- Part of the site is within a viewing corridor set out in the London View Management Framework SPG.
- 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).

Allocation S9

Shorebase Access

Key plan

Site plan

Address	Shorebase Access Land, Pancras Road, NW1 1UN
Area	0.19 hectares
Allocated Use	Permanent self-contained homes and student accommodation and offices
Indicative Housing Capacity	41 additional self-contained homes
Description of Existing Site	The site is an undeveloped parcel of land on Pancras Road surrounded by large fences and gates. It is used to access the railway tracks at St Pancras Station to service train operations. Although relatively small in scale, there is the potential for it to be redeveloped and still be used as an access point. There are a mix of uses around the site. Directly opposite there is a series of small-scale retail and business units, with housing behind and further along Pancras Road. The site is directly south of St Pancras Old Church and Gardens.

Context

- The site is within the King's Cross and St Pancras Conservation Area and in close proximity to the Grade II* St Pancras Old Church and Grade II listed church gardens. St Pancras Gardens is a Grade II Site of Importance for Nature Conservation.
- The Council's adopted Canalside to Camley Street Supplementary Planning Document envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance, and developers will be expected to have due regard to this.

Allocation S9
Shorebase Access

Development and Design Principles

Development must:

1. deliver a housing-led mixed use scheme;
2. optimise the provision of permanent self-contained homes having regard to Policies H1 (Maximising Housing Supply) and H2 (Maximising the supply of self-contained housing from mixed use schemes), and the scale of additional floor area (GIA) proposed. Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation);
3. ensure that the design and layout of the scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities in accordance with the 'Agent of Change' principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity);
4. respect the setting and views of the listed St Pancras Old Church and St Pancras Gardens;
5. retain and enhance the green buffer at the northern end of the site through the provision of new trees and planting, to help preserve and enhance the tranquil nature of the listed St Pancras Old Church and St Pancras Gardens;
6. create a more active and engaging street frontage addressing Pancras Road; and
7. ensure that operational access to the Shorebase logistics facility is maintained.

Other Considerations

- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.

Allocation S10
Bangor Wharf and Eagle Wharf

Key plan

Site plan

Address	Bangor Wharf and Eagle Wharf, Georgiana Street, London NW1 0QS
Area	0.25 hectares
Allocated Use	Permanent self-contained homes and employment
Indicative Housing Capacity	50 additional self-contained homes
Description of Existing Site	The site (consisting of Bangor Wharf and Eagle Wharf) is adjacent to the Regent's Canal and Gray's Inn Bridge. The site is bordered by the Canal to the northeast, by Georgiana Street to the southeast, and by a row of listed Georgian townhouses along Royal College Street to the southwest. It comprises hard standing and a range of buildings. Eagle Wharf is currently occupied as offices and studios. Bangor Wharf was used as offices and storage.

Context

- The site is within the Regent's Canal Conservation Area and the Conservation Area Appraisal and Management Strategy identifies the former forage warehouse at Eagle Wharf and former dock as positive contributors.
- The site is immediately adjacent to the Regent's Canal (Grand Union Canal), which is a designated Site of Importance for Nature Conservation (SINC), open space, and Green Corridor.
- The Council's adopted Canalside to Camley Street Supplementary Planning Document envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.

Allocation S10

Bangor Wharf and Eagle Wharf

Development and Design Principles

Development must:

1. ensure that a comprehensive approach is taken to site design and layout, having regard to the Canalside to Camley Street Supplementary Planning Document;
2. be taken forward in a coordinated way, working jointly with other landowners. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure;
3. optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area (GIA) proposed;
4. retain and enhance the wharf building at Eagle Wharf;
5. be designed to minimise potential conflicts between residential and other uses;
6. provide flexible space suitable for a range of employment uses;
7. provide an active frontage to Georgiana Street;
8. be of a form and scale which is appropriate to the Regent's Canal Conservation Area, and responds to the open character of this part of the Canal and to surrounding listed buildings, and respects the amenity of neighbouring residents;
9. seek to utilise the Canal for the transportation of goods and materials, both during construction and in the operation of the development;
10. ensure that the design and layout of the development responds positively to its canalside setting;
11. contribute to improvements in the biodiversity of the Canal, which is designated as a Site of Importance for Nature Conservation;
12. incorporate measures to manage the effects of lighting on the Canal to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species; and
13. retain or reuse (on site) the granite setts at Bangor Wharf.

Infrastructure Requirements

Development must:

14. consider the provision of infrastructure for canal moorings alongside the site.

Other Considerations

- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- The indicative housing capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- There is a critical trunk sewer running through this site which would need to be appropriately considered through the planning and design stage.
- 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).

Allocation S11

Former Royal National Throat, Nose and Ear Hospital

Key plan

Site plan

Address	330 Grays Inn Road, WC1 8DA
Area	0.61 hectares
Allocated Use	Employment (including research and knowledge-based uses), permanent self-contained homes
Indicative Housing Capacity	A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2. This has been assessed as 72 additional self-contained homes in the context of the development permitted, but provision in any subsequent scheme should relate to the scale of all additional floor area proposed.
Description of Existing Site	The site was previously occupied by the Royal National Throat, Nose and Ear Hospital, which has now been relocated to Huntley Street. The site has frontages to Grays Inn Road, Wicklow Street, Swinton Street and backs on to the railway cutting. The area around the site is home to a mix of different uses including retail, offices, hotels and housing.

Context

- Planning permission has been granted for a mixed use office development with lab-enabled floors, self-contained residential homes and a hotel with gym and restaurant use. (2020/5593/P).
- The site is within the King's Cross St Pancras Conservation Area. The Bloomsbury Conservation Area is located on the opposite side of Swinton Street to the south.
- The site's size and location mean that it could accommodate a range of different uses which would add to the vibrancy of the surrounding area and support key industries associated with the knowledge economy.

Allocation S11

Former Royal National Throat, Nose and Ear Hospital

Development and Design Principles

Development must:

1. be informed by a robust understanding of the context of the site and the merits of existing buildings and collections of buildings. Given the historic context of the site and its contribution to the wider conservation area, proposals for demolition / extension or redevelopment of buildings and collections of buildings must be clearly justified, and new development must be designed in a way that respects the character of the original buildings, their setting and the site as a whole; and
2. improve permeability across the site and the wider area by creating a new pedestrian route through the site.

Infrastructure Requirements

Development must:

3. make provision on-site for a pocket park / public amenity space, which should include new tree planting.

Other Considerations

- Planning permission has been granted for a development of up to 15 storeys on this site. Suitable heights for any subsequent scheme should be determined through a detailed assessment, particularly of heritage impacts, in accordance with Local Plan policies.
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.
- The need to protect the functioning of the Ear Institute from construction impacts associated with the development of this site needs to be carefully considered and agreed prior to the commencement of development.
- The site is within two viewing corridors set out in the London View Management Framework SPG.
- 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).

Allocation S12

Belgrove House

Key plan

Site plan

Area	0.4 hectares
Allocated Use	Research and knowledge-based uses (including offices) and permanent self-contained homes
Indicative Housing Capacity	A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2. This has been assessed as 32 additional self-contained homes (to be delivered off site) in the context of the development permitted.
Description of Existing Site	Belgrove House has now been demolished and the site cleared. It is a whole block site that is prominent in visual terms and located in an important historical context.

Context

- The site is within the King's Cross St Pancras Conservation Area, adjacent to the Bloomsbury Conservation Area and surrounded by a number of listed buildings, including King's Cross Station and St Pancras Station, which are Grade I listed.
- The site is adjacent to Argyle Square which is protected under London Squares Preservation Act 1931.
- Planning permission has been granted (2020/3881/P) for a commercial scheme, with off-site housing delivery for 32 homes planned on the Acorn House site nearby.
- If the planning permission is not implemented, a mixed use scheme remains the policy presumption, and the requirement for housing, and the case for off-site housing delivery, would need to be considered afresh, having regard to the scale of all additional floor area (GIA) proposed.

Allocation S12
Belgrove House

Development and Design Principles

Development must:

1. deliver a commercial-led mixed use scheme;
2. be of an exceptional standard of architecture, to enhance the setting of the area's rich character, heritage assets, including the Grade I stations, and open spaces;
3. provide visual connection with, and activity on, the side streets;
4. improve the site's relationship with Argyle Square; and
5. be designed to match the building line along Euston Road to allow for improved pedestrian movement.

Infrastructure Requirements

Development must:

6. integrate a step-free London Underground entrance within the site to enable the removal of the entrance structures to the front of the site;
7. deliver a range of community benefits, including enhanced education and employment opportunities;
8. include provision of community functions, such as genuinely flexible and affordable space for the local community; and
9. contribute towards public realm and highway improvements, including significant improvements to the pedestrian and cycling environments adjacent to the site.

Other Considerations

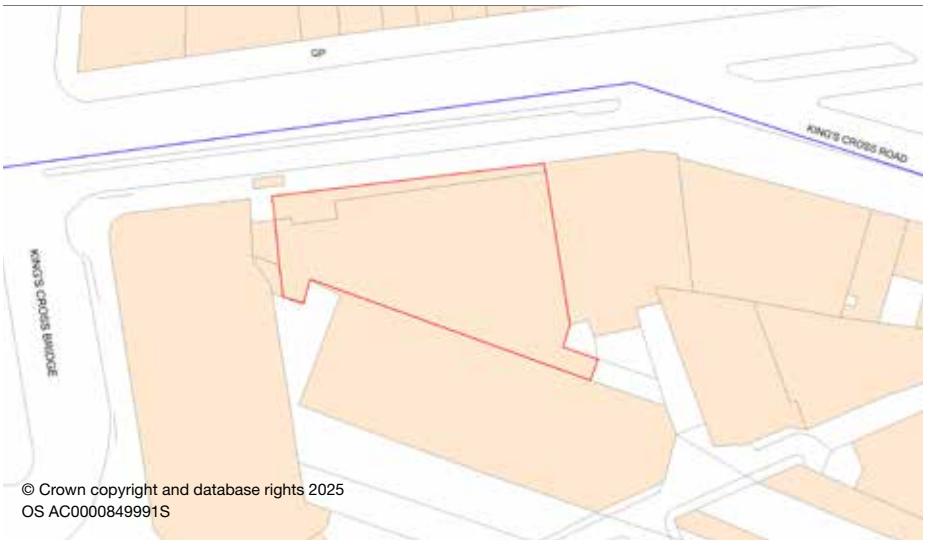
- Planning permission has been granted for a development of up to 10 storeys on this site. Suitable heights for any subsequent scheme should be determined through a detailed assessment, particularly of heritage impacts, in accordance with Local Plan policies.
- Opportunities to deliver a direct pedestrian crossing across Euston Road on the east arm of the Belgrove Street junction should be explored in consultation with Transport for London, alongside the relocation of the tube entrances.
- The site is covered by the Crossrail 2 Safeguarding Direction – Site of surface interest. Any future planning applications should be referred to Transport for London for comment.

Allocation S13

Former Thameslink station, Pentonville Road

Key plan

Site plan



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Area	0.06 hectares
Allocated Use	Employment (including research and knowledge-based uses, maker spaces, offices), and permanent self-contained homes
Indicative Housing Capacity	A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2. This has been estimated as 22 additional self-contained homes, but should relate to the scale of all additional floor area proposed.
Description of Existing Site	The site comprises of the single storey former Thameslink station entrance and ticket office fronting onto Pentonville Road. There is a basement level under the building and railway tracks immediately to the rear of the site at lower level. The site is adjacent to 257 – 259 Pentonville Road, which is Grade II listed and occupied by the Big Chill late night music venue; and the Scala music venue and snooker hall on the corner of Grays Inn Road and Pentonville Road.

Context

- The site is within the King's Cross St Pancras Conservation Area.
- The adjacent Scala building is a valued music venue and identified as a positive contributor to the conservation area. The Scala and the nearby lighthouse building are both considered to be local landmarks that provide visual pointers to help orientate and navigate around the area.
- The Big Chill House, 259 Pentonville Road, adjacent to the site is Grade II listed.

Allocation S13

Former Thameslink station, Pentonville Road

Development and Design Principles

Development must:

1. ensure that a design-led approach is taken to delivering the optimum amount of development on the site. Where demolition is proposed, this should be justified in accordance with Policy CC2 (Retention of Existing Buildings);
2. deliver a mixed use scheme, including research and knowledge-based uses and small workshop spaces;
3. seek to include housing on site, provided it can be demonstrated to be compatible with the two nearby late night uses, the train tracks to the rear, and the busy nature of Pentonville Road. Applicants would need to clearly demonstrate that development could achieve suitable levels of amenity in terms of noise and air quality in accordance with Policy A4 (Noise) and A3 (Air Quality);
4. be designed to respect the adjacent listed building and the Scala building, as a positive contributor to the conservation area, and should respond positively to the character of St Chad's Place and Wicklow Street;
5. not have a detrimental effect on the operation of the adjoining Big Chill late night music venue and Scala music venue and snooker hall in line with the agent of change principle; and
6. provide an active frontage along Pentonville Road to improve the relationship with the street.

Infrastructure Requirements

Development must:

7. be taken forward in consultation with the relevant transport providers to establish whether there is a need to retain an entrance / exit and ticketing area for the London Underground station.

Other Considerations

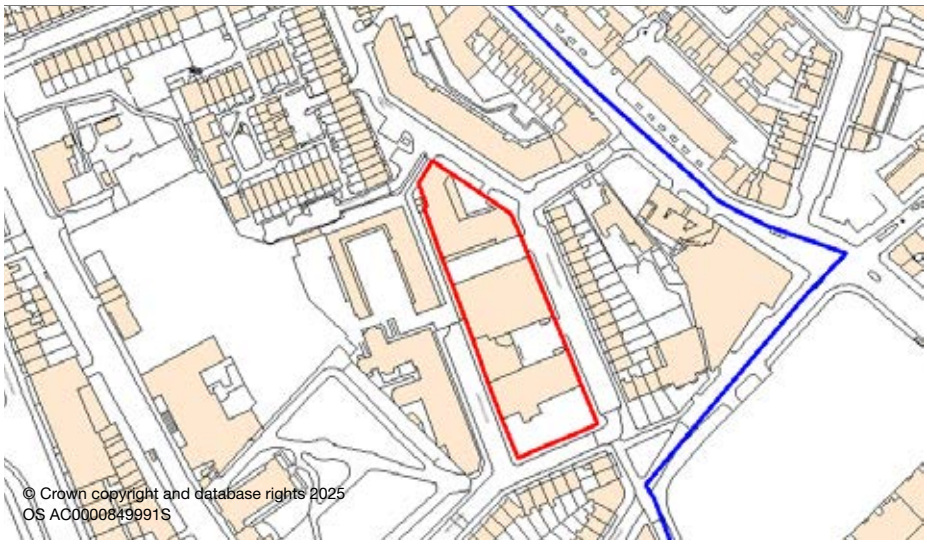
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- The site is within two viewing corridors set out in the London View Management Framework SPG.
- 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).

Allocation S14

Land at Pakenham Street and Wren Street

Key plan

Site plan



Area	0.44 hectares
Allocated Use	Education and / or employment uses (including research and knowledge-based uses, maker space and offices) and permanent self-contained homes
Indicative Housing Capacity	A contribution to the delivery of additional housing will be expected, having regard to relevant Local Plan policies including Policy H2. Capacity has been estimated at 70 additional self-contained homes, but should relate to the scale of all additional floor area proposed.
Description of Existing Site	The site is currently occupied by a number of small businesses, including printing, graphic design, video graphics, light manufacturing and offices. The wider area is heavily built-up and contains a mix of uses including offices, retail, hotels and housing. Major development is taking place opposite at the Mount Pleasant Sorting Office and to the west at the Eastman Dental Hospital site.

Context

- The site was identified in the Camden Site Allocations Plan (2013) as a potential location for a new secondary school. At the time of writing this Local Plan, the most recent pupil place projections for Camden indicate that there is no current need for a new secondary school at this location. Pupil place projections figures will, however, be kept under review.
- The Bloomsbury Conservation Area is immediately to the south and east of the site. 23 – 24 Pakenham Street, 21 Wren Street and the boundary wall are locally listed and considered to be of architectural, historical and townscape significance.

Allocation S14

Land at Pakenham Street and Wren Street

Development and Design Principles

Development must:

1. consider local educational needs and make provision for educational uses if required. If education floorspace is not required at the time of submission, or anticipated in the future, the intensification of employment floorspace would be supported, in addition to the provision of self-contained homes;
2. be informed by a robust understanding of the historic context of the site and the merits of its existing buildings, including 23 – 24 Pakenham Street, 21 Wren Street and the boundary wall;
3. respond to the architectural quality of the adjacent historic terraces on Wren Street and Pakenham Street; and
4. be designed to introduce east-west permeability for pedestrians and cyclists and link into other routes and spaces being created through development happening to the west.

Infrastructure Requirements

Development must:

5. contribute to the improvement of pedestrian and cycle routes and the public realm around the site.

Other Considerations

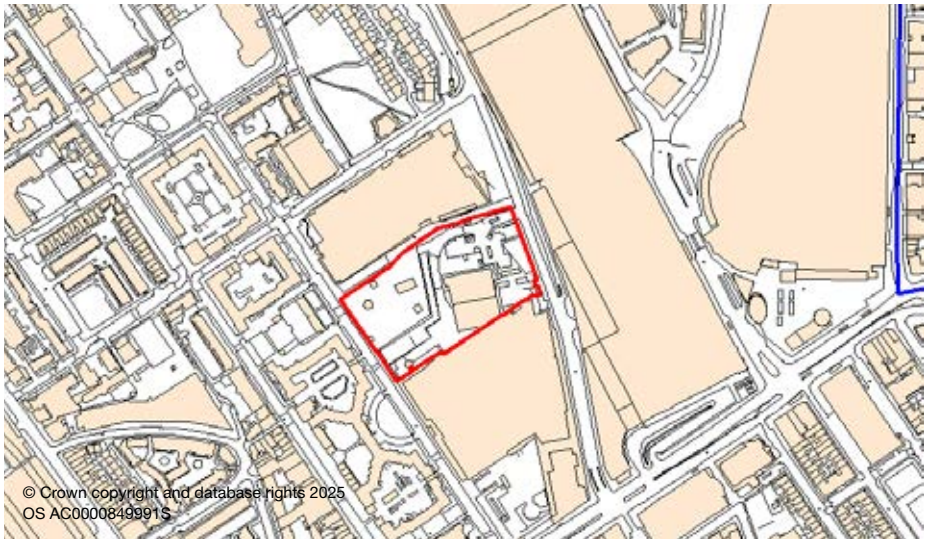
- The indicative housing capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- Proposals involving substantial demolition will be required 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).
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within the Secondary A Aquifer. Should foundation works extend more than 20m below the ground surface, there is a risk that foundations will extend through the London Clay and effect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
- The site is within a viewing corridor set out in the London View Management Framework SPG.

Allocation S15

Land to the rear of the British Library

Key plan

Site plan



Area	1.42 hectares
Allocated Use	Cultural, research and knowledge-based uses and permanent self-contained homes
Indicative Housing Capacity	A contribution to the delivery of housing will be expected having regard to relevant Local Plan policies including Policy H2.
Description of Existing Site	The British Library is the national library of the United Kingdom, used by over 1.5 million people each year, and gives access to the world's most comprehensive research collection. The site is located to the rear of the Library, adjacent to the Francis Crick Institute and close to central Somers Town and King's Cross central. Part of the site is occupied by the British Library Conservation Centre. The Centre houses state-of-the-art book conservation studios and sound preservation studios, together with facilities for an extensive training and public outreach programme. The main Library is Grade I listed, and the Library Centre for Conservation is a non-designated heritage asset.

Context

- The Council has granted planning permission and listed building consent (2022/1041/P, 2022/1320/L) for a new building for use as a library, galleries, learning, business and events space, and retail and commercial spaces.
- If the permissions are not implemented, the Council will support a mixed use development that complements and supports the expansion plans and future service needs of the British Library, including cultural, commercial and community uses and, in particular, uses related to the knowledge and innovation economy.
- The proposed nature and balance of acceptable uses and the extent of any housing requirements on-site (or alternatively off-site) will be considered in the light of competing land use needs, other priorities and relevant policy criteria, including the extent to which proposals are publicly funded and support the investment plans and operational needs of the British Library.
- The site lies within the area safeguarded for Crossrail 2 purposes and is an area of surface interest.

Allocation S15

Land to the rear of the British Library

Development and Design Principles

Development must:

1. be designed to be welcoming, outward-facing, accessible and inclusive;
2. ensure that the main entrance to the public library facilities is visible from the St Pancras Station entrance on Midland Road. An additional entrance from Ossulston Street should also be provided, to support links to, and public access from, communities on all sides of the site;
3. be of exceptional design quality reflecting the site's important location and historic context. Appropriate consideration should be given to the impact of development on existing buildings on the site and any adverse impacts on the Grade I listed British Library should be avoided;
4. explore opportunities to provide a community hub, and a learning, employment or resource centre for the Knowledge Quarter;
5. maximise opportunities for integrating green infrastructure, including new tree planting, into the fabric of the development. A range of public open spaces should be provided on-site that are designed to be inclusive and easily accessible to all. Consideration should also be given to how roof spaces can support this role and provide a public asset;
6. deliver a range of community benefits, for example by including flexible community space/s that could be used for meetings, social enterprise, informal training and learning, pop-up cafes/shops and exhibitions; and
7. provide new routes and spaces through the site, to ensure it is integrated into the local area.

Infrastructure Requirements

Development must:

8. ensure that Crossrail 2 infrastructure is incorporated into the overall design in a manner which responds positively to the public realm;
9. demonstrate to the Council's satisfaction that it:
   a. would be compatible with the location of Crossrail 2 structures (tunnels, shafts and temporary works) proposed in the vicinity of the development;
   b. can accommodate any potential ground movements anticipated to arise from construction works;
   c. mitigates against any potential effects of the operation of Crossrail 2; and
10. ensure the landscaping across the site enhances the east - west connection and links to Dangoor Walk.

Other Considerations

- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk).
- 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).

Allocation S16

Former Central St Martins College

Key plan

Site plan

Address	Lethaby Building and Cochrane Theatre, 12-42 Southampton Row, 1-4 Red Lion Square, Holborn, WH1B 4AF
Area	0.45 hectares
Allocated Use	Permanent self-contained homes and student accommodation, hotel, cultural, retail, creative workspace
Indicative Housing Capacity	A contribution to delivery of housing will be expected, having regard to relevant Local Plan policies including Policy H2. This has been assessed as 34 additional self-contained homes in the context of the development permitted, but should relate to the scale of all additional floor area (GIA) proposed.
Description of Existing Site	The former Central St Martins College (University of the Arts) is an island site surrounded by Southampton Row to the west; Procter Street, Drake Street, and Red Lion Square to the east; Theobald's Road to the north; and Fisher Street to the south. The Lethaby Building was built as the Central School of Arts and Crafts and is Grade II* listed. The Cochrane Theatre was operational till 2012, when Central St Martins College relocated. The site has been partially occupied by meanwhile uses since the college left.

Context

- Planning permission (2020/2470/P) and listed building consent has been granted for a hotel, self-contained homes, maker space and cultural and retail uses.
- The western part of the site is located within the Kingsway Conservation Area and the eastern part of the site sits opposite the Bloomsbury Conservation Area.
- The Council has prepared the 'Holborn Vision' which is intended to guide development and investment in the Holborn area and developers will be expected to have due regard to this.

Allocation S16

Former Central St Martins College

Development and Design Principles

Development must:

1. deliver a mixed use scheme including permanent self-contained housing;
2. optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply). Where student accommodation is proposed it should be in accordance with Policy H9 (Purpose-built Student Accommodation);
3. retain the Grade II* listed Lethaby Building, ensuring that its fabric and setting are protected and, where appropriate, enhanced to better reveal its heritage significance, and establish an appropriate and viable use to ensure the building's long-term future;
4. provide an on-site cultural use, including gallery, exhibition space or other publicly available cultural space;
5. ensure any new buildings, and extensions to existing buildings, are of exceptional architectural quality to respond to the site's sensitive and varied context and range of interfaces, particularly Red Lion Square and the Lethaby Building;
6. ensure the height of any proposal is sensitive to the surrounding townscape, conservation areas and listed buildings, in particular the Lethaby building. Any additional height, scale or massing to the current building on Red Lion Square would need to be sufficiently justified and articulated;
7. create a new public pedestrian route to conform to the historic alignment of the street that led diagonally north-westwards from Red Lion Square, to improve permeability and create a link between Southampton Row and Red Lion Square;
8. provide active ground floor uses, including retail, or front doors and windows that help to enliven the street, in particular on Procter, Street, Drake Street and Theobalds Road, and other streets where possible; and
9. consider making provision for independent retailers and retail serving the local community.

Infrastructure Requirements

Development must:

10. contribute to the public realm improvements planned on all sides of the site, including those to be delivered through the Holborn Liveable Neighbourhood Scheme.

Other Considerations

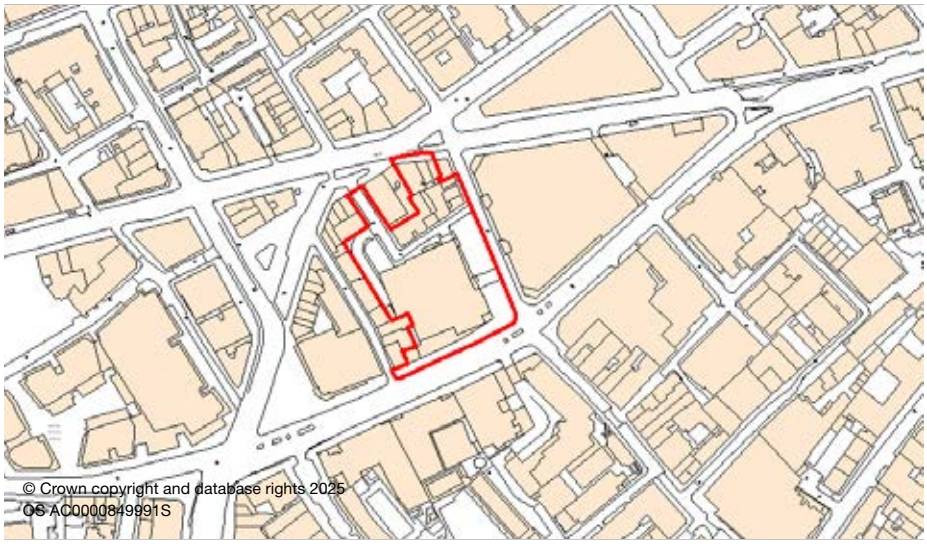
- The Council has granted planning permission for a development up to 50m. That decision was based on an assessment of the impacts and benefits of that specific development and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.
- 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.
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
- 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).

Allocation S17

Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street

Key plan

Site plan



Address	Selkirk House, 166 High Holborn, 1 Museum Street, 10 – 12 Museum Street, 35 – 41 New Oxford Street and 16a-18 West Central Street, WC1A 1LY
Area	0.45 hectares
Allocated Use	Mixed use including offices, research and knowledge-based uses, town centre uses, and permanent self-contained homes
Indicative Housing Capacity	A contribution to the delivery of housing will be expected having regard to relevant Local Plan policies including Policy H2. This has been assessed as 12 additional self-contained homes in the context of the development permitted, but should relate to the scale of all additional floor area proposed
Description of Existing Site	The site comprises a number of elements, including a Travelodge hotel and multi storey car park, 10 – 12 Museum Street, 35, 37 and 39 – 41 New Oxford Street, and 16A, 16B and 18 West Central Street. Previous uses of the site include retail use, a nightclub (ceased operation in 2011), offices, 31 homes and a house in multiple occupation (approximately 1900 sqm of residential floorspace) at upper floor levels. Part of the site on West Central Street is vacant.

Allocation S17

Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street

Context

- Planning permission (2023/2510/P) and listed building consent have been granted for a mixed use scheme including offices, town centre uses, and self-contained homes.
- 10-12 Museum Street and 35 and 37 New Oxford Street are Grade II listed buildings, as are several properties adjoining the site. These listed buildings are also within the Bloomsbury Conservation Area. The buildings on the remainder of site are outside the Conservation Area, but the conservation area appraisal notes that their scale and design harm the settings of nearby listed buildings and the conservation area.
- 39-41 New Oxford Street was granted a Certificate of Immunity until 19 October 2028 by Historic England, preventing it from being statutorily listed.
- Buildings within the northern part of the site are allocated in the Camden Site Allocations Plan 2013 (site 18) for mixed use development through conversion, extension or partial redevelopment.
- The site is within the Tottenham Court Road Growth Area, designated in the London Plan.
- The Council has prepared the 'Holborn Vision' which is intended to guide development and investment in the Holborn area, and developers will be expected to have due regard to this.

Development and Design Principles

Development must:

1. be designed to respond to the site's varied context, taking into account the listed buildings, the setting of heritage assets, and views to and from Bloomsbury Conservation Area;
2. seek to maximise the delivery of additional residential floorspace, in addition to reproviding the existing residential floorspace;
3. provide active ground floor uses, including retail, or front doors and windows to create lively and well-overlooked streets on Museum Street, West Central Street and High Holborn;
4. explore options for providing a safe and welcoming public route through the site on the axis with Coptic Street to create a new route to and from the British Museum. Active ground floor uses, including shops and restaurants, should be provided along the route to promote natural surveillance;
5. remove existing on-site car parking, in line with the car free approach set out in Policy T5 (Parking); and
6. maximise opportunities for the provision of high-quality urban greening and new street trees, in particular along the wide pavement on Museum Street.

The Camden Building Heights Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 54m considered the potentially appropriate height range. The Council has granted planning permission for a development of up to 74m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings), other relevant development plan policies and the London View Management Framework.

Allocation S17

Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street

Infrastructure Requirements

Development must:

7. contribute to the delivery of the significant public realm improvements planned for the area, as part of the Holborn Liveable Neighbourhood project. This should include the provision of improved public space on Museum Street.

Other Considerations

- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.
- This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
- The site is within a protected background view, as set out in the Mayor's London View Management Framework SPG.
- 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).

Allocation S18

135 – 149 Shaftesbury Avenue

Key plan

Site plan

Area	0.08 hectares
Allocated Use	Theatre / cinema, cultural use
Indicative Housing Capacity	A contribution to the delivery of housing off-site will be expected having regard to relevant Local Plan policies, including Policy H2.
Description of Existing Site	The building at 135-149 Shaftesbury Avenue is Grade II listed and sits between Shaftesbury Avenue, St Giles Passage, New Compton Street and Stacey Street. The Phoenix Community Garden lies to the rear of the site. The building opened in 1931 as the Saville Theatre and was converted to a cinema in 1970. The building was previously used as an Odeon Cinema.

Context

- The site adjoins the Seven Dials (Covent Garden) Conservation Area, which covers the south side of Shaftesbury Avenue, and the Denmark Street Conservation Area, which covers the north side of New Compton Street.
- Planning permission (2017/7051/P) and Listed Building consent (2018/0037/L) for an extension to allow a mixed use development of a hotel, cinema, spa and restaurant uses were refused and subsequently dismissed at appeal in March 2021.
- The supply of sites that could accommodate a large-scale cultural venue, such as a theatre, is very limited in the West End and there is continued demand by theatre operators for such venues.

Allocation S18

135 – 149 Shaftesbury Avenue

Development and Design Principles

Development must:

1. retain the Grade II listed building and ensure that its fabric and setting are protected and, where appropriate, enhanced, particularly the building's distinctive features. A full assessment of the remaining internal historic fabric of the building should be undertaken prior to the submission of a planning application;
2. retain the cinema / theatre use and ensure that any other uses introduced on the site do not compromise, or restrict the viability, or operation, of the cinema / theatre use;
3. ensure that the cinema / theatre function is integrated into the building's design and layout, including careful consideration of the location, size and relationship of the screening rooms / stage, to circulation and other public spaces;
4. only consider alternative public cultural uses if it can be demonstrated to the Council's satisfaction that a cinema or theatre operator cannot be identified;
5. retain the main, front entrance for the cinema/ theatre use, and use side or rear entrances for any secondary uses;
6. ensure that where an upward extension is proposed, this is of the highest architectural quality to complement and enhance the Grade II listed host building, is of a height and massing that is appropriate to the site's surrounding townscape, and responds to the neighbouring conservation areas; and
7. explore options for activating the blank façades facing St Giles Passage, New Compton Street and Stacey Street. Measures could include windows, entrances and active ground floor uses that help to enliven the street.

Infrastructure Requirements

Development must:

8. contribute to improvements in the public realm around the building to create better-lit routes and encourage activity around the building;
9. contribute to the delivery of the Shaftesbury Avenue Safe and Healthy Street Scheme; and
10. work with the local community to protect and enhance the setting of Phoenix Gardens.

Other Considerations

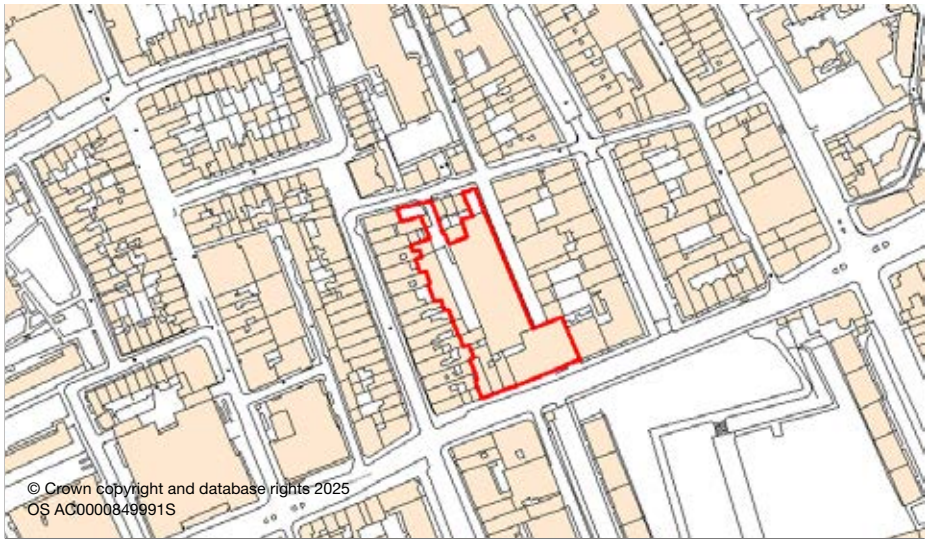
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
- 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.

Allocation S19

Cockpit Yard and Holborn Library

Key plan

Site plan



Area	0.4 ha
Allocated Use	Employment (including creative and maker spaces and affordable workspace), permanent self-contained homes, library and depot
Indicative Housing Capacity	A contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2. This has been assessed as 73 additional self-contained homes, but should relate to the scale of all additional floor area (GIA) proposed
Description of Existing Site	The site contains several buildings including Holborn Library, ground floor retail (40-46 Theobalds Road), a Council street cleaning depot, and workshops occupied by the Cockpits Arts organisation. The site is bounded by Theobalds Road to the south, Northington Street to the north and John's Mews to the east. The west boundary of the site abuts the rear of the properties fronting Great James Street.

Context

- The site is within the Bloomsbury Conservation Area. A number of the buildings - including the Assembly Hall, Council depot/garages, Holborn Library 32-38 (even) and 40 – 44 Theobalds Road - are identified as positive contributors to the character of the conservation area.
- Adjoining the site to the west are Grade II* listed buildings at 3-16 Great James Street.
- Cockpit Arts have provided creative workspace and maker space at this site for over 30 years and the site is a centre of excellence for contemporary craft. Continued operation of this use is supported.
- The Council has prepared the 'Holborn Vision' which is intended to guide development and investment in the Holborn area and developers will be expected to have due regard to this.

Allocation S19

Cockpit Yard and Holborn Library

Development and Design Principles

Development must:

1. retain or reprovide the library and archive, and Council depot functions;
2. retain or reprovide the specialist and affordable creative and maker spaces in accordance with Policy IE4 (Affordable Workspace);
3. provide flexible space suitable for a range of additional employment uses;
4. optimise the provision of additional homes having regard to relevant Local Plan policies, including Policy H2, and the scale of additional floor area (GIA) proposed;
5. be designed to allow the co-location of housing and other proposed uses, ensuring that non-employment uses do not compromise the operation of existing or future employment uses;
6. be designed to respond to the site's varied context, taking into account heritage assets and the surrounding townscape, to ensure that development does not negatively impact on the Bloomsbury Conservation Area, or the listed buildings adjacent to the site; and
7. be designed to maintain an active ground floor frontage onto Theobald's Road.

Infrastructure Requirements

Development must:

8. contribute to the public realm improvements planned for the area, which will be delivered as part of the Holborn Liveable Neighbourhood project.

Other Considerations

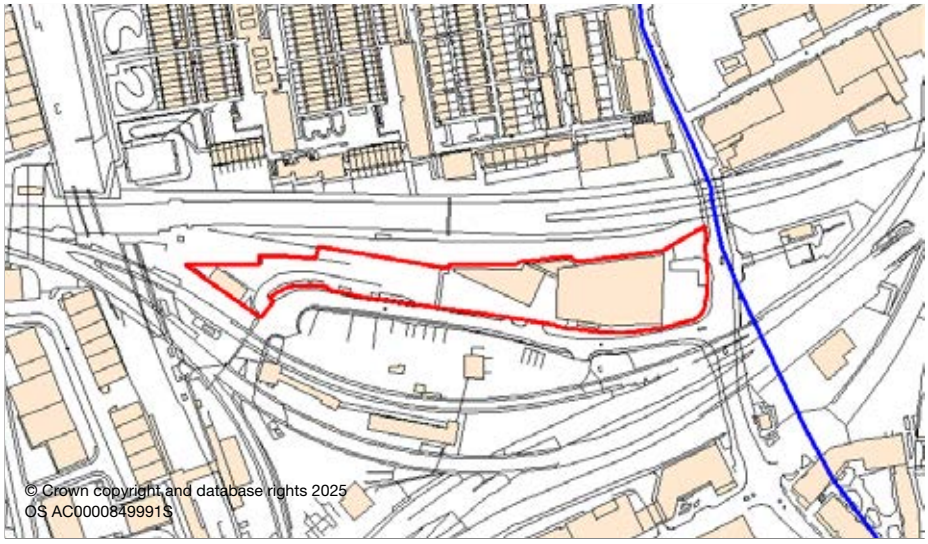
- The indicative housing capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- Proposals involving substantial demolition will be required 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).
- The site is located within several protected views identified in the London View Management Framework.
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
- 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.

Allocation S20

York Way Depot and adjacent land at Freight Lane

Key plan

Site plan



Area	1.05 hectares
Allocated Use	Permanent self-contained homes, employment (including offices), depot and bus operation s/ parking facility and accommodation for gypsies and travellers
Indicative Housing Capacity	210 additional homes
Description of Existing Site	The site includes a Council depot with offices, sui generis depot facilities (primarily vehicle parking and maintenance), and largely open land, which was last used for bus parking with ancillary staff facilities. It is bordered to the north by railway lines, by York Way to the east, and a concrete plant to the south, which is a safeguarded aggregate site.

Context

- The site is part of former railway lands redeveloped under the Channel Tunnel Rail Link (CTRL) project and related 1996 Act.

Allocation S20

York Way Depot and adjacent land at Freight Lane

Development and Design Principles

Development must:

1. intensify the employment floorspace on the site, with no net loss;
2. optimise the use of the site through efficient design, to enable the co-location of housing, employment, gypsy and traveller accommodation and other proposed uses, whilst ensuring that the introduction of non-employment uses does not compromise the operation of employment uses;
3. optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area proposed;
4. provide accommodation for gypsies and travellers in accordance with H11 (Accommodation for Travellers);
5. ensure that the intensification of employment uses provides high-quality, modern, flexible employment spaces, and significantly in creases the number of jobs on the site. The provision of affordable workspace will also be expected;
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 in accordance with the Agent of Change principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity);
7. create a more active and engaging street frontage addressing York Way;
8. provide substantial new, welcoming, accessible and safe open space and public areas;
9. seek to improve conditions for pedestrians and cyclists along Freight Lane;
10. enhance the biodiversity corridors along the railway lines to the north and northwest of the site (which are a designated Grade I Site of Important Nature Conservation), in order to support biodiversity and create and improve connections for wildlife;
11. ensure that proposals for the redevelopment of this site appropriately consider their impact on the railway and its operations; and
12. be designed and located so as not to prejudice the continued operation of the aggregates transshipment facility which straddles the railway immediately south of this site.

The Camden Building Height Study identified this site as a location where tall buildings may be an appropriate form of development, with 15m – 56m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

Allocation S20

York Way Depot and adjacent land at Freight Lane

Infrastructure Requirements

Development must:

13. retain or reprovide the Council Depot service provision, as necessary, unless suitable compensatory sites are provided elsewhere that replace the existing service provision. The continuous availability of services must be maintained in all circumstances;
14. protect bus depot capacity as necessary; and
15. contribute towards the delivery of the Camden High Line.

Other Considerations

- Part of the site is within two viewing corridors set out in the London View Management Framework SPG.
- 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).
- 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.
- This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.

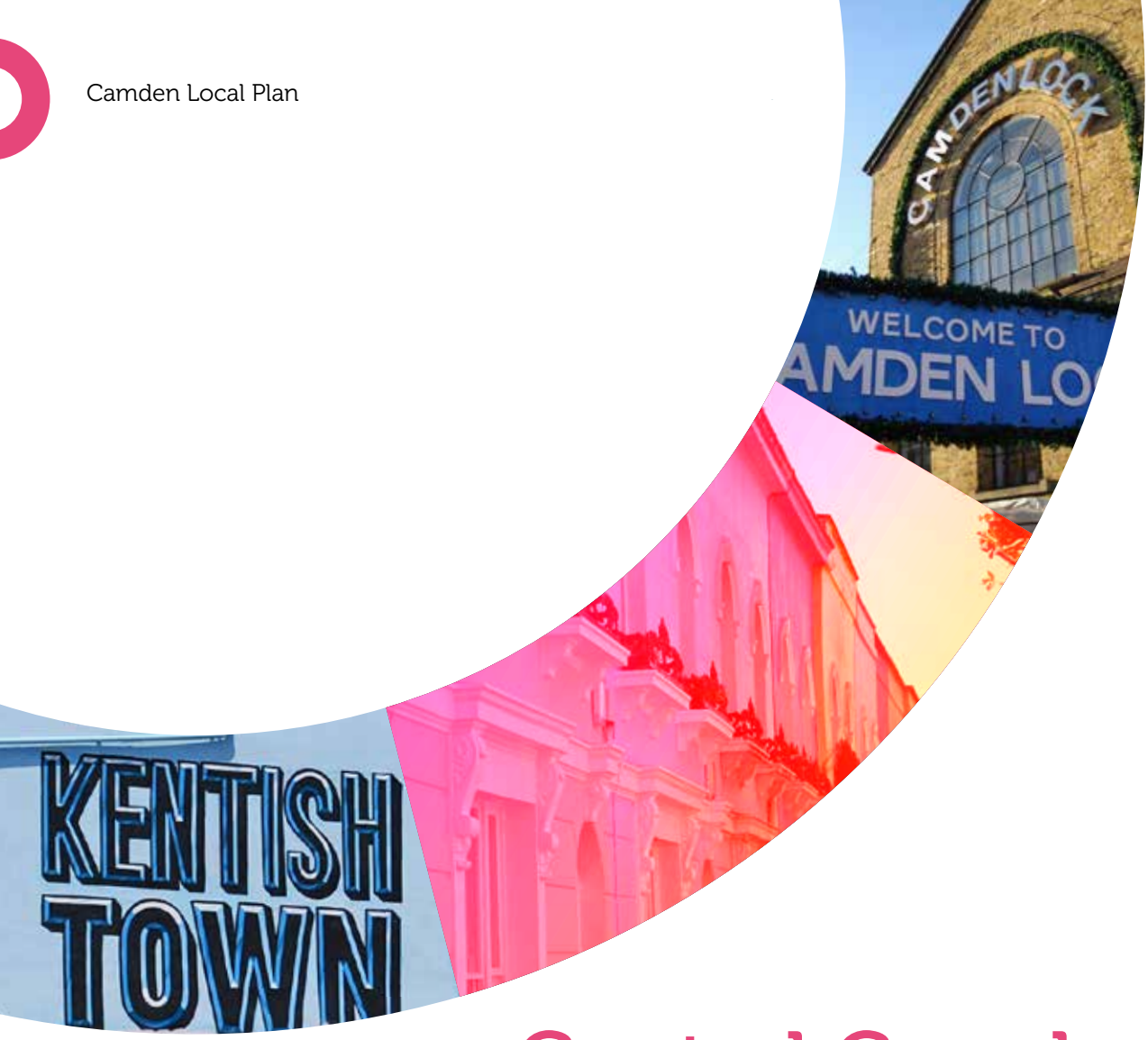
3.38 The following table identifies further site allocations in the south of the borough, all of which are subject to planning permission, and sets out key considerations for each site.

Table 3 | Further site allocations in South Camden

Site Reference	Address	Allocated uses	Indicative Housing Capacity	Key Considerations
S21	Agar Grove Estate	Permanent self-contained homes	139	Planning permissions 2013/8088/P, 2019/4280/P and 2022/2359/P granted permission for an uplift of 247 homes on the estate. The final homes are now under construction (with earlier phases complete).
S22	6 St Pancras Way	Permanent self-contained homes, employment, retail, and leisure	73	Planning permission 2021/2671/P as amended by 2023/5041/P has been implemented and is under construction.
S23	Tybalds Estate (infill)	Permanent self-contained homes	56	Planning permission 2021/3580/P has been implemented and is under construction.
S24	294 – 295 High Holborn	Permanent self-contained homes and employment	10	Planning permission 2017/1827/P 2 has been implemented and initial works commenced.
S25	156 – 164 Gray's Inn Road	Permanent self-contained homes and employment	14	Planning permission 2015/6955/P (as amended by 2020/1368/P, 2021/1919/P and 2021/1056/P) has been implemented and is under construction.
S26	8 – 10 Southampton Row	Permanent self-contained homes and hotel	9	Planning permission 2019/2536/P has been granted.
S27	Middlesex Hospital Annex 44 Cleveland Street	Permanent self-contained homes and health uses	57	Planning permission 2017/0414/P has been implemented and is under construction.
S28	Central Somers Town	Permanent self-contained homes and community uses	38	Planning permission 2015/2704/P (as amended) approved 150 homes. This site is currently under construction.
S29	Chalton Street, Godwin and Crowndale estate	Permanent self-contained homes and health uses	10	Planning permission 2020/3801/P has been granted.
S30	Birkbeck College, Malet Street	Permanent self-contained homes	0	Higher education (academic and ancillary space) should be provided in accordance with Policy S4 (Bloomsbury Campus Area). This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
S31	Senate House, (NE quadrant) Malet Street	Higher education (academic and ancillary space)	0	Higher education (academic and ancillary space) should be provided in accordance with Policy S4 (Bloomsbury Campus Area). This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
S32	20 Russell Square	Higher education (academic and ancillary space)	0	Higher education (academic and ancillary space) should be provided in accordance with Policy S4 (Bloomsbury Campus Area). This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.

04

Central Camden



04
Chapter

Central Camden

4.1 The Central area of the borough includes the neighbourhoods of Gospel Oak, Haverstock, Kentish Town, Belsize Park, Primrose Hill and Camden Town.

4.2 The area is predominantly residential, with each neighbourhood having its own identity and distinct characteristics; from the Victorian villas and leafy streets of Primrose Hill and Belsize Park to the post-war housing estates in Gospel Oak and Haverstock, the Victorian terraces and clusters of industrial uses in Kentish Town, and the pockets of more modern development in Chalk Farm and Camden Town.

4.3 Large parts of this area are designated as conservation areas and there are a number of listed and locally listed buildings.

Figure 11:

Central Camden

Key

- Neighbourhood Centres
- Town Centres
- Industry Area
- Regents Canal
- Open Spaces
- Conservation Area
- Railway Station
- Tube Station

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4.4 The area contains two town centres at Camden Town and Kentish Town, in addition to several neighbourhood centres. These form a focal point within these areas and are central to their individual identities. Camden Town is the largest town centre in the borough. It is internationally renowned as a tourist destination, famous for its markets, independent retailers and music and entertainment venues. The centre also has a particularly strong leisure offer including restaurants, cafés, bars and clubs, which make Camden Town a distinctive daytime and evening visitor destination. Kentish Town town centre predominantly provides day-to-day shopping and facilities serving local needs.

4.5 Camden Town is an important secondary office market within the borough and has a strong representation of creative businesses. Kentish Town is also an attractive location for creatives. There are significant clusters of industrial land in Kentish Town. The Murphy site and the concentration of small and medium sized enterprises located within premises close to the Highgate Road form part of the designated Industry Area, and Regis Road is a non-designated industrial site.

4.6 The area has good public transport connections, with five rail stations (Gospel Oak Overground, Hampstead Heath Overground, Kentish Town Thameslink, Kentish Town West Overground and Camden Road Overground); five underground stations (Kentish Town, Belsize Park, Mornington Crescent, Camden Town and Chalk Farm); and several local bus routes.

4.7 The central area of the borough is well served by community facilities, with Council libraries in Camden Town, Kentish Town and Queen's Crescent; community libraries in Primrose Hill and Belsize; two leisure centres in Kentish Town (the Talacre Community Sports Centre and Kentish Town Sports Centre); and a number of community centres.

4.8 Most of the central area of the borough is well served by public open space. The largest area of open space in this part of Camden is Primrose Hill, which offers panoramic views across the centre of London. Other public open spaces include: Talacre, Lismore Circus, Montpelier Gardens, Gospel Oak Open Space, Hawley Street Open Space, Cantelowes Gardens and Camden Square Gardens. In addition to this, there are ten Sites of Importance for Nature Conservation (SINCs) in this area, which contribute to the borough's biodiversity and provide a focus for nature conservation activities.

4.9 A key feature of the central area of the borough is the Regent's Canal. The Canal is Camden's only significant open watercourse and winds through the borough from Regent's Park to King's Cross. It is an important historical feature and a designated conservation area. It is also designated as a Site of Metropolitan Importance for Nature Conservation and there is considerable scope for environmental improvements to enhance biodiversity along its course.

4.10 The centre of the borough has one adopted Neighbourhood Plan: the Kentish Town Neighbourhood Plan, which sets out the community's aspirations and planning policies for that area. The Neighbourhood Plan is part of the Council's statutory development plan and is considered, alongside our own policies, when we make decisions on planning applications in that area.

4.11 A number of opportunities exist in this area to deliver new homes, jobs and infrastructure to support Camden's communities, the most significant being on the sites at Regis Road and Murphy's in Kentish Town, where there is opportunity for intensification and diversification to create a vibrant new neighbourhood, while ensuring the continued provision of industry, logistics and employment uses at a higher density and in a way that makes the most effective and efficient use of the land available. Further development is planned in the Camden Goods Yard area on the edge of Camden Town and through the Council's Community Investment Programme at West Kentish Town and the Wendling and St Stephen's Close estates. The policy below sets out the Council's strategy for the central area of the borough to guide the future development of this area. Information on key infrastructure programmes and projects in the West of the borough are set out separately in the Council's Infrastructure Delivery Plan.

Figure 12:

Key areas of development in Central Camden

Key

Key Areas of Development	Open Spaces
CIP Regeneration Schemes	Town Centres
Industry Area	Railway Station
Regents Canal	Tube Station

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Policy C1
Central Camden

A. Development coming forward in this area should have a positive identity, drawing on the area's rich heritage and Camden's distinctive cultural energy, community and creative spirit; and deliver substantial benefit to Camden's communities, the local area and the borough as a whole, in accordance with the Local Plan and, where relevant, the Kentish Town Neighbourhood Plan.

New homes

B. Sites have been allocated in the central area of the borough to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocation policies set out below.

C. The greatest concentration of development in Central Camden will be in the areas of Kentish Town, Camden Town, Gospel Oak and Haverstock.

D. Development in Kentish Town will mainly be delivered through site allocations at Regis Road and the Murphy site, which are expected to deliver approximately 1,750 new homes. These employment sites will be intensified to deliver a new neighbourhood that provides a mix of uses, including employment uses; significant provision of permanent self-contained homes; community facilities; cultural and leisure uses; and open space, creating an exemplar sustainable, employment-led mixed-use area that is fully connected to, and integrated into, surrounding communities. To deliver the Council's and community's visions and objectives for this area, we will expect development to be taken forward in accordance with the Kentish Town Planning Framework and the Kentish Town Neighbourhood Plan.

E. Development in Camden Town will mainly be delivered through site allocations in the Camden Goods Yard area, which are expected to deliver approximately 1,200 new homes. This area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes and provide a range of retail and employment spaces. To deliver the Council's vision and objectives for this area, the Council will expect development coming forward in this location to be taken forward in accordance with the Camden Goods Yard Planning Framework.

Policy C1
Central Camden

F. The Council is committed to a programme of estate renewal and regeneration delivered through its Community Investment Programme (CIP). The main focus of this work in the central area of the borough is the West Kentish Town and Wendling and St Stephen's Close estates. To deliver the community's priorities for this area, the Council will expect development to be taken forward in accordance with the Community Vision for Gospel Oak and Haverstock. Development in the central area of the borough will be required to support the Council's estates mission set out in We Make Camden and assist with the delivery of the Council's priorities for nearby housing estates.

G. Where sites in this area that are not allocated come forward for housing development, these will be determined in accordance with the policies in this Plan.

Employment and the Economy

H. New employment floorspace will be delivered in the central area of the borough through site allocations, existing planning permissions and the development of other sites.

I. A diverse range of employment uses are expected to be provided as part of the redevelopment of the Camden Goods Yard area to build on the innovative and creative economy of Camden Town. This should include the provision of affordable workspace, light industrial workshops, small units for start-ups and move-on space so that businesses can remain in the area and grow.

J. On the Regis Road and Murphy sites in Kentish Town, development will be expected to include higher density provision of industry, logistics and other employment uses, providing space for, and a significant increase in, jobs in identified growth sectors, including creative industries which have a strong presence in the area, small and medium enterprises, start-ups, and businesses supporting London's Central Activity Zone (CAZ) and the local economy.

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).

Policy C1
Central Camden

Retail and Town Centres

L. The majority of new retail development in the central area of the borough is expected to be delivered through development in the Camden Goods Yard area.

M. The Council will continue to support and protect the town centres of Camden Town and Kentish Town, and the Neighbourhood Centres in the Central area of the borough, to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors in line with the retail policies in the Plan, with any additional shopping and leisure uses to be provided in accordance with Policy IE6 (Supporting Designated Centres and Essential Services).

N. The Council will support efforts to widen the range of evening and night-time economy uses in Camden Town, particularly where this will benefit local residents and people working night shifts, in line with the objectives set out in the Council's Evening and Night-time Economy Strategy.

Infrastructure

O. To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure from appropriate development. The Council will work with relevant providers to secure the infrastructure needed to support development and provide the facilities needed for the area's communities. Key priorities for the central area of the borough include:

1. the delivery of step-free access at Kentish Town Underground and Thameslink Stations; Camden Town Underground Station; and Chalk Farm Underground Station;
2. capacity upgrades at Camden Town Underground Station;
3. the upgrade of the north London Line, to reinstate four tracks and deliver a third platform at Camden Road overground station from 2030, to meet future passenger and freight demand;
4. the Camden Highline, an elevated walkway between Camden Town and King's Cross;
5. the delivery of a new eastern access and public realm improvements at Gospel Oak Overground Station;
6. the delivery of Stephenson's Walk, a new walking, cycling and wheeling route adjacent to the West Coast Main Line railway that will connect Regent's Park Road Bridge with the Regent's Canal towpath;
7. the creation of attractive and safer pedestrian and cycling routes both into and through the area to deliver the priorities set out in the Council's Transport Strategy and Cycling Action Plan;

Policy C1
Central Camden

8. public realm improvements in Kentish Town and Camden Town Town Centres and Queen's Crescent Neighbourhood Centre;
9. the roll-out of the Council's neighbourhood-based Safe and Healthy Streets schemes, including reductions in through-traffic;
10. the pedestrianisation of the section of Camden High Street between Camden Town Underground station and Hawley Crescent/Jamestown Road;
11. the remodelling of Talacre Community Sports Centre to increase capacity and quality of activity spaces and upgrades to the public realm between the Town Green and the Sports Centre;
12. the development of a community space at 2 Prince of Wales Road;
13. the provision of new community facilities at Queen's Crescent Neighbourhood Centre to enhance and reinforce its role within the community;
14. the delivery of an Integrated Care Hub;
15. the delivery of new social infrastructure, including public toilets, and cultural uses, as part of the development of the Camden Goods Yard area and the Regis Road and Murphy sites;
16. the provision of facilities for young people in Camden Town and the Gospel Oak and Haverstock area, including new, and/or improved sport and leisure facilities;
17. delivering new and enhanced areas of public open space and play space, and improving access to nature, in Kentish Town, Camden Town and Gospel Oak and Haverstock, in line with Policy SC4 (Open Space);
18. the delivery of the Heath Line, a new green connection between Hampstead Heath and Kentish Town;
19. the delivery of the Camden Nature Corridor, which aims to deliver a nature-rich green corridor from Hampstead Heath into Kentish Town through improvements to a chain of five Sites of Interest for Nature Conservation (SINCs) and their connection through green infrastructure established across future development on site allocations at Murphy's Yard, Regis Road and West Kentish Town Estate;
20. the delivery of flood mitigation measures and sustainable drainage schemes;
21. the delivery of the Camden Green Network stretching from the Thames to Hampstead Heath;
22. greening and biodiversity enhancements; and
23. the provision of infrastructure for supporting local energy generation.

Site allocations

4.12 A number of site allocations are designated in the central area of the borough, and these are identified on the map below and listed in Table 4.

Figure 13:
Site Allocations in Central Camden

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Table 4 | Site allocations in Central Camden

Site Reference	Previous Site Reference*	Site Name
C2	C2	Regis Road and Holmes Road Depot
C3	C3	Murphy Site
C4	C4	Kentish Town Police Station
C5	C5	369-377 Kentish Town Road
C6	C6	Kentish Town Fire Station
C7	C7	Morrisons Supermarket
C8	C8	Former Morrisons Petrol Filling Station
C9	C9	100 Chalk Farm Road
C10	C10	Juniper Crescent
C11	C11	Network Rail land at Juniper Crescent
C12	C12	Gilbeys Yard
C13	C13	West Kentish Town Estate
C14	N/A	Hawkridge House
C15	C14	Wendling Estate and St Stephens Close
C16	C15	Shirley House
C17	C16	Camden Town over-station development
C18	C17	UCL Campus, 109 Camden Road
C19	C18	Arlington Road former depot site
C20	C19	Highgate Centre, Highgate Road
C21	C20	Grand Union House, 18-20 Kentish Town Road
C22	C21	Heybridge Garages, Hadley Street
C23	C22	Former flats 121 – 129 Bacton, Haverstock Road
C24	C24	52 – 54 Avenue Road
C25	C25	5-17 Haverstock Hill (Eton Garage)
C26	N/A	160 Malden Road
C27	N/A	Land adjacent to Constable House, Adelaide Road

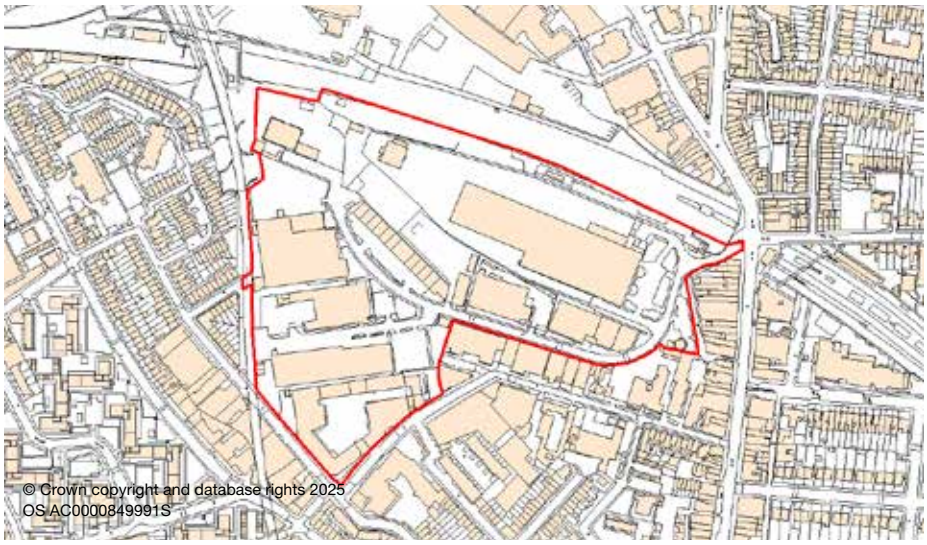
*Previous policy reference in the draft Local Plan 2024

Allocation C2

Regis Road and Holmes Road depot

Key plan

Site plan



Address	Regis Road, Holmes Road Depot
Area	9 hectares
Allocated Use	Industry / employment (including offices), permanent self-contained homes, community uses; open space; waste and recycling facilities; and depot facilities
Indicative Housing Capacity	1,000 additional self-contained homes
Description of Existing Site	The Regis Road site is currently occupied by industrial premises, which house logistics, manufacturing and other businesses. It also includes the Council's Recycling and Reuse Centre and car pound. Many buildings on the site are single storey sheds surrounded by areas of yard space and parking. The Holmes Road Depot site contains a Council depot and offices, and 25 homes (including 20 affordable homes). The site is bordered to the north and west by railway lines, to the south by the rear of properties on Holmes Road, and to the east by York Mews, which lies behind Kentish Town Road. Currently the junction with Kentish Town Road is the only way in and out of Regis Road, which is largely cut off from surrounding areas.

Allocation C2

Regis Road and Holmes Road depot

Context

- Proposals should be progressed through a comprehensive masterplanning process, informed by the Kentish Town Planning Framework and the Regis Road Area Guidance, which has been prepared by the Council as an addendum to the Planning Framework.
- The Kentish Town Neighbourhood Plan identifies Regis Road as a potential area for mixed-use development. It sets out a number of criteria to guide development within the Regis Road site. The Plan notes that the site is currently underused and states that the intensification of the site through mixed-use development, including housing, industry, offices, start-ups, and other uses, is supported by the local community subject to consideration against relevant policies.
- The Neighbourhood Plan also includes a policy on the future development of the Holmes Road depot site.
- The Council is progressing a regeneration strategy involving using Camden's land assets on Regis Road and Holmes Road as an enabler and catalyst for the regeneration that will bring forward the benefits envisaged in the Planning Framework and Neighbourhood Plan. The strategy's objectives include enabling re-provision of the Recycling Centre and other Council service provision as necessary, ensuring continuous operation.

Development and Design Principles

Development must:

1. be designed to create a vibrant and sustainable new mixed-use neighbourhood that is integrated into the surrounding area through excellent design and architecture, providing signiicant intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses, to create a socially diverse place that builds on the distinctive community and character of Kentish Town;
2. ensure that a comprehensive approach is taken to site design and layout, having regard to the Kentish Town Planning Framework and Kentish Town Neighbourhood Plan;
3. intensify industrial and other employment uses through efficient design that enables co-location with housing and other proposed uses;
4. ensure that non-employment uses do not co promise the operation of employment uses;
5. provide a range of employment uses, including industrial and storage, warehouse and logistics uses, and affordable workspace, to increase the range of business premises and sectors on site, and provide significant additional jobs;
6. seek to contribute to the continued success of existing business clusters, including light industry and the creative and knowledge sectors, and maintain the area's role providing for businesses supporting London's Central Activities Zone;
7. seek to retain existing businesses that wish to stay on the site, where possible, and in particular uses that support the functioning of the CAZ or local economy. The developer should work with existing businesses to understand their requirements, ambitions and the potential for reprovision or relocation. A business retention / relocation strategy must be provided as part of the planning application for the site;

Allocation C2

Regis Road and Holmes Road depot

8. ensure that any provision of retail, food and drink uses is of an appropriate scale and is designed to complement, and not compete with or cause harm to, the vitality and viability of existing centres, in particular Kentish Town and Queen's Crescent. Smaller scale provision will be supported where it is intended to serve the needs of those living in, working in, or visiting the site, and where it is designed and located to activate key public spaces;
9. reprovide on site the existing housing floorspace (including the affordable housing) from the Holmes Road Depot site, in addition to the required new housing provision across the wider scheme area;
10. make provision for the particular housing needs identified in Policy H6 where appropriate, and consider the inclusion of affordable housing for older people, or other people with care or support requirements, as a proportion of the overall additional affordable housing provision;
11. significantly improve connections both through the site, and between the site and the surrounding area, to promote active travel and ensure that the site is successfully integrated into the wider Kentish Town area;
12. ensure that the design and layout of the site gives priority to the movement of pedestrians, people using wheelchairs, cyclists and public transport over the operational, servicing and parking demands of private vehicles and that vehicle movements and parking provision are minimised. Where new and/or improved routes are provided, these should be designed to be inclusive, accessible, welcoming, safe, green, well-lit and overlooked;
13. provide a variety of high quality green and open spaces and new green infrastructure, including new civic spaces, active spaces for play, landscaped green amenity spaces and natural to semi-natural space for nature conservation. These should be designed and managed in accordance with Policy SC4 (Open Space);
14. provide a new public square as a focus for the area and community activity;
15. contribute towards the provision of new community facilities and/or the improvement of existing facilities to meet increased resident needs in accordance with Policy SC3 (Social and Community Infrastructure);
16. include the provision of free, publicly accessible toilets suitable for a range of users, including changing places toilets, and free drinking water;
17. create new and enhance existing areas of biodiversity across the site;
18. enhance biodiversity corridors along the railway lines to the north and northwest of the site, (which are a designated Grade I Site of Important Nature Conservation) in order to support biodiversity and create and improve connections for wildlife to support the delivery of the Camden Nature Corridor;
19. ensure that conflict between servicing traffic and public areas is minimised, with separation as far as possible;
20. be designed to be compatible with, and facilitate, the development of neighbouring sites, in particular the Murphy site;

Allocation C2

Regis Road and Holmes Road depot

21. explore the provision of temporary (meanwhile) uses on the site to maintain activity as a comprehensive scheme is progressed. The Council will expect a meanwhile use strategy for this site to be submitted as part of plans for comprehensive development, in line with considerations set out in the Kentish Town Planning Framework; and

22. be taken forward in a coordinated way, working jointly with other landowners and neighbouring sites. A phasing plan will be required at the planning application stage to demonstrate how the delivery of the site will be taken forward. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure.

The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 52 m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

Infrastructure Requirements

Development must:

23. retain or reprovide the Regis Road Recycling Centre and other Council service provision, as necessary, unless suitable compensatory sites are provided elsewhere that replace the existing service provision. The continuous availability of services must be maintained in all circumstances. Re-provision of the Recycling Centre must replace the maximum throughput achievable at the existing site;

24. ensure that Regis Road is transformed into a green pedestrian and cycling route by moving large vehicles on to a separate service road in advance of any significant commercial development. This should be included as part of the Phasing Plan required for the development;

25. provide a new safe and attractive pedestrian and cycle route between Regis Road and Kentish Town Road via York Mews; and the wider area;

26. provide a new pedestrian and cycle route between Regis Road and Arctic Street;

27. provide a new connection between Regis Road and Holmes Road;

28. provide a new connection to Spring Place next to the Holmes Road Depot. This should be designed to ensure that it supports both pedestrian and cyclist movement, and local servicing in a controlled manner;

Allocation C2

Regis Road and Holmes Road depot

29 provide a new north-south pedestrian and cycle route along 'Makers Lane' (the new route proposed between employment premises on Highgate Road and Kentish Town West) to connect Kentish Town West with the Murphy site and the wider area;

30. significantly improve the junction of Regis Road and Kentish Town Road to create a safe, welcoming and legible entrance to the new neighbourhood that prioritises the movement of pedestrians and cyclists and provide servicing access for the new employment uses;

31. provide, or facilitate and contribute towards, a new pedestrian and cycle bridge across the railway line to connect the Regis Road and Murphy sites, to provide a connection to the Heath Line, Hampstead Heath and the wider area;

32. contribute towards improvements at Kentish Town Thameslink and Underground station (including the provision of step-free access, a new station entrance and an enhanced town square) and Gospel Oak station (including a new eastern access and improved public realm); and

33. contribute towards the delivery of the Camden Nature Corridor.

Other Considerations

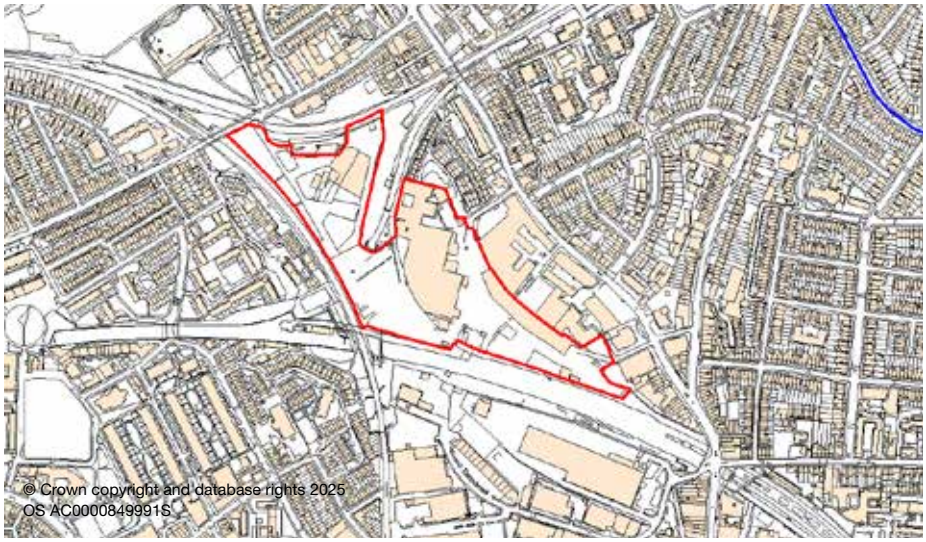
- Part of the site is within a viewing corridor identified in the London View Management Framework SPG.
- Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).
- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Part of 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.
- 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.

Allocation C3

Murphy Site

Key plan

Site plan



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Address	J. Murphy & Sons Limited, Highgate Road
Area	6.6 hectares
Allocated Use	Industry / employment; permanent self-contained homes and student accommodation; community uses; open space
Indicative Housing Capacity	750 additional self-contained homes
Description of Existing Site	The site is characterised by low intensity industrial use, open yard space and vehicle parking, with Murphy's headquarter offices located within the northernmost former locomotive shed. The site is bounded by railway lines to the north, west and south, and has limited access points. The site is predominantly owned and occupied by the Murphy group, with some land in Network Rail ownership.

Context

- The Murphy site forms part of the Kentish Town Industry Area, which is considered to be a Locally Significant Industrial Site (LSIS) in terms of the London Plan.
- Part of the site lies within the Dartmouth Park neighbourhood area and part lies within the Kentish Town neighbourhood area. The site is identified in the Kentish Town Neighbourhood Plan as being within the Kentish Town Potential Development Area. The Plan supports the mixed-use redevelopment of the site for housing, business and industrial uses. The Dartmouth Park Neighbourhood Plan identifies the site as providing an opportunity for development for a mix of residential and business/ employment units, to enhance the area, and sets out aspirations for any development.

Allocation C3

Murphy Site

Development and Design Principles

Development must:

1. deliver an employment-led development, designed to create a vibrant, sustainable new mixed-use area, taking the opportunity for significant intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses;
2. ensure that a comprehensive approach is taken to site design and layout, through the preparation of a masterplan, having regard to the Kentish Town Planning Framework, Kentish Town Neighbourhood Plan and Dartmouth Park Neighbourhood Plan;
3. be taken forward in a coordinated way, working jointly with other landowners and neighbouring sites. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure;
4. intensify industrial provision to increase, or at least maintain, industrial, storage and warehousing capacity, and provide for other high density employment uses reflecting existing local business clusters and Camden's growth sectors;
5. use efficient design to allow co-location with housing and other proposed uses, ensuring that the introduction of non-employment uses does not compromise the operation of existing or future employment uses;
6. ensure that the intensification of employment uses provides high-quality, modern, flexible employment spaces, and significantly increases the number of jobs on the site. The provision of a significant element of affordable workspace will also be expected;
7. seek to contribute to the continued success of existing business clusters, including light industry and the creative and knowledge sectors, and maintain, and where possible expand, the area's role providing for businesses supporting London's Central Activities Zone;
8. ensure the level of provision of new office floorspace avoids changing the character of the employment offer on this designated industrial site. Large floorplate 'corporate' offices are unlikely to considered suitable;
9. ensure that any provision of retail and food and drink uses is of a scale appropriate to serving the needs of those living in, working in or visiting the site and would complement, and not compete with or cause harm to, the vitality and viability of existing centres, in particular at Kentish Town and Queens Crescent;
10. optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply). Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation);
11. make provision for the particular housing needs identified by Policy H6 where appropriate, and seek to include Extra Care housing and supported housing for people with learning disabilities, as a proportion of the additional affordable housing provision;
12. provide substantial new, welcoming, accessible and safe open space and public areas;
13. include the provision of free, publicly accessible toilets suitable for a range of users, including changing places toilets, and free drinking water;

Allocation C3
Murphy Site

14. create new and enhance existing areas of biodiversity across the site;
15. enhance the biodiversity corridors along the railway lines to the north and north east of the site, which are a designated Grade I Site of Important Nature Conservation to support biodiversity and create and improve connections for wildlife;
16. consider the community's desire to maintain the view across the site towards Parliament Hill from the area adjacent to Kentish Town Station in accordance with the Kentish Town and Dartmouth Park Neighbourhood Plans;
17. include provision for young people, and inclusive community space, to support the local community. Development should also seek to complement and enhance the area's existing cultural offer;
18. ensure that the design 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;
19. seek to retain and reuse the locally listed locomotive sheds and the attached and adjacent ancillary structures as a key feature any development;
20. seek to ensure that the site is designed to minimise vehicle movements and parking;
21. fully assess the transport implications of the constrained access to the site and reflect this in the type of employment uses provided on site. A transport strategy to mitigate the site-specific constraints should be developed, and should explore new access points, freight consolidation, servicing, and limiting traffic;
22. ensure that conflict between servicing traffic and public areas is minimised, with separation as far as possible;
23. deliver significant improvements to access into the site and connections to surrounding areas;
24. include a new green corridor linking Kentish Town Road and Hampstead Heath to form the key pedestrian priority route through the site (the 'Heath line'). This must include the provision of cantilevered access over the railway line between the site and the railway bridge on Kentish Town Road. The route should be accessible to all with a green and attractive character, significantly enhancing biodiversity;
25. seek to provide a new route between employment premises on Highgate Road and Kentish Town West to connect the area's business communities ('Makers Lane');
26. be designed to be compatible with, and facilitate, the development of neighbouring sites, in particular Regis Road; and
27. explore the provision of temporary (meanwhile) uses on the site to maintain activity as a comprehensive scheme is progressed. The Council will expect a meanwhile use strategy for this site to be submitted as part of plans for comprehensive development, in line with considerations set out in the Kentish Town Planning Framework.

The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m – 45m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

Allocation C3
Murphy Site

Infrastructure Requirements

Development must:

28. provide, or facilitate, and contribute towards, new pedestrian and cycling connections to adjacent sites, including a new north-south cycle route from Kentish Town to Highgate Road and a new pedestrian and cycle bridge across the railway line, to connect the Murphy and Regis Road sites, to facilitate pedestrian and cycling movement and provide connections to the wider area;
29. deliver improvements to Greenwood Place;
30. contribute towards improvements at Kentish Town Thameslink station (including the provision of step-free access, a new station entrance and an enhanced town square) and Gospel Oak station (including a new eastern access and improved public realm); and
31. contribute towards the delivery of the Camden Nature Corridor.

Other Considerations

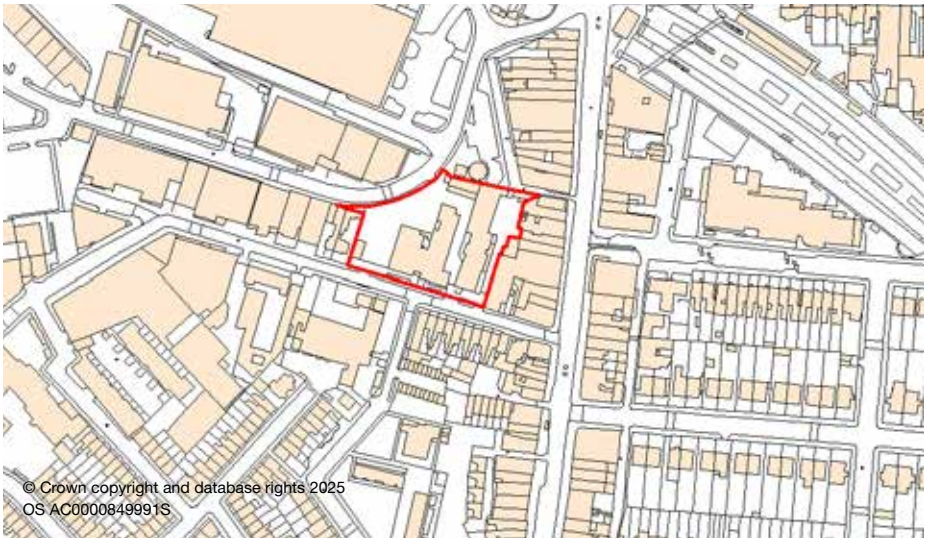
- Part of the site is within a viewing corridor identified in the London View Management Framework SPG.
- Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).
- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Part of 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.
- 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.

Allocation C4

Kentish Town Police Station

Key plan

Site plan



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Address	Kentish Town Police Station, 10-12A Holmes Rd
Area	0.45 hectare
Allocated Use	Police facilities; permanent self-contained homes and student accommodation
Indicative Housing Capacity	35 additional self-contained homes
Description of Existing Site	This site contains a listed Victorian police station (Station House), with a more modern annex building attached, and an eight storey police Section House. It also includes a yard, vehicle parking and some small-scale structures. The site fronts on to Holmes Road but has vehicular access to Regis Road at the rear.

Context

- The Metropolitan Police Service intend to retain the police use of the station and annex to meet operational requirements but there is potential to make more efficient use of parts of the site, such as the yard / parking space and the Section House. The Council would support the site being taken forward as part of the development of Regis Road (Policy C3) if this enables a better solution to be found to meet the operational needs of the Metropolitan Police Service and support the delivery of the Regis Road masterplan.

Allocation C4

Kentish Town Police Station

Development and Design Principles

Development must:

1. provide for continued police facilities on this site, either alone, or part of, a mixed-use development of the site, comprising police facilities and permanent self-contained homes. Community uses and small-scale employment uses may also be suitable here;
2. ensure that the introduction of other uses on the site does not compromise police operational requirements;
3. preserve the listed police Station House building and not harm its setting, in accordance with Policy D5 (Historic Environment);
4. seek to retain the Section House building in accordance with Policy CC2 (Retention of Existing Buildings) and re-use to provide student accommodation. Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation;
5. optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply);
6. be designed to address both Holmes Road and Regis Road;
7. seek to provide a safe and attractive walking, wheeling and cycling route between Holmes Road and Regis Road to improve connections with surrounding communities; and
8. be designed to ensure that the main vehicular entrance to the site is from Regis Road in order to accommodate the Council's wider aspirations for the Holmes Road area.

Other Considerations

- 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).

Allocation C5

369 – 377 Kentish Town Road

Key plan

Site plan

Address	369 – 377 Kentish Town Road
Area	0.3 hectare
Allocated Use	Permanent self-contained homes; retail/restaurant
Indicative Housing Capacity	14 additional self-contained homes
Description of Existing Site	369-377 Kentish Town Road (also known as the 'car wash site') is a prominent corner site at the northern end of Kentish Town Road next to the railway bridge.

Context

- In March 2020 the Council granted planning permission (2019/0910/P) for the development of the site for a six/seven storey building and basement to provide 14 flats, with retail or a restaurant use at ground floor and basement levels, and a widened pavement on Kentish Town Road.
- The Kentish Town Neighbourhood Plan contains a site-specific policy for 369-377 Kentish Town Road which supports its mixed-use redevelopment combined with the widening of the pavement in front of the site and the relocation of the bus shelter.
- The widening of the pavement in front of the site is identified in the Plan as contributing to meeting the Neighbourhood Forum's aspirations for a Kentish Town Square.
- Implementation of the permission has commenced and therefore it will not expire, as confirmed by a Lawful Development Certificate (2023/2654/P).
- If the existing planning permission is not delivered to completion, the criteria below will be used to determine future planning applications on this site.

Allocation C5

369 – 377 Kentish Town Road

Development and Design Principles

Development must:

1. be designed to make more efficient use of the site, visually improve the area and help to facilitate movement through the Kentish Town area and access to the Murphy site;
2. facilitate links to any future development of the Murphy site and contribute towards creating a welcoming entrance to that key site. Should this lead to a reduction in the number of homes provided compared to the current planning permission, the Council will expect these to be reprovided as part of neighbouring developments;
3. be of a high quality design reflecting the site's prominent location on Kentish Town Road, within a strategic viewing corridor; the adjacent Conservation Area to the east; and the listed buildings nearby, including the Assembly House public house to the south on the other side of Kentish Town Road; and
4. retain the approved setback building line fronting Kentish Town Road to assist with pedestrian safety.

Infrastructure Requirements

Development must:

5. be designed to facilitate the future delivery of an attractive pedestrian and cycle route to link Kentish Town Station to Hampstead Heath, and connections to the Murphy site, for example a walkway cantilevered over the adjacent railway cutting; and
6. contribute towards the relocation of the bus shelter, to improve passenger and pedestrian safety, consistent with aspirations for a new Kentish Town Square.

Other Considerations

- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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).
- The site is within a viewing corridor identified in the London View Management Framework SPG.

Allocation C6

Kentish Town Fire Station

Key plan

Site plan

Address	Kentish Town Fire Station, 20 Highgate Rd
Area	0.24 hectares
Allocated Use	Fire station; permanent self-contained homes and student accommodation
Indicative Housing Capacity	30 additional self-contained homes
Description of Existing Site	The site lies to the north of Kentish Town's town centre and is occupied by the operational Kentish Town Fire Station. The London Fire and Emergency Planning Authority's Asset Management Plan rates the site as having poor functionality and being in poor condition, listing it as a priority site for improvement through redevelopment rather than relocation.

Context

- This site provides an opportunity to deliver a replacement fire station to better meet the needs of the London Fire Brigade and introduce housing as an additional use to make more effective use of the site. The provision of student accommodation on the site may also be considered acceptable. Mixed-use development involving an operational fire station and housing accommodation has taken place elsewhere in London.
- Should the existing fire station be declared surplus to the operational needs of the London Fire Brigade, with the service being provided at another location, the site should be assessed for suitability for an alternative community use. Where it can be demonstrated to the Council's satisfaction there is no reasonable prospect of alternative community use as part of a mixed-use scheme, the Council's preferred alternative is development for housing including affordable homes.

Allocation C6

Kentish Town Fire Station

Development and Design Principles

Development must:

1. optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply). Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation);
2. ensure that a design-led approach is taken to delivering the optimum amount of development on the site, and that, where demolition is proposed this should be justified in accordance with Policy CC2 (Retention of Existing Buildings);
3. ensure that the incorporation of housing as part of a mixed-use scheme does not compromise the operation of the fire station;
4. be designed in accordance with the 'agent of change' principle to ensure that potential conflicts between the uses on the site, and between the site and surrounding properties, are minimised, and must not cause unacceptable harm to the amenity or quality of life of the occupants of nearby properties or new homes on the site. A noise assessment and proposed mitigation measures should therefore be submitted as part of any planning application;
5. be designed to respond to, and enhance the setting of, the listed Christ Apostolic Church opposite;
6. retain existing trees and provide suitable new planting and landscaping in accordance with Policy NE3 (Tree Protection and Planting); and
7. improve the relationship between the site and the surrounding area, particularly Highgate Road, Fortess Road and Fortess Walk.

Other Considerations

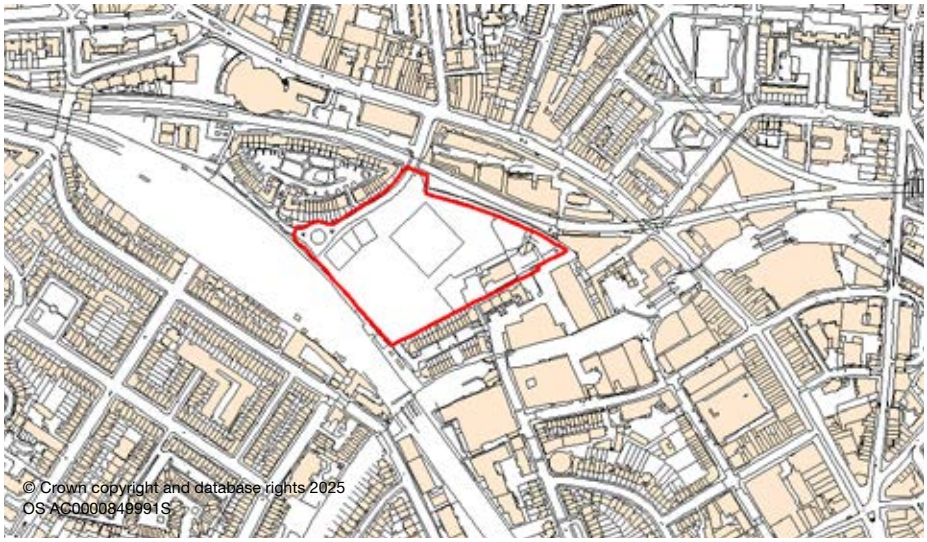
- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Proposals involving substantial demolition 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).

Allocation C7

Morrisons supermarket

Key plan

Site plan



Address	Morrisons supermarket, Chalk Farm Road NW1 8EH
Area	2.7 hectares
Allocated Use	Permanent self-contained homes, employment (offices and maker spaces), retail, food and drink, community and leisure use
Indicative Housing Capacity	644 additional self-contained homes
Description of Existing Site	Site was previously in use as a Morrisons supermarket, with associated car parking. The site sits between railway lines in an elevated position looking down into the markets.

Context

- The site is covered by the Council's adopted Camden Goods Yard Planning Framework Supplementary Planning Document (SPD). Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site.
- This a key site in the delivery of the Council's aspirations for the Camden Goods Yard area, in terms of its location and the scale of opportunity it presents.
- This site will make a significant contribution to the Council's housing supply, with the permitted schemes (2017/3847/P and 2022/3646/P) delivering 644 homes. Should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including the on-site affordable housing) to be maintained or increased and the key benefits for the wider area to be delivered.
- If the existing planning permission is not implemented, or is only partially implemented, the criteria below will be used to determine future planning applications on this site.

Allocation C7

Morrisons supermarket

Development and Design Principles

Development must:

1. deliver a range of housing types and tenures in accordance with Policy H6 (Housing Choice and Mix);
2. include a mix of employment uses, including affordable workspace and workshops / maker spaces, in a range of unit types and sizes;
3. reprovide a supermarket on site and include small scale retail and / or food and drink uses that add variety to Camden Town centre. Public house uses, or hot food takeaway uses, will not be supported in this sensitive frontage, as they are well represented in the town centre;
4. successfully integrate with existing neighbourhoods and address the site's current separation;
5. provide an attractive and inviting gateway from Chalk Farm Road, and improved connections with the markets;
6. be designed to reference both national, local, and lost, historical features, particularly the site's industrial and transport heritage, and celebrate the heritage significance of the Goods Yard. The Council supports proposals to further open-up the subterranean architecture of tunnels and vaults and will expect the detailed layout of the site to retain the possibility of public access to the 'Winding Vaults';
7. give priority to walking, wheeling and cycling, with vehicles only able to access the site from Chalk Farm Road. New routes should be direct, accessible, attractive and safe. Provision of step-free options is considered essential for ensuring inclusive access, given the changes in levels across this site;
8. remove existing car parking in line with this Plan's car-free approach;
9. deliver public open spaces of varying scale and character that provide a range of experiences and activities, and which are inclusive, accessible and safe. The Council will give priority to the provision of green amenity areas and play space for the full range of ages; and
10. seek to ensure that open spaces include areas for biodiversity and wildlife, including new tree planting. Proposals will be expected to investigate the potential for the provision of vegetation buffers along the railway lines to create and improve connections for wildlife.

The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m – 53 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies. The Council has granted planning permission for a development of up to 56m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development.

Allocation C7

Morrisons supermarket

Infrastructure Requirements

Development must:

11. contribute towards the delivery of a new route for pedestrians and cyclists, adjacent to the West Coast mainline railway, that connects Regent's Park Road bridge with the Regent's Canal towpath ('Stephenson's Walk'), creating opportunities to reveal, restore and access the heritage assets related to the original railway, as set out in the Camden Goods Yard Planning Framework. Developers will be expected to work with adjoining land owners to deliver this;
12. contribute towards delivering a route for pedestrians and cyclists to connect Oval Road / the Regent's Canal, with Juniper Crescent (via Gilbeys Yard) and onwards to Regent's Park Road and Primrose Hill; and
13. seek to deliver a sustainable long-term solution to minimise the environmental impacts of bus movements on residential amenity and the public realm in the Camden Goods Yard area, whilst ensuring that accessibility to bus services is maintained. The Council will expect applicants to engage with neighbouring landowners and other relevant stakeholders, to establish the optimal location for bus stands, to meet the needs of different users, while ensuring they do not unacceptably intrude upon people's experience and enjoyment of moving through a proposed scheme, including the practicality of alternative locations outside the site.

Allocation C7

Morrisons supermarket

Other Considerations

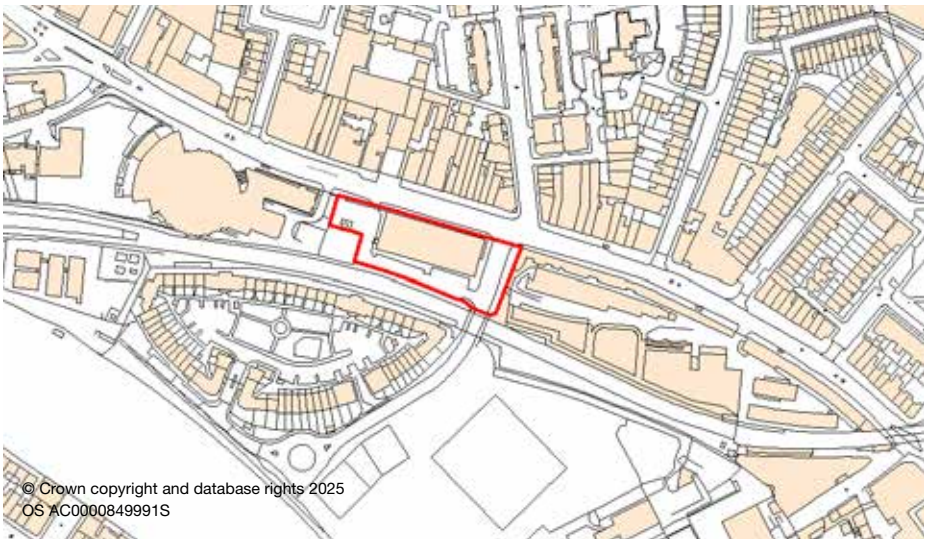
- Part of the site is within a viewing corridor identified in the London View Management Framework SPG.
- The access road leading to the existing supermarket, Juniper Crescent and the Network Rail site is safeguarded as a construction access for works associated with High Speed Two (HS2). Developers will therefore be expected to coordinate arrangements for traffic management and the timing of construction works with HS2 Ltd, and their contractors, to minimise/mitigate conflicts and cumulative impacts on the transport network.
- 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).
- 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.
- The Council will require the developer to submit a Community Support and Engagement Plan. This should set out the community vision and purpose for the new estate, and include assistance for volunteering and capacity building initiatives, to give residents a strong sense of ownership of the streets and spaces, helping to tackle anti-social behaviour. This should be planned across site boundaries to deliver optimal benefits, including interaction between communities living in different parts of the Goods Yard area and beyond.
- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.

Allocation C8

Former Morrisons petrol filling station

Key plan

Site plan



Area	0.39 hectares
Allocated Use	Permanent self-contained homes; employment (offices), retail, food and drink
Indicative Capacity	A contribution to delivery of housing off site will be expected, having regard to relevant Local Plan policies, including Policy H2. In the context of the development permitted, this contribution is encompassed in the housing-led development of the Morrisons supermarket site (Allocation C7).
Description of Existing Site	The site was previously occupied by a petrol station associated with the former Morrisons store. The open expanse of the petrol station forecourt has been replaced by a temporary food store, which commenced trading in early 2021. Once this temporary use has ceased, it is anticipated that the building will be dismantled allowing for a permanent development to optimise use of this site.

Allocation C8

Former Morrisons petrol filling station

Context

- The site is within the designated Camden Town centre and occupies a prominent location at the entrance to the wider Camden Goods Yard area.
- It is an important site in the Regent's Canal Conservation Area providing the setting and historic context for a number of heritage assets, having been within the Goods Yard wall area.
- The site is covered by the Council's Camden Goods Yard Planning Framework Supplementary Planning Document (SPD). Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site.
- The Council granted planning permission for this site, in conjunction with proposals for the Morrisons supermarket site, for an office building including retail and food and drink uses on lower floors (2022/3646/P).
- If this site were to come forward for development on its own, a scheme including self-contained housing will be sought by the Council, where this is consistent with activating the southern frontage of Chalk Farm Road and is co-ordinated with proposals for 100 Chalk Farm Road. The residential capacity will be assessed at that stage.
- If the existing planning permission is not implemented the criteria below will be used to determine future planning applications on this site.

Development and Design Principles

Development must:

1. be designed to take into consideration the development of adjacent sites, particularly 100,100a and 100b Chalk Farm Road, to ensure the optimal layout of the sites is achieved;
2. create a new and inviting entry for pedestrians and cyclists to the wider Camden Goods Yard area through the design of the site;
3. seek to provide residential floorspace to help meet Camden's identified housing needs;
4. be designed to setback the building line along Chalk Farm Road to deliver a wider pavement, providing an attractive route for pedestrians towards Chalk Farm Road station;
5. be designed to express the site's importance as a 'gateway' to the Goods Yard and historic setting;
6. provide a more engaging active frontage on the south side of Chalk Farm Road, drawing on the historic character and commercial function of this part of the Town Centre; and
7. maximise the potential for urban greening, including new tree planting.

Infrastructure Requirements

Development must:

8. reprovide in a suitable location the consented youth space secured through planning permission 2022/3646/P.

Allocation C8

Former Morrisons petrol filling station

Other Considerations

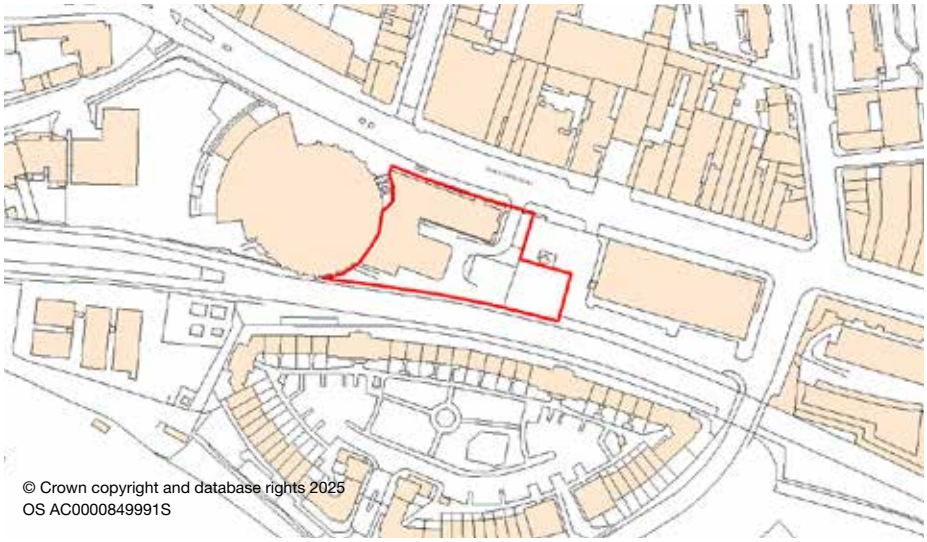
- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.
- 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.
- 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).
- Part of the site is within a viewing corridor identified in the London View Management Framework SPG.

Allocation C9

100 Chalk Farm Road

Key plan

Site plan



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Address	100, 100a and 100b Chalk Farm Road NW1 8EH
Area	0.73 hectares
Allocated Use	Permanent self-contained homes, student accommodation, employment, retail and cafés / restaurants (ground level)
Indicative Housing Capacity	30 additional self-contained homes and 264 student units
Description of Existing Site	The site comprises three commercial buildings with surface and underground car parks to the rear. A large 1970s office block faces onto Chalk Farm Road but has no reference to its context or engagement with the street. The north London railway viaduct is located behind the site, separating it from Juniper Crescent housing estate (Allocation C10). The Grade II* listed Roundhouse building is located immediately adjacent to the site and there is a Grade II listed cattle trough to the front of the site.

Context

- The site is covered by the Council's Camden Goods Yard Planning Framework Supplementary Planning Document (SPD). Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site.
- The site is located within the designated Camden Town centre. This part of the centre is fragmented and considered to detract from overall character and vitality of the Town Centre.
- The Council has granted planning permission for the demolition of existing buildings (2024/0479/P) and redevelopment of two new buildings of 6-12 storeys for purpose built student accommodation and listed building consent (2024/0539/L) for associated works.

Allocation C9

100 Chalk Farm Road

Development and Design Principles

Development must:

1. optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply). Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation);
2. ensure that a design-led approach is taken to delivering the optimum amount of development on the site, and that, where demolition is proposed this should be justified in accordance with Policy CC2 (Retention of Existing Buildings);
3. include a mix of employment uses, including affordable workspace and workshops / maker spaces, in a range of unit types and sizes;
4. be of a high-quality design that is appropriate to the high street location and responds to the area's historic context and assesses the impact of proposals on locally important views, of which those of the Roundhouse and Stables Market / the Horse Hospital are particularly critical;
5. seek to improve the engagement between the site and Chalk Farm Road. This could be achieved by providing appropriate town centre uses opening onto the street, to add diversity and vibrancy in this location;
6. be designed to preserve and enhance the setting of the Roundhouse and the adjacent gap, by opening up views of this heritage asset from Chalk Farm Road, whilst ensuring it can continue to be read as a separate entity in the townscape. Separations and setting back of development from the listed structure, splaying building lines, and the location of open space in proposals could help address this;
7. consider how the relationship with neighbouring land to the east, including the Former Petrol Filling Station site, can be enhanced, considering how this area may change;
8. ensure that a comprehensive approach is taken to site design and layout, having regard to the Camden Goods Yard Planning Framework Supplementary Planning Document and the planning application for the redevelopment of the site (2024/0479/P). This should demonstrate how employment (offices) and residential uses can be optimised;
9. be taken forward in a coordinated way, working jointly with other landowners and neighbouring sites. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure;
10. maximise the potential for urban greening, including new tree planting;
11. remove existing car parking in line with this Plan's car-free approach; and
12. ensure that existing night-time entertainment uses, in particular the neighbouring Roundhouse venue, are not adversely impacted by the development of the site, with off-site mitigation measures secured as a last resort in line with the agent of change principle.

Allocation C9

100 Chalk Farm Road

Infrastructure Requirements

Development must:

13. contribute towards the delivery of public realm improvements along Chalk Farm Road; and
14. contribute towards a feasibility study and delivery of step free access at Chalk Farm Road Station.

Other Considerations

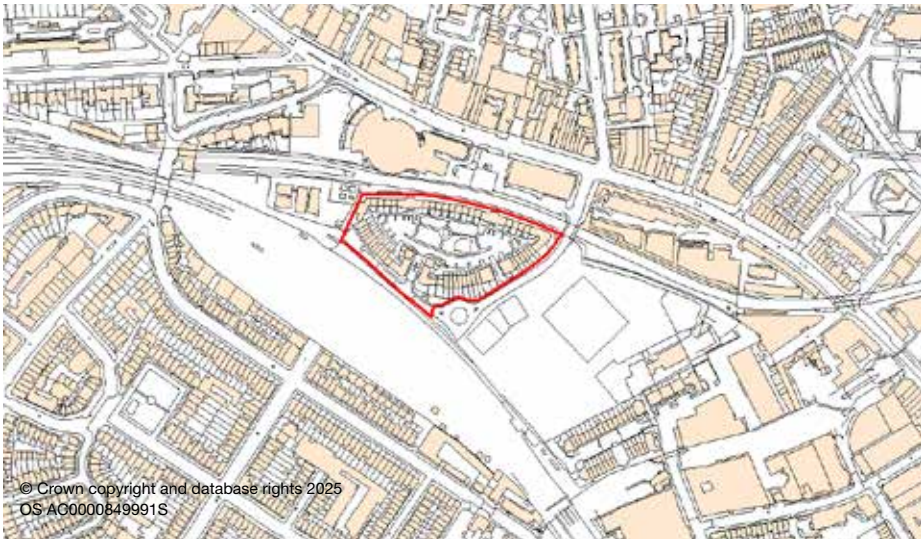
- The Council has resolved to grant planning permission for a development of up to 40m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development.
- The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.
- Due regard should be given to relocating and restoring the Grade II listed drinking fountain and cattle trough (on the Heritage at Risk Register) outside of the site boundary to preserve and enhance the historical significance.
- Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.
- 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).

Allocation C10

Juniper Crescent

Key plan

Site plan



Address	Juniper Crescent housing estate
Area	1.4 hectares
Allocated Use	Permanent self-contained homes, small-scale employment space and community uses (or other appropriate ground floor uses)
Indicative Housing Capacity	375 additional self-contained homes
Description of Existing Site	The Juniper Crescent housing estate comprises 3-4 storey flats and houses arranged around a central courtyard, public open space and play facilities. The site is separated from development along Chalk Farm Road by the north London Line railway viaduct and operational railway lines to the south and west.

Context

- The site is covered by the Council's Camden Goods Yard Planning Framework Supplementary Planning Document (SPD). Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site.
- As a pre-condition for funding support from the Mayor of London, housing regeneration schemes are subject to a ballot of residents. A ballot held in late 2022 and the majority of residents supported the proposed redevelopment of the estate.
- Landowners/developers will be expected to work together to address the estate's physical separation.
- The access road is safeguarded to enable work associated with High Speed Two (HS2). The cumulative impact and timings of HS2 works and other schemes in the Goods Yard area will need to be carefully considered.

Allocation C10
Juniper Crescent

Development and Design Principles

Development must:

1. deliver a housing-led scheme, incorporating significant regeneration benefits for the estate and the wider Camden Goods Yard area;
2. ensure that a design-led approach is taken to delivering the optimum amount of development on the site;
3. provide new and replacement homes to meet a range of housing needs in accordance with Policy H6, including the maximum reasonable amount of affordable housing. The inclusion of private homes is supported to help fund the provision of high quality replacement homes and to maximise delivery of additional affordable housing;
4. ensure there is no net loss of socially rented floorspace on site and that all existing households receive suitable replacement accommodation. This should be evidenced through an assessment of need submitted with a planning application;
5. consider the inclusion of affordable housing for older people, or other people with care or support requirements, as a proportion of the additional affordable housing provision;
6. be undertaken in phases to ensure disruption to residents is minimised. This should be set out in a housing phasing plan submitted with any planning application for the site. Where possible, estate residents should only be asked to move home once, with early phases of development being prioritised for decant housing;
7. ensure that complementary uses, such as employment or community uses are designed and located to reinforce the character of principal routes through the site to help create lively and well overlooked streets and spaces. An extension of Camden Town town centre into this location is not considered appropriate;
8. address the estate's physical separation, by enhancing sightlines into the estate; improving access to the estate, particularly to/from local town centres; and through design that expresses the site's historic role as part of the Goods Yard;
9. be designed to conserve or enhance the significance of the Grade II* Roundhouse and its setting, and respect locally important views in accordance with Policy D5 (Historic Environment);
10. maximise the potential for urban greening, including new tree planting;
11. rationalise parking on-site in line with Policy T5 (parking and car free development). Where existing residents' parking is reprovided, this should be located to minimise car movements within the site, and be designed to allow for repurposing when no longer required; and
12. seek to improve community safety, by enhancing natural surveillance at the entrances/exits to the estate and homes/apartment blocks. Development facing onto streets can assist with this.

The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 9m - 45 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

Allocation C10

Juniper Crescent

Infrastructure Requirements

Development must:

13. provide additional open space, including green space, play facilities and tranquil areas;
14. seek to ensure that open spaces include areas for biodiversity and wildlife;
15. support the creation of green routes along the railway edges;
16. contribute towards delivering a route for pedestrians and cyclists to connect Oval Road / Regent's Canal, with Juniper Crescent (via Gilbeys Yard) and onwards to Regent's Park Road and Primrose Hill;
17. contribute towards the delivery of a new route for pedestrians and cyclists adjacent to the West Coast Main Line railway, that connects Regent's Park Road bridge with Regent's Canal towpath ('Stephenson's Walk'), creating opportunities to reveal, restore and access the heritage assets related to the original railway, as set out in the Camden Goods Yard Planning Framework. Developers will be expected to work with adjoining landowners to deliver this; and
18. explore opportunities for optimising the location of bus stops and stands servicing the Morrisons supermarket site, and wider Goods Yard area, to minimise impact on resident amenity and enhance quality of place.

Other Considerations

- The Council will require the developer to submit a Community Support and Engagement Plan. This should set out the community vision and purpose for the new estate, and include assistance for volunteering and capacity building initiatives, to give residents a strong sense of ownership of the streets and spaces, helping to tackle anti- social behaviour. This should be planned across site boundaries to deliver optimal benefits, including interaction between communities living in different parts of the Goods Yard area and beyond.
- 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).
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.
- 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.
- Part of the site is within a viewing corridor identified in the London View Management Framework SPG.

Allocation C11

Network Rail land at Juniper Crescent

Key plan

Site plan

Address	Network Rail land at Juniper Crescent
Area	0.9 hectares
Allocated Use	Permanent self-contained homes, office / light industrial, operational railway use
Indicative Housing Capacity	55 additional homes
Description of Existing Site	The site is currently safeguarded to support High Speed Two (HS2) construction works and provides an operational access point to the railway. It is accessed from Chalk Farm Road via a secure access gate adjacent to homes in Juniper Crescent. Part of the site provides temporary office accommodation for enabling works associated with HS2 which sits within a compound. There are also various cabins and machinery used to support railway maintenance works. Furthest from the access gate is the site of the platforms that formed part of the former Primrose Hill station. The site also includes the former ticket hall on Regent's Park Road.

Context

- The site is covered by the Council's Camden Goods Yard Planning Framework Supplementary Planning Document (SPD). Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site.
- The Council considers this to be an important site in realising an accessible connection with Regent's Park Road, Primrose Hill and the wider area. This would be a substantial benefit for residents and workers in the Camden Goods Yard area.
- It is recognised that in the short to medium term this site is required for project and construction teams associated with the delivery of HS2. Regardless of whether the site is needed in the long-term for operational railway purposes, the Council wishes to secure public access to the railway bridge at Regent's Park Road, overlooking the site.
- The Council would support a railway use being maintained on the site, and would also support permanent employment use and permanent self-contained housing, where this results in a compatible mix of uses.

Allocation C11

Network Rail land at Juniper Crescent

Development and Design Principles

Development must:

1. ensure that where office or light industrial employment uses are proposed that they are compatible with the existing and emerging character of neighbouring sites and the wider Camden Goods Yard area;
2. be designed to conserve or enhance the significance of the Grade II* Roundhouse and its setting, and respect locally important views in accordance with Policy D5 (Historic Environment);
3. ensure the design and layout gives careful consideration to its relationship with the adjacent Juniper Crescent site;
4. consider what noise mitigation measures are likely to be required in line with Policy A4 (Noise Pollution) given the location of the site immediately adjacent to the West Coast Main Line; and
5. seek to establish a green corridor along the edge of the railway, which can act as a buffer and habitat for wildlife in connection with adjacent sites.

The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 9m - 45 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

Infrastructure Requirements

Development must:

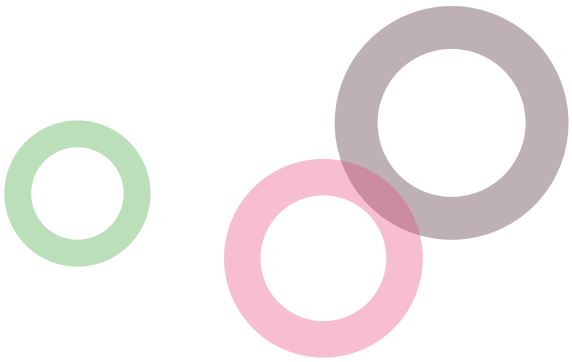
6. provide public access to the railway bridge at Regents Park Road, without prejudicing the reopening of Primrose Hill station, should this become viable in the future;
7. contribute towards the delivery of a new route for pedestrians and cyclists, adjacent to the West Coast Main Line railway, that connects Regent's Park Road bridge with Regent's Canal towpath ('Stephenson's Walk'), creating opportunities to reveal, restore and access the heritage assets related to the original railway, as set out in the Camden Goods Yard Planning Framework. Developers will be expected to work with adjoining landowners to deliver this; and
8. consider whether the site could help address the issues identified in respect of bus operations on adjacent sites (Morrisons supermarket and Juniper Crescent). An operational area within the site could, for example, support a bus turning area at the end of the existing access road.

Allocation C11

Network Rail land at Juniper Crescent

Other Considerations

- 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).
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.

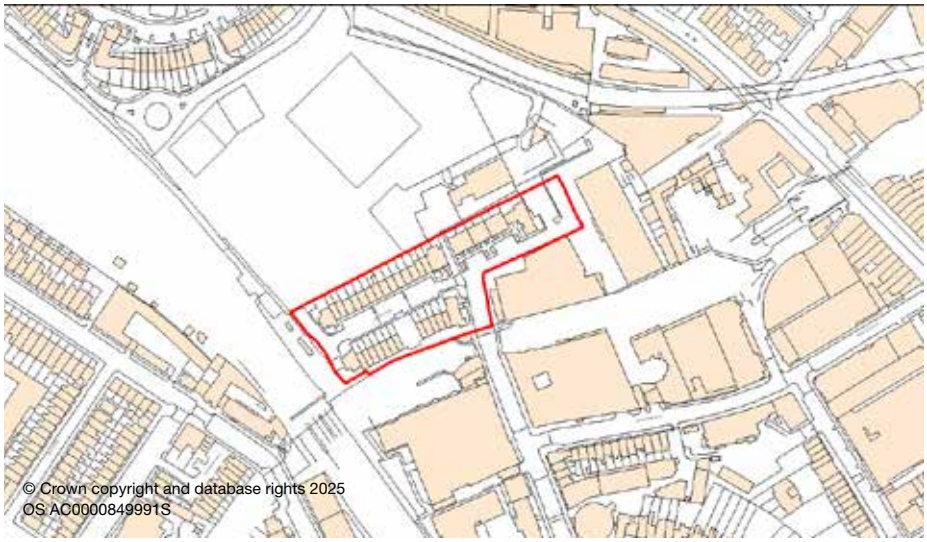


Allocation C12

Gilbeys Yard

Key plan

Site plan



Area	0.8 hectares
Allocated Use	Permanent self-contained homes, small-scale employment space, community use
Indicative Housing Capacity	120 additional self-contained homes
Description of Existing Site	Gilbeys Yard is a housing estate consisting of blocks of 3-4 storey flats and houses arranged in rows parallel to the Regent's Canal. The estate currently has limited public amenity space for residents. There is a poorly defined relationship with the adjoining Interchange yard, while a narrow pedestrian and cycle route leads into the Morrisons supermarket site (Allocation C7). The estate borders Camden Town town centre and is also prominent in views from the Regent's Canal and towpath.

Allocation C12

Gilbeys Yard

Context

- The site is covered by the Council's Camden Goods Yard Planning Framework Supplementary Planning Document (SPD). Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site.
- The site is adjacent to the Regents Canal, which is designated a site of Metropolitan importance for nature conservation.
- One Housing Group has been leading a consultation and engagement exercise with the residents of Gilbeys Yard about improving the standard of existing homes on the estate. A number of options are being considered, including the full redevelopment of the estate providing replacement accommodation and additional homes.
- As a pre-condition for funding support from the Mayor of London, housing regeneration schemes are subject to a ballot of residents. A ballot held in 2020 was unsuccessful. Residents have not been balloted again to date.
- In the event that a ballot is successful, a housing-led development that delivers significant regeneration benefits for the estate and the wider Camden Goods Yard area would be supported.
- The Council supports the continuing consultation and engagement process led by One Housing Group to evaluate future options for the estate and establish the support of existing residents.
- The inclusion of private homes is supported, to help fund the provision of high quality replacement homes and to maximise delivery of additional affordable housing.

Development and Design Principles

Development must:

1. provide new and replacement homes to meet a range of housing needs in accordance with Policy H6, including the maximum reasonable amount of affordable housing. The exact number of homes will be dependent on a full appraisal of the impacts of development on heritage assets, views and surrounding townscape;
2. consider the inclusion of affordable housing for older people or other people with care or support requirements, as a proportion of the additional affordable housing provision;
3. ensure there is no net loss of socially rented floorspace, and that all existing households receive suitable replacement accommodation, as demonstrated through an assessment of need;
4. consider the provision of appropriate complementary uses, such as workshops or community uses, to enliven streets and spaces. The site is not considered appropriate for an extension of Camden Town town centre;
5. be undertaken in phases to ensure disruption to residents is minimised. This should be set out in a housing phasing plan submitted with any planning application for the site. Where possible, estate residents should only be asked to move home once, with early phases of development being prioritised for decant housing;
6. be designed to respond to the industrial character of the canalside environment and wider Camden Goods Yard area, in terms of the architectural design and landscaping, taking opportunities to preserve and, where appropriate, enhance heritage assets, above and below ground, and protect locally important views. The proximity of the site to The Interchange building (Grade II listed) and the impact on the setting and views of this asset are particularly important;

Allocation C12

Gilbeys Yard

7. seek to integrate the estate more successfully into neighbouring sites, anticipating how the future context may change;
8. work with the landowner of the Interchange and market to resolve concerns about the existing servicing arrangements for the markets and drop-off/collection arrangements for taxis to minimise the impact of vehicles passing through the estate on residents;
9. rationalise parking on-site in line with Policy T5 (Parking and Car Free Development) and reduce vehicular dominance;
10. undertake the refurbishment of the yard, which is an important communal amenity area;
11. improve community safety through enhancing natural surveillance at entrances/exits to the estate and homes/apartment blocks;
12. contribute to improvements in the biodiversity of the Canal, which is designated as a Site of Importance for Nature Conservation; and
13. explore opportunities to incorporate measures to manage the effects of lighting on the Canal, to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.

Infrastructure Requirements

Development must:

14. contribute towards the delivery of a new route for pedestrians and cyclists, adjacent to the West Coast Main Line railway, that connects Regent's Park Road bridge with Regent's Canal towpath ('Stephenson's Walk'), creating opportunities to reveal, restore and access the heritage assets related to the original railway, as set out in the Camden Goods Yard Planning Framework. Developers will be expected to work with adjoining landowners to deliver this;
15. provide additional open space, including green space, play facilities and tranquil areas; and
16. seek to ensure that open spaces include areas for biodiversity and wildlife including new tree planting. Proposals should support the creation of green routes along the railway edges as part of a continuous corridor adjacent to the West Coast Main Line.

Allocation C12
Gilbeys Yard

Other Considerations

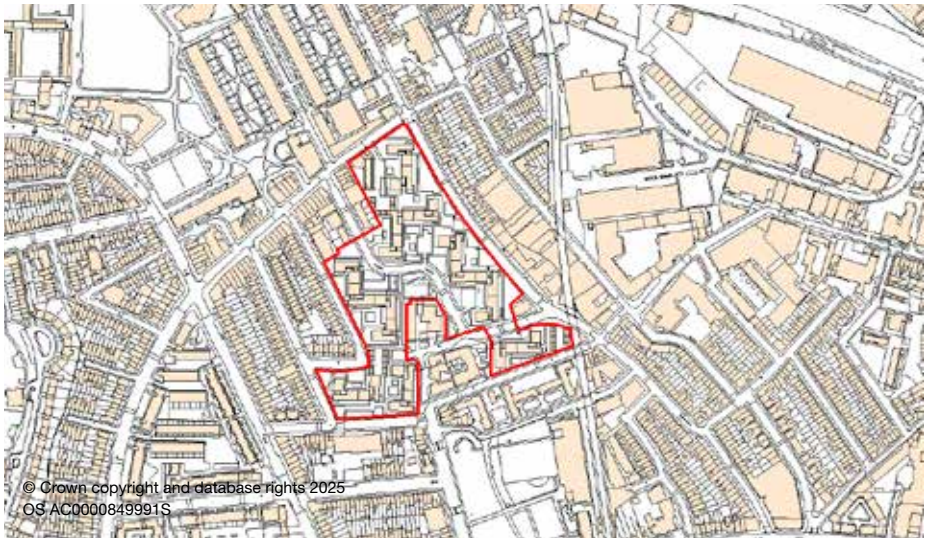
- The Council will require the developer to prepare and submit a Community Support and Engagement Plan. This should set out the community vision and purpose for the new estate, and include assistance for volunteering and capacity building initiatives, to give residents a strong sense of ownership of the streets and spaces, helping to tackle anti-social behaviour. This should be planned across site boundaries to deliver optimal benefits, including interaction between communities living in different parts of the Goods Yard area and beyond.
- Applicants should refer to Better Homes for Local People - the Mayor's Good Practice Guide to Estate Regeneration.
- 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.
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.
- 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.
- Part of the site is within a viewing corridor identified in the London View Management Framework SPG.

Allocation C13

West Kentish Town Estate

Key plan

Site plan



Address	West Kentish Town estate, NW5
Area	3.5 hectares
Allocated Use	Permanent self-contained homes, small-scale employment space and community uses (or other appropriate ground floor uses)
Indicative Housing Capacity	569 additional self-contained homes
Description of Existing Site	The Council estate contains of 316 homes and was constructed in the early 1960s following the demolition of Victorian street properties. The original linear routes of Carlton Street and Weedington Road were lost or rerouted when the estate was redeveloped. Parts of the surrounding area retain some of the historic character, much of which is preserved as part of the West Kentish Town Conservation Area.

Context

- The Gospel Oak and Haverstock Community Vision sets out the community's vision for the future of this area. The Council adopted the Gospel Oak and Haverstock Community Vision in November 2022 as a Supplementary Planning Document. Regard should be had to the Vision when taking forward the development of this site.
- Local engagement work with residents of the estate has identified a number of issues relating to their homes, the estate in general, as well as the wider area.
- The Council has assessed different options for the estate and found that it is unlikely to be viable to remedy the design and construction issues affecting the existing buildings. In a ballot in March 2020, an overwhelming majority of residents voted for the demolition and complete redevelopment of the estate.
- Careful consideration should be given to the phasing of the development to ensure the balanced delivery of new affordable and market homes.

Allocation C13

West Kentish Town Estate

Development and Design Principles

Development must:

1. deliver regeneration benefits for the wider community that help to address the local priorities set out within the Gospel Oak and Haverstock Community Vision;
2. reprovide existing homes to meet modern standards, ensuring no net loss of social housing, and maximise the delivery of additional affordable housing;
3. make provision for particular housing needs identified by Policy H6 where appropriate, and consider the inclusion of affordable housing for older people, or other people with care or support requirements, as a proportion of the additional affordable housing provision;
4. be undertaken in phases to ensure disruption to residents is minimised. This should be set out in a housing phasing plan submitted with any planning application for the site. Where possible estate residents should only be asked to move home once, with early phases of development being prioritised for decant housing, prior to large scale demolition of existing homes;
5. contribute towards the enhancement of the Queen's Crescent neighbourhood centre through the creation of a new frontage along the street to host community or commercial uses, as well as contributing towards the cost of highways and public realm improvements;
6. improve local walking, wheeling, and cycling routes, by providing a clear, safe and accessible route connecting Talacre Park with Queens Crescent;
7. create new and enhance existing areas of biodiversity across the site to support biodiversity corridors and create and improve connections for wildlife from nearby Sites of Important Nature Conservation to support the delivery of the Camden Nature Corridor;
8. rationalise parking on-site in line with Policy T5 (Parking and Car Free development). Where existing residents parking is reprovided, this should be located to minimise car movements within the site, and be designed to allow for repurposing when no longer required;
9. address the lack of private amenity space and cycle parking facilities identified by residents;
10. be designed to respect the sensitive heritage constraints, including the strategic view from Parliament Hill, as well as the nearby West Kentish Town and Inkerman Conservation Areas, and nearby listed buildings; and
11. seek to retain existing trees where possible.

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

Allocation C13

West Kentish Town Estate

Infrastructure Requirements

Development must:

12. contribute towards the delivery of new pedestrian and cycle routes to provide a direct link to Kentish Town high street and station and better link Queens Crescent with Talacre town Green, Gospel Oak station and Lismore Circus; and

13. contribute towards improvements to local open spaces. It should explore making provision for a hierarchy of open spaces including public, semi-public and private spaces with clear thresholds between them, and explore opportunities to integrate play within the development sites. New and refurbished spaces should provide opportunities for a greater range of users by being welcoming and inclusive for all.

Other Considerations

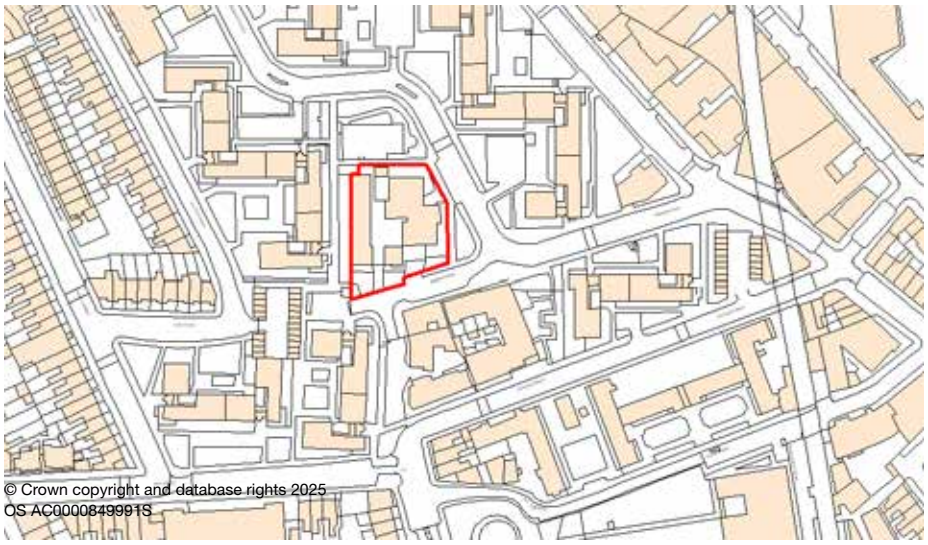
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Applicants will be expected to liaise with 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.
- 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).
- Applicants should refer to Better Homes for Local People - the Mayor's Good Practice Guide to Estate Regeneration.
- Part of the site is within a viewing corridor identified in the London View Management Framework SPG.

Allocation C14

Hawkridge House, Warden Road

Key plan

Site plan



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Address	Hawkridge House, Warden Road, London, NW5 4SA
Area	0.19 hectares
Allocated Use	Student accommodation
Indicative Housing Capacity	19 additional student units
Description of Existing Site	The site comprises 216 student units in a part 10, part 15 storey tower and 2 storey annex buildings, located on the western and southwestern boundaries of the site. The site is bounded by Warden Road to the south, which provides the main access to the site, and Weedington Road to the east. To the north is a multi-use games area. The site is adjacent to the West Kentish Town Estate, which is identified for regeneration by the Council and also allocated in this Local Plan (Allocation C13).

Context

- The buildings were most recently used as student accommodation for postgraduates of University College London. However, the buildings have been vacant since 2020.
- The Gospel Oak and Haverstock Community Vision was adopted by the Council as supplementary planning document in November 2022. It sets out the community's vision for the future of this area. Regard should be had to the Vision when taking forward the development of this site.
- The Camden Building Heights Study notes that the existing tall building on the site is 44.9m. Site Allocation C13, which is adjacent to this site, is identified as a location where tall buildings may be an appropriate form of development, with 12m - 40m considered the potentially appropriate height range.

Allocation C14

Hawkridge House, Warden Road

Development and Design Principles

Development must:

1. provide additional student accommodation in accordance with Policy H9 (Student Accommodation);
2. ensure the design and layout of the scheme gives careful consideration to its relationship with the adjacent West Kentish Town estate and its regeneration;
3. be taken forward in a coordinated way, working jointly with other landowners and neighbouring sites. The Council will resist schemes that prejudice future development and design quality across the wider area;
4. seek to improve the visual relationship with the street frontage to enhance the street scene;
5. explore opportunities to increase green amenity spaces between the buildings on site;
6. retain the existing tree and provide additional trees and vegetation, in accordance with Policy NE3 (Tree Protection and Planting); and
7. remove existing car parking in line with this Plan's car-free approach.

Infrastructure Requirements

Development must:

8. contribute towards the delivery of a new and improved pedestrian and cycle route to better link Queen's Crescent and Talacre Town Green, Gospel Oak Station and Lismore Circus; and
9. contribute towards the delivery of the Camden Nature Corridor.

Other Considerations

- Part of the site is within a viewing corridor set out in the London View Management Framework SPG.
- The indicative housing capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- 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).

Allocation C15

Wendling Estate and St Stephens Close

Key plan

Site plan

Address	Wendling Estate and St Stephens Close, NW5
Area	2.3 hectares
Allocated Use	Permanent self-contained homes, health and community facilities
Indicative Housing Capacity	509 additional self-contained homes
Description of Existing Site	The site provides 241 existing homes in three and four-storey blocks, which are divided into flats and maisonettes, and one block of 10 storeys divided into one bedroom flats. It is an inward-facing, deck-access estate. Streets surrounding the estate are faced by garages or back gardens, and entrances to the estate can be perceived as unwelcoming for visitors. The Wendling estate includes a nursery and health centre. St Martin's Church in proximity to the site is Grade I listed to the east and the Roman Catholic Priory Church of St, Dominics to the southwest of the site is Grade II* listed.

Context

- The Gospel Oak and Haverstock Community Vision sets out the community's vision for the future of this area. The Council adopted the Gospel Oak and Haverstock Community Vision in November 2022 as a Supplementary Planning Document. Regard should be had to the Vision when taking forward the development of this site.
- The Council is preparing development proposals for Wendling Estate and St Stephens Close. This will involve the redevelopment of all existing buildings as part of a comprehensive regeneration scheme. The Council undertook a ballot of residents in summer 2021. Residents voted in favour of the proposals based on a comprehensive redevelopment.
- The Council's priority for this site is the reprovision of existing homes to meet modern standards and the housing needs of residents.
- The site is adjacent to but not with the Mansfield and Parkhill Conservation Areas.

Allocation C15

Wendling Estate and St Stephens Close

Development and Design Principles

Development must:

1. deliver regeneration benefits for the wider community that help to address the local priorities set out within the Gospel Oak and Haverstock Community Vision;
2. reprovide existing homes to meet modern standards, ensuring no net loss of social housing and maximise the delivery of additional affordable homes;
3. make provision for particular housing needs identified by Policy H6C where appropriate, and consider the inclusion of affordable housing for older people or other people with care or support requirements, as a proportion of the additional affordable housing provision;
4. be undertaken in phases to ensure disruption to residents is minimised. This should be set out in a housing phasing plan submitted with any planning application for the site. Where possible estate residents should only be asked to move home once, with early phases of development being prioritised for decant housing, prior to large scale demolition of existing homes;
5. seek to provide active frontages and uses that engage with the street and improve the frontage to Malden Road and Southampton Road;
6. rationalise parking on-site in line with Policy T5 (Parking and Car Free development). Where existing residents parking is reprovided, this should be located to minimise car movements within the site, and be designed to allow for repurposing when no longer required;
7. be designed to promote safety and security in accordance with Policy A2 (Safety and Security). Any new development should maximise opportunities for the activation of the ground floor via front doors that face public streets and routes or public uses, ensuring clear sightlines and active surveillance and with a clearly defined hierarchy of spaces;
8. be designed to be sensitive to the surrounding townscape including the nearby Parkhill and Mansfield conservation areas and consider any impacts on the setting of the Grade II* St Dominic's Priory; and
9. seek to retain existing trees where possible.

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

Allocation C15

Wendling Estate and St Stephens Close

Infrastructure Requirements

Development must:

10. improve pedestrian and cycle permeability, ease of access and accessibility across the site;
11. explore the opportunity of providing a new route for pedestrians and cyclists, connecting Lismore Circus to St. Dominic's Priory;
12. explore the reprovision and enhancement of health and community facilities with partners to ensure no net loss in provision. If not reprovided as part of the estate, they should be provided elsewhere in the locality, preferably on sites within the Queen's Crescent neighbourhood centre;
13. contribute to the delivery of enhancements to Lismore Circus open space to make the space safer and more attractive to a wider range of age groups; and
14. explore opportunities arising from the regeneration of Bacton Low Rise to create new east to west routes and improve the estate's connectivity with the surrounding streets.

Other Considerations

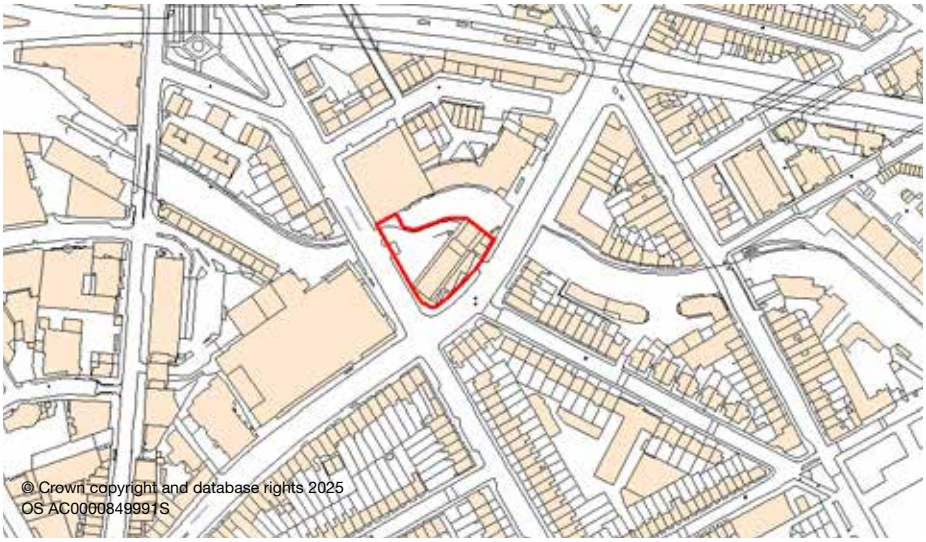
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Applicants will be expected to liaise with 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.
- 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).
- Applicants should refer to the Mayor's Good Practice Guide to Estate Regeneration.
- Part of the site is within a viewing corridor identified in the London View Management Framework SPG.

Allocation C16

Shirley House

Key plan

Site plan



Address	Shirley House; 25 -27 Camden Road
Area	0.18 hectare
Allocated Use	Student accommodation
Indicative Housing Capacity	197 student units
Description of Existing Site	Shirley House is a 7-storey office building on the corner of Camden Road and Camden Street, adjacent to the Regent's Canal. It is occupied by the British Transport Police headquarters with car parking at ground floor and basement levels. Between the building and the Canal is a yard used for parking and servicing.

Context

- The site is within the Regent's Canal Conservation Area.
- The Regent's Canal Conservation Area Appraisal identifies the existing office building as having a negative impact on the townscape, due to its undistinguished architectural quality, poor relationship with the Canal and effect in obscuring views of the listed Camden Bridge.

Allocation C16
Shirley House

Development and Design Principles

Development must:

1. support the delivery of student accommodation in accordance with Policy H9 (Student Accommodation);
2. ensure the design, layout and orientation of development positively relates to the Canal and local character;
3. Seek to improve the visual relationship with the street frontage to enhance the street scene, provide activity and natural surveillance;
4. contribute to improvements in the biodiversity of the Canal, which is designated as a Site of Importance for Nature Conservation; and
5. explore opportunities to incorporate measures to manage the effects of lighting on the Canal, to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.

Infrastructure Requirements

Development must:

6. consider the provision of infrastructure for canal moorings alongside the site.

Other Considerations

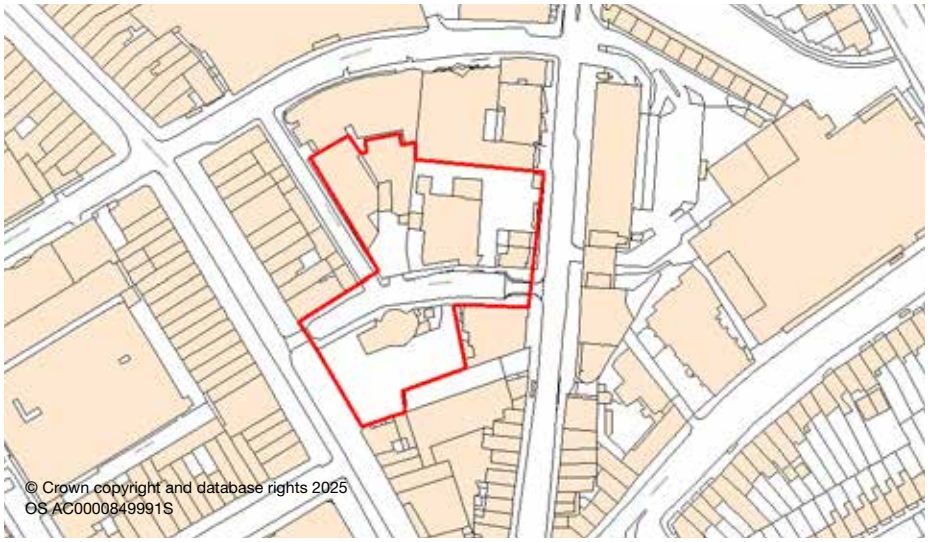
- The capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- Proposals involving substantial demolition will be required to submit a 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).
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- There is a critical trunk sewer running through this site which would need to be appropriately considered through the planning and design stage.

Allocation C17

Camden Town over station development

Key plan

Site plan



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Area	0.5 hectares
Allocated Use	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)
Indicative Housing Capacity	58 additional self-contained homes
Description of Existing Site	The Camden Town over-station development site is located in the heart of Camden Town. Transport for London (TfL) have acquired land to facilitate construction work associated with the station capacity project and to ensure the existing station entrance can stay open. The site includes 5-7 Buck Street which formerly served as an auction house and has more recently served as temporary affordable workspace for young entrepreneurs. The former Hawley Wharf infant school building was vacated in 2016, when the school relocated and has also been in temporary use. The Buck Street Market site fronting on to Camden High Road is currently used as a temporary box park market and food and drink premises. There is an existing ventilation shaft for the underground lines on part of the site adjacent to Buck Street; this would not be required for future upgrades to the station.

Allocation C17

Camden Town over station development

Context

- Transport for London (TfL) have ambitions to upgrade station capacity at Camden Town Underground Station and this remains a TfL ambition within the Plan period, however sufficient funding needs to be secured.
- Subject to funding being secured, delivery of the station capacity upgrade and a new station entrance will be contingent on a Transport and Works Act Order being confirmed by the Secretary of State, and therefore planning permission for these works is not required. The over-station development will, however, require a planning application to be submitted.
- The Council will expect landowners and developers to take a collaborative approach, working across site boundaries, to ensure a well-designed and successfully implemented scheme. A shared site agreement should be agreed between the main contractor for the station capacity project and the developer responsible for the construction works above the station, to ensure impacts on TfL's assets are appropriately assessed.

Development and Design Principles

Development must:

1. be designed to deliver a mixed use development incorporating a new station entrance and ancillary supporting facilities for the station, permanent self-contained homes, and employment uses, including retail along the Buck Street and Kentish Town Road frontages;
2. optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply). Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation);
3. ensure that a design-led approach is taken to delivering the optimum amount of development on the site. Where demolition is proposed, this should be justified in accordance with Policy CC2 (Retention of Existing Buildings);
4. provide a range of employment uses, giving consideration to existing uses and activities that have an established and growing presence in Camden Town, including premises for use by creative and cultural businesses, light industrial workshops, co-working space and space suitable for small and medium sized businesses;
5. not cause harm to the continuing operation of uses on nearby sites including the Electric Ballroom;

Allocation C17

Camden Town over station development

6. be designed to provide active frontages that engage with the street along Camden High Street, Buck Street and Kentish Town Road, with a continuous building line established along Buck Street;
7. include noise mitigation measures to ensure that the ability of existing premises to operate effectively is not adversely affected in line with the agent of change principle, in accordance with Policy A4 (Noise and Vibration);
8. be designed in a way that gives careful consideration to the design and layout of the residential accommodation, given its proximity to the station entrance and the levels of pedestrian activity that are anticipated when the station is operational;
9. provide a range of retail unit sizes, appropriate to the context of Camden Town's retail role and function and the size and location of this site;
10. respond positively and sensitively to local context and character in accordance with Policy D1 (Achieving Design Excellence) and be designed to achieve a positive relationship with the Camden Town Conservation Area and Regent's Canal Conservation Area. This is likely to involve a transition in height and scale across the site from the more intimate, low-rise nature of Stucley Place to Kentish Town Road, which is generally lined by buildings of 4-5 storeys south of Hawley Crescent;
11. explore the creation of a new civic space in front of the station entrance to create a strong 'sense of arrival' as people emerge from the station;
12. improve the street environment in this area, particularly along Buck Street, to ensure that it is easy and safe to move through, inclusive, and accessible for all, to meet the needs of all residents, particularly people using wheelchairs and people with physical disabilities. The provision of wider pavements along Buck Street and accessible signage for visitors and tourists could assist with this;
13. incorporate appropriate acoustic measures to address noise from the evening and night-time operation of the station; the movement of people through the area; and the residual transmission of noise and vibration from the underground station and platforms; and
14. be designed to work effectively alongside Transport for London's existing, enhanced or new infrastructure.

Allocation C17

Camden Town over station development

Infrastructure Requirements

Development must:

15. provide step-free access to Camden Town underground station;
16. contribute to public realm improvements in the surrounding area. Priorities include the widening of pavements; protecting and enhancing cycle lanes; the delivery of urban greening measures, including tree planting; seating and signage;
17. explore opportunities for decentralised heating and cooling (including the ability of the Underground station to supply development above ground); and
18. Contribute towards improvements at Inverness Street Market.

Other Considerations

- The Council may seek to use planning conditions to ensure the long term retention of employment floorspace within Use Class E from conversion to other town centre uses.
- 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).
- The Hawley Wharf school building is on the Council's Local List due to its architectural and townscape significance. The auction house/ piano factory (5-7 Buck Street), while not having any formal heritage status, is recognised as having merit in conservation and design terms. Demolition of these buildings may not require planning permission where such works are confirmed by the Secretary of State through a Transport and Works Act Order. However, the existing quality of the buildings, their heritage value, their embodied carbon, and the uses they support, should inform development requiring consent from the local planning authority and the loss of these buildings is unlikely to be acceptable without the station works coming forward on this site.
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.

Allocation C18

UCL Camden Campus; 109 Camden Road

Key plan

Site plan

Address	109 Camden Road, London, NW1 9HZ
Area	1.52 hectares
Allocated Use	Student accommodation
Indicative Housing Capacity	180 additional student units
Description of Existing Site	This is a triangular site to the rear of properties along Bartholomew Road (north) and Rochester Road (south) and bounded to the east by Camden Road. There are two access points to the site: one from Camden Road, along the south-eastern boundary, and the other from Rochester Mews to the south. The site is gated and there is no public access through it. The site largely comprises student accommodation (714 existing rooms) for UCL students in several separate buildings with a reception area and communal areas for students.

Context

- Part of the south of the site is within the Rochester Conservation Area.
- The site is adjacent to the Kentish Town Neighbourhood Plan area to the north.

Allocation C18

UCL Camden Campus; 109 Camden Road

Development and Design Principles

Development must:

1. support the delivery of student accommodation in accordance with Policy H9 (Purpose-built Student Accommodation);
2. be designed to ensure that any proposed increase in height is focussed in the central part of the site, to reduce the impact on the surrounding area and adjacent heritage assets;
3. protect existing open space on the site and ensure that new and /or enhanced open space is provided in accordance with Policy SC4 (Open Space). As part of this, development should explore opportunities to increase green amenity spaces between the buildings on site; retain the existing trees and provide additional trees and vegetation, in accordance with Policy NE3 (Tree Protection and Planting); and
4. protect the existing allotments and food growing on site in accordance with Policy SC5 (Food Growing).

Other Considerations

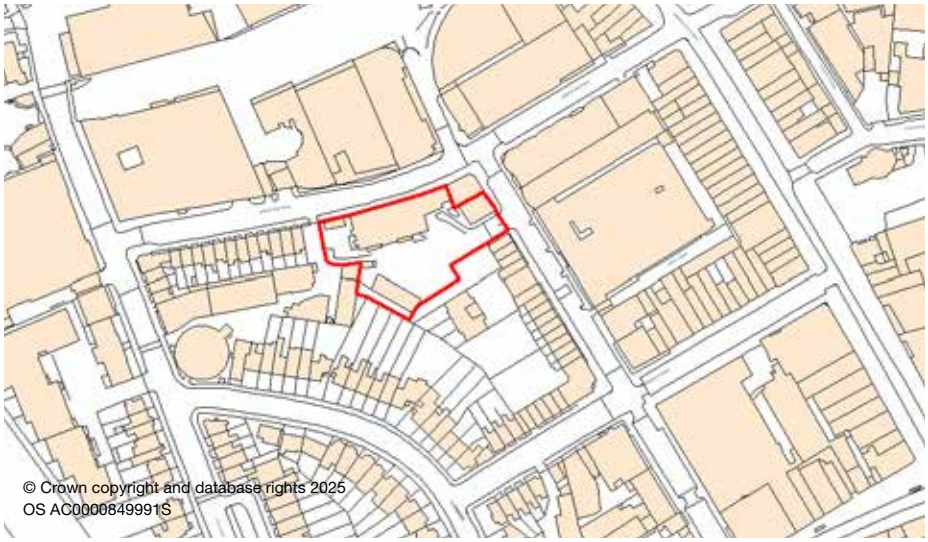
- The indicative capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- Proposals involving substantial demolition will be required 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).
- 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.
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk) as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Part of the site is also within a viewing corridor identified in the London View Management Framework SPG.

Allocation C19

Arlington Road former depot site

Key plan

Site plan



Address	211 Arlington Road, London, NW1 7HD and 33-35 Jamestown Road, NW1 7DB
Area	0.26 hectares
Allocated Use	Employment and permanent self-contained homes
Indicative Housing Capacity	63 additional self-contained homes
Description of Existing Site	The site is located on the corner of Arlington Road and Jamestown Road. The site is located immediately adjacent to Camden Town town centre.

Context

- The site was previously used by Camden Council as offices and a base for its street cleaning services.
- The depot buildings are generally low rise and have a functional appearance, commensurate with the former uses.

Allocation C19

Arlington Road former depot site

Development and Design Principles

Development must:

1. optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply). Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation);
2. be designed to ensure that the operation of future employment uses on the site are not compromised by the introduction of housing;
3. explore opportunities to create a more active and engaging street frontage along Arlington Road and Jamestown Road;
4. ensure it relates successfully to the existing public house on the corner of Arlington Road / Jamestown Road, which is a locally listed building, and avoid any adverse impact on its continuing operation;
5. be designed giving careful consideration to scale and massing due to the potential impact on designated conservation areas nearby and neighbouring occupiers; and
6. maximise the potential for urban greening, including new tree planting.

Other Considerations

- The indicative housing capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- 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).

4.13 The following table identifies further site allocations in the central area of the borough, all of which are either already subject to planning permission, or delivering 10 homes or less, and sets out key considerations for each site.

Table 5 | Further site allocations in Central Camden

Site Reference	Address	Allocated uses	Indicative Housing capacity	Key Considerations
C20	Highgate Centre, Highgate Road	Permanent self-contained homes, community use	47	Planning permission 2013/5947/P, dated 18/06/2014 (as amended by 2015/3151/P, 2016/0936/P, 2017/0363/P, 2017/0518/P and 2021/5384/P was approved and is under construction
C21	Grand Union House, 18 –20 Kentish Town Road	Employment (office), retail (ground floor) and permanent self-contained homes	6	The Council has resolved to grant planning permission (2021/0911/P) for 4000 sq m additional employment space and 6 homes. If this scheme does not come forward, then a contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2.
C22	Heybridge garages, Hadley Street	Permanent self-contained homes	10	Planning permission has been granted (2023/3595/P) for the demolition of the car parking podium to facilitate the delivery of new homes as part of the Council's small sites programme.

Table 5 (continued) | Further site allocations in Central Camden

Site Reference	Address	Allocated uses	Indicative Housing capacity	Key Considerations
C23	Bacton Low Rise, Haverstock Road	Permanent self-contained homes	148	Planning permissions (2012/6338/P dated 25/04/2013 (as amended by planning permissions 2014/3633/P, 2015/1189/P and 2016/5358/P) approved 314 homes in total. Phase 1 delivered 166 new and replacement homes. The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 40m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.
C24	52 - 54 Avenue Road	Permanent self-contained homes	12	Planning permission (2022/1863/P) granted with the delivery of 8 additional homes off-site at Canfield Place secured through a planning obligation.
C25	5-17 Haverstock Hill (Eton garages)	Permanent self-contained homes, retail uses	77	Planning permission 2016/3975/P has been granted and implemented as confirmed by 2021/3268/P certificate of lawfulness.
C26	160 Malden Road	Permanent self-contained homes, ground floor office	15	Planning permission (2024/1193/P) has been granted subject to signing a S106 agreement.
C27	Land adjacent to Constable House, Adelaide Road	Gypsy and Traveller accommodation		Gypsy and Traveller accommodation should be provided in accordance with Policy H11 (Accommodation for Travellers).

05

West Camden

05
Chapter

West Camden

5.1 The west of the borough includes the neighbourhoods of Kilburn, Fortune Green, West Hampstead, South Hampstead and Finchley Road/Swiss Cottage.

5.2 The area is predominantly residential in character, comprising a mixture of Victorian villas and terraces and post-war estates, with pockets of inter-war housing and more modern development.

5.3 Large parts of this area lie within conservation areas, and there are a number of listed and locally listed buildings.

Figure 14:

West Camden

Key

- Neighbourhood Centres
- Town Centres
- Open Spaces
- Conservation Area
- Railway Station
- Tube Station

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5.4 The area contains three town centres: Kilburn High Road, Finchley Road/Swiss Cottage and West Hampstead, in addition to several neighbourhood centres. These centres act as vibrant community hubs, providing retail and leisure uses, community facilities and employment uses.

5.5 Kilburn High Road is Camden's second largest town centre. It is divided by the busy A5 which forms the borough boundary between Camden and Brent. The east side of the town centre is in Camden and the west side is in Brent. Kilburn High Road has an offer which reflects its diverse community, with restaurants serving food from all around the world. It also has a lively night-time offer including restaurants, the Kiln Theatre and cinema, and performance and entertainment venues in its pubs. The centre is also home to a number of community uses, including Kilburn Library, and healthcare facilities.

5.6 Finchley Road/Swiss Cottage is the third largest town centre in the borough and runs either side of the busy A41 Finchley Road. This creates a barrier between the two sides of the centre, restricting pedestrian movement and creating a poor environment for visitors. The town centre has a significant convenience goods role, serving local needs and those from a wider catchment. The main retail offer is provided in the O2 Centre, which is allocated in this Plan for mixed-use redevelopment, including retail and leisure. The town centre is also home to several cultural, community and healthcare facilities, including Swiss Cottage Library, Hampstead Theatre, Swiss Cottage community centre, a cinema and the Swiss Cottage Leisure Centre.

5.7 West Hampstead is the smallest town centre in Camden and is characterised by independent shops, cafes and restaurants. The centre has a pleasant shopping environment and is popular with residents and visitors. The centre is also home to West Hampstead Library.

5.8 These town centres also serve a local economic function, providing secondary office accommodation, generally in small to medium premises. There are also clusters of industrial land around West Hampstead and Kilburn providing space for a variety of different uses.

5.9 The area has good public transport connections, with six mainline stations: West Hampstead Thameslink, West Hampstead Overground, South Hampstead Overground, Finchley Road and Frognal Overground, Kilburn High Road Overground and Brondesbury Overground; three underground stations: West Hampstead, Finchley Road and Swiss Cottage; and local bus routes. However, there are areas in the west of the borough, mainly around Fortune Green, that have lower levels of public transport accessibility.

5.10 Key areas of open space provision in the west of the borough include: Hampstead Cemetery, Fortune Green, Maygrove Peace Park, Kilburn Grange Park, Ainsworth Park and Swiss Cottage Open Space. In addition to this, there are five Sites of Importance for Nature Conservation (SINCs) in this area. These sites contribute to the borough's biodiversity and provide a focus for nature conservation activities. While most of the west of the borough is well served by open space, the areas of South Hampstead and Kilburn are comparatively less well served.

5.11 The west of the borough is covered, in part, by the Fortune Green and West Hampstead Neighbourhood Plan, which sets out the local community's aspirations and planning policies for that area. The Neighbourhood Plan is part of the Council's statutory development plan and is considered, alongside our own policies, when we make decisions on planning applications in that area. A Neighbourhood Area, which extends into Brent, has also been designated for Kilburn. The Neighbourhood Forum is in the process of preparing a Neighbourhood Plan for the area, with support from Camden and Brent Councils.

5.12 A number of opportunities exist in this area to deliver new homes, jobs and infrastructure to support Camden's communities, the most significant being on the site formed of the O2 Centre, associated car parking, other retail uses, and the builders merchant on Blackburn Road, where the opportunity exists to create a new neighbourhood providing a mix of uses including housing, complementary commercial and town centre uses, including retail, health and community facilities. The policy below sets out the Council's strategy for the west of the borough to guide the future development of the area. Information on key infrastructure programmes and projects in the west of the borough are set out separately in the Council's Infrastructure Delivery Plan.

Figure 15:

Key areas of development in West Camden

Key

- Key Areas of Development
- CIP Regeneration Schemes
- Open Spaces
- Town Centres
- Neighbourhood Centres

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Policy W1
West Camden

A. Development coming forward in the west of the borough will be expected to make a positive contribution to Camden's communities, to deliver social, economic and environmental benefits to residents in accordance with this Local Plan and, where relevant, Neighbourhood Plans.

New homes

B. Sites have been allocated in the west of the borough to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocation policies set out below.

C. The greatest concentration of development in the west of Camden will be the area between West End Lane and Finchley Road, which is currently occupied by the O2 Centre, other retail uses, associated car parking and a builder's merchant on Blackburn Road.

D. The O2 Centre site has the potential to become a vibrant and diverse new neighbourhood that integrates into the wider area and delivers a significant increase in the number of permanent self-contained homes; town centre uses including retail and leisure; health and community facilities; employment floorspace; and open space. Sites have been allocated here to deliver approximately 1,800 new homes. To deliver the Council's and community's visions and objectives for this area, we will expect development to be taken forward in accordance with the West End Lane to Finchley Road Supplementary Planning Document and the Fortune Green and West Hampstead Neighbourhood Plan.

E. The Council is committed to a programme of estate renewal and regeneration delivered through the Council's Community Investment Programme (CIP). The main focus of this work in the west of the borough is the Abbey Road Community Housing Site in Kilburn. Development coming forward in the west of the borough will be required to support the Council's estates mission set out in We Make Camden and assist with the delivery of the Council's priorities for nearby housing estates.

F. Where sites that are not allocated come forward for housing development in this area, these will be determined in accordance with the policies in this Plan.

Employment and the economy

G. New employment floorspace will be delivered in the west area of the borough through site allocations, existing planning permissions and the development of other sites.

H. The Council will manage and protect the stock of offices in the west of the borough. Proposals for small scale office provision will be supported in West Hampstead, Kilburn High Road and Finchley Road/Swiss Cottage town centres and neighbourhood centres in the area where this is of a commensurate scale for its location, in line with Policy IE2 (Offices).

I. The Council will continue to manage and protect the supply of industrial land in this area in line with Policy IE3 (Industry).

Policy W1
West Camden

Retail and town centres

J. The majority of new retail development in the west of the borough is expected to be delivered through the development of the O2 Centre site.

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).

Infrastructure

L. To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure, from appropriate development. The Council will work with relevant providers to secure the infrastructure needed to support development and provide the facilities needed for the area's communities. Key priorities for the west of the borough include:

1. the delivery of a new link / step free access into West Hampstead and Finchley Road underground stations to improve access and capacity;
2. the creation of attractive and safer walking, wheeling and cycling routes both into and through the area to deliver the priorities set out in the Council's Transport Strategy and Cycling Action Plan;
3. improvements to Kilburn High Road to deliver wider pavements and better street furniture; improved pedestrian crossings; new cycle lanes and safer crossings for cyclists; new pocket parks and planting; improvements to junctions; and changes to parking, waiting and loading;
4. improvements to the street environment and public realm particularly around the three West Hampstead stations and along West End Lane, Blackburn Road and Finchley Road, through measures such as tree planting, greening, biodiversity enhancements, improved crossings and wider pavements;
5. improving the interchange experience both between the three West Hampstead stations and in relation to the surrounding bus, pedestrian and cycle network;
6. the delivery of a new health centre and community facilities as part of the re-development of the O2 Centre site;
7. the delivery of new public open space as part of the re-development of the O2 Centre site;
8. the delivery of flood mitigation measures and sustainable drainage schemes;
9. the delivery of the Camden Green Network and wider greening and biodiversity enhancements;
10. the provision of infrastructure to support local energy generation;
11. delivering new and enhanced areas of public open space and play space, and improving access to nature, in line with Policy SC4 (Open Space); and
12. the roll-out of the Council's neighbourhood-based Safe and Healthy Streets schemes across this area, including reductions in through-traffic.

Site allocations

5.13 A number of site allocations are designated in the west of the borough. These are identified on the map below and listed Table 6.

Figure 16:

Site Allocations in West Camden

Key

Site Allocations

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Table 6 | Site allocations in west Camden

Site Reference	Previous Site Reference*	Site Name
W2	W2	O2 Centre, car park and car showroom sites and 14 Blackburn Road
W3	W3	11 Blackburn Road
W4	W4	13 Blackburn Road
W5	W5	188-190 Iverson Road
W6	W6	Land to rear of Meridian House, 202- 204 Finchley Road
W7	W7	Gondar Gardens Reservoir
W8	N/A	88 – 92 Kilburn High Road
W9	W8	Land at Midland Crescent, Finchley Road
W10	W9	104A Finchley Road
W11	W10	Abbey Co-Op Housing Site, Emminster and Hinstock
W12	W11	100 Avenue Road
W13	W13	551-557 Finchley Road
W14	W14	317 Finchley Road

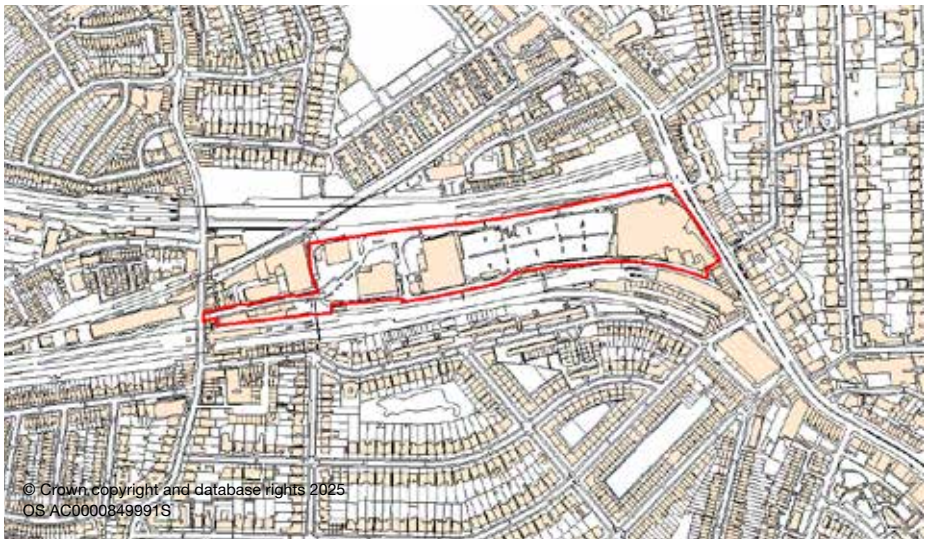
*Previous policy reference in the draft Local Plan 2024

Allocation W2

O2 Centre, car park, car showrooms and 14 Blackburn Road

Key plan

Site plan



Address	O2 Centre, car park, car showrooms and 14 Blackburn Road, West Hampstead, NW6
Area	5.7 hectares
Allocated Use	Mixed use development including permanent self-contained homes, town centre uses including retail and leisure uses, community uses, a health centre, employment and open space
Indicative Housing Capacity	1,800 additional homes
Description of Existing Site	The site comprises the O2 commercial centre, associated car parking, a retail warehouse and two car showrooms, which are all accessed from Finchley Road, and a builder's merchant on Blackburn Road accessed from West End Lane. The site is between railway lines to the north and south and Finchley Road to the east.

Context

- Most of the site is identified in the Fortune Green and West Hampstead Neighbourhood Plan as being part of the West Hampstead Growth Area and a key potential development site. Objectives for the site are set out in the Neighbourhood Plan and the Council's adopted West End Lane to Finchley Road Supplementary Planning Document (2021).
- The O2 Centre, car park and Homebase element of the site fall within the designated Finchley Road / Swiss Cottage town centre.
- The Council has granted planning permission for the redevelopment of the whole site (2022/0528/P), with delivery divided into three phases. The Council has granted full planning permission for the first phase of development (the former Homebase store and part of the existing car park) and outline permission for the two other phases, which will be subject to detailed reserved matters submissions.
- There is an extant planning permission for redevelopment at 14 Blackburn Road (PWX0202103) and a current application that proposes to amend the permitted scheme (2024/1145/P).

Allocation W2

O2 Centre, car park, car showrooms and 14 Blackburn Road

Development and Design Principles

Development must:

1. deliver a new place that responds to neighbouring areas and establishes its own identity as a new neighbourhood through excellent design and architecture in accordance with Policy D1 (Achieving Design Excellence);
2. be residential-led, providing a substantial number of permanent self-contained homes, affordable homes, and a mix of housing types, sizes and tenures, including a significant proportion of homes for families, in accordance with the housing policies in this Plan. The applicant will also be required to explore opportunities to deliver provision for older people, or other people with care or support requirements, as part of the overall affordable housing provision;
3. ensure that a comprehensive approach is taken to site design and layout, having regard to the West End Lane to Finchley Road Supplementary Planning Document, the Fortune Green and West Hampstead Neighbourhood Plan and the outline planning permission for the redevelopment of the site (2022/0528/P);
4. be taken forward in a coordinated way, working jointly with other landowners and neighbouring sites. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where delivery would take place before necessary infrastructure is delivered;
5. ensure new employment floorspace is designed to be accessible to a range of small to medium businesses;
6. ensure that new and/or reprovided town centre uses are focused towards Finchley Road / Swiss Cottage town centre;
7. make provision for leisure uses on site, including a cinema. Any new retail or leisure uses must be provided in accordance with Policy IE6 (Supporting Designated Centres and Essential Services);
8. contribute towards the provision of new, and/or the improvement of existing, community facilities and services to meet increased resident needs in accordance with Policy SC3 (Social and Community Infrastructure);
9. include the provision of free, publicly-accessible toilets, suitable for a range of users, including changing places toilets, and free drinking water;
10. ensure that all car parking provision, except for spaces for disabled people, essential users and car clubs, is removed;
11. ensure that the design and layout of the site gives priority to the movement of pedestrians, people using wheelchairs, cyclists and public transport over the operational, servicing and parking demands of private vehicles;
12. include new and improved public realm and public open spaces that are fully accessible to residents, workers, visitors and the wider community. These should be of different forms and functions, related to the location and the uses and activities they serve; and
13. enhance biodiversity on-site, contribute to the enhancement of the adjacent Site of Nature Conservation along the railway lines and deliver urban greening measures on the site in accordance with Policy NE2 (Biodiversity).

The Camden Building Heights Study has identified this site as a location where tall buildings may be an appropriate form of development, with 9m - 54m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies. The Council has granted planning permission for a development ranging in height from 33 - 61m. That decision was based on an assessment of the impacts and benefits of the specific development proposal, and it should not be assumed that the permitted heights would necessarily be appropriate for any subsequent development.

Allocation W2

O2 Centre, car park, car showrooms and 14 Blackburn Road

Infrastructure Requirements

Development must:

14. contribute to the delivery of new links / step free access into West Hampstead and Finchley Road underground stations and provide appropriate financial contributions to support access and capacity improvements at these stations;
15. deliver a strong, convenient, direct, safe and accessible east-west route linking Finchley Road with West End Lane, including substantial improvements to the western end of Blackburn Road cul-de-sac. This route should be accessible to all, welcoming, safe, green, well-lit, overlooked and inclusive to meet the needs of pedestrians, people using wheelchairs, and cyclists, rather than motor vehicles;
16. be supported by a Bus Infrastructure Plan to deliver improvements to bus stop facilities both within, and in the vicinity of, the site;
17. incorporate pedestrian, cycling and environmental improvements to ensure the development is fully integrated with, and accessible to, the wider area;
18. make provision for a new NHS health centre;
19. contribute towards securing physical improvements to Billy Fury Way and Granny Dripping Steps to improve access into the site;
20. secure walking and cycling improvements to Finchley Road, including the provision of an enhanced surface level crossing and improvements to the junction with Blackburn Road;
21. provide infrastructure to support local energy generation on site and/or connections to existing or future networks where feasible;
22. contribute towards bus priority and cycle infrastructure improvements along West End Lane; and
23. improve the Blackburn Road and West End Lane junction.

Other Considerations

- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding and parts of the site have experienced problems with flooding in the past. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- Sustainable Drainage Systems will be required on this site in accordance with Policy CC11 (Sustainable Drainage).
- Applicants will be expected to liaise with Thames Water throughout the phased design process to investigate whether the existing water supply 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.
- 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).
- An integrated servicing and vehicle access strategy that does not detrimentally impact the quality of walking and cycling routes, spaces and public realm must be provided in accordance with Policy T6 (Sustainable Movement of Goods, Services and Materials) and A1 (Protecting Amenity).

Allocation W3

11 Blackburn Road

Key plan

Site plan

Address	11 Blackburn Road, West Hampstead, NW6 1RZ
Area	0.15 hectares
Allocated Use	Permanent self-contained homes and employment
Indicative Housing Capacity	24 additional homes
Description of Existing Site	The site is accessed from a driveway from Blackburn Road and is adjacent to Billy Fury Way. There are two warehouse buildings on site in use as artist studios; one is a Victorian warehouse and the other a 20th Century building.

Context

- The site is identified in the Fortune Green and West Hampstead Neighbourhood Plan as being part of the West Hampstead Growth Area, and a potential development site. Objectives to guide the development of this site are set out in the Council's adopted West End Lane to Finchley Road Supplementary Planning Document (2021) and the Neighbourhood Plan.
- Planning permission (2015/3148/P) was previously granted for the refurbishment of the Victorian warehouse for employment use and the provision of six three-bedroom houses.

Allocation W3

11 Blackburn Road

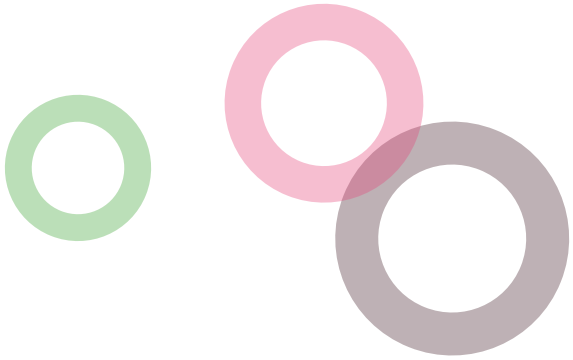
Development and Design Principles

Development must:

1. be taken forward in a co-ordinated way, working jointly with the developers of neighbouring sites. The Council will resist schemes that prejudice the future development and design quality of neighbouring development sites;
2. prioritise the retention of the Victorian warehouse building (which is a non-designated heritage asset), as it is considered to be of high architectural quality and worthy of retention;
3. censure that a design-led approach is taken to delivering the optimum amount of development on the site. Where demolition is proposed, this should be justified in accordance with Policy CC2 (Retention of Existing Buildings);
4. ensure there is no net loss of employment floorspace on site and seek to incorporate space that is accessible to a range of small to medium businesses; and
5. explore design options to address safety and access issues on Billy Fury Way to increase natural surveillance and make it a more attractive and useable space. This should include setting back buildings, path widening, improved lighting, the creation of active frontages and improving natural surveillance, for example from windows, front doors and balconies over the space.

Other Considerations

- 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).

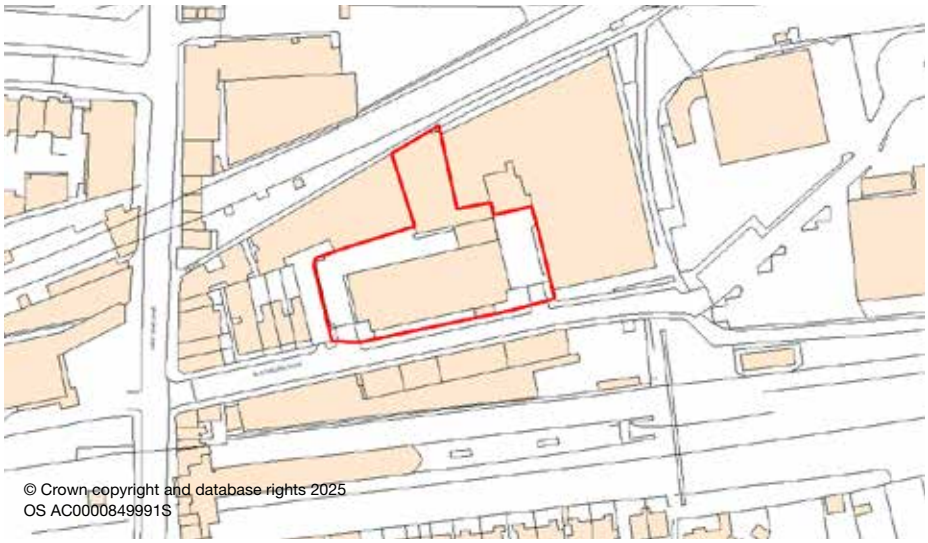


Allocation W4

13 Blackburn Road

Key plan

Site plan



Area	0.24 hectares
Allocated Use	Permanent self-contained homes and employment (offices)
Indicative Housing Capacity	24 additional homes
Description of Existing Site	The site consists of the Clockwork Factory, a part single, part two and three storey former office space that was converted to housing, together with a single storey office building. There are 29 existing flats on site. The building fronts onto Blackburn Road and backs onto Billy Fury Way and railway tracks.

Context

- The site is identified in the Fortune Green and West Hampstead Neighbourhood Plan as being part of the West Hampstead Growth Area and a potential development site. Objectives to guide the development of this site are set out in the adopted West End Lane to Finchley Road Supplementary Planning Document (2021) and the Neighbourhood Plan.
- The Council has resolved to grant planning permission (2020/2940/P) for a mixed-use development, comprising 53 homes and commercial floorspace. If this application is not granted, or the permission is not implemented, the criteria set out below will apply to any future applications on this site.

Allocation W4

13 Blackburn Road

Development and Design Principles

Development must:

1. be taken forward in a co-ordinated way, working jointly with the developers of neighbouring sites. The Council will resist schemes that prejudice the future development and design quality of neighbouring development sites;
2. not result in a reduction of the amount of existing residential floorspace on site;
3. provide permanent self-contained and affordable homes, and a mix of unit sizes, including the provision of larger sized residential units, in accordance with Policy H7 (Large and Small Homes);
4. ensure that new employment floorspace is designed to be accessible to a range of small to medium businesses;
5. include the provision of an active frontage along Blackburn Road to enliven the street, and maximise the pavement widths, where possible; and
6. explore design options to address safety and access issues on Billy Fury Way, to increase natural surveillance and make it a more attractive and useable space. This should include setting back buildings, path widening, improved lighting, the creation of active frontages and improving natural surveillance, for example from windows, front doors and balconies over the space.

Other Considerations

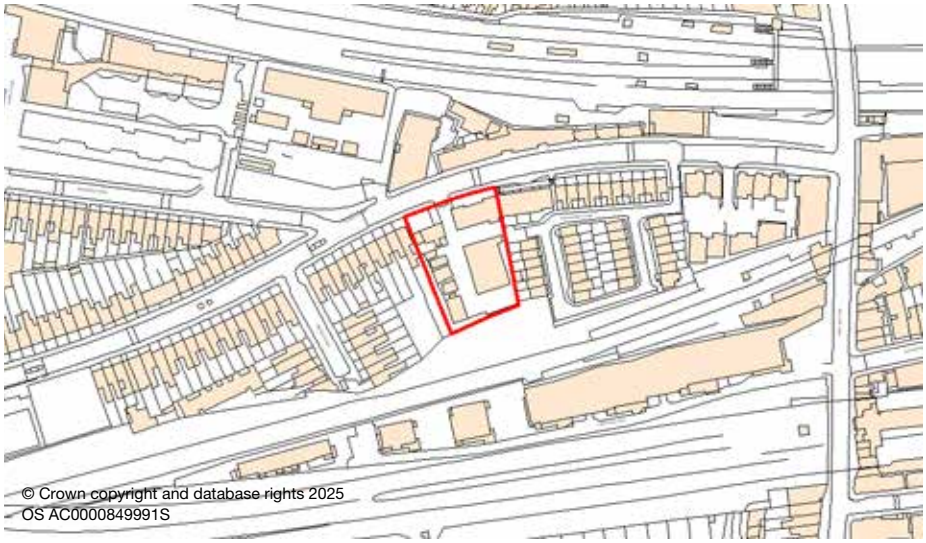
- Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).

Allocation W5

188 – 190 Iverson Road

Key plan

Site plan



Address	188- 190 Iverson Road, West Hampstead, NW6 2HL
Area	0.26 hectares
Allocated Use	Permanent self-contained homes, offices and light industrial
Indicative Capacity	17 additional homes
Description of Existing Site	This site is occupied by C Tavener and Son, who provide building and joinery services, storage and furniture paint spraying facilities. The uses are contained in a number of single-storey buildings across the site, together with a two-storey office building and a single-storey office block fronting on to Iverson Road. Adjacent to the site are three and four storey residential properties and to the south is a designated open space (which is also designated as a Site of Nature Conservation Importance and Local Green Space) and railway lines.

Context

- The site is within the Fortune Green and West Hampstead Neighbourhood Plan area.
- This site is allocated for the delivery of additional homes to the front of the site. The re-development of the whole site is not envisaged.

Allocation W5

188 – 190 Iverson Road

Development and Design Principles

Development must:

1. ensure there is no net loss of employment floorspace on site, recognising that development offers the opportunity to consolidate, enhance and intensify the employment floorspace provision, given the low-level nature and number of buildings currently provided, subject to there being no detrimental impact on adjacent residential properties;
2. be designed to ensure that the operation of existing, or future, employment uses on the site are not compromised by the introduction of housing;
3. maintain a suitable vehicular access and turning space to ensure that the operation of existing, or future, employment uses on the site are not compromised;
4. be designed to ensure that new housing provision is located on the Iverson Road frontage;
5. be designed and operated to ensure there is no direct, or indirect, impact on the designated open space (Medley Orchard) to the south of the site, which is also a Grade I Site of Importance for Nature Conservation (SINC) and Local Green Space;
6. deliver biodiversity enhancements to the border of the site, in accordance with Policy NE2 (Biodiversity); and
7. seek to retain the mature street trees along the frontage of the site with Iverson Road in accordance with Policy NE3 (Tree Planting and Protection).

Other Considerations

- The indicative housing capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).

Allocation W6

Land to the rear of Meridian House, 202 – 204 Finchley Road

Key plan

Site plan

Address	Meridian House, 202- 204 Finchley Road, NW3 6BX
Area	0.35 hectares (whole site)
Allocated Use	Permanent self-contained homes, light industrial and offices
Indicative Housing Capacity	15 additional homes
Description of Existing Site	Meridian House is a five-storey building fronting onto the Finchley Road, with commercial uses on the lower floors and residential on the upper floors. The rear of the building has been extended in the past to provide a two-storey commercial building. To the side and rear of the buildings is a large parking area. Beyond this is a former caretaker's house, situated in the northeast corner of the site, adjacent to which is a copse of trees, protected by a Tree Preservation Order.

Context

- The site is adjacent to, but not within, Swiss Cottage / Finchley Road town centre and the Redington Frognal Conservation Area. It is next to a locally listed terrace.
- The site is identified as a potential redevelopment site in the adopted Redington and Frognal Neighbourhood Plan (2021).
- This site is allocated for the delivery of additional housing on the land to the rear of the site, where the former caretaker's cottage is situated.
- The re-development of other parts of the site is not envisaged and would need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- The site is subject to an Article 4 direction that means any change of use of the employment floorspace requires planning approval.

Allocation W6

Land to the rear of Meridian House, 202 – 204 Finchley Road

Development and Design Principles

Development must:

1. be designed to ensure that the operation of existing, or future, employment uses on the site are not compromised by the introduction of additional housing;
2. ensure that the trees in the wooded copse within the site, which are subject to a TPO, are protected and sensitively integrated into any redevelopment. There are also protected trees on adjacent sites that will need to be sensitively considered as part of any development, in accordance with Policy NE3 (Tree Planting and Protection);
3. ensure that if the comprehensive redevelopment of the whole site is considered appropriate, there is no net loss of employment floorspace on the site; and
4. ensure that where employment floorspace is re-provided, this is designed to be accessible to a range of small to medium businesses.

Other Considerations

- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding and parts of the site have experienced problems with flooding in the past. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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).

Allocation W7

Gondar Gardens Reservoir

Key plan

Site plan

Area	1.24 hectares
Allocated Use	Permanent self-contained homes and/or specialist care home
Indicative Housing Capacity	30 additional homes
Description of Existing Site	The site forms a long rectangle, bounded on three sides by the rear gardens of terraced houses and with an unbuilt frontage along Gondar Gardens. The site contains a decommissioned reservoir, which comprises a vaulted brickwork structure, supported on brick piers, and perimeter walls, mostly buried in the ground or contained within a grassed embankment. The reservoir is identified on the Local List.

Allocation W7

Gondar Gardens Reservoir

Context

- A significant proportion of the site is designated as open space and as a Site of Importance for Nature Conservation (SINC).
- The site is also identified in the Fortune Green and West Hampstead Neighbourhood Plan as a Local Green Space.
- The Fortune Green and West Hampstead Neighbourhood Plan outlines a number of priorities for this site, including the retention of open space, with managed access; maintaining suitable conditions for biodiversity; protecting views across the site; and that any future development should match the character of the local area.
- Since the reservoir was decommissioned there have been several proposals for the development of the site. Although all were refused by the Council, two were allowed at appeal (2011/0396/P and 2013/7585/P). The proposals allowed on appeal therefore establish the principle of, and some parameters for, development on the site.
- Whilst the (lapsed) previous permissions allowed at appeal are acknowledged, the Inspector's decision dismissing the last appeal (2017/6045/P) concluded that previous permissions should not be relied on as compelling precedents, particularly for the footprint and scale of development.
- A housing-led development is considered the most appropriate use for this site and the housing capacity has been informed by the previous applications and appeal decisions (see applications listed above in addition to 2012/0521/P and 2017/6045/P).
- The importance of the perception of open space that the site provides and its value for the neighbouring properties, as well as the street, has been acknowledged in previous appeals and is a key part of the Neighbourhood Plan vision for the site, which this allocation supports.

Allocation W7

Gondar Gardens Reservoir

Development and Design Principles

Development must:

1. be focused on the un-designated area of the site, to protect the designated open space, SINC and Local Green Space;
2. seek to optimise residential provision on site. If provision is made for a residential care home, this must meet the needs of borough residents in accordance with Policy H8 (Housing for older people, homeless people and other people with care or support requirements);
3. include measures to enhance the designated open space, SINC and Local Green Space on the site in accordance with Policy SC4 (Open Space) and ensure there is no harm to existing habitats and protected species on the site in accordance with Policy NE2 (Biodiversity);
4. be designed to protect views across the site from harm or loss, in particular, the view to the east towards Hampstead; and
5. be designed to establish clearly defined entrances on the Gondar Gardens street frontage to ensure the development actively contributes towards the street scene.

Other Considerations

- 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).

Allocation W8

88-92 Kilburn High Road, Kilburn

Key plan

Site plan

Address	88 – 92 Kilburn High Road, Kilburn, NW6 4HS
Area	0.21 hectares
Allocated Use	Permanent self-contained homes and retail (or Class E)
Indicative Housing Capacity	21 additional homes
Description of Existing Site	The site is located on Kilburn High Road and West End Lane. On the frontage with Kilburn High Road is a four-storey terrace, including retail (Sainsburys) at ground floor level, with offices and three residential units above. The retail store extends towards the rear of the site, with servicing undertaken from West End Lane via a small undercroft service yard. The middle part of the site, occupied by the retail store, is two storeys in height. The frontage with West End Land comprises a four-storey building, with the upper levels set back from the road, previously used for office support to the retail store. The three homes located on the Kilburn High Road frontage at the upper levels are accessed via a passage from Kilburn High Road. To the north, south and west of the site are other town centre uses, to the east of the site are residential properties along West End Lane.

Context

- The site is located within Kilburn Town Centre.
- The site is within the Kilburn Neighbourhood Area. The Neighbourhood Forum are in the process of preparing a Neighbourhood Plan for the area.

Allocation W8

88-92 Kilburn High Road, Kilburn

Development and Design Principles

Development must:

1. be a mixed-use development, with the commercial use fronting Kilburn High Road to support the town centre;
2. be designed to allow the co-location of housing with other proposed uses, ensuring that non-employment uses do not compromise the operation of existing or future employment uses;
3. ensure that essential operational or servicing needs are maintained in relation to the retail element in accordance with Policy T5 (Parking and Car-free Development);
4. be designed to provide an active frontage to West End Lane, where possible; and
5. ensure the amenity of the residential properties is protected in accordance with Policy A1 (Amenity).

Other Considerations

- The indicative housing capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified 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).
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.

5.14 The following table identifies further site allocations in the west area of the borough which are already subject to planning permission and sets out key considerations for each site.

Table 7 | Further site allocations in West Camden

Site Ref	Address	Allocated use	Indicative housing capacity	Key considerations
W9	Land at Midland Crescent / Finchley Road	Mixed use including permanent self- contained homes, student housing and town centre uses	9 additional homes and 60 student rooms or equivalent residential floorspace	Planning permission (2014/5527P) has been granted and initial works commenced, so the permission remains extant. If a new scheme comes forward, a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified as being at risk of flooding.
W10	104A Finchley Road	Mixed use including commercial and permanent self-contained homes	31	The Council has resolved to grant planning permission (2022/3553/P), subject to a S106 agreement, for a mixed-use development comprising commercial, education and permanent self-contained homes.
W11	Abbey Co-op Housing site, Emminster and Hinstock	Permanent self-contained homes and flexible commercial units within Use Class E	65	Phases 1 and 2 of the Abbey Co-op estate regeneration have been completed. Planning permission (2022/2542/P) has been granted for phase 3 of the scheme and works have started on site.
W12	100 Avenue Road	Permanent self- contained homes, ground floor town centre uses and community use	184	Planning permission (2014/1617/P) was granted on appeal and works have commenced. The Camden Building Heights Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 63m considered the potentially appropriate height range. Planning permission was granted for a development up to 82m. That decision was based on the impacts and benefits of that specific scheme, and it should not be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.
W13	551-557 Finchley Road	Permanent self-contained homes and flexible commercial uses	15	Planning permission (2020/5444/P) has been granted for a mixed use scheme of residential and flexible commercial use.
W14	317 Finchley Road	Permanent self-contained homes and flexible commercial uses	22	Planning permission (2016/2910/P) has been granted for a mixed use scheme including permanent self-contained homes and flexible commercial uses to ground and lower floors. The scheme is under construction.

06

North Camden

06
Chapter

North Camden

6.1 The north of the borough includes the neighbourhoods of Hampstead, Highgate and Frognal and is characterised by its striking topography, rich heritage, distinct character and unique open spaces.

6.2 The area is predominantly residential in character, with a mix of large and small homes, often with generous gardens, situated on leafy streets.

6.3 It is also covered, almost entirely, by a number of designated Conservation Areas, containing hundreds of listed buildings of architectural and historic interest.

Figure 17:

North Camden

Key

- Neighbourhood Centres
- Town Centres
- Open Spaces
- Conservation Area
- Railway Station
- Tube Station

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6.4 Hampstead is the main town centre in the north of the borough. It provides a high-quality retail and leisure offer, with a range of independent, boutique and niche shops catering both for local residents and visitors. The centre also serves a local economic function, providing secondary office accommodation, generally in small to medium premises. The history of the town, its attractive 'village' environment, conservation area designation and proximity to Hampstead Heath draw a significant number of tourists to visit the town centre. As a result, there is a strong café and restaurant offer, in addition to a cinema primarily serving the local community. There are also a number of neighbourhood centres in the north of the borough providing a more local shopping role, including Highgate High Street, which is on the boundary between Camden and Haringey.

6.5 The north of the borough has the lowest levels of public transport accessibility in Camden and is mainly served by a number of local bus routes, with the main rail and underground services being Hampstead Heath Overground Station and Hampstead Underground Station, with Gospel Oak Overground Station and Tufnell Park, Archway and Highgate Underground Stations located nearby.

6.6 A key feature of the north area is Hampstead Heath, the largest open space in the borough, providing nearly half of Camden's total area of open space and many sporting facilities. Hampstead Heath is protected by a number of designations and contains the only Ancient Woodland and Ancient Monument in the borough. The Heath's elevated position above most of Greater London affords expansive views across the city, with four protected viewing corridors originating in this area. Other notable open spaces in the north of the borough include Highgate Cemetery and Waterlow Park. However, despite the abundance of open space in the area, Dartmouth Park and Frognal remain comparatively less well served by public open space.

6.7 In terms of community provision, the north of the borough is served by two libraries in Highgate and Hampstead (the Keats community library) and several community centres. Hampstead also has a very high concentration of schools where significant issues exist concerning the 'school run'. Any further applications for schools in this area will be determined in accordance with Policy SC3 (Social and Community Infrastructure).

6.8 The north of the borough is covered by four adopted Neighbourhood Plans: the Hampstead Neighbourhood Plan, the Highgate Neighbourhood Plan, the Redington and Frognal Neighbourhood Plan and the Dartmouth Park Neighbourhood Plan, which set out the community's aspirations and planning policies for their area. These Plans are part of the Council's statutory development plan and are considered, alongside our own policies, when planning applications in these areas are assessed.

6.9 Given the established historic character of the area and lack of development sites, opportunities to deliver new homes, jobs and infrastructure in the north of the borough to support Camden's communities are limited. The policy below sets out the Council's strategy for the North of the borough to guide the future development of this area. Information on key infrastructure programmes and projects in the North of the borough are set out separately in the Council's Infrastructure Delivery Plan.

Policy N1

North Camden

A. Development coming forward in the north of the borough will be expected to preserve and, where appropriate, enhance the historic character of the area, in addition to delivering benefits to residents to meet the needs of Camden's communities in accordance with this Local Plan and, where relevant, the Highgate, Hampstead, Dartmouth Park, and Redington and Frognal Neighbourhood Plans.

B. Sites have been allocated in the north of the borough to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocation policies set out below.

C. Where sites that are not allocated come forward for housing development in this area, these will be determined in accordance with the policies in this Plan.

Employment and the economy

D. The Council will manage and protect the stock of offices in the north of the borough. Proposals for small scale office provision will be supported in Hampstead town centre and neighbourhood centres in this area where this is of a commensurate scale for its location, in line with Policy IE2 (Offices).

Policy N1

North Camden

Retail and town centres

E. The Council will continue to support and protect Hampstead Town Centre and the Neighbourhood Centres in the north of the borough, to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors in line with the policies set out in this Plan, with any additional retail provision to be provided in accordance with Policy IE6 (Supporting Designated Centres and Essential Services).

Infrastructure

F. To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure from appropriate development. The Council will work with relevant providers to secure the infrastructure needed to support development and provide the facilities needed for the area's communities. Key priorities for the north of the borough include:

1. the Council's neighbourhood-based Safe and Healthy Streets schemes, delivering through-traffic reduction and other Healthy Streets measures in accordance with the Camden Transport Strategy;
2. extensions to the Camden cycle network in accordance with the Council's Cycling Action Plan;
3. the delivery of an Integrated Care Hub;
4. the delivery of the Camden Nature Corridor, which aims to deliver a nature rich green corridor from Hamsptead Heath into Kentish Town as part of the wider Camden Green Network;
5. open space, greening and biodiversity enhancements; and
6. the delivery of flood mitigation measures in Hampstead Heath and South End Green.

Site allocations

6.10 Three site allocations are designated in the north of the borough. These are identified on the map below and listed in Table 8.

Figure 18:

Site Allocations in North Camden

Table 8 | Site Allocations in North Camden

Site Reference	Previous Site Reference*	Site Name
N2	N2	Former Mansfield Bowling Club
N3	N3	Queen Mary's House
N4	N4	Hampstead Delivery Office

*Previous policy reference in the draft Local Plan 2024

Allocation N2

Former Mansfield Bowling Club

Key plan

Site plan

Address	Former Mansfield Bowling Club, Croftdown Road, Highgate, NW5 1EP
Area	0.85 hectares
Allocated Use	Permanent self-contained homes / or specialist care home, open space and sports facilities
Indicative Housing Capacity	23 additional homes
Description of Existing Site	The former Mansfield Bowling Club site is in a residential neighbourhood within the Dartmouth Park Conservation Area. Its former use was as a private bowls club. Part of the site is designated as private open space and tennis courts are also provided on the site.

Context

- The site is covered by the Dartmouth Park Neighbourhood Plan, which identifies it as a 'specific neighbourhood site' and designates part of it as a Local Green Space.
- In January 2017 planning permission was granted on appeal for 21 new dwellings, a new public space, enhanced tennis facilities and an ancillary sports pavilion (2015/1444/P). This permission was later varied through changes to the layout and mix, within the proposed buildings, to include two additional dwellings (2018/1701/P). Initial work to implement the planning permission has taken place.
- A subsequent planning application 2022/5320/P has also since been submitted for a residential care home, open space and three tennis courts.

Allocation N2

Former Mansfield Bowling Club

Development and Design Principles

Development must:

1. seek to optimise residential provision on site. If provision is made for a residential care home, this must meet the needs of borough residents in accordance with Policy H8 (Housing for Older People, Homeless People and Other People with Care or Support Requirements);
2. make provision for a new public open space; enhanced tennis facilities; and an ancillary sports pavilion on-site. New sport/ leisure facilities should be provided in accordance with Policy SC3 (Social and Community Infrastructure) and new public open space should be provided in accordance with Policy SC4 (Open Space);
3. be designed to integrate into the surrounding area and mitigate any impact on the adjacent designated open space and local green space; and
4. seek to protect existing trees on-site in accordance with Policy N3 (Tree Planting and Protection).

Infrastructure Requirements

Development must:

5. include the reconfiguration and extension of the tennis courts to provide an additional court and increased playing area consistent with the previous approved planning applications and Lawn Tennis Association requirements.

Other Considerations

- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk) as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- The Ecology Report submitted with the 2015 planning application identified that bats were present on the site. A bat mitigation strategy will therefore be required and any application will be assessed against Policy NE1 (Natural Environment) and Policy NE2 (Biodiversity).
- 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).

Allocation N3

Queen Mary's House

Key plan

Site plan

Address	Queen Mary's House, 124 Heath Street, Hampstead, NW3 1DU
Area	0.60 hectares
Allocated Use	Permanent self-contained homes
Indicative Housing Capacity	98 self-contained homes
Description of Existing Site	The site is bounded by East Heath Road to the north, Heath Street to the west, residential homes to the south and south-east and Horton Road to the east. Queen Mary's House was built in the 1920s and is considered to be of historical significance. Much of the wall on Heath Street is Grade II listed.

Context

- The site is within the Hampstead Conservation Area. It is also within the Hampstead Neighbourhood Plan area and is referenced in the update to the Hampstead Neighbourhood Plan.
- It is understood that the site was in hospital use (former C2 residential institution use class) and provided key worker accommodation until 2012. It was then used for a variety of administrative functions, for various health services, and for key worker accommodation associated with the Royal Free Hospital (53 single bedrooms, shared bathroom and kitchen facilities and one self-contained unit).

Allocation N3

Queen Mary's House

Development and Design Principles

Development must:

1. retain the original Queen Mary's House building taking into account its historical interest;
2. retain, or reprovide, at least an equivalent amount of affordable housing floorspace to the existing;
3. seek to protect existing trees on-site in accordance with Policy NE3 (Tree Planting and Protection); and
4. retain the listed wall on Heath Street.

Other Considerations

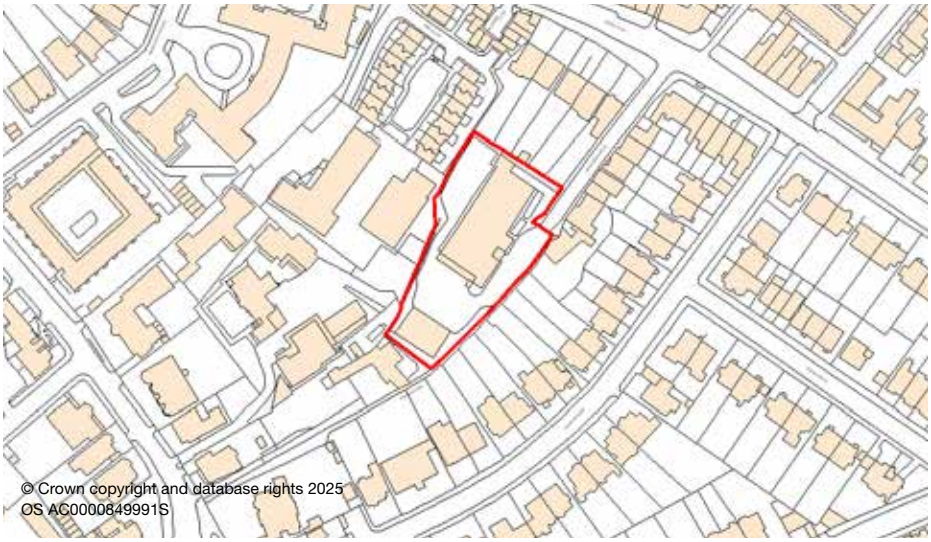
- The indicative housing capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings).
- This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.
- A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.
- 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.

Allocation N4

Hampstead Delivery Office

Key plan

Site plan



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Address	Hampstead Delivery Office; Shepherds Walk, NW3 5UF
Area	0.35 hectares
Allocated Use	Permanent self-contained homes
Indicative Housing Capacity	45 additional homes
Description of Existing Site	The site is bounded by residential uses and a school to the rear of the site. The site is located at the south-western end of Shepherd's Walk and comprises a primarily two-storey 1950s building, with a service yard for delivery vehicles, and a parking area. Spring Walk runs along the south of the site as a pedestrian walkway connecting to Fitzjohns Avenue. The site currently operates as a Royal Mail Delivery Office.

Context

- The site is within the Fitzjohns/Netherhall conservation area and the Hampstead Neighbourhood Plan area and is referenced in the update to the Hampstead Neighbourhood Plan.

Allocation N4
Hampstead Delivery Office

Development and Design Principles

Development must:

1. ensure that a design-led approach is taken to delivering the optimum amount of development on the site, and that, where demolition is proposed this should be justified in accordance with Policy CC2 (Retention of Existing Buildings);
2. be designed to successfully integrate into the surrounding area; and
3. provide an active frontage to, and improve the pedestrian walkway, known as Spring Walk, that runs along the southern boundary of the site.

Other Considerations

- 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).
- This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.

07

Meeting Housing Needs

07
Chapter

Maximising Housing Supply

7.1 The Council recognises that housing is vitally important to nearly every aspect of people's lives and that everyone deserves a safe and affordable place they call home.

7.2 However, housing in Camden is some of the most expensive to rent and buy in the UK, and there are not enough truly affordable homes for everyone.

7.3 The shortage of decent and affordable housing of all types and tenure is leading to people moving out of Camden – and many people who have grown up in the borough cannot afford to stay, especially when they start a family.

7.4 These issues also mean that some people and families are living in overcrowded and poor quality housing, which has a detrimental impact on mental and physical health, well-being, education and more. A disproportionate number of Camden families living in these conditions are from Black, Asian, or other ethnic communities.

7.5 We also know how important it is to ensure that all older people, disabled people, and other people with care or support requirements have accessible and appropriate housing that meets their needs, to promote health and well-being and a good quality of life.

7.6 To tackle these issues, we need to ensure that there is a sufficient supply of new homes in the borough to meet the needs of Camden's diverse communities, both now and in the future.

7.7 The Local Plan aims to deliver 11,550 additional homes (770 homes per year) in Camden over the Plan period 2026/27 to 2040/41. This target has been derived in accordance with the guidance in the London Plan, and includes the final three years of Camden's target for 2019/20 to 2028/29 from the London Plan, plus the anticipated backlog against this target at the start of the Local Plan period. Further information on the target and how new homes will be delivered in Camden are set out in Chapter 2 - Development Strategy. The Council recognises that work has commenced on review of the London Plan 2021 with a view to its replacement in 2027, and the replacement London Plan will set a new housing target for Camden.

7.8 Policy H1 sets out how the Council will seek to maximise housing supply in Camden over the Plan period, with subsequent policies providing guidance on the delivery of affordable housing and the mix of sizes and types of homes that are needed to meet the needs of particular groups of people.

Policy H1
Maximising Housing Supply

A. The Council will aim to deliver at least 11,550 additional homes from 2026/27 to 2040/41.

B. The Council will seek to secure a sufficient supply of homes to meet the needs of existing and future households in Camden to and meet or exceed the above housing target by:

1. regarding permanent self-contained housing as the priority land-use of the Local Plan;
2. supporting other forms of permanent housing to meet more specific needs, such as purpose-built student accommodation and housing for people with care or support requirements;
3. working to return vacant homes to use and ensure that new homes are occupied;
4. resisting the further development in Camden of housing for use as short-term lets, unless it can be demonstrated to the Council's satisfaction that the site is unsuitable for the provision of any form of permanent housing;
5. where sites are identified for development of permanent housing (particularly permanent self-contained housing) through a current planning permission or in a development plan, resisting development for an alternative use (other than a short-term meanwhile use compatible with subsequent permanent housing development), unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for the identified form of permanent housing, or (in the case of non-housing proposals) for any alternative form of permanent housing;
6. where sites are underused or vacant, expecting the optimum provision of permanent housing (giving priority to permanent self-contained housing), unless it can be demonstrated to the Council's satisfaction that the site is unsuitable for the provision of permanent housing, or has no realistic prospect of timely development for permanent housing; and
7. optimising the homes delivered on each site by using a design-led approach, in accordance with policies for design and heritage in the London Plan and the Local Plan, including any relevant space standards, to achieve the maximum reasonable provision of housing that is compatible with any other uses needed on the site.

C. We will monitor the delivery of additional housing against the housing target and seek to maintain supply at the rate necessary to meet the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or rental value of different house types and tenures, and the needs of different groups.

7.9 Housing development coming forward in Camden will be expected to be in conformity with the housing policies in this Plan and proposals should also be designed having regard to:

- other relevant policies throughout the Local Plan, particularly those on Design and Heritage, Amenity, Climate Change and Transport;
- Camden Planning Guidance, particularly documents on Design, Housing, Sustainability, Amenity, and Transport;
- The London Plan and Supplementary Planning Guidance / London Planning Guidance (SPGs/ LPGs) issued by the Mayor of London;
- Building for Life - the industry and government endorsed standard for well designed homes and neighbourhoods.

The meaning of "permanent self-contained housing"

7.10 Self-contained houses and flats are defined as homes where all the rooms, including the kitchen, bathroom and toilet, are behind a door that only one household can use (2021 Census Glossary of Terms). The term "permanent" is used to refer to housing where people live long-term (i.e. for periods of nor less than 90-days) and is used to distinguish such housing from short-term lets or visitor accommodation. In Policy H1 and associated paragraphs, we have referred to permanent housing or permanent self-contained housing wherever the context makes this appropriate. In other parts of the Local Plan, we have not sought to insert the word "permanent" in every reference to housing or homes, but have included it when it is necessary to make policy requirements clear, such as when specifying the allocated use of a site.

7.11 In most cases permanent self-contained homes fall in Use Class C3, however the Council will also regard the following as self-contained homes when applying Local Plan policies and monitoring housing delivery:

- houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (small houses in multiple occupation or HMOs, in Use Class C4, but can change to Use Class C3 without a planning application under the freedom provided in legislation); and
- self-contained homes provided in conjunction with another use, notably live/ work units, which are homes with a dedicated work area (not in any planning use class, but we will treat them as Use Class C3 when we apply Local Plan policies).

The priority given to permanent self-contained housing

7.12 The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Self-contained housing is prioritised relative to other forms of housing because it offers the greatest flexibility to accommodate a wide variety of household types, and the best prospect of delivering affordable housing in the context of very high affordable housing need from households with very limited incomes. The following paragraphs provide further details.

7.13 The majority of Camden's residents live in self-contained homes, as part of a household, or as single person households. This includes people living in multi-adult households, such as groups of friends and flat shares. Self-contained homes have the greatest potential to provide for a variety of household types with a reasonable standard of privacy and amenity. They generally have the space and flexibility to provide for people whether they are young or old, single people (often sharing), couples or families, and disabled people, or people who need a carer for certain activities or overnight.

7.14 Camden's Local Housing Needs Assessment indicates that the borough's need for affordable housing over the period 2026 – 2041 significantly exceeds 50% of the overall supply of new housing envisaged by Policy H1, and greatly exceeds the delivery of 3,000 additional affordable homes anticipated by the delivery target in Policy H4. The Council can only maximise affordable housing delivery by maximising the delivery of self-contained housing. Although Policy H4 provides some flexibility for the delivery of affordable housing from more particular forms of housing development such as purpose-built student accommodation, only permanent self-contained housing can be required to deliver the forms of affordable housing that address the needs of those with the lowest incomes.

Support for other forms of permanent housing

7.15 In recent years, the market in Camden has been unable to deliver the numbers of homes envisaged by the Camden Local Plan 2017 or the London Plan 2021, and therefore the borough's score was below 100% under the Housing Delivery Test's measurements for 2021, 2022 and 2023. Given challenging market conditions for housebuilders and the flow of investment towards rental products that deliver a long-term revenue stream, the Council recognises that diversity of housing supply is necessary to maximise housing delivery, and that this may involve more particular forms of housing, some of which are not self-contained.

7.16 Non self-contained housing with shared facilities is generally aimed at a particular group, or household type (e.g. students or single people). This accommodation can be the best way of tailoring facilities, or support, to suit the characteristics of a particular group, but provides less flexibility for alternative occupiers and can create a greater risk of conflict between people with different cultures and lifestyles.

7.17 In the light of these considerations, the Council supports a number of more particular forms of housing, including build to rent and housing for people with care or support requirements (such as older people), subject to the specific Local Plan policies for those types of housing, and the particular form(s) of housing specified in each site allocation. Detailed requirements for more particular forms of housing are set out in Policies H6 and H8 to H11.

Ensuring homes are occupied

7.18 Government data provides a snapshot of the number of vacant homes each October, including homes vacant for 6-months or more (long-term). Whilst the number of long-term vacant homes in Camden fluctuates, it has exceeded 1,000 homes in nine of the ten years from October 2015 to October 2024, and reached a high of 1,652 long-term vacant homes in 2024 (approximately 1.5% of estimated dwelling stock). Government data also indicates that the ratio of Camden's median house price to the median annual earnings of residents has exceeded seventeen to one for each year from 2014-2023, suggesting that the demand for housing far outstrips supply. Whilst an element of vacancy in the housing stock is inevitable, given the high demand for housing in Camden, returning vacant homes to use is a key priority.

7.19 In the light of this data, the Council will continue to use a variety of means to bring empty homes back into use, including:

- issuing Council Tax penalties – where a home has been empty for 2 years and over, this attracts a 100% premium, doubling the council tax payable. If the property remains empty for 5 years or more a 200% premium will be payable, tripling the council tax payable. Homes kept empty for over 10 years or more will attract a 300% premium, which quadruples council tax payable;
- taking enforcement action where works to a property are required;
- issuing an empty dwelling management order under the Housing Act 2004; and
- using compulsory purchase orders to acquire land and buildings.

7.20 In addition to these measures, the Council will explore ways to ensure that investment homes are made available for occupation, such as encouraging owners to use our local lettings agency Camden Lettings. The Council will also apply Local Plan policies flexibly where this is necessary to enable refurbishment of a property that would otherwise remain vacant.

Resisting the development of housing for use as short-term lets

7.21 The Council will support proposals for hotels and visitor accommodation in suitable locations where their impacts are appropriately mitigated, as set out in Chapter 9 - Delivering an inclusive economy. However, the growing use of new and existing homes in Camden for short-term lets threatens to seriously reduce the stock of housing available to long-term residents, whilst proposals to create new housing specifically for short-term lets threaten our ability to meet targets for delivery of permanent housing.

7.22 Under the current legislation applicable to London, planning permission is required for a residential property to be used for short-term lets (let for periods of less than 90-days) unless the use is restricted to a total of 90 days in any one year. However, on the basis of data commissioned for Central London First, in Camden there are over 4,000 short-term lets being offered for aggregate periods exceeding the 90 day restriction, and over 5,000 entire homes being marketed for short-term lets. In addition, data compiled by Camden indicates that equivalent weekly rental for short-term let in Camden is over twice the average rent available in the wider market, and over three times for 1 bedroom and 2 bedroom homes. Given the threat that the growth of this use poses to the rental housing market and the delivery of new permanent homes, the Council will resist the development of housing for use as short-term lets, unless the site is shown to be unsuitable for the provision of any form of permanent housing. Further information is provided in association with Policy H3 (Protecting Existing Homes).

Resisting alternative development of identified housing sites

7.23 As noted above, Camden has recently experienced disappointing results from the Housing Delivery Test, and has affordable housing needs that greatly exceed the likely future supply. Consequently, the Council must make strenuous efforts to deliver additional permanent housing.

7.24 Where possible, we have identified underused sites that are suitable for additional permanent self-contained housing or another form of permanent housing and allocated them in this Plan, and we will resist an alternative use of these allocated sites. However, a high proportion of the housing developments that come forward in Camden are not identified in advance because they are small sites or were in use when sites were assessed for allocation. Given this, the Council will also resist the alternative development of sites without an allocation where they have an existing consent for self-contained housing or another form of permanent housing (an existing consent is one that has not expired or remains in effect because development has been started).

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 evidence to demonstrate that there is no reasonable prospect of a viable development for permanent self-contained housing coming forward within the Plan period. 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 reasonable prospect of a viable development for any form of permanent housing coming forward within the Plan period. All relevant material considerations will be taken into account, such as whether the alternative development will free up a replacement site in the borough for permanent housing or provide an essential community facility or infrastructure that cannot be accommodated elsewhere.

7.26 The Council will generally treat live / work units in the same way as housing for the operation of development policies. Such premises contribute to the range of homes and business premises in the borough, and the Council will not resist the development of live / work premises on sites that are considered suitable for housing provided that they include an appropriate mix of dwelling sizes and types in accordance with other policies including H4 and H7.

7.27 As indicated above, short-term lets or visitor accommodation are not considered to be a suitable alternative use of a site identified for any form of permanent housing because they do not meet our assessed housing needs or contribute to meeting our targets for delivery of permanent housing.

Optimising sites to deliver housing

7.28 To maximise housing output whilst ensuring high standards of design and amenity, we will use a design-led approach to optimise the delivery of housing on each site that comes forward. Further guidance on this is set out in the Mayor's London Planning Guidance (LPG) on Optimising Site Capacity: A design led approach.

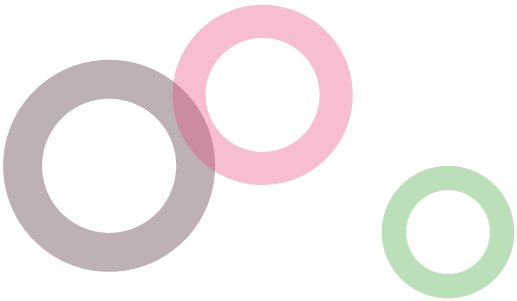
7.29 Where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for permanent housing (prioritising self-contained housing) unless:

- 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 to the satisfaction of the Council that the site is unsuitable for permanent housing (e.g. in terms of the amenity of occupiers) or there is no reasonable prospect of a viable development for permanent housing coming forward within the Plan period.

7.30 Where non-residential uses are required on the site, the Council will seek mixed-use schemes including the maximum appropriate provision of permanent housing. Details of our approach to seeking the inclusion of permanent self-contained housing as part of mixed-use developments in defined areas of high public-transport accessibility are set out in Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes).

7.31 When considering the optimum number of homes, the Council will have regard to all relevant policies and guidance, particularly those related to design and heritage, such as policies addressing conservation areas, the appropriateness of tall buildings, mobility difficulties and accessibility, and applicable space standards. We will also consider the accessibility of the site by public transport and the density of housing in the immediate context. Taking account of the Sustainable Residential Quality density matrix in the London Plan 2016, the Camden Local Plan 2017 indicated that densities of new self-contained homes should generally be between 45 dwellings per hectare (in areas of existing low density or lower public transport accessibility) and 405 dwellings per hectare (in areas of existing high density or higher public transport accessibility). This range continues to be appropriate as a broad guideline, but the Council recognises that lower or higher densities may be justified in some contexts.

7.32 We will expect self-contained housing to comply with the nationally described minimum space standards as adopted in the London Plan and Local Plan Policy D3 (Design of Housing). For major developments (those involving 10 or more homes), we will also seek to minimise the proportion of self-contained homes that exceed the space standard (for the relevant number bed spaces / occupiers and storeys) by more than 50%, whilst bearing in mind that large homes or apartments may be appropriate as the characteristic built form in some contexts, and may be the best way to secure development viability in some local markets and from some parts of buildings (e.g. the upper floors of tall buildings).



Flexible implementation

7.33 Given current and future uncertainties, there is a need to monitor the supply of housing closely and make adjustments to the way we implement our Local Plan policies to ensure that our targets for additional homes are met. If overall housing supply appears to be threatened by economic conditions, there are a number of areas of flexibility in the Council's policy approach that will enable us to tailor our objectives to the particular circumstances of each proposal with a view to maximising delivery. These include:

- varying the proportion of market and affordable housing;
- varying the split between low-cost rented housing (homes for Social Rent or London Affordable Rent) and intermediate affordable housing;
- positively considering different forms of intermediate affordable housing to take advantage of the funding and credit that is available;
- varying the range of home sizes sought, particularly amongst market housing; and
- reviewing the range of Section 106 planning obligations sought to maintain viability.

7.34 In negotiating the range of housing types and sizes on individual sites, including the proportion and range of affordable housing, the Council will have regard to the characteristics and constraints of the site and the area, progress towards meeting Camden's overall housing target, the financial viability of the development, the contribution the development makes to the creation of mixed communities, and other Local Plan objectives.

7.35 In seeking to secure the future supply of additional housing, we will work in partnership with many other organisations and agencies involved in the development and funding of housing and affordable housing. These will include our developers, landowners and private landlords, Housing Associations and other affordable housing providers, government departments and agencies, the Mayor and the GLA, and other local authorities – particularly councils in Central and North London.

Maximising the supply of self-contained housing from mixed-use schemes

7.36 Policy H2 promotes the inclusion of permanent self-contained housing as part of a mix of uses. It applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase.

7.37 Policy H2 also applies to all non-residential uses, including hotels and other visitor accommodation and non-residential institutions. However, a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought.

7.38 Policy H2 specifically seeks provision of permanent self-contained housing (Use Class C3), rather than other forms of housing, in line with the priority land-use of the Plan as set out in Policy H1 (Maximising Housing Supply). The meaning of the term "permanent self-contained housing" is explained in the paragraphs below Policy H1.

7.39 Policy H2 sets out a specific approach to seeking permanent self-contained housing as part of a mix of uses in "defined areas of high public transport accessibility". These defined areas comprise:

- the defined South Camden sub-area;
- the town centre of Camden Town, along with the southern edge-of-centre area enclosed by the town centre boundary, Camden Road, the boundary of the South Camden sub-area, and Parkway;
- the town centre of Finchley Road / Swiss Cottage.

Policy H2

Maximising the supply of self-contained housing from mixed-use schemes

A. Where non-residential development is proposed in any part of the borough, the Council will support the aims of Policy H1 by promoting the inclusion of permanent self-contained homes as part of a mix of uses.

B. In the defined areas of high public transport accessibility (set out in paragraph 7.39), we will expect a contribution to permanent self-contained housing from all developments that provide additional non-residential floorspace and involve additional floorspace of 200 sqm (GIA) or more. The Council will seek to negotiate the contribution to permanent self-contained housing on the following basis:

1. a self-contained housing target of 50% is applied to all additional floorspace proposed (GIA);
2. the target is not applied to development in the defined Hatton Garden area provided that an equivalent contribution to jewellery workspace is provided in place of permanent self-contained housing;
3. the target is not applied to development (or parts of development) which are publicly funded or otherwise serve an acknowledged public purpose provided that the public purpose is secured for a reasonable period;
4. the target is applied to additional floorspace proposed, not to existing floorspace or replacement floorspace;
5. the target is sub-divided to provide an affordable housing target and a market housing target on the basis of Policy H4;
    a. for developments involving an additional floorspace of at least 200 sqm (GIA) but less than 1,000 sqm (GIA), we will seek on-site delivery of self-contained housing, but will have regard to the criteria in Part C of this policy, and provide flexibility for off-site delivery where on-site delivery would demonstrably and unavoidably result in housing or non-residential floorspace of unsatisfactory quality;
    b. for developments involving an additional floorspace of 1,000 sqm (GIA) or more, self-contained housing should be provided on site, subject to the criteria in Part C;
6. for developments involving an additional floorspace of 2,000 sqm (GIA) or more, affordable housing should be provided on site, subject to the provisions of Policy H4;
7. where the self-contained housing target cannot be met in full, we will prioritise the on-site delivery of affordable housing;
8. where self-contained housing cannot practically be provided on site, or off site provision would create a better contribution (in terms of quantity, quality and / or affordability), the Council may accept provision of self-contained housing off site in the same area, or exceptionally a payment-in-lieu.

Policy H2

Maximising the supply of self-contained housing from mixed-use schemes

C. In considering whether the self-contained housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:

1. the character and size of the development, and any constraints on developing the site for a mix of non-residential uses and self-contained housing, including constraints arising from operational requirements of the proposed non-residential use and other nearby uses;
2. the impact of a mix of uses on the efficiency and overall quantum of development;
3. the extent of any additional floorspace needed for an existing user;
4. any floorspace needed for particular Central Activities Zone (CAZ) activities, having regard to CAZ strategic functions and specialist clusters recognised by the London Plan, and designations in this Plan;
5. the vision, objectives and policies of the Euston Area Plan and the particular challenges affecting land directly involved in the construction and / or redevelopment of the stations at Euston, including the funding requirements associated with rail infrastructure, and the potential for a flexible approach across a portfolio of sites, having regard to the residential and non-residential floorspace involved in demolition related to rail infrastructure and replacement of properties;
6. whether active street frontages, natural surveillance and community safety (within and outside normal business hours) can best be promoted through the provision of self-contained housing, retail or other uses;
7. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as visitor accommodation, and any recommendations of an independent viability assessor commissioned to advise the Council; and
8. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

D. In the defined areas of high public transport accessibility (set out in paragraph 7.39), where provision of self-contained housing falls significantly short of the Council's 50% target due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek an early and/ or a late stage viability review to determine the maximum deliverable contribution to affordable housing and/or deliverability of an additional financial contribution towards the self-contained housing shortfall.

7.40 Policy H1 indicates that where sites are underused or vacant, we will expect the optimum provision of housing that is compatible with any other uses needed on the site. Where it is not appropriate to develop a site entirely for housing, securing permanent housing as part of a mixed-use scheme is another way of meeting some of Camden's housing needs whilst also meeting other needs in the area, such as providing jobs, services and facilities. Developing a mix of uses on individual sites and across an area can also be beneficial in other ways, such as:

- increasing community safety and security by providing a range of activities that attract people at different times during the day and evening;
- contributing to the creation of areas that are diverse, distinctive and attractive;
- reducing the need to travel between homes, jobs and services;
- overcoming the loss of customers for shops and services arising from increased home-working and less consistent occupation of workplaces; and
- allowing an efficient use of land, with housing developed above those uses which benefit from direct ground floor access or a street-level frontage, such as shops.

7.41 Much of the borough already has a well-established mixed-use character. To support this mixed-use character and the aims of Policy H1, the Council will encourage non-residential development throughout the borough to provide a mix of uses including permanent self-contained housing.

7.42 Where Policy H2 applies to development, the Council will generally seek permanent self-contained housing (in Use Class C3). This is consistent with the specification of permanent self-contained housing as the priority land-use of the Local Plan in Policy H1. The term "permanent" refers to any housing that is available to let to a single occupier or household for a period of not less than 90-days, and is used to distinguish it from short-term lets or visitor accommodation (accommodation available to let throughout the year for periods of less than 90 days). Short-term lets or visitor accommodation are not acceptable alternatives to permanent self-contained housing because they do not meet our assessed housing needs or contribute to meeting our targets for delivery of permanent housing.

7.43 To ensure that housing provided as part of a mixed use scheme contributes to meeting the targets identified in Policy H1, rather than being used as ancillary space by non-residential occupiers, the homes should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.

7.44 The Council has established detailed requirements for non-residential development in the defined areas of high public transport accessibility (set out in paragraph 7.39) as these are the parts of the borough which have the most intense pressure for non-residential uses, the best potential for a mix of uses, the best prospect for the development of housing above active street frontages, and the best access to public transport. The requirements apply to the South Camden sub-area and the town centres of Camden Town (including an edge-of-centre area around the southern part of the town centre) and Finchley Road / Swiss Cottage. The edge-of-centre area around the southern part of Camden Town is enclosed by the boundaries of the town centre and the South Camden sub-area, which meet to the east at Camden Road and to the west at Parkway. As parts of this area have potential for non-residential development (particularly close to Bayham Street and Arlington Road), if the requirements did not apply, there is a significant risk that developers of town centre uses would favour this area over the town centre itself.

7.45 Additional housing in these specified locations will help provide activity and surveillance when businesses are closed, enliven marginal areas at the periphery of established frontages, and support shops, services and local facilities. Therefore, the Council will require development schemes in these specified areas to provide a mix of uses subject to the considerations set out in Policy H2, and will seek half of all additional floorspace as permanent self-contained housing (in Use Class C3), such that additional floorspace in residential use matches all the additional floorspace in non-residential uses.

7.46 In these locations, Policy H2 provides criteria used to determine whether a contribution to self-contained housing is sought, the type of housing sought, whether the housing should be provided on site or off site, and achieving an appropriate mix of housing and other uses. The following paragraphs explain these in turn. Further details of the operation of Policy H2 are also set out in the Council's Camden Planning Guidance on Housing, and developers will be expected to have due regard to this.

Proposals where we will seek a contribution to housing

7.47 Proposals for additional non-residential floorspace in the defined areas of high public transport accessibility will be expected to contribute to permanent self-contained housing in accordance with the provisions of criteria (1) to (10) in Part B of Policy H2. The Council has applied a target of 50% for the proportion of self-contained housing since in 2004, and has used this successfully as the starting point for negotiations. The target is applied flexibly, having regard to the full set of criteria in Part C.

7.48 No contribution is sought from developments involving additional floorspace of 200 sqm (GIA or gross internal area) or less. This threshold is based on the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development.

7.49 In the designated Hatton Garden area, the Council's priority is to secure and protect a stock of premises for the jewellery sector and support the nationally important cluster of jewellery manufacture and trading that gives the area its special character. Consequently, in accordance with Local Plan Policy S3, in the Hatton Garden area we will seek a contribution to affordable jewellery workspace rather than a contribution to housing.

7.50 We will not seek a contribution from those elements of a development that are publicly funded or otherwise serve an acknowledged public purpose, such as hospitals, museums, educational, medical and research institutions, and transport infrastructure and facilities. We recognise that the nature of public funding may preclude development to serve other purposes, the sites available to the public purse are often too constrained to provide space for other uses, and the nature of some public services will not be compatible with housing (e.g. 24 hour activity and movements serving a hospital). Challenges arising from funding and rail infrastructure associated with the Euston stations (HS2 and National Rail) will also have a bearing on the operation of Policy H2, as discussed further in paragraph 7.69.

7.51 Policies elsewhere in the Local Plan (such as the Inclusive Economy chapter) seek to protect a number of existing non-residential uses, such as offices, industry and warehousing. In addition, the London Plan prioritises offices and other strategic functions in the Central Activities Zone. To ensure that valued non-residential uses are not compromised, we will only seek a contribution to housing from net additions to floorspace, and not to existing floorspace that is retained, refurbished or replaced.

Whether the housing contribution should be made on-site

7.52 We recognise that where the additional floorspace proposed is less than 1,000 sqm GIA, given the need to accommodate separate access lobbies, stairs and lifts, maintain existing ground floor activity, provide an efficient layout, and provide a satisfactory standard of residential amenity, it may be difficult to accommodate a contribution to housing on-site. Consequently, for schemes of this scale, we will provide flexibility for off-site contributions where on-site provision would demonstrably compromise the quality of the space. However, we will expect larger schemes to provide on-site contributions to self-contained housing. In all cases, we will have regard to the full set of criteria in Part C of this policy.

Relationship with affordable housing requirements

7.53 Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought subject to the provisions of Policy H4. Based on the additional floorspace proposed, the 50% target for self-contained housing, and the provisions of Policy H4, the self-contained housing target will be sub-divided into an affordable housing target and a market housing target. This will enable us to operate a priority for delivery of affordable housing, as explained in the following paragraphs.

7.54 Policy H4 anticipates that affordable housing will be provided as a payment-in-lieu for developments with capacity for fewer than 10 additional dwellings, while larger schemes will provide affordable housing on-site. Under the provisions of Policy H4, developments with capacity for 10 additional homes will generally be those involving a residential floorspace of 1,000 sqm GIA or more (when rounded to the nearest 100 sqm). Considering this in tandem with the Policy H2 target for 50% of additional floorspace to take the form of self-contained housing, where the total additional floorspace proposed is 2,000 sqm (GIA) or more, we will expect on-site provision of affordable housing.

7.55 The 2017 London Strategic Housing Market Assessment indicated that 47% of the housing need in London would be for low-cost rented housing and a further 18% would be for intermediate housing. Camden's Local Housing Needs Assessment found a broadly similar range of affordable housing needs, but with as much as 60% of anticipated housing supply being required to meet the need for low-cost rented housing. Over the years 2016 – 2021, 923 additional affordable homes were delivered in Camden, which was 27% of the five-year need based on the Camden Strategic Housing Market Assessment 2016. Consequently, where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the Council will prioritise delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4. For example, in the past we have accepted proposals which omit the market housing but deliver the entire affordable housing component, and schemes which deliver only affordable housing by switching the tenure of market homes to be delivered elsewhere (not yet built, but benefitting from a live planning permission).

7.56 Where the floorspace sought for self-contained housing under the terms of Policy H2 has capacity for 16 or more additional homes, we will apply the London Plan affordable housing viability thresholds as set out in association with Local Plan Policy H4. When applying the thresholds, we will have regard to the high level of affordable housing needed compared with past delivery, and prioritise the delivery of affordable housing. Where a viability threshold below 50% applies, the Council will generally encourage the development to deliver solely the full 50% strategic target of affordable housing as an alternative to delivering the full target level of self-contained housing alongside a lower viability threshold level of affordable housing, but will negotiate having regard to the quality and mix of affordable homes that can be achieved.

Off-site contributions

7.57 There may be circumstances (even when the additional floorspace is 1,000 sqm or more) where housing cannot practically be achieved on-site or would more appropriately be provided off-site (for example where the entire additional floorspace is needed for an existing user). Relevant considerations are set out in Part C of this policy. Where the Council considers that off-site provision is appropriate this will be secured through a planning obligation. There is intense competition for development sites in Camden, which creates a risk that no site will become available for delivery of the housing if it cannot be identified by the time the non-residential application is determined. Consequently, the Council will normally expect the planning obligation to specify the anticipated delivery site (or sites).

7.58 When considering the merits of off-site delivery, the Council will have regard to other land-holdings an applicant may own or control in the borough (sometimes referred to as a 'portfolio' approach), and the potential for using land-use swaps to deliver permanent housing off-site whilst off-setting non-residential additions. Where an applicant anticipates bringing forward non-residential development in the future, we will also consider requests to use land-use credits which the applicant is awarded for delivering off-site permanent housing in advance on a site that would otherwise remain in non-residential use. This 'portfolio' approach may be suitable to address the challenges arising from funding and rail infrastructure associated with the Euston stations (HS2 and National Rail), as identified by criterion 5 of Policy H2 Part C. Ways to address these challenges are as discussed further in paragraph 7.69.

7.59 For off-site provision, we will assess how much housing is required by looking at all sites involved in the arrangement. We will apply the 50% target to the additional floorspace added at all sites involved, taking into account the full addition to non-residential floorspace proposed at the application site, any gain or loss of non-residential floorspace arising at the site or sites where the housing will be delivered and the need to replace any existing housing lost as part of each development. Where the housing is delivered off-site, this will enable additional non-residential space to be provided at the application site, and increase the overall scale of development, so the Council will expect to achieve a significantly enhanced housing contribution off-site (in terms of quantity, quality and / or affordability), having regard to the net additional non-residential floorspace across all sites.

7.60 The Council will seek any off-site provision of housing on an alternative site (or sites) nearby. All alternative sites must be in the borough, and should be as close as possible to the application site as possible. Where the development is in the South Camden sub-area, alternative sites should be sought in the same sub-area. Where the development is in the town centre of Camden Town (including the identified edge-of-centre area), alternative sites should be sought in the Central Camden or South Camden sub-areas. Where the development is in the town centre of Finchley Road / Swiss Cottage, alternative sites should be sought in the West Camden or Central Camden sub-areas. In all cases, provided the applicant can demonstrate to the Council's satisfaction that they have undertaken a thorough exploration of options, if no appropriate sites are available in the specified sub-areas, the Council may be prepared to consider sites in other parts of the borough where warranted by the overall benefits of the developments facilitated. As part of the consideration of off-site options we will explore with developers whether the housing could be delivered on Council-owned land.

7.61 Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for housing, we may accept a payment-in-lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation. Payments should be based on the difference between: the value of the development as proposed (with no self-contained housing, or with less self-contained housing than is required by Policy H2); and the value of a similar hypothetical development including the full requirement for self-contained housing (including any required affordable housing). This basis ensures that the payment is equivalent to the gain to the developer from failing to meet the full self-contained housing requirement.

7.62 More detailed information regarding the calculation of off-site provision and payments-in-lieu is provided in our Camden Planning Guidance on housing and Camden Planning Guidance on planning obligations, and developers will be expected to have due regard to this. Camden Planning Guidance currently sets a payment rate of £1,500 per sqm (GIA) of omitted self-contained housing (including the market and affordable housing), based on viability testing a variety of development typologies. This rate will be updated periodically through Camden Planning Guidance to reflect changes in development values and costs. Applicants may also submit their own financial viability appraisal to indicate an appropriate level of payment calculated on the basis set out above. In such cases, the Council will seek funding from the developer for an independent verification of the appraisals.

Higher Education institutions and student housing

7.63 In accordance with Part B criterion 3, we will not seek a housing contribution from development of non-residential floorspace secured for occupation by a Higher Education institution which is supported by the Office for Students, and thereby serves a public purpose. In addition, where development is proposed by a Higher Education institution supported by the Office for Students, as an alternative to seeking permanent self-contained housing, the Council may support a mixed-use development including student housing (known as purpose-built student accommodation) that serves the same institution, subject to the student accommodation satisfying the requirements of Policy H9.

7.64 Student accommodation proposed in accordance with Policy H9 is considered to be residential floorspace and therefore the requirements of Policy H2 do not apply. The Council will not seek the inclusion of self-contained housing in such proposals except in relation to the application of Part D of Policy H4 (which encourages contributions to affordable housing) and Part B of Policy H1 (which resists alternative development of sites identified for permanent self-contained housing).

Achieving an appropriate mix of housing and other uses

7.65 Where permanent self-contained housing is sought as part of a mix of uses, all criteria in Policy H2 will be used to help us consider the appropriate mix of housing and other uses for a site, and whether the housing should be provided on the site or elsewhere. Further detail of how these criteria will be applied are set out in the Council's Camden Planning Guidance on housing (including the assessment of financial viability), and developers will be expected to have due regard to this. A number of considerations relating to Part C of Policy H2 are set out below.

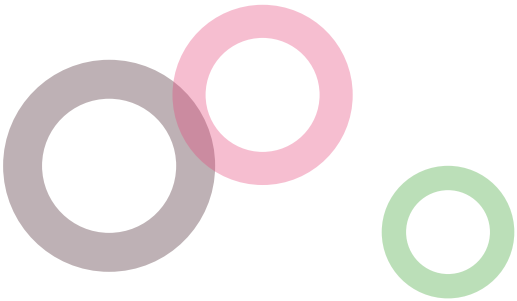
7.66 The character and size of the development may influence the mix of uses that is most appropriate. For example, elements of a development that adjoin existing buildings and / or are adjacent to a narrow street may be unable to provide satisfactory daylight and sunlight for permanent housing, while those involving cultural uses, such as performance spaces, may be unable to accommodate permanent housing in the same building due to levels of noise and vibration. Developments may also be constrained by the need to incorporate an existing building (especially a listed building or a building that makes a positive contribution to a conservation area) which is unable to accommodate particular new features necessary to support housing or non-residential uses, such as additional doors and window openings to serve housing, or generous floor to ceiling heights with contemporary mechanical and electrical services to meet the needs of commercial uses.

7.67 The appropriate mix will also be influenced by the impacts of multiple entrances, staircases and lifts, particularly where a limited street frontage is available, or where both market and affordable housing are sought. We will take account of the impacts on the overall usable area, the layout of the different uses, and how these factors affect viability. We will also consider the space needs of existing users and seek to ensure that they can expand without relocating.

7.68 In some areas, there may be local priorities to be balanced against the priority given to housing, particularly in the Central Activities Zone (CAZ). The town centres and the CAZ provide frontages that are key to the area's retail and service function, and these should not be compromised by the introduction of alternative uses or extensive entrance lobbies. The CAZ also supports some uses that have a national or international function and make major contributions to Camden's economy, and their needs will be given significant weight. In addition, the Council supports the institutions and activities that comprise the Knowledge Quarter in the general area of King's Cross and Euston, such as the Wellcome Institute and the British Library, and their requirements may be foremost in particular locations.

7.69 Part C of Policy H2 recognises the particular challenges affecting land directly involved in the construction and redevelopment of rail infrastructure at Euston, and the potential for a flexible approach across the sites involved. As indicated in paragraph 7.58 earlier, the Council will consider use of a 'portfolio' approach across sites in the same ownership and/ or control when applying the requirements of Policy H2 to the land involved. In applying Policy H2, we will also take account of the potential to replace the floorspace of properties that have been demolished in preparation for redevelopment to provide the Euston stations (HS2 and National Rail). In all cases, we will expect proposals to be in accordance with the vision, objectives and policies of the Euston Area Plan.

7.70 Residential and non-residential uses can both add to community safety by increasing the diversity and vitality of streets and providing natural surveillance. When considering these factors, we will consider all publicly accessible spaces within and surrounding a development, the interface between the development and public spaces at street level and above, and the levels of activity and surveillance inside and outside normal business hours.



7.71 The Council will positively consider alternative approaches that can better deliver a supply of land for permanent self-contained housing, for example making a site available for housing development by another organisation such as the Council or a Housing Association. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver a mixed-use scheme containing housing, such as the impact of providing a new station entrance to promote use of public transport.

7.72 In negotiating the appropriate mix of uses, the Council will consider all aspects of financial viability including particular costs associated with the development and the distinctive viability characteristics of particular development sectors (such as visitor accommodation). We will generally expect submission of a financial viability appraisal to justify the mix proposed, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. The Council will also expect developers to fund an independent verification of the appraisal.

7.73 Where a contribution to permanent self-contained housing is sought by Policy H2 but financial viability constraints prevent a development from meeting the 50% target and there is a prospect of viability improving prior to completion, the Council will expect a late stage viability review to take place when costs and receipts are known as far as possible. Where a requirement for on-site affordable housing applies, we may seek an early stage viability review in accordance with Local Plan Policy H4 and the London Plan viability thresholds.

7.74 Where an early stage viability review shows that viability has improved since permission was granted, we will seek additional affordable housing on-site in accordance with the London Plan. Where a late stage viability review shows that viability has improved, we will seek a further financial contribution to self-contained housing, not exceeding the payment-in-lieu that would arise from the shortfall between the initial contribution and the 50% target, and having regard to any other priority uses introduced as an alternative to self-contained housing. Our Camden Planning Guidance on housing provides more detailed guidance on viability review mechanisms, and developers will be expected to have due regard to this.

Protecting existing homes

7.75 Policy H3 seeks to protect all permanent residential floorspace where people live long-term (i.e. for periods of not less than 90 days).

7.76 We have not sought to insert the word "permanent" in every reference to housing or homes, but have included it when it is necessary to make policy requirements clear. It also seeks to protect individual self-contained houses and flats (in Use Class C3), and some other individual homes as follows:

- houses and flats shared by 3 to 6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, in Use Class C4, but can change to Use Class C3 without a planning application under the freedom provided in legislation); and
- live / work units, which are self-contained homes that include a dedicated work area (not in any planning use class, but we will treat them as Use Class C3 when we apply Local Plan policies).

7.77 Other policies in this section of the Local Plan also include more specific provisions protecting particular types of housing, as follows:

- affordable housing floorspace is protected by Policy H5;
- housing for older people, homeless people and other people with care or support requirements is protected by Policy H8;
- student housing (known as purpose-built student accommodation) is protected by Policy H9; and
- other housing where occupiers do not live as a family but are long-term residents sharing some rooms and/ or facilities (housing with shared facilities, including larger houses in multiple occupation or HMOs) is protected by Policy H10.

Policy H3
Protecting existing homes

A. The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by seeking to: retain all existing residential floorspace; prevent year-round use of housing as short-term lets: and prevent the net loss of homes from alterations to existing houses and flats.

B. The Council will resist development that would involve a net loss of residential floorspace, including any residential floorspace that is provided:

1. within hostels or other housing with shared facilities; or
2. as an ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use.

C. The Council will resist the year-round use of residential floorspace as short-term lets (lets for periods of less than 90 days).

D. The Council will resist development affecting existing houses and flats that would result in the net loss of homes, unless the development:

1. amalgamates homes to create one larger home and results in the net loss of only one home (taking into account extant permissions and cumulative change since June 2006);
2. enables the creation of additional large homes with 3-or-more bedrooms in the wards of Bloomsbury, Holborn and Covent Garden, Kilburn, and King's Cross;
3. alters existing affordable homes to enable the creation of the affordable dwelling-sizes that are most needed; or
4. enlarges sub-standard homes to meet the nationally described space standard where they are currently 20% or more below it and the loss of homes is the minimum necessary to meet the relevant standard.

Loss of residential floorspace

7.78 As indicated in the paragraphs accompanying Policy H1, meeting housing needs in Camden and across London will be challenging. To tackle Camden's housing needs, the Council aims to maximise the supply of additional housing and regards self-contained housing as the priority land-use of the Local Plan. Where it reduces the number of people that can be accommodated, loss of floorspace from shared housing adds to the amount of housing required to meet our housing targets. Homes with 3 bedrooms are a high priority amongst market homes and affordable homes for low-cost rent, as set out in our Dwelling Size Priorities Table associated with Policy H7, but the supply of these homes can be reduced by the loss of floorspace from self-contained homes. Consequently, the Council resists development that would involve a net loss of residential floorspace from any type of existing housing.

7.79 The types of housing we aim to protect include:

- floorspace at hostels, nursing homes, care homes and hospitals where people live long-term, such as accommodation for nurses, people requiring support or rehabilitation to return to independent living, and for people who are no longer able to live independently (including resident lounges, sleeping areas, bathrooms / toilets, and associated circulation space); and
- residential floorspace that is ancillary to another use (e.g. staff accommodation above a shop or pub) where the proposed change involves development and is subject to planning control.

7.80 Small losses of residential floorspace may be acceptable where they will enable delivery of other Local Plan priorities, but we will resist any reductions in floorspace that are material because they reduce the number of residents who can occupy a home or property.

Short-term lets

7.81 Short-term lets are lets for any period of less than 90-days, and frequently involve periods of a few days or weeks. As set out in the paragraphs supporting Policy H1 (Maximising Housing Supply), the Council is supportive of hotels and visitor accommodation in suitable locations and with appropriate mitigation of impacts, but the recent growth in the use of existing homes as short-term lets threatens to seriously reduce the stock of housing of housing available to long-term residents. In London, the Greater London Council (General Powers) Act 1973 (as amended by the Deregulation Act 2015) provides for Council Tax payers to let their property as visitor accommodation for short periods not exceeding a total of 90 days in any one calendar year; however, a permanent change to use as housing for short-term lets throughout the year would constitute development.

7.82 As indicated in association with Policy H1, data commissioned for Central London Forward indicates that over 5,000 entire homes in Camden are being marketed for short-term lets. The data also shows that more than 10% of Camden's private rented homes are offered as entire properties available for short-term lets over aggregate periods exceeding 90 days. Consequently we will resist proposals that would involve a permanent change of residential floorspace from long-term accommodation to use for short-term lets throughout the year.

7.83 Visitor lettings can also increase the incidence of noise, sometimes at unsociable hours, and generate high turnover of occupiers that harms community cohesion and increases the fear of crime. The Deregulation Act provides for the Council to seek to exempt particular properties or areas from the provisions that allow visitor lettings of residential properties where this is necessary to protect the amenity of the locality. The Council will monitor the impact of visitor lettings and if evidence emerges of harm to amenity in particular locations, we will consider seeking exemptions from the provisions that allow it. Householders considering letting out their property are also advised to check the terms of their leases, tenancies, insurance and mortgages, as these may contain restrictions that prevent them from letting the property to somebody else.

Net loss of homes

7.84 Housing targets can only be met by net additions to housing numbers. Every home that is lost through redevelopment or conversion is a home that needs to be replaced. Based on past evidence, we estimate that approximately 50 dwellings a year are lost through development affecting existing housing that involves a net loss of homes. Past evidence also shows that around 40% are lost in developments involving the loss of a single home, many of which involve combining two flats to create a single dwelling. The Council therefore aims to ensure that the overall supply of housing will not be compromised by developments involving a net reduction in the number of existing homes. Where development involves the demolition or other loss of homes, the Council will generally expect it to provide a similar or greater number of replacement dwellings, to an equivalent or better standard than the homes removed.

7.85 However, the Council also recognises that there are situations where the loss of individual homes may be justified. Policy H3 indicates that such losses may be acceptable in certain situations, as specified in the following paragraphs.

7.86 Net loss of 1 home is acceptable when 2 dwellings are being amalgamated into a single dwelling. Such developments can help families to deal with overcrowding, to grow without moving home, or to care for an elderly relative. Within a block of flats or apartments, such a change may not constitute development. However, the Council will resist the loss of 2 homes or more within the same building or site, whether through individual applications or a series of incremental changes over the period since the adoption of this policy approach in June 2006, taking account of any past permissions that have been implemented or have not expired. We will also seek to co-ordinate the determination of multiple applications affecting homes at the same building or site to ensure that the net loss of 2 or more homes is not permitted unless this would be in accordance with criterion 2, 3 or 4 in Policy H3 Part D.

7.87 The four wards of Bloomsbury, Holborn and Covent Garden, Kilburn, and King's Cross currently have a low proportion of large dwellings compared with the borough overall. Data from the Census in 2011 and 2021 shows that less than 25% of households in these wards had 3 or more bedrooms (compared with over 30% across Camden). Consequently, in these wards, the Council considers a net loss of homes to be acceptable (including a net loss of 2 or more homes) where this enables the creation of 1 or more additional large dwellings with 3 or more bedrooms.

7.88 The existing stock of Social Rented housing (particularly Council housing) is heavily skewed to 1 and 2 bedroom homes. The 2021 Census indicates that 19.7% of households in Social Rented housing are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 9.5% across all tenures. We may therefore accept a net loss of affordable homes (including a net loss of 2 or more homes) where this enables the creation of affordable homes of the sizes that are most needed. Having regard to Policy H7 – Large and Small Homes – the homes created should generally include large homes with 3 or more bedrooms for Social Rent or London Affordable Rent.

7.89 Residential space standards are set out in the nationally described space standard and included in the London Plan. We may permit a net loss of homes (including a net loss of 2 or more homes) where the existing dwellings are 20% or more below residential space standards, provided the loss of dwellings is no greater than needed to meet the standards.

Further guidance

7.90 For the purposes of Policy H3 we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3) and will resist the net loss of small houses in multiple occupation. This reflects the freedom provided in legislation for changes between these uses without a planning application.

7.91 In some circumstances, where proposals would involve the loss of homes or residential floorspace, it may be appropriate for replacement homes or floorspace to be provided on an alternative site. We will have regard to criteria in Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) when considering whether housing should be retained on-site or re-provided off-site.

7.92 Our Camden Planning Guidance on housing provides further information about how we will apply Policy H3, and developers will be expected to have due regard to this.

Maximising the supply of affordable housing

7.93 Policy H4 seeks to maximise the supply of affordable housing in Camden to meet the needs of households unable to access market housing.

7.94 Policy H4 applies primarily to the following types of housing:

- self-contained houses and flats (Use Class C3);
- houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and / or facilities (small houses in multiple occupation or HMOs, in Use Class C4, but can change to Use Class C3 without a planning application under the freedom provided in legislation); and
- live / work units, which are self-contained homes that include a dedicated work area (not in any planning use class, but we will treat them as Use Class C3 when we apply Local Plan policies).

7.95 We will also apply Policy H4 to other types of housing, subject to the provisions in this Plan and in the London Plan policies relevant to the particular housing type, although the mechanics of considering and securing affordable housing provision may vary having regard to Policy H4 Parts D and E. Other policies in this section of the Local Plan also include more specific provisions protecting particular types of housing, as follows:

- affordable housing provisions for estate regeneration proposals are included in Policy H5;
- affordable housing provisions for market-led development of housing for older people, homeless people and other people with care or support requirements are included in Policy H8;
- affordable housing provisions for student housing (known as purpose-built student accommodation) are included in Policy H9; and
- affordable housing provisions for other housing where occupiers do not live as a family but are long-term residents sharing some rooms and/ or facilities (larger houses in multiple occupation or HMOs, and large-scale purpose-built shared living) are included in Policy H10.

Policy H4

Maximising the supply of affordable housing

A. The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable. The Council will aim to maximise the supply of affordable housing, meet or exceed a borough wide delivery target of 3,000 additional affordable homes from 2026/27 - 2040/41, and achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.

B. We will expect a contribution to affordable housing from all major developments involving housing, and non-major developments that provide one or more additional homes and involve a total addition to housing floorspace of 100 sqm GIA or more. The Council will seek to negotiate the contribution to affordable housing on the following basis:

1. distinctive criteria will apply to smaller developments considered to have capacity for 15 or fewer additional homes, and larger developments considered to have capacity for 16 or more additional homes;
2. development capacity will be assessed on the basis that 100sqm (GIA) of housing floorspace creates capacity for 1 home;
3. in assessing development capacity, the additional housing floorspace will be rounded to the nearest 100 sqm (GIA);
4. in the case of smaller developments, a sliding scale target will apply, starting at 2% for developments with capacity for one additional home and increasing by 2% for each home added to the capacity (reaching an affordable housing target of 30% for developments with capacity for 15 additional homes);
5. in the case of larger developments, the London Plan's strategic affordable housing target of 50% will apply, but will be subject to the London Plan's viability threshold approach;
6. in all cases, we will apply a guideline mix of affordable housing types to seek 60% low-cost rented housing and 40% intermediate housing;
7. in all cases, we will assess the percentage of affordable housing and of each affordable housing type (usually low-cost rented housing and intermediate housing) on the basis of both the proposed housing floorspace and the proposed number of habitable rooms;
8. for the largest developments involving housing (typically those providing 100 homes or more), the Council may seek affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision;
9. the affordable housing sought should be provided on site wherever practical, particularly in the case of larger developments;
10. where affordable housing cannot practically be provided on site, or off site provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing off site in the same area, or exceptionally a payment-in-lieu; and
11. in the case of estate regeneration proposals, the distinctive affordable housing provisions for this type of development in Policy H5 and the London Plan will apply.

C. We will seek to ensure that where development sites are split, additional proposals are brought forward on the same site, or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution is comprehensively assessed for all the proposals together. The Council will seek to use planning obligations to ensure that all parts or phases of split or related sites make an appropriate affordable housing contribution.

D. Where a development of build to rent housing, purpose-built student accommodation, or large-scale purpose-built shared living is proposed, we will apply the distinctive affordable housing provisions of the London Plan for the relevant housing type, but as an alternative will strongly encourage contributions of self-contained affordable housing on these development sites in accordance with the guideline mix set out in criterion 6 of Part B above where feasible, having regard to whether developments are able to include separate blocks and/ or stair/ lift cores.

E. In considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:

1. any existing housing on site, including market housing and affordable housing, the provisions for protection of existing housing and estate regeneration proposals in Policies H3 and H5, and the impact that the existing housing has on the financial viability of the development;
2. any self-build or custom-build housing proposed, and whether this housing is consistent with the objective of Policy H1 to optimise the homes delivered on each site;
3. any housing proposed for people with care or support requirements (notably specialist older persons housing), the objectives of Policy H8, and any relevant provisions of the London Plan;
4. the character and size of the development, and any constraints on developing the site for a mix of housing including market and affordable housing or the particular types of affordable provision sought;
5. the impact on creation of mixed, inclusive and sustainable communities;
6. the impact of the mix of housing types sought on the efficiency and overall quantum of development;
7. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors, such as build to rent housing, and any recommendations of an independent viability assessor commissioned to advise the Council; and
8. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

F. Having regard to the London Plan, where a development's contribution to affordable housing falls significantly short of the Council's targets due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek early, mid-term and / or late stage viability reviews to determine the maximum contribution to affordable housing deliverable by the development.

Meaning of affordable housing

7.96 Affordable housing is provided to households whose needs are not met by the market. The London Plan supports two broad categories of affordable housing, low-cost rented housing and intermediate housing.

7.97 Low-cost rented housing comprises homes for Social Rent or London Affordable Rent. Eligibility is determined by the Council's Housing AllocationW Scheme. Low-cost rented housing is mostly owned by the Council or Housing Associations, and is subject to national rent setting guidance. Social Rents are guided by a national formula rent, whereas London Affordable Rents are based on the national formula but subject to GLA benchmarks, which are slightly higher than formula rent in Camden.

7.98 Intermediate housing costs less than market housing but more than low-cost rented housing and is provided to households with low to medium incomes. Eligibility is controlled by income caps set in the London Plan (and updated in London Plan Guidance and Annual Monitoring Reports), and by national policy for affordable home ownership. In Camden, it generally takes the form of intermediate rented housing in accordance with the Council's Intermediate Housing Strategy, but intermediate housing can also include shared ownership, First Homes and other forms of affordable home ownership where these can be made affordable to eligible households. In some cases, occupation may be prioritised or limited to key workers, such as health service staff, teachers and workers in emergency services.

7.99 The Council will seek planning obligations to ensure that affordable housing complies with these definitions, is available to Camden households that are unable to access market housing, and continues to be available at an affordable price in the future unless any subsidy is recycled. We will also ensure that the affordable housing is:

- delivered before or concurrently with any market housing forming part of the same proposal; and
- delivered in strict accordance with Local Plan objectives by a provider (usually a Housing Association) approved by the Council.

7.100 The Mayor's guidance on Viability and Affordable Housing advises that generally shared ownership is not appropriate where unrestricted market values of a home exceed £600,000. For the year ending September 2022, the average house price of newly built dwellings in Camden exceeded £800,000 and the average price paid by first-time buyers exceeded £600,000 in every month. Consequently, there is little prospect of delivering shared ownership at an affordable price in Camden.

7.101 In 2021 (shortly after publication of the finalised London Plan 2021), the Government introduced a product called First Homes, which is housing sold to first-time buyers at a discount, with the discount passed on at subsequent sales. In London, First Homes are to be sold to first-time buyers earning no more than £90,000 per year at a discount of at least 30% and at a price after discount of no more than £420,000. The GLA has issued guidance noting that in many cases discounts required in London to reach £420,000 would exceed 30%, while the homes are likely to be small, and accessible only to households close to the maximum eligible income.

7.102 The GLA guidance advises that in considering the potential for First Homes, decision-makers should continue to give weight to the London Plan, alongside the need for other affordable housing tenures, the level of discount required to reach the £420,000 price cap, and the impact this would have on delivery of other tenures. The Council's Planning Statement on the Intermediate Housing Strategy and First Homes (2022) considered these matters in detail, and concluded that First Homes are not a suitable form of affordable housing for delivery in Camden, and their inclusion should not be sought in developments in the borough.

7.103 The NPPF advises that major developments (generally those providing 10 or more homes) should expect a mix of affordable housing to meet identified local needs. It indicates that the mix can include Social Rent, other affordable housing for rent, and affordable home ownership. For the reasons set out above, the delivery of affordable home ownership in Camden is likely to be challenging. However, the Council will work with the GLA to assess whether there is potential to deliver an affordable home-ownership product of some kind that complies with London Plan and national guidance on price caps and eligible household incomes.

7.104 More detailed information on the mix of affordable tenures and rent levels sought in Camden and the Intermediate Housing Strategy are included in our Camden Planning Guidance on housing, and developers will be expected to have due regard to this.

Strategic affordable housing target and delivery target

7.105 The London Plan 2021 sets a strategic target for 50% of all homes across London to be genuinely affordable, based on the findings of the 2017 London Strategic Housing Market Assessment that 47% of the housing need in London would be for low-cost rented housing and a further 18% would be for intermediate housing. Camden's Local Housing Needs Assessment found a broadly similar range of affordable housing needs, but with as much as 60% of anticipated housing supply being required to meet the need for low-cost rented housing.

7.106 To set this Plan's target for affordable housing we have taken the overall housing target (including market housing), and estimated the maximum number of affordable homes likely to be viable and deliverable, taking into account affordable housing need, the relationship between development costs, the value of market and affordable homes, the funding available from the Mayor's Affordable Homes Programme, the income households have to spend on housing, past levels of delivery and the anticipated housing output of the Council's Community Investment Programme. Balancing these considerations, this Plan sets a delivery target of 3,000 additional affordable homes over the Plan period (200 per year).

Proposals that generate an affordable housing requirement

7.107 For consistency with the London Plan, Policy H4 seeks a contribution to affordable housing from all major developments involving housing. Major development is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010. In the context of the density of development in Camden, relevant major developments will generally be those providing 10 or more self-contained homes, or providing a building or buildings creating a floorspace of 1,000 sqm or more to be used for housing. Policy H4 also seeks a contribution from some non-major developments as explained below.

7.108 The NPPF advises that affordable housing should only be sought from major developments involving housing. In the light of the scale of affordable housing need in the borough, through examination of the Camden Local Plan 2017 the Council was able to make a successful case for local departure from the national approach. Policy H4 maintains the position in the Local Plan 2017, which sought an affordable housing contribution from all schemes that provide one or more additional homes and also involve a total addition to housing floorspace of 100 sqm GIA or more. This threshold excludes any homes or housing floorspace retained or replaced as part of the development, so in some cases developments exceeding this threshold also fall within the definition of major developments.

7.109 The Council's threshold for seeking contributions to affordable housing, and our approach to contributions from smaller developments, have been devised to minimise the risk of suppressing the delivery of homes, and have operated successfully since adoption of the Camden Local Plan 2017. As contributions are only required where a development involves both at least one additional home and 100 sqm GIA of additional housing floorspace, no contribution is sought from:

- schemes that simply extend or replace an existing home or homes (which helps the Council to expedite the replacement of homes that are subject to damage or disrepair, and the extension of homes for families that are growing or need space to care for a relative who is elderly or disabled);
- schemes that involve the subdivision of existing housing to create more homes; or
- schemes that provide one home or more where the total additional housing floorspace (including ancillary space) is below 100 sqm GIA (e.g. one home of 90 sqm GIA or two homes of 45 sqm GIA each).

7.110 Policy H4 also maintains two other characteristics of the Local Plan 2017 which alleviate the risk of negative impacts from seeking affordable housing contributions from small schemes. The first is the use of a sliding scale for affordable housing targets from smaller developments which have capacity for 15 or fewer additional homes. The sliding scale has been designed to achieve the maximum reasonable contribution overall without deterring development, causing delays to decision-making, increasing the burden of financial viability appraisals, or risking creation of a high starting target that supresses scheme or dwelling size. More information about the operation of the sliding scale is provided in paragraphs 7.114 to 7.117. The other relevant characteristic is that the Council will continue to provide flexibility for payments-in-lieu of affordable housing from the smallest developments (those involving with capacity for fewer than 10 additional homes).

7.111 The case for seeking affordable housing contributions from schemes below the national threshold is undiminished. Camden's Local Housing Needs Assessment indicates that around 60% of the anticipated housing supply would be required to meet the need for low-cost rented housing. Similarly, the Camden Strategic Housing Market Assessment 2016 (SHMA) found a need for 10,200 affordable homes from 2016 – 2031, being 61% of the overall housing requirement for the period. Based on the SHMA, and the factors determining likely delivery set out in paragraph 7.106 above, the Camden Local Plan 2017 set a target for delivery of 5,300 additional affordable homes from 2016-31. Over the first five years of that Plan period (2016-2021), 923 additional affordable homes were delivered in Camden, which was 27% of the five-year need (3,400) indicated by the SHMA, and 52% of the five-year target (1,767) set out in the Local Plan.

7.112 For the purposes of Policy H4 we will treat proposals for small houses in multiple occupation (Use Class C4) in the same way as proposals for self-contained homes (Use Class C3) and seek provision of affordable housing from major developments, and non-major developments for one or more additional small houses in multiple occupation where they involve a total addition to housing floorspace of 100 sqm GIA or more. This reflects the freedom provided in legislation for changes between these uses without a planning application. We will also seek provision of affordable housing from proposals for live-work units in the same way as proposals for self-contained homes (Use Class C3) where they involve major developments, or at least one additional home and 100 sqm GIA additional housing floorspace is provided, except that our assessment of the affordable housing target/ delivery will exclude any spaces which are to be protected exclusively as work areas through a planning obligation.

Basis for seeking affordable housing provision from specific proposals

7.113 Given the scale of affordable housing need in the borough, the Council aims to maximise the supply of affordable housing from each development site, having regard to the London Plan's 50% strategic target, and this Plan's delivery target for 3,000 additional affordable homes. The criteria in Policy H4 Part B provide a common basis for negotiations while criteria in Part E set out factors that will determine what is reasonable in any particular case. The following paragraphs outline the operation of criteria in Part B, while the subsequent section outlines criteria in Part E. Our Camden Planning Guidance on housing provides more detailed guidance on the operation of the criteria.

Negotiating contributions from smaller developments using the sliding scale

7.114 Our criteria for negotiating the proportion of affordable housing from specific schemes distinguish between smaller developments with capacity for 15 or fewer additional homes, and larger developments with capacity for 16 or more additional homes. Having regard to the nationally described space standard, the mix of dwelling sizes sought by Policy H7 (Large and small homes), and the ancillary space required (such as common circulation and bin and cycle storage), we consider that developments can achieve an average of no more than 100 sqm GIA per home, and accordingly we will assess the capacity for additional homes on the basis that 100 sqm GIA residential floorspace has capacity for one additional home.

7.115 We will assess the capacity of each development for additional homes on the basis of multiples of 100 sqm GIA, rounding the additional housing floorspace to the nearest 100 sqm GIA so the assessed capacity will always be a whole number. For example, we will generally consider an additional 473 sqm GIA to have capacity for 5 additional homes, an additional 1,239 sqm GIA to have capacity for 12 homes, an additional 1,457 sqm GIA to have capacity for 15 homes, and an additional 1,648sqm GIA to have capacity for 16 homes. However, we will take into account any constraints on capacity where existing buildings are converted for housing, particularly listed buildings and other heritage assets. The assessed capacity for additional homes will be used to determine the percentage affordable housing required in accordance with sliding scale set out in Policy H4 Part B and paragraphs in this section.

7.116 A sliding scale target will apply to smaller schemes involving one or more additional homes. The sliding scale starts from a target of 2% where there is capacity for 1 additional home, and increases on a 'straight-line' basis. Capacity for each further additional dwelling (or each 100 sqm GIA additional floorspace) increases the target by 2%. Thus the target for a scheme with capacity for an additional 5 dwellings is 10%, at 12 additional dwellings the target is 24%, and at 15 additional dwellings that target is 30%. The sliding scale will not apply to larger schemes with capacity for 16 or more additional dwellings.

7.117 We will apply affordable housing targets on the sliding scale directly to the proposed addition to residential floorspace (rather than to the number of homes or 'units' or the capacity for additional homes) to create an affordable housing floorspace target. For example, in the case of a development with an additional 473 sqm (GIA) housing floorspace, the percentage target will be 10%, and the floorspace target will be 47.3 sqm (GIA). For an additional 1,239 sqm (GIA), the percentage target will be 12%, and the floorspace target will be 148.68 sqm (GIA). For an additional 1,457 sqm (GIA), the percentage target will be 15%, and the floorspace target will be 218.55 sqm (GIA).

Larger developments and London Plan Viability Thresholds

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.

7.119 The Council will operate the London Plan viability thresholds prevailing at the time of determining an application, taking into account the proportion of floor area and the proportion of habitable rooms in each tenure. For developments that must be referred to the Mayor under the provisions of the relevant legislation, the proportion of habitable rooms in each tenure will be the primary consideration. The London Plan indicates that where the proportion of affordable housing reaches or exceeds the relevant threshold level, 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.

7.120 The London Plan 2021 sets a viability threshold of 50% for industrial land and most public sector land and a 35% viability threshold in other cases (details appear in London Plan 2021 Policy H5). These viability thresholds may be amended through future London Plans or London Plan guidance, and we will apply the latest thresholds to be formally approved. Considering the 2021 viability thresholds, the 35% threshold will apply to most larger developments involving housing that come forward in Camden. This dovetails well with the sliding scale for smaller developments, as an affordable housing target of 30% will apply to proposals with capacity for 15 additional homes, whereas a viability threshold of 35% will apply to most proposals with capacity for 16 or more additional homes.

7.121 Where a development is subject to Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) and the floorspace sought for self-contained housing has capacity for 16 or more additional homes, we will apply the London Plan viability thresholds in association with the prioritisation of delivery of affordable housing set out in Policy H2 and its supporting text. Where a viability threshold below 50% applies, the Council will generally encourage development to deliver solely the full 50% strategic target of affordable housing as an alternative to delivering the full target level of self-contained housing alongside a lower viability threshold level of affordable housing, but will negotiate having regard to the quality and mix of affordable homes that can be achieved.

Guideline mix of affordable housing types

7.122 As indicated in paragraph 7.105 earlier, Camden's Local Housing Needs Assessment suggests that as much as 60% of our anticipated housing supply would be required to meet the need for low-cost rented housing. There is also a need for intermediate housing (between the cost of social rented housing and market housing), which has some potential to retain middle income households in Camden and lessen social polarisation. However, high values in many parts of the borough mean that the intermediate housing can be more expensive than the cheaper market housing available elsewhere. To balance these considerations and take account of the relative needs found by Camden's Local Housing Needs Assessment, the Council has set guideline percentages for the split of affordable housing types at 60% low-cost rented housing (homes for Social Rent or London Affordable Rent) and 40% intermediate housing.

7.123 Intermediate housing for shared-ownership, First Homes, and other forms of affordable home ownership can help households into owner occupation, but in Camden it is rarely possible for providers to deliver housing of these types that would be affordable for households with incomes close to the borough median, and highly challenging to deliver schemes that comply with the maximum eligible income and price cap set out in the London Plan and national guidance. Given these constraints, we will strongly encourage provision of homes for intermediate rent. We will also encourage the development of innovative intermediate housing products that can be made affordable to a wider range of groups in Camden, including innovative forms of affordable home ownership.

7.124 The guideline mix will be applied flexibly taking into account the criteria in Policy H4, and in certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing. We will encourage a focus on low-cost rented housing where a proposal falls far short of the affordable housing target (e.g. below 30% affordable), or intermediate housing cannot be delivered for people in a range of incomes below the London Plan thresholds. Where a proposal substantially exceeds the affordable housing target (e.g. over 65% affordable), or involves the loss of key-worker housing such as a nurses' hostel, the Council may support development that only provides intermediate housing, and may also support development to meet the needs of a particular group (e.g. development by an NHS Trust for key health service workers).

Assessment of the affordable housing percentage on the basis of floorspace and habitable rooms

7.125 The Council has been assessing the percentage of affordable housing in housing developments on the basis of floorspace since the adoption of the Camden Core Strategy and Camden Development Policies in 2010. Our previous experience of assessment based on the number of homes indicated that it encouraged developers to deliver the smallest possible affordable homes in order to minimise their impact on the development's financial value, rather than delivering affordable homes of the size most needed. Similar thinking has informed the use of habitable rooms in the London Plan 2021 to assess housing developments against the relevant viability thresholds.

7.126 Policy H4 continues to consider the percentage of affordable housing on the basis of floorspace to enable us to achieve an appropriate range of affordable dwelling sizes to meet the borough's needs. Camden's Local Housing Needs Assessment indicates that the predominant need for low-cost rented housing is from households requiring 3 bedroom homes, but that there are also substantial needs from households requiring 2 bedroom homes and those requiring 4 bedrooms or more. Our own data based on the Housing Register indicates that households requiring larger homes (particularly those requiring 4 bedrooms or more) face the longest wait for a suitable home to become available.

7.127 Further evidence of the need to provide large affordable homes in Camden is provided by the 2021 Census, which indicates that Camden's housing stock is skewed towards 1 and 2 bedroom homes, particularly the rented housing stock. Specifically, 72% of households in Social Rented housing occupied 1or 2 bedroom homes, while only 28% occupied homes with three-bedrooms or more. The 2021 Census also allows us to consider overcrowding in terms of households with a bedroom occupancy rating of -1 or less – effectively those requiring at least 1 additional bedroom. This measure indicates that in 2021, 19.7% of households in Social Rented housing were living in overcrowded homes, compared with 5.7% of those in the private rented sector and 2.8% of those in owner-occupation.

7.128 When considering the proportion of affordable housing proposed, and the proportions of different types of affordable housing (usually low-cost rented housing and intermediate housing), the Council will take account of gross internal area (GIA) or net internal area (NIA), depending on the nature of the scheme and the most reasonable measure for comparison. In some cases, common areas may potentially be shared between tenures (such as cycle stores and bin stores), making it simpler to measure the NIA for a single tenure. However, in some cases, market housing may contain communal facilities such as resident gyms, which add to the value of the market homes, and make GIA a more reasonable method of comparison.

7.129 In connection with the viability threshold approach, the London Plan indicates that the percentage of affordable housing should be considered in terms of habitable rooms. The Council will consider habitable rooms alongside floorspace, and accepts that habitable rooms may provide a helpful method of comparison in some circumstances, such as where a development of purpose-built student accommodation offers self-contained affordable homes rather than affordable student accommodation. However, there are distinct drawbacks to the habitable rooms measure, particularly in view of severe overcrowding of Social Rented housing and the high value of market housing prevailing in Camden.

7.130 In relation to overcrowding, and to accommodate growing families, the Council seeks to ensure that wherever possible (in addition to the main bedroom), any second bedroom in low-cost rented housing is able to accommodate 2 people (e.g. 2-bedroom 4-person homes and 3-bedroom 5-person homes). The habitable rooms measure discourages developers from providing second bedrooms suitable for 2 people as it fails to take the size of the rooms into account, so the additional cost of larger bedrooms is not recompensed by acknowledgement of a higher percentage of affordable housing. Conversely, many properties in Camden are in high value or prime residential markets, and are developed with exceedingly large habitable rooms compared with their counterparts in affordable homes – but under the habitable rooms measure, the additional value arising from large rooms in market housing does not lead to any commensurate increase in the affordable housing sought. A further drawback of the habitable rooms measure is that an open-plan living and dining room or an open-plan living room, kitchen and diner will count as a single room, discouraging the adoption of open-plan layouts for affordable homes even where it is the best way to ensure a good level of natural light for each component.

7.131 Taking these drawbacks of the habitable rooms measure into account, the Council will adopt floorspace as the primary measure of the percentage of affordable housing in most circumstance. However, as indicated in paragraph 7.119, 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 measure.

Provision of affordable housing for people with care or support requirements

7.132 Policy H4 provides for the Council to seek affordable housing to meet the particular needs of older people, or other people with care or support requirements, in association with the largest developments involving housing. Typically, we will seek to meet these particular needs from developments involving 100 homes or more, but we will negotiate having regard to the characteristics of the site, any aspects that would make the site particularly appropriate to meet the requirements of a specific group (e.g. the ability of the location to fill gaps in existing provision, or proximity to existing facilities serving that group, such as the Greenwood Centre for Independent Living), and the capabilities of any Registered Provider expected to take transfer of the affordable housing.

7.133 As indicated in association with Policy H8 (Housing for older people, homeless people and other people with care or support requirements) and supporting paragraphs, the Council will focus on meeting care and support needs by providing support in existing homes (with adaptations where necessary), but new supported living accommodation may be needed for some groups such as people living with dementia and people with learning disabilities. We anticipate that a proportion of any new provision would need to be in the affordable sector, but the distinctive viability characteristics of supported living mean that affordable provision is unlikely to be delivered in conjunction with market-led supported living. We will seek provision primarily in schemes involving 100 homes of more, as such schemes offer potential for affordable homes for people with care or support requirements to be clustered and benefit from coordinated support. In considering whether affordable housing should be sought for people with care or support requirements, and the scale and nature of provision, the Council will also take into account all relevant criteria in Policy H4 (Maximising the supply of affordable housing) and Policy H8 (Housing for older people, homeless people and other people with care or support requirements).

Whether the affordable housing should be provided on-site

7.134 The NPPF indicates that where affordable housing is needed, policies should set out to meet this need on-site. However, the NPPF also indicates that provision of affordable housing should only be sought from major development involving housing, and consequently our approach to seeking affordable housing from smaller developments represents a local departure from national policy in some cases. Recognising this departure, we will provide flexibility for the smallest developments to provide the affordable housing contribution in the form of a payment-in-lieu.

7.135 The Camden Local Plan 2017 provided for payments-in-lieu of affordable housing to be accepted as a matter of course from proposals with capacity for fewer than 10 additional homes (i.e. a floorspace below 1,000 sqm GIA when rounded to the nearest 100 sqm), and we intend to continue this practice will continue. We consider payments-in-lieu are appropriate for these smallest schemes (in tandem with relatively modest floorspace targets based on the sliding scale) as the affordable housing required would rarely be equivalent to a whole dwelling, and the obstacles to on-site delivery would generally exceed the benefits. More information on payments-in-lieu is provided by paragraphs 7.141 and 7.142. However, we note that in some cases, proposals with capacity for fewer than 10 additional homes will constitute major developments due to the presence of existing housing on the site, and where this is the case we will have regard to the London Plan stipulation that major developments should provide affordable housing on site.

7.136 In line with the NPPF and the London Plan, the Council's strong preference for larger developments is for affordable housing to be provided on-site alongside market housing because this helps to create mixed and inclusive communities and ensure that the delivery of the affordable housing is secured to the same timescale as the market housing. Furthermore, the availability of alternative sites where affordable housing could be delivered is limited.

7.137 The Council accepts that even in the case of larger developments there are some circumstances where it may be appropriate to deliver some or all of the affordable housing off-site. In considering whether off-site provision is appropriate, the Council will consider the criteria set out in Policy H4 and other relevant factors such as whether a greater number of affordable homes could be delivered through an off-site solution, whether it is practical for a single block to accommodate market and affordable homes, and the affordability of the anticipated service charges. Market and affordable housing have been successfully delivered alongside each other on a number of relatively small sites in Camden, and the Council will expect developers to demonstrate that they have worked with affordable housing providers to consider fully whether the development can be designed to provide on-site affordable housing.

7.138 Where a development has capacity for 10 or more additional homes and the Council considers off-site provision is appropriate, the Council will take into account all related sites when assessing how much affordable housing is required. Where a development omits affordable housing, it will be possible to deliver additional market housing on-site, and the Council will expect to achieve a significantly enhanced affordable housing contribution off-site (in terms of quantity, quality and / or affordability), having regard to the market housing proposed across all sites.

7.139 Where off-site provision is appropriate, we will seek development of the affordable housing on an alternative site (or sites) nearby, secured by a planning obligation. Given the intense competition for sites in Camden, the Council will normally expect the planning obligation to ensure delivery of the affordable housing by specifying the anticipated delivery site (or sites).

7.140 All alternative sites must be in the borough, and should be as close to the application site as possible. Where the development is in the defined South Camden sub-area, alternative sites should also be sought in the South Camden sub-area. Where the development is in the Central Camden, West Camden or North Camden sub-areas, sites should initially be sought in the same sub-area as the development, but if no appropriate sites are available in the same sub-area, the Council will subsequently seek sites in any part of the borough outside the South Camden sub-area. In all cases, provided the applicant can demonstrate to the Council's satisfaction that they have undertaken a thorough exploration of options, if no appropriate sites are available in the specified sub-areas, the Council may be prepared to consider sites anywhere in the borough where warranted by the overall benefits of the developments facilitated. As part of the consideration of off-site options we will explore with developers whether the affordable housing could be delivered on Council-owned land.

7.141 Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for affordable housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation. Payments should be based on the difference between: the value of the development as proposed (with no affordable housing, or with less affordable housing than is required by Policy H4); and the value of a similar hypothetical development including the full requirement for affordable housing. This basis ensures that the payment is equivalent to the gain to the developer from failing to meet the full self-contained housing requirement.

7.142 More detailed information regarding the calculation of off-site provision and payments-in-lieu is provided in our Camden Planning Guidance on housing and Camden Planning Guidance on planning obligations, and developers will be expected to have due regard to this. Camden Planning Guidance currently sets a payment rate of £5,000 per sqm (GIA) of omitted affordable housing, based on viability testing a variety of development typologies. This rate will be updated periodically through Camden Planning Guidance to reflect changes in development values and costs. Applicants may also submit their own financial viability appraisal to indicate an appropriate level of payment calculated on the basis set out above. In such cases, the Council will seek funding from the developer for an independent verification of the appraisal.

Estate regeneration proposals

7.143 We will seek the delivery of affordable housing from estate regeneration proposals following the distinctive approach for this type of development set out in Local Plan Policy H5 and the London Plan. Estate regeneration proposals should retain or replace all existing affordable housing (including all existing low-cost rented housing), and be subject to viability testing to determine how much additional affordable housing can be provided. We will consider the types of additional affordable housing provided having regard to the guideline mix of low-cost rented housing and intermediate housing incorporated in Policy H4.

Split sites and related sites

7.144 Where a site or a group of related sites becomes available for development, the Council will expect proposals to take the form of a comprehensive scheme rather than piecemeal development, and will expect a single assessment of the maximum reasonable amount of affordable housing taking account of all components. We will seek to resist schemes that are artificially split into a series of proposals to avoid reaching the affordable housing threshold or the full 50% strategic affordable housing target. Where there are proposals to extend a permitted scheme or increase the housing in the period before or shortly after completion, we will calculate and apply an affordable housing target that reflects the scale of the entire development. We will seek planning obligations to ensure that each part of a split or phased development makes an appropriate affordable housing contribution, having regard to the contribution that would arise from a single assessment across all components.

Build to rent housing, purpose-built student accommodation, and large-scale purpose-built shared living

7.145 Where market-led development of build to rent housing, purpose-built student accommodation or large-scale purpose-built shared living is proposed, we will apply Policy H4 as far as appropriate, having regard to Part D and all specific provisions for these types of housing in this Plan and in the London Plan. In essence, the London Plan provides for: the affordable housing contribution from build to rent housing to take the form of homes for Discount Market Rent; the contribution from purpose-built student accommodation to take the form of affordable student accommodation; and the contribution from large-scale purpose-built shared living to take the form of a payment-in-lieu. The Council will support proposals to offer contributions in accordance with these London Plan provisions, but in view of Camden's shortfall in affordable housing supply when compared to need, as an alternative we will strongly encourage contributions of self-contained affordable housing on-site in accordance with the guideline mix set out in Part B. We note that it will only be feasible to provide the guideline mix where the affordable housing can be provided in a separate block and/ or be accessed from a separate stair/ lift core, rather than being fully integrated into the host development (whether of build to rent housing, purpose-built student accommodation, or large-scale purpose-built shared living).

Achieving an appropriate mix of market and affordable housing types

7.146 Criteria in Policy H4 Part E indicate the factors that we will consider when assessing the mix of market, intermediate and low-cost rented housing appropriate for a site, and whether any off-site delivery of affordable housing is appropriate. Details of how these criteria will be applied are set out in our Camden Planning Guidance on housing (including the assessment of financial viability), but a number of key considerations are set out below.

7.147 Where there is existing housing on a potential development site, this can have a major impact on the viability proposals and the willingness of landowners to bring the site forward, even where there is a prospect of significantly increasing the total amount of housing provided. The presence of existing market homes will tend to increase the development value that needs to be achieved for a proposal to be viable. Any existing affordable housing on the site would need to be re-provided in accordance with Policy H5, creating substantial costs without any corresponding return in terms of additional rents or sales.

7.148 Policy H4 includes a mechanism to overcome this in the case of smaller developments by adopting a sliding scale affordable housing target based on the amount of additional housing floorspace provided. Policy H5 also includes a mechanism to overcome this in the case of estate regeneration proposals by using viability testing to determine the proportion of additional housing that should be affordable. In all other cases, Part E allows us to consider the impact of any existing housing on a scheme-specific basis.

7.149 Having regard to the Self-build and Custom Housebuilding Act 2015 (as amended), the Council encourages provision of self-build and custom-build homes. In particular, we recognise that such homes may sometimes provide a low-cost route to home ownership by providing for future occupier to spread the cost of their home across the development process, or reduce the development cost, for example through their own input to the design or the build and through their choice of contractors and materials. Part E provides for the Council to forego any affordable housing contribution for developments of this type.

7.150 We will assess whether an affordable housing contribution should be sought for self-build or custom-build homes on a case-by-case basis. In accordance with Part B of Policy H4, we will not seek a contribution from schemes which involve less than 100 sqm GIA additional housing floorspace. Conversely, we will expect a contribution from development which fail to optimise the delivery of homes from the site in accordance with Policy H1. In particular, we will expect a contribution from homes which exceed the nationally described space standard (for the relevant number of bed spaces/ occupiers) by more than 50%, or involve a 250 sqm additional housing floorspace or more. To ensure that the development is genuinely intended to assist a specific self-builder or custom-builder, we will seek a planning obligation requiring a contribution if, within three years of completing the home, the self- or custom builder ceases to occupy the home as their principal residence. This arrangement is consistent with the arrangements in CIL Regulations for exemptions in relation to self-build housing.

7.151 Housing for people with care and support requirements, such as older people, may be included in developments as a component of the market housing, or as part of the affordable housing offer where the Council has sought this through Policy H4 Part B. In each case this type of housing is likely to have an impact on the viability of the development (e.g. in terms of whether the value of the homes is derived from sales or rentals, whether care is included as part of housing costs, and the extent to which there are common areas or support areas which do not directly add to development value). Furthermore, such housing may take the form of care homes, which are not generally subject to a requirement to contribute to a discrete element of affordable housing. Consequently, Part E provides flexibility for us to consider whether and how affordable housing should be sought in the light of the specific circumstances of each development involving housing for people with care or support requirements. Further guidance is also provided by Policy H8.

7.152 The character of the development and the size of the site (including the ability to accommodate additional entrances and circulation spaces) will influence whether it can accommodate a mix of market and affordable housing. Factors to be considered include whether existing buildings need to be retained on-site (e.g. heritage assets), whether dual-aspect homes and large homes of 3 or more bedrooms can be incorporated (particularly for low-cost rented housing), and the implications of anticipated service charges on the cost of affordable housing.

7.153 Most areas in the borough also have reasonably mixed and sustainable communities, and include an existing mix of market and affordable housing. However, there are some areas that have a very high proportion of market housing or low-cost rented housing, which may sometimes influence whether on-site or off-site affordable housing is most appropriate, and / or the most appropriate mix of affordable housing types.

7.154 In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability, including the availability of public subsidy, particular costs associated with the development (such as restoration of heritage assets and remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build to rent housing). Subject to the London Plan viability threshold approach, we will expect submission of a financial viability appraisal to justify the proportion of affordable housing proposed and demonstrate that the proposed affordable housing is deliverable, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. The Council will also seek funding from the developer for an independent verification of the appraisal.

7.155 Where financial viability constraints prevent the development from meeting the affordable housing target, and there is a prospect of viability improving prior to delivery, the Council will expect a viability review (or reviews) subject to the London Plan's viability threshold approach, and will seek an increased affordable housing contribution if viability improves over time. For schemes defined by the London Plan as viability tested schemes, the Council will 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.

7.156 Where an early stage or mid-term viability review shows that viability has improved since permission was granted, we will seek additional affordable housing on-site in accordance with the London Plan. Where a late stage viability review shows that viability has improved, we will seek a further financial contribution to affordable housing, not exceeding the payment-in-lieu that would arise from the shortfall between the initial contribution and the affordable housing target. Our Camden Planning Guidance on housing provides more detailed guidance on viability review mechanisms, and developers will be expected to have due regard to this.

7.157 The Council will positively consider alternative approaches to delivering affordable housing as part of development. We will encourage proposals that can better maximise the supply of affordable housing while providing an appropriate mix of affordable housing types, for example by converting existing market housing into affordable housing. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver affordable housing e.g. the impact of including affordable business space for small and medium-sized enterprises (SMEs).

Protecting and improving affordable housing

7.158 Policy H5 seeks to protect all affordable housing floorspace in the broad sense of housing that is provided at less than market costs, whether the reduced cost arises from the nature of the homes, the occupants, or the providers, or a formal affordable housing designation.

7.159 It seeks to particularly protect:

- low-cost rented housing and intermediate housing managed by the Council, Housing Associations and other Registered Providers;
- key-worker accommodation, such as nurses' homes and hostels; and
- other low-cost housing provided in connection with a job, such as a caretaker's flat.

7.160 Other policies in this section also provide more specific provisions protecting particular types of housing as follows:

- housing for older people, homeless people and other people with care or support requirements is protected by Policy H8;
- student housing (known as purpose-built student accommodation) is protected by Policy H9;
- other housing where occupiers do not live as a family but are long-term residents sharing some rooms and / or facilities (larger houses in multiple occupation or HMOs, and large-scale purpose-built shared living) is protected by Policy H10.

7.161 Losses of affordable housing may not always be subject to planning control, for example where the housing is ancillary to another primary use (e.g. a nurses' home provided as part of a hospital), and no change is proposed to the primary use.

Policy H5

Protecting and improving affordable housing

A.	The Council will aim to protect, improve and increase the existing stock of affordable housing in Camden, and to maintain and improve the mix of affordable housing types and sizes.
B.	The Council will resist development that would involve a net loss of any type of affordable housing floorspace.
C.	The Council will work to regenerate existing estates and provide more and better affordable homes through the Community Investment Programme and Better Homes Programme.
D.	We will consider estate regeneration proposals following the approach set out in the London Plan, expecting the retention or replacement of all existing affordable housing in terms of floorspace and / or habitable rooms (including all existing low-cost rented housing) and expecting the maximum viable addition to affordable housing in terms of floorspace and / or habitable rooms, having regard to the guideline mix of affordable housing types in Policy H4 (Maximising the supply of affordable housing).

Loss of affordable housing

7.162 As indicated in Policy H4 (Maximising the supply of affordable housing), Camden has a particularly large requirement for additional affordable homes. However, the number of households living in social rented homes in the borough fell by around 3,000 between the 2001 Census and 2021 Census, widening that gap between need and supply. In the last 25 years there has also been a reduction in the amount of housing provided for nurses and other health service workers. The Council therefore protects existing affordable housing against further losses.

7.163 The existing stock of social rented housing is heavily skewed to 1 or 2-bedroom homes, and overcrowding in the existing stock creates a compelling need for an additional supply of large affordable homes with 3 or more bedrooms. Older accommodation for health service workers often has shared facilities such as kitchens and bathrooms, whereas contemporary demand from key workers is for self-contained accommodation. To take account of this mismatch between supply and demand, the Council seeks to protect affordable housing floorspace rather than each individual affordable home, and will support proposals that adapt affordable homes to fit contemporary and future needs, for example by amalgamating small flats. Where such adaptations take place, the Council will seek to ensure that arrangements are in place to re-house all existing occupiers.

7.164 Redevelopment of affordable housing should generally provide new low-cost rented housing to replace existing low-cost rented homes, and new intermediate affordable housing to replace existing intermediate homes. Where the existing housing is for key workers or provided in connection with a job, redevelopment should provide for the same group of occupiers unless their needs have been met elsewhere, in which case low-cost rented housing and intermediate housing will be sought. The Council will consider the mix of replacement affordable housing types flexibly, and seek to address mismatches between supply and demand, having regard to Policy H4 (Maximising the supply of affordable housing). The Council will also be flexible in considering replacement affordable housing on an alternative site in the same area provided that the replacement housing will contribute to creating mixed, inclusive and sustainable communities.

7.165 Housing and affordable housing required in association with Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes), and Policy H4 (Maximising the supply of affordable housing), should be provided in addition to any retained or replacement affordable housing arising under Policy H5, subject to the particular arrangements for estate regeneration set out in the London Plan and Local Plan Policy H5.

Camden's Community Investment Programme (CIP) and estate regeneration

7.166 The Council launched its Community Investment Programme (CIP) in 2010 to provide new and improved schools, homes and community facilities despite huge cuts in government funding. CIP involves refurbishment of some parts of Council estates, and redevelopment in other parts. It aims to ensure that Council tenants live in good quality accommodation that meets contemporary standards. It also aims to deliver wider benefits by tackling health inequality, helping local residents to take advantage of employment opportunities, and making our communities more sustainable and resilient. Alongside CIP, the Council is also progressing a "Better Homes" programme, which refurbishes existing Council homes.

7.167 By 2022, with the planned CIP works to schools largely complete, the Council decided to expand the Community Investment Programme and refocus on delivery of affordable housing. Over the lifetime of CIP, the Council proposes to deliver 4,850 new homes, of which 1,800 will be new or replacement Council homes, and 350 will be new intermediate homes for rent. Sites identified for CIP estate regeneration proposals are generally allocated in this Plan where they have been subject to local consultation and a formal decision has been made to design a scheme.

7.168 The 2021 Census found that over 10% of Camden's households were renting affordable housing from providers other than the Council (primarily Housing Associations). A number of these providers have a substantial stock of affordable housing in Camden, and have the potential to bring forward their own estate regeneration schemes. Two site allocations in this plan relate to estates of non-Council affordable housing where the provider has advised us that they wish to bring forward regeneration proposals.

7.169 The purpose of estate regeneration is to improve housing conditions and quality of life for existing residents, as well as providing additional homes where possible. Unless additional market homes are provided, substantial costs will arise from refurbishing or replacing homes without any substantial return in terms of additional rents or sales. Consequently, the London Plan recognises that all estate regeneration should be subject to viability testing to determine how much additional affordable housing can be provided. The Council supports this approach, and will not apply the affordable housing targets in Policy H4 to estate regeneration schemes. We will assess the re provision of existing affordable housing and the provision of additional affordable housing in terms of floorspace and/ or habitable rooms in accordance with the measurement arrangements set out in association with Local Plan Policy H4.

7.170 The Community Investment Programme is a long-term strategy, and will involve relocating some occupiers while their homes are refurbished or redeveloped. Over the course of the programme, there may be redistribution of occupiers and of affordable housing floorspace from one part of an estate to another, or even from one estate to another. The Council will take a strategic approach to estate regeneration, taking into account the potential to attract investment and the benefits of creating mixed and inclusive communities. We will resist the loss of affordable housing floorspace across the programme as a whole, but may not resist localised or short-term losses provided a strategy is in place to ensure their replacement.

Housing choice and mix

7.171 The Council aims to achieve mixed, inclusive, sustainable and multi-generational communities in Camden by seeking a range of housing types suitable for households and individuals with different needs.

7.172 Seeking a range of housing types, sizes, accessibility and affordability will help us deliver the Council's missions set out in We Make Camden to meet the needs of Camden's diverse communities by tackling inequality, addressing overcrowding, creating sustainable and resilient neighbourhoods, improving health and wellbeing, and securing a supply of housing suitable for individuals and families on low and middle incomes. As discussed in the paragraphs following Policy H1 (Maximising Housing Supply), the Council also recognises that diversity of housing supply will help us to maximise housing delivery.

7.173 We will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet general and particular needs. Given the limited size and high value of development sites in the borough, it will be challenging to deliver some of the housing types needed in Camden, particularly serviced plots for self-build housing and pitches for Camden's traveller community. Consequently, where larger sites (0.5 ha or greater) do come forward, we will seek the inclusion of provision for particular housing needs, including the needs of self-builders, taking into account the characteristics and constraints of the site and area.

Policy H6
Housing Choice and Mix

A. The Council will aim to minimise social polarisation and create mixed, inclusive, sustainable and multi-generational communities by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs.

B. When negotiating the types of housing included in developments in Camden, we will:

1. apply all relevant elements of design policies and guidance associated with the London Plan and the Local Plan, including Local Plan Policy D3 (Design of Housing);
2. expect all new housing to be accessible, and expect new-build self-contained housing to meet the specific requirements of Parts M4(2) or M4(3) of the Building Regulations in accordance with Policy D3 (Design of Housing);
3. require self-contained housing to include a range of dwelling sizes in accordance with Policy H7 (Large and small homes);
4. seek provision of the types of housing appropriate to meet the particular needs identified by Policies H8 (Housing for people with care or support requirements), H9 (Purpose-built student accommodation), and H11 (Accommodation for travellers);
5. seek a diverse range of housing products in the market and affordable sectors to meet the needs across the spectrum of household incomes;
6. support build to rent developments where this will assist the creation of mixed, inclusive and sustainable communities and comply with all relevant Local Plan policies, including Policy H4 (Maximising the supply of affordable housing), particularly the encouragement in Part D to provide affordable housing in accordance with our guideline mix of 60% low-cost rented housing (homes for Social Rent or London Affordable Rent) and 40% intermediate housing;
7. seek provision suitable for service families and people wishing to commission or build their own homes; and
8. support the creation of additional residential moorings in conjunction with the development of sites adjacent to the Regent's Canal where this is consistent with optimising the use and development potential of the site, the protection and enhancement of the Canal's biodiversity and nature conservation value, the Canal's open space designation, the historic interest and character of the Regent's Canal Conservation Area, and the London Mooring Strategy.

Policy H6
Housing Choice and Mix

C. Where housing is proposed as part of development with a site area of 0.5 ha or greater, we will seek the inclusion of provision for particular housing needs. For such sites, the Council will particularly seek to address the need for serviced plots available to people wishing to commission or build their own homes, but may also support the inclusion of other types of housing to meet the needs identified in Part B. In considering the scale and nature of provision for particular housing needs that would be appropriate, the Council will take into account:

1. criteria in Policies H8, H9, H10 and H11 where applicable;
2. the character and size of the development, and any constraints on developing the site for a mix of housing types including provision for particular housing needs;
3. the impact on creation of mixed, inclusive and sustainable communities;
4. the impact of provision for particular housing needs on the efficiency and overall quantum of development;
5. the economics and financial viability of the development, including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build to rent housing, and any recommendations of an independent viability assessor commissioned to advise the Council; and
6. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

Design and accessibility

7.174 All housing developments coming forward in Camden should meet the requirements of the design policies in the London Plan and the Local Plan, and follow the design guidance associated with them. In particular, Local Plan Policy D3 expects all housing development to create high quality accessible homes. Policy D3 also sets specific accessibility requirements for new build self-contained homes, expecting 10% to be 'wheelchair user' dwellings' and the remaining 90% to be 'accessible and adaptable dwellings'. Accessible homes can support changing needs arising through a family's life cycle, incorporating features to help accommodate pregnancy, prams and pushchairs, injury, and old age, as well as meeting the needs of people with mobility disabilities.

Mix of dwelling sizes

7.175 All developments of self-contained homes are expected to provide a range of dwelling sizes in accordance with Policy H7 (Large and small homes), including some large homes with 3 bedrooms or more, and some smaller homes. The provision of a range of dwelling sizes in each development will provide homes suitable for single people, families with dependent children, and couples without dependent children and help us to foster inclusive and multi-generational communities where residents are able to support their neighbours.

Meeting the particular housing needs of different groups

7.176 The National Planning Policy Framework (NPPF) indicates that planning policies should reflect the housing needs of a range of different groups, including: those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes; and people wishing to commission or build their own homes. The following paragraphs set out how the Plan seeks to address these needs.

7.177 The needs of those who require affordable housing (including homes for Social Rent, as well as homes for London Affordable Rent and intermediate housing) are addressed by Policy H4 (Maximising the supply of affordable housing). Policy H7 (Large and small homes) seeks to address the needs of families with children (including looked after children who are in foster care), as well as the needs of other household types, such as single people and couples without dependent children. Where people have mobility disabilities (including people who use wheelchairs) but do not require on-site care or support, we aim to meet their needs by applying the requirements for accessible housing in Policy D3 (Design of Housing).

7.178 The particular housing needs of a number of the groups identified in the NPPF are addressed by specific policies in the Plan:

- Policy H8 (Housing for older people, homeless people and other people with care or support requirements) seeks to address the housing needs of looked after children (where they are not supported by foster care in a family home), older people (including those who require retirement housing, housing-with-care, and care homes), and disabled people who require on-site care or support, as well as the needs of a number of other groups with care or support requirements;
- Policy H9 (Purpose-built student accommodation) addresses the housing needed for students; and
- Policy H11 (Accommodation for Travellers) addresses the housing needs of gypsies and travellers and travelling showpeople.

7.179 Policy H6 also includes provision for people who rent their homes, service families and people wishing to commission or build their own homes. In addition, Policy H6 responds to the requirement of the Housing Act 2004 (as amended) that local housing authorities should consider the accommodation needs of people residing in houseboats moored on inland waterways. Subsequent paragraphs provide more details about how we will consider provision for each of these groups.

7.180 The Council will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet the general and particular needs of existing and future households. We will consider all the needs identified by Policy H6, including those addressed in detail by Policies H7, H8, H9 and H11. We note that Part B of Policy H6 does not seek to promote the provision of housing with shared facilities (including large-scale purpose-built shared living), which is not a form of accommodation addressed by the NPPF 2024. The Council will support the development of such accommodation where it complies Policy H10 (Housing with shared facilities) having regard to criteria in Part C of Policy H6.

Diversity of housing supply to meet a range of incomes

7.181 The provision of affordable housing (low-cost rent and intermediate housing) and market housing (to rent and to buy) at costs prevailing in the borough will not be sufficient to meet needs across the full range of household incomes of those wishing to live in Camden. There are substantial gaps between the cost of affordable housing (particularly low-cost rent, but also intermediate rented housing) and the cheapest private rents (the lower-quartile), and between the cost of the cheapest private rents and the cost of entering the market for owner-occupation. Local housing allowance (the benefit provided to help with cost of renting) is often insufficient to cover the full cost of privately rented housing.

7.182 These gaps are particularly wide in the case of large homes (with 3 or more bedrooms), with middle-income households (particularly those with children) increasingly squeezed out of Camden due to high housing costs. This leads to social polarisation between lower income households in low-cost rented housing (homes for Social Rent or London Affordable Rent) and higher income households in owner occupation, which is only partly offset by the private rented sector and the modest supply of intermediate housing in the borough. This situation is reflected in changes to the numbers of households of different types over the Plan period projected by our Local Housing Needs Assessment, with the growth focussed on single person households, couples without children, and 'other households' (defined as multi-person households including unrelated adults sharing, student households, mutli-family households, and households of one family and other unrelated adults).

7.183 By increasing the diversity of housing types available in the borough, such as adding to the supply of build to rent housing and purpose-built student accommodation, the Council seeks to provide additional options for households currently competing for the existing stock of private rented housing. By providing alternative housing options for people who would otherwise share a home with other students or unrelated adults, the Council aims to free up relatively low-cost market housing suitable for families with dependent children. Whilst build to rent housing and purpose-built student accommodation tends to be more expensive than lower-quartile rents in the existing private rented stock, they may reduce the competition for existing market homes to rent, and so alleviate the upwards pressure on rents.

Build to rent development and private rented homes

7.184 The private rented sector is currently the largest source of housing for people who are unable to access affordable housing and cannot afford to buy. Private renting is thought to play a significant role in limiting social polarisation in the borough, and the Council will seek to actively foster the sector and support private tenancies for people in housing need.

7.185 The National Planning Policy Framework and the London Plan promote building homes specifically for private rent (build to rent). This is a relatively new housing product, where homes are generally provided at a large scale and managed by a single commercial provider. We consider that build to rent development could potentially help to increase overall housing output in Camden, and could also help to reduce the pressure for occupation of family homes by groups of unrelated adults. However, the turnover of occupiers of private rented housing tends to be rapid (particularly given its popularity amongst young adults and students), so localised concentrations could potentially harm the stability and sustainability of a community.

7.186 Build to rent development may well attract less interest from families than development for market sale, and a different mix of dwelling sizes may be appropriate. Financial viability is viewed differently for build to rent development (compared with developments built for sale) because returns are realised over a longer period, and this may mean that the appropriate level of affordable housing provision is lower. The Council will be flexible in the application of affordable housing and dwelling size policies to development of build to rent housing where we consider such housing will help to create mixed, inclusive and sustainable communities. We consider that build to rent has the best potential to contribute to a sustainable community where leases are available to occupiers for longer periods such as 2-5 years and a long-term commitment is in place to secure the management of the private housing element as rented accommodation. To address the form of leases available, ensure a long-term commitment to private rent, and otherwise secure high quality build to rent development, the Council will apply all relevant London Plan provisions for this sector, but will strongly encourage contributions of on-site affordable housing (low-cost rented housing and intermediate housing) in accordance with the guideline mix set out in Policy H4.

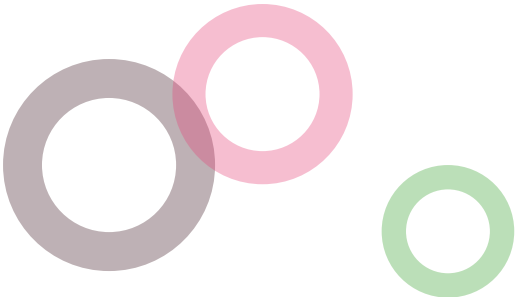
7.187 As indicated in association with Policy H4, the London Plan provides for the affordable housing contribution from build to rent housing to take the form of homes for Discount Market Rent. The London Plan seeks the provision of homes for Discount Market Rent in the form of a specific intermediate housing product known as London Living Rent, and aims for at least 30% of the homes for Discount Market Rent to be let at London Living Rents. As set out in the paragraph above and in Policy H4 Part D, the Council strongly encourages an affordable housing contribution from build to rent housing in accordance with the guideline mix of low-cost rented housing and intermediate housing, but as an alternative will apply the distinctive affordable housing provisions of the London Plan, including the provisions for homes for Discount Market Rent.

7.188 Where a developer opts to provide affordable housing in the form of homes for Discount Market Rent and London Living Rent, the Council will expect the homes for London Living Rent to be made available to households on our Intermediate Housing Register of Interest, in accordance with the Council's Intermediate Housing Strategy. The Council may also seek to negotiate nominations to a proportion of the homes for London Living Rent. Nominations would be of single people or households with an acknowledged housing need, potentially including people accepted by the Council as homeless, people in temporary accommodation and care-experienced young adults.

Service families

7.189 The National Planning Policy Framework (NPPF) indicates that councils should plan for a mix of housing to meet the needs of various groups including the needs of service families. The government has made a number of commitments regarding housing members of the armed forces, including a requirement for councils to give additional preference to seriously injured service personnel who have urgent housing needs, referral schemes with a number of housing associations, tailored low-cost home ownership schemes and assistance for necessary adaptations for injured service people.

7.190 The Regent's Park Barracks occupy a site in the South sub-area of the borough, and are understood to be home to a number of Camden's service personnel. Council Tax records indicate that there are 15 flats on the site and 1 property with a combined residential and non-residential use. Where the housing needs of members of the armed forces and their families are not met by forces accommodation, we consider that their needs can be met by giving them appropriate priority in the allocation of the housing intended to meet the needs of the wider community. Camden's Local Plan policies seek provision of affordable housing, including low-cost rented housing and intermediate housing, and also seek housing to suit people with mobility disabilities and other care or support requirements. Through the housing allocation scheme for low-cost rented homes, the Council gives additional preference to current and former members of the armed forces with a recognised housing need. The Council has also included service families in its priority list for intermediate housing.



People wishing to commission or build their own homes

7.191 The NPPF indicates that councils should plan to meet the needs of people wishing to commission or build their own homes (also referred to as self build and custom housebuilding). Typically, people from this group seek to acquire a serviced plot of land for construction of the home they will occupy. Self-build generally refers to people who bring their own building skills to bear as part of the construction process, whereas custom-build more often involves people who can provide professional services such as architecture or project management. In some cases custom-build can simply involve people who commission professionals to build a bespoke home to personal specifications rather than a speculative home built to a standard design.

7.192 Land costs in Camden are extremely high and the majority of housing output takes the form of flats built at relatively high densities. Consequently, the potential for people to acquire a site and use their own building skills to provide low-cost homes is very limited. However, there is some evidence to suggest that custom-build for wealthier households is quite common in northern parts of the borough with a more suburban character. This sometimes involves infill sites and sometimes redevelopment of an existing residential plot. There may also be some interest in group self-build involving Council-owned land, possibly in association with the Community Investment Programme.

7.193 The Self Build and Custom Housing Building Act 2015 (as amended) requires councils to create and publicise a register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. Camden's register is divided into Part 1 (comprising individuals and households who are longstanding residents of the borough) and Part 2 (comprising those recently resident elsewhere). In February 2025, there were 5 individuals or households registered on Part 1 and 2 individuals or households registered on Part 2. At that time, there were no associations on the register.

7.194 Through the Housing and Planning Act 2016, councils are required to give permission for enough serviced plots to meet the demand for self-build and custom-build homes indicated by Part 1 of the register. The Act also provides a mechanism for councils to seek an exemption from this requirement. On the basis of Community Infrastructure Levy data, we are aware that self-build relief is given each year for a small number of newly permitted homes, some involving replacement of an existing dwelling, and others involving infill between existing homes.

7.195 There are no large areas of unused, underused or cleared land in Camden that would provide an immediate opportunity to create serviced plots. Furthermore, self-build and custom-build housing are likely to involve low density development, which would make it very hard for a prospective self-builder to compete with other developers to acquire land, and would also represent an underuse of land in many parts of Camden, in conflict with Policy H1 (Maximising housing supply) and London Plan policies relating to good growth and design. Given these constraints, beyond opportunities arising from individual infill plots (generally too small to be included in the Plan as allocated sites), the Council considers that the best prospect for bringing forward suitable land will be in conjunction with the development of a large site involving other types of housing, and has made provision in Policy H6 for development of sites of 0.5 ha or greater to include serviced plots for self-build and custom-build.

Residential moorings

7.196 The Housing Act 2004 (as amended) requires local authorities to consider the accommodation needs of people residing in houseboats moored on inland waterways. Camden's only navigable waterway is the Regent's Canal, which traverses the Central and South sub-areas of the borough from Regent's Park to King's Cross. The Regent's Canal is a metropolitan site of importance for nature conservation (SINC), is a designated open space, and is also at the heart of the Regent's Canal Conservation Area. Both the SINC and the open space include the towpath and some further elements of the banks (although the areas designated are not identical), whilst the Conservation Area extends more widely to include other parts of the Canal's historic context.

7.197 On the basis of data from the Valuation Office Agency, we understand there are fewer than five permanent residential moorings in the borough, split between Granary Moorings (to the east of St Pancras Hospital, Allocation S8), and the Cumberland Basin adjacent to Regent's Park. The only other basin in Camden is adjacent the Midland Main Line railway at Camley Street. This facility is operated by the St Pancras Cruising Club, and provides non-residential moorings only.

7.198 The Canal and River Trust is a charity which maintains canals and navigable rivers in England and Wales. In 2018, the Trust published the London Mooring Strategy to manage growth in the number of boats moored in London's waterways. Overall, the strategy seeks to relieve pressure on moorings in busier parts of the network such as the Regent's Canal by creating short-stay visitor moorings and increasing the monitoring and management of existing moorings, whilst indicating that there is greater potential for additional moorings in quieter parts of the network such as the Grand Union. The strategy also identifies potential to reinstate long-term moorings on the bank opposite the towpath and adjacent to Goods Way at King's Cross.

7.199 Part B8 of Policy H6 seeks to achieve an appropriate balance between the aspiration for additional residential moorings, maintaining the Canal's value from an open space, biodiversity and historical perspective, and ensuring that waterside land is used efficiently. In applying the policy, the Council will seek to ensure that housing delivery is optimised on waterside sites in accordance with Policy H1, and the overall number of homes provided is not compromised in order to deliver a modest addition to the supply of residential moorings.

Achieving an appropriate range of housing types to address diverse needs

7.200 For sites with an area of 0.5 ha or greater, criteria in Policy H6 Part set out the factors the Council will consider in determining whether to seek the inclusion of serviced plots available to people wishing to commission or build their own homes, and whether to encourage or support the inclusion of homes suitable to address any other particular needs. The first criterion notes the Local Plan's specific policies addressing housing for people with care or support requirements, purpose-built student accommodation, housing with shared facilities including large-scale purpose-built shared living, and accommodation for travellers. The remaining five criteria are essentially the same as the final five criteria employed in Policy H4 Part E, and which help us in that context to consider how developments can best contribute to the provision of affordable housing.

7.201 The criteria are explained in detail in the paragraphs supporting Policy H4, so their content is not repeated here. However, there are a number of factors that may be particularly relevant to homes intended to meet particular needs, including:

- whether housing to meet any particular housing need or needs can be effectively incorporated and managed in the context of the wider development proposed;
- whether the area around the development currently has a shortfall in housing to meet any particular housing need or needs, or has sufficient and appropriate provision to meet anticipated requirements across the Plan period;
- whether the introduction of housing to meet any particular housing need or needs would cause undue harm to the density of development and the optimisation of housing delivery on the site;
- whether the viability characteristics of housing to meet any particular housing need or needs are compatible with the viability characteristics of the wider development and the overall financial viability of developing the site; and
- whether the development can more effectively contribute to meeting particular housing needs through an alternative approach (rather than delivering suitable housing to meet those needs on-site).

Large and small homes

7.202 Policy H7 seeks to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce the imbalance between housing needs and existing supply.

7.203 Policy H7 (Large and small homes) seeks a mix of dwelling sizes where the following types of housing are proposed:

- self-contained houses and flats (Use Class C3);
- houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and/or facilities (small houses in multiple occupation or HMOs, in Use Class C4, but can change to Use Class C3 without a planning application under the freedom provided in legislation); and
- live / work units, which are self-contained homes that include a dedicated work area (not in any planning use class, but we will treat them as Use Class C3 when we apply Local Plan policies).

7.204 Policy H7 applies wherever there is development that affects the mix of dwelling sizes for these housing types, whether the development involves construction of new buildings, extensions, alterations, conversions or changes of use, or includes the creation of separate homes from ancillary residential accommodation.

7.205 Policy H7 does not apply to development intended to meet the particular needs addressed by Policies H8, H9, H10 and H11, such as housing for older people and purpose built student accommodation.

Policy H7
Large and small homes

A. The Council will aim to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce the imbalance between housing needs and existing supply.

B. The Council will seek to ensure that all housing development including the conversion of existing homes and non-residential properties:

1. includes a mix of large homes (homes with three bedrooms or more) and small homes (studio flats, 1-bedroom and 2-bedroom homes); and
2. contributes to meeting the Dwelling Size Priorities set out in Table 9 below.

C. The Council will seek to maintain and augment the stock of market homes with three bedrooms by:

1. resisting the loss of three-bedroom market homes from development involving existing housing, particularly where the homes have direct access to external amenity space; and
2. expecting provision of at least one three-bedroom home from development that sub-divides an existing large home (with three bedrooms or more).

D. The Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, where the applicant can justify this having regard to:

1. the distinct Dwelling Size Priorities for each tenure set out in Table 9 below;
2. any evidence that borough-wide priorities differ from needs in a particular area or the needs relating to a particular sector such as build to rent development;
3. the existing mix of dwelling sizes in the area, and the impact of large homes on child density;
4. the character and size of the development, and any constraints on developing the site for a mix of homes of different sizes;
5. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build to rent development, and any recommendations of an independent viability assessor commissioned to advise the Council; and
6. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.

7.206 Camden's Local Housing Needs Assessment calculates the likely requirement for homes of different sizes in different tenures based on the projected household composition over the Plan period, projected household incomes, and the size/ tenure of dwelling that each household type would require. It indicates that the greatest requirement for market housing is likely to be for 3 bedroom homes followed by 1 bedroom homes. The greatest requirement for low-cost rented housing (homes for Social Rent and London Affordable Rent) is likely to be for 3 bedroom homes followed by both 2 bedroom homes and homes with 4 bedrooms or more.

7.207 The Dwelling Size Priorities in Table 9 have been guided by the outputs of the Local Housing Needs Assessment and evidence from Camden's Housing Register (waiting list) and Intermediate Housing Register of Interest, considered alongside the mismatch between the need for large affordable homes (indicated by overcrowding) and supply (indicated by average number of bedrooms per household), the cost constraints on delivering large intermediate homes, the priorities included in the Camden Local Plan 2017, and the potential for households to be displaced into rented market housing by the undersupply of intermediate housing. Dwelling sizes are expressed in terms of number of bedrooms and distinct priorities are identified for market housing, intermediate housing, and low-cost rented housing (homes for Social Rent or London Affordable Rent).

7.208 The Council acknowledges that there is a need and / or demand for dwellings of every size shown in Table 9: Dwelling Size Priorities. The Council expects most developments to include some homes that have been given a medium or lower priority level. However, we have prioritised some sizes as high priority (primarily based on a high level of need relative to supply). The Council will expect proposals to include some dwellings that meet the high priorities wherever it is practicable to do so. For low-cost rented housing we will give particular priority to large homes (with three or more bedrooms).

Table 9 | Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Low-cost rented	lower	medium	high	medium
Intermediate affordable	high	medium	lower	lower
Market	high	medium	high	lower

7.209 The Council recognises that it will not be appropriate for every development to focus on the higher priorities in the Dwelling Size Priorities Table, and will consider the mix of sizes in each development having regard to the criteria in Part D of Policy H7. However, we consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall, in accordance with the first criterion in Part B. Where possible a mix of large and small homes should be included for both the affordable housing and the market housing. To assist the creation of mixed, inclusive and sustainable communities and accord with the first criterion in Part B, the Council will generally resist development proposals for self-contained general needs housing that contain only one-bedroom and studio flats.

7.210 The Camden Planning Guidance on housing (2021) indicates that the Council will aim for at least 50% of low-cost rented dwellings in each scheme to be large homes (3 bedrooms or more), and on the basis of mismatches in the existing stock we expect to retain this aim.

Market homes with three bedrooms

7.211 Camden's Local Housing Needs Assessment indicates that a substantial proportion of the households needing market housing over the Plan period are expected to require 3 bedroom homes. The Needs Assessment also suggests that there is likely to be a significant number of households that need 3 bedroom homes but are unable to access affordable housing and unable to afford market housing to rent or buy. In addition, the Needs Assessment confirms that new-build housing is generally more expensive than existing housing. Consequently, the Council will aim to maintain and add to the number of 3 bedroom market homes within the existing housing stock.

7.212 Where development relates to existing housing (or ancillary residential floorspace), the Council will resist the loss of market homes with 3 bedrooms in accordance with Part C of Policy H7. We will also apply Policy H3 to limit the net loss of homes. Where development would involve conversion of a large home to create additional smaller homes, the Council will expect the converted property to include at least one 3 bedroom home in accordance with Part C of Policy H7. To support families with children, we will particularly resist the loss of 3 bedroom market homes that have direct access to external amenity space, and strongly encourage the provision of external amenity space for new 3 bedroom homes created through conversions.

Flexibility in assessing the mix of dwelling sizes for different tenures

7.213 The Council will be flexible when assessing development against Policy H7 and Table 9: Dwelling Size Priorities. The mix of dwelling sizes appropriate in a specific development will be considered taking into account any distinctive characteristics of the area (in terms of the dwelling sizes needed or already present), and the character and size of the development. The following paragraphs set out a number of the relevant considerations. Please see our Camden Planning Guidance on housing for further details.

7.214 For low-cost rented housing (homes for Social Rent and London Affordable Rent), our high priority need is for large homes with 3 bedrooms. For intermediate housing, only small homes are prioritised. For market homes, there are high priorities amongst small and large homes. Where the characteristics of a development make it impractical to achieve a mix of large and small homes amongst both the affordable housing and the market housing, it may be appropriate to achieve an overall mix by providing low-cost rented housing in the form of large homes and providing market housing in the form of small homes.

Characteristics of the area and consideration of child density

7.215 Our Dwelling Size Priorities have been set considering housing needs and supply across the borough as a whole. It will be appropriate to apply this in most locations as the housing market is generally considered to extend beyond borough boundaries (the Camden Housing Market Assessment 2016 suggested a single market encompassed Camden, Islington, and parts of Brent and Barnet), and the Camden Housing Register and Intermediate Housing Register of Interest operate on a borough-wide basis.

7.216 Nevertheless, there may be circumstances where evidence of local needs and the existing mix of dwelling sizes in the area should be taken into account. This is likely to be the case for estate regeneration proposals, where it may be necessary to accommodate the particular needs of tenants and leaseholders already living on the estate. In addition, the 2021 Census found that the proportion of households living in homes with 3 or more bedrooms was significantly lower in four Camden wards than across the borough. In those four wards (Bloomsbury, Holborn and Covent Garden, Kilburn, and King's Cross), the Council will particularly seek to deliver additional large homes, subject to the other criteria in Part D.

7.217 The 2021 Census indicated that over a third of Camden's households were living in privately rented homes, more than were owner-occupiers. Camden's Local Housing Needs Assessment takes account of the needs of private renters as well as buyers in considering of the need for market homes. However, the Local Housing Needs Assessment indicates that build to rent homes typically cost more than median rents found across the wider market rented sector. Accordingly, the needs best met by build to rent developments may differ from our priority needs for market housing (to rent or buy), and the Council will consider any evidence submitted in relation to the households seeking accommodation in the build to rent sector.

7.218 When considering the proportion of larger homes, we will have regard to the needs of families with children, and also the flexibility that larger dwellings create for a variety of other household types, allowing for arrangements such as households sharing, or a household caring for elderly or infirm relatives. The Council will take account of any features that make the development particularly suitable for families with children. Child-friendly features include:

- the potential to provide space on site where children can play (open space or private amenity space);
- dedicated children's play space available nearby;
- a number of homes with direct access to the street, external private amenity space or open space;
- no direct access to a major road;
- a limited number of homes served from each internal corridor and each communal staircase or lift; and
- potential to provide a broad range of dwelling sizes in the development appropriate for new families with very young children and established families with older children.

7.219 There are relatively few opportunities in Camden for housing development that will provide more than one or two of these features. Where a number of these features are present, we will expect the inclusion large homes, and particularly seek the inclusion of large low-cost rented homes. The Council does not consider that the absence of any or all of these features would justify the omission of large homes from a development, unless other criteria in Policy H7 would also support their omission.

7.220 The inclusion of a high proportion of large homes in a development can create high child densities, particularly a high proportion of large low-cost rented homes. High child densities can cause difficulties in some circumstances, typically where large numbers of children in the same age-group are growing up in a single block or in a location with limited safe external recreation space. The Council will take account of existing child densities in an area and the likely child density of the proposals and consider whether mechanisms such as a sensitive lettings policy should be used to manage child density, or whether a relatively low proportion of large homes would be appropriate.

Character and size of the development

7.221 Flexibility may be needed in the application of Policy H7 where the development concerned is small, or involves conversion of an existing building. Having regard to the aim in Policy H1 to optimise the homes delivered on each site, the most appropriate outcome for some small sites may be development focussed on a single dwelling size. In addition, any on-site target for affordable housing may be too limited to support an independent affordable housing core, or the inclusion of both low-cost rented housing and intermediate housing. In such cases, we will prioritise the inclusion of low-cost rented housing with direct street access, ideally including a large home or homes, or otherwise two-bedroom homes suitable for four occupiers.

7.222 Flexibility around dwelling sizes may also be required to achieve a rational layout and the best possible accessibility arrangements. Adjustments to the mix may be appropriate to satisfy design and amenity concerns, such as minimising noise disturbance between flats – see also Chapter 12 of the Plan on design and heritage. Considerations include ease of access to stair and lift cores, corridor length, the floor area taken up by circulation space, and the stacking of flats to avoid conflict between living areas and sleeping areas.

7.223 Where a development involves reuse of an existing building, this may limit the potential to provide a range of dwelling sizes. Issues that can arise include the creation of access via an existing staircase or lift, consideration of the integrity of existing structural walls and patterns of windows, changes in floor level, and significant features in heritage assets (including listed buildings and conservation areas) that may restrict alterations.

7.224 Whilst acknowledging that the re-use of existing buildings can impose some limits in the range of dwelling sizes that can be achieved, that Council will apply Policy H7 and the Dwelling Size Priorities set out in Table 9 as far as possible. We will particularly scrutinise proposals for development that involves reconfiguring existing housing (including the creation of separate homes from residential floorspace that is ancillary to another use) to ensure that they improve the range of homes on site to achieve a closer fit to our Dwelling Size Priorities. Where development relates to existing affordable housing, we will expect retention or re-provision of any existing large affordable homes unless the creation of small homes will allow the release of other large affordable homes that are currently under-occupied.

7.225 The Council is working to return vacant properties to use, particularly those vacant for several years. We will use the flexibility in Policy H7 to ensure that any features of the layout which limit the introduction of large homes do not prevent empty properties from returning to use, particularly upper floors above commercial premises.

Financial viability, demand, and the delivery of affordable housing

7.226 As indicated in the paragraphs supporting Policy H1, the Council intends to be flexible in pursuit of its policy objectives, and will take into account the findings of our monitoring of housing supply in the light of economic circumstances. The Council may vary the range of home sizes sought in order to maximise housing delivery.

7.227 Large affordable homes are expensive to build relative to their rental value and are challenging to provide even where grant funding is available, but they are a high priority for the Council and the London Plan. The demand for market homes of different sizes can vary across the borough and change quite rapidly, so that small homes generate higher values per square metre in some circumstances, and large homes generate higher values per square metre in others. The Council recognises that the rigid application of the Dwelling Size Priorities in Table 9 could prejudice the financial viability of a development, and will consider adjusting the mix of dwellings (particularly the mix of market dwellings) in order to maximise the proportion of affordable housing included in each development.

7.228 The Council may support development that exceeds our strategic affordable housing target and provides affordable homes that are a suitable size to meet the needs of a particular group, e.g. intermediate housing designed to provide discount home ownership for first time buyers. When considering such proposals we will operate Policy H7 flexibly having regard to the needs and financial resources of the intended occupiers.

Housing for older people, homeless people and other people with care or support requirements

7.229 Policy H8 relates primarily to housing made available specifically for occupation by older people (people who are approaching pensionable age or have reached it, typically aged 55 years or older) and housing made available specifically for occupation by homeless people or other people with care or support requirements, who need varying levels of support to enable them to live safely and securely.

7.230 In addition, part B of Policy H8 encourages adaptation of homes occupied by older people or other people with care or support requirements to help them remain in their own homes.

7.231 The term 'other people with care or support requirements' refers to a very broad group of people who require some kind of support with their living arrangements. Examples include people using mental health services, people with learning disabilities, looked-after children / care-experienced young adults, people at risk of domestic violence, people with alcohol or drug dependencies, and people leaving prison. Often individuals have multiple support needs, such as people with both physical and learning disabilities, elderly people with a mental illness, and homeless people with a drug dependency.

7.232 Policy H8 adopts the term 'specialised housing' to relate to all housing made available specifically for occupation by older people, homeless people or other people with care or support requirements. Depending on the nature of provision and the level of care and support, housing provided for these groups may also be known as 'supported housing' or 'care homes'. In addition, the London Plan provides a detailed definition of 'specialist older persons housing', which is essentially self-contained housing (usually with a range of communal facilities) where personal care is available but contracted separately. Examples of different types of 'specialised housing' addressed by Policy H8 include:

- sheltered housing - clusters of accommodation where people live independently in self-contained homes and where some support is available, possibly on-site (usually within Use Class C3);
- extra-care housing – also independent living in self-contained homes, but designed to enable provision of additional support as occupiers' needs increase, with on-site care available. On-site facilities may also provide support for residents in the wider community. Shared lounges and other social and leisure facilities are sometimes provided. Care home accommodation may also be included on-site (extra-care homes are usually within Use Class C3, but this may vary depending on the level of self-containment of the homes and the level of care provided);
- care homes where support and care are available 24 hours a day – commonly bedsit rooms with shared lounges and eating – this may involve residential care only, nursing homes staffed by qualified nursing staff, or dual-registered care homes where medical assistance is provided to occupiers that need it (care homes are usually within Use Class C2);
- small supported living schemes – homes shared by no more than 6 people living as a household with support available, sometimes on-site (within Use Class C3); and
- hostels occupied by people with a shared support need (typically more than 6 people), most commonly homeless people (hostels are outside any use class).

7.233 With the exception of part B, Policy H8 does not address homes that may be occupied by older people or other people with care or support requirements, but are not designated for use by these groups. Specifically, other policies deal with:

- hospitals and boarding schools – see Policy SC3;
- hostels aimed at tourists and backpackers – see Policy IE5;
- self-contained housing without on-site care or support (within Use Class C3) – see primarily Policies H1, H3, H4 and H7;
- student housing (known as purpose-built student accommodation) – see Policy H9; and
- accommodation shared by more than 6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (larger houses in multiple occupation or HMOs and other housing with shared facilities, including hostels aimed at groups other than those with care or support requirements) – see Policy H10.

Policy H8

Housing for older people, homeless people and other people with care or support requirements

A. The Council will assist older people, homeless people and other people with care or support requirements to live as independently as possible by:

1. encouraging adaptations that enable them to remain in their existing homes (Part B below);
2. supporting adaptation / replacement of existing specialised housing to meet contemporary needs (Part C below);
3. seeking a proportion of housing and affordable housing in the largest housing developments to meet the specific needs of these groups (Parts D and E below);
4. supporting development of a variety of specialised housing (Part F below); and
5. resisting the net loss of existing specialised housing floorspace (Parts G and H below).

B. We will encourage and support development that adapts existing homes occupied by older people or other people with care or support requirements to enable them to live independently and safely in their own homes.

C. We will support development that adapts or replaces existing specialised housing for older people, homeless people or other people with care or support requirements to meet contemporary needs where this would be consistent with the criteria in Part F of this policy.

D. In accordance with Policy H4 (Maximising the supply of affordable housing), the Council may seek affordable housing to meet the specific needs of older people, or other people with care or support requirements, as a proportion of the additional affordable housing provision from the largest developments (typically those involving 100 homes or more).

E. In accordance with Policy H6 (Housing choice and mix), we may also support the inclusion of housing to meet the specific needs of older people, homeless people or other people with care or support requirements, where housing is proposed as Part of a development with a site area of 0.5 ha or greater and the specialised housing would be consistent with the criteria in Part F of this policy.

Policy H8

Housing for older people, homeless people and other people with care or support requirements

F. We will support development of a variety of specialised housing for older people, homeless people and other people with care or support requirements provided that the development:

1. is targeted towards existing borough residents;
2. meets demonstrable needs of Camden's older people, homeless people, or other people with care or support requirements, in terms of the type of facilities, the level of independence, and the provision of suitable support and/or care;
3. is accessible to social networks, social infrastructure and transport infrastructure appropriate to the needs of the intended occupiers;
4. contributes to creating a mixed, inclusive and sustainable community;
5. protects residential amenity in accordance with Policy A1;
6. meets relevant design requirements of this Local Plan and the London Plan, particularly in relation to accessibility for disabled people;
7. in the case of any market-led development of specialised housing that contains self-contained homes or provides specialist older persons housing (as defined by the London Plan), makes a contribution to the supply of affordable housing in accordance with the London Plan and Local Plan Policy H4; and
8. in the case of any market-led development of care home accommodation (as defined by the London Plan), is provided at costs consistent with the North Central London minimum sustainable bandings, or provides access to a proportion of places for Council-funded residents at a sustainable cost.

G. We will resist development that involves the net loss of existing specialised housing floorspace unless either:

1. the existing housing is shown to be surplus to needs within the borough; or
2. it can be demonstrated that the existing housing is incapable of meeting contemporary standards or providing suitable support and/or care; or
3. adequate replacement accommodation will be provided that satisfies the criteria in Part F of this policy; or
4. the loss of floorspace is necessary to enable the development of housing for the same group that satisfies the criteria in Part F of this policy and is better able to foster independent living and meet any changes in their support and care needs; or
5. the development will otherwise enable the provision of an alternative form of housing, support or care that better meets the objectives of this policy and the Local Plan.

H. Where the Council is satisfied that a development involving the loss of specialised housing floorspace is justified, we will expect it to create an equivalent or greater amount of floorspace for either:

1. an alternative form of specialised housing that satisfies the criteria in Part F of this policy; or
2. an alternative permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate contribution to affordable housing, having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.

7.234 Policy H8 covers homes for a broad range of people who need housing that is tailored to their specific circumstances and provides access to support or care. The numbers of people needing some form of support is expected to increase over time due to factors such as greater identification of conditions such as Autism, and growing numbers of older people with longer life expectancy.

7.235 The Council is currently developing strategies to meet the needs of the various groups of people involved, but common themes across these groups are for the Council to provide 'floating' care and support and adaptations that enable people to remain in their own homes or to live as independently as possible in suitable specialised housing. The Council has established a Shared Lives service, where adults with care or support requirements live in the homes of people who enable them to thrive and lead healthy lives as part of the community. We follow a Housing First approach where possible (providing for people to move directly into homes where they can be supported long-term). We also take a pathways approach to some groups, which involves temporary periods in supported accommodation for people as they prepare for independent living. While a high proportion of needs will be met by enabling people to live in suitable homes in the general housing stock, we anticipate that that some development of specialised housing for people with care or support requirements will be needed to replace unsuitable facilities and cater for a range of diverse needs across the population. To enable new provision to be used by a wide range of residents, including those with multiple and complex support needs, wherever possible it should be Autism-and dementia-friendly.

7.236 Accessibility is often a key issue for older people and other people with care or support requirements. Accessible housing is required by many older people, and people of all ages with a physical disability, including a significant proportion of people with learning disabilities who also have a physical disability. Many other people also benefit from accessibility measures. The Council will seek to maximise opportunities for people to live independently in their own homes by ensuring that all new homes are designed to be accessible and adaptable where feasible, and that a proportion of new homes are wheelchair adaptable dwellings or wheelchair accessible dwellings (homes that are fully fitted out for occupation by a household with a person who uses a wheelchair) in accordance with Policy D3 (Design of Housing). We will also seek to ensure that there are some larger sized wheelchair accessible homes available for people who need to use non-standard wheelchairs. The Council also adapts general needs housing to meet the specific needs of its occupiers. We will aim to make better use of existing adapted and adaptable housing in our borough to meet the needs of people with physical impairments including older people.

7.237 A significant number of older people and other people with care or support requirements, are supported in residential and nursing care homes, many of which are operated by Housing Associations or private providers. Having regard to its duties under the Care Act 2014, the Council seeks to shape the market in care provision jointly with other authorities across North Central London (Barnet, Enfield, Haringey and Islington). More information is provided in the subsequent paragraphs related to older people, mental health, and learning disabilities, and also those related to new market provision and affordable housing requirements.

7.238 The following paragraphs examine six particular need groups and provide an outline of the housing support currently offered to them and their anticipated future needs. There will also be many other groups needing housing support, and the groups outlined are simply those that represent a significant proportion of overall support needs. The identification of future needs is an ongoing process, and those presented here represent a snapshot of current thinking across the relevant services. Over the Plan period, it is likely that the range and scale of needs will change as new evidence and new pressures emerge.

Older people

7.239 Nationally, the number of people over 65 is forecast to grow dramatically over the next 20 years, and the number of people over 85 will more than double. This issue is less pronounced in Camden as the population profile is skewed towards young adults, nevertheless, the number of people aged over 75 is expected to increase by around 40% over the Plan period.

7.240 There is a large stock of sheltered housing in Camden, involving over 1,500 homes managed by the Council or by Housing Associations. This housing often offers very limited support, and is often not well designed for disabled people or for care and support staff to provide assistance. It is likely that a proportion of this stock will need to be adapted or replaced over time to enable its use by residents with support needs. In some cases, sheltered housing may be adapted to provide Extra Care housing.

7.241 Extra Care housing is designed to enable provision of additional care as occupiers' needs increase, with on-site care available. It takes the form of self-contained homes with some communal facilities, such as a shared lounge. It was originally conceived with the needs of older people in mind, but is now viewed as an intergenerational resource. It can often meet needs that would otherwise be met in residential care homes. There are currently around 180 Extra Care flats in Camden, located in five facilities each with 30-40 flats. We anticipate that around 40-45 Extra-Care flats will be needed in the first 10 years of the Plan period. The way in which these are provided could vary depending on the opportunities that arise. Up to 45 flats could potentially be provided in a single carefully managed facility, or alternatively one facility of 30-40 flats could be provided in the first 10 years of the Plan period, with another following towards the end of the Plan period.

7.242 The Council currently supports over 300 older people in care homes with residential or nursing care. Around 200 supported places are outside the borough, but over half are in North Central London. Our aim is to reduce the number of places in low-level care facilities through provision of re-ablement services, care and support at home, and an expansion of Extra Care. We will also seek to commission 20 new nursing care places, either in the borough or elsewhere in North Central London.

Mental health

7.243 The Council supports around 200 places in supported housing in the borough. These are split over many properties, of which one is owned by the Council and the remainder by Housing Associations. Only a quarter of these places are in properties which are wholly fit for purpose. Just under a half are thought to be capable of renovation, and the remaining quarter will need to be replaced. Almost three-quarters of places are for people with high support needs and staffed for 24 hours, 7 days a week. The Council also supports a small number of places outside Camden for people with specialist mental health needs.

7.244 For new and replacement provision, we expect each development to involve 12-15 self-contained flats. Our aspiration is for developments to be accessible to disabled people, provide self-contained flats or flats with en-suite bathrooms, provide adequate space for staff and resident communal space, have inbuilt security features and outdoor open space, and be in an area of low street activity. We anticipate that at least two schemes will be required to replace current provision that is not fit for purpose, and one to accommodate the impact of population growth.

7.245 The Council currently supports 25 places in residential or nursing care homes in Camden for people needing mental health support, and just over 100 places elsewhere. One property in the borough (providing 13 beds) is not fit for purpose, and we anticipate that replacement provision will be required. Population growth could also generate need for a further 35 places in care homes over the lifetime of the Plan. The Council is considering its strategy for meeting future care needs.

Learning disabilities

7.246 The Council supports just under 100 places in supported housing in the borough for residents with learning disabilities. These are split over almost thirty properties, primarily owned by Housing Associations. Many are too small to operate efficiently, lack self-contained flats or en-suite bedsits, and are deficient in access for those with physical disabilities. The Council currently anticipates seeking remodelling of one property to provide four replacement places, and commissioning new development to provide around twelve replacement places. In addition, the Council supports around 30 places outside Camden.

7.247 For new and replacement provision, we expect each development to be accessible to disabled people, provide 4-6 places in individual self-contained flats or en-suite bedsits, and provide adequate space for staff and resident communal space. New provision should be Autism-friendly and suitable for those with complex needs. We anticipate that two to three schemes will be required to replace current provision. In addition, we anticipate that four further schemes will be required in the first 10 years of the Plan period to accommodate new needs, and potentially one or two further schemes in later years. We will also aim to provide a facility with 4-6 beds to provide emergency and respite care.

7.248 The Council currently supports people with learning disabilities in care homes outside Camden. These include around 70 places in residential care homes and 16 in nursing care homes. Nursing care places are secured in North Central London as far as possible.

Autism

7.249 The Council has a duty to provide services for Autistic adults and children. People with Autism that need support often do so because of a co-existing mental health need or learning disability, and many already draw on care and support from services. The Council is carrying out an assessment of current and future needs for Autistic adults and children, but currently expects to focus on ensuring that all new provision of supported housing and care homes is Autism-friendly rather than developing Autism-specific accommodation. We are also considering advice and adaptations we can offer to better support neurodiverse people living in their own homes across all tenures.

Children and young people

7.250 People up to the age of 25 are supported by the Council's service for young people. Children are supported in foster care wherever possible, but the service also supports a 7 bed children's home for 12-17 year olds where no suitable foster carer can be provided. The Young People's Accommodation Pathway provides a variety of support, including support visitors and specialist support for young parents and those with mental health needs. The Pathway provides over 230 beds across almost 30 properties in Camden, mostly owned by Housing Associations.

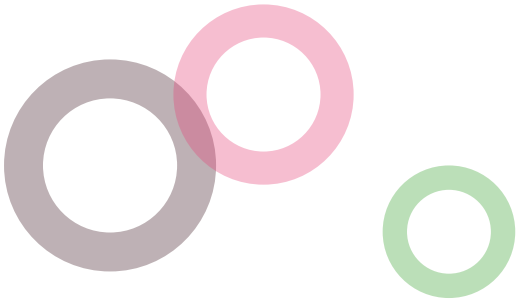
7.251 The Council is to undertake a detailed needs analysis to inform our future strategy. Emerging needs are for a smaller children's home providing therapeutic support for those with complex needs, locally based respite and emergency care for those with complex needs who are aged 18 or under, and an additional facility for young people with mental health needs (the current facility is funded exclusively for former looked after children and care leavers). Challenges we will need to tackle include:

- a high proportion of our needs is for unaccompanied children who are asylum seekers, often with complex emotional needs related to trauma and loss;
- risk of exploitation and abuse;
- placements for children with complex needs are often outside London and very expensive;
- provision for young people in the borough is often in inappropriate and out-dated buildings.

Homeless adults

7.252 The Council works to prevent homelessness, guide households into more settled accommodation, and operates a 'pathway' approach that gradually prepares single homeless people for independent living. For homeless families, the Council's focus is to reduce the need for temporary accommodation by helping families into longer-term housing solutions. The Council is currently supporting more than 600 people in the 'adult pathway', and over 70 people have been supported through Housing First.

7.253 Through the Community Investment Programme (CIP), the Council has been carrying out a series of developments to ensure our supported accommodation for homeless people meets contemporary needs, redeveloping or remodelling and extending facilities where appropriate, and decommissioning the least suitable facilities. Modernised hostels for single people have been provided at Mount Pleasant and Holmes Road. Works are ongoing to replace two small facilities for single homeless people at 248-250 Camden Road and 2 Chester Road with expanded facilities suitable for homeless families. Emerging needs are for a fully accessible purpose-built hostel for people with complex needs and a specialised women-only hostel.



Meeting future needs for Council-commissioned housing support

7.254 To meet the anticipated needs for supported housing services commissioned by the Council, we will need to take advantage of a variety of opportunities. This is likely to involve working with our Community Investment Programme (CIP) or with Housing Associations and other providers. Opportunities could involve adapting or replacing facilities that no longer fit for purpose under Part C of this policy, or encouraging the inclusion of specialised or supported housing on large development sites (those with an area of 0.5 ha or greater) under Part E. We also anticipate that a number of small supported housing facilities could be negotiated as part or all of the contribution to affordable housing through Part D of this policy operating in tandem with Policy H4 for the largest developments involving housing (typically those providing 100 homes or more). In all cases, the appropriateness of new provision will be assessed under the criteria set out in Part F of this policy.

Assessing proposals for new provision

7.255 Part F of Policy H8 sets out basic criteria for assessing proposals of specialised or supported housing. In terms of the Council's market shaping duties under the Care Act 2014 and the protection of existing services in the borough, key issues are the extent to which the proposal is intended to provide for existing borough residents and the fit between the particular care / support service and local needs. New facilities which saturate the local market for a particular type of support can lead to increased levels of vacancy and costs across that sector, and may ultimately lead to the failure of some providers and to the disruption of care and support for residents. Furthermore, facilities that primarily attract residents from other areas who initially fund their own care and support may place severe strain on the Council's budget if the long-proposed personal cap on self-funding is introduced. An example in Camden is the closure of a large nursing care home and establishment of a new service on the site which offers residential care for older people requiring relatively low levels of support. The local market for standard residential care is already saturated, and take-up of places at the new service has been very limited to date.

7.256 Criteria in Part F also address the appropriateness of the location. Key issues include the availability of suitable local networks and infrastructure, the effect of a proposal on the community's mix, and the protection of residential amenity for occupiers and neighbours. Access to social networks and facilities are vital to prevent people with care or support requirements from becoming isolated. A concentration of people who have high support requirements could unbalance the social mix in an area, and in rare cases could create noise and disturbance or otherwise harm the amenity of other residents and neighbours. Conversely, some people with support requirements may be particularly vulnerable to the high or unpredictable levels of noise that can arise in dense urban environments. The location and character of new provision should be such that any risk of conflict between occupiers and neighbours can be minimised and occupiers can contribute to the balance and inclusiveness of community. Where appropriate, the Council will use conditions and/ or legal agreements to control the management of housing for people requiring care or support, and to specify the group or groups that it is intended to support.

7.257 The Council will support proposals for co-housing where this is consistent with Part F of Policy H8 and other relevant policies of the Local Plan. Co-housing is created and run by residents to provide a community encompassing a range of generations. Through the provision of shared facilities, meeting and play areas, co-housing can encourage social interaction and community care for younger and older people. We recognise that opportunities for co-housing in the borough are limited by the high cost of land and the limited availability of sites, but opportunities may be increased through the provision of serviced plots for people wishing to build their own homes under Policy H6 (Housing choice and mix).

New market provision and affordable housing requirements

7.258 The London Plan provides a detailed definition of 'specialist older persons housing', which is essentially self-contained housing (usually with a range of communal facilities) where personal care is available but contracted separately from the occupation of the accommodation itself. The London Plan provides indicative benchmarks for this type of housing to inform local level assessments, and sets a Camden benchmark of 105 additional homes per year up to 2029. There is a growing market for this type of accommodation, and two new schemes have been completed in Camden since 2019, although the local supply is relatively limited at present. The resources older people have to access such accommodation vary considerably depending on whether they own their existing housing, any other assets and investments they have, and whether they have an occupational pension.

7.259 The London Plan indicates that affordable housing policies and the viability threshold approach apply to 'specialist older persons housing'. Consequently, when considering proposals for homes of this type, we will seek affordable provision in accordance with the London Plan and Local Plan Policy H4 (Maximising the supply of affordable housing). In applying affordable housing requirements, the Council will have regard to the distinct viability characteristics of the sector (such as costs and revenues from shared facilities and services, and provisions for termination of a lease), and the potential differences in the character of affordability between people of pensionable age and people of working age.

7.260 In line with the London Plan, we note that the guideline mix of affordable housing types in Policy H4 may not be appropriate for 'specialist older persons housing'. When considering the form of the affordable housing contribution, we will strongly encourage provision of a variety of tenures on-site to suit older people from different backgrounds, such as the inclusion of intermediate housing for those who would otherwise be unable to access specialist older persons housing. However, as an alternative, we will also support the delivery of on-site affordable housing for general needs in accordance with the guideline mix in Policy H4 Part B where this is feasible, having regard to whether developments are able to include separate blocks and / or stair / lift cores for the affordable element. Also in accordance with Policy H4 Part B, where on-site provision would not be practical or achieve the best contribution, we may accept an off-site contribution, or exceptionally a payment-in-lieu.

7.261 The London Plan distinguishes between 'specialist older persons housing' and 'care home accommodation'. Broadly, the London Plan indicates that care home accommodation involves the provision of the personal care and the housing as a joint package, where there is no clear separation between the two. The London Plan also indicates that the activity regulated by the Care Quality Commission is likely to be 'accommodation for persons who require nursing or personal care'.

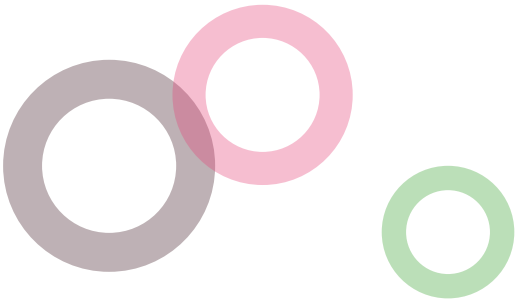
7.262 Neither the London Plan nor Local Plan Policy H4 seek to apply a conventional requirement for provision of affordable housing to 'care home accommodation' as defined in the London Plan. However, we will consider proposals to develop accommodation of this type having regard to the Council's market shaping duties under the Care Act 2014, and our joint arrangement with other authorities across North Central London (Barnet, Enfield, Haringey and Islington). We will also have regard to North Central London minimum sustainable bandings, which are regularly reviewed across the North Central London authorities, and reflect what the Council can sustainably pay to provide funding for care home residents.

7.263 In view of the saturation of the local market for standard residential care, and our assessment of existing and emerging needs in the borough, we will resist further provision of standard residential care, and encourage provision of nursing care and specialist care (e.g. dementia care) at costs consistent with the North Central London minimum sustainable bandings. Where proposed provision would be suitable to meet the needs of Camden residents that are currently unmet, are met in facilities that no longer meet contemporary standards, or are met outside North Central London, we may seek to negotiate access to a proportion of places for Council-funded residents at a sustainable cost.

Protecting existing provision

7.264 In the context of the high land values and limited supply of development sites in Camden, sites that are currently used for specialised housing represent an important resource. Such sites will tend to have a lower existing use value than general needs housing. They are likely to come under pressure for redevelopment for a higher value use, and once lost they will be very difficult to replace. Consequently, the Council will seek to retain these sites in specialised housing use in accordance with Part G of this policy.

7.265 The amount and type of specialised housing required in the borough is changing, for example less sheltered housing will be required for older people with low support needs and more extra care provision will be required for older people needing intensive support. Some of the Council's existing provision is in properties that are not suitable to meet contemporary needs, including much of our provision related to mental health needs and learning disabilities. Where specialised housing is no longer suitable or needed to provide for a particular group of older people, homeless people or other people with care or support requirements, as indicated by Part H of this policy, we will consider whether it could be remodelled or redeveloped to meet the specialised housing needs of an alternative group in the borough. We will also consider whether it could be redeveloped to provide self-contained housing for people in the borough with support needs.



7.266 As also indicated by Part H, where specialised housing is no longer suitable or needed for a particular group, and there are no suitable options to meet alternative needs for specialised housing in the borough, the Council will expect any alternative development to provide an equivalent or greater amount of floorspace in another form of permanent housing meeting general needs. We will prioritise the delivery of self-contained housing in accordance with the priority land-use set out in Policy H1 (Maximising housing supply), but acknowledge that in some cases the design and layout of specialised housing may more readily lend itself to development for a form of permanent housing with shared facilities.

7.267 We will resist the use of specialised accommodation in Camden to meet support needs arising outside the borough since the provisions of the Care Act 2014 mean that any development that attracts additional care users into the borough could have a significant impact on Council resources. In accordance with Policy H1 (Maximising housing supply) and Policy H3 (Protecting existing homes), the Council will resist proposals for non-residential development, and resist the conversion of specialised accommodation with shared facilities (such as hostels for homeless people) into short-term lets or visitor accommodation (such as backpackers' hostels). Hostels do not fall into a planning use class, so the Council will regard any material change to the use (including a change to the type of occupier) as development.

7.268 When considering development for an alternative form of permanent housing to meet general needs, we will expect the housing proposed to satisfy all relevant Local Plan policies, to make an appropriate contribution to affordable housing in accordance with Policy H4, and to retain or replace existing affordable housing in accordance with Policy H5 (Protecting and improving affordable housing). The Council will negotiate the contribution to affordable housing (including retention or replacement) taking into account all relevant criteria in Part E of Policy H4, and any other material considerations.

7.269 We note that until very recently, market-led specialised housing has been developed free from the application of any affordable housing requirements, and also that the stock that is most likely to be decommissioned will often be older accommodation that is best able to provide low-cost places. Consequently, where smaller developments for an alternative form of housing are proposed (with capacity for 15 or fewer additional homes), the Council will apply Policy H4 treating all the housing floorspace proposed as additional housing floorspace. We will also have regard to any need to generate funding to provide replacement housing elsewhere that meets the needs of older people, homeless people or other people with care or support requirements. If replacement specialised housing is provided elsewhere, we will consider the proportion of affordable housing provided across both sites.

Purpose-built student accommodation

7.270 Policy H9 seeks to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds.

7.271 Policy H9 particularly relates to housing that:

- is primarily occupied by students, and managed by an education institution or an independent provider;
- is generally restricted to occupation by students during term-time;
- is generally let to each occupier for the duration of an academic year, and not less than an academic term; and
- provides some common facilities and/or services, although the extent of these can vary.

7.272 Purpose-built student accommodation is the term used by the London Plan to refer to housing that is designed and managed specifically for occupation by students. We have adopted the same term for the Local Plan, but the Council will require student accommodation to comply with Policy H9 whether it is new-build accommodation or converted from other uses, provided that occupation is restricted to students. The Local Plan also uses the term "student housing" as a more concise way to refer to "purpose-built student accommodation".

7.273 Other policies in this plan contain specific provisions for some kinds of housing that may be occupied by students (but occupation is not restricted to students):

- self-contained houses and flats (including build to rent developments) are considered primarily in Policies H1, H3, H4 and H7;
- houses and flats shared by 3 to 6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (small houses in multiple occupation or HMOs, Use Class C4) are treated in the same way as self-contained houses and flats (in Use Class C3) and are considered primarily in Policies H1, H3, H4 and H7;
- other accommodation shared by more than 6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (larger houses in multiple occupation or HMOs, and large-scale purpose-built shared living) are considered in Policy H10;
- key-worker accommodation such as nurses' homes and hostels are considered in Policies H4 and H5; and
- hotels and other visitor accommodation (e.g. serviced apartments, apart-hotels and hostels aimed at tourists and backpackers) are considered in Policy IE5.

7.274 In this plan the expressions "academic term" and "term" refer to a continuous period of classes or learning, whether the year is divided into 2, 3 or 4. The minimum length of a term is usually eight weeks.

Policy H9
Purpose-built student accommodation

A. The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.

B. The Council will seek a supply of student housing to meet or exceed Camden's target of 200 additional places in student housing per year and will support the development of student housing provided that the development:

1. will not involve a disproportionate loss of self-contained homes (particularly homes with 3 bedrooms), having regard to the overall addition to housing supply;
2. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing;
3. complies with any relevant standards for houses in multiple occupation and any relevant residential design standards to provide safe, functional, adaptable and accessible spaces, including shared spaces, outdoor amenity space and laundry facilities;
4. includes a range of accommodation to suit students with differing lifestyles and incomes, including cluster flats where possible;
5. for the full duration of all terms in the academic year, will be secured for students at the Council's recognised higher education institutions, which will generally be those in Camden and adjoining London boroughs that are funded by the Office for Students;
6. will have nominations agreements in place to provide housing for students at one or more recognised higher education institutions, including nominations agreements for any affordable student accommodation incorporated in the development;
7. will be accessible to public transport and will not have a detrimental impact on the transport network;
8. contributes to creating a mixed, inclusive and sustainable community;
9. protects residential amenity in accordance with Policy A1;
10. will be accompanied by a Student Management Plan, and a Non-student Management Plan where alternative uses are proposed outside term-time;
11. will be managed as a single planning unit; and
12. provides affordable student accommodation or otherwise provides an appropriate contribution to affordable housing in accordance with Policy H4, particularly Part D.

Policy H9
Purpose-built student accommodation

C. The Council will resist development that involves the net loss of student housing unless:

1. either it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing;
2. or adequate replacement accommodation will be provided that satisfies the criteria in Part B above;
3. or it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere;
4. and in the case of proposals satisfying points 1, 2 or 3, the development creates an equivalent or greater amount of floorspace in an alternative permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.

7.275 Camden is home to many education institutions of national and international significance, notably 9 publicly funded Universities. In addition, the borough has several other colleges that prepare young adults for higher education, and the Universities have advised that these colleges can support Camden's international academic reputation by helping them to attract students, particularly from overseas. The provision of higher education and research significantly contributes to Camden's ambition for its local economy to be strong, sustainable, and inclusive.

7.276 Camden is also home to approximately 25,000 resident full-time students (almost 6% of the London total). There are approximately 13,000 bedspaces available in purpose-built student accommodation in Camden, while the majority of the remaining resident students live in other forms of rented housing.

7.277 The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year and proposes that at least 35% of new student housing should be let at an affordable rent to nominees from one or more specified Higher Education institutions.

7.278 Over 3,000 additional student rooms were delivered in Camden between 2011 and 2016, but only around 500 rooms were delivered from 2016 to 2024. The interest in developing student accommodation in the borough now appears to be returning, with a number of additional developments permitted and others in the planning process. The main alternative source of accommodation available to students in Camden is private rented housing. The Council considers that the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market.

7.279 Policy H9 sets out criteria that we will use to assess proposals involving student housing, including additions and losses. Details of how we will apply the policy are summarised below and set out more fully in the London Plan 2021 and our supplementary planning document Camden Planning Guidance on Student Housing.

Student housing target

7.280 The overall strategic requirement for purpose-built student accommodation in London was established through the work of the Mayor's Academic Forum, which identified a requirement for 3,500 additional purpose-built student accommodation bed spaces annually over the period of the London Plan 2021. Work has commenced on a review of the London Plan 2021 with a view to its replacement in 2027.

7.281 To calculate the annual target for purpose-built student accommodation in Policy H9, the Council has used the London Plan annual requirement and data for full-time resident students from the 2021 Census (March 2021, students aged 18 and over) and the Higher Education Statistics Agency (academic year 2021/22, students registered at London's publicly funded Higher Education Institutions). We have calculated Camden's share by taking the mid-point of the number of Camden resident students from the two sources, and dividing it by the mid-point of the number of London resident students, and concluded that Camden's resident students were 5.7% of the London total. Applying this to the London Plan 2021 annual requirement generates the Camden target of 200 additional student bedspaces a year adopted by Policy H9 as the minimum borough requirement.

7.282 We will review the Local Plan target as the new London Plan emerges, and will aim to meet or exceed Camden's share of any new London Plan target, based on the updated proportion of London's resident students that are resident in the borough.

Additional student housing and the priority for self-contained homes

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, Camden's Local Housing Needs Assessment indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a three bedroom home. Nevertheless, additional student accommodation contributes towards meeting our housing target (with 2.5 student rooms treated as equivalent to one home), addresses a permanent housing need, and can reduce the pressure for students to share existing large homes. Balancing these considerations, the Council will seek to minimise the loss of self-contained homes with 3 bedrooms, and expect any student housing developments that involve loss of self-contained homes to create a net positive contribution to meeting the borough's housing target.

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 prospect of a viable development for permanent self-contained housing coming forward within the Plan period.

Space standards and quality of accommodation

7.285 Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life, and this is as true for students as it is for the wider population. Student housing should provide residents with a place for rest, relaxation, safety, privacy, and society. The design should include appropriate spaces and layouts that minimise risk to health and safety, are practical, and support adaptability and accessibility.

7.286 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation (HMOs), which apply to most student housing that is not provided by an educational institution. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. The Council will require proposals for student housing to comply with the relevant minimum standards. Drawings accompanying planning applications should demonstrate compliance with these minimum standards.

7.287 In addition to the basic amenities expected from student housing (kitchen and personal hygiene facilities), the Council will expect developments to include shared lounges / recreation rooms, outdoor amenity space and laundry facilities. The Council will also support the inclusion of facilities that are open to the public in appropriate circumstances. Further guidance on the minimum HMO standards and our expectations and benchmarks for shared facilities is set out in Camden Planning Guidance on Student Housing, and developers will be expected to have due regard to this.

7.288 The Council will expect any scheme for student housing to incorporate design measures that promote personal safety and security and reduce the risk of crime and the fear of crime, in accordance with Policy A2 (Safety and Security). Applicants should consider the Secured by Design principles and guides, and should discuss any scheme with Police Designing Out Crime Officers at the pre application stage. All management arrangements related to safety and security should be included within the management plan(s) for the development, secured as a planning obligation.

Wheelchair accessible rooms

7.289 The Building Regulations relevant to the accessibility of new-build student housing are in Approved Document M: access to and use of buildings, volume 2 – buildings other than dwellings. Paragraph 0.16 indicates that purpose-built student living accommodation should be treated as hotel / motel accommodation in relation to space requirements and internal facilities, as set out in paragraphs 4.17 to 4.24 of Approved Document M: volume 2. These include a requirement for at least 5% of bedrooms to be wheelchair accessible. Drawings accompanying planning applications should demonstrate compliance with these standards.

Range of accommodation and cluster flats

7.290 Applicants should include a range of accommodation wherever possible to suit students with different incomes, those desiring space for private study, and those seeking a more collective student lifestyle. Providing a range of rooms and layouts including "cluster-flats" (small clusters of study-bedrooms with a shared facilities such as kitchen-diners) can help to make them attractive to students who would otherwise share private rented accommodation, enhance social interaction, and offer a lower cost rent option and help to meet the needs of the student body as a whole. Where affordable student accommodation is incorporated into the development in accordance with the London Plan, it may well be appropriate for this to take the form of cluster flats. Our Camden Planning Guidance on Student Housing sets out further guidance on the expectations regarding flat layouts, and developers will be expected to have due regard to this.

The institutions to be served

7.291 London's publicly funded universities are part of the national and regional education infrastructure, support London's role as an international centre of academic excellence, and are a key part of the growing knowledge-based economy. Expecting places in student housing to be offered to those at publicly funded universities is a straightforward way for the provider and the Council to ensure that accommodation is only offered to genuine students registered for an academic course of study. Where new student housing is proposed the Council will negotiate planning obligations to ensure that the term-time occupiers are students at our recognised Higher Education Institutions. Limiting non-student occupation to periods outside term-time maximises the potential for students to access accommodation for the duration of their course in each academic year and can help to maintain an appropriate environment for study.

7.292 The Council's recognised Higher Education Institutions are those funded by the Office for Students (OfS) (which regulates higher education providers on behalf of all students and distributes government higher education funding) that have a base in Camden or an adjoining London borough. There are more than twenty of these. The focus on these institutions helps us to support Camden as an academic centre, and also enables students to choose sustainable transport options, as explained in the paragraphs below addressing impact on the transport network.

7.293 The Council will consider providing access to student accommodation for those on courses at publicly funded Higher Education Institutions beyond our neighbouring boroughs where they are well-connected to Camden and sustainable transport options are available. There are a number of other colleges in the borough that are not publicly-funded but help to support London's international academic reputation. In some instances the Council may support development of student housing by these colleges. Further information about how proposals will be considered is provided in our Camden Planning Guidance on Student Housing.

Nominations by Higher Education Institutions

7.294 A nomination agreement is a mechanism which provides for Higher Education Institutions to reserve some or all of the rooms in an independently provided development of student accommodation for occupation by students that the institution has chosen or "nominated". The details may vary, with some institutions seeking only a small number of nominations for as little as a year, and some institutions seeking many more for periods such as five years. In some cases, the institutions may agree to cover the rental cost of their nominated rooms if they become vacant.

7.295 The London Plan expects the majority of the rooms in developments of student accommodation to be subject to nomination agreements with one or more institutions by the time of first occupation, and expects these to be renewed or replaced from year-to-year. The London Plan focuses particularly on securing nomination agreements for any affordable student accommodation incorporated into the development.

7.296 The Council considers that nomination agreements are the best way to ensure that affordable student accommodation is occupied by the students that need it most, and will negotiate for planning obligations to include a commitment to seek nomination agreements for any affordable student accommodation and an appropriate proportion of additional rooms. We also acknowledge that Higher Education Institutions may be less willing to enter into nomination agreements for rooms offered at the full market cost for student rooms, and will take this into account when negotiating planning obligations. The Council may seek nomination rights for a limited number of student rooms to accommodate care-experienced young adults who are studying at our recognised institutions.

7.297 In some cases, developers of student accommodation may prefer to make a contribution to self-contained affordable housing as an alternative to providing affordable student accommodation. The Council encourages this approach through Part D of Local Plan Policy H4.

Impact on the transport network

7.298 Student housing should serve institutions that are within walking, wheeling or cycling distance, or accessible by public transport. Student housing that is remote from the institution that it serves can have a significant impact on a public transport route or service connecting the two sites. Adverse impacts can arise where student housing serves institutions beyond the borough and its neighbours, or where development outside the South Camden sub-area is not well-connected with the cluster of universities in Bloomsbury and the Central Activities Zone.

7.299 To ensure that occupiers of student housing have good access to their place of study, we will seek planning obligations to ensure that the term-time occupiers are students attending the Council's recognised Higher Education Institutions with a base in Camden or an adjoining borough We may also consider Higher Education Institutions in other locations where the transport links to the proposed accommodation are demonstrably capable of supporting sustainable travel choices. Public transport and other services that will support new student housing should have existing or committed capacity to accommodate the demand generated by the development. Funding towards services may be sought through planning obligations as appropriate.

7.300 The Council will expect student accommodation to be designed to comply with the transport policies in this Local Plan. A wide variety of requirements and tools will be applied to ensure that development supports sustainable transport choices, including cycle parking standards, car-free agreements, Travel Plans and Construction Management Plans.

7.301 A Transport Statement or Assessment and a Travel Plan may be required for student housing developments. Camden Planning Guidance on Transport provides two sets of thresholds (based on the size of development) that indicate whether a Transport Statement or Assessment is required, and whether a Local or Strategic Travel Plan is required. For the purpose of the thresholds, one student bedroom will be treated as equivalent to 1 residential dwelling (in Use Class C3).

7.302 A Construction Management Plan (CMP) will also be required for developments involving significant impacts on the public highway or significant excavation. 'Monitoring and measures' financial contributions are required for Travel Plans and CMPs. Transport Assessments and Travel Plans should take account of any proposed alternative uses of the student housing outside term time.

7.303 A financial contribution to walking, wheeling, cycling and public realm improvements will be sought if mitigation measures are required to overcome the impact of the development. A financial contribution to highway works will be sought to repair any construction damage to transport infrastructure and reinstate all affected transport network links and road and footway surfaces.

Creating a mixed, inclusive and sustainable community and protection of amenity

7.304 The creation of mixed, inclusive and sustainable communities can be a particular consideration where student housing is proposed, especially given the high concentrations of such accommodation in some parts of Camden. Students can benefit communities by working part-time in local businesses, helping to staff voluntary services, and spending in local shops. However, students are sometimes perceived as short-term residents with little connection to the established community. Specific concerns can include noise disturbance, over-crowding on public transport, or the loss of shops and services that meet the needs of longer term residents. The Council will therefore assess proposals for student accommodation having regard to any existing concentrations in the area, and the wider housing mix in the community. Our Camden Planning Guidance on Student Housing sets out further guidance about how we will assess concentrations of student housing.

2.305 Policy A1 indicates that we will seek to protect the amenity of the existing and future occupiers and the amenity of neighbours. This protection is as important for the occupiers of student accommodation who wish to pursue their studies as it is to other residents and their neighbours. Where the scale or concentration of student accommodation risks harm the balance and sustainability of the community or otherwise has potential to harm local amenity, the Council will seek a range of mitigating measures such as management plans. Where there is history of negative impacts from student accommodation in the area, and mitigation has been unable to resolve these, we may resist proposals for further development of student accommodation.

Student management plan

7.306 In association with applications for development of student housing, we will seek planning obligations to secure a Student Management Plan, and a Non-student Management Plan where alternative occupiers will be admitted outside term-time. A draft Student Management Plan should be submitted with any planning application for student accommodation to ensure the health, wellbeing and welfare of students and to mitigate any potential impacts of the development on neighbours and the local community. The Student Management Plan should act as a code of conduct that the provider will abide by in managing the student housing.

7.307 Where alternative occupation of the student housing is proposed outside term time, the applicant should also submit a draft Non-student Management Plan with any planning application to mitigate any potential impacts of the non-student use on other occupiers of the development, neighbours and the surrounding area. This should include similar provisions to the Student Management Plan insofar as the provisions are also relevant to the non-student occupation.

7.308 The Council will seek planning obligations to secure Student Management Plans for all student housing developments, and Non-student Management Plans where relevant. Generally, the draft management plans will be appended to the planning obligations, and the Council will require submission of the finalised management plans for approval by the Council prior to the occupation of the development. The Council will also require the development to be managed in accordance with the approved management plans at all times. Further guidance on what is expected to be detailed in a Student and Non-student Management Plan is set out in Camden Planning Guidance on Student Housing, and developers will be expected to have due regard to this.

Management as a single planning unit

7.309 The Council will seek to negotiate to secure management of each development of student accommodation as a single planning unit (which means being managed by a single body or operator), and prevent disposal of individual rooms or flats as independent self-contained homes. We consider that a single management regime is necessary to ensure admission of students from our recognised Higher Education Institutions, provide a safe and healthy environment for student occupiers, and ensure the successful operation of Student and Non-student Management Plans. Student accommodation would not normally comply with the nationally described space standard for self-contained homes, and consequently the disposal of individual units for independent occupation would be inappropriate.

Affordable student accommodation and the alternative option

7.310 The London Plan indicates that "the maximum level" of affordable student accommodation should be incorporated in developments of student housing, and operates the same viability thresholds that apply to self-contained housing. In the London Plan 2021, these are a threshold of 50% for industrial land and most public sector land and a threshold of 35% in other cases. Where the proportion of affordable housing reaches or exceeds the relevant threshold level, there is no requirement to submit a financial viability appraisal in support of the application, but if construction has not adequately progressed after a specified period (usually 2 years after permission is granted), an early stage viability review will be sought to indicate whether there is potential for any additional affordable student accommodation.

7.311 The Council will support proposals that offer affordable student accommodation in accordance with the London Plan provisions, but as an alternative we will strongly encourage contributions of self-contained affordable housing on-site in accordance with the guideline mix set out in Policy H4 Part B. We note that it will only be feasible to provide the Policy H4 guideline mix where the affordable housing can be provided in a separate block and / or be accessed from a separate stair/ lift core, rather than being fully integrated into the purpose-built student accommodation.

Protecting existing student accommodation

7.312 Given the importance of Camden's Universities to the local economy and the provision of a highly trained workforce to support the Knowledge Quarter, alongside the pressure students place on the wider private rented stock, the Council will seek to protect existing student accommodation, including housing managed by education institutions and independent providers, unless it is either:

- incapable of meeting relevant standards for houses in multiple occupation or other contemporary design standards, or fails to meet student expectation as demonstrated by a high incidence of vacant rooms and lack of demand; or
- adequately replaced by new provision which meets the criteria set out in Part B of Policy H9; or
- alternative accommodation is available that better meets the needs of the students it has served.

7.313 Where the loss of student accommodation is justified to the Council's satisfaction, any alternative development should provide an equivalent or greater amount of floorspace in another permanent housing use in accordance with Policy H3 (Protecting existing homes). We will prioritise the delivery of self-contained housing in accordance with the priority land-use set out in Policy H1 (Maximising housing supply), but acknowledge that in some cases the design and layout of student accommodation may more readily lend itself to development for an alternative form of permanent housing with shared facilities.

7.314 In accordance with Policy H1 - Maximising housing supply and Policy H3 - Protecting existing homes, we will resist proposals for non-residential development, and resist the conversion of student accommodation for year-round short-term lets or visitor accommodation (such as backpackers' hostels). Most forms of student accommodation do not fall into a planning use class, so the Council will regard any material change to the use (including a change to the type of occupier) as development.

7.315 When considering development for an alternative form of permanent housing to meet general needs, we will expect the housing proposed to satisfy all relevant Local Plan policies, and to make an appropriate contribution to affordable housing, in accordance with Policy H4. The Council will negotiate the contribution to affordable housing taking into account all relevant criteria in Part E of Policy H4, and any other material considerations.

7.316 We note that until very recently, student accommodation has been developed free from the application of any affordable housing requirements, and also that the stock that is most likely to be decommissioned will often be older accommodation that is amongst the cheapest available to students. Consequently, where smaller developments for an alternative form of housing are proposed (with capacity for 15 or fewer additional homes), the Council will apply Policy H4 treating all the housing floorspace proposed as additional housing floorspace. If replacement student accommodation is provided elsewhere, we will consider the proportion of affordable housing and affordable student accommodation provided across both sites.

7.317 Within Camden there is a modest supply of housing with shared facilities which is available to young people and visitors on a short or longer-term basis, usually run by charities and religious institutions. Such housing can be a valuable resource for students arriving in London for the first time, and in some cases is largely occupied by students. However, where this housing is not managed by an education institution or restricted to occupation by students during term-time, the Council will assess proposals involving its loss on the basis of Policy H10 (Housing with shared facilities) (including large-scale purpose-built shared-living) rather than Policy H9.

Housing with shared facilities (including large-scale purpose-built shared living)

7.318 Policy H10 seeks to ensure that there is continued provision of housing with shared facilities to meet the needs of small households in Camden.

7.319 In Camden, existing housing with shared facilities mostly takes the form of homes let to a group of friends, homes let room-by-room to unrelated individuals, or properties formally divided into bedsits.

7.320 There are also a few instances of other types of housing with shared facilities in the borough where the occupiers are long-term residents and Policy H10 applies (e.g. hostels for migrant workers, accommodation for members of a religious order). There are also types of housing with shared facilities that are subject to other specific Local Plan policies rather than Policy H10 (e.g. student accommodation), as set out in subsequent paragraphs.

7.321 Recent years have seen the development of a new form of rented housing with shared facilities in some parts of London, often known as compact living or co-living. Typically this type of housing comprises 50 or more small flats which contain their own kitchen and bathroom / toilet facilities, but are supplemented by shared facilities such as gyms, other recreation areas, and cafes. In some respects, the format of compact living or co-living can resemble student housing, but the social spaces can be used to market this housing option as a lifestyle choice. Given the presence of shared spaces, these developments do not usually comply with nationally described space standards. The London Plan refers to compact living and co-living as “large-scale purpose-built shared living”. The Local Plan adopts the same term, and regards this form of development as permanent housing provided that the minimum tenancy length is at least three-months.

7.322 Housing with shared facilities is often referred to as houses in multiple occupation (HMOs). House in multiple occupation has a specific meaning under section 254 of the Housing Act 2004. Broadly, a house in multiple occupation is a flat or house that is the main residence for 3 or more occupiers forming 2 or more households and who share a kitchen, bathroom, or toilet. A household is generally a family (or people with relationships equivalent to a family). The Council has adopted an additional licensing scheme for houses in multiple occupation, along with standards for the spaces and facilities they should provide. The types of housing referred to in paragraphs 7.319 and 7.320 are likely to be subject to the Council's HMO standards. Large-scale purpose-built shared living will not be subject to HMO standards in most cases.

7.323 Policy H10 specifically relates to types of housing such as:

- accommodation shared by more than 6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (larger houses in multiple occupation or HMOs and large-scale purpose-built shared living);
- other accommodation with shared facilities where people live long-term (such as hostels for migrant workers), often designated for particular groups, but excluding designated student housing and housing for older people, homeless people and other people with care or support requirements.

7.324 Other policies in this Plan contain specific provisions for some kinds of housing with shared facilities:

- key-worker accommodation such as nurses' homes and hostels is considered in Policies H4 and H5;
- housing for older people, homeless people and other people with care or support requirements is considered in Policy H8;
- student housing (known as purpose-built student accommodation) is considered in Policy H9;
- self-contained houses and flats occupied by a single household are considered primarily in Policies H1, H3, H4, and H7; and
- provisions for hotels and other visitor accommodation (e.g. serviced apartments, apart-hotels and hostels aimed at tourists and backpackers) are considered in Policy IE5.

7.325 The Council will treat houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms or facilities (small houses in multiple occupation or HMOs in Use Class C4) in the same way as self-contained homes (Use Class C3) to reflect the freedom provided in legislation for changes between these two uses without a planning application.

7.326 The preceding paragraphs should not be regarded as providing detailed definitions or accounts of the legal position. Planning use classes are set out in The Town and Country Planning (Use Classes) Order 1987 (as amended). Provisions relating to licensing of some types of housing are set out in the Housing Act 2004 and related secondary legislation.

Policy H10

Housing with shared facilities (including large-scale purpose-built shared living)

A. The Council will aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with modest space requirements.

B. 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;
2. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing;
3. complies with any relevant standards for houses in multiple occupation, any relevant residential design standards, and relevant elements of Local Plan Policy D3 (Design of Housing);
4. contributes to creating a mixed, inclusive and sustainable community;
5. protects residential amenity in accordance with Policy A1;
6. in the case of large-scale purpose-built shared living, complies with the distinctive London Plan provisions for large-scale purpose-built shared living in addition to the preceding provisions of Part B;
7. in the case of large-scale purpose-built shared living, provides a contribution to affordable housing in accordance with Policy H4, particularly Part D; and
8. in the case of other housing with shared facilities such as larger houses in multiple occupation, provides an appropriate contribution to affordable housing in accordance with Policy H4, particularly Parts B, C and E.

C. The Council will resist development that involves the net loss of housing with shared facilities other than large-scale purpose-built shared living (primarily the loss of houses in multiple occupation) or the self-containment of any part of such housing unless:

1. either it can be demonstrated that the accommodation is incapable of meeting any relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities;
2. or adequate replacement housing with shared facilities will be provided that satisfies the criteria in Part B above;
3. or the development converts the existing accommodation to provide self-contained housing (in Use Class C3) including at least one home with 3 bedrooms;
4. or the development relates to existing affordable housing and provides self-contained affordable homes;
5. and in the case of proposals satisfying points 1, 2 or 3, the development creates an equivalent or greater amount of floorspace for permanent self-contained housing (in Use Class C3), complies with the nationally described space standard as far as possible, and makes an appropriate contribution to affordable housing, having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.

Additional housing with shared facilities

7.327 The Council does not anticipate a significant number of proposals for development creating new homes with shared facilities in the form of larger houses in multiple occupation (HMOs). Planning legislation provides freedom for changes in either direction between self-contained homes in Use Class C3 and small houses in multiple occupation in Use Class C4, giving the HMO sector scope to expand and contract in accordance with the relative demand for HMOs and self-contained homes. However, larger HMO proposals may come forward where existing homes are too large or the environment is too poor to attract families, or the owner considers an HMO has the best potential to maximise rental returns.

7.328 As indicated in the introductory paragraphs to Policy H10, a new form of rented housing with shared facilities has recently emerged. This is referred to here and in the London Plan as large-scale purpose-built shared living, but is also known as compact living or co-living. Only two relatively small blocks of large-scale purpose-built shared living have been developed in borough, providing fewer than two-hundred flats in total.

7.329 Despite the limited number of large-scale purpose-built shared living projects developed in the borough, there has however been rapid growth of the private rented sector in the borough over the last 25 years. Consequently, Policy H10 sets out criteria for assessing proposals for development for all types of housing with shared facilities except those covered by more specific Local Plan policies (such as Policy H9 for student accommodation). If the Council receives a significant number of proposals for housing with shared facilities, further details of our approach will be provided in Camden Planning Guidance on housing, and developers will be expected to have due regard to this.

Additional housing with shared facilities and the priority for self-contained homes

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, Camden's Local Housing Needs Assessment indicates that the greatest need for self-contained housing over the Plan period will be from households requiring a 3 bedroom home. Nevertheless, additional housing with shared facilities contributes towards meeting our housing target, addresses a permanent housing need, and can reduce the pressure for unrelated adults to share existing large homes. Balancing these considerations, the Council will seek to minimise the loss of self-contained homes with 3 bedrooms, and expect any development of shared accommodation that involves loss of self-contained homes to create a net positive contribution to meeting our housing target.

7.331 Where we have allocated sites specifically for self-contained housing in the Local Plan, or have granted permission for self-contained housing, we consider this to be a suitable and deliverable use. Given this Plan's priority land-use, the Council will resist proposals for the development of housing with shared facilities on a site allocated for self-contained homes, or a site that has an existing consent for self-contained housing, unless evidence is submitted to demonstrate that there is no reasonable prospect of a viable development for permanent self-contained housing coming forward within the Plan period.

Space standards and quality of accommodation

7.332 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation and hostels. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. The standards generally apply to housing with shared facilities where a kitchen, bathroom or toilet is shared by multiple households. The Council will resist proposals for development of this type that fail to comply with the relevant minimum standards. Large-scale purpose-built shared living will not be subject to HMO standards in most cases, although other design standards may be relevant.

7.333 Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life. All housing with shared facilities should be designed to minimise risk to health and safety, be practical, and support adaptability and accessibility. Proposals should take account of Policy D1 (Achieving Design Excellence), Policy D3 (Design of Housing), and Policy A2 (Safety and Security). Applicants should consider the Secured by Design principles and guides, and should discuss any scheme with Police Designing Out Crime Officers at the pre application stage. The Council may seek incorporation of measures related to safety and security as part of a management plan secured by a planning obligation.

Creating a mixed, inclusive and sustainable community and protection of amenity

7.334 The Council will consider whether proposals could have an impact on the mix, inclusivity, and sustainability of a neighbourhood. In some locations, the introduction of housing with shared facilities may broaden and enhance the housing mix available in the area. In other locations, development for large-scale purpose-built shared living could skew the population towards particular groups or lifestyles, especially where it adds to an existing concentration of other types of housing with shared facilities, notably student accommodation. The Council will therefore assess proposals for housing with shared facilities having regard to the existing housing mix in the area and any local concentrations of broadly comparable accommodation.

7.335 Policy A1 indicates that we will seek to protect the amenity of the existing and future occupiers and the amenity of neighbours. This protection is as important for the occupiers of housing with shared facilities as it is to other residents and their neighbours. Where the scale of a proposal for housing with shared facilities or additions to an existing concentration of broadly comparable development risks harm to the mix and sustainability of the community or otherwise has potential to harm local amenity, the Council will seek a range of mitigating measures such as management plans secured through planning conditions or obligations. The existing modest developments of large-scale purpose-built shared living in the borough are in town centre locations, and are not known to have created any amenity issues. However, where mitigation measures are not considered sufficient to overcome anticipated harm, such as in locations where there is a history of negative impacts from comparable forms of accommodation, we may resist proposals for development of housing with shared facilities.

London Plan requirements and contributions to affordable housing

7.336 The London Plan sets out a number of specific requirements for development of large-scale purpose-built shared living. Some are similar to the general requirements of Local Plan Policy H10, while others are more detailed. London Plan requirements include retaining the development under single management, minimum tenancy lengths of at least three months, and provision of a range of facilities including internal and external communal amenity space, and laundry and drying facilities. The Council will expect developments of this type to meet the London Plan requirements.

7.337 The London Plan 2021 indicates that all proposals for large-scale purpose-built shared living will be subject to financial viability appraisal, and should make a contribution to affordable housing in the form of a payment-in-lieu. Contributions are expected to be equivalent to delivering a proportion of the rooms at a discount of 50% of the market rent. The payments should be equivalent to 50% of rooms at discounted rent for industrial land and most public sector land and equivalent to 35% of rooms at discounted rent in other cases. Where the payment secured at the application stage is equivalent to required proportion of rooms at discounted rent, no late stage viability review is required.

7.338 The Council will support proposals to offer financial contributions to affordable housing from development of large-scale purpose-built shared living in accordance with these London Plan provisions, but as an alternative we will strongly encourage contributions of self-contained affordable housing on-site in accordance with the guideline mix set out in Policy H4 Part B. We note that it will only be feasible to provide the Policy H4 guideline mix where the affordable housing can be provided in a separate block and / or be accessed from a separate stair / lift core, rather than being fully integrated into the accommodation for shared living.

7.339 The Council anticipates that any other proposals for housing with shared facilities coming forward are likely to take the form of larger houses in multiple occupation (HMOs), although we do not expect there to be a significant number of developments. The Council will also seek payments in lieu of affordable housing from housing with shared facilities other than large-scale purpose-built shared living. We have adopted the payments-in-lieu approach because the Council does not generally seek provision of affordable housing in the form of housing with shared facilities.

7.340 The Council will assess the appropriate contribution to affordable housing in accordance with Local Plan Policy H4 (Maximising the supply of affordable housing), particularly Parts B, C and E. We will take account of the additional housing floorspace proposed and its capacity for self-contained homes. Where there is capacity for 15 or fewer additional homes and the sliding scale target for affordable housing applies, the appropriate contribution will relate to additional housing floorspace, and exclude any space created from conversion of existing self-contained homes.

7.341 Payments-in-lieu should be calculated on the basis of the payment rates set out in Camden Planning Guidance, currently £5,000 per sqm (GIA) multiplied by the affordable housing floorspace target. Applicants may also submit their own financial viability appraisals to indicate an appropriate level of payment calculated on the basis of providing the affordable housing floorspace target at a discount of 50% of the market rent. This approach is similar to the London Plan provisions for large-scale purpose-built living. In cases where applicants submit their own financial viability appraisals, the Council will seek funding from the developer for an independent verification of the appraisals.

Protecting existing housing with shared facilities

7.342 There is limited provision of large-scale purpose-built shared living in the borough at present. Consequently, Policy H10 does not include specific provisions to protect existing provision of large-scale purpose-built shared living. Nevertheless, the general provisions of the Local Plan will apply, and we will seek to protect all permanent residential floorspace in developments of large-scale purpose-built shared living in accordance with Policy H3 (Protecting existing housing).

7.343 The Council protects other forms of housing with shared facilities (primarily houses in multiple occupation) because many individuals and couples in Camden would be unable to access or afford any alternative accommodation. Camden's Local Housing Needs Assessment suggests that a significant proportion of the projected household growth in Camden over the Plan period will involve multi-person households, including unrelated adults sharing, students, multi-family households and households of one family and other unrelated adults.

7.344 Developments leading to a loss of housing with shared facilities have tended to involve either self-containing the existing bedsits (putting pressure on internal space by adding facilities for personal use), converting the property into larger flats, or creating a single large dwelling for one household. Self-containing bedsits reduces the amount of accommodation available to single people and couples with the lowest incomes. Self-containment also tends to involve the loss of access to previously shared spaces, such as kitchens, sitting rooms, gardens, laundries and drying areas, and bathrooms containing a bath. However, a self-contained bedsit itself is rarely large enough to contain a full range of facilities, or to provide space to socialise with visitors.

7.345 Converting a home with shared facilities into a single large dwelling or a number of flats larger than the existing bedsits would reduce the amount of accommodation available to small households on low incomes in the borough and would also be likely to reduce the number of people occupying the property. However, we may support conversions that create 3 bedroom self-contained flats to augment the limited supply of family housing within the existing stock, as set out in the further paragraphs of this section.

7.346 The Council is actively working to improve the quality of accommodation in the private rented sector, particularly houses in multiple occupation. Where such properties do not meet current standards, are in serious disrepair, or have a history of vacancy, the Council will assess the form of renovation or development best able to provide residential accommodation of reasonable quality and may accept self-containment in some circumstances. The Council will consider the extent of the works required to meet contemporary standards, their likely impact on any designated heritage assets, the cost of restoring the property to use (having regard to any fixtures and fittings removed from the property by the owner), the potential rental return from the property, and the prospect of investment coming forward to make the property suitable for occupation as housing with shared facilities.

7.347 Proposals to replace existing bedsit accommodation, or other housing with shared facilities, usually involve relocating it into an existing self-contained dwelling, and converting the shared accommodation into one or more larger self-contained homes. Such swaps can help a developer or owner to meet a demand for self-contained accommodation in a particular location, provide bedsits in a property that can more easily meet contemporary standards, and / or maximise the value of properties in their control. The Council will not resist such swaps as long as the replacement bedsits are in an appropriate location, represent equivalent or better accommodation (in terms of the number of bedsits, the floorspace, and the standard of facilities and amenities), and are secured by a planning obligation.

7.348 Camden's Local Housing Needs Assessment indicates that a substantial proportion of the households needing market housing over the Plan period are expected to require 3 bedroom homes. The Needs Assessment also suggests that there are likely to be many households that need three-bedroom homes but are unable to access affordable housing and unable to afford market housing to rent or buy. In addition, the Needs Assessment confirms that new-build housing is generally more expensive than existing housing. Consequently, the Council will aim to augment the limited supply of family housing within the existing stock by supporting development that involves the net loss of housing with shared facilities (primarily houses in multiple occupation) where this involves a conversion providing at least one 3 bedroom home. Any resulting 3 bedroom homes should have access to external amenity space where possible to support families with children.

7.349 There is a small stock of social rented housing in the borough that takes the form of bedsit rooms with communal facilities. Small homes are over-represented in this sector, and bedsits are unpopular with tenants, especially since they will be sharing facilities with people they do not know, and this may include people with care or support requirements or with challenging behaviour. The Council therefore supports development or remodelling of social rented accommodation with shared facilities to create self-contained low-cost rented homes, subject to the self-contained homes meeting appropriate space standards.

7.350 In some cases, properties in Camden have been subdivided into flats that are not self-contained because the layout of entrance halls and staircases made self-containment difficult or costly. Where these properties are not let out as bedsits and only share circulation spaces, they do not form housing with shared facilities, and the Council will not resist proposals to convert them into wholly self-contained flats provided that they are able create homes of a reasonable layout and quality. Where such proposals would result in a loss of homes, they will be considered against Policy H3.

7.351 Where the loss of housing with shared facilities is justified to the Council's satisfaction, any alternative development should provide an equivalent or greater amount of floorspace for permanent self-contained housing in accordance with Policy H1 (Maximising housing supply) and Policy H3 (Protecting existing homes). The Council will resist proposals for non-residential development in accordance with Local Plan Policy H3 (Protecting existing homes), and resist the conversion of housing with shared facilities into short-term lets or visitor accommodation (such as backpackers' hostels).

7.352 We will expect the self-contained housing proposed to satisfy all relevant Local Plan policies, and comply with the nationally described space standard in accordance with Policy D3 (Design of Housing). We will also expect the development to make an appropriate contribution to affordable housing, in accordance with Policy H4. The Council will negotiate the contribution to affordable housing taking into account all relevant criteria in Part E of Policy H4, and any other material considerations.

7.353 We note that most existing housing with shared facilities has been developed free from the application of any affordable housing requirements, and also that much of the stock provides for relatively low-income tenants with few alternative housing options. Consequently, where smaller developments for self-contained housing are proposed (with capacity for 15 or fewer additional homes), the Council will apply Policy H4 treating all the floorspace proposed as additional housing floorspace. If replacement housing with shared facilities is provided elsewhere, we will consider the appropriate proportion of affordable housing having regard to the quantity and form of housing delivered across both sites.

7.354 As an alternative to provision of a contribution to affordable housing in accordance with Policy H4, we may seek to negotiate nominations to a proportion of the new self-contained housing, to be provided at discounted rents for a specified period. We will particularly support this approach where we are working with the developer to return the property to use following a long history of vacancy. Nominations would be of single people or households with an acknowledged housing need, potentially including people accepted by the Council as homeless, people in temporary accommodation and care-experienced young adults.

Accommodation for Travellers

7.355 Policy H11 seeks to protect existing traveller sites and supports the provision of new sites to help meet the accommodation needs of Camden's established traveller community.

7.356 For planning purposes, the government's 'Planning policy for traveller sites' (2024) sets out definitions of travellers, gypsies and travellers, and travelling showpeople. In summary:

- 'Gypsies and travellers' are other persons of nomadic habit of life whatever their race or origin;
- 'Travellers' means 'travelling showpeople' and 'gypsies and travellers';
- 'Travelling showpeople' are members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such);
- in all cases, people are still included if they have ceased to travel temporarily or permanently, for example due to health or education needs.

7.357 The Council has a responsibility through national planning policy to assess and plan for the housing needs of all residents, including the gypsy and traveller community. There is an established community of travellers in Camden that have lived in the borough for over thirty years, and which we recognise have longstanding connections with local social networks and services. The Council currently provides five traveller pitches (four at Carol Street and one at Castlehaven Road). There is also a private site for travelling showpeople at the Vale of Health, which has been in usesince at least the 1950s. Known as the North Fairground site, the yard also hosted a fair on bank holidays until the early 2000s.

7.358 The North Fairground site was owned and operated by a family of Travelling Showpeople until late 2020, when it was sold to an individual with no connection to fairs or showpeople. The number of showpeople living on the site has diminished in recent years, while the number of occupants in unrelated occupations has increased. Provisional findings of the emerging London-wide Gypsy and Traveller Accommodation Needs Assessment do not include any identified need for additional plots for Travelling Showpeople in Camden.

7.359 The Council's approach to meeting the accommodation needs of travellers in Camden is set out in Policy H11.

Policy H11
Accommodation for Travellers

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.

B. We will protect existing lawful sites, plots and pitches for travellers and travelling showpeople. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, pitches and/or plots in suitable locations, or are demonstrably no longer needed.

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 permanent traveller pitches:

1. S20 - York Way Depot and adjacent land at Freight Lane; and
2. C27 - Land adjacent to Constable House, Adelaide Rd.

D. The Councill will require new sites, pitches and/or plots for travellers to:

1. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
2. be capable of connection to energy, water and sewage infrastructure;
3. provide safe access to and from the main road network;
4. support the health and well-being of occupiers;
5. provide an appropriate layout and facilities;
6. provide a good level of residential amenity;
7. be attractive and of the highest design quality; and
8. protect local amenity and the environment.

Assessing need

7.360 The 2017 Camden Local Plan identified a need for 16 additional traveller pitches to 2031, based on an assessment of need completed in 2014.

7.361 The London Plan 2021 indicates that boroughs should update their gypsy and traveller accommodation needs assessments as part of the Local Plan review process. To inform the review of the London Plan, the GLA are carrying out a London-wide Gypsy and Traveller Accommodation Needs Assessment. The provisional findings of the emerging Gypsy and Traveller Accommodation Needs Assessment identify a need for 11 additional pitches in Camden by 2031/32. The overall need for the period covered by the new Local Plan (to 2041) will however be higher, and is estimated to be 19 additional pitches.

Meeting the need

7.362 The governments 'Planning policy for traveller sites' requires Local Planning Authorities to:

- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets; and
- identify a supply of specific, developable sites, or broad locations for growth, for 6 to 10 and, where possible, for years 11 to 15.

7.363 To inform the preparation of the Local Plan the Council commissioned consultants to undertake a Gypsy and Traveller Site Identification Study to identify Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.

7.364 The study identified 18 parcels of land that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council. Further assessment work has ruled out 16 of these parcels of land on the basis that they are either unsuitable or unavailable. The two remaining parcels of land have been allocated in the Local Plan to help meet the accommodation needs of Gypsies and Travellers in Camden. These sites are set out in Part C of Policy H11.

Assessing proposals

7.365 We will aim to ensure that new sites / pitches are both adequate and appropriate to the needs of the traveller community and integrated with adjoining communities. All proposals for sites, plots and pitches for travellers and travelling showpeople, whether allocated in the Local Plan, identified by the Council or proposed independently, should meet the criteria set out in Policy H11 and the requirements of the government's Planning policy for traveller sites. Proposals will also be expected to satisfy all other relevant Local Plan policies, including those relating to the impact of development and the protection of green infrastructure.

08

Responding to the Climate Emergency

08
Chapter

Responding to the climate emergency

8.1 The Climate Change Act 2008 (as amended) sets a legally binding target for the UK to bring all greenhouse gas emissions to net zero by 2050.

8.2 The Council declared a Climate and Ecological Emergency in 2019, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems, and set out its ambition to do everything it can to make Camden net zero by 2030. This means we need to reduce all the carbon dioxide emissions associated with fuel consumption within the boundary of the borough to zero by 2030.

8.3 The Council's Climate Action Plan sets out a number of actions to help achieve this. This will also be supported by the Council's Local Area Energy Planning (LAEP) work which is considering the impact and implications of the following key project areas for Camden:

- fabric efficiency including the retrofitting of existing buildings;
- heat networks;
- heat electrification including heat pumps;
- renewables including solar photovoltaics (PV); and
- electric vehicle charging.

8.4 We Make Camden, the Council's Corporate Strategy, emphasises the need to adapt to meet the climate challenge that faces us, address the causes of the climate emergency and work towards becoming net zero, while ensuring that we are supporting and protecting members of our communities from the impacts of climate change.

8.5 The Local Plan is a key mechanism for addressing the climate and ecological emergency and delivering the actions identified in the Council's Climate Action Plan and We Make Camden. Furthermore, the National Planning Policy Framework (NPPF) requires Local Plans to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes and the risk of overheating and drought from rising temperatures.

8.6 Policy CC1 sets out the Council's overarching strategy for addressing climate change, to ensure that new development is designed to mitigate and adapt to climate change to respond to the climate emergency.

Policy CC1

Responding to the climate emergency

A. The Council will expect development to prioritise the provision of measures to mitigate and adapt to climate change. Development should meet the highest feasible environmental standards during construction and occupation and respond to the climate emergency by:

1. prioritising and enabling the repurposing and re-use of existing buildings over demolition;
2. minimising waste and whole life carbon, and increasing the re-use of resources;
3. supporting the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building;
4. ensuring that new buildings are designed and constructed to be net zero carbon in operation;
5. utilising low carbon technologies and maximising opportunities for renewable energy generation and heat networks;
6. being designed to be resilient to climate change by minimising the risk of overheating, improving water efficiency, and minimising and avoiding the risk of flooding from all sources;
7. protecting and enhancing existing green spaces and water sources, enhancing biodiversity, strengthening nature recovery and providing multi-functional green infrastructure;
8. mitigating and improving poor air quality in the borough; and
9. prioritising sustainable transport.

B. The Council will expect developers to demonstrate how sustainable development principles have been incorporated in the design and proposed implementation of their scheme. For developments creating one or more additional homes or delivering 500 sqm or more of additional or re-provided floorspace a Sustainability Statement will be required.

8.7 This policy sets out the Council's overarching approach to responding to the climate emergency and should be read in conjunction with the other policies in this Chapter, in addition to other relevant policies in the Plan, including but not limited to, Policy D1 (Achieving Design Excellence); D4 (Extensions and Alterations); D5 (Historic Environment); D6 (Basements); IE2 (Offices); SC4 (Open Space); NE1 (The Natural Environment); NE2 (Biodiversity); NE3 (Tree Planting and Protection); NE4 (Water Quality); T1 (Safe, Healthy and Sustainable Transport); T2 (Prioritising Walking, Wheeling, and Cycling); T4 (Shared Transport Infrastructure and Services); T6 (Sustainable Movement of Goods, Services, and Materials); and A3 (Air Quality), which provide more detailed policy and guidance.

8.8 Developers will be expected to provide evidence to the Council to demonstrate that they have considered sustainable development principles from the start of the design process. For schemes involving the addition of one or more homes (from new and existing buildings) and proposals involving 500 sqm or more of additional or re-provided floorspace a Sustainability Statement will be required. This should cover:

- reducing waste and circular economy principles;
- energy efficiency;
- overheating and cooling;
- green infrastructure (for example, inclusion of a green roof, green sustainable drainage features);
- water efficiency; and
- BREEAM assessment (where relevant).

8.9 Further guidance on Sustainability Statements is set out in Camden Planning Guidance and developers will be expected to have due regard to this.

8.10 For all other schemes this evidence should be provided as part of the Design and Access Statement (unless agreed with the Council that it is not relevant for the development proposal). Further information on Design and Access Statements is provided in the supporting text to Policy D1 (Achieving Design Excellence) and in Camden Planning Guidance on Design. Developers will be expected to have due regard to this.

Prioritising the retention of existing buildings

8.11 Retaining, re-purposing, refurbishing and extending existing buildings should always be seen as the starting point when considering development options for a site, as this will usually be the most sustainable option and make an immediate contribution to the Council's objective of being net zero carbon by 2030.

8.12 Policy CC2 seeks to prioritise the retention of existing buildings over demolition, recognising the benefits of re-using materials in terms of:

- limiting the carbon emissions associated with the extraction of raw materials;
- reducing the impact associated with demolition and construction on the local community; and
- speeding up the delivery of new homes and jobs, through reduced construction times.

Policy CC2

Prioritising the retention of existing buildings

A. The Council will expect developers to prioritise the retention and improvement of existing buildings over demolition.

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. development options appraisal, which should use the findings of the condition and feasibility assessment to explore feasible development options for the site. The options appraisal should provide justification as to why the preferred option has been selected and why other options that could retain more of the existing building/s have been discounted.

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;
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;
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.

D. Where less than substantial demolition is proposed, developers will be expected to demonstrate to the Council's satisfaction that the proportion of the building being demolished has been reduced as far as possible, in accordance with the waste hierarchy and circular economy principles set out in Policy CC3 (Circular Economy and Reduction of Waste).

E. Where it is demonstrated to the Council's satisfaction that the demolition of all or part of an existing building is justified, the developer will be required to submit a pre-demolition audit and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).

Condition and feasibility assessment

8.13 Developers considering substantial demolition, where 50% or more of the building's floorspace would be removed, will be expected to undertake a condition and feasibility assessment. This assessment should be carried out at the earliest opportunity to understand the reuse potential of the existing building before progressing a proposal for submission to the Council.

8.14 The condition and feasibility assessment should include:

- a review of how the building is (or has been) used and functions;
- servicing information; and
- a technical building survey.

8.15 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, this would need to be evidenced by a structural engineer's report.
In some instances the Council will require independent verification of the structural engineer's report. The Council will expect any independent review to be paid for by the developer.

Development options appraisal

8.16 Developers will be expected to use the findings of the condition and feasibility assessment to inform the consideration of development options for the site. Developers will be required to demonstrate that the options of retention and retrofit; substantial refurbishment and extension; reclaim and recycle as set out in the GLA's Circular Economy Statement Guidance entitled 'CE design approaches for existing structures' have been fully explored. This will require the submission of appropriate detailed drawings. As part of the consideration of development options, developers should also explore whether the building could be re-used for alternative uses, where it is demonstrated that the established use is no longer suitable and/or viable, and the alternative use is compliant with other Local Plan policies.

8.17 All development options should seek to optimise resource efficiency by: reducing waste; minimising materials required; and using materials with low embodied carbon content. Development options should seek to retain as much of the existing building as possible, reducing the need to use new materials and reduce the loss of embodied carbon in the existing structure.

8.18 The options appraisal should provide justification as to why the preferred option has been selected and other options, which could retain more of the existing building have been discounted.

8.19 As part of the development options appraisal a review of site capacity should be undertaken in accordance with London Plan Policy D3 (Optimising Site Capacity through the Design Led Approach). There may be situations where the current layout and design of a building precludes its optimisation in terms of providing a significant uplift in non-residential floorspace and new homes. London Plan Policy D3 (Optimising site capacity through a design led approach) states "Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth".

8.20 Developers should discuss the findings of the condition and feasibility assessment and the consideration of development options with the Council at the earliest opportunity, using Development Management's pre-application advice service, before progressing a proposal for submission.

8.21 A Whole Life Cycle Carbon assessment will be required if the principle of demolition is accepted in accordance with Policy CC4 (Minimising Carbon Emissions). We acknowledge that developers may use Whole Life Cycle Carbon assessment in considering development options; however, this will not be accepted as a means to justify whether the principle of demolition is acceptable.

8.22 Where the case for demolition has not been justified to the Council's satisfaction, we will ask for an independent assessment of the condition and feasibility assessment and options appraisal to be carried out by a Structural Engineer and/or Sustainability Consultant. This will be used to establish whether the detail provided in the Condition and Feasibility Assessment is sufficient and whether the Options Appraisal has adequately assessed the most appropriate or feasible development options and whether the preferred development option is justified. The Council will expect this independent review to be paid for by the developer.

Best use of the site

8.23 In considering proposals which include substantial demolition the Council will take into account whether the development constitutes the best use of the site, informed by the condition and feasibility assessment and the development options appraisal.

8.24 When assessing whether the proposal constitutes the best use of the site the Council will consider:

- the contribution the proposal makes to the delivery of the Plans overarching vision and objectives set out in Chapter 1;
- design and layout;
- the contribution the proposal makes to overall housing delivery in Camden, and in particular affordable housing delivery;
- public benefit, including but not limited to, the delivery of social and community infrastructure, open space, active travel measures, affordable workspace, a significant uplift in jobs and estate regeneration;
- whether the proposal optimises site capacity; and
- the contribution the proposal makes to the local environment.

8.25 Where substantial demolition is proposed, developers will be expected to demonstrate that the benefits associated with the proposal are substantially greater than those that could be realised through a retention scheme.

Where demolition is accepted

8.26 Development proposals that involve less than substantial or substantial demolition must include a pre-demolition audit to identify all materials within the building and document how they will be managed in line with the waste hierarchy. This should demonstrate that the re-use of materials has been fully explored on site and that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). A post-completion demolition and waste audit will also be requested to ensure the plan for managing materials has been implemented.

8.27 Planning applications for schemes involving substantial demolition will need to include a Whole Life Cycle Carbon emissions assessment in accordance with Policy CC4 (Minimising Carbon Emissions). Planning applications for major development involving substantial demolition will also need to submit a Circular Economy Statement in accordance with Policy CC3 (Circular Economy and Reduction of Waste).

Circular economy and reduction of waste

8.28 As the largest consumer of materials in the economy, and a significant generator of waste, air pollution and carbon emissions, the built environment sector must take the lead in supporting the shift towards a 'circular economy'.

8.29 The London Plan defines a circular economy as one where materials are retained in use at their highest value (original form) for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. London needs to move to a more circular economy in order to save resources, increase the resource efficiency of businesses, and help to reduce carbon emissions.

8.30 The Council worked with the other North London boroughs of Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest to jointly prepare the North London Waste Plan. This was adopted in 2022 and forms part of the development plan for each of the boroughs. The Plan identifies suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to manage waste generated in North London. It sets out policies against which planning applications for waste development will be assessed, alongside other relevant planning policies and guidance, and safeguards existing waste sites, including the Regis Road Reuse and Recycling Centre in Kentish Town.

8.31 Policy CC3 seeks to ensure that development in Camden shifts towards a circular economy approach, which reduces waste and uses resources more efficiently.

Policy CC3

Circular economy and reduction of waste

A. The Council will seek to ensure that developments minimise waste, use resources efficiently, and are designed to facilitate easy maintenance, adaptability of use and deconstruction for future re-use.

B. Development will be expected to:

1. reduce waste through the application of the waste hierarchy (Prevention, Prepare for reuse, Recycling, Other recovery, Disposal);
2. minimise the amount of materials used;
3. use materials with a low embodied carbon content;
4. ensure any dismantled materials are sorted and utilised on-site wherever practicable; and
5. reduce water use during demolition and construction, whilst effectively mitigating air quality impacts.

C. The Council will require applications for new build major development and major development which involves substantial demolition and rebuild to submit a Circular Economy Statement.

D. Where a Circular Economy Statement is required (as set out in (C) above), developers will be encouraged to explore opportunities to use the site, or other local sites, for the temporary storage of reusable materials, during the construction phase to enable other developments in the locality to use those materials.

E. The Council will continue to safeguard Camden's existing waste site at Regis Road in accordance with the North London Waste Plan.

Reducing waste and minimising the use of materials

8.32 Policy CC3 expects developments to reduce waste in accordance with the waste hierarchy. The waste hierarchy ranks waste management options according to what is best for the environment, with preventing waste generation sitting at the top of the waste hierarchy, and disposal at the bottom (see Figure 19).

8.33 The London Plan 2021 sets the following targets for re-use and recycling rates for construction, demolition and excavation waste:

- Construction and demolition - 95% reuse/ recycling/recovery;
- Excavation - 95% beneficial use.

8.34 Furthermore, the North London Waste Plan 2022 notes that "beneficial use could include using excavated material within the development, or in habitat creation, flood defences or landfill restoration" and that "preference should be given to using the materials on-site or within local projects".

8.35 Where a Circular Economy Statement is required (see Part C of Policy CC3), developers will be expected to provide evidence to the Council, to demonstrate compliance with the targets set out at paragraph 8.33 above.

8.36 As part of measures to reduce waste, Policy CC3 also expects developments to reduce water use during the demolition and construction phase. The construction phase of development can use a large amount of water, contributing to water wastage, and while water is an important part of dust suppression and site cleaning, there are measures that can be taken to reduce the amount of water used. Sites should therefore look to eliminate water waste, as much as possible, and improve the efficiency of any processes involving water use. Where a Construction Management Plan is required, this matter can be addressed in the Environment sub-section of the report.

8.37 London Plan Policy SI7 (Reducing Waste and Supporting the Circular Economy) recognises the need for the Mayor, Waste Planning Authorities and the waste industry to work in collaboration to promote a circular economy that improves resource efficiency and innovation to keep and use products and materials in their original form (highest use) for as long as possible. Given that the processes involved in the production of raw materials, and even recycled materials, have a negative environmental impact, developers will be expected to demonstrate to the Council how their proposal has sought to reduce material demand, by using fewer materials and reusing existing materials. For new build major applications, or major applications which involve substantial demolition and rebuild, this information should be provided as part of the Circular Economy Statement (see Part C of Policy CC3).

8.38 The Circular Economy Statement should show how a development is reducing waste in accordance with the waste hierarchy; and set out the proportion of materials and elements to be reused on-site; materials to be reused from other sites; recycled materials being used on the site; and the proportion of new materials to be used on-site (kg per square metre) to evidence how material demand has been reduced on-site.

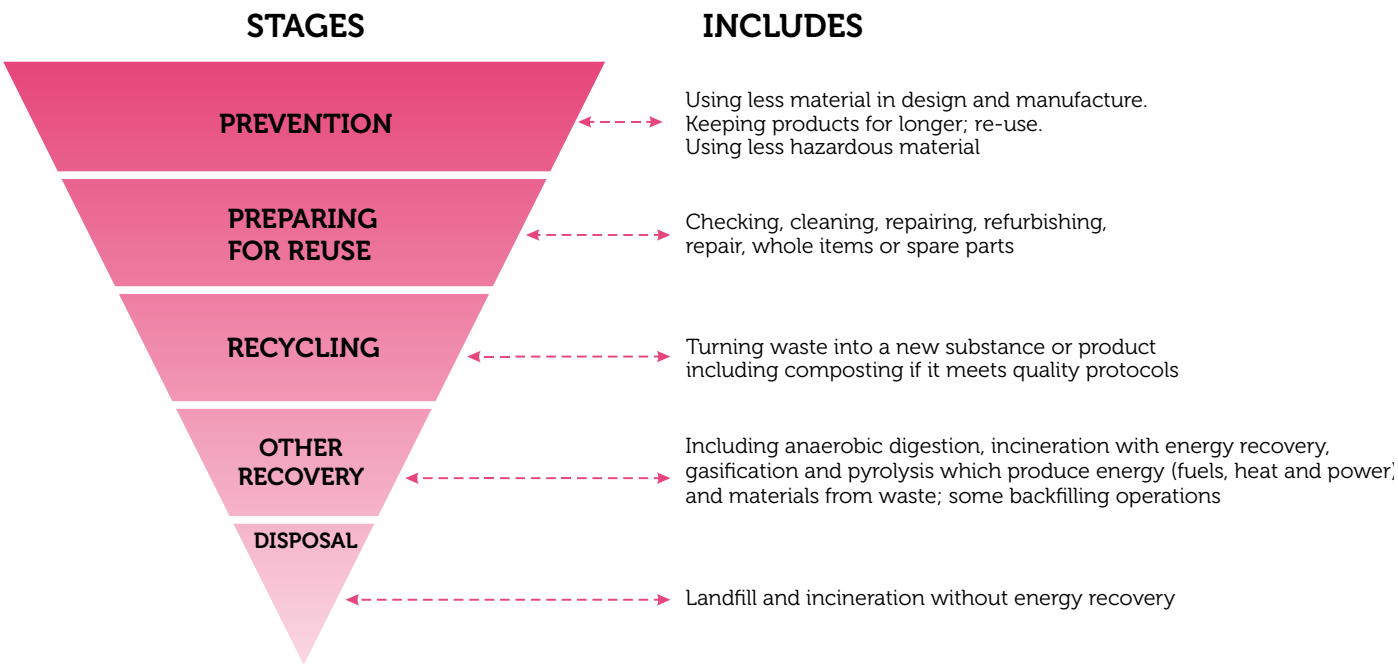
8.39 On smaller developments, which do not trigger the requirement to submit a Circular Economy Statement, developers should set out how Part B of Policy CC3 has been considered. As part of this, developers are encouraged to consider the following:

- dismantling structures in a way that increases the amount of materials that can be reused and salvaged. Any materials should be managed in accordance with the waste hierarchy;
- reusing materials that already exist, either on site or locally (reclaimed brick, tiles, glass); and
- taking time to assess how much material is actually required, rather than over-ordering.

The detail provided should be appropriate to the scale and nature of the proposal.

Figure 19:

Waste Hierarchy, North London Waste Plan 2022



Circular economy

8.40 London Plan Guidance on Circular Economy Statements seeks to ensure circularity is at the heart of the design of development in London, through treating building materials as resources (not waste) and ensuring new development can be easily maintained, adapted, and dismantled over its lifetime. The six Circular Economy principles set out in the GLA's guidance are:

1. building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary;
2. designing out waste - ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials;
3. designing for longevity;
4. designing for adaptability or flexibility;
5. designing for disassembly; and
6. using systems, elements, or materials that can be reused and recycled.

8.41 Taking a circular economy approach to design is about providing a flexible and adaptable scheme where the proposed use is balanced against future possible use requirements, so that the building can be easily reconfigured and maintained as technologies and the needs of the users change. The structure and interior systems should be designed for simple disassembly when parts of the building may need to be altered. Modular designs and standard elements will minimise waste by making their reuse easier.

8.42 The London Plan requires planning applications that are referable to the Mayor to submit a Circular Economy Statement, while stating that lower thresholds for applications are supported. Policy CC3 requires applications for all new build major development and major development involving substantial demolition to include a Circular Economy Statement. The Circular Economy Statement submitted must be prepared in accordance with the London Plan Guidance and include both a written report and the Circular Economy template spreadsheet. The following information is expected to be provided:

- circular economy targets (including post construction information);
- circular economy design approaches;
- circular economy design principles;
- circular economy design principles by building layer;
- pre-redevelopment audit and pre-demolition audit;
- bill of materials (including post construction information);
- end of life strategy;
- operational waste management plan; and
- recycling and waste reporting (including post construction information).

Temporary storage of re-usable materials

8.43 To reduce embodied carbon and increase reclamation, opportunities for temporary material banks on development sites should be explored. Developers can also refer to the London Waste Map for opportunities to manage materials and waste. The Council will encourage the sharing of information via a database which lists all materials held on sites in Camden for reuse.

Regis Road waste site

8.44 Camden currently has one waste site, the recycling and reuse centre at Regis Road, and the Council will continue to safeguard this site for waste use in line with the North London Waste Plan. The change of use or redevelopment of this site will only be permitted if a suitable compensatory waste site is provided that replaces the facilities and services available at Regis Road. The proposed site will be expected to meet the maximum achievable throughput of the Regis Road site (see London Plan Policy SI 9 (Safeguarded Waste Sites).

Minimising carbon emissions

8.45 The built environment is considered to be responsible for around 25% of the UK's consumption-based greenhouse gas emissions.

8.46 Carbon in the built environment is mostly attributable to operational and embodied carbon. Operational carbon is the emissions associated with energy used to operate the building, including heating, hot water, cooling, ventilation, lighting systems, equipment and lifts, while embodied carbon emissions are associated with materials and construction processes throughout the whole lifecycle of a building.

8.47 Embodied carbon can be further broken down into 'upfront', 'in-use' and 'end-of-life' emissions:

- upfront embodied carbon refers to the emissions caused in the materials production and construction phases of the lifecycle before the building or infrastructure begins to be used;
- in-use embodied carbon refers to emissions associated with materials and processes needed to maintain the building or infrastructure during use such as for refurbishments; and
- end-of-life embodied carbon refers to the carbon emissions associated with deconstruction/ demolition, transport from site, waste processing and disposal phases of a building or infrastructure's lifecycle.

8.48 Policy CC4 seeks to ensure that carbon emissions are minimised over the lifespan of a building and that embodied carbon is actively reduced to help respond to the climate emergency.

Policy CC4

Minimising carbon emissions

A. The Council will seek to ensure that development proposals minimise carbon emissions over the lifespan of buildings and actively reduce embodied carbon.

B. The Council will require developers for all new build major development and all development proposing substantial demolition to submit a Whole Life Cycle Carbon (WLC) emissions assessment. This should be submitted as part of the planning application and demonstrate:

1. that carbon emissions over the lifespan of the building meet the GLA's aspirational WLC benchmarks. Where a developer can demonstrate to the Council's satisfaction that this is not feasible, the Council will expect the development to meet GLA WLC standard benchmarks as a minimum; and
2. what action has been taken to reduce upfront embodied carbon in the development.

Whole life cycle carbon emissions assessment

8.49 Whole life cycle carbon emissions assessment considers both embodied carbon and operational carbon.

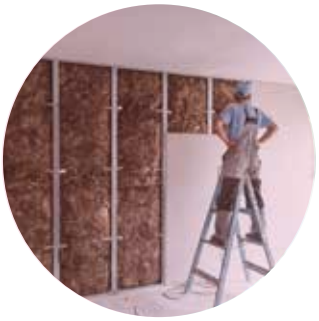
8.50 The GLA guidance on undertaking whole life cycle carbon assessments includes a template to assist applicants. The Council will expect applicants to use the template and follow the most up-to-date guidance issued when undertaking whole life cycle carbon assessments.

8.51 The GLA have produced two sets of WLC benchmarks for most typical development typologies: standard benchmarks and aspirational benchmarks. The benchmarks provide a range rather than a set value and are broken down into life-cycle modules. The first set of benchmarks (standard benchmarks) are designed to be used as a guide by all applicants. The second set are aspirational WLC benchmarks, which are based on a 40% reduction in WLC emissions on the first set of WLC benchmarks. This is based on the World Green Building Council's target to achieve a 40% reduction in WLC emissions by 2030. Further information on the WLC benchmarks can be found in the Mayor of London's London Plan Guidance on Whole Life-Cycle Carbon Assessments and developers will be expected to have due regard to this (or subsequent updates).

8.52 In Camden, whole life cycle carbon assessments will be expected to demonstrate that a development meets the most relevant GLA aspirational WLC benchmarks, which vary according to the use of a building. Where the aspirational WLC benchmarks cannot feasibly be met, a full justification will be required, as part of the Whole Life Cycle Carbon assessment, with the expectation that the development will meet the GLAs standard WLC benchmarks as a minimum.

Embodied carbon

8.53 Applicants will be expected to demonstrate what action they have taken to reduce upfront embodied carbon in the development. Consideration of the design of a building at the early stages of a development proposal can reduce embodied carbon by minimising the quantity of materials used, and the waste created, in construction. Decisions made to reduce embodied carbon, and the level achieved, should be set out in the whole life cycle carbon emissions assessment.



Sustainability improvements to existing buildings (retrofitting)

8.54 The electricity and gas used by buildings for power and heating causes 85% of the direct carbon dioxide emissions in Camden.

8.55 Given this, improving and adapting existing homes and buildings to make them more energy efficient and resilient to climate change (also known as retrofitting) is a key priority for the Council as we strive to achieve net zero carbon. In addition to helping to meet the Council's climate change objectives, improving buildings through measures such as the installation of improved insulation, low carbon heating, solar PV and thermally efficient windows can also help reduce energy costs and lead to significant savings for householders and businesses.

8.56 Policy CC5 seeks to support improvements to existing buildings to make them more energy efficient and resilient to climate change. Many retrofitting measures can be implemented without the need for planning permission. For advice on whether planning permission is required for retrofit works, please contact the Council's Planning Service.

Policy CC5

Sustainability improvements to existing buildings (retrofitting)

A. The Council will support adaptations and improvements to existing buildings to reduce the energy needed to occupy them, generate renewable energy, and address climate risks such as drought, overheating and flooding, where the measures are in accordance with the other policies in this Plan.

B. Where works are proposed to a listed building, whole building retrofit plans are recommended, in accordance with Policy D5 (Historic Environment).

C. To improve the sustainability of existing buildings, we strongly encourage schemes that alter, extend and/or convert existing buildings to incorporate one or more of the following measures, appropriate to the scale or nature of the proposal:

1. installation of improved insulation and ventilation;
2. replacement of poor performing windows and doors;
3. installation of low carbon heating (for example a heat pump) or space for a heat pump to be installed at a later date;
4. installation of solar photovoltaic (PV) panels;
5. installation of external shading to reduce overheating risk;
6. installation of a green roof or green and blue roof; and
7. installation of water efficient, low flow fixtures and fittings, and rainwater harvesting.

D. The Council will require the submission of evidence to demonstrate how energy efficiency improvements have been considered and will be implemented. This should be detailed in a Design and Access Statement or, where required, a Sustainability Statement.

8.57 When undertaking sustainability improvements to existing buildings, the impact of proposed retrofit measures should be carefully considered as a whole, with the building's fabric, ventilation and heating characteristics all designed to work in harmony. Developers are advised to refer to the following guidance for further information:

- Adapting Historic Buildings for Energy and Carbon Efficiency - Historic England;
- LETI Climate Emergency Retrofit Guide;
- Net Zero Carbon Toolkit - Etude et al.

8.58 Whole building retrofit plans are also recommended, particularly for listed buildings, in order to avoid the risk of any unintended consequences or installing incompatible improvements. A whole building approach to energy reduction helps to ensure that retrofit improvements work well together, that the benefits of every retrofit measure are fully understood and that the building is considered as a whole. Where whole building retrofit projects are proposed, these should consider the delivery of fabric measures first to improve energy efficiency.

8.59 The following paragraphs outline a number of measures that can be undertaken either as part of an extension, alteration or conversion, or as part of wider whole building approach to energy reduction. Further information on sustainability improvements can also be found elsewhere in this Plan.

Insulation

8.60 Insulating walls, floors and roof spaces is one of the best ways of reducing energy consumption in homes. Insulation to solid walls can either be installed on the outside walls (external) or on the inside walls (internal).

8.61 External wall insulation in conservation areas can dramatically change the appearance of an area by covering up traditional brickwork and obscuring decorative details in the architecture. Generally external wall insulation is unlikely to be acceptable on the front elevation in a conservation area, however it may be acceptable on side and rear walls where the walls are not predominately visible from the street or wider view, or where they form part of a decorative uniform group. Outside of conservation areas external wall insulation will generally be accepted provided what is proposed is in accordance with the design policies in this Plan.

8.62 All external wall insulation should be applied without the need to extend roof eaves, ensuring original detailing is reinstated, the junction with other elevations is carefully considered, and the finish matches the material, colour and texture of the existing building. The junctions with adjoining properties and around window and door reveals must be sensitively considered, including the repositioning of guttering. Consideration should also be given to the breathability of insulation materials to avoid a build-up of condensation and damp. It is also recommended that a ventilation strategy is considered to ensure that works do not contribute to an increased risk of overheating or excess moisture build-up.

8.63 Other types of insulation, such as floor and roof insulation, are more likely to be acceptable in listed buildings, but this depends on the nature of the floor and whether air can circulate.

Ventilation

8.64 Ventilation is important for homes undergoing retrofit measures because improved insulation and airtightness (through improved windows, for example) can increase issues with moisture build-up and indoor pollution. Ventilation can include simply opening windows or having trickle vents on windows, or installing an extractor fan in bathrooms and kitchens.

8.65 Where homes become more energy efficient through the installation of improved insulation and high performing windows, fitting a ventilation system such as Mechanical Ventilation with Heat Recovery (MVHR) should be considered. MVHR is a whole house system that extracts damp and stale air from a building and draws in fresh air from the outside. A heat exchanger is used to ensure heat is not lost from air flowing inside and outside. Inlets for ventilation systems should however be located away from busy roads or other pollution sources (in accordance with Policy A3 (Air Quality).

Windows and doors

8.66 The Council will support the installation of secondary, double or triple glazed windows, where appropriate. Window replacement should seek to match the features and appearance of original windows or those most closely associated with the historic character of the area.

8.67 Planning permission for window replacement is required where they do not match the material, colour, size and design of existing window frames and profile, or where it relates to a listed building or building covered by an Article 4 Direction (which removes permitted development rights for certain building works). Please see the Council's webpage 'Article 4 Directions Heritage and Conservation' for more information.

8.68 Energy efficient replacement doors can also help to improve the comfort of a home. Similar to window replacement, planning permission is generally not required (unless covered by an Article 4 Direction, or where a building is listed) provided they match or are as similar as possible to the design and material of the original door.

Heat pumps

8.69 Heat pumps operate by absorbing heat from a source such as the ground, water, waste heat from machinery, or the outside air, and using it to provide heating. Heat pumps are most efficient in buildings that are well-insulated and draught proofed.

8.70 To minimise any potential noise impact, external heat pump equipment should be installed away from neighbouring properties. Further guidance is also available in the 'Heat Pumps Professional Advice Note' produced by the Institute of Acoustics and Chartered Institute of Environmental Health.

8.71 Permitted development rights allow certain building works and changes of use to be carried out without a planning application. Planning permission is not always required for air source heat pumps provided that they meet permitted development criteria (see the General Permitted Development Order). Where heat pumps are proposed for listed buildings, listed building consent and planning permission is required. Please refer to Historic England guidance on 'Adapting Historic Buildings for Energy and Carbon Efficiency' for further information.

Solar photovoltaic (PV) panels

8.72 In most cases, roof-mounted solar panels on residential properties do not require planning permission, provided they meet certain conditions, as set out in the General Permitted Development Order.

8.73 Where solar panels are proposed on listed buildings, buildings covered by an Article 4 Direction which removes permitted development rights for the roof, or where what is proposed goes beyond the permitted development conditions, then planning permission and listed building consent will be required. Where solar panels require planning permission and listed building consent these will be supported provided that they do not harm historic fabric or the significance of a heritage asset.

Energy use and the generation of renewable energy

8.74 One of the aims of the Camden Climate Action Plan is to ensure that "Camden's buildings will be energy efficient, comfortable and fit-for-purpose for a zero carbon future".

8.75 All buildings in England and Wales must comply with Part L 2021 of the Building Regulations which sets a minimum level of performance for the conservation of fuel and power. However, in order to deliver climate commitments, local authorities can seek to go further than the Building Regulations and set their own energy targets. Paragraph 161 of the National Planning Policy Framework (NPPF) states the planning system should support the transition to net zero by 2050 and should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions; minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

8.76 To inform the approach to the delivery of net zero development, the Council, along with seventeen other London boroughs, commissioned a study on 'Delivering Net Zero'. Camden has also commissioned a further study on delivering energy reduction measures for existing buildings.

8.77 Policy CC6 seeks to tackle the causes of climate change in the borough by ensuring that developments use less energy and maximise the generation of renewable energy on-site. It sets out the Council's approach for new building construction, which includes proposals containing some existing built fabric (such as a façade, core, basement and foundation); and proposals for existing buildings that include the reprovision or addition of 500m2 or more in floorspace or the creation of one or more homes. It also sets out requirements applicable to both new buildings and existing buildings.

8.78 The policy will ensure that necessary action is taken to reduce carbon dioxide emissions and will help the Council to ensure that Camden has enough decent, safe, warm, and family-friendly housing to support our communities - one of the six ambitions in We Make Camden.

Policy CC6

Energy use and the generation of renewable energy

New build construction

A. The Council will expect all new buildings, and developments where some existing built fabric is retained, to:

1. be fossil fuel free (that is, not connected to the gas grid), be ultra-low energy, use low carbon heat (such as heat pumps), and maximise the generation of renewable energy (through solar PV) on-site;
2. be designed to use as little energy as possible to heat them. Developers 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/m2GIA/yr;
    b. offices, Retail, Higher Education Teaching facilities, GP surgeries - 70 kWh/m2 GIA/year;
    c. student accommodation, care homes, extra care homes - 35 kWh/m2 GIA/year;
    d. hotels - 160 kWh/m2 GIA/year;
    e. light industrial units - 35 kWh/m2 GIA/year; and
    f. schools - 65 kWh/m2 GIA/year.
4. be designed and built to achieve an energy balance of net zero carbon in operation. Developers should ensure that renewable energy generation on site (through solar PV) matches, or is in excess of, the total energy use of the building (Energy Use Intensity). Where it can be demonstrated to the Council's satisfaction that it is not feasible for the amount of energy generated in a year through onsite renewable energy production to match the predicted annual energy demand of the building, a payment in lieu will be sought. The payment in lieu should be related to the scale of the shortfall, subject to viability.

B. The total energy use and renewable energy generation of major developments should be monitored for the first 5 years of occupation in accordance with London Plan Policy SI2 (Minimising Greenhouse Gas Emissions).

Policy CC6

Energy use and the generation of Renewable Energy

Existing buildings

C. The Council will expect proposals for works to an existing building that includes the provision of 500sqm or more of additional or reprovided floorspace, or creates one or more additional home, to:

1. be fossil fuel free and use low carbon heat;
2. maximise the generation of renewable energy (through solar PV) where feasible;
3. take measures to reduce the amount of energy needed to heat the building over a year to meet the following space heating demand targets (unless demonstrated to the Council's satisfaction that it is not feasible):
   a. 105 kWh/m2/year for residential conversions;
   b. 85 kWh/m2/year for homes created by upward extension; and
   c. 60 kWh/m2/year for non-residential development;
4. be designed to use as little total energy as possible, to meet the following Energy Use Intensity targets (unless demonstrated to the Council's satisfaction that it is not feasible):
   a. 70 kWh/m2/year for residential; and
   b. 115 kWh/m2/year for non-residential.

All buildings

D. Non-residential development that provides 500sqm or more of additional or reprovided floorspace will be expected to achieve a minimum of 'Excellent' in BREEAM non-domestic refurbishment.

E. Developments covered by Part A and Part C of this policy will be required to demonstrate that a development will deliver all the expectations of this policy through the submission of an Energy Statement.

Delivering net zero

8.79 A net zero operational building is one where no fossil fuels (such as gas in boilers) are used, all energy use has been minimised, and the renewable energy generated on site matches the building's energy use on an annual basis.

8.80 Developers will be required to submit an Energy Statement to demonstrate that development proposals will not utilise fossil fuels in their operation, and will use low carbon heat sources for heating.

8.81 The low carbon heat source should not, however, be direct electric (from the mains supply), as this has been shown to increase bills significantly, which is contrary to the Council's aim of reducing fuel poverty in Camden. Direct electric is also not compatible with connection to district heating networks (see Policy CC7 (Heat Networks)).

Design to reduce heating demand (space heating demand)

8.82 Space heating demand is the amount of heat energy needed to heat a home or building over a year and is expressed in kWh/m2/year. It is a measure of the thermal efficiency (performance) of the building elements. Various design and specification decisions affect space heating demand, including building form and orientation, insulation, air tightness, windows, doors and the type of ventilation system.

8.83 Where a proposal falls under Part A or Part C of Policy CC6 the Council will require developers to submit an Energy Statement as part of a planning application for their site. This should model and demonstrate how the maximum space heating demand target has been achieved. If the space heating demand target cannot be achieved, it must be demonstrated to the Council's satisfaction that every effort has been made to reach the targets set out in Policy CC6.

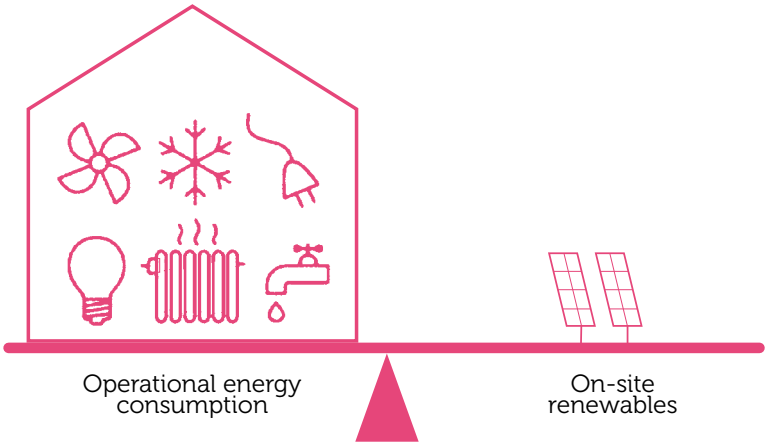
Total energy use (energy use intensity)

8.84 Energy Use Intensity (EUI), or metered energy use, is a measure of the total annual energy consumption of a building over a year, per metre square of floorspace, expressed as kWh/m2/year. The EUI of a building covers all energy uses including heating, domestic hot water, ventilation, lighting, cooking, and appliances (not including renewable energy generation through solar panels). Policy CC6 sets out EUI targets for different building types. It is recognised that not all building types will fit into the categories in the policy. In such cases the developer should, as part of the pre-application process, discuss and agree with the Council what the EUI target for their development should be. Where the EUI target cannot be met, the Energy Statement should demonstrate that every effort has been made to reach it.

Figure 20:

A key component of a net zero operational building is achieving an energy balance.

ENERGY BALANCE
The amount of renewable energy generated in a year should match or exceed the EUI



Renewable energy generation and achieving an energy balance

8.85 All development covered by this policy must maximise the installation of highly efficient solar PV. Where feasible, the installation of a combined green and blue roof and solar PV is expected, in line with policy CC11 (Sustainable Drainage).

8.86 For new buildings, and developments where some existing built fabric is retained, to achieve an energy balance of net zero in operation, renewable energy generation on-site (through solar PV) must match, or be in excess of, the predicted annual energy demand of the building (EUI) (see Figure 20 above). There may be instances, however, where an energy balance cannot be achieved, and the Council will seek a payment in lieu to offset the shortfall. Energy offsetting will only be considered where the developer has demonstrated to the Council's satisfaction, in their Energy Statement, that they have done all that is feasibly possible to achieve an energy balance by minimising the buildings predicted energy usage and maximising renewable energy generation through solar PV. The applicant should establish the shortfall between the predicted annual energy use and annual renewable energy generation. An offset payment equivalent to the shortfall will be secured through a s106 agreement, subject to viability. Funds collected in this way will be used to deliver carbon reduction measures in the borough.

8.87 The offset price will be based upon the cost to install solar PV elsewhere in the borough. Using a reasonable cost rate for a high output solar PV system with micro-inverters (i.e. £1,016/kWp) and applying a 10% additional rate for administering and managing the funding process, gives an energy offset price of £1.32/kWh/year.

8.88 The energy offset contribution should equal the energy difference (kWh) x £1.32/kWh and will be secured by planning obligation. This approach is based on calculations from the 'Delivering Net Zero' study (2023). The offset price may be updated as required to reflect changes to the cost of solar installation.

Works to existing buildings

8.89 Developments involving the creation 500 sqm or more of additional or reprovided floorspace, or one or more homes, will be required to be low energy, use low carbon heat, and generate renewable energy through the use of solar panels where feasible. The Council will expect developers to demonstrate how these measures have been considered and how they will be implemented through the submission of an Energy Statement. Where there are significant constraints to meeting criteria 3 and 4 of Part C of Policy CC6, these should be clearly outlined in the Energy Statement.

Energy statements

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.

8.91 Energy Statements will be expected to include a detailed modelling report, EUI and Space Heating Demand results. Energy performance modelling should be undertaken in accordance with the Chartered Institution of Building Service Engineers (CIBSE) Technical Memorandum 54 Operational Energy (TM54) or its successor. The Energy Statement will also be expected to show compliance with the targets set out in this policy, unless otherwise justified.

8.92 For further information please refer to Camden Planning Guidance on Energy Efficiency and Adaptation and the GLA Energy Assessment Guidance. Developers will be expected to have due regard to these.

Monitoring

8.93 The London Plan requires energy performance reporting to be undertaken for new major developments for at least five years following completion. The GLA's 'Be Seen' guidance states: "All data and supporting evidence should be submitted to the GLA using the 'Be Seen' reporting templates webform". The Council will therefore expect the total energy use and renewable energy generation of major developments to be monitored for the first 5 years of occupation in accordance with London Plan Policy SI2 (Minimising Greenhouse Gas Emissions).

BREEAM Assessment

8.94 BREEAM (Building Research Establishment Environmental Assessment Method) is a tool that enables the environmental sustainability of a development to be assessed. BREEAM contains the following categories: Energy, Water, Materials, Waste, Surface Water, Management, Transport, Land use, Ecology, Health and Wellbeing, and Pollution. Each category contains credits that can be obtained by implementing a sustainable design or construction measure.

8.95 The policy requires non-residential development that provides 500 sqm or more of additional or reprovided floorspace to achieve a minimum of 'Excellent' in BREEAM non-domestic refurbishment. As part of this developers will be expected to achieve 60% of all available Energy and Water credits and 40% of available Materials credits. This weighting of credits is considered to result in the greatest environmental benefits. Where there are significant constraints to meeting this level of accreditation (such as heritage), this will need to be demonstrated as part of the Sustainability Statement submitted with a planning application. More information on BREEAM Assessment can be found in our Camden Planning Guidance on Energy Efficiency and Adaptation and developers will be expected to have due regard to this.

Heat networks

8.96 Heat networks provide heat from a central source. The Council's Local Area Energy Plan has identified communal and district low carbon heat networks as one of the key technologies for the decarbonisation of Camden.

8.97 A low carbon heat network may use waste heat or low carbon heat sources such as heat pumps. A communal heat network is where heating, hot water and, potentially, cooling is supplied to a single building divided into separate premises. A district heat network is the connection of more than one building to a shared system which can span groups of buildings such as flats and offices.

8.98 The majority of Camden is within a Heat Network Priority Area, as defined by the GLA. This means that the heat density in Camden is considered sufficient for heat networks to provide a financially competitive solution for supplying buildings. In addition, DESNZ (Department for Energy Security and Net Zero) Heat Network Zone modelling and the Local Area Energy Plan phase 1 have also indicated that large parts of the borough are Heat Network Focus Areas, where Heat Networks are expected to be the lowest cost low carbon technology, and therefore likely to be designated as a Heat Network Zone through the Energy Act 2023.

8.99 Heat networks and low carbon heat sources will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs. Connections to existing and future planned heat networks are therefore supported in line with Policy CC7.

Policy CC7
Heat Networks

A. Major developments will be expected to utilise energy from heat networks, or be designed and constructed to be able to connect to a heat network, where feasible.

The Council will:

1. expect major development to comply with the London Plan policy on Energy infrastructure and refer to the related GLA Energy Assessment guidance for heat networks and utilising secondary heat sources; and

2. expect major development to prioritise connection to a low carbon heat network.

The heating hierarchy

8.100 London Plan Policy SI3 Energy Infrastructure requires major development proposals within Heat Network Priority Areas (also known as Heat Network Zones) to have a communal low-temperature heating system in accordance with the following heating hierarchy:

1. connect to local existing or planned heat networks;
2. use zero-emission or local secondary heat sources (in conjunction with heat pump, if required);
3. use low-emission combined heat and power (only where there is a case for it to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network);
4. use ultra-low nitrogen oxides (NOx) gas boilers. (Combined heat and power systems (CHP) and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of London Plan Policy SI 1 (Improving air quality).

8.101 The Council will expect major developments (defined as 10 or more homes or the reprovision or addition of 1,000 sqm of non-residential floorspace) to fully explore opportunities to connect to existing or future planned heat networks. Where immediate connection is not feasible, developments should be designed to enable future connection. Developers should refer to London Plan Guidance on Energy Assessments and The London Heat Network Manual for further information.

Connection to existing networks

8.102 London Plan Guidance on Energy Assessments states that where a heat network exists within the vicinity of the proposed development the applicant must prioritise connection, provided that:

- the network does not exceed the CO2 emission and primary energy factor limits set out in Part L 2021; and
- the network operator has agreed a decarbonisation strategy with the GLA and the relevant borough, or is in the process of doing so (unless otherwise updated).

8.103 Existing heat networks in Camden are located in Somers Town, Gower Street, Bloomsbury, Gospel Oak, and King's Cross. These networks have grown around existing CHPs. The carbon savings from these systems has declined in recent times however, as a result of the decarbonisation of the national grid. They are also related to adverse air quality impacts. While it is possible to decarbonise existing CHP systems, this has yet to be carried out in Camden.

Overheating and cooling

8.104 The design of our environment has a significant effect on our experience and perception of heat.

8.105 The UK's climate is changing and in the coming decades periods of high temperature will become more common and more intense. Recent heatwaves have demonstrated how high temperatures are a threat to health and well-being, our infrastructure and economic productivity. Situated in the heart of London, Camden is surrounded by an urbanised landscape characterised by concrete structures, asphalt roads, and limited green spaces. These urban features absorb and retain heat, making cities noticeably warmer than rural areas.

8.106 Given this, it is important to ensure that buildings and spaces in Camden are designed to promote cooling and reduce overheating, while avoiding the use of mechanical cooling, which often has significant energy requirements and, under conventional operation, expels hot air, which adds to the risk of overheating. This will reduce the impact of overheating in the borough and reduce inequality in the experience of heat impacts.

Policy CC8
Overheating and Cooling

A. The Council will ensure that development is designed to minimise overheating and promote cooling. We will:

1. support proposals which seek to adapt and improve existing buildings to improve natural ventilation, address overheating and promote natural (non-mechanical) cooling, where they are in accordance with other policies in this Plan;
2. expect development to minimise the adverse impacts of overheating. Developers should include information in their Design and Access Statement or, where required, Sustainability Statement to demonstrate how the risk of overheating has been minimised and mitigated through the incorporation of design measures;
3. expect major developments to undertake overheating assessments in line with the cooling hierarchy set out in the London Plan, taking into account future climate change. Proposals for active cooling in new residential developments are unlikely to be considered acceptable;
4. only permit applications for new and/or additional active cooling systems or units where all other feasible measures in the cooling hierarchy have been integrated into the development and there is still a clear need for active cooling demonstrated by dynamic thermal modelling. Where applications for active cooling are considered acceptable, the energy used to operate the active cooling system should be offset through the installation of solar PV and greening, to help cool the local environment, where feasible; and
5. seek to minimise the environmental impact of the operation of air conditioning units and heat pumps.

Measures to cool existing buildings

8.107 The most effective way of limiting overheating in a building is to stop heat from entering it or building up inside. This can be achieved through window design or, in the case of existing buildings, the use of appropriate external shading, or internal shutters and blinds, where external shading is not feasible. For south-facing facades, fixed horizontal shading is effective in blocking high-angled summer sun. For east or west facing facades, movable shutters or external blinds that are perforated or slatted are most effective.

8.108 Materials and finishes also have a positive impact in reducing overheating. Generally, lighter coloured materials and finishes reflect more sunlight than darker ones and lead to lower surface temperatures and lower heat absorption. Surfaces covered in plants or water also absorb less heat and maintain lower surface temperatures. Reflective roofs also help to keep buildings cooler.

The cooling hierarchy

8.109 The cooling hierarchy, set out in the London Plan 2021, provides measures that should be used to manage heat risk in developments. The cooling hierarchy is as follows:

1. reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
2. minimise internal heat generation through energy efficient design;
3. manage the heat within the building through exposed internal thermal mass and high ceilings;
4. provide passive ventilation;
5. provide mechanical ventilation; and
6. provide active cooling systems.

8.110 Developers will be expected to minimise the adverse impacts of overheating through the application of the London Plan cooling hierarchy set out above, prioritising the measures at the top of the hierarchy, over the ones at the bottom.

Minimising overheating risk

8.111 Policy CC8 expects developers to demonstrate how the design of a proposal has sought to reduce any adverse impacts of overheating. This could be as simple as noting how the window design in an extension uses smaller windows on the south elevation and larger windows on the north (recognising a balance is needed between solar gain and daylight).

8.112 Applications that create additional homes could also consider using the Good Homes Alliance early stage overheating risk tool, which is considered to be an easy-to-complete and easy-to-understand method of demonstrating how the risk of overheating has been addressed.

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);
- shutters and blinds;
- dual aspect units;
- inset balconies;
- design layouts to promote natural ventilation – secure night ventilation;
- ceiling height at 2.6m;
- using materials and finishes to reflect sunlight;
- ceiling fans;
- hard surfaces (permeable) to be kept to a minimum; and
- maximising green landscaping (see policies in the Natural Environment Chapter).

Minimising overheating in major developments

8.114 The Council will expect developers to demonstrate that measures to cool buildings and the environment between buildings have been explored and integrated within the development.

8.115 The London Plan refers to the Chartered Institution of Building Services Engineers (CIBSE) guidance on assessing and mitigating overheating risk. TM 59 should be used for residential developments and TM 52 should be used for non-residential developments. In addition, TM 49 guidance and datasets should also be used to ensure that all new development is designed for the climate it will experience over its design life.

8.116 Major developments including new build, substantial demolition and refurbishment schemes should demonstrate how the risk of overheating has been addressed and submit evidence as outlined in the GLA Energy Assessment Guidance (or subsequent updates).

Active (mechanical) cooling measures

8.117 The London Plan states that "passive ventilation should be prioritised, taking into account external noise and air quality in determining the most appropriate solution" and that "the increased use of air conditioning systems is not desirable".

8.118 Applicants will therefore be expected to demonstrate that all passive design measures have been thoroughly investigated, in line with the cooling hierarchy, and feasible measures that reduce the need for cooling have been installed, before considering the need for 'active cooling'. Furthermore, the Council will expect applicants to explore the use of mechanical ventilation with heat tempering before air conditioning, in line with the London Plan cooling hierarchy.
The Council will also expect developers to identify, through the energy statement or dynamic thermal modelling submitted with the application, the cooling requirement to be met through active cooling.

8.119 Where the use of 'active cooling' measures are considered acceptable by the Council, we will expect developments to provide an appropriate level of mitigation towards cooling the local environment, where feasible, including the generation of renewable energy through solar photovoltaics, or other measures as recommended.

Water efficiency

8.120 London has lower rainfall than the national average while having a very high population density.

8.121 This combination of limited water resources and high demand has resulted in London being declared an area of serious water stress by the Environment Agency, and this is likely to be exacerbated by climate change.

8.122 This policy seeks to maximise water efficiency in new development to ensure adequate water supply and help respond to the climate emergency.

Policy CC9
Water Efficiency

A. To ensure that water is efficiently conserved and reused, the Council will:

1. require all new development to be designed to be water efficient;
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). Proposals will be strongly encouraged to reduce daily water use even further than this where possible;
3. require all new build non-residential development to achieve 'excellent' for category Wat 01 of BREEAM;
4. require all new buildings to include rainwater harvesting, appropriate to the scale and nature of the proposed development; and
5. require major developments and high, or intense, water use developments, such as hotels, hostels and student housing, to include a grey water system, unless it is demonstrated to the Council's satisfaction that this is not feasible or practical.

Conserving water

8.123 Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rainwater and grey water on-site.

8.124 The simplest way of minimising water use is through installing efficient water fittings and plumbing, such as:

- low and dual flush toilets;
- low flow taps and shower heads;
- low water consuming washing machines and dishwashers;
- using alternative water sources; and
- low water use landscaping and gardens.

8.125 At least 50% of water used in homes and workplaces does not need to be of drinkable quality. For example, rainwater can be water used for flushing toilets, washing laundry and watering plants and gardens. If used outside, a rainwater harvesting system can take the form of a simple water butt. If used within the building it will need to be supplied through pipes and taps that are separate from the standard mains water supply.

Reusing water

8.126 'Grey water' (water that has already been used in hand basins, baths and showers) can be stored, filtered and disinfected, and then reused for toilet flushing, garden watering or laundry. Major developments and high, or intense water use developments, such as hotels and student housing, will therefore be expected to include a grey water system.

8.127 If a grey water system is not included within a scheme, we will expect developers to demonstrate to the Council's satisfaction, that it is not feasible or practical to deliver a grey water system, by providing information on:

- the cost of the system;
- cost savings for owner/occupier;
- projected grey water generation; projected demand for use of grey water;
- water savings as a result of the grey water system; and
- payback for the system.

8.128 When considering water efficiency, developers will be expected to have due regard to the Council's Camden Planning Guidance on Water and Flooding.

Flood risk

8.129 The National Planning Policy Framework requires Local Plans to take account of all sources of flood risk so as to avoid, where possible, flood risk to people and property.

8.130 Camden is classified as being in Flood Zone 1 which signifies the lowest probability of flooding, as there are no main rivers within the borough. All main rivers historically located within Camden are now incorporated into the Thames Water sewer network. These are referred to as 'lost' or historic rivers and include the River Fleet, River Westbourne and River Tyburn.

8.131 Flooding from surface water and sewer surcharge pose the greatest risk to flooding in Camden, and the risk is exacerbated due to the prevalence of the combined sewer system. The borough experienced significant flooding in 1975, 2002, and 2021, and the probability of such events recurring is likely to increase as a result of climate change. Camden also experiences some flooding from groundwater sources particularly in areas to the north and the south of the borough.

8.132 The Council has updated the Strategic Flood Risk Assessment (SFRA) for the borough. This provides a clear picture of the potential risks associated with flooding in Camden and outlines requirements that will ensure that these risks are managed in a sustainable way into the future.

8.133 The location, form, and use of a development, and any flood mitigation measures used, can have an impact on flood risk. The Council is a Lead Local Flood Authority, which means it has responsibility for managing flood risk from surface water and groundwater in the borough. Policy CC10 sets out the Council's approach to managing flood risk, to ensure that development in Camden does not increase flood risk and instead reduces it where possible.

Policy CC10
Flood Risk

A. The Council will seek to ensure that development addresses and reduces flood risk to mitigate the impact of flooding on Camden's communities, both now and in the future. The Council will:

1. expect developers to have due regard to the borough's Strategic Flood Risk Assessment, information published by the Council on previously flooded streets and the Environment Agency's Risk of flooding from surface water map to identify whether a site is at risk of flooding from any source (except for certain smaller developments as set out in the paragraph 8.137 below);
2. require site specific Flood Risk Assessments (FRA) to be submitted for:
    a. all sites of 1 hectare or greater; and
    b. all applications (including basement developments) where flood risk has been identified in accordance with criteria (A1).
3. expect site specific Flood Risk Assessments to:
    a. be prepared in accordance with the guidance set out in the Council's Strategic Flood Risk Assessment;
    b. demonstrate how a development has been designed to be resilient to flooding; and
    c. set out how the risk of flooding will be mitigated over the lifetime of the development, without increasing flood risk elsewhere. Recommendations in the FRA will be secured by planning condition.

B. The Council will also support the retrofitting of flood resilience and flood resistance measures to properties that have previously experienced flooding, or are at risk of flooding, where the measures are in accordance with other policies in this Plan.

Sources of flood risk

8.134 The Council's Strategic Flood Risk Assessment provides information on all sources of flood risk in the borough including:

- surface water flooding – which is based on previously flooded streets, Local Flood Risk Zones, the Environment Agency's Risk of flooding from surface water maps, and historic water courses;
- groundwater flooding;
- sewer flooding; and
- artificial sources of flooding, including flooding from reservoirs and ponds.

8.135 The extent and depth of surface water flooding is also shown on the Environment Agency's flood risk maps (Risk of flooding from surface water), which reflect differing levels of risk. Whilst the data is relatively high level, it predicts the risk of surface water flooding in the urban landscape. The Council also has a record of all known previously flooded streets where surface water and sewer water has affected properties, and this is available to view on the Council's website.

8.136 The Council will expect applicants to refer to the Strategic Flood Risk Assessment when identifying flood risk in relation to a site. Areas at risk of flooding are subject to change (as a result of future flood events) and therefore reference should also be made to Environment Agency surface water maps and any further modelling undertaken (published on the Council's website).

8.137 Applications for the following development types are not however required to identify the flood risk posed to a site:

- minor non-residential extensions (industrial/ commercial/leisure etc);
- extensions with a floorspace of less than 250 sqm;
- alterations or development that does not increase the size of buildings, for example alterations to external appearance;
- minor householder development that would not create a separate dwelling within the curtilage of the existing dwelling (unless related to a basement); and
- changes of use (except where this would introduce a more vulnerable use).

Flood risk assessments

8.138 Where a Flood Risk Assessment is required, the Council will expect this to identify the main flood risks to a development site, assess whether the development will increase flood risk, and set out recommendations for the provision of suitable flood mitigation measures to reduce the impact of flooding at the site and in the surrounding area. The Flood Risk Assessment should consider all sources of flood risk and demonstrate how risk will be managed now and over the lifetime of the development, taking into account climate change and vulnerability of its users.

8.139 A Flood Risk Assessment should be appropriate to the scale, nature and location of the development. Applicants should refer to the Council's Strategic Flood Risk Assessment when undertaking a Flood Risk Assessment to assist in determining the likely impact the development will make to flood risk. It is also recommended that applicants use the Environment Agency guidance on flood risk assessments when considering the scope of the assessment.

8.140 For sites identified as being at risk from flooding, the Council will expect the Flood Risk Assessment to demonstrate that:

- the most vulnerable uses are located in areas at lowest risk of flooding within the site;
- the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- the development incorporates sustainable drainage systems (SuDS), unless there is clear evidence that this would be inappropriate;
- any residual risk can be safely managed; and
- safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

8.141 Where a development is proposed in an area at risk of flooding, the Council will also expect the Sequential Test to be applied in accordance with the National Planning Policy Framework and Planning Practice Guidance on Flooding.

8.142 It is recommended that where a site is identified as being at risk of flooding, applicants seek pre-application advice from the Council at the earliest opportunity.

Basements

8.143 Basements can affect the ability of the ground to absorb rain when soil is replaced by an impervious structure and can be particularly susceptible to flooding. The Council's Strategic Flood Risk Assessment notes that basement development within the north and south of the borough could encounter the water table. The rise and fall of the water table and proximity to historic rivers may increase the risk of groundwater flooding. The approach to basements and flood risk is set out in Policy D6 (Basements).

Flood resilience

8.144 'Property Flood Resilience' is an approach to building design which aims to reduce flood damage, and speed recovery and the reoccupation of a building following a flood. It uses a combination of flood resistance and recovery measures and is described in the CIRIA Property Flood Resilience Code of Practice, which provides advice for both new build and retrofit developments.

8.145 To provide protection from the risk of flooding, the following measures could be implemented in developments:

- non-return valves can be installed to prevent water entering a property from drains and sewers;
- solid timber doors can be used, as these are comparatively more water resistant compared to modern hollow doors. However, it is understood that the flood depth from surface water flooding for lower ground properties may exceed the flood protection level offered by a timber door. In conservation areas, it may be acceptable for a flood-proof composite door to be installed on the lower ground floor, as long as it is of similar appearance and justified due to flood risk; and
- raised thresholds at doors or around lightwells to basements or lower ground floors can also offer a level of protection or resistance against flooding. These should be at least 300mm over ground level or over any known flood height level.

8.146 Additionally, to aid flood recovery the following measures could also be implemented:

- kitchens, bathrooms and essential plant should not be located in basements in flood risk areas to ensure the property remains habitable during any clean up;
- materials with either good drying and cleaning properties or sacrificial materials that can easily be replaced post-flood should be used;
- development should be designed for water to drain away after flooding;
- access to all spaces should be designed to permit drying and cleaning; and
- the level of electrical wiring, appliances, and utility meters should be raised.

Sustainable drainage

8.147 The borough is particularly at risk from surface water flooding, mainly due to its topography and the large extent of impermeable surfaces, which do not allow rainwater to be absorbed into the ground.

8.148 By increasing the number of permeable surfaces into which rainwater can be absorbed, development can reduce stress on the drainage network and reduce the risk of flooding to properties downstream.

8.149 The borough is predominately served by the combined sewer system. This has exceeded capacity in significant rainfall events, which has led to flooding (in 1975, 2002, and 2021). It is therefore necessary for development to reduce pressure on the sewer system by minimising surface water run-off through the application of the London Plan drainage hierarchy, which is set out opposite:

1	rainwater used as a resource stored for future use (rainwater harvesting, blue roofs);
2	rainwater infiltration to ground, at or close to source;
3	rainwater attenuation in green infrastructure features for gradual release (green roofs, rain gardens);
4	rainwater discharge direct to watercourse (unless not appropriate);
5	controlled rainwater discharge to a surface water sewer or drain; and
6	controlled rainwater discharge to a combined sewer.

8.150 Policy CC11 sets out the Council's approach to reducing surface water run-off and promoting sustainable drainage systems (SuDS) to help manage flood risk in Camden.

Policy CC11
Sustainable Drainage

A. All development proposals should follow the London Plan drainage hierarchy to reduce surface water run-off rates as far as practicable. Development proposals should include permeable surfaces, incorporate green and blue roofs, and seek to replace non-permeable surfaces with permeable surfaces where feasible. This should be documented within the Design and Access Statement, or Drainage Report where required.

B. The Council will resist proposals including impermeable surfacing (where rainwater would run-off the surface rather than soak in) unless it can be demonstrated that this is unavoidable.

C. The Council will require all major development to reduce surface water run-off rates to greenfield run-off rates, through the use of Sustainable Drainage Systems (SuDS), following the drainage hierarchy in the London Plan. Sustainable Drainage Systems should:

1. be designed to provide multifunctional benefits, maximise urban greening and be integrated into the development; and
2. meet national and local guidance to ensure they are adequately designed, built and maintained for the lifetime of the development.

D. A drainage report should be submitted with all applications for major development, basements, and other development vulnerable to flooding (as set out in Annex 3 of the National Planning Policy Framework) in areas identified at risk of flooding (in accordance with Policy CC10 (Flood Risk)).

E. In the Counters Creek catchment area (shown on the Planning Policies Map) applications for basement development, and other development vulnerable to flooding in areas identified at risk of flooding, should seek to reduce surface water run-off rates to be as close to the greenfield run-off rate as feasible.

Reducing surface water run-off

8.151 Camden has relatively few permeable surfaces which naturally allow water to soak into the ground. Surface water flooding is caused when the existing water infrastructure (drains and sewers) cannot cope with heavy rainfall. The stress on existing infrastructure can be reduced by increasing the proportion of surfaces which can absorb and store water.

8.152 To support a sustainable approach to drainage, all development (including extensions) should install green or green/blue roofs where feasible and appropriate. A blue roof provides for the storage of rainwater at roof level. Green roof specifications should be tailored to realise the most suitable benefits for the site and should consider appropriate drought-resistant planting to ensure that plants can survive hot summers with minimal maintenance. Increased permeable landscaping and the removal of impermeable surfaces are strongly supported. Further information on these systems can be found in Camden Planning Guidance on Energy Efficiency and Adaptation and developers will be expected to have due regard to this.

8.153 Where the use of impermeable surfaces in a development is unavoidable these should be designed to drain in a sustainable way through the use of SuDS.

Sustainable drainage systems

8.154 Early consideration of Sustainable Drainage Systems (SuDS) in the design and planning of a scheme can lead to the improved integration of measures and the delivery of multi-functional benefits. Where infiltration SuDS are proposed applications will also be expected to refer to Policy NE4 (Water Quality) with regards to the protection of groundwater.

8.155 The Council will require major applications (this includes major applications involving significant works to existing buildings) to utilise SuDS to achieve greenfield run-off rates, unless it is demonstrated to the Council's satisfaction that this is not feasible. (A greenfield run-off rate is one that reflects the natural rate of water run-off from a site before it was developed.) Surface water should be managed as close to its source as possible, in line with the drainage hierarchy set out in the London Plan. Where it is not possible to achieve greenfield run-off rates, run-off rates should be as close to this as possible.

8.156 When determining the type of SuDS to use, developers should consider the importance of local ecological resources, and seek to provide multifunctional benefits such as: enhancing biodiversity, cooling, improving visual amenity, and providing attractive active walking and cycling routes, where possible. A plan for the long term maintenance of SuDS should also be submitted as part of a planning application.

8.157 When taking forward schemes involving SuDS, developers will be expected to have due regard to Camden Planning Guidance on Water and Flooding and Sustainable Drainage Systems: Non-Statutory Technical Standards. Further information on SuDS is also available on Susdrain.

Drainage reports

8.158 A drainage report should be submitted with all applications for major development, basement development, and other flood-vulnerable development (such as homes, health services, residential institutions and education) in areas identified at risk of flooding. The drainage report should include:

- identification of flood risk;
- assessment of existing run-off, and greenfield run-off rates;
- calculation of attenuation volume in m3, in order to achieve greenfield run-off rates;
- identification of measures, in line with the drainage hierarchy, to reduce run-off rates; and
- details of proposed run-off rates.

8.159 When preparing a drainage report, developers will be expected to have due regard to the Council's SuDs advice note and 'Drainage pro-forma' available on the Council's website.

Counters Creek

8.160 The Counters Creek catchment extends across several boroughs north of the River Thames, including the Royal Borough of Kensington & Chelsea, the City of Westminster and the boroughs of Hammersmith and Fulham, Brent, Ealing, and Camden. The catchment comprises an area of approximately 85 km2, of which 18% is within Camden.

8.161 The Camden Strategic Flood Risk Assessment notes there is a greater risk of flooding to people and property in the downstream reaches of the Counters Creek catchment area compared to the upstream catchment, which covers part of Camden (see the Planning Policy Map for the extent of the geographical coverage in Camden).

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 the greenfield run-off rate as feasible.

09

Delivering an Inclusive Economy

09
Chapter

Growing a successful and inclusive economy

9.1 Local Plan policies on the economy aim to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to, and share in, the borough's economic growth.

9.2 Camden has concentrations of high performing growth sectors, a significant research base and is home to a variety of national institutions. Strengths include the numbers of businesses engaged in technology and science; clusters of medical and educational uses; legal services; consultancy; and a wide range of creative industries. The vibrant social mix and creative spirit make the borough an attractive environment in which to invest. Further, multiple public and private organisations have committed to work together to promote and grow the Knowledge Quarter centred on King's Cross and Euston, recognising it has become an internationally significant cluster of knowledge and research-based activity.

9.3 In 2022, Camden had the third highest number of jobs of any local authority area in London, at 402,000, demonstrating the borough's importance to London's economy. The number of jobs in the borough is nearly double the number of residents and around two-thirds of workers commute from outside of Camden. The largest employment types were 'Professional, Scientific and Technical Activities', 'Information and Communication' and 'Human Health and Social Work Activities'. The density of jobs reflects the scale and mix of business, research and cultural activities within the Central Activities Zone and the importance placed by businesses and organisations on proximity.

9.4 While the last decade has seen dramatic changes in how people shop and access services, the borough's centres and high streets are generally performing well with vacancy rates in 2022 having largely returned to pre-pandemic levels. The 2024 Council Retail Survey shows that nearly all centres in the borough have vacancy levels far lower than national averages. There is also a vibrant evening and night-time economy concentrated in the south of the borough and Camden Town.

9.5 Although Camden has a vibrant and resilient economy, with incomes of resident employees being above London and national averages, challenges exist, and the Local Plan's policies seek to respond to these. These include:

- areas of relative disadvantage experiencing income and employment deprivation due to low pay, insecure work and unemployment. This disproportionately impacts younger residents, Black, Asian and Other Ethnic communities, and disabled people, who are under-represented in higher-skilled occupations;

- around a quarter of working people in the borough are experiencing poverty with the cost-of-living crisis having a disproportionate impact on low-income families;
- too many residents lack a financial stake in the economy or are unable to influence decisions despite the growth they see around them;
- demand for large corporate office space and growth sectors such as life sciences, with limited land availability can make it challenging for start-ups, smaller businesses and not-for-profit organisations to find workspace on fair and affordable terms;
- significant numbers of office and industrial buildings will struggle to meet tighter energy efficiency standards without timely intervention; and
- reflective of wider inequalities, some residents experience exclusion from the digital economy.

9.6 Our planning policies seek to ensure a continuing supply of office, industrial and warehousing land and premises to deliver growth and innovation while securing beneficial social, economic and environmental outcomes. The Local Plan seeks to improve access to a greater supply of affordable workspace, recognising its role in developing a more resilient economy based upon a range of business sizes and types, including start-ups and emerging enterprises. Allocated sites suitable for additional workspace are identified in chapters 3, 4, 5 and 6 of the Plan.

9.7 Camden is an attractive place for business investment for multiple reasons, including the borough's transport connections and quality of the public realm. The area Policies (S1, C1, W1 and N1) in chapters 3, 4, 5 and 6 of the Plan, and the Infrastructure Delivery Plan identify the main infrastructure commitments and plans in the borough, many of which will help to support the growth of businesses and social enterprises.

9.8 To ensure that the borough retains a diverse and vibrant economic base, the Council has also brought forward Article 4 Directions in central London, town centres and employment clusters to ensure that the local economy and livelihoods are not harmed through inappropriate changes of use. The Article 4 Directions remove permitted development rights which allow changes of use to be carried out without a planning application or assessment against planning policies, and without providing contributions to affordable housing and necessary infrastructure. The Article 4 Directions also help to stem inflation in business rents from the loss of viable premises.

9.9 Throughout this chapter, the terms 'employment use or space', 'business' and 'workspace' are used to refer to the following uses:

- commercial, business and service uses (Use Class E) - this includes retail, cafes, restaurants, offices, research and development (R&D), light industry, health centres and indoor gyms;
- general industrial uses (Use Class B2);
- storage and distribution (warehousing) (Use Class B8); and
- other unclassified uses of similar nature to those above, such as depots or building merchants (Sui Generis).

Policy IE1

Growing a Successful and Inclusive Economy

A. To secure a strong, diverse, sustainable and inclusive economy in Camden, and maximise opportunities for the borough's residents, businesses and voluntary sector to contribute to and share in the success of Camden's economy, the Council will:

1. use its planning powers to support businesses and enterprises of all types and sizes for a variety of business activities, while prioritising the delivery of space for key growth sectors, research-based activities, start-ups, smaller businesses and social enterprises;
2. maintain a stock of premises available on a range of terms and conditions for firms with differing resources, including provision of affordable workspace;
3. expect larger schemes to provide a range of unit sizes to increase the supply of space available for smaller businesses and entrepreneurs;
4. resist the loss of viable employment space, especially where this offers lower cost or flexible space suitable for use by smaller businesses;
5. support residents seeking work to access jobs, skills, education and training opportunities; and local business start-ups, by maximising benefits from employment developments throughout the life of the scheme, (planning, construction, fit out and occupation);
6. require the submission of employment and training strategies for major schemes, and for office/industrial refurbishment schemes involving over 3,000 sqm of floorspace (gross);
7. ensure that new workspace is well laid out, functions well for its intended users and can adapt to changing working practices;
8. expect landowners and developers to introduce temporary ('meanwhile uses') in appropriate circumstances;
9. work with landowners and developers to bring forward comprehensive mixed-use regeneration proposals that provide for the intensification of under-utilised sites or land to deliver employment uses and other priority uses;
10. seek the provision of premises and sites that meet the specialist requirements of sectors such as research-based activities, creative enterprises and the jewellery industry;
11. seek to address barriers to work and support health and well-being, such as the provision of childcare facilities to support working families;
12. expect developers to provide high-speed, reliable digital connectivity to support occupiers; and
13. seek to secure a financial contribution towards local skills, training and employment initiatives on schemes where it has been demonstrated to the Council's satisfaction that the loss of employment floorspace or land is acceptable.

9.10 Camden has generally been successful in securing new and refurbished workspace, including for new sectors and forms of business activity, for example digital media businesses and life sciences. This is reflected by the overall size of the local economy, the range of sectors and proportion of high growth businesses. However, the relatively high rents and overall costs of setting up and running businesses in the borough is a significant barrier for start-ups, residents wanting to run their own business and not-for-profit organisations. Furthermore, operating costs are expected to remain high.

9.11 The introduction of permitted development rights, aimed at increasing the supply of housing, have resulted in losses of viable workspace in Camden, including studio and workshop spaces for which there is a strong demand from local enterprises and entrepreneurs. This unplanned approach to managing changes of use has disproportionately impacted some areas, such as Kentish Town, resulting in a diminishing supply of suitable premises and low vacancies.

The need for different workspace types and sizes

9.12 There is an insufficient supply of premises in Camden to support the growth of emerging sectors, a very limited supply of sites for specialist uses, such as purpose-built laboratories and research space, and difficulties finding accommodation to support makers, local supply chains and future retrofitting programmes. Common to most occupiers is the need for reasonable floor-to-ceiling heights, good access to daylight and sunlight and provision of on-site amenities including kitchens, showers, disabled toilets and breakout and meeting spaces. In most cases, flexibility is important to allow premises to adapt as business requirements change. The limited availability of land in Camden and competition from other land uses is expected to have a continuing impact on local property markets for the foreseeable future. Policy IE4 (Affordable Workspace) sets out the Plan's approach to increasing the supply of workspace below market rents, including in locations where less large scale development tends to come forward.

9.13 Outside of the planning process, the Council is also actively supporting businesses and social enterprises through the use of its assets and by working with other landowners and increasing access to finance, for example by the establishment of a community wealth fund. Our policies aim to retain viable workspaces, including smaller, flexible spaces where supply is especially limited. We will seek flexible terms of occupancy where this is necessary to support smaller businesses. Where office premises are experiencing long-term vacancy and there is limited prospect of a viable economic use being found, conversion of these buildings provides a way of increasing the borough's housing supply in the most sustainable locations. Policy IE2 (Offices) explains how this process will be managed.

Employment support, training and learning

9.14 The planning system has an established role in obtaining developer contributions which can be invested in employment and training initiatives, secured through a planning obligation (Section 106 agreement). This is intended to support residents into good quality work which offers stability and security. These programmes include preparing young learners with the skills they require for when they start a career. The Council will therefore require employment and training strategies for all major applications and major refurbishment projects.

9.15 Depending on the size of scheme, the Council will seek local employment opportunities during the design, construction/fitting out and subsequent occupation of a development, including the procurement of local goods and services.

9.16 The Council's flagship scheme for helping residents into work, training and education and to start a business is known as 'Good Work Camden'. In addition, the STEAM (Science, Technology, Engineering, Arts and Maths) programme has been established to support young people to access opportunities into the knowledge economy through an innovative approach linking schools and employers. Camden's Inclusive Business Network has been established as a community of best practice to promote and share learning around good work standards, emphasising inclusive and accessible recruitment practices, access to flexible working arrangements and the progression and development of employees.

9.17 We will expect developers and employers to support local efforts to provide better job security and more equitable outcomes for our residents. Camden Planning Guidance on employment sites and business premises provides more detail on our approach to training, skills and education, and developers will be expected to have due regard to this. This includes advice on where London Living Wage requirements apply, for example, for all Camden apprenticeships.

Reducing resource consumption

9.18 Concerns around the environmental impacts arising from demolition and rebuilding emphasise the importance of spaces being well-designed and capable of configuration for different activities and uses. One way of achieving this is through the use of flexible floorplates with careful consideration given to the location of fixed building components such as lifts, service risers, plant and bathrooms. More generally, all development should function well for its users in line with the Local Plan's design policies, with consideration given to making all buildings, especially those visited by members of the public, accessible wherever this is possible in line with Policy SC2 (Access for All).

9.19 Businesses have an important role in tackling the climate crisis as funders and occupiers of development, through the sharing of knowledge, and by working in partnership with others. The Council will therefore expect proposals to embed low impact approaches to the design, operation and servicing of buildings in line with the Local Plan's climate change policies. Employer participation in local climate action will be strongly encouraged. We will prioritise the retention and extension of genuinely redundant offices where this can provide good quality housing in line with Policy IE2 (Offices) and CC2 (Retention of Existing Buildings).

Meanwhile uses

9.20 A key aim of the Plan is to make the best use of the borough's limited supply of land, including the opportunities presented by vacant or under-utilised sites. 'Meanwhile' or temporary uses have a role in bringing properties back into use, improving access to workspace, bringing people and businesses together in new and interesting ways or demonstrating how a centre or high street's offer might positively evolve. There are multiple examples in Camden of where meanwhile uses have been successfully planned and managed as part of longer, phased schemes, to realise benefits for the local community.

9.21 In centres, 'pop up uses' can allow the trialling of new formats showcasing the potential of a space or provide in-person events or experiences linked to brands and product launches. Meanwhile uses may also form part of a set of interventions (including those outside of planning) facilitating changes in a centre's offer. Meanwhile uses should respond to local needs and priorities and can contribute to wider objectives of making centres more welcoming, inclusive and safe by providing free/low-cost spaces for recreation and well-being.

Opportunities to provide new workspace and grow clusters

9.22 The site allocations in the Local Plan identify the main opportunities to intensify existing employment sites to provide a better range of workspaces, including the re-provision of industrial uses. Adopted Neighbourhood Plans and Council-led planning frameworks provide further detail on how different land uses can be incorporated and benefits for the local community maximised. In addition to the delivery of the site allocations, much of the growth in employment floorspace in Camden is expected to arise from the refurbishment and redevelopment of premises in core office locations such as Holborn and Fitzrovia.

9.23 Proposals incorporating employment floorspace should respond to the local economic context. This includes how a site relates to existing clusters of activity, including any other employment uses on-site. Some smaller enterprises and start-ups have a particular need for cost-effective space located within an established cluster. The competitiveness and productivity of research and development uses can rely on being part of an 'ecosystem' where there are opportunities to interface with related-uses, professionals and institutions.

9.24 Where workspaces are being designed for a particular sector or type of occupier, dialogue with existing businesses and organisations operating in the cluster is likely to be necessary to ensure benefits for the cluster and of co-location are maximised.

Access to supporting facilities and services

9.25 The Council will encourage developers to provide supporting facilities, especially where this is linked to barriers in being able to access good work, for example the inclusion of on-site childcare provision. In some cases, providing shared use (i.e. community access) to a business's facilities may have significant benefit in addressing a local need. Access for start-ups and smaller businesses to on-site communal facilities can also reduce their capital costs upfront and help to provide a stimulating working environment for all occupants.

9.26 Access to high quality broadband is essential for the majority of business types. Developers will be expected to ensure that connections are provided to all workspaces within the development site and delivered on a 'plug-and-pay' basis.

9.27 Camden's excellent transport connectivity, the quality of the public realm and access to local amenities, including leisure and entertainment uses, greatly contribute to the borough's attractiveness as a place to work. Local Plan policies on open space, amenity and transport explain how the impacts of new employment and mixed-use schemes on the local area will need to be addressed. Furthermore, we will continue to seek investment in improvements to local infrastructure, for example improvements to local amenity space which can directly benefit workers, in line with Policy DM1 (Delivery and Monitoring).

Offices

9.28 Camden's office stock is large (c.3-5 million sqm of floorspace), varied in nature, and has an important role in supporting strategic functions in central London. For the most part it is occupied, especially high grade office space, and in good condition.

9.29 Positively for office markets operating in Camden, the Camden Economic Needs Assessment (2023) identifies multiple sectors and activities where the office remains an essential part of business operations, including growth sectors such as data, IT and communications. Conventional office space is also required by a variety of creative industries. There is also a strong demand for hybrid spaces involving the provision of 'traditional' office and laboratory/ research space within the same building. For some organisations, the benefits of clustering and proximity to related uses and activities rely on maintaining a physical presence while for those living in shared accommodation, access to workspace away from home can be an essential requirement.

9.30 Throughout 2023-24, leasing activity in central London has increased, driven by demand for best-in-class offices amongst high growth professional services, including media and tech firms. However, it is recognised that there has been a permanent shift towards greater working from home, with employees in some sectors attending the workplace less frequently, and demand for poorly configured lower specification buildings has therefore fallen.

9.31 Vacancy rates for poorer quality offices have not recovered to pre-pandemic levels; at the same time, there are supply constraints for new and fully refurbished offices and flexible spaces able to offer 'top-tier' Energy Performance Certificate/BREEAM ratings. As part of the UK's transition to net zero, there is an onus on landowners to upgrade (even relatively recently built) office buildings to progressively meet tighter energy efficiency requirements. While there is a growing market for these 'retrofit' projects, it is likely that some office buildings cannot be upgraded at a reasonable cost and therefore may struggle to find occupiers because of the priority tenants are now giving to the sustainability credentials of their workspace.

9.32 Policy IE2 seeks to retain office floorspace where it can continue to meet an economic need. It also supports the retention and reuse of redundant office buildings for housing, including student accommodation. The conversion of large office buildings may in some cases provide an opportunity to improve local access to smaller, flexible accommodation for start-ups and small and medium enterprises (SMEs), particularly affordable workspace, in locations where there is a shortage of such space.

Policy IE2
Offices

A. The Council will manage and protect the stock of offices in the borough to ensure that suitable and viable accommodation is retained, and that businesses, residents and social enterprises are able to access workspaces that meet their requirements. This includes ensuring a sufficient supply of hybrid space bringing together office floorspace and research and development uses.

B. When considering proposals for the provision of additional office floorspace the Council will:

1. support proposals involving additional office floorspace and the refurbishment of existing office stock within parts of the Central Activities Zone where there is an established commercial or mixed-use character, and in cases where employment has been specified as an appropriate use in Site Allocation policies, the Euston Area Plan, or another development plan document. In total, it is anticipated that around 400,000sqm of floorspace will be provided for office and research and development uses over the Plan period;
2. support office provision in other centres where this is of a scale commensurate with the size and function of the centre and in line with the Local Plan's area policies (Policies S1, C1, W1 and N1); and
3. expect active uses to be provided at ground floor level where office and mixed-use schemes are located within an established retail frontage.

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 and is based on a realistic rent. The marketing evidence should demonstrate that suitable economic uses have been fully explored and evidenced to the Council's satisfaction, with consideration given to the feasibility and viability of the following:

1. refurbishment and modernisation of the premises to enhance its attractiveness to potential occupiers;
2. discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements; and
3. reconfiguring the premises to meet the demands of growth sectors and smaller businesses, including studios, start-ups and micro businesses.

Where the condition of the premises is cited as a reason for insufficient interest in the property, the Council may request viability evidence to be submitted, to demonstrate that it is not possible for the building to be refurbished.

D. Where the Council is satisfied that a continuing office use of the building is no longer feasible, our preferred alternative use is housing. In cases involving the loss of over 4,000sqm (GIA) of office floorspace, we will seek the retention of a proportion of floorspace as affordable workspace. This will normally be secured at ground floor level.

9.33 The Council's Economic Needs Assessment has used a demand-based approach, considering labour growth, to project the total quantum of office floorspace likely to be required over the Plan period (406,359 sqm). This figure has been adjusted to take account of hybrid working practices and is considered achievable given delivery in recent years and the potential supply of sites. Within the quantum of floorspace projected, around 210,000 sqm is expected to be delivered from major schemes which already have planning permission. The vast majority of this is under construction so there is a high certainty of implementation during the first five years of the Plan period.

9.34 The Council will continue to steer office provision towards the Central Activities Zone and other centres commensurate with their size and function. This will contribute to the vitality of centres and enable the further development of existing clusters of firms. A significant component of this supply will be from the site allocations set out within the Local Plan. Towards the end of the Plan period, development at Euston is expected to deliver significant amounts of employment floorspace, which has the potential to facilitate further growth of the Knowledge Quarter.

9.35 On top of this planned provision, it is reasonable to assume a continuing supply of 'windfall' schemes (that is, additional premises or sites becoming available for development beyond those already identified) to meet changing tenant requirements and the development of clusters. While refurbishment schemes may not always deliver significant additional floorspace, they can be important in enabling occupiers to meet changing business needs.

Requirements relating to the loss of office space

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 agents with knowledge of local property markets. Robust evidence should be submitted in line with the detailed approach set out in Camden Planning Guidance on Employment Sites and Business Premises, including verification of the online marketing undertaken. The Council will also expect applicants to retain full records of any expressions of interest and viewings and inspections undertaken. We will expect this to be thoroughly addressed within the submitted marketing report.

9.37 As stated, significant elements of the office market continue to perform well in Camden and far greater emphasis is being placed on workspace quality and building performance. It is important to guard against the wholesale loss of office floorspace where these issues are capable of being addressed to maintain jobs and facilitate future economic growth. Some neighbourhood plans and the London Plan seek to protect small office capacity in centres. Developers may therefore be asked to provide viability evidence to show that the refurbishment of a building to enable its continuing office use is not possible. This is particularly the case where premises appear to require relatively small-scale interventions such as improved accessibility or renewed fittings (lighting, cabling for broadband etc.).

9.38 Legislation on building energy performance seeks to make the letting of commercial floorspace contingent on the achievement of certain target ratings (through the issue of Energy Performance Certificates). At the time of writing, this excludes all listed buildings and exemptions are allowed where the costs of upgrading buildings cannot be recovered over a certain timeframe. In practice, this reduces the likelihood of assets suddenly becoming stranded. Where there are exceptional challenges to improving the energy efficiency performance of purpose-built offices (for example, due to the construction method or a building's configuration), the Council will consider waiving the marketing exercise. In doing so, we will have regard to any evidence prepared by engineers or cost consultants with the necessary expertise.

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. The ability to deliver residential accommodation will depend on matters including the size of site and depth of floorplates. Housing provided within former offices should comply with other Local Plan policies seeking a range of dwelling sizes and deliver an acceptable standard of amenity for occupants. In schemes involving the loss of significant amounts of office floorspace (in excess of 4,000 sqm), the Council may seek the reprovision of affordable workspace at ground floor level, subject to the impacts on scheme viability and local need.

9.40 In line with Policy IE1 (Growing a Sustainable and Inclusive Economy), where employment floorspace is lost we will also expect a financial contribution towards local skills, training, and employment initiatives to be provided.

Camden's industrial land supply

9.41 Camden has a small but important stock of industrial land (just under 35 hectares). This supports general and light industrial premises as well as other uses such as logistics, utilities and waste management.

9.42 A sizeable proportion of this industrial land is located on, or near to, former railway yards and sidings and was redeveloped over the last decades of the 20th Century to provide light industrial sheds and storage and distribution facilities. This is often arranged at low densities and includes extensive areas of parking and yard space. The Local Plan's site allocations not only acknowledge the opportunity to intensify employment uses at these locations but also the role this land has in helping the borough to meet its housing targets.

9.43 About a quarter of the borough's industrial land supply is designated as an Industry Area on the Local Plan Policies Map. This is equivalent to the Locally Significant Industrial Sites (LSIS) designation used in the London Plan to describe sites with importance for industrial and related functions. Industrial uses will therefore continue to have an important role in this location. The Council's Economic Needs Assessment notes that the majority of industrial land in the borough is non-designated and identifies 17 'clusters' of non-designated sites. Many of these sites are small, and some clusters have lost industrial capacity over the last decade, including from 'permitted development', restricting the Council's ability to assess proposals against our planning policies, including consideration of potential economic impacts.

9.44 Around half of Camden's industrial land supply (about 18 hectares) is occupied by distribution/logistics depots. These have traditionally tended to be land-hungry uses with extensive areas of vehicle parking. The Local Plan's transport policies support a shift towards more sustainable, 'last mile' delivery operations based on consolidation and use of smaller, lower impact vehicles, including cargo bikes. There is likely to be scope to reduce the footprint of distribution/logistics uses and find alternative and complementary uses on some sites, subject to the needs of the Central Activities Zone continuing to be met.

9.45 Within Camden's industrial land there is one waste management site, and one aggregates site, which are protected through other development plan policies and designated on the planning policies map. Furthermore, Local Plan Policy S3 seeks to protect the jewellery-related uses in the Hatton Garden area in the south of the borough as a nationally important centre for jewellery manufacturing and trading.

Policy IE3
Industry

A. The Council will manage and protect the supply of industrial and warehousing land in the borough, recognising its value for a variety of business types, and the opportunity for some sites to be used more efficiently to deliver economic and wider Local Plan objectives.

B. We will resist the loss of industrial and warehousing land, particularly where it has an important local economic role, or provides essential functions or services for the Central Activities Zone, unless it can be demonstrated to the Council's satisfaction that:

1. the site is no longer able to support a similar or alternative industrial use; and
2. a marketing exercise has been undertaken which demonstrates there is no demand for an industrial-related use; and
3. the applicant has explored options for the refurbishment and modernisation of existing premises. The Council will expect viability evidence to be submitted, to demonstrate that it is not possible for the building to be refurbished.

C. The site allocations in the Local Plan identify opportunities to intensify large industrial and warehousing sites in the borough. To fully realise the potential of such developments, applicants must have regard to:

1. the need for these sites to be master planned and developed on a comprehensive basis with priority given to intensifying employment uses;
2. the delivery of significant numbers of jobs for growth sectors, small and medium enterprises, start-ups and businesses supporting the Central Activities Zone and local supply chains;
3. reprovision of a range of premises that takes into account the varied operational requirements of industrial businesses;
4. prioritising the retention of existing businesses as far as possible. The Council may request the applicant to provide a business relocation strategy where it is not feasible to re-provide accommodation for businesses on-site;
5. incorporating premises at a range of rents, including affordable workspace, and a package of employment and training contributions appropriate to the scale of the development;
6. ensuring the successful co-location of uses through innovative design approaches and avoiding non-employment uses compromising the operation of businesses in line with the Agent of Change principle; and
7. the need to complete the employment element of mixed-use schemes at an early stage in the construction programme.

9.46 The Council seeks to maintain a diverse stock of industrial premises suitable for a range of different users and activities. There have been few recent additions to the supply of industrial premises in Camden and vacancy rates are close to zero. A significant number of premises are occupied by uses important for the local economy, including creative and cultural enterprises, with clusters of firms benefitting from the sharing of knowledge, equipment and yard space. Many of these workspaces are in older industrial buildings, and at relatively affordable rents, making them particularly important for supporting local entrepreneurs and start-ups. Part of Camden lies within the 'Central Services Area', as identified in the London Plan, within which are business premises providing essential services for the Central Activities Zone such as sustainable last mile distribution / logistics and 'just in time' servicing. There is limited ability to provide additional capacity for these uses except where this forms part of major schemes involving the intensification and modernisation of sites.

9.47 The Camden Economic Needs Assessment (ENA) identifies the function and role of existing clusters of industrial and warehousing sites, although there are also some smaller sites outside of these clusters which provide suitable accommodation for small enterprises. The ENA also notes the potential role of industrial land in enabling new and emerging activity over the Plan period, such as building retrofit programmes and circular economy uses (such as the reuse or 'upcycling' of materials), and in supporting more local supply chains (reducing the need to transport goods over long distances).

9.48 Given the constrained supply of existing industrial land in the borough; the limited ability to add significantly to this; the potential for sites in industrial use to continue to serve a beneficial economic function; or help facilitate new/emerging activities, reliant on being able to find suitable industrial land, the ENA supports the protection of remaining non-designated industrial land.

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. Given this, other 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 use is low. Applicants will therefore be expected to provide marketing evidence in line with the approach for offices set out for offices in Part C of Policy IE2 and demonstrate through viability evidence why there is no realistic option for retaining an industrial use, 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.

Comprehensive development of industrial sites

9.50 The site allocations in this Plan include underutilised sites the Council considers provide opportunities to intensify employment use as part of a comprehensive planned approach to development while delivering other Local Plan priorities, particularly permanent self-contained housing. Detailed policy requirements for each site are set out in the site allocation policies. To ensure the effective regeneration of key sites, the Council has been convening discussions with landowners as part of a comprehensive planned approach that considers the most effective approach of bringing different land uses together. One of the site allocations, Murphy's Yard, forms part of the designated Industry Area and therefore proposals will be expected to intensify industrial provision to increase, or at least maintain, industrial, storage and warehousing capacity, and provide for other high density employment uses in line with Policy C3 (Murphy Site).

9.51 Policy IE3 recognises the need for a range of premises to be provided at a variety of rents, reflecting the different ways industrial premises are used. The Council will support the provision of space for emerging and growth sectors, such as the creative industries, recognising their need for a range of accommodation types. Where appropriate, the Council will support new approaches to the co-location of housing alongside employment uses, subject to the Agent of Change principle whereby it is the developer's responsibility to ensure that impacts on the continuing operation of businesses are mitigated. Where existing occupiers would be impacted by development proposals, support should be provided to mitigate the potential disruption to their operations and, if appropriate, a business relocation strategy agreed in line with the approach set out in the London Plan.

Affordable workspace

9.52 Increasing the supply of affordable workspace is a borough-wide priority given land values in Camden and constraints on the supply of suitable accommodation for enterprises and residents to set up and grow businesses.

9.53 Affordable workspace has a vital role in spreading economic opportunity more widely, ensuring that Camden residents can benefit from the growth they see around them.

9.54 There is a need to ensure the provision of affordable workspace where it is lacking, and ensure a sufficient range of workspace types are provided for use by different sectors/business uses, including suitable and relevant spaces to support local entrepreneurship and deliver social impact. Furthermore, increasing provision of affordable workspace would give more residents the ability to access a range of amenities and opportunities, including jobs, within walking or cycling distance from home.

9.55 Many affordable workspaces in London are provided as desk-based co-working facilities, for which there is a continuing demand. Early exemplars of affordable workspace provision have also demonstrated the important role of facilities such as meeting rooms, collaboration areas, kitchens and leisure uses in ensuring affordable workspace is successful and able to meet the needs of a range of occupiers. In some cases, affordable workspace has been provided in tandem with wider community, arts and cultural uses.

9.56 There is also a lack of some types of specialist space; for example: wet labs (handling various types of chemicals and liquids); move-on spaces for life sciences and university 'spin-outs' enabling companies and innovators to grow their operations; studio, workshop and maker spaces; and business accelerators. These are needed to support the development of existing clusters of activity, enable cross-disciplinary research, and to maximise opportunities from the presence of 'anchor institutions' (major organisations with significant assets, hiring and spending power).

9.57 The London Plan 2021 states out that boroughs should include affordable workspace policies within their Local Plans subject to consideration of local needs and viability. It defines affordable workspace as that secured at "rents maintained below the market rate for… space for a specific social, cultural or economic development purpose".

Policy IE4
Affordable Workspace

A. The Council will require schemes to contribute towards a mixed and diverse economy that allows a variety of business types and sizes to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:

1. require all major schemes providing at least 1,000sqm GIA of offices, research and development uses or light industry (use classes E(g)(i), E(g)(ii), E(g)(iii)) to contribute to the delivery of affordable workspace;
2. 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; and
3. apply the following hierarchy when securing affordable workspace:
    a. on-site provision of affordable workspace that meets locally identified requirements in terms of type and specification (configuration, fit out, etc.) and addresses the demands of priority sectors and small and medium enterprises;
    b. off-site provision of affordable workspace on another site in the borough that meets the requirements in A.3.a above. There should be a clear link between the off-site location and priorities for affordable workspace provision identified in the Council's Affordable Workspace Strategy;
    c. a payment in lieu of provision that can be invested by the Council, which is equivalent to the cost of on-site delivery, in line with the payment in lieu calculator below. This will be used by the Council to fund affordable workspace elsewhere in the borough.

B. The Council recognises that different types of affordable workspace are needed depending on location and that the costs of delivery will vary. To ensure the opportunities arising from affordable workspace are optimised, the Council will support a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. Any provision must be consistent with the definition of affordable workspace set out in the London Plan.

C. Where affordable workspace is provided, the Council will expect the applicant to submit an operating plan, setting out what model of affordable workspace is to be provided, sectors/occupiers to be targeted and details of how the space will be managed.

D. The Council will expect the affordable workspace element of a mixed-use scheme to be made available for occupation at the same time as any employment floorspace at market rents.

9.58 The Council adopted an Affordable Workspace Strategy in 2023. It sets out how the supply of affordable workspace can be increased, and the types of spaces needed. Its key aims are: to support Camden residents, start-ups, small businesses and social enterprises to access the space they need locally; enable entrepreneurs to start and grow businesses; address the needs of SMEs, the Voluntary and Community Sector (VCS) and local social enterprises; and support and retain key growth sectors and clusters where opportunities are provided for Camden residents. The Council is also bringing forward employment opportunities through development schemes, for example, sites in its Community Investment Programme.

9.59 Policy IE4 sets out the need for larger employment schemes to contribute towards the delivery of affordable workspace. Spaces need to be well-designed to ensure they meet the needs of their intended occupiers and provide usable, stimulating environments in which to work. Priority will be given to firms and residents with a Camden connection. Policy IE6 (Supporting Designated Centres and Essential Services) also sets out that on schemes providing a significant amount of additional retail floorspace (2,500 sqm or more), the Council will seek provision of affordable retail space. In such cases, this will be secured in line with the approach set out in Policy IE4 above.

How affordable workspace will be delivered

9.60 The quantum of affordable workspace sought will be based on the net additional amount of employment floorspace in the proposed scheme (that is, in floorspace in use classes E(g)(i), E(g(ii), and E(g)(iii)). It will also apply to sui generis uses of a similar nature or character. The Council's preference will be for the affordable workspace to be delivered on-site to meet the needs of Camden enterprises and residents. Basement and windowless spaces will generally be resisted unless this can be demonstrated to meet the needs of a particular sector or operator. Off-site provision may also be accepted where there is a clear link with local workspace priorities and the Council is satisfied that a greater economic impact would be achieved. This may be particularly relevant to applications involving Camden landowners with multiple sites in the borough. The Council will require the preparation of an operating plan, which should be drawn up in conjunction with our Inclusive Economy team.

9.61 The Council may also accept a financial payment in lieu of provision where evidence is provided demonstrating to its satisfaction why direct delivery of the workspace is not feasible. This may include the provision of evidence relating to viability. We may also waive the requirement for on-site delivery where there is already sufficient affordable workspace to meet local demands, having regard to supply and planning permissions in the area, or where the Council itself considers that a better employment outcome would arise from a payment in lieu; for example, where plans exist to deliver affordable workspace in a local estate or high street. We will also seek a payment in lieu of provision where the affordable workspace provided would be less than 300sqm (except in Hatton Garden),as it can be difficult to find occupiers for very small spaces. Occasionally, a blend of direct provision and a payment-in-lieu may present the most suitable approach. In such circumstances, the overall affordable workspace contribution would still be subject to viability.

9.62 A payment in lieu should be calculated following the steps below.

A	Calculate the equivalent market rate for the affordable workspace expected by the policy, then
B	Calculate the income multiplier for the market investment yield = 1 divided by the market investment yield
C	Work out capital value of the affordable workspace at full market value = market rent (A) multiplied by income multiplier (B)
D	Calculate the income multiplier for the affordable workspace yield = 1 divided by the affordable workspace yield
E	Work out capital value of the affordable workspace using the affordable workspace yield = discounted market rent (0.5* of A) multiplied by income multiplier (D)
F	The cost of delivering affordable workspace = C minus E
*	or an alternative discount as otherwise agreed with the Council

9.63 The funds secured through payments in lieu will be invested in projects supported or led by the Council to deliver affordable workspace in other parts of the borough. The Affordable Workspace Strategy identifies such opportunities. Financial contributions for affordable workspace may be used to fund a variety of types/typologies of accommodation including specialist spaces and affordable industrial or retail space in line with objectives set out in the Council's Affordable Workspace Strategy. The Council may agree to the ringfencing of contributions where this would support growth sectors, particularly the need for specialist workspace.

9.64 Specialist spaces mentioned above will by their nature have additional requirements (bespoke to a particular activity or occupier) such as equipment, access to support networks, sterilisation, containment (of gases, liquids) and a range of ancillary services. Consideration of these wider matters, as well as a headline rent, may be necessary to ensure the uptake and successful operation of new workspace. Short leases can also be an essential requirement. Therefore, where development involves the provision of major science and research-based uses, we will take these wider factors into consideration when negotiating the quantum and terms of the affordable workspace to be provided. There is also very high demand for incubator, accelerator and move-on space in Camden associated with the scaling up of activity within the Knowledge Quarter. The Council may therefore use affordable workspace contributions to secure fully equipped workspace or memberships off-site, where this would achieve significant economic impact and benefits for Camden residents.

Consideration of the level of provision and discount

9.65 Policy IE4 takes a flexible approach recognising that access to affordable workspace varies depending on location and that opportunities will vary across different geographies, as well as between sites, depending on factors such as proximity to clusters of businesses, including existing start-ups. The Council will negotiate with developers on a case-by-case basis having regard to all relevant circumstances, including scheme viability. For example, we might accept less than 20% of the space as affordable workspace if it is offered at a peppercorn rent, which is significantly less than 50% of market rents, or where schemes involve an exceptionally large amount of additional floorspace. We also acknowledge that some types of specialist space with bespoke fit-out requirements may not be able to achieve the working benchmark set by the policy. Where affordable workspace is provided which is deemed to meet the Council's requirements, but falls below the 20% threshold, payments will not be required to 'bridge' the difference. Where a scheme is also required to deliver housing under Local Plan Policy H2 (Maximising the Supply of Housing from Mixed Use Schemes), priority will be given to maximising the delivery of permanent self-contained homes, and in particular the provision of affordable housing.

9.66 Integration between the affordable workspace elements and other employment uses on-site will often have a bearing on the success of the space, creating opportunities for potential collaboration and the sharing of communal spaces and services. The nature of the intended/target occupier is also likely to be relevant to the specification of the affordable workspace and length of discount period required.

9.67 Part B of Policy IE4 refers to the need to ensure that the specification of the affordable workspace meets the needs of target occupiers. In Camden, this will generally mean the need to provide fully-fitted space, to ensure the proposed workspace can be used in an affordable way or meet specialist needs, although accommodation provided as 'shell and core' may be an acceptable offer in some instances, for example for an artist studio. Furthermore, business rates, utilities and service charges may also be material to understanding affordability for different users.

9.68 Schemes providing affordable workspace should also be delivered taking account of Camden Planning Guidance on employment sites and business premises, which sets out more detail on how affordable workspace will be secured.

Hotels and visitor accommodation

9.69 Hotels and visitor accommodation can make an important contribution to the local economy, providing wider benefits for local businesses and visitor attractions.

9.70 Visitor accommodation includes bed and breakfast premises, youth hostels, backpacker accommodation, aparthotels, serviced apartments and most other forms of short-stay accommodation intended for occupation for periods of less than 90 days.

9.71 The Council will steer additional provision of hotels and visitor accommodation to areas of the Central Activities Zone where there are already concentrations of these uses, and to sites within identified town centres, recognising that hotels and visitor accommodation can contribute to the vitality of centres.

Policy IE5
Hotels and Visitor Accommodation

A. The Council recognises the importance of the visitor economy in Camden and will therefore protect existing hotels and visitor accommodation and support proposals for additional hotels and visitor accommodation, where these are appropriately sited, and the impact of the proposal on local residents and the surrounding area are appropriately mitigated.

B. When considering proposals for additional hotels and visitor accommodation the Council will:

1. require new, large-scale hotels and visitor accommodation of 2,500sqm or more additional hotel floorspace (GIA) to be located in the Central Activities Zone, with preference given to locations with an established tourism character or concentration of existing hotels and visitor accommodation;
2. support smaller and medium-sized hotels and visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road / Swiss Cottage and in locations with an established commercial or mixed-use character in the Central Activities Zone;
3. apply the sequential test where additional hotel accommodation is proposed outside of a town centre; and
4. expect all hotels and visitor accommodation in Camden to:
    a. be easily accessible by public transport;
    b. not lead to the loss of permanent residential accommodation or housing secured through an unimplemented planning permission;
    c. not prejudice the delivery of new homes on sites allocated for development in the Local Plan; and
    d. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems.

C. The loss of hotels and visitor accommodation in the borough will only be considered acceptable where it can be demonstrated to the Council's satisfaction that:

1. a marketing exercise has been undertaken, which demonstrates that the hotel or visitor accommodation is no longer fit for purpose; and
2. the upgrading or refurbishment of the premises is not a viable option; or
3. the premises is located away from commercial or highly accessible areas.

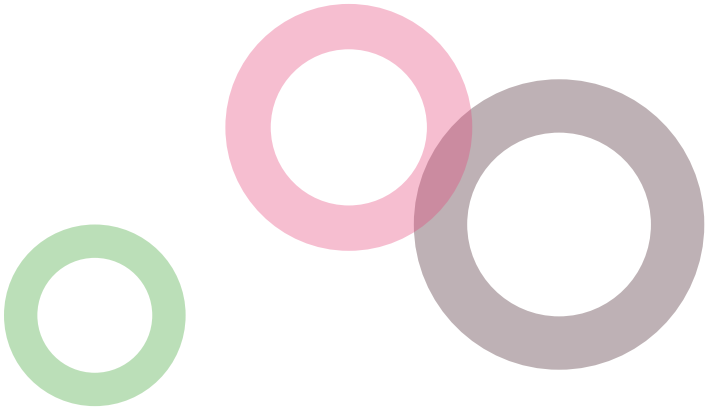
D. Where the Council is satisfied that a premises is no longer suitable for continued use as a hotel or visitor accommodation the Council's preferred alternative use is housing.

9.72 The London Plan states that a sufficient supply and range of "serviced accommodation" should be maintained and considers this to be an appropriate use within the Central Activities Zone except in wholly residential streets or predominantly residential neighbourhoods. By serviced accommodation, the London Plan is referring to hotels, bed and breakfasts and hostels providing catering and cleaning for residents; we consider this to be equivalent to the terminology 'hotels and visitor accommodation' used in this policy. Suitable sites for these uses are likely to be where there is an existing concentration of hotels and visitor accommodation.

9.73 Policy IE5 supports proposals for additional hotels and visitor accommodation, where these that are appropriately sited, and where the impacts of the proposal on local residents and the surrounding area are appropriately mitigated. Due to the potential impacts arising from significant numbers of people arriving and leaving visitor premises, the policy expects larger hotels and visitor accommodation to come forward on suitable sites within the Central Activities Zone. The policy defines larger hotels and visitor accommodation as being 2,500sqm or more GIA, which is considered to be broadly equivalent to 100 additional hotel rooms. Smaller hotels and visitor accommodation are considered to be appropriate uses in identified town centres and areas with an established commercial/mixed use character in the Central Activities Zone. When considering proposals for additional hotels and visitor accommodation we will also apply the requirements set out in the London Plan, which seek to secure a proportion of rooms suitable for people using wheelchairs and other people who would benefit from accessibility measures.

9.74 The National Planning Policy Framework identifies hotels as a main town centre use and states that Councils should apply a sequential test where a proposed hotel would not be situated in an existing centre. We will therefore apply this approach for all schemes involving hotels and visitor accommodation outside of the CAZ, giving preference to edge-of-centres sites and only if suitable sites are not available, will any out of centre locations be considered.

9.75 While the Council welcomes continuing investment in hotels and visitor accommodation, it is vital that this does not undermine the need to provide a sufficient supply of housing. We will therefore resist proposals for hotels or visitor accommodation on sites currently used for housing, where there is an unimplemented planning permission for housing or where this would prejudice the delivery of new homes on sites allocated for development in the Local Plan. New hotels and visitor accommodation will therefore only be supported in the locations set out in Part B of Policy IE5 above.



9.76 The Council is concerned about the rise in short-term lets resulting in the loss of permanent homes, including where entire buildings are being used as blocks of short-term let accommodation. The Council will continue to take enforcement action where properties are found to be in breach of planning regulations and seek further controls from government to enable the proliferation of this accommodation to be more effectively managed.

9.77 We also acknowledge there is a growing market for hybrid uses, for example combining a range of business and commercial uses with hotels or visitor accommodation in the same building. Such proposals will be considered on their merits subject to the applicant being able to demonstrate significant employment benefits (compared against conventional office use) and that any impacts on existing clusters of office uses can be mitigated.

9.78 More generally, additional hotels and visitor accommodation should be capable of being successfully integrated alongside other land uses and not result in unacceptable impacts on the local area or the community in line with Local Plan policies on amenity.

9.79 Furthermore, proposals for large-scale hotels and visitor accommodation will be expected to contribute to employment and training initiatives in the borough, in accordance with Policy IE1 (Delivering a Successful and Inclusive Economy).

9.80 Where a proposed scheme would result in the loss of an existing hotel or visitor accommodation, the Council will request marketing and viability evidence to be provided in accordance with Part C of Policy IE5 above, unless the hotel is located away from commercial/mixed use areas in the Central Activities Zone or outside of a town centre. Where the Council is satisfied that a premises is no longer suitable for continued use as a hotel or visitor accommodation the Council's preferred alternative use is housing.

Supporting designated centres and essential services

9.81 Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole.

9.82 They are places of employment, shopping, leisure, and services and can be important for social, community and cultural exchange by providing places where people can meet and interact. Beyond centres, there are also shopping and food and drink facilities within major railway stations and small standalone shops that provide an essential role.

9.83 Traditional retail-based centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out-of-centre retail development. Town and neighbourhood centres are under pressure from a range of issues, including the impact of the cost-of-living crisis and hybrid working on 'footfall' (the number of people using a centre). This highlights the importance of allowing high streets to diversify and adapt over time, in terms of managing land uses, whilst ensuring that the vitality, character and role of individual centres is not put at risk. It is also acknowledged that some smaller centres in Camden are limited in terms of their offer/mix but nevertheless meet local needs.

9.84 The Camden Future High Streets prospectus was published to help inspire and guide change as high streets adapt to a range of challenges. It envisages high streets that are centres of creativity and innovation, providing goods, services and employment which provide material benefit for the local community and offer environments that are sustainable and accessible for all. The pandemic has strengthened recognition of centres being local hubs providing places to meet, socialise and helping to build a sense of community and opportunity for everyone. Public engagement carried out to inform the development of Council strategies, such as the Evening and Night Time Economy, has found that some residents feel they are not able to enjoy their neighbourhood because of a lack of free or affordable places to meet up or visit.

9.85 The Council's evidence, including retail survey data, shows that most of our centres have low vacancy levels against London and national comparators and the majority have footfall at, or above, the pre-pandemic situation. Centres that have traditionally relied on footfall from workers are experiencing the greatest need to adapt, while centres focussed on local catchments or in proximity to key attractions tend to be performing well. The resilience of particularly larger centres is likely to benefit from having a wider range of uses and activities, including the provision of affordable workspace and temporary or meanwhile uses. Having a more diverse and flexible mix of uses, services and amenities will help to generate visits, footfall and spend. The upper floors of retail frontages will also have a role in providing additional permanent self-contained homes (the Local Plan's priority use).

9.86 The Local Plan focuses on sustaining and enhancing centres, having regard to their distinctive roles, character and accessibility, while allowing beneficial change that meets local needs and priorities, including supporting the visitor / destination role of the West End and existing retail clusters in the Central Activities Zone (CAZ). The Council is taking an integrated approach to supporting town centres, working across services and with partners to achieve a range of social, economic and environmental benefits. Given this, the Local Plan seeks to resist the further proliferation of some uses where evidence shows they could harm the health and well-being of residents.

9.87 Both designated town centres and the CAZ are suitable for accommodating new retail, leisure, office and other main town centre uses, commensurate with their scale. Neighbourhood centres are designated primarily to cater for local day-to-day shopping needs and provide services for the community (launderette, pharmacy, hairdressers etc.). Some also have concentrations of more specialist, comparison-based retailing. Specialist Areas are distinguished by their clusters of independent and niche retailing, or for the range of food and drink uses, and some may be a visitor attraction in their own right. There are also some non-designated areas, such as at railway stations, which predominantly serve commuters.

9.88 Evening and night time uses in the borough are focussed on commercial/mixed use areas of the Central Activities Zone and Camden Town town centre. Both contain a diverse range of cultural assets and entertainment uses including theatres, cinemas, live music venues and comedy clubs. These uses attract significant numbers of visitors and tourists to the borough and have a vital role in supporting jobs and economic activity and planning has an important role in ensuring the evening and night economy operates in a safe, inclusive and well managed way.

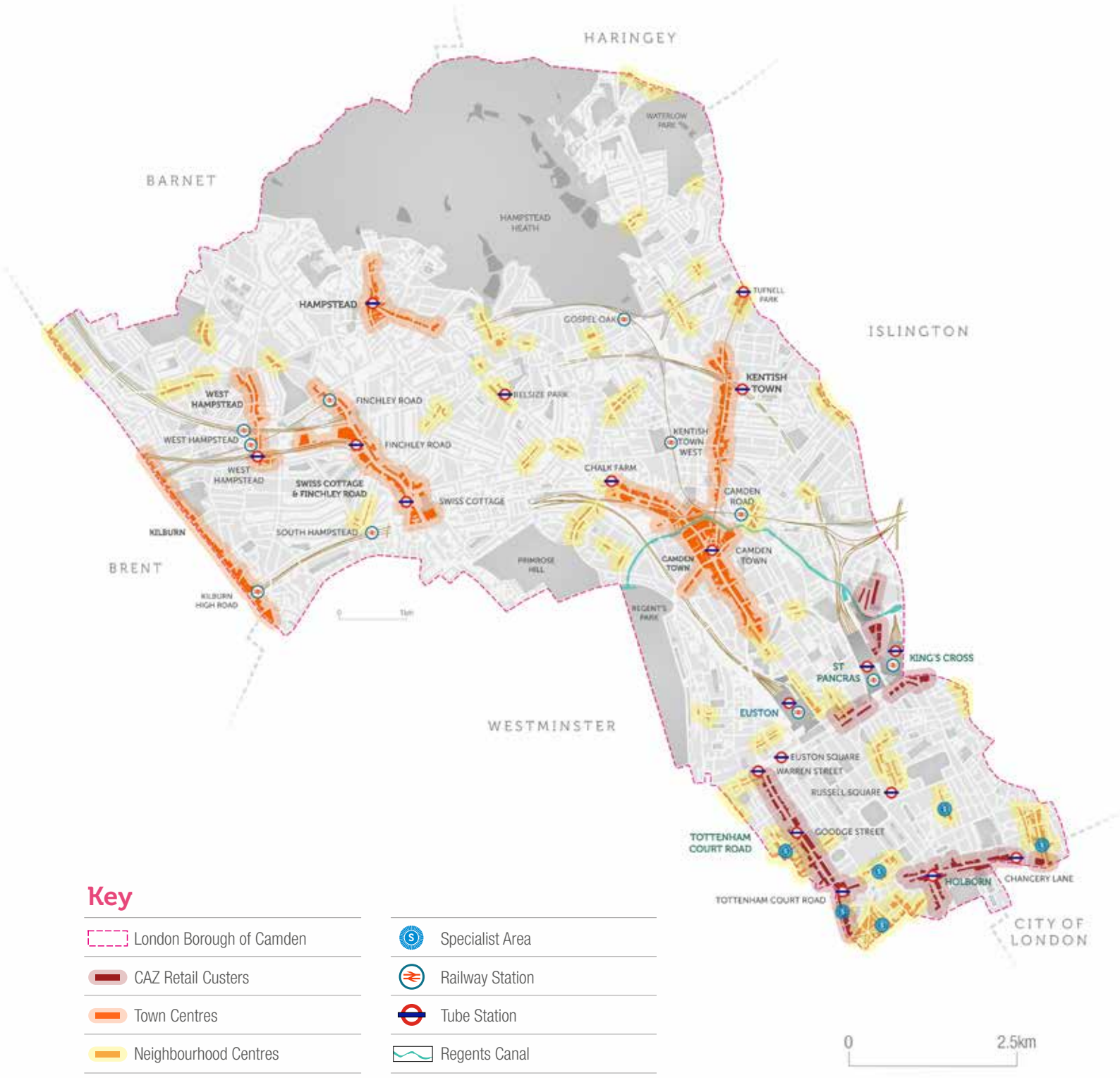
9.89 Camden's network of centres is illustrated on Figure 21 and set out in Table 10 below.

Table 10 | Camden's network of centres

CAZ RETAIL CLUSTERS
High Holborn / Kingsway
King's Cross / St Pancras
Tottenham Court Road / Charing Cross Road / New Oxford Street
Coal Drops Yard
King's Boulevard
TOWN CENTRES
Camden Town
Finchley Road / Swiss Cottage
Hampstead
Kentish Town
Kilburn High Road
West Hampstead
NEIGHBOURHOOD CENTRES
There are 39 neighbourhood centres in the borough, which are identified on the Policies Map
SPECIALIST AREAS
Covent Garden
Denmark Street
Hatton Garden
Museum Street
Charlotte Street
Lamb's Conduit Street

Figure 21:

Camden's Centres



Key

- London Borough of Camden
- CAZ Retail Custers
- Town Centres
- Neighbourhood Centres
- Specialist Area
- Railway Station
- Tube Station
- Regents Canal

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Policy IE6

Supporting Designated Centres and Essential Services

A. The Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. The Council will:

1. seek to protect and enhance the role and distinctive character of each of Camden's centres, ensuring that new development is of an appropriate type, scale and character for the centre in which it is located, having regard to the network of centres set out in Table 10 and their associated catchments;
2. support the provision of additional retail floorspace over the Plan period to provide for and maintain a range of shopping opportunities, including top-up facilities to meet the essential needs of local communities, and to enhance the offer of individual centres;
3. support other cultural, community, leisure and service-oriented uses where they positively contribute to the character and role of the centre in which they are located and provided this does not materially reduce access to other essential services used by the local community;
4. support the use of vacant or under-utilised properties for temporary (meanwhile) uses that will benefit a centre's vitality and viability;
5. support proposals which would significantly change the role of an existing CAZ retail cluster or town centre, where this forms part of a comprehensive planned approach for the area;
6. give priority to sustaining the existing role of neighbourhood centres and specialist areas. The loss of Class E uses will be supported where there is evidence that the centre is in decline and struggling relative to other centres in Camden performing a similar role and function and where the proposed alternative use would help to reinforce the vitality and viability of the rest of the centre;
7. resist the loss of active ground floor uses visited by members of the public to ensure the vitality of the centre is retained;
8. seek to widen the range of evening and night-time economy uses where there are existing concentrations of these uses and where this would be beneficial for local residents and people working on night shifts;
9. resist proposals involving the formation of larger units where this would harm the character or role of a centre, particularly where this would be detrimental to the supply of low cost and affordable space and the centre has an established role in accommodating independent and specialist retail;

Policy IE6

Supporting Designated Centres and Essential Services

10. expect developments providing 2,500sqm or more of retail floorspace to include a proportion of smaller units, including floorspace available at a discount to market rents;
11. seek to retain shops and other valued amenities outside of designated centres where they have an essential role in meeting the needs of local communities;
12. expect new frontages to be well designed and respond to positive examples in the local street scene in terms of proportion and local impact. Excessively sized fascias and a proliferation of signage or adverts will be resisted. The Council will expect historic shopfronts and features to be retained; and
13. seek to secure contributions towards improving infrastructure, including environmental improvements (such as bins and benches), better walking, cycling and public transport, and community safety measures.

Sequential approach

B. The Council will apply a sequential approach to proposals for the provision of main town centre uses, as defined in the National Planning Practice Framework, outside of the designated town centres listed in Table 7 above, to support the borough's network of centres. These uses should be located within designated centres and only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or, if no edge of centre locations are available, out of centre locations. In applying the sequential approach, we will consider the likelihood of suitable sites becoming available in designated centres or edge of centre locations within a reasonable period (i.e. the next 3 years).

C. The Council will require an impact assessment for developments of 2,500 sqm or more that:

1. would be in an edge of centre or out of centre location; or
2. would be in an existing centre and have the potential to have a harmful impact on other centres.

D. The Impact Assessment will be required to demonstrate that the proposal would not harm the vitality and viability of centres or the delivery of major planned investment.

Protecting the vitality and viability of centres

9.90 The Council will protect and enhance the role and character of each of Camden's centres by assessing proposals against Policy IE6, and having regard to the descriptions and planning objectives for individual centres set out in Camden Planning Guidance: Town Centres and Retail. It is recognised that there are several centres in Camden that form part of a wider town or neighbourhood centre that extends beyond the borough boundary. When assessing proposals at these locations we will give consideration to the full extent of the centre, not just the part within Camden.

9.91 Councils have much less ability to manage the mix of shopping, and some food and drink uses in centres since the introduction of Use Class E brought together a wide range of uses. Changes between uses within Class E do not constitute development and therefore planning permission is no longer required. Where it is feasible to do so (such as for the redevelopment of existing premises), we may seek the provision of a particular type of Class E floorspace, for example where this is necessary to sustain the health of the centre.

9.92 As part of our strategy for protecting town and neighbourhood centres and CAZ retail clusters, the Council has used its planning powers to introduce two Article 4 directions to remove a permitted development right that allows uses within Class E (Commercial, Business and Service) to change to residential use without planning permission. This means that planning permission is again required for such changes of use and the Council can assess proposals against our planning policies, including consideration of the impact on the centre.

9.93 The National Planning Policy Framework retains reference to Councils defining 'primary shopping areas'; that is, areas where retail development is concentrated. We intend to carry forward existing 'Primary Frontages' on the Policies Map, as primary shopping areas, as this will provide the ability to manage the over-concentration of particular 'sui generis' uses (which do not fall within any planning use class), which may be detrimental to a centre's established character or role. We will also continue to apply our amenity and transport policies to ensure that certain uses do not result in unacceptable impacts arising from noise, odour, waste or from deliveries and servicing, with larger proposals expected to be situated in locations with good public transport accessibility.

9.94 The National Planning Policy Framework also advocates the use of the sequential test and impact assessments by Councils to ensure that main town centre uses are provided in suitable locations. In Camden, this will apply to designated town centre boundaries. The approach is well-established and gives preference to 'edge of centre' locations when suitable sites cannot be found within a designated centre boundary. Where development is proposed in an edge of centre location, the Council will seek proposals that are well-related to existing uses in the centre.

Future floorspace needs

9.95 The Council's Retail and High Streets Needs Assessment ('the Retail Study') has considered current capacity and future demand for retail uses. The Retail Study estimates requirements for additional convenience and comparison floorspace from 2023 to 2041 based on likely expenditure and population growth. It envisages that online spend remains high but will grow at a slower rate than in the recent past. The study found that overall demand for additional convenience and comparison space is likely to be low over the Plan period. The amounts are such that this need could be satisfied largely through the reoccupation of vacant units. There are also a number of sites with planning permission for retail floorspace, some of which are under construction. Implementation of these schemes would reduce this demand even further.

9.96 It is considered that CAZ retail clusters and designated town centres have the most capacity to support change and growth. The Council has prepared planning frameworks for the key areas where change is expected. The Local Plan's site allocations identify some sites where further retail and leisure uses are likely to be accommodated, often through mixed-use developments. This includes the provision of low-cost retail space as part of the planning consent for the 02 site in Finchley Road. It is envisaged that over the Plan period, the development of Euston Station will allow for new retail and leisure uses to serve commuters and local communities. Further detail on what is expected is set out in the Euston Area Plan.

9.97 The Council's Retail Study found that some centres have a potential unmet need for additional convenience and comparison floorspace, particularly towards the end of the Plan period. However, in reality the scale of need is such that it can be readily accommodated through the turnover of existing premises.

The changing role of centres

9.98 Many centres in Camden have a stable retail role and an established character. However, restructuring in the retail sector and volatility in consumer spending underlines the need for centres to be able to adapt rapidly to change. Since the introduction of Class E, pubs and bars have been designated as 'sui generis' uses, which means they enjoy greater protection from changes to the wide range of activities covered by Class E. These uses can make a positive contribution to a centre and successfully integrate with the centre's existing role. However, there may be a need to limit their proliferation, where concentrations of such uses could undermine the health of the centre in terms of its appeal, or have unacceptable impacts on surrounding uses or residential populations.

9.99 When there are vacant premises in centres, particularly outside of the primary areas or in neighbourhood centres, this can provide an opportunity to introduce new uses and activities that benefit local communities, especially where start-ups, entrepreneurs and voluntary, community sector and third sector organisations can struggle to secure premises at rents they can afford. Examples include affordable workspace, circular economy uses (such as repair shops), artist studios and cultural activities. The Council will support the reuse of premises as meanwhile uses in line with Policy IE1 (Growing a Successful and Inclusive Economy). We will give priority to proposals that can demonstrate a social, cultural or economic development benefit.

9.100 Neighbourhood centres are much smaller in scale than designated town centres and mainly focussed on meeting the essential needs of local communities, while Specialist Areas are much more significant in terms of their visitor draw. The Retail Study identified the individual role and mix of uses in these centres and found they are functioning well. Changes in these centres are expected to be limited. Where proposals do come forward, they should contribute positively to the health of the centre, or area, and be compatible with its size and capacity.

9.101 The Council will continue to actively monitor changes in centres through undertaking periodic retail surveys (with the findings hosted on Camden Open Data).

Ground floor uses

9.102 Key to the vitality and viability of centres is retaining a cohesive mix of uses at ground floor level. Where frontages become broken, it can impact on the appeal of a centre. While the Local Plan supports additional housing in centres, where shops, food and drink or other local services at the ground floor level are converted to homes they are likely to stay in residential use permanently, meaning their potential benefit for commercial or community functions is lost.

9.103 Ground and basement floors can be particularly exposed in terms of noise and disturbance and poor air quality due to their proximity to busy roads, junctions and transport infrastructure and are therefore often not suitable for permanent living accommodation.

9.104 Given this, we will seek to retain active uses on the ground floor of centres. These are considered uses visited by members of the public and related to the role of the designated centre. Exceptions will be allowed for affordable workspace where this addresses the long-term vacancy of a unit.

Evening and night time economy

9.105 The Council has an Evening and Night Time Economy Strategy (ETNE Strategy) that looks at ways of increasing the social and economic benefits arising from evening and night-time activity, particularly through the introduction of new business and cultural activities and extending the hours of existing cultural and community uses and visitor attractions beyond 6pm. The borough's evening and night time economy is the sixth largest nationally with the broadest mix of uses focussed within Camden's part of the West End and in Camden Town, including important cultural and performance spaces such as KOKO and The Roundhouse. However, in recent years, dedicated spaces for protected groups, such as LGBT+ communities have closed, and the eclectic mix of live music venues has been threatened by severe financial pressures. The ETNE Strategy wants the evening and night-time economy to remain dynamic and to grow responsibly, create good work opportunities and be accessible to all. It also highlights concerns about the impacts of homogenisation and the importance of protecting what makes Camden unique.

9.106 The Council will support the more diverse use of venues, spaces and amenities, particularly where this helps to define the evening offer beyond alcohol-led activity. Local surveys suggest that older residents, women and some of our most easily ignored communities, including young people, can feel excluded due to the cost of going out, or concerns about personal safety. There is also an under-provision of attractions oriented towards families. Over 10% of Camden residents live in a recognised 'hotspot' for evening and night time activity and while there are benefits from such close access, impacts from noise, anti-social behaviour and commercial catering on local air quality highlight the continuing importance of assessing the amenity of proposals in line with Local Plan policies and ensuring effective management and operational plans are put in place.

9.107 The ETNE Strategy also draws attention to the high proportion of night time workers in Camden, with particular challenges around well-being, pay, job security and the provision of training and development being reported. Night shift workers can also find the range of activities/uses much more limited with difficulties in accessing even basic services. Where our planning powers allow, we will support efforts to increase the diversity of evening and night-time uses, having regard to the impacts on local residents and existing venues as well as the specific needs of night shift workers.

Smaller premises and essential out of centre services

9.108 The Council will seek the retention of smaller premises in centres where these form an established part of the centre's character and the premises has a potential economic role, and where a specific local need is identified in a neighbourhood plan. We will take into account the availability of smaller premises elsewhere in the centre and in other centres nearby. For large major schemes, we will expect the applicant to consider the provision of smaller units, including discounted workspace to ensure businesses of all sizes have access to suitable space. The approach will be applied flexibly having regard to the function and role of the centre in which the development is proposed; whether the scheme is in an established frontage; current vacancy levels; and the total supply of smaller units within the centre. There may also be a need for some of this floorspace to be provided below market rents to support start-up and independent businesses. The Council's 'Affordable Workspace Strategy' identifies an unmet need for affordable retail in parts of the borough. It is most likely to be deliverable on the largest sites (ie. providing 2,500 sqm or more of retail floorspace) and could potentially form part of a scheme's affordable workspace offer secured through Policy IE4 (Affordable Workspace).

9.109 The introduction of Class E means it is harder to ensure the protection of small, stand-alone convenience stores (sometimes known as 'corner shops') as it is possible to change to some non-retail uses without planning permission. As part of the Retail Study, we have reviewed the role of a number of smaller non-designated parades and, consequently, two new neighbourhood centres are proposed to be designated in King's Cross Road and Haverstock Hill south (Steele's Village). We will also seek to avoid the loss of essential services (such as a corner shop or café) where they have a longstanding and valued role in serving residents living nearby. Furthermore, the Council has long recognised the importance of public houses for the social fabric of our communities and Policy SC7 (Public Houses) sets out how these premises will be safeguarded.

Design and environmental quality

9.110 In line with the Local Plan's design policies, we will expect new premises to respond creatively to their context. New shopfronts will be expected to respond closely to the prevailing scale, form, proportions and materials. In some centres, frontages have a marked uniformity, with fine examples of shops and services being created on the ground floors of town houses and mansion blocks. Where historic shopfronts positively contribute to local character, they should be retained. In line with the approach for ground floors, active frontages will be sought as these add interest and vitality where passers-by are able to see into the building and provide safety through 'eyes on the street'.

9.111 The quality of the environment and its accessibility can have a significant impact on how well a centre performs. The Council will expect developments to contribute to local infrastructure projects, proportionate to the scale and impact of the scheme. It is expected that centres will continue to be a focus for efforts to improve active forms of travel and create greener, healthier places. We will also support measures to provide more disability and age-friendly environments, such as new seating, ramps and the removal of street 'clutter', alongside improvements to ensure a centre works better for all; for example, providing more litter bins and public conveniences.

9.112 The Local Plan is accompanied by an Infrastructure Delivery Plan which sets out interventions that will help to better connect centres with surrounding neighbourhoods. Furthermore, the Retail Study features 'health checks' for all centres which consider overall environmental quality, including perceptions of how well a centre is managed or maintained.

9.113 The ETNE Strategy identifies how Camden can be a safe, welcoming and inclusive place to spend time in the evening and at night, for example through improved lighting; greater participation of licensees in the stewardship of public space outside of their premises, and initiatives such as the Camden Safety Hubs. We will therefore seek contributions from development to enhance access and community safety.

Hot food takeaways

9.114 In common with the situation nationally, there are concerns about the high and increasing levels of obesity in Camden.

9.116 Childhood obesity is associated with physical and mental health conditions. Children that are overweight or obese are also likely to remain so into adulthood, with a greater risk of poor health and well-being as a result.

9.117 The National Planning Policy Framework states that policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, including having access to healthy food. In planning for the local community's needs, councils are expected to give regard to local health strategies and should aim to improve health for all sections of the community.

9.118 The London Plan seeks to create a healthier food environment within the context of reducing health inequalities overall, increasing the availability of healthy food, and restricting unhealthy options. It states that boroughs should manage clusters of retail uses, having regard to their positive and negative impact on the objectives of the Plan, including mental and physical health and well-being. It is considered that the approach set out in the London Plan is relevant to Camden's circumstances and is necessary to address concerns about the consumption of high calorie fast food in the borough.

9.119 The Council will apply the approach to managing hot food takeaways set out in Policy IE7 based on local evidence and data.

Policy IE7
Hot Food Takeaways

A. To minimise harm to health and well-being the Council will:

1. resist new hot food takeaways where they would be located within a 400 metre walking distance of the entrance or exit of an existing or proposed primary or secondary school or a sensitive use;

2. resist new hot food takeaways elsewhere in the borough, where these would increase the total number of hot food takeaways within a designated centre, above the current Camden Retail Survey baseline; and

3. require applicants for new hot food takeaways to undertake a Health Impact Assessment in accordance with Policy S1 (Health and Well-being) to demonstrate that the proposal will not impact on existing health needs and levels of overweight and obesity in the local area.

9.120 The Council's data shows there are already high concentrations of hot food takeaways in some centres, including in proximity to schools. There also tend to be higher numbers of takeaways in areas with higher proportions of children experiencing weight issues. It is acknowledged that the policy is only able to prevent the further proliferation of hot food takeaways as part of a wider set of actions to promote healthy lifestyles. This includes the Local Plan's support for increased access to nutritious and affordable food through community food growing and a range of initiatives being undertaken beyond planning.

9.121 The policy extends the London Plan's approach to other sensitive uses such as youth clubs and children's play areas. 400 metres is a distance considered to be equivalent to a 5-minute walk. When applied geographically, the 400 metre buffer covers most of Camden's centres with some exceptions. Given this, elsewhere in the borough (outside of the buffer), it is considered necessary to have a limit on the proportion of these uses due to their impact on public health. In such cases, the total number of takeaways in the centre should not exceed that recorded at the time of the Council's latest Camden Retail survey (these are available at the Council's Open Data site).

9.122 Where new hot food takeaways are proposed we will expect applicants to undertake a Health Impact Assessment (HIA) in line with Policy SC1 (Improving Health and Wellbeing). HIAs will also be sought for delivery-led food businesses due to their role in facilitating orders of fast food, see Policy IE9 (Hot Food Takeaways). As part of the HIA, the applicant should consider the role of healthier menu options.

Gambling uses

9.123 Gambling Gambling can be a source of serious harm to individuals, families and communities, with the most socio-economically disadvantaged groups experiencing the highest levels of problem gambling and the greatest proportions of residents at risk of harm.

9.124 Gambling can negatively affect the physical and psychological health of people who gamble, and affect the well-being of those around them. Gambling premises in Camden tend to be concentrated where the population is much more vulnerable to gambling-related harm, and therefore Policy IE8 seeks to resist further clustering in these areas. The policy also resists new gambling premises within a walking distance of schools and in other sensitive locations.

9.125 The Council considers limiting further proliferation of gambling uses is a beneficial intervention in those parts of the borough where local populations are at disproportionate risk. Gambling-related uses include betting shops/ bookmakers, adult gaming centres and casinos. We are taking a data-driven approach, resisting further openings of these uses based on where the relative risks of problem gambling are highest.

Policy IE8
Gambling Uses

A. To minimise the impact of gambling-related uses on the health and well-being of Camden's communities the Council will resist new gambling-related uses, and extensions to existing gambling related uses, within:

1. the Central Activities Zone; the town centres of Camden Town, Kentish Town, Finchley Road/Swiss Cottage, Kilburn High Road and West Hampstead; Specialist Areas; and neighbourhood centres, where the proposal would increase the total number of gambling uses within the designated centre, above the current Camden Retail Survey baseline; and
2. a 400m walking distance of the entrance or exit of an existing or proposed primary or secondary school, or in proximity to sensitive uses.

B. The Council will require applicants providing new gambling-related uses to undertake a Health Impact Assessment in accordance with Policy SC1 (Health and Well-being) to demonstrate that the proposal will seek to minimise the likelihood of gambling-related harm, particularly for vulnerable individuals.

9.126 The Council has mapped gambling-related harm based on a variety of place-based factors including age, ethnicity, mental health and use of gambling treatment. This shows that the areas of greatest vulnerability to gambling-related harm are in the south of the borough and areas within or near to designated town centres. This corresponds to where there are the greatest number of gambling uses, with the highest concentration found in Camden Town town centre. Siting new gambling premises in these areas would increase the risk of gambling-related harm for communities living in these areas. Resisting planning applications for new gambling premises, including extensions to existing facilities, is therefore necessary to reduce the likelihood of even greater.

9.127 Children and young people (under-18s) are unlikely to gamble in betting shops. However, displays in shop windows are highly visible to young people and this exposure makes young people who already gamble increase their gambling activity (even if this is not in the betting shop itself). We will therefore resist new gambling premises within a 400m walking distance of schools. Gambling uses will also be considered to be inappropriate where sited in proximity to sensitive uses, such as debt and addiction support services, due to the risk this presents for those most vulnerable people in our communities, to gambling-related harm. Gambling uses are also not considered to be appropriate in any Specialist Areas due to their defined role. Baseline numbers of gambling-related uses will be taken from Camden's latest Retail survey data (available at the Council's Open Data site).

9.128 Where gambling-related uses are proposed we will expect applicants to undertake a Health Impact Assessment (HIA) in line with Policy SC1 (Improving Health and Well-being). As part of the HIA, the applicant should consider how any harms arising from gambling-related activity can be minimised, and preferably avoided.

Delivery-led food businesses

9.129 There has recently been a significant rise in the demand for sites to provide delivery-led food businesses (sometimes referred to as 'dark kitchens'): standalone food preparation facilities for cafes, restaurants and takeaways whose food is delivered directly to the consumer.

9.130 These are generally internet-based services and are popular due to their convenience and rapid delivery times.

9.131 While there are potential sustainability benefits from consolidating and delivering multiple orders, the intensive activity associated with their use can cause significant levels of disturbance for their immediate neighbours due to noise and odour. There can also be safety issues associated with the frequency of delivery vehicles movements involved. Such uses can also be linked to concerns about local public health.

9.132 Policy IE9 seeks to ensure that the impact of delivery-led food businesses is effectively managed.

Policy IE9

Delivery-led Food Businesses

A. The Council will only permit proposals for delivery-led food businesses ('dark kitchens') where:

1. there will be no unacceptable adverse impacts on neighbours or the local area from the premises or from delivery vehicles and staff;

2. vehicle movements are minimised and sustainable transport practices have been adopted with priority given to bicycles and cargo bikes. The Council may set limits on the number of vehicle movements and hours of operation;

3. the premises will operate in accordance with an approved Travel Plan and Delivery and Servicing Management Plan; and

4. they are accompanied by a Health Impact Assessment demonstrating that the proposal will not impact on existing health needs and levels of overweight and obesity in the area and that consideration has been given to improving access to healthy food options.

9.133 New delivery-led food businesses should be avoided where they would be in proximity to residential uses, unless it can be demonstrated to the Council's satisfaction, that there will be no unacceptable adverse impacts on neighbours or the local area. Promoters of 'dark kitchens' will be expected to demonstrate that they have undertaken a borough-wide search for suitable premises and that no other suitable premises are available, that would give rise to less adverse impacts on the local community.

9.134 Delivery-led food businesses are often found within larger employment sites helping to achieve separation from residential properties. The nature of these operations means there tend to be a large number of vehicle movements which can create nuisance for nearby residents and the wider neighbourhood. This may be exacerbated where there is an over-concentration of these uses in one location. Applicants will be expected to make commitments to use low emission and low noise vehicles, with preference for deliveries via bicycle where possible.

9.135 Due to the frequency of collections and deliveries, the Council may also require a marshal to be provided during hours of operation to ensure any impacts can be managed successfully. There is also a concern from a public health perspective that delivery-led food businesses could increase unhealthy food choices and lead to significant health consequences, as set out in Policy IE7 (Hot Food Takeaways). The Council will therefore require applicants to prepare a Health Impact Assessment (HIA) setting out how access to healthy food options will be provided. Further information on Health Impact Assessments is set out in the supporting text of Policy SC1 (Improving Health and Well-being).

Markets

9.136 Camden Town has an internationally renowned concentration of markets which are an important attraction for visitors and tourists and a defining part of the borough's identity.

9.137 There are also eight street markets in Camden, which can provide an important source of fresh food, often grown more locally than food from supermarkets. In line with local public health objectives, this role can potentially be strengthened to further improve residents' access to affordable and nutritious food.

9.138 Markets can be important places of social and cultural exchange and in some cases help to meet the specialist food needs of ethnic communities. They can have an important role in the local supply chain by providing opportunities for local manufacturers and artists to sell products in a low-cost way. In Camden Town, stalls selling goods to the public are complemented by a variety of leisure and entertainment uses. The policy approach set out below focusses on the economic role of markets in supporting local entrepreneurship and their importance in meeting the need of surrounding communities for goods and services, where gaps in provision exist. The policy also seeks to retain existing permanent market sites in the borough.

Policy IE10
Markets

A. The Council will promote and protect markets having regard to their distinctive social and economic character and role and ability to meet the needs of the local community and visitors. The Council will:

1. consider how proposals contribute to the character, role and functions of existing markets and the centre in which the scheme is located;
2. request applicants for any larger schemes (1,000sqm and above) directly impacting on a market to provide evidence of how the development contributes to a long-term vision for the market developed by the operator. The applicant will be required to demonstrate to the Council's satisfaction how the proposals will help to sustain the long-term success and viability of the core market use;
3. seek the provision of stalls and spaces at a variety of rents, with consideration given to how start-up businesses can be supported;
4. expect suitable proposals to improve the local community's access to essential goods and services;
5. resist the permanent loss of market uses unless comparable replacement provision is made, or there it is demonstrated to the Council's satisfaction there is no demand for continued market use; and
6. support new/improved markets that will not cause individual or cumulative harm to the local area and are well-designed for their users in terms of layout, accessibility and sustainability.

9.139 Due to their prominent location and intensity of use, markets are often an important contributor to the vitality and viability of centres. Changes to markets can affect their character and consequently the character and attraction of the centre. When assessing proposals, we will expect proposals to consider, and where appropriate, reflect this character. Within some centres, the Council has brought forward planning frameworks helping to guide multiple development proposals as part of an overall vision and objectives for managing change in a centre, including existing market sites. These frameworks are a material planning consideration.

9.140 Markets can perform multiple roles such as providing access to healthy food, and a range of goods, helping to complement the wider town centre offer and provide opportunities for new businesses to establish. Where larger schemes would impact on market uses, the Council will expect the applicant to explain how this contributes to a long-term strategic approach for the market. The Council will seek to ensure that proposals contribute to the positive functions markets can provide. We will also seek a variety of stalls/units to ensure that markets remain genuinely accessible for traders with different levels of experience and resource.

9.141 The impact of a market on its local community varies according to its scale and appeal as a visitor attraction. Where any major developments are proposed within a market, we will expect the applicant to ensure increased provision of services for the local community, particularly where there is evidence of local residents travelling to other centres to meet basic needs.

9.142 All markets in Camden appear to be performing a valued function and therefore will be protected unless there is convincing evidence that the market is no longer required.

9.143 Alongside their benefits, markets can, when poorly designed or managed, cause harm to surrounding areas, for example in terms of congestion on footpaths and roads, litter, refuse storage and noise. Proposals involving the creation or refurbishment of existing markets should therefore include provision for careful management; contribute to environmental and street improvements; and be designed in a way that considers how they will be used by people with disabilities. Provision for the storage of equipment and stock should also be provided in proximity to the site, wherever possible, to reduce the need for vehicular trips.

10

Supporting Camden's Communities

10 Chapter

Improving health and well-being

10.1 Planning can play a pivotal role in influencing key health determinants.

10.2 In Camden, many people are living in poor health for many years of their lives, and the gap in healthy life expectancy between the poorest and richest parts of the borough continues to widen. On average, those living in the most deprived areas spend 20 years of their life living in poor health and die around 10 years earlier than those living in the least deprived areas.

10.3 We know that health is intrinsically linked to early life experience, education, employment, housing, leisure, and the local environment – otherwise known as the social determinants of health. These are the social, cultural, economic and environmental factors that shape the conditions in which we live.

10.4 This policy seeks to ensure that development in the borough considers local issues relating to health and well-being at an early stage in the planning process in order to positively improve outcomes for the people of Camden.

Policy SC1
Improving Health and Well-being

A. The Council will continue to work closely with its partners to improve the physical and mental health and well-being of all people who live, work in, study in and visit Camden, and reduce health inequalities.

B. To support healthier communities and reduce health inequalities in Camden the Council will expect development to:

1. be designed to support good health and well-being, minimise adverse impacts on health and well-being, and reduce health inequalities;
2. provide a healthy living and working environment;
3. support healthy and active lifestyles;
4. be safe and accessible for all;
5. promote social and economic inclusion; and
6. contribute towards the provision of new or improved health facilities, in line with the North Central London's Integrated Care System requirements, where required.

C. Health Impact Assessments must be undertaken for all major applications; for non-major applications that the Council considers would have the potential to give rise to significant adverse health impacts; and for non-major applications involving sensitive uses.

D. Health Impact Assessments should be undertaken at an early stage in the design process and should make clear that the design of the proposed development makes the healthiest choice the easiest choice.

10.5 The Council's ambition is to make Camden the very best place to start well, live well and age well. To support this ambition the Council has produced the Camden Health and Well-being Strategy 2022 – 2030. The strategy sets out the shared principles, long term ambitions and short term priorities of the Council for improving health and well-being and reducing health inequalities.

10.6 Central to the Council's strategy is the 'population health' approach, which seeks to improve physical and mental health, promote well-being and reduce health inequalities across an entire population. This approach focuses on the social determinants of health and well-being and highlights the importance of creating a collective sense of responsibility across organisations and within communities to reduce inequalities and promote good health.

10.7 The Local Plan has a significant role to play in delivering the Council's Health and Well-being Strategy. Health considerations are therefore integrated into all aspects of this Plan and many measures set out in other policies will play a part in promoting population health and well-being and addressing health inequalities, for example by:

- promoting good quality, well designed, affordable and accessible housing to reduce overcrowding, improve living conditions and support health and well-being (Policies D1 (Achieving Design Excellence), D3 (Design of Housing), H4 (Maximising the Supply of Affordable Housing) and H6 (Housing Choice and Mix);
- requiring developments to contribute to the mitigation of and adaption to climate change, to reduce the impact of extreme weather events such as flooding and heatwaves on health (Policies CC1 – CC11 in Chapter 8 (Responding to Climate Change);
- ensuring that buildings and places are designed to promote healthy behaviours and be inclusive and accessible to support the needs of different groups in Camden (Policies DS1 (Delivering Healthy and Sustainable Development), D1 (Achieving Design Excellence), SC1 (Improving Health and Well-being) and SC2 (Access for All);
- protecting existing, and requiring the provision of new, social infrastructure to support communities, aid integration and reduce loneliness (Policy SC3 Social and Community Infrastructure);
- promoting healthy lifestyles, increased physical activity and improved mental health through the design of new development (Policies DS1 (Delivering Healthy and Sustainable development), SC1 (Improving Health and Well-being and D1 (Achieving Design Excellence);
- protecting existing and securing the provision of new and enhanced open space, play and sports facilities (Policies SC3 (Social and Community infrastructure) and SC4 (Open Space);
- securing investment in active travel (Policies T1 (Safe, Healthy and Sustainable Transport) and T2 (Prioritising Walking, Wheeling, and Cycling));
- ensuring that developments are designed to reduce crime and the fear of crime, and improve community safety (Policy A2 (Safety and Security));
- promoting a stronger local economy, recognising the links between income and health (Policy IE1 (Growing a Successful and Inclusive Economy));
- improving and creating better access to education, training and employment (Policy IE1 (Growing a Successful and Inclusive Economy));
- supporting healthy eating by improving access to healthier food choices and increasing opportunities for food growing (Policies SC5 (Food Growing) and IE7 (Hot Food Takeaways)); and
- managing the impact of development on health (Policy SC1 (Improving Health and Well-being) and reducing exposure to poor air quality with the aim of improving health (Policy A3 (Air Quality)).

Development and health

10.8 The creation of healthy environments will be a key consideration for the Council when assessing planning applications and the Council will expect applicants to take into account the needs of different groups when designing schemes to ensure they meet the needs of Camden's diverse communities and are inclusive and accessible.

10.9 New development has the potential to support significant improvements in health, but can also have considerable adverse impacts on health if it is inappropriately located, designed, constructed and/or operated.

10.10 To ensure that development promotes and positively contributes to a healthy living environment, development will be expected to consider both positive and negative health impacts at an early stage, prior to the submission of a planning application, with actions to enhance positive impacts and mitigate negative impacts identified. Health Impact Assessments will be an important tool for this.

Health impact assessments

10.11 A Health Impact Assessment (HIA) helps to ensure that health and well-being is properly considered as part of the planning process. The scope of a HIA will vary depending on the size of the development and its location. A HIA should identify the likely health impacts of a development and include measures to improve health outcomes and address negative effects and inequalities. The HIA should also include evidence to demonstrate that the design of the proposed development makes the healthiest choice the easiest choice.

10.12 Health Impact Assessments should be undertaken for all major applications. Major applications are regarded as developments of 10 or more homes (including student housing) or a non-residential development with a floorspace of 1,000 sqm or more. For mixed use developments, major developments are regarded as a proportional combination of homes and non-residential floorspace. HIAs for developments of 100 homes or more, including student housing, will be expected to include details of the engagement they have undertaken with local health and community stakeholders and how their input has influenced the development. Further information on HIAs can be found in Camden Planning Guidance on Amenity and the Mayor's Social Infrastructure Supplementary Planning Document, and developers will be expected to have due regard to this.

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 and for non-major developments involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take aways, betting shops and in areas where air pollution and noise issues are particularly prevalent.

10.14 Health Impact Assessments should be undertaken at an early stage in the design process and the results should be used to refine and inform the design and layout of the proposed development, to maximise the positive impacts, and minimise and mitigate adverse impacts on the health and well-being of both the existing and future population. Health Impact Assessments should make clear that the design of the proposed development makes the healthiest choice the easiest choice. Where recommendations are made in a Health Impact Assessment, these will be secured by planning condition.

10.15 As part of the process of undertaking a Health Impact Assessment, applications will be expected to consider potential suicide risks associated with the built environment, particularly in relation to tall buildings and structures, in accordance with Policy A2 (Safety and Security).

Health facilities

10.16 The North Central London Integrated Care System (NCL ICS) covers five boroughs; Camden, Islington, Barnet, Enfield and Haringey. It brings together local health and care organisations, local Councils and the voluntary, community and social enterprise (VCSE) sector to work in joined-up ways to improve health outcomes for residents and tackle inequalities that currently exist. Within the Integrated Care System an estates team is responsible for all NHS health care buildings and facilities and must be consulted on any proposals for new or replacement public health care buildings in Camden.

10.17 Policy DM1 (Delivery and Monitoring) and the Council's Infrastructure Delivery Plan set out the infrastructure requirements for the borough over the Plan period, including many that relate to improving health.

10.18 Policy SC3 (Social and Community Infrastructure) specifically states that we will resist the loss of community facilities (which includes health facilities), unless a replacement facility that meets the needs of the community is provided, or where evidence demonstrates that the facility, or similar facility, is no longer required.

10.19 We will seek contributions towards supporting existing or providing for new health facilities from developments which create an additional need for health services. In assessing additional need, the Council and NHS partners will use the NHS London Healthy Urban Development Unit's Planning Contributions Model to assess the health service requirements and cost impacts of new residential developments. We will also expect applicants to liaise with NHS partners early on in the design process to identify what mitigation is required in particular circumstances.

Access for all

10.20 Good access and inclusion benefits everyone. However, many people are disadvantaged by poor access to facilities, buildings and spaces, with d/Deaf and disabled people, neurodiverse people and older people particularly affected.

10.21 The Council has committed to work towards being an Accessible and Friendly Camden. This builds on the World Health Organisations Age-Friendly Communities approach and aims to benefit all those who, irrespective of label, or identity, feel excluded from living a good life in Camden.

10.22 For planning this means incorporating accessible and friendly design principles, such as better lighting and welcoming places to rest, making public spaces comfortable for residents and fostering positive connections between people of all ages.

Policy SC2
Access for All

A. The Council will seek to ensure that developments are designed to promote access and inclusion, and that the barriers which prevent everyone from accessing facilities and opportunities are removed. The Council will:

1. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all in accordance with Policy D1 (Achieving Design Excellence) and Policy SC3 (Social and Community Infrastructure);
2. require accessible and adaptable housing to be provided in accordance with Policy D3 (Design of Housing);
3. expect housing and mixed use development schemes to incorporate dementia friendly measures;
4. expect new social and community infrastructure to be located where it is easily accessible to those who will be using it, in accordance with Policy SC3 (Social and Community Infrastructure);
5. expect streets, public spaces, and routes between buildings to be designed to be fully accessible, with clear, easy to read signage in accordance with Policy T1 (Safe, Healthy and Sustainable Transport) and Policy T2 (Prioritising Walking, Wheeling and Cycling);
6. expect development to avoid street clutter and ensure that street furniture, including phone boxes and advertisements, is located to allow the unobstructed movement of people, wheelchairs, mobility scooters and pushchairs;
7. expect major developments, and those providing new public space, to consider the sensory needs of neurodiverse people and where appropriate make provision for quiet areas that are safe, welcoming and accessible;
8. ensure that water fountains and free publicly accessible toilets suitable for a range of users, including d/Deaf, disabled and blind people, are provided, where appropriate, in new or enhanced open spaces and public places;
9. expect play areas to be designed and constructed to meet the physical and sensory needs of d/Deaf, disabled, blind and neurodiverse children and teenagers;
10. encourage the provision of public transport in Camden that is easily accessible to everyone in accordance with Policy T3 (Public Transport); and
11. secure car parking for disabled people in accordance with Policy T5 (Parking and Car Free Development).

Accessible buildings

10.23 Many people experience difficulties in using buildings as their access needs are either ignored or considered too late in the development process to ensure inclusive design principals are included.

10.24 The Council will expect all buildings to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all. As accessibility is influenced by perception, as well as physical factors, buildings should also be designed to appear, as well as be, accessible.

10.25 Appendix 2 sets out a number of measures which, if implemented successfully, should create an inclusive and accessible environment.

10.26 Access arrangements should be considered and addressed from the beginning of the design process as they are an integral aspect of building design. Overcoming access barriers at a later stage in the project can result in a building or space that is not inclusive and may be inaccessible to many people.

10.27 We will require a Design and Access Statement for new developments in accordance with D1 (Achieving Design Excellence) to show how the principles of inclusive design, including meeting the specific needs of d/Deaf people, disabled people, blind people and neurodiverse people, have been integrated into the proposed development and how inclusion will be maintained and managed.

10.28 The Council will balance the requirement to provide access with the interests of conservation and preservation. We will seek sensitive and creative design solutions to achieve access for all, to and within listed buildings. Policy D5 (Historic Environment) sets out our detailed approach to development affecting listed buildings and other heritage assets.

Streets and places

10.29 Making sure that people can move through streets and places easily and safely is as important as making buildings themselves accessible. The Council will therefore expect improvements to be delivered for all users, recognising the diverse needs of different groups, to ensure good access and circulation arrangements, including improvements to existing routes, surfaces and footways.

10.30 In recognition of Camden's growing older population, the Council also strongly encourages the inclusion of dementia friendly design. Design can have an impact on the ease with which people with dementia are able to navigate around or through an area by lighting (avoiding deep shadows), materials, clear signage, distinctive buildings and use of colour.

10.31 As part of this, care should be taken to ensure that routes around buildings are clear and free from obstruction, especially to the entrance. Any obstructions should be made clear and avoidable, for example by changes in surface texture. The Council's approach to delivering safe, healthy and sustainable transport and prioritising walking, wheeling and cycling is set out in policies T1 and T2 of the Local Plan. The Camden Streetscape Design Manual and Camden Planning Guidance on Design also provide further guidance on this issue and developers will be expected to have due regard to this.

Public toilets

10.32 Public toilets are a vital facility and are especially important for certain groups including disabled people, older people, people with babies and young children, pregnant women and people with particular health conditions. Access to public toilets gives people more confidence to move around the borough and spend more time in a place or space.

10.33 The Local Plan safeguards public toilets as 'social and community infrastructure' in accordance with Policy SC3 (Social and Community Infrastructure).

10.34 The Plan promotes the provision of free, publicly accessible toilets suitable for a range of users in new or enhanced social and community infrastructure and open spaces, in accordance with Policy SC2 (Access for All), Policy SC3 (Social and Community Infrastructure), Policy SC4 (Open Space) and Policy D1 (Achieving Design Excellence).

10.35 The London Plan requires large-scale development, defined as being those that are open to the public, and large areas of public realm, to provide and secure the future management of free publicly accessible toilets suitable for a range of users, and free 'Changing Places' toilets. The Council will therefore seek the provision of public toilets in accordance with the London Plan and have identified specific site allocations where public toilets will be sought.

Public transport

10.36 The Council aims to increase the attractiveness of public transport by creating networks which make people feel safe, link to all parts of the borough and enable use by everyone including disabled people. The provision of public transport allows independence in travel choices and is vital to those without access to, or without the means to use, a car. The Council's approach to supporting the provision of public transport in Camden is set out in Policy T3 (Public Transport).

Parking

10.37 While the Council encourages the use of public transport and promotes car-free schemes in line with sustainable development objectives, we recognise that some disabled people rely on private motorised transport. We will therefore require relevant planning applications to demonstrate how the needs of disabled drivers have been addressed. Where appropriate, the Council will support provision of disabled parking and drop-off facilities which are integrated with public transport facilities. The Council's approach to parking is set out in Policy T5 (Parking and Car Free Development).

Accessible homes

10.38 The Council believes that new housing should allow less mobile residents to live as independently as possible. Accessible homes give them greater choice about where to live and mean people are less likely to need to move when they become less mobile. The Council's approach to accessible and adaptable dwellings and wheelchair user dwellings is set out in Policy D3 (Design of Housing) and in Camden Planning Guidance on housing. Developers will be expected to have due regard to these.

Social and community infrastructure

10.39 Social and community infrastructure can help to enhance quality of life and social cohesion, improve personal health and well-being, reduce social isolation, instil a sense of community identity and belonging, and help reduce crime and anti-social behaviour.

10.40 The term "social and community infrastructure" in this section refers to a wide range of infrastructure that provides a service to the community. This includes:

- childcare;
- education;
- adult learning and training;
- healthcare;
- emergency services including police stations;
- civic uses;
- youth provision;
- laundrettes;
- community halls and meeting places for the principal use of the local community;
- libraries;
- places of worship;
- play spaces;
- public toilets;
- indoor and outdoor sports and recreation facilities;
- public houses (see Policy C4 (Public Houses); and
- cemeteries, crematoria and burial spaces.

10.41 This list is not intended to be exhaustive and other facilities may also be considered to provide social and community infrastructure.

10.42 Policy SC3 sets out the Council's approach to the protection and provision of social and community infrastructure in Camden. A list of social and community infrastructure projects to be delivered to support development in Camden is set out in the Council's Infrastructure Delivery Plan. Area and site-specific infrastructure needs are also set out in the Plan's area-based polices and site allocation policies, and in other Development Plan Documents, Neighbourhood Plans and Area Frameworks.

Policy SC3
Social and Community Infrastructure

A. The Council will work with its partners to ensure that social and community infrastructure is developed and modernised to meet the changing needs of Camden's communities and support the delivery of services.

Provision of new or improved Social and Community Infrastructure

B. The Council will seek planning obligations to secure contributions towards new and improved social and community facilities and services to mitigate the impact of development.

C. The Council will support the provision of new, improved and extended social and community infrastructure where proposals:

1. meet the needs of the intended users and promote community integration and inclusion;
2. are designed to be safe, inclusive, welcoming and accessible for all in accordance with Policy SC2 (Access for All) and Policy D1 (Achieving Design Excellence);
3. do not have an unacceptable impact on amenity in accordance with Policy A1 (Protecting Amenity). Proposals that may have a significant impact on the amenity of neighbours should be accompanied by a community use plan;
4. satisfactorily address the impacts of changes to the balance and mix of uses in the area, including the cumulative impact of schemes with planning permission or awaiting determination;
5. maximise opportunities for shared use and co-location of facilities, where practical;
6. are accessible to the community they are intended to serve by sustainable modes of travel;
7. provide free, publicly accessible toilets (including Changing Places toilets, where appropriate), baby change, Wi-Fi and drinking water facilities, where practical; and
8. can demonstrate to the Council that funding arrangements are secured for the future maintenance and management of the facility.

Policy SC3
Social and Community Infrastructure

Protection of existing Social and Community Infrastructure

D. To safeguard social and community infrastructure in Camden, the Council will:

1. ensure existing social and community infrastructure is retained, recognising their benefit to the community, including protected groups, unless:

    a. a replacement facility is provided. Any facility must be of at least equivalent quality, quantity and accessibility to that of the existing facility, and must meet the needs of the local population, or its current, or intended users; or

    b. it can clearly be demonstrated to the Council's satisfaction that the existing facility is no longer required on site. The Council will expect the developer to provide marketing and vacancy evidence for a 12 month period to assess continued demand for the existing use and all other suitable social and community infrastructure uses that could be accommodated on the site. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a social or community use, then our preferred alternative will be the maximum viable amount of affordable housing.

2. take into account listing or nomination of 'Assets of Community Value' as a material planning consideration.

Meeting the need for community infrastructure

10.43 It is important that new development does not place unacceptable pressure on existing community facilities and that there is sufficient provision to support new residents. It is also recognised that some community facilities serve a catchment extending outside the borough boundary and that the needs of residents in adjoining boroughs will also need to be considered, where appropriate.

10.44 The Council will seek section 106 planning obligations, where necessary, to ensure that the additional demand a development places on existing community infrastructure and services is met. When using Section 106 agreements, the Council will take into account viability as a factor in determining the types of facilities or services that are required and the timeframe in which these can be delivered.

Provision of new, improved or extended social infrastructure

Meeting the needs of the intended users and wider community

10.45 Providers of new, improved or extended social and community infrastructure are encouraged to engage early in the development process with ward members and local communities, including any Neighbourhood Forums covering the area. This ensures that local people can meaningfully input into a scheme's development and that new provision meets the needs of both the intended users and the wider community. The process undertaken should be detailed in the Design and Access Statement accompanying the planning application. Further guidance on Design and Access Statements is set out in the supporting text to Policy D1 (Achieving Design Excellence) and in Camden Planning Guidance on Design. Developers will be expected to have due regard to these.

Design for all

10.46 Where new floorspace is provided, applicants should submit plans showing the proposed design, layout and fit out as part of the planning application, unless the Council agrees that this is not required. Plans should demonstrate that the development achieves the highest practical standards of accessibility, safety and inclusion and provides a welcoming environment for all. For further information on accessibility and safety please see Policy SC2 (Access for All), Policy D1 (Achieving Design Excellence), Policy A2 (Safety and Security), and Camden Planning Guidance on Design and on Access for All. Developers will be expected to have due regard to these.

10.47 Some community facilities offer particular support and safe environments for protected groups and/or communities both in Camden and the wider area. However, a range of barriers can prevent protected groups and communities from accessing social and community infrastructure, for example sports and leisure facilities. Planning and design have an important role in addressing these barriers and ensuring that new developments create environments that are welcoming, inclusive and accessible for all.

10.48 Under the Equality Act 2010, the Council is required to assess the impact of policies against the 'protected characteristics' of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, sex/gender and sexual orientation. The Council will therefore expect proposals for new social and community infrastructure to take into account the needs of these protected groups, as part of the design of the scheme, to ensure that the development meets the needs of all.

Impact on amenity

10.49 The scale and intensity of the use of some social and community facilities can lead to adverse impacts on residential amenity. This is principally related to the movement of large numbers of people at certain times of day, which can give rise to impacts such as noise and air pollution, and create pressure on the transport system. Proposals that may have a significant impact on the amenity of neighbours should be accompanied by a community use plan, detailing the use and a list of the activities proposed; for example, services of worship, clubs and meetings, and the likely number of people attending, the number of staff, proposed hours of operation and any use management measures proposed.

Balance and mix of uses in the area

10.50 The Council will ensure schemes satisfactorily address the impacts of changes to the balance and mix of uses in the area, including the cumulative impact of schemes with planning permission or awaiting determination. Further guidance on managing impact on amenity is set out in Policy A1 (Protecting Amenity) and Camden Planning Guidance on Amenity, and developers will be expected to have due regard to this. Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the 'school run'. The Council will refuse applications for new, or the expansion of existing, schools in these areas, unless it can be demonstrated that the number of traffic movements will not increase, in accordance with Policy A1 (Protecting Amenity) and T1 (Safe, Healthy and Sustainable Transport).

Shared use and co-location of facilities

10.51 To help sustain and improve access to community facilities for Camden residents, the Council will expect applicants to fully assess opportunities to co-locate different services or activities in one site or premises. The Council will also seek opportunities to improve access to facilities through agreements allowing the shared use of a facility by the wider community or increased hours of community access where this is practical. This provides a cost-effective, and sometimes the only viable, means of addressing deficiencies in provision and reduces the need to travel. For sports facilities, the Council will expect consideration to be given to the programming provided on the site in order to maximise sports development outcomes for the borough (e.g. improved access for local clubs).

Accessibility

10.52 The Council will assess the accessibility of a new or extended facility for its intended users based on the evidence provided in the Design and Access Statement that should accompany the planning application.

Facilities

10.53 To meet the needs of Camden's diverse communities, the Council will expect social and community facilities to, where practicable, provide accessible toilets (including Changing Places toilets where appropriate), baby change facilities, Wi-Fi and drinking water. These facilities should be free to use and publicly accessible.

10.54 Changing places toilets are larger than standard accessible toilets with extra features and more space to meet users' needs. Changing Places toilets give severely disabled people and their families the opportunity to visit public places which they otherwise would not be able to and can therefore make a significant difference to their quality of life.

Maintenance and future funding

10.55 The sustainability of the funding arrangements for new community facilities, including maintenance and management, is a serious concern. The Council will seek assurances that floorspace will be used by community groups in perpetuity and will negotiate the provision of subsidised rents where this is necessary to ensure that a facility meets its intended needs. Where the Council is unable to enter into an agreement to meet the ongoing revenue costs of a facility itself, we will expect the applicant to demonstrate how the future of the facility will be secured.

Safeguarding community facilities

10.56 Community facilities are vulnerable to pressure from uses which attract higher land values and once they are lost cannot easily be replaced. The Council will seek the retention of community facilities except in defined circumstances. This includes where there is suitable replacement provision secured through the use of a planning obligation. We will assess whether the accessibility of the replacement provision satisfactorily addresses the needs of the facility's users and how this addresses relevant plans or programmes of re-provision of public sector bodies. In exceptional cases, the Council may seek a financial contribution based on the cost of providing a replacement facility. The Council will expect replacement facilities to be of a sufficient size and design quality to facilitate the successful operation of the community use.

10.57 There may also be circumstances where a community use, either wholly or in part, is no longer required in its current use. In this instance, the applicant will be expected to demonstrate to the Council's satisfaction that the loss of the facility would neither create nor add to a shortfall in provision for the existing community use and, if it would not, that the facility is unable to address a need for any other community use in the local area. The Council will require marketing and vacancy evidence covering a 12 month period to show that the premises have been offered at a reasonable charge to community groups or voluntary organisations. The Council has set out further details in Camden Planning Guidance on community uses, leisure facilities and pubs, and developers will be expected to have due regard to this. The loss of a facility may also be acceptable where this forms part of an asset management strategy of a public or voluntary body and the loss is necessary to allow the service to continue operating successfully, for example where a facility is underused or no longer fit for purpose.

10.58 Where an alternative community use cannot be found for the existing facility, the Council will seek the provision of affordable housing as its preferred alternative use. Community facilities generally have a relatively low capital value compared with housing sites. Given this, we will seek the maximum reasonable amount of affordable housing in accordance with Policy H4 (Maximising the Supply of Affordable Housing), having regard to financial viability. We will expect the proportion of affordable housing to reflect the value of the development site in its former community use.

Laundrettes

10.59 Laundrettes are a commercial operation but nevertheless perform an important community function. They are a sui generis use, meaning that planning permission for alternative uses must be sought from the Council. Currently, there is a permitted development right allowing a change of use from a launderette to housing, but to protect laundrettes, the Council has introduced an Article 4 direction removing this right so planning permission is still required.

10.60 There is a very small supply of laundrettes in the borough, which is desirable to retain given their essential role in supporting people living in smaller and shared accommodation. We will expect applicants proposing the conversion of a laundrette to show there has been a thorough search for an alternative laundrette operator via marketing of the property. The Council will also request the applicant to provide evidence that the continuing operation of the laundrette is no longer viable, including the provision of recent trading accounts for the existing laundrette.

Assets of community value

10.61 The Council supports communities wishing to nominate 'Assets of Community Value' (ACV). These are a building or piece of land which currently, or in the recent past, furthers the social well-being or cultural, recreational or sporting interests of the local community and is realistic to think it could do so in the future. The Council will formally register the asset if it meets statutory criteria. In the event the owner decides to sell a locally listed asset, a local group can trigger a six month moratorium on the sale giving them time to raise the funds to purchase it (sometimes referred to as a 'right to bid'). Owners are required to consider community bids, but are not compelled to accept them.

10.62 The Council, when determining planning applications involving loss of community facilities, will treat the listing of an Asset of Community Value as an indicator of local support and evidence that it furthers the social well-being and interests of the community.

Open space

10.63 Camden benefits from a wide range of public open spaces. These spaces perform an important environmental and social role.

10.64 They support biodiversity; help to tackle the climate emergency; and provide a variety of areas in which to relax, socialise, connect, play, enjoy sport and take part in physical exercise. This benefits health and well-being, and reduces feelings of social isolation.

10.65 The term "public open space" in this section refers to open space that can be used and enjoyed by all the community. It is distinct from privately accessible open space such as private or communal gardens or balconies that do not ordinarily provide access for everyone. Public open space includes, but is not limited to:

- Metropolitan Open Land, including Hampstead Heath and adjoining areas, Regent's Park, Primrose Hill/Barrow Hill Reservoir, and Highgate Cemetery/Waterlow Park/Fairseat;
- green amenity spaces, such as formal or informal parks, squares, gardens or other landscaped areas, which could include areas of natural or semi-natural green spaces;
- active spaces, such as areas of grassed or artificial surfaces providing opportunities for sport and recreation;
- civic spaces;
- housing estate amenity areas;
- formal and informal areas of play;
- natural and semi-natural spaces, including areas formally recognised for their nature conservation value;
- historic cemeteries, churchyards and other burial spaces; and
- waterways, including the Regents Canal.

10.66 There are over 290 public and private spaces designated on the Local Plan Policies Map. Policy SC4 sets out the Council's strategy for protecting existing and supporting the provision of new open spaces.

Policy SC4
Open Space

A. The Council will protect, enhance and improve access to Camden's public open spaces, to promote health and well-being, enhance biodiversity and make space for nature within Camden.

Protection of open spaces

B. To protect Camden's open spaces the Council will:

1. protect all designated public and private open spaces shown on the Policies Map and in the accompanying schedule, unless:
    a. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
    b. an assessment has been undertaken which has clearly shown the open space or land to be surplus to requirements; or
    c. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
2. safeguard amenity space on housing estates while allowing flexibility for the re-configuration of land uses. When assessing development proposals, we will take the following into account:
    a. the effect of the proposed scheme on the size, siting and form of existing amenity space and the functions it performs;
    b. whether the amenity space is replaced by equivalent or better provision in terms of quantity, quality and accessibility for residents; and
    c. whether the public value of retaining the amenity space is outweighed by the benefits of the development for existing estate residents and the wider community, such as improvements to the quality and access of the amenity space.
3. resist development that would be detrimental to the setting, use and enjoyment of designated open spaces;
4. exceptionally, and where it meets a demonstrable need, consider small-scale development on open space, which is associated with the use of the land as open space and contributes to its use and enjoyment by the public; and
5. conserve and enhance the heritage value of designated open spaces and other elements of open space that make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets.

Policy SC4
Open Space

Provision of new and enhanced public open space

C. To secure new and enhanced public open space and ensure that development does not put unacceptable pressure on the borough's network of public open spaces, the Council will:

1. require developments that meet the thresholds set out in Table 11, to contribute to the provision of public open space in accordance with the following standards:
    a. Residential (all types) - 9 sqm per occupier;
    b. Commercial development and higher education - 0.74 sqm per worker;
    c. Student accommodation - 9 sqm per single room and 18 sqm per double room, multiplied by a factor of 0.75;

2. give priority to securing new public open space on-site. Provision off-site, near to the development, will only be considered acceptable where it can be demonstrated to the Council's satisfaction that provision on-site is not achievable;

3. seek developer contributions to deliver improvements to existing public open space using Section 106 agreements where an applicant can demonstrate to the Council's satisfaction that it is not feasible to provide public open space on-site or off-site, in accordance with criteria C2. We will secure planning obligations to address the additional impact of proposed schemes on public open space taking into account the scale of the proposal, the number of future occupants and the land uses involved;

4. ensure developments seek opportunities for providing private amenity space;

5. give priority to play facilities and the provision of amenity space which meets residents' needs where a development creates a need for different types of open space;

6. tackle deficiencies in public open space through enhancement measures; and

7. seek temporary provision of public open space where opportunities arise.

Policy SC4
Open Space

Design and management of public open space

D. To ensure that new or enhanced public open space is designed and managed to a high standard the Council will:

1. ensure that all new or enhanced public open space is designed, where appropriate, to:
    a. support health and well-being and be safe, welcoming, inclusive and accessible for all;
    b. be multi-functional;
    c. connect to and integrate with the wider green infrastructure network and townscape/landscape, to increase access for people, promote habitat connectivity and support species migration;
    d. be adaptable to, and mitigate the impacts of, climate change particularly in relation to addressing overheating and managing flood risk in accordance with Policy CC8 (Overheating and Cooling) and Policy CC10 (Flood Risk);
    e. support native and priority species;
    f. provide opportunities for physical activity and play;
    g. provide free, publicly accessible toilets suitable for a range of users; and
    h. provide opportunities for community food growing in accordance with Policy SC5 (Food Growing);

2. require developments that provide public open space to make provision for its long-term management and maintenance, and be managed in accordance with the principles set out in the Mayor's Public London Charter; and

3. require major applications that include public open space to be accompanied by a detailed landscaping scheme and landscape management plan.

Protection of public and private open space, outdoor sports facilities and amenity land on housing estates

10.67 It is important that the Council protects the public and private open spaces designated on the Local Plan Policies Map, as well as areas of amenity land on housing estates with the potential to be used as public open space. They are a limited resource and highly valued by the community. Camden's open space designations include outdoor sports provision, including playing fields and ancillary facilities, which the Council will seek to protect, maintain and enhance. The loss of an open space will only be acceptable where the tests set out in Policy SC4 (Open Space) are met.

10.68 Camden has many large housing estates with extensive areas of amenity land. These areas have generally not been formally designated as open space but constitute a potential resource for providing enhanced public or communal open space. The Council wishes to protect this land, while allowing for the reconfiguration of open space and other land uses across estates where significant public benefits have been demonstrated (for example, the provision of new homes, schools and other community benefits), in particular for residents of the estate. The Council will consider whether such schemes provide equivalent or better provision in terms of the quality and quantity of usable open space and secure improvements to the accessibility and range of uses. This can bring enhancements where land set within housing estates is of poor quality, badly arranged or offers limited value in terms of open space functions for which it can used.

10.69 The success and viability of open spaces is closely linked to the scale, character and quality of the adjacent townscape and development. We will resist proposals which would affect the use and enjoyment of an open space through detrimental changes to its setting. This includes changes to the space's appearance or character, its microclimate, levels of external light or noise pollution, overshadowing, overlooking, and disruption to views in or out of the space.

10.70 When assessing proposals that would involve the loss of open space, it must be demonstrated to the Council's satisfaction that there is an exceptional need for the development and that it is associated with the use of the land as open space. Any development should be of the minimum size necessary to address the identified need. We will resist proposals which would be detrimental to the setting, public's use and enjoyment of the open space. The Council will seek replacement provision elsewhere to compensate for the loss.

10.71 Extensions and alterations to existing buildings on open space should be proportionate to the size and volume of the original building. Proposals seeking the change of use of an existing building should also be sensitive to the role and function performed by the open space. The poor quality of an open space will generally not be accepted as a reason for its partial development to fund improvements as, once built on, the open space is lost to the community for ever.

Open spaces with historic value

10.72 Many of the borough's designated open spaces are located within conservation areas or are designated as heritage assets. This includes 'London Squares', which are protected for their leisure and recreational value by the London Squares Preservation Act 1931, and non-designated heritage assets identified on the Council's 'Local List' or through neighbourhood plans. Furthermore, 14 of the borough's open spaces are Parks and Gardens of Special Historic Interest – significant designed landscapes registered by Historic England.

10.73 Open spaces can positively contribute to a conservation area's character and the setting of heritage assets. The Council will have regard to conservation area appraisals and management plans, the National Heritage List for England, the Greater London Historic Environment Record and other appropriate sources when establishing the contribution made by open spaces to the historic environment.

10.74 The Council will encourage the management of registered parks and gardens and London Squares to maintain and, where appropriate, enhance their value and protect their setting. The Council will consult with Historic England over proposals affecting these parks and gardens. The Council will also encourage the restoration of registered parks and gardens and London Squares to enhance their value, where appropriate.

New and enhanced open space

10.75 Development in the borough will lead to increased use and pressure on our existing open spaces. The Local Plan therefore seeks to secure sufficient open space with the capacity to meet the additional demand arising from new development (including changes of use). The Council will seek on-site provision of open space from new developments wherever possible.

10.76 Developments will be required to contribute to the provision of public open space in accordance with the standards set out in Table 11.

10.77 Where it is demonstrated to the Council's satisfaction that on-site provision is not possible, the Council will seek other forms of open space contribution, giving preference to off-site provision capable of meeting the needs generated by the development. This includes securing public access to existing open spaces, such as land around housing estates and large private spaces. The Council will seek Section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing open spaces is met. Where the Council negotiates a planning obligation, we will apply the standards set out in criterion C1 in Policy SC4 (Open Space).

10.78 Where new open space is provided, it should take into account the characteristics of the site and the local context. This includes existing street patterns and pedestrian routes. The open space should be easy to use by people of all ages. It should also consider the particular barriers that can be experienced by people with physical and sensory impairments in accordance with Policy SC2 (Access for All) and must be safe and secure for everyone in accordance with Policy A2 (Safety and Security). An important consideration will be the long-term ability for a space, including landscaping, planting, street furniture and surfaces, to be managed effectively and for demands on natural resources to be minimised where relevant.

10.79 In densely developed areas, when it is not possible to provide open space on site, we will consider use of a financial contribution to create usable spaces within the public realm, for example through the widening of pavements or creation of pocket parks, as this can be an effective means of achieving a range of environmental and quality of life benefits. These measures may also contribute to the implementation of conservation area management plans, for example, the installation of sympathetic lighting or restoration of pavement materials.

10.80 Provision for outdoor sports facilities, including playing fields, will also be sought within the overall requirement of 9sqm per residential occupier where an opportunity for provision arises. Where a development provides public facilities for outdoor sports this can contribute to the 9sqm standard, subject to a balanced mix of public open space being provided.

10.81 Where a development generates a need, the Council will give priority to securing suitable provision of play space for children and young people and an appropriate level of amenity space for the occupiers of a development. Play space provision will be expected to comply with the London Plan standards and designed to be welcoming, safe, accessible and inclusive for a range of ages and needs, in particular disabled and neurodiverse users.

10.82 Camden Planning Guidance on open space provides further detail on how financial contributions for open space provision will be calculated for individual schemes. It also sets out our expectations in relation to the maintenance of open spaces. Developers will be expected to have due regard to this.

Table 11 | Open Space Standards

Development type	Threshold	Public open space provision
Residential (all types)	11 or more additional dwellings or exceeds 1,000 sqm (gross internal area).	9 sqm per occupier
Commercial development	Developments of over 1,000 sqm of floorspace/or on a site with an area greater than 1 hectare that are likely to increase the working population of the borough. This will be applied to any employment use which falls within Use Classes E(c), E(g), B2 and B8.	0.74 sqm per worker
Higher Education	Developments of over 1,000 sqm of floorspace/or on a site with an area greater than 1 hectare of floorspace for Higher Education institutions will be treated on a case-by-case basis. There will be a presumption that these developments make a contribution towards the needs they generate.	0.74 sqm per worker
Student accommodation	Student housing schemes creating an additional 11 or more units/rooms or occupiers	9 sqm per single room and 18 sqm per double room, multiplied by a factor of 0.75

Temporary provision of open space

10.83 Sites awaiting development can sometimes make short term contributions to open space provision. We will strongly support the temporary use of cleared sites for public open space during the construction period where this can meet local needs. Such sites also provide a potential location for local food growing projects (see Policy SC5 (Food Growing) below).

Design and management of public open space

10.84 Where a development creates new or enhanced public open space, the Council will expect this to be designed and managed in accordance with Policy SC4 (Open Space), having regard to other policies in the Plan including Policy D1 (Achieving Design Excellence), Policy SC2 (Access for All), Policy SC3 (Social and Community Infrastructure); Policy A2 (Safety and Security), Policy NE1 (Natural Environment), Policy NE3 (Trees), Policy NE2 (Biodiversity) and Policy SC5 (Food Growing).

10.85 Where developments provide public open space on the site, applicants will be expected to demonstrate to the Council how the proposed scheme will be managed to meet the requirements of the Mayor's Public London Charter, through the submission of a management plan. A commitment to implement the requirements of the Charter's principles, and the agreed management plan, will be secured through a Section 106 agreement. Camden's Public Open Space CPG and London Plan Guidance on the Public London Charter set out further guidance on what details would be expected to be set out in a management plan and developers will be expected to have due regard to this.

10.86 All major applications that include public open space must be accompanied by a detailed scheme for landscaping, which should include proposals for long-term maintenance and landscape management, which will be secured by a condition attached to the planning permission and/or by legal agreement.

Food growing

10.87 Domestic and community food growing has many benefits, including improving the sustainability of food production, increasing access to healthier food, providing opportunities for healthy outdoor activity and enhancing Camden's network of green spaces.

10.88 Food growing can also enable socialisation and the learning of new skills, having a positive impact on the health and well-being of residents. Encouraging and enabling more residents to grow food is an integral component of the Council's food mission, which aims to ensure that everyone in Camden eats well every day with nutritious, affordable and sustainable food.

Policy SC5
Food Growing

A. The Council will support food growing and community food growing in Camden to ensure that residents have access to nutritious, affordable and sustainable food. The Council will:

1. protect existing allotments and community gardens for food growing;

2. seek to secure the on-site provision of suitable space for food growing by residents as part of all major housing developments and mixed use developments incorporating housing. Where provision cannot be made on-site, a financial contribution will be sought to deliver off-site community food growing projects;

3. encourage commercial developments to include provision for local food growing;

4. support the use of incidental open space on housing estates and other open space areas for community food growing, where this does not conflict with other policy objectives or land use priorities;

5. support the temporary use of vacant or under-utilised sites in the borough for community gardening and food growing projects where this does not conflict with other policy objectives or land use priorities; and

6. encourage developments to include landscaping that includes plants and trees that produce fruit, nuts or seeds.

10.89 Housing developments and mixed use developments incorporating housing should seek to create and include flexible space that is suitable for food growing. This will be sought as part of the overall open space requirement generated by a development, in accordance with Policy SC4 (Open Space). The inclusion of food growing opportunities in new developments should extend beyond the conventional provision of gardens and allotments to include the creative use of roofs, walls and balconies where external space is limited; the provision of community gardens; and landscaping that includes plants and trees that produce fruit, nuts or seeds, rather than ornamental trees and shrubs. Where provision cannot be made on site, a financial contribution will be sought to deliver off-site community food growing projects. Furthermore, where applicable, the Council will also encourage commercial developments to include provision for local food growing, for example through the use of basements or roof spaces for urban farms.

10.90 Wherever food growing space is included in a development, consideration should be given to issues such as exposure to the elements; drainage; soil quality, contamination and depth; solar orientation and overshadowing; water supply and the appropriateness of species planted to ensure suitable conditions are present for its meaningful use by residents.

10.91 In some cases initiatives such as the use of incidental open space on housing estates for food growing may not require planning permission. This would depend on its scale and form, and the extent to which it would change the character and function of the open space. The acceptability of such proposals would also depend on the impact on the availability of open space for general amenity use by residents.

10.92 Green roofs can provide opportunities for food growing, if structurally suitable, and can accommodate both growing beds and greenhouses. Local food growing spaces should incorporate sustainable landscape principles and practices, including effective water management, efficient energy use and use of sustainable materials.

10.93 Where provided, the identified space for food growing will be secured through a planning condition or section 106 Agreement.

Cultural facilities

10.94 Cultural facilities, such as museums, libraries, theatres, galleries, cinemas, live music, nightclubs, comedy, and dance venues contribute enormously to Camden's attractiveness as a place to live, visit, work and study.

10.95 They can have significant value for education and learning, and many of these facilities are linked to the wider development of Camden's large sector of creative industries or contribute to the borough's evening and night time economy. The presence of a strong and diverse cultural offer is a draw for investment from businesses and organisations seeking a location in a dynamic and creative environment. They also contribute to the quality of life of residents, and some facilities are significant draws for visitors and tourists. Indirectly, they create wider economic benefits for hospitality and retail uses.

10.96 The opportunities for people of all ages to enjoy and participate in cultural activities can have a significant bearing on their ability to fulfil their individual and collective creative potential and provide connection with others. They are also important in terms of developing a sense of belonging, pride in place and the representation of local cultures. For some residents, these facilities provide a pathway into employment and a long-term career.

10.97 Cultural facilities in Camden are clustered in both the West End and Camden Town. The area of 'Theatreland' in Camden includes cinemas, theatres and night-time venues. Camden Town has long had a vibrant evening and night-time economy, particularly live music, with iconic venues including The Roundhouse, Koko and The Jazz Cafe. Significant cultural venues beyond central London and Camden Town include Kingsgate workspace, Camden Arts Centre, JW3, Hampstead Theatre, The Forum and the Scala. Examples of smaller spaces are The Horse Hospital in Bloomsbury, The Camden People's Theatre and Akademi. Camden's cultural offer includes a wealth of original, experimental and alternative programming, providing representation for diverse voices and narratives.

10.98 Policy SC6 sets out the Council's planning policy approach to supporting cultural facilities in Camden.

Policy SC6
Cultural Facilities

Protecting cultural facilities

A. The Council will protect existing cultural facilities and manage the impact of adjoining uses, applying the Agent of Change principle.

B. The Council will resist the loss of existing cultural facilities unless:

1. it can be demonstrated to the Council's satisfaction that there is no longer a demand for the facility. The Council will expect the applicant to undertake a marketing exercise for at least 12 months to demonstrate that there has been a comprehensive search for alternative cultural and leisure uses for the site; and
2. replacement facilities of at least equivalent quality are provided on-site, or within the vicinity, which meet the needs of Camden's communities; or
3. the use can be delivered from other facilities without leading to or increasing any shortfall in provision and it has been demonstrated that there is no demand for another similar use on the site; or
4. it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose, i.e. another cultural use, in the foreseeable future.

New cultural provision

C. New and expanded cultural facilities will be supported in accordance with the following approach:

1. Large-scale facilities should be located in the Central Activities Zone or Camden Town provided any impact on amenity is mitigated in accordance with Policy A1 (Protecting Amenity).
2. Smaller facilities would be appropriate anywhere in the borough provided they do not have an adverse impact on their neighbours, the surrounding area or the local community. This includes demonstrating to the Council's satisfaction that any impacts on the highways network or public transport would be acceptable.
3. New and expanded cultural facilities should seek to reflect Camden's history, culture and diversity.

D. Where a proposal includes a new or relocated cultural facility, or additional floorspace, the Council will require the applicant to provide the following:

1. an assessment of potential impacts on the continuing operation of existing cultural facilities nearby;
2. evidence demonstrating how the proposal contributes to the delivery of local arts and cultural strategies; and
3. details of shared use / daytime use of the facility by other cultural or community organisations, including on a temporary / 'meanwhile' basis.

Cultural and arts projects

E. The Council will secure section 106 contributions to help fund place based cultural and arts projects linked to the regeneration of centres and estates, in appropriate circumstances.

Protecting cultural facilities

10.99 Cultural facilities are vitally important for their social and economic roles and contribution towards making Camden an attractive and vibrant place to live. However, because of differences in land values, they can be placed under pressure for conversion to other land uses, despite continued demand for the existing cultural use. The adopted Camden Evening and Night-Time Strategy highlights the significant numbers of music venues that have permanently closed in London and the disproportionate impacts this can have on certain communities (e.g. LGBTQ+). The Strategy also identifies the importance of providing a welcoming, inclusive and safe environment for all with cultural facilities helping to deliver more family-friendly, affordable and non-alcohol based experiences. We will therefore seek to retain existing cultural facilities unless there is evidence that can demonstrate to the Council's satisfaction that there is no prospect of the space supporting a cultural use.

10.100 Where proposals would involve the loss of a cultural facility, we will expect the applicant to demonstrate to the Council's satisfaction that there had been a search for alternative cultural uses for the site through a marketing exercise. The marketing exercise should be undertaken over a period of not less than 12 months and be based on a realistic price or rent which is supported by the Council. Further information on this is set out in Camden Planning Guidance on Community Uses, Leisure Facilities and Pubs and developers will be expected to have due regard to this.

10.101 We will also seek to protect supporting facilities where they are linked to the successful operation of venues, for example small studios, rehearsal rooms or equipment stores.

10.102 Exceptionally, there may be justification for relocating a facility to an alternative location in the borough. Where this is proposed, the Council will request evidence showing how this would impact on users of the facility. It is recognised that the long-term use of premises for specific cultural uses can underpin the significance of heritage assets. Where this applies, the retention of the existing cultural use at its current premises will be the Council's preferred option. Where proposals impact on existing cultural uses, the Council will ensure that their function and role is not diminished or put at risk by any of the proposed changes.

New cultural provision

10.103 New provision will be supported according to the scale and impact of the scheme. Large facilities (2,500 sqm or more) should be provided in suitable locations in the CAZ where there are existing concentrations of evening and night-time uses or in Camden Town. Smaller facilities may be appropriate anywhere subject to the impacts on neighbouring uses being shown to be acceptable. The Council will resist proposals for new or enhanced cultural facilities where they give rise to significant impacts on residential amenity, in accordance with Policy A1 (Protecting Amenity). New and expanded facilities should have regard to the vision and objectives set out in the Camden Evening and Night-time Strategy.

Cultural and arts projects

10.104 Traditionally, public art contributions have been secured for permanent art works to add to an area's distinctive character, to create visual interest and commemorate people and events. This remains a relevant and legitimate use of developer contributions and contributions will continue to be sought through applying the Local Plan's policies on design (see D1 (Achieving Design Excellence). Increasingly however, cultural and arts projects are being used to support wider town centre renewal and estate regeneration. These projects involve local artists and arts and cultural providers, and can cover multiple sites in an area. They can also be delivered through partnerships with schools and organisations working with young adults, and elderly or disabled people. Given the multiple benefits for communities of being involved in these projects, including learning and skills opportunities, direct participation and the impact on well-being, the Council may seek section 106 contributions in relevant circumstances towards the delivery of cultural and arts projects in Camden's communities.

Public houses

10.105 Public houses (pubs) play an important community and cultural role. As places where members of the community meet and gather, they support social well-being and strengthen community cohesion.

10.106 They sometimes provide important community meeting space and host local meetings, events and entertainment. Some pubs also support Camden's social diversity by providing a valuable support function for vulnerable or easier to ignore groups.

10.107 In some areas, the community pub provides a hub for socialising with friends, making new contacts, exchanging ideas, celebrating important occasions and staging large gatherings including live music, theatre and comedy nights. Some of the most interesting and unique pubs attract customers from a wide catchment area and may be important to a protected group defined under the Equality Act 2010 or in terms of their tourism value.

10.108 Many pubs contribute to local culture and identity, and this is often closely related to a pub's long-standing presence in the street scene. The closure of a pub can lead to the loss of an area's vibrancy as well as harming its diversity and interest. Some pubs are important because they are heritage assets and architecturally distinguished.

10.109 Pubs also have an important economic function in contributing to the vitality of town or neighbourhood centres. Pubs support local employment and entrepreneurship, provide valuable work experience for young people, and support jobs in the wider economy through their supply chain.

10.110 National planning policy recognises that public houses, along with other community facilities, enhance the sustainability of local communities and should be safeguarded and retained for the benefit of the community while allowing them to develop and modernise in a sustainable way. They are a 'sui generis' use meaning they are not in any planning use class and a planning application is needed for changes from a pub to any other use (for example to shops or residential).

Policy SC7
Public Houses

A. The Council will seek to protect public houses which are of community, heritage or townscape value.

B. The Council will not grant planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless it is demonstrated to the Council's satisfaction that:

1. the proposal would not result in the loss of a pub which is valued by the community (including protected groups) unless there are equivalent premises available capable of meeting the community needs served by the public house; or

2. there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term.

C. Where a public house is converted to an alternative use, the Council will seek the retention of significant features of historic or character value.

D. Applications involving the loss of pub floorspace, including facilities ancillary to the operation of the public house, will be resisted where this will adversely affect the operation of the public house.

E. Where it has been demonstrated to the Council's satisfaction that a public house can no longer be retained, the suitability of the premises for alternative community uses for which there is a defined need in the locality should be assessed before other uses are considered. If the pub is a heritage asset, it should be conserved in a manner appropriate to its heritage significance.

F. Where new public houses are proposed, these should be located on appropriate sites in the Central Activities Zone and in the borough's town centres, subject to the requirements of other policies in this Plan.

Protection of valued pubs

10.111 Policy SC7 (Public Houses) allows flexibility by supporting development where it would not be contrary to the interests of the economy, historic environment or community. The overall aim is to ensure that the Council is able to protect all of its public houses which provide a significant benefit or value to the local community, including access to a range of facilities; that public houses of historic and cultural value are conserved and enhanced according to their significance; and that the vibrancy and vitality of Camden's centres and local economies are sustained.

10.112 The Council will determine whether a proposal would result in the loss of a pub with community, cultural or heritage value. A 'community pub' predominantly serves a local residential community or a 'protected group' (for example the Lesbian, Gay, Bisexual and Transgender communities) which may have a catchment wider than the local area. There may be a justification for protecting a pub which does not meet this criterion if it is the last facility capable of meeting the local community's needs and could conceivably do so in the medium term.

10.113 It is important that the local community have a say in whether pubs are protected. The Council may require an applicant to fund a survey to establish the views of the community, including members of protected groups where appropriate, on the loss of the public house. The methodology and content of the survey would need to be agreed in writing by the Council and be funded by the applicant. If a pub is registered as an Asset of Community Value, a survey will not be required to demonstrate to the Council the community value of a pub, as that has already been established by that designation.

10.114 Where the proposed development would result in the loss of a valued pub, the Council will require evidence setting out alternative public house provision in the local area or for the community, including information on the location, size, range and quality of facilities, taking account of any unimplemented planning permissions for the addition or loss of public houses. The availability of alternative premises will only be considered where they meet equivalent needs of the community, such as performance spaces, meeting rooms or a beer garden. The loss of a pub cannot be overcome by the availability of other public houses if it leads to the loss of pub facilities or services of particular value to the community.

10.115 The Council will also require applicants to fund a marketing exercise to demonstrate whether there is a demand for the pub at a realistic rent or freehold value which is 'free of tie'. The Council will expect a mounted sales/letting board to be provided throughout the marketing period to draw the community's attention to the marketing exercise. At the applicant's expense, the Council will require a qualified licensed leisure chartered surveyor independent of the selling agent to confirm that the rental and freehold value of the pub used in the marketing exercise is reasonable.

10.116 The Council will require applicants to demonstrate to the Council's satisfaction there is no reasonable prospect of a pub being able to trade from the existing premises in the medium term. We will require details including rents, turnover figures and other factors relevant to a pub's viability including the style of operation, hours of opening, supply of food and availability of meeting and event rooms. Applicants should set out what operating models have been used to help sustain or improve the pub's potential. Further details about the marketing exercise and viability assessment for pubs are set out in Camden Planning Guidance on Community uses, leisure and pubs and developers will be expected to have due regard to this.

10.117 Many pubs are valued for their architectural interest, historic fabric and contribution to the character and townscape value of the local area, for example through their distinctive signage, windows or fittings. They can also support local arts and culture providing low-cost performance space. Pub gardens can be particularly valued for providing communal open space in the built-up area.

10.118 Where the Council is satisfied that it is no longer possible for a public house use to be found for the premises, we will seek the retention of significant features which contribute to the building's character and heritage value.

10.119 A significant number of pubs in Camden have been recognised as Assets of Community Value, which provides the community with an opportunity to raise funds to make a bid to acquire the designated asset.

Partial loss of a public house

10.120 The partial loss of a pub and/or ancillary facilities (for example beer gardens, parking, function rooms and ancillary residential accommodation) may be detrimental to its character, community value or future viability. Outdoor amenity spaces, gardens, cellars and parking areas attached to pubs can be subject to pressures for residential development. These changes can lead to a pub becoming less profitable and as a consequence, more vulnerable to further redevelopment, potentially leading to a pub being lost altogether. In determining whether the loss of floorspace is acceptable, the Council will take into account the effect of changes to the pub's layout and reduction in its trading area on its continuing ability to operate successfully, and consider the effects of such changes in sustaining a viable pub. We will expect landlords / operators to consider suitable complementary uses that enable the continued successful operation of the pub, such as 'bed and breakfast' accommodation.

10.121 In some cases, the introduction of sensitive uses, such as permanent residential accommodation, will be subject to the Agent of Change principle. This means that the Council will expect the applicant to consider how the existing pub operates (for example its licensing terms, the use of outdoor areas etc.) when mitigation measures are being designed. The onus will be on the applicant to ensure that a non-ancillary use does not lead to pressure for the pub to materially alter its operations. The full costs of the mitigation will need to be borne by the applicant.

11

The Natural Environment

11 Chapter

The natural environment

11.1 Recent years have shown the important role that access to open space and nature can play in improving physical and mental health, well-being and happiness.

11.2 There is also greater emphasis now on the role that trees, plants and greenery can play in keeping our air clean, reducing surface water flooding, cooling our neighbourhoods, enhancing biodiversity and helping to tackle the climate and ecological emergency.

11.3 Camden benefits from a rich and diverse natural environment and has a wide range of open spaces including parks, natural or semi-natural green spaces, housing estate amenity areas, playgrounds, historic cemeteries, churchyards, allotments, community gardens, outdoor sports facilities and the Regent's Canal. These spaces, together with street trees, soft landscaping, roof gardens, rain gardens and green/brown roofs and walls form a network of 'green infrastructure' in the borough.

11.4 The Council's biodiversity strategy 'Creating Space for Nature in Camden' sets out our ambitions for protecting and enhancing nature and biodiversity in the borough. It aims to ensure that Camden is a place where nature and wildlife can thrive and where residents, visitors and workers have the opportunity to access and enjoy nature. It is the first part of an ecological plan for the borough, developed in response to the declaration of a climate and ecological emergency by the Council, and will be supported by the establishment of a Local Nature Recovery Network and the development of a Green Infrastructure Strategy.

Policy NE1
The Natural Environment

A. To conserve and enhance Camden's natural environment the Council will:

1. protect and enhance the network of open spaces and local green spaces across the borough in accordance with Policy SC4 (Open Space);
2. give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);
3. designate and protect nature conservation sites (including the Ancient Woodland on Hampstead Heath) and other features of biodiversity value, such as Sites of Importance for Nature Conservation, corridors, stepping-stones and ancient and veteran trees in accordance with NE2 (Biodiversity) and NE3 (Tree Planting and Protection);
4. support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;
5. protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;
6. preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath;
7. work with partners to preserve and enhance the Regent's Canal, including its setting, and improve access to its towpath, while balancing the differing demands on them;
8. expect development to protect and enhance biodiversity in line with Policy NE2 (Biodiversity);
9. protect trees in Camden and seek to secure additional trees in accordance with Policy NE3 (Tree Planting and Protection);
10. seek contributions from any scheme proposing additional housing and all major developments to safeguard and enhance designated wildlife sites and, where appropriate, help facilitate the delivery of green links ('corridors') between them, or improve buffers around sites, to offset the impacts of development and provide opportunities to enjoy nature;
11. encourage the delivery of highways greening measures in accordance with Policy T1 (Safe, Healthy and Sustainable Transport);
12. require multi-functional Sustainable Drainage Systems (SuDs) to be provided to reduce surface water run off as far as possible in accordance with Policy CC11 (Sustainable Drainage);
13. seek to improve opportunities for residents and the public to access and engage with nature, particularly in areas where such opportunities are lacking; and
14. seek contributions from the development of appropriate sites to support the delivery of the Council's priorities and projects for the natural environment, commensurate with the scale and impact.

11.5 Policy NE1 supports the Council's ambitions for creating space for nature in Camden by ensuring that development in Camden conserves and enhances Camden's natural environment, in response to the climate and ecological emergency. This policy should be read in conjunction with Policies SC4 (Open Space); SC5 (Food Growing); NE2 (Biodiversity); NE3 (Tree Planting and Protection); D1 (Achieving Design excellence); CC1 (Responding to Climate Change); CC11 (Sustainable Drainage) and T1 (Safe, Healthy and Sustainable Transport), which together set out the Council's approach to the Natural Environment.

Metropolitan open land and sites of nature conservation importance

11.6 Camden has a number of designated open spaces, which are identified on the Local Plan Policies Map. These open spaces include areas of Metropolitan Open Land (MOL), which is open space of London-wide significance that provides a break in the built-up area. There are four main areas of MOL in Camden, which are of great importance to the borough and its character – Hampstead Heath and adjoining areas, Regent's Park, Primrose Hill/Barrow Hill Reservoir and Highgate Cemetery/Waterlow Park/ Fairseat. We will protect the openness and character of these spaces in accordance with London Plan policy and policy guidance in the National Planning Policy Framework (NPPF) on Green Belts.

11.7 A significant number of open spaces in Camden are also designated for their nature conservation importance. Designated sites of nature conservation interest are shown on the Local Plan Policies Map. Taken together, these sites occupy some 414 hectares of land. They are:

- Hampstead Heath Woods Site of Special Scientific Interest (SSSI), which is Camden's only SSSI. SSSIs are designated by Natural England due to their nationally important habitats and species and/or geological features and must be given the highest protection in accordance with legislation;
- 39 Sites of Importance for Nature Conservation (SINC): As part of the evidence base for the Local Plan, Camden commissioned the London Wildlife Trust to undertake a review of these sites. This resulted in a number of boundary changes and the identification of 3 new SINCs which are reflected on the Policies Map;
- 4 statutorily designated Local Nature Reserves (LNR), which host a rich variety of flora and fauna – Adelaide, Belsize Woods, Westbere Copse (all managed by London Borough of Camden) and Camley Street Natural Park (managed by London Wildlife Trust);
- The Regent's Canal, which passes through the borough. It provides a flyway for bat populations and is therefore sensitive in parts to light pollution.

11.8 Camden's SINCs and LNRs represent some of the most significant concentrations of habitat and species in the borough. They are widely distributed, have varied functions (including rail embankments, London Squares, community gardens and burial grounds) and have an essential role in providing local access to nature. Most SINCs are not in the Council's control and therefore it is difficult for the Council to protect species, habitats and foraging areas which are not formally protected by international and national legislation. We will, however, seek to protect these locally designated nature conservation sites from inappropriate and harmful development. This includes resisting the development of designated sites where the nature conservation value has been diminished or lost through neglect or damage as it is possible for the habitat to be restored.

11.9 This policy, in tandem with Policy SC4 (Open Space) and Policy NE2 (Biodiversity), ensures the safeguarding of these sites.

Local green spaces

11.10 The NPPF introduced the concept of a Local Green Spaces designation. This is green space where development is ruled out other than in very special circumstances. A Local Green Space should be within reasonably close proximity to the community it serves, be demonstrably special to a local community and hold particular local significance, be local in character and not form an extensive tract of land. The Local Plan seeks to protect existing local green spaces, and the Council supports Neighbourhood Forums in identifying further local green spaces through neighbourhood plans. Inappropriate development of designated Local Green Spaces will not be supported except in the very special circumstances set out in national planning policy.

Protection of other undeveloped areas including gardens

11.11 Development within gardens and other undeveloped areas can have a significant impact upon the amenity and character of the local area and may increase local flood and heat risk, particularly in tandem with other developments. The Council will therefore protect such spaces in accordance with the National Planning Policy Framework.

11.12 Gardens help shape their local area, provide a setting for buildings, provide visual interest and often support natural habitats. Therefore, they can be an important element of the character and identity of an area (its 'sense of place') and its biodiversity. Given this, notwithstanding permitted development rights, we will continue to resist development that occupies a disproportionate amount of a garden, and the loss of garden space which contributes to the character of the townscape.

11.13 The impact of development on gardens, especially biodiversity and drainage, can be reduced through having fewer or smaller garden structures, the use of lightweight building materials and by retaining areas of topsoil. Some neighbourhood plans in Camden have also identified existing and proposed wildlife corridors that cross gardens, which those plans seek to protect and enhance.

11.14 Part of the established character of garden spaces may also be defined through features such as railings and garden walls. We will generally seek the retention of these features where they make a positive contribution to townscape value, recognising however that solid walls and fences can act as a barrier for some species, such as hedgehogs. We will also support the reinstatement of permeable garden borders, such as hedges, where this helps the movement of species (see Policy NE2 (Biodiversity).

11.15 Wider Local Plan policies relating to car free development (Policy T5 (Parking and Car-free Development) and the retention of permeable surfaces (Policy CC11 (Sustainable Drainage) are likely to also bring benefits for biodiversity through the retention of soft landscaping and planting.

11.16 Furthermore, to enhance the amenity of residents and occupants we will also seek the retention of important views and glimpses of green space where these have been identified in a conservation area appraisal or development plan document (particularly where schemes are unable to meet the requirement to provide public open space on-site). Spaces above rooflines, gaps between buildings, and even small, sometimes isolated pockets of amenity space, can be vital in supporting openness, providing visual interest, softening the built environment and contributing to well-being. These views may also help to define the significance of heritage assets.

Key open spaces in Camden

11.17 Hampstead Heath is the largest open space in the borough, providing nearly half of Camden's total area of open space and many of its outdoor sporting facilities. The Council will work with partners, including the City of London (who own and manage the Heath), to ensure it is properly safeguarded. There are numerous large private gardens adjacent to the Heath that are designated as open space. We will continue using guidance in conservation area appraisals and management strategies to preserve and enhance the built environment around the Heath and preserve outlooks and views from it. This includes protected views from Kenwood House and Parliament Hill to St. Paul's and from Parliament Hill to the Palace of Westminster.

11.18 The Regent's Canal is Camden's only significant open watercourse and winds through the borough from Regent's Park to King's Cross. The Canal is designated as a site of metropolitan importance for nature conservation and is also an important historical feature. Development near the Canal will therefore be expected to reflect its unique character. When assessing applications for sites along and adjacent to the Canal we will take into account the Regent's Canal Conservation Area Appraisal and Management Strategy.

11.19 We will also work with partners to enhance the Canal and balance the differing demands on the Canal and its towpath. Key considerations here are improving the accessibility of the Canal and also improving biodiversity along the Canal through planting and the provision of green or brown roofs and green walls. Other issues relevant to development proposals in proximity of the Canal include the increasing demands on the towpath by pedestrians and cyclists, the potential for crime and anti-social behaviour due to the Canal's relative isolation, and the importance of retaining dark, unlit land in sustaining habitats and species, particularly the foraging of bats.

11.20 Where developments are proposed in proximity to the Regent's Canal, the Canal and River Trust should be consulted at an early stage in the planning application process.

Increasing opportunities to experience nature

11.21 A key objective of the Council's Biodiversity Strategy is to increase engagement with nature. There are typically lower levels of active engagement in more deprived areas of the borough. This is partly related to the limited amount of natural habitat in these locations, where nature conservation sites are generally quite small, with parts of the west, east and south of the borough having the lowest coverage. In some cases, access to nature conservation sites is restricted in order to safeguard their nature conservation interest.

11.22 Of particular social benefit to the borough are Local Nature Reserves. They support a variety of learning and community-based activity, and it is important to protect and maximise their value. By raising awareness of our links to, and dependence on, the environment, these sites can foster an interest in the stewardship of natural habitats.

Enhancing our natural environment

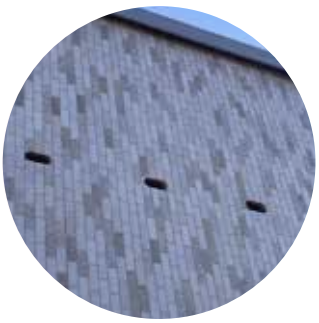
11.23 Development schemes will be expected to contribute to the delivery of local green infrastructure projects, to enhance the borough's natural environment, commensurate with their scale and impact. This includes enhancements to existing and the provision of new green infrastructure, in accordance with the policies in the Plan, particularly those relating to open space, biodiversity, trees, highways and design. The Local Plan also supports initiatives for the greening of the public realm to create safer, healthier, more attractive environments for residents, workers and visitors.

11.24 As part of this, the Council will look to secure contributions to enhance links between open spaces, including wildlife sites, in the borough, to improve access for recreation where this is consistent with conservation objectives, to allow species to move between habitats.

11.25 Key strategic green links proposed in Camden include the Camden Nature Corridor in Kentish Town, the Camden Green Network, which seeks to connect green spaces across the borough, and the Camden Highline which is intended to run from King's Cross to Camden Town. Further information on these proposals, and other green infrastructure projects, is set out in the Council's Infrastructure Delivery Plan and will be identified in emerging documents relating to Camden's Green Infrastructure and Nature Recovery networks. The Council will secure planning obligations from schemes, where appropriate, to help facilitate the delivery of green links or provide or improve buffers around sites. 'Linking' green infrastructure such as corridors can help to improve the function of designated sites. There are also opportunities to repair and improve SINCs to enhance their biodiversity and where they are open to the public, ensure that the impacts of additional visits are not detrimental to a site's ecology.

11.26 To support the objectives set out in the Biodiversity Strategy, the Council has adopted a Tree Planting Strategy and as mentioned, is in the process of preparing a Local Nature Recovery Strategy and Green Infrastructure Strategy. These documents will set out key priorities for the borough and include projects to help deliver these. Development in Camden will be expected to support the delivery of these strategies once they are adopted.

11.27 Further guidance on the provision of open space and trees is set out in the Council's Camden Planning Guidance and developers will be expected to have due regard to this.



Biodiversity

11.28 Nature provides us with a variety of environmental, social, cultural, educational, health and recreational benefits.

11.29 However, in recent times it has become increasingly apparent that biodiversity in the UK is declining. Given this, the Council declared an ecological and climate emergency in 2019 with the aim of protecting and supporting habitats and species in Camden to reverse their decline.

11.30 The Environment Act 2021 introduced a requirement for developments to deliver a minimum 10% biodiversity net gain above the ecological baseline for an application site. In Camden, roof gardens, green and blue roofs and sustainable drainage systems will in many cases have particular potential for delivering net gains in biodiversity on site, while offering additional benefits for residents such as cooling and flood risk reduction. Further information on the Council's requirements for addressing drainage as part of the development is set out in Policy CC11 (Sustainable Drainage).

11.31 The Environment Act also introduced Local Nature Recovery Strategies which will guide the delivery of biodiversity net gain projects. The Council's emerging Nature Recovery Network (a network of designated and non-designated wildlife sites and corridors for wildlife) and Neighbourhood Plans map the opportunities where routes for wildlife can be improved, or buffers provided, for designated sites through extending biodiverse planting and landscaping. Strengthening corridors reduces the risk of the borough's designated sites for biodiversity becoming isolated and deteriorating over time.

11.32 The implementation of these initiatives will contribute towards the delivery of net gains in biodiversity, so that the natural environment across Camden is improved by the end of the Local Plan period. Financial contributions sought under Policy SC4 (Open Space) will also be used to contribute towards new planting and measures to support wildlife.

Policy NE2
Biodiversity

A. The Council will seek to ensure that development protects and enhances nature conservation and biodiversity in the borough. The Council will:

1. require all major schemes, and those that have the potential to adversely impact biodiversity and designated sites, to prepare a baseline ecological assessment (Biodiversity survey and report). This should demonstrate how any adverse impacts on biodiversity can be avoided or mitigated and establish how biodiversity enhancements will be maximised. Mitigation measures should be delivered on-site unless it can be demonstrated to the Council's satisfaction that this is not achievable;

2. consider any potential adverse impacts of a development on habitats and species from factors such as shading, light pollution and risk of disturbance. Applicants will be expected to follow the mitigation hierarchy with regards to the management of such impacts (avoiding where possible; where this is not feasible, seeking to mitigate the impact; and only where avoidance and mitigation are not possible, seeking compensation for the loss/harm);

3. resist development where it is likely to worsen deficiencies in access to natural greenspace;

4. expect development to realise benefits for biodiversity through their layout, design and use of materials, taking into account the local ecological context and any opportunities for biodiversity gains identified in Local Plan site allocations and neighbourhood plans, including the provision of green roofs;

5. expect suitable developments to integrate measures to support wildlife, including swift bricks, bat/bird boxes, bee bricks and permeable fencing;

6. require a biodiversity net gain of at least 10% on eligible sites, with preference given for on-site or near site solutions. The net gains will be secured for a period of at least 30 years;

7. recognise the biodiversity value offered by gardens and soft landscaping, in contributing to wildlife corridors and providing a 'stepping stone' between designated nature conservation sites, avoiding detrimental impacts on the function of an existing/emerging corridor; and

8. secure long-term management plans and monitoring of schemes, where appropriate, to ensure that nature conservation objectives are met. We will also expect Construction Management Plans to provide information on how habitats will be protected during building work, where appropriate.

11.33 Under the provisions of the Environment Act 2021, local authorities have the duty to conserve and enhance biodiversity and report on actions taken. The Council's Biodiversity Strategy sets out our ambitions for protecting and enhancing nature and biodiversity in the borough and the Local Plan provides the framework through which the Council can deliver this.

Habitats and species

11.34 Camden's green spaces and built environment support habitats and species protected under UK and international legislation, the presence of which is a material planning consideration. Priority habitats and species are those most threatened and in need of conservation action in the UK and will be afforded protection when assessing planning applications.

11.35 There are also Sites of Importance for Nature Conservation in Camden which are graded into four categories according to their spatial significance and quality. The Council has undertaken a review of the role and function of designated SINCs in the borough (Review of Sites of Nature Conservation, London Wildlife Trust, 2024) which found that the vast majority of Camden's SINCs continue to meet the criteria for which they were originally designated.

11.36 Additionally, we have designated Local Nature Reserves providing opportunities for communities to access and engage with nature and wildlife corridors of various scales. Areas of non-designated habitat may also be important in providing space for wildlife to shelter, find food and move through the landscape.

Protecting biodiversity

11.37 The Council will require all major schemes, and those that have the potential to impact biodiversity and designated sites, to prepare a baseline ecological assessment, which should establish the site's ecological characteristics, assess the proposal's impacts on existing trees, shrubs and vegetation and identify opportunities for mitigation and enhancement. As part of this, consideration should be given to the presence of habitats and species in proximity to the site and whether the site has a 'buffering' role (that is, managing disturbance from human activity on an identified habitat). The Council will expect developments to demonstrate how habitats providing multiple functions (for example, flower-rich grassland in public open space) can be maintained in a way that optimises their environmental benefits. Survey findings should be shared in an appropriate format with Greenspace Information for Greater London (GIGL), London's environmental records centre. Further guidance on ecological assessments, including the level and scope of detail required, and the times in which they should be carried out, is set out in Camden Planning Guidance on Biodiversity and developers will be expected to have due regard to this.

11.38 Where development is proposed that will indirectly impact on biodiversity through noise, light, shading, inappropriate planting and increased human presence, the Council will require developers to demonstrate how any adverse impacts on biodiversity can be avoided or mitigated. External lighting provided in the grounds of domestic properties solely for a design benefit (for example uplighters in trees) should generally be avoided and an appropriate colour temperature used for the location. Schemes will also be resisted where there would be a detrimental impact on the local community's ability to enjoy access to nature. Lighting should be sensitive to the context of the Regent's Canal, which has long supported the movement of bats.

Enhancing biodiversity

11.39 Developers of new homes and other major developments will be expected to demonstrate that biodiversity has been fully integrated into the design and development of their scheme from an early stage. For many years, local planning policies have successfully secured green roofs and species features, such as bird and bat boxes, helping to boost local biodiversity. Given this the Council will seek biodiversity enhancements, commensurate with the size of a scheme, with priority given to delivering these on-site.

11.40 The layout and type of habitats provided should take into account the site's role in providing a buffer for, and connections to, nature sites and wildlife corridors. As a benchmark, 50% of total planting should be native species and 50% species of recognised value to biodiversity, such as those on the Royal Horticultural Society's 'Plants for Pollinators' list.

11.41 Local sites alone are insufficient to sustain a thriving local ecosystem. The Camden Biodiversity Strategy highlights the essential need for wildlife to be able to move between areas to find food, shelter and a mate. The Strategy emphasises the need to develop, improve and expand networks of corridors and 'stepping stones' to facilitate this, which will also help to provide greater resilience for wildlife to respond to extreme weather events. Neighbourhood forums and other residents' groups have already been active in investigating what opportunities exist for improving networks in their areas and maps are set out in some adopted neighbourhood plans showing existing and proposed corridors. Wildlife corridors may in some cases also provide wider health and well-being benefits for residents, by extending access to, and experience, of nature (in local green spaces and private gardens).

11.42 At both the London wide and borough level, Nature Recovery Networks are being developed through engagement with partners. These will provide a basis for making informed decisions on what to do for nature and help to prioritise where this is likely to have the greatest benefit. We do, however, recognise that smaller scale connections to this network will also be needed to bring nature to all parts of Camden.

11.43 The Local Plan's site allocations identify opportunities for biodiversity enhancement on certain key sites. The clustering of major development sites at Kentish Town and Gospel Oak and their proximity to Hampstead Heath and local rail sides could deliver substantial benefit through better connectivity and the buffering and expansion of existing habitats. Key green infrastructure projects identified in the Local Plan include the Camden Highline (running alongside the north London railway line between Camden Town and King's Cross), the Camden Nature Corridor (linking sites in Kentish Town with Hampstead Heath) and the Camden Green Link (encompassing the Bloomsbury Green Corridor, linking Hampstead Heath to the southern borough boundary). The Council's emerging Green Infrastructure Strategy is likely to identify further routes as part of a boroughwide approach to delivering a greener and healthier environment. This strategy is also likely to reflect elements of the developing Nature Recovery Network.

Biodiversity net gain

11.44 The government introduced 'Biodiversity Net Gain' as a national scheme in England in 2024. It is based on a 'metric-driven' approach and is a mandatory requirement, meaning it is therefore not principally driven by planning policy. central to its operation is the idea of relative change; that is, the difference between the value of habitats on-site prior to development and the value of the habitats on-site (or off-site) after development has been completed. Biodiversity Net Gain (BNG), as set out in the Environment Act, requires developments that fall within the legislation to provide a minimum 10% net gain in biodiversity. Where a developer is required to provide net gains, the Council's preference is for these to be provided on or near the development site.

11.45 The delivery of BNG will vary depending on the site. For example, it is possible that on some larger sites BNG will not apply because there is either zero or minimal existing habitat, while other sites may have potential to deliver gains significantly above the 10% threshold given their proximity to designated wildlife sites. Given this, the Council will seek to negotiate enhancements commensurate with the scale and opportunities provided by an individual development scheme/site. The Local Plan's site allocations identify where there are particular opportunities to create and enhance habitat. Existing tools, such as the London Plan's Urban Greening Factors, will also help to deliver biodiversity gains in the borough.

11.46 Where sites fall within 10 metres of the Regent's Canal, the canal may have a role in the delivery of off-site biodiversity net gains and early engagement with the Canal and River Trust should be sought.

Integrating biodiversity into buildings

11.47 Given the limited availability of land in Camden, one of the main opportunities available for enhancing biodiversity is through the innovative integration of habitats, plants and wildlife into buildings through good architectural design. Given this, we will seek to negotiate biodiverse green and blue roofs in all suitable developments and 'features' such as bird and bat boxes/artificial bat roosts, and bee bricks subject to the impact on heritage assets and amenity.

11.48 There are populations of threatened bird species in the borough linked to the loss of habitat and nest sites and the impacts of climate change. Swifts specifically are an important indicator of a healthy biodiverse environment. We will use planning conditions to ensure new buildings, including home extensions, provide integrated swift bricks unless it has been demonstrated to the Council's satisfaction this is not feasible. Typically, a building needs to be at least 5 metres in height with clearance of around 5 metres between the host building and other buildings/ obstructions. Swift bricks help to support a wide range of small bird species including swifts, house sparrows and starlings. British Standard BS 42021 sets out how they should be installed. Alternatively, artificial nest cups for house martins may be appropriate.

Management and monitoring

11.49 Once a development has been completed, the management and monitoring of habitats may be required. Management plans are used to ensure areas with nature conservation value are retained and reach their full potential by having effective maintenance arrangements in place. This includes giving consideration to mowing regimes in areas dedicated to wildflower planting. Monitoring is used to confirm that relevant environmental measures are being implemented successfully.

11.50 The demolition and construction process can also pose a significant risk to habitats and species, including green corridors. Given this, in order to protect biodiversity, the Council will expect a construction management plan for developments adjoining or within sites of high nature conservation value.

Tree planting and protection

11.51 Tree planting is recognised as an important way of reducing carbon emissions through carbon storage.

11.52 Furthermore, trees provide habitats for wildlife and are important for their visual amenity. Woodland and individual trees can help to provide shade, aid water attenuation, help to preserve soils and increase biodiversity. They can act as stepping-stones for wildlife throughout the landscape and provide important wildlife corridors within the urban environment. Trees can also make places more attractive and cohesive, encourage increased use of walking and cycling routes and contribute to greater health and well-being.

11.53 The National Planning Policy Framework acknowledges the important contribution that trees make to the mitigation of and adaptation to the effects of climate change, as well as to the character and quality of urban environments. It requires that existing trees are retained wherever possible and that opportunities are taken to incorporate trees in new developments, including through the creation of tree-lined streets and the introduction of measures such as community orchards.

11.54 The Council's Tree Planting Strategy sets out the Council's ambitions to increase tree canopy cover in the borough by 3.7% by 2045 (against a baseline of 23% in 2016) and increase tree diversity on land it owns and manages. Policy NE3 below explains how the planning process will support tree planting and protection within development sites and, where appropriate, in the local area.

Policy NE3
Tree Planting and Protection

A. The Council will seek to protect existing trees and secure additional tree planting in the borough. We will:

1. resist the loss of a tree, group of trees, area of woodland, and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. We will also resist proposals which may threaten their continued well-being;
2. make Tree Preservation Orders (TPOs) when necessary to protect specific trees, groups of trees, or woodlands, in the interests of amenity and biodiversity;
3. require applicants to undertake tree surveys, arboricultural impact assessments and the recording of ancient and veteran trees, where appropriate;
4. ensure that where trees are to be retained on developments, these are positively integrated into the design and layout of the proposed scheme;
5. require trees and vegetation, that are to be retained, to be satisfactorily protected both during and following the demolition and construction phase of development, in line with BS5837 'Trees in relation to Design, Demolition and Construction', to minimise any adverse impacts on existing trees and vegetation;
6. require replacement trees and/or vegetation to be provided where the loss of, or harm to, the well-being of significant trees and/or vegetation has been justified in the context of the proposed development. New tree planting should be guided by a benchmark of planting two new trees for each one lost;
7. prioritise securing replacement trees and vegetation on-site. Where it can be demonstrated to the Council's satisfaction that this is not possible, a financial contribution will be secured to enable the planting and subsequent maintenance of replacement trees and vegetation off-site;
8. require developments to incorporate additional trees and vegetation wherever possible, and especially in areas of low tree cover, as part of a detailed landscaping scheme for the site. A landscape management plan must also be submitted for all major developments, including, but not limited to, details of the trees and vegetation to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development; and
9. expect the applicant to replace trees lost prematurely due to death or disease up to 10 years from when the landscaping plan was implemented.

Tree protection

11.55 The Council will seek the retention of trees and vegetation of significant amenity, historic, cultural or ecological value. This includes trees within the public highway and on land adjacent to development sites which can potentially be affected by a proposed development. Trees and vegetation are important to the contribution that a site and its setting make to townscape character and amenity, and have a sense of maturity which replacement planting may lack. Ancient woodland and ancient or veteran trees found outside ancient woodland are particularly valuable, as once lost they can never be replaced. The ancient woodland in Camden forms part of the Hampstead Woods Site of Special Scientific Interest (SSSI).

11.56 A tree survey will be needed for any site with a tree or where the Root Protection Area on a neighbouring site would be affected. The survey should identify which trees will be retained and protected on-site. An arboricultural impact assessment will also be required to ensure that all possible impacts of a scheme on trees and vegetation are fully considered, and that potential harm is avoided or successfully addressed.

11.57 Applicants will be required to take measures to minimise any adverse impacts from development on retained and proposed trees and vegetation as far as possible. This includes the potential risk of damage arising from demolition or construction works, and development that fails to allow sufficient space above and below ground to prevent damage to root systems or facilitate future growth. These measures should be agreed with the Council prior to commencement and implemented to the Council's satisfaction. Natural England and the Forestry Commission have published 'standing advice' for local planning authorities regarding development proposals affecting ancient woodland, ancient trees and veteran trees. The Council will treat this as a material planning consideration for such schemes and developers will be expected to have due regard to this.

11.58 All design elements of a development should be arranged to ensure a good relationship between the development and trees to be retained and planted. This should ensure new planting has space to develop and mature, and existing trees continue to grow and flourish, without causing harmful nuisance for the occupants of the scheme or surrounding community.

11.59 Camden Planning Guidance on Trees sets out more detail on the information required by the Council to ensure that there is a systematic approach to the safeguarding of trees and vegetation within development sites and on adjacent land (including street trees), both during and following the construction process. Developers will be expected to have due regard to this. The Council will also expect developers to follow the principles and practice set out in 'British Standard 5837 - Trees in relation to design, demolition and construction - Recommendations'.

11.60 Where proposals involve veteran trees, the Council will use planning conditions to require works to be undertaken by arboriculturists with a veteran certificate qualification.

Tree preservation orders

11.61 Many trees in the borough are covered by a Tree Preservation Order (TPO). A Tree Preservation Order is made by the Council to legally protect a specific tree or group of trees that provide public amenity or are of cultural or historic significance. The principal effect of a TPO is to prohibit the cutting down, uprooting, topping, lopping, wilful damage, or wilful destruction of trees without consent.

11.62 As part of the consideration of a planning application the Council will consider whether a TPO is needed. Members of the public can also draw the Council's attention to trees or groups of trees they consider to be important to the area and suitable for a TPO. Outside of the TPO process, some neighbourhood plans have also identified trees considered by the community to be of particular importance or value and developers should have due regard to this.

11.63 Works to trees with a TPO, above or below ground, require the Council's permission. Works to a tree with a TPO that is needed to enable the implementation of a planning permission are dealt with as part of a planning application. The Council can also require existing trees, including those that are not the subject of a Tree Preservation Order, to be protected and retained using planning conditions. Furthermore, the Council also has powers to use 'conditional TPOs' which can be applied prior to planting.

Replacement trees

11.64 Where the felling of either protected or significant trees has been demonstrated to be unavoidable, the Council will seek replacement planting on-site of an appropriate size, number and species in an appropriate location. There will be occasions where it may not be possible for trees – or trees providing the same amenity or biodiversity benefits – to be replaced on-site because of the footprint of proposed new buildings. It will always be the Council's priority for any significant trees lost to be replaced within the curtilage of the development. As a working benchmark, we expect at least two new trees to be planted for every tree lost. This benchmark will be applied flexibility, recognising that site constraints can impact on the ultimate size of trees, and we will therefore give preference to proposals where trees can be sustained into maturity.

11.65 Where it is demonstrated to the Council's satisfaction that replacement planting is not feasible, we will expect equivalent benefits to those provided by existing trees and vegetation to be secured and realistic replacement and/or compensation to be provided. A methodology such as 'i-tree' should be used to inform replacement planting for large major applications (100 or more homes or 2,500 sqm or more commercial floorspace). The i-tree tool can be used to quantify the value provided by individual trees taking account of benefits they provide such as air quality, carbon dioxide reduction, shading and stormwater management. We will expect applicants bringing forward large major schemes to submit an i-tree assessment (or an alternative methodology which has been agreed with the Council) as part of the planning application.

11.66 The Council will prioritise the use of any commuted sums for the funding tree of planting in the immediate area, for example tree planting on Council owned land such as highways, parks, housing estates and nature reserves. This funding will also be expected to cover maintenance costs, and will be secured by a S106 agreement.

Tree planting

11.67 Section 197 of the Town and Country Planning Act 1990 places a duty on the Local Planning Authority to secure the planting of new trees. This will partly be delivered by increasing planting on private land, and by helping developers and residents to make informed choices in relation to the planting of trees. Applicants should seek opportunities to restore and enhance planting throughout the site as part of their landscaping scheme. The Council will take a 'right tree for the right place' approach with the aim of delivering an attractive treed environment with age and species diversification. This will also ensure that trees have the optimum conditions for establishment and longevity for future generations to enjoy. The landscaping or planting scheme should take into account the impact of trees when they are fully grown and provide sufficient replacement trees to mitigate the loss of canopy cover where appropriate.

11.68 There are a range of factors that applicants should be aware of when considering new tree planting, including:

- the amenity value of any trees to be removed;
- ecology – the Council will expect new trees and vegetation to increase the biodiversity value of the site;
- historic context – trees should take account of the existing qualities of the site and complement the surrounding architecture and the historic landscape character, recognising the evolution and use of the site, the local character and important views;
- the desirability of including suitable native species, including the use of locally or UK sourced and grown stock;
- availability of space – this should take account of both Root Protection Areas and buffer zones, as well as the impact of different tree species on buildings above and below ground and ancillary structures, such as boundary walls. The Council will also expect the planting plan to consider the potential for trees, over their lifetime, to give rise to unacceptable loss of light to habitable rooms and any necessary clearances for CCTV, street lighting and overhead cables and high/large vehicles. Trees should be planted in positions which permit a tree to grow to maturity without inhibition of form;
- soil conditions including hydrogeology – ensuring there is sufficient soil volume, the right soil type and drainage in order that roots can grow and function properly;
- potential for improvements to air and soil quality;
- resilience to pests and disease;
- adapting to climate change – taking opportunities to improve a site/area's sustainability and function. Applicants should also consider the ability of trees/vegetation to withstand drought and extreme weather, and changes in the prevalence of pathogens;
- long-term resource consumption - the level of input required for the management and maintenance of trees and the effect this has on lifespan; and
- advice in BS 8545 Trees: from nursery to independence in the landscape – Recommendations.

11.69 Information on Camden's wider tree population is set out on the Council's Open Data platform and will be a useful resource for applicants to inform planting schemes.

Tree maintenance

11.70 It is important that there is a robust management regime for newly planted trees and landscaping schemes to ensure that trees and vegetation are able to reach maturity and deliver maximum benefits and functions throughout their life. Maintenance requirements and aftercare management should be considered during the design stage (for example ensuring there is access for maintenance, storage for materials on-site and availability of sources of water). This will also ensure that the overall sustainability of the planting scheme is acceptable, and that trees and vegetation do not become a nuisance.

11.71 The Council will expect the detailed landscaping scheme or planting plan to include a management plan, to be secured by a planning condition or in a Section 106 agreement. This will ensure that all planting on site is sustainable and adequately maintained in line with standard BS8545 for a sufficient duration. The Council will also expect the applicant to replace trees lost prematurely due to death or disease up to 10 years from when the landscaping plan was implemented.

Water quality

11.72 It is important that we take steps to safeguard water quality in Camden to protect drinking water and prevent harm to the natural environment.

11.73 Development activities may impact surface water and groundwater quality. The way water is used in a building and the pollutants it picks up running across a site also affect the quality of the water that reaches groundwater sources.

11.74 Camden has one groundwater Source Protection Zone (SPZ) with an inner and outer catchment. These are water abstraction sites whose purpose is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon drinking water abstraction. The inner SPZ is located within the southwest of Primrose Hill Park with the outer zone located in south Hampstead covering the area from Prince Albert Road to Swiss Cottage.

11.75 Areas to the north and south of Camden (around Hampstead Heath, Hampstead, Bloomsbury and Holborn) are also designated as Secondary A aquifers which are capable of supporting local water supply. As such, groundwater is sensitive in these areas and the quality and quantity of groundwater needs to be protected.

11.76 Policy NE4 seeks to protect water quality in Camden and ensure that the groundwater SPZ and Secondary A Aquifers set out above and designated on the Local Plan Policies Map are taken into account when considering the environmental impact of a development.

Policy NE4
Water Quality

A.	The Council will expect developers to identify whether their site is within the borough's groundwater Source Protection Zone or Secondary A aquifers, and whether the development activity could affect the quality or quantity of groundwater.
B.	Where development poses a risk to groundwater within the borough's groundwater Source Protection Zone, applicants must submit a Hydrogeological Risk Assessment. If the Hydrogeological Risk Assessment identifies unacceptable risk, the developer will be required to provide appropriate mitigation.
C.	The Council will require developers to undertake a Foundation Works Risk Assessment (FWRA) where piled foundation works are proposed within a SPZ, or where piled foundations extend through the London Clay to Secondary A aquifers, to ensure that the risks to groundwater are minimised.
D.	The Council will require development within the borough's Secondary A aquifers to protect groundwater from pollution.
E.	The Council will expect developers to prevent discharges to groundwater through land affected by contamination.
F.	All development proposals located adjacent to the Regent's Canal are required to protect and improve the benefits provided by the water environment to help to ensure that the waterway can reach and maintain good ecological status, in accordance with the recommendations of the Thames River Basin Management Plan.

Groundwater designations

11.77 The Council's Local Plan Policies Map and Strategic Flood Risk Assessment identifies the borough's groundwater SPZ and Secondary A aquifers. Developers will be expected to identify within their planning application whether a site is within one of these designated areas and if the development activity proposed has the potential to affect groundwater quality or quantity. The assessments identified in the sections below should be submitted with a planning application when this applies.

Hydrogeological risk assessment

11.78 Developments that pose a risk to groundwater must submit a Hydrogeological Risk Assessment (HRA) to the Environment Agency and the Council as planning authority. Any activities that can adversely affect groundwater must be considered, including physical disturbance of the aquifer. 'The Environment Agency's approach to groundwater protection' identifies a number of development activities which could result in physical disturbance to aquifers and groundwater resources. These include: ground source heat pumps; new road schemes; developments that require piling; foundation development; and basement excavations. These activities can artificially lower or raise groundwater levels, alter groundwater flow paths, or even cut off groundwater flow completely. This can all result in water resource and quality problems.

11.79 If the HRA identifies unacceptable risk, then the applicant must provide appropriate mitigation, which should be agreed by the Council and Environment Agency in writing prior to implementation. Within the inner groundwater SPZ, the Environment Agency will normally object in principle to any planning application that may physically disturb an aquifer.

Foundation works risk assessment

11.80 Where piled foundation works are proposed in the groundwater SPZ, or where piled foundations extend through the London Clay to Secondary A aquifers, then a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised. Current available guidance includes the Environment Agency's Piling in layered ground: risks to groundwater and archaeology, and Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (National Groundwater and Contaminated Land Centre report NC/99/73).

Protecting groundwater from pollution

11.81 Secondary A aquifers support water supplies at a local, rather than strategic, scale. As such, groundwater is sensitive in these areas and the quality and quantity of groundwater should be protected and enhanced through any future development works. The Environment Agency's Approach to Groundwater Protection should be consulted for development constraints at sites above Secondary A aquifers.

11.82 Where land is potentially contaminated as a result of current or former uses, applicants will be required to carry out a Preliminary Risk Assessment to identify any potential impact on water quality. The Council will expect developers to prevent discharges to groundwater through land affected by contamination.

11.83 Further details on the Council's requirements in relation to assessing and remediating contaminated land are set out in Policy A1 (Protecting Amenity) and in Camden Planning Guidance on Amenity, to which developers will be expected to have due regard.

Thames river basin management plan

11.84 The Water Framework Directive requirements for wastewater and improvements to the water environment are maintained through the Thames River Basin Management Plan and Catchment Plans.

11.85 Camden is within the Thames River Basin District and London management catchment. The Regent's Canal (which is a branch of the Grand Union Canal) runs through the centre of the borough. The Canal forms part of London's Blue Ribbon Network, which has its own set of policies within the London Plan. The quality of the Regent's Canal is of 'moderate' status, and is not reaching 'good' as mitigation measures still need to be implemented. The Council will have regard to the Thames River Basin Management Plan, which contains the actions needed to tackle the main issues of the water environment, when assessing development proposals located adjacent to the Regent's Canal.

12

Design and Heritage

12 Chapter

Achieving design excellence

12.1 Camden is diverse and dynamic with many distinctive neighbourhoods, each of which has its own unique character and identity and contributes towards making the borough such an attractive place to live, work and visit.

12.2 The borough also has a rich architectural heritage, with over 5,600 nationally listed buildings and structures and 40 conservation areas, which contribute towards local distinctiveness both within Camden and London as a whole.

12.3 Good design is essential to creating places, buildings, and spaces that work well for everyone, look good, last well, and will adapt to the needs of current and future generations. Design also has a fundamental role in both tackling and responding to climate change and creating healthy and sustainable spaces and places that help reduce inequality and promote health and well-being for all.

12.4 National planning policy is clear that planning should always seek to secure high quality, well-designed and sustainable buildings and places and that good design is indivisible from good planning.

12.5 Policy D1 seeks to maintain and enhance the borough's character and distinctiveness, whilst ensuring that new development is designed and built to exemplary standards, to maintain and secure a high-quality environment for everyone to enjoy, both now and in the future.

Policy D1
Achieving Design Excellence

A. All development in Camden must achieve excellence in the architecture and design of buildings and places, responding to the climate emergency, improving the health and well-being of our communities, and celebrating Camden's diversity of people and place.

B. The Council will expect development to:

1. respond positively and sensitively to local context and character through layout, orientation, scale, height, bulk, massing, proportion, appearance and the use of high quality materials;
2. seek to create character where none exists;
3. preserve or enhance the historic environment and heritage assets in accordance with Policy D5 (Historic Environment);
4. respect local views and preserve protected strategic views;
5. be sustainable in design and construction, incorporating best practice in resource efficiency, energy reduction and climate resilience measures, in accordance with Climate Change Policies CC1 to CC11;
6. be functional, and designed to take into account the proposed use and needs of the expected occupants of the building, and other users of the space;
7. be designed to be flexible and adaptable to meet the needs of future users and occupiers;
8. meet the highest practicable standards of accessible and inclusive design in accordance with Policy SC2 (Access for All);
9. promote health and well-being in accordance with Policy SC1 (Improving Health and Well-being);
10. be safe and secure, and designed to minimise crime and antisocial behaviour, incorporating ground floor uses that create interest and activity and ensure that public spaces are highly visible in accordance with Policy A2 (Safety and Security);

Policy D1
Achieving Design Excellence

11. carefully integrate building services equipment (plant) into the architectural quality of the building, minimising visual clutter and ensuring there is no harm to the wider townscape and the amenity of neighbouring occupiers. Where plant enclosures are provided these should be designed and located to allow for future adaptability;
12. avoid having a detrimental impact on existing solar photovoltaic panels, for example, through overshadowing;
13. incorporate adequate servicing for each land use within the footprint of the building/s and site, where required;
14. provide facilities for the storage, separation and collection of all types of waste and recycling, that are appropriately located to facilitate waste collection;
15. respond to natural features and incorporate outdoor amenity space, where appropriate;
16. provide visual interest from all aspects and incorporate public art where appropriate;
17. connect well with existing places, spaces and routes, and allow effective movement between the site and the surrounding area;
18. be easy to navigate and move through, with recognisable routes and signage;
19. create high quality, healthy streets that support and encourage walking, wheeling and cycling in accordance with Policy T2 (Prioritising Walking, Wheeling, and Cycling).

Policy D1
Achieving Design Excellence

C. Where public spaces are provided as part of developments the Council will expect these spaces to:

1. be well located; of a high quality; and designed to be safe, secure, welcoming, uncluttered and accessible for all;
2. celebrate and reflect the diversity of the communities they are within, for example through high quality interpretation, events, public art and decorative features co-designed with local people;
3. incorporate outdoor seating, sheltered rest places, quiet spaces, street furniture, boundary treatments, lighting and signage, where appropriate. This should be well designed and sensitively located, to make a positive contribution to the character and distinctiveness of the area;
4. provide water fountains and free, publicly accessible toilets suitable for a range of users, where appropriate;
5. provide opportunities for formal and informal play, where appropriate; and
6. incorporate high quality landscape design and maximise opportunities for greening, to enhance biodiversity, promote health and well-being, manage flood risk, and provide opportunities for shade; for example through the planting of trees and the provision of open space, soft landscaping, rain gardens and areas for food growing.

D. Developers must evidence how they have responded positively to the design policies in the Local Plan, and associated guidance, as part of the Design and Access Statement submitted with their planning application.

E. Developers should seek to ensure that their design teams are as diverse as the communities they are building in, to ensure that schemes are designed to meet the needs of all.

F. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Promoting and achieving design excellence

12.6 The Council is committed to excellence in design. It is working with its partners to promote design excellence and improve public buildings, landscaping, open spaces and the street environment. Camden's commitment to seeking the highest design quality has resulted in many developments in the borough being recognised both nationally and Londonwide in design award schemes.

12.7 The borough contains many special and unique places, many of which are protected by conservation area status. Policy D1 (Achieving Design Excellence) requires development schemes to improve the quality of buildings, landscaping and public spaces and the Council will not approve design which is inappropriate to its context or fails to improve the character of an area.

12.8 In order to achieve high quality design in the borough we require applicants to consider buildings in terms of:

- context;
- height;
- accessibility;
- orientation;
- scale and massing;
- siting;
- functionality and layout;
- detailing;
- materials.

12.9 These issues apply to all aspects of a development, including buildings and other structures (for example substations, refuse or cycle storage), outdoor spaces, landscaping and access points and should be considered at an early stage of design, as these elements are often difficult to change at later stages.

12.10 Policy D1 sets out key principles for achieving high-quality design. Further guidance on this and the Council's approach to design is set out in Camden Planning Guidance on Design, and developers will be expected to have due regard to this.

Design quality in Camden

12.11 When designing development proposals, developers are expected to have regard to the policies in this Plan, the London Plan, the north London Waste Plan and Neighbourhood Plans, in addition to design guidance prepared by the Council, the GLA, the government and other bodies, including, but not limited to:

- Camden Planning Guidance covering design; access for all; amenity; artworks, statues and memorials; basements; energy efficiency and adaptation; home improvements; planning for health and well-being; and public open space;
- guidance provided in Planning Frameworks;
- guidance set out in Conservation Area Appraisals;
- guidance set out in the Camden Characterisation Study;
- supplementary planning guidance issued by the Mayor of London;
- guidance set out in the National Design Guide and National Model
- design codes; and
- Sport England's Active Design guidance.

12.12 To secure design excellence, the Council will consider using mechanisms such as:

- requiring a sufficient level of design information, including key construction details, to be provided as part of planning applications to ensure the quality of design can be maintained if a permitted scheme is subject to subsequent minor amendments;
- requesting that detailed designs, scaled drawings, plans, elevations, sections and supporting information are provided to illustrate a proposal, where appropriate;
- the use of townscape experts on applications for major development;
- ensuring the wording of any planning permission granted, and associated conditions and/or legal agreement, provide clarity regarding the quality of design expected; and
- the use of architect retention clauses in legal agreements where appropriate.

Designing public spaces

12.13 The design of public spaces, and the materials used, is very important. The size, layout and materials used in the spaces around buildings will influence how people use them, and help to create spaces that are welcoming, attractive, safe and useful. They can also contribute to other objectives such as reducing the impact of climate change (for example, the use of trees and planters to reduce run-off and provide shading), biodiversity, local food production and Sustainable Drainage Systems (SuDS), and provide useful amenity space.

12.14 The spaces around new developments should be considered at the same time as the developments themselves and hard/soft landscaping and boundary treatments should be considered as part of the wider cohesive design.

12.15 Camden has developed its first ever Diversity in the Public Realm strategy, that seeks to create a Camden that is truly representative of the people within our communities, through its public spaces. It is important that development in the borough has regard to this strategy and seeks to deliver its aims and objectives.

12.16 Public art can be a catalyst for improved environmental quality by upgrading and animating public space and enhancing local character and identity through helping create a sense of place. The Council will therefore encourage the provision of art and decorative features as an integral part of public spaces, where they are appropriate to their location and enhance the character and environment.

Storage and collection of recycling and waste

12.17 Developers should ensure that all waste systems and storage areas in new developments or refurbished developments are:

- designed to provide adequate space for the temporary storage of all types of waste, including internal storage areas with sufficient space for the separation of temporary storage of all recycling, food waste and residual waste;
- sensitively designed and located in relation to the local environment especially in conservation areas and listed buildings;
- safely located and accessible for all users, including waste contractors, and designed to minimise nuisance to occupiers and neighbours and their amenity;
- sufficiently flexible to accommodate future increases in recycling targets; and
- designed to include, where appropriate, innovative waste management solutions that increase efficiency and help meet and exceed recycling and other waste reduction targets.

12.18 The Council will expect details of the proposed storage space for waste and recyclable material to be specified and agreed as part of the planning application process.

12.19 Developers should ensure that all storage areas and systems are designed to meet current waste and recycling targets as a minimum, and are sufficiently flexible to meet more ambitious future targets.

12.20 All new build development, in particular those involving multiple dwellings or commercial units requiring communal bins, must submit a waste strategy alongside a planning application detailing arrangements for the management of all types of waste, as detailed in the Council's technical guidance. Developers should consult the technical guidance for further advice on space standards and other requirements before submitting a planning application. Further information on waste and recycling is available in Camden Planning Guidance on Design and developers will be expected to have due regard to this.

Community engagement

12.21 Development in Camden should meet the needs of Camden's residents. It is therefore important that local people of all ages are involved in the design of new buildings, spaces and places in Camden, to give them a genuine opportunity to shape the development of their neighbourhoods. This also provides developers with a vital resource to help them understand the neighbourhood they are building in and create somewhere special and valued.

12.22 The Council will expect developers to engage with local communities on the design of schemes as part of the planning application process. Engagement should be at a level appropriate to the scale of the proposals, undertaken from the outset of a project, and prior to the submission of proposals to the Council for consideration. The Council will expect developers to evidence what engagement they have undertaken with local communities, the key issues raised and how this has been used to inform the design and development of their scheme as a whole. This should be set out in the Design and Access Statement that accompanies the planning application for the scheme. Further guidance on community engagement as part of the planning application process is set out in the NPPF and in the Council's Statement of Community Involvement.

12.23 Given the diverse nature of Camden's communities, to ensure that development schemes are fully inclusive and take into account everyone's needs, developers should also seek to ensure that their design teams are as diverse as the communities they are building in, to ensure that schemes are designed to meet the needs of all.

Design and access statements

12.24 Developers should explain and justify their response to the components of good design set out in Policy D1 and the other design policies in this Plan through a Design and Access Statement. This should show that they have thought carefully about how everyone, in particular d/Deaf, disabled and neurodiverse people, older people, women, gender diverse people, and children, will be able to use the places created.

12.25 Design and Access Statements are required to accompany all planning, conservation and listed building applications, except in certain circumstances as set out on our website.

Independent design review

12.26 Securing high quality development requires rigorous, early and effective dialogue between all those involved in the development process. Design review is normally undertaken by a Design Review Panel and provides additional expert advice to inform the planning process.

12.27 Developers and landowners will be encouraged to use design review as a useful mechanism for supporting the process of securing high quality design. Review will be expected for significant development proposals. Proposals may be considered significant in terms of their scale, location or nature.

Tall buildings

12.28 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline.

12.29 While tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered in order not to detract from the nature of surrounding places and the quality of life of those living and working around them.

12.30 In line with the approach set out in the London Plan 2021, Policy D2 defines what a 'tall building' is for specific localities and identifies locations where tall buildings may be an appropriate form of development in Camden, subject to meeting the other requirements of the Plan. It also sets out criteria to guide the determination of applications for tall buildings in the borough.

Policy D2
Tall Buildings

A. The Council defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured from the lowest point on the ground to the uppermost part of any rooftop structures (including plant and lift overruns), as shown on Figure 22.

B. Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Figure 22 and listed in Table 12. Guidance on building heights for specific sites is set out in relevant site allocation policies.

Policy D2
Tall Buildings

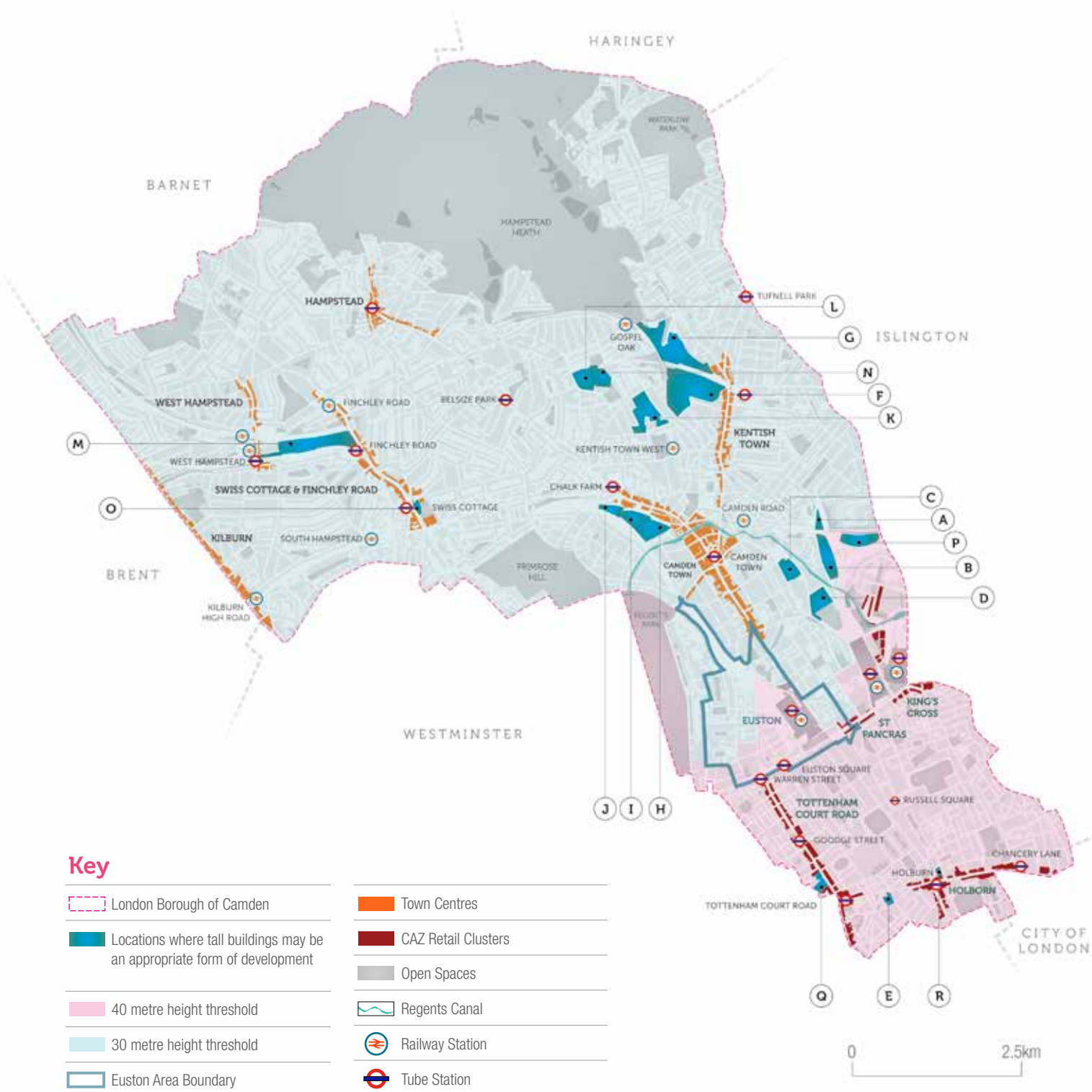
C. The Council will assess proposals for buildings above the heights set out in Part A against the London Plan tall buildings policy and the design criteria in Local Plan Policy D1 (Achieving Design Excellence). We will also give particular attention to:

1. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline, having regard to both the existing and the emerging context;
2. the relationship between the building and neighbouring boroughs, where tall buildings are proposed close to the borough boundary;
3. whether the proposal maximises energy efficiency and resource efficiency in accordance with Climate Change Policies CC3, CC4 and CC6;
4. whether the development delivers the highest standards of sustainable design and construction in line with Policy D1 (Achieving Design Excellence);
5. whether the proposal maximises the supply of affordable housing in accordance with Policy H4 (Affordable Housing);
6. whether the proposal creates a safe and secure environment in accordance with Policy A2 (Safety and Security);
7. whether the site is of a sufficient size to accommodate a tall building, without having a detrimental impact on existing buildings, public spaces and amenity;
8. the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets in accordance with Policy D5 (Historic Environment);
9. the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views;
10. the contribution a building makes to pedestrian movement and experience, connectivity and improved public accessibility;
11. the degree to which the building overshadows neighbouring buildings and spaces, especially public spaces, open spaces, watercourses and renewable energy infrastructure;
12. the relationship between the building and other neighbouring tall buildings;
13. the contribution the development makes to wider place making objectives and infrastructure delivery in line with Policies DS1 (Healthy and Sustainable Development), D1 (Achieving Design Excellence) and DM1 (Delivery and Monitoring);
14. the quality of homes and amenities provided;
15. the proposed internal and external illumination of the building. All tall building proposals will require a Lighting Strategy; and
16. the impact on biodiversity, for example migratory routes and bird collisions, in accordance with Policy NE2 (Biodiversity).

Figure 22:

Tall Buildings

Tall building definition and locations where tall buildings may be an appropriate form of development



Key

- London Borough of Camden
- Locations where tall buildings may be an appropriate form of development
- 40 metre height threshold
- 30 metre height threshold
- Euston Area Boundary
- Town Centres
- CAZ Retail Clusters
- Open Spaces
- Regents Canal
- Railway Station
- Tube Station

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Table 12 | Locations where tall buildings may be an appropriate form of development.

Map Reference	Policy Number	Site Name
A	S5	120-136 Camley Street
B	S6	104-114 Camley Street
C	S7	Parcelforce and ATS Tyre Site
D	S8	St Pancras Hospital
E	S17	Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street
F	C2	Regis Road and Holmes Road Depot
G	C3	Murphy Site
H	C7	Morrisons Supermarket
I	C10	Juniper Crescent
J	C11	Network Rail at Juniper Crescent
K	C13	West Kentish Town Estate
L	C15	Wendling Estate and St Stephens Close
M	W2	O2 Centre, car park, car showrooms and 14 Blackburn Road
N	C23	Former Flats 121–129 Bacton, Haverstock Road
O	W12	100 Avenue Road
P	S20	York Way Depot and adjacent land at Freight Lane
Q	Non allocated site	Central Cross
R	Non allocated site	110 High Holborn

12.31 Figure 22 shows where the tall building thresholds set out in Policy D2 Part A will apply and identifies locations in the borough where tall buildings may be an appropriate form of development, subject to assessment against Policy D2, which sets out the criteria against which the Council will assess proposals for tall buildings, Policy D1 (Achieving Design Excellence), London Plan policy on tall buildings, and other relevant Local Plan policies, including but not limited to, heritage, amenity, health and well-being, safety and security, climate change and affordable housing. 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.

12.32 The Euston Area Plan sets out the policy approach to tall buildings in the designated Euston area and identifies locations where tall buildings may be an appropriate form of development. Applications for tall buildings within the boundary of the Euston Area Plan should therefore also have regard to the Euston Area Plan.

12.33 Tall buildings in Camden will be expected to be of the highest design quality in terms of their appearance, but also internally and in their environmental performance, sustainability, urban design, and safety against fire. Tall buildings should also be designed to promote health and well-being, address potential suicide risks and create a safe and secure environment.

12.34 Key considerations relate to the integration of a building into the surrounding area, and in particular how it relates to adjacent buildings and spaces; its relationship with neighbouring tall buildings; and its impact on public spaces. When integrating tall buildings, particularly those with a tower and podium, into existing or proposed new streets, the base of a building formed by a podium should relate to the prevailing height of other buildings forming the street frontage.

12.35 In addition to making a positive contribution to the public realm through the design of the base of the building, particular care should be taken to ensure that the design of tall buildings minimises any impacts on local microclimates in terms of potential increases in wind speeds, wind turbulence and overshadowing. Furthermore, careful consideration must be given to the impact of a proposal on the sky view and skyline from the public realm.

12.36 The Council will seek to ensure that developers incorporate ground floor uses that create interest and activity and maximise the visual richness of the design of the base of any proposed tall building and how it integrates with the streetscape. Proposals should seek to provide legible entrances and minimise the impact of any dead or blank frontages. Careful consideration should be given to the location of loading bays, vehicular entrances and servicing requirements and their impact on the public realm.

12.37 Further relevant guidance to the Council's approach to tall buildings is set out in:

- the Euston Area Plan and the Fitzrovia Area Action Plan;
- conservation area appraisals and management strategies; and
- the Camden Character Study.

12.38 The Council will take these documents into account, where relevant, in assessing applications for tall buildings.

Design of housing

12.39 The design of homes has a huge influence on the health and well-being of its occupiers. It is therefore important that new homes are designed to meet the needs of all Camden's residents.

12.40 Homes should be designed to be flexible and adaptable, taking account of changes in the age profile of the borough's residents, and particularly the growth in the number of older people, in addition to the needs of future generations.

12.41 The Council will therefore seek to secure a variety of high quality homes to meet the needs of different users in accordance with the housing policies in this Plan and will not compromise quality in order to maximise overall housing delivery.

Policy D3
Design of Housing

A. All housing development, including proposals for the alteration, extension, and conversion/change of use of existing buildings that deliver additional floorspace or additional homes, must be designed and built to create high quality, accessible homes. The Council will:

1. expect housing development to meet the residential design standards set out in the London Plan and have regard to the Supplementary Planning Guidance issued by the Mayor and the Council;
2. expect housing development to be sustainable in design and construction, incorporating best practice in resource efficiency, energy reduction and climate resilience measures, in accordance with policies D1 (Achieving Design Excellence) and climate change policies CC1 to CC11;
3. expect all new homes to be dual aspect;
4. support the extension and alteration of existing homes provided the proposal is in accordance with Policy D4 (Extensions and Alterations);
5. expect the design of all housing to provide functional, adaptable and accessible spaces;
6. expect housing development to provide appropriate facilities for the storage, separation and collection of all types of waste and recycling;
7. expect all self-contained homes to meet the nationally described space standard;
8. require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2);
9. require 10% of new-build self-contained homes in each development to be wheelchair user dwellings in accordance with Building Regulation M4(3), with features incorporated into the building to provide for safe evacuation without twenty-four hour on-site management;
10. require housing development to provide private outside space, for example balconies, roof terraces and/or communal gardens;
11. expect housing developments, where appropriate, to incorporate good- quality, accessible play provision for all ages in line with the London Plan policy on play and recreation; and
12. seek the delivery of biodiversity enhancements in line with Policy NE2 (Biodiversity).

Housing design

12.42 The Council will expect housing in Camden to be designed with regard to:

- the relevant policies in the Plan, particularly those on housing, design, extensions and alterations, heritage, climate change and biodiversity;
- Camden Planning Guidance, particularly those on design, housing, sustainability, amenity and transport;
- London Plan policies, particularly those on design, housing and play;
- Supplementary Planning Guidance issued by the Mayor of London; and
- Building for a Healthy Life - the industry and government endorsed standard for well-designed homes and neighbourhoods.

12.43 Developers should explain and justify their response to the components of good design set out in this policy, elsewhere in this Plan and in other documents, in the Design and Access Statement to be submitted with their planning application.

Space standards

12.44 A high-quality home should be designed to ensure sufficient space is available for furniture, activity and movement. The government has produced a 'nationally described space standard' which Local Plans can adopt to ensure that homes are designed with sufficient internal space. The standard sets out the minimum acceptable gross internal area in sqm depending on the number of bedrooms, the number of intended occupiers, and the number of storeys.

12.45 The nationally described space standard forms part of Policy D3 and has also been formally incorporated into the London Plan 2021 (Table 3.1). This standard will be applied to all new dwellings, whether they are created through newbuilding, conversions, or changes of use in line with the Mayor's Housing SPG. Where dwellings will be created from conversions or changes of use, the Council will apply the nationally described space standard flexibly taking into account the constraints arising from conversion of existing buildings, particularly listed buildings and other heritage assets.

12.46 Applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against Policy D3 requirements relating to space standards, in accordance with the Mayor's Housing SPG.

12.47 Specific arrangements apply to considering the standard of internal spaces in developments of specialist housing and housing with shared facilities, as set out below.

Accessible and adaptable dwellings and wheelchair user dwellings

12.48 Many households in Camden require accessible housing to lead dignified and independent lives. Accessible and adaptable dwellings are homes specifically designed to support the changing needs arising through a family's lifecycle, incorporating features to help accommodate pregnancy, prams and pushchairs, injury, disability and old age. These features also allow a dwelling to be easily adapted for even higher levels of accessibility in the future, should the need arise, allowing people to live in their own home for as much of their life as possible. Wheelchair user dwellings are designed to more demanding criteria relating to ease of movement and activity and are intended to be easy to adapt for households that include someone who needs to use a wheelchair within the home.

12.49 The government has produced optional Building Regulation requirements which can be used to increase the accessibility of new build homes to all, including people with physical disabilities. Where accessibility requirements are warranted by local circumstances and are financially viable, the optional Building Regulation requirements can be incorporated in Local Plan policy and applied to specific homes in a development through planning conditions. Policy D3 and the London Plan (policy D7 (Accessible Housing) incorporate the optional requirements and seek to ensure that new build homes meet them where feasible.

12.50 Part M4 of the optional Building Regulations includes two categories – M4 (2) 'accessible and adaptable dwellings' and M4 (3) 'wheelchair user dwellings'. Part M4(3) further distinguishes between 'wheelchair accessible' dwellings (homes ready for occupation by a person using a wheelchair at the point of completion) and 'wheelchair adaptable' dwellings (homes that can be easily adapted to meet the needs of a person using a wheelchair).

12.51 Policy D3 includes a requirement for 90% of new build homes to comply with M4(2) (Accessible and Adaptable Dwellings) and a requirement for 10% of new build homes to comply with M4(3) (Wheelchair User Dwellings). These requirements are consistent with the London Plan and apply across London. Information about where we will require 'wheelchair accessible' dwellings and where we will require 'wheelchair adaptable' dwellings is provided below.

12.52 Compliance with Optional Building Regulation requirements can only be sought where Part M of the Building Regulations applies, and the requirements can only be activated by a planning condition specifying the homes affected. Part M applies to new-build dwellings, but does not apply to dwellings created by changes of use or conversions of an existing building. Planning conditions can also only be used where all elements of the relevant Regulation can be achieved. They cannot be applied to a dwelling where step-free access cannot be achieved. Circumstances where a planning condition may be inappropriate include flats above or below the entry level in a building where incorporation of a lift would not be viable.

12.53 In applying the requirement for 90% M4(2) accessible and adaptable dwellings and 10% M4(3) wheelchair user dwellings, the Council will round the number of homes required in each category to the nearest whole number such that the total requirement for M4(2) and M4(3) dwellings adds up to 100%. The Council will not require M4(3) wheelchair user dwellings as part of developments that provide five additional dwellings or fewer.

12.54 The Council will generally apply the requirement for 10% wheelchair user dwellings across each housing type or tenure in a scheme, seeking 10% of market housing, 10% of low-cost rented housing (Social Rent or London Affordable Rent) and 10% of intermediate housing. We may seek to increase the percentage of wheelchair user dwellings in the low-cost rented sector and reduce the percentage in the market or intermediate sectors, or both, where this will enable us to meet an identified need for low-cost rented housing appropriate to people who use wheelchairs.

12.55 In the market and intermediate sectors, we will use planning conditions to secure wheelchair user dwellings that comply with Part M4(3)(2)(a) requirements for 'wheelchair adaptable' dwellings. Households that include a person who uses a wheelchair are much more likely to occupy social rented housing than other tenures, and the waiting list for wheelchair user dwellings far exceeds supply. In the case of low-cost rented housing, future occupiers can be nominated from the Housing Register (waiting list), and from transfer lists. The Council will therefore require 10% of low-cost rented homes in each development to be 'wheelchair accessible' and be fully fitted-out for occupation by a household containing a person who uses a wheelchair. We will use planning conditions to specify those low-cost rented homes that must comply with Part M4(3)(2)(b) requirements for 'wheelchair accessible' dwellings.

12.56 The Grenfell Tower fire occurred after the approval of Part M Volume 1 of the Building Regulations for dwellings. For wheelchair accessible dwellings to be occupied by a disabled person, arrangements are needed for the occupant to be safely evacuated in a fire, as it would not be viable to provide twenty-four hour on-site management. Consequently, buildings designed to provide homes that comply with Part M4(3)(2)(b) must also be designed with features to provide for safe evacuation. This could involve an evacuation lift, or a conveniently located refuge on each floor with Part M4(3)(2)(b) dwellings. Refuges must be outside the home, must be free of smoke (e.g. have an Automatic Opening Vent), must be equipped with an evacuation-call system, and must not impede the means of escape for other occupiers.

12.57 Applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against Policy D3, in accordance with the Mayor's Housing SPG. Specific arrangements apply to considering accessibility in developments of specialist housing and housing with shared facilities. These are set out below.

Space and accessibility for specialist housing and shared housing

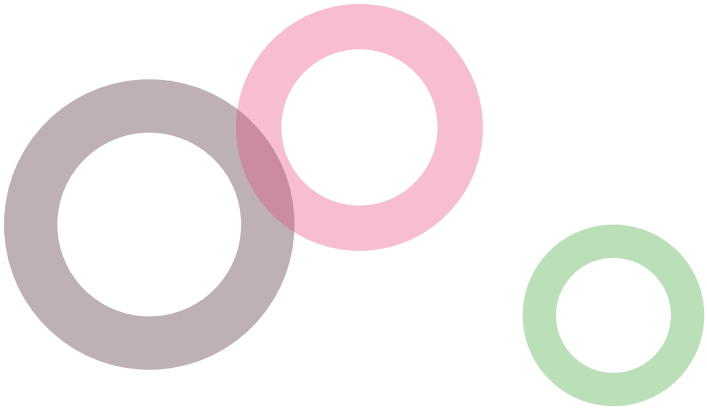
12.58 The Mayor's Housing SPG advises that the nationally described space standard and the optional Building Regulations do not apply to specialist forms of housing such as student housing and care homes. However, the space needed for furniture, activity and movement should be considered when designing all forms of housing, and the Council will expect all proposals to provide adequately sized rooms and convenient and efficient room layouts that are functional and fit for purpose.

12.59 Houses and flats shared by 3-6 people who do not live as a family (small houses in multiple occupation, Use Class C4) can change to Use Class C3 (dwelling houses) without a planning application under legislation. Proposals for homes in Use Class C4 should be designed to comply with Policy D3 in respect of space standards and optional Building Regulations if they are to benefit from the freedom to change to Use Class C3. Where homes in Use Class C4 do not comply with these aspects of Policy D3 we will consider using planning conditions to remove the freedom to change to self-contained homes. The Council has also agreed minimum standards for housing with shared facilities under the Housing Act 2004. Please see Policy H10 (Housing with Shared Facilities) for more information.

Private amenity space and play provision

12.60 The Council will expect developments to include private outdoor amenity space to enhance residents' quality of life and improve health and well-being where appropriate. Gardens, balconies and roof terraces are greatly valued and can be especially important for families. However, the densely built-up nature of the borough means that the provision of private amenity space can be challenging, and the Council will require that the residential amenity of neighbours is preserved.

12.61 In addition to this, where a development generates a need, the Council will seek to secure the suitable provision of play space for children and young people on-site. Play space provision will be expected to comply with London Plan standards and designed to be welcoming, safe, accessible and inclusive for a range of ages and needs, in particular disabled and neurodiverse users.



Extensions and alterations to existing buildings

12.62 Housing in Camden is some of the most expensive to rent and buy in the UK and the shortage of affordable housing is leading to people moving out of Camden – and many people who have grown up in the borough cannot afford to stay, especially when they start a family.

12.63 These issues also mean that some people and families are living in overcrowded and poor quality housing, which has a detrimental impact on mental and physical health, well-being, education and more.

12.64 Extensions and alterations offer the opportunity for residents to improve and expand their homes to respond to changes in circumstance, improve living conditions, make their homes more energy efficient and climate resilient, and ensure their homes meet their needs both now and in the future. They also support the delivery of additional homes in Camden, to help meet our housing need.

12.65 It is however important that extensions and alterations are undertaken in a sympathetic way, to achieve a high quality, sustainable development that responds to and respects the existing building and surrounding townscape (particularly in relation to heritage assets and their setting) and does not harm the amenity of neighbours.

12.66 In some circumstances extensions and alterations can be undertaken without needing to apply for planning permission, as they are considered to be 'permitted development' under national planning rules. Permitted development rights do not, however, generally apply:

- to flats or properties converted into flats;
- to listed buildings;
- where they have been removed (through use of an 'Article 4 Direction'), most likely within Conservation Areas; and
- where they were removed as part of previous planning permissions.

12.67 Whilst most applications for extensions and alterations relate to houses, the Council recognises that residents living in flats or properties converted into flats, may also want to extend or alter their homes. Furthermore, there is also the opportunity to extend and alter existing commercial properties to deliver new homes. The Council is supportive of this, subject to the assessment of the impact, as part of the planning application process, in line with Policy D4 opposite.

Policy D4

Extensions and Alterations to Existing Buildings

A. The Council will support applications for extensions and alterations to existing buildings to deliver additional residential floorspace and/or additional homes, where:

1. the proposed extension is subordinate to the building being extended or altered, in relation to its location, form, footprint, scale, proportions, dimensions and detailing;
2. the proposed extension is designed and constructed to respect and complement the main building and wider townscape, using materials and detailing that are appropriate to the host building in accordance with Policy D1 (Achieving Design Excellence); and
3. the proposed extension is be designed to respect the residential amenity of adjacent properties in accordance with Policy A1 (Amenity).

B. Roof extensions, including mansard roofs, will be supported in principle where they do not adversely impact on designated heritage assets or their setting in accordance with Policy D5 (Historic Environment). Where a roof extension is proposed, this should be consistent with the prevailing form of neighbouring properties and the overall street scene; and designed to maintain safe access and egress for occupiers.

C. Proposals for extensions and alterations to existing buildings will be required to deliver energy efficiency improvements in accordance with Policy CC5 (Sustainable Improvements to Existing Buildings) and CC6 (Energy Use and the Generation of Renewable Energy).

12.68 Works to alter and extend existing buildings to deliver additional residential floorspace and/or additional homes will be supported where they successfully integrate with their surroundings. To achieve this, extensions should be subordinate to the host building, respecting the scale, detailing and materials of both existing buildings and adjoining townscape. Care should always be taken not to disfigure buildings or upset their proportions and to ensure good standards of amenity as set out in Policy A1 (Protecting Amenity).

12.69 Roof extensions can be a practical way to create additional floorspace or deliver additional homes but can have an impact on the amenity of existing residents and the character and appearance of buildings and the wider townscape. A sensitive approach, incorporating the highest standards of design, will therefore be required in line with Policy D1 (Achieving Design Excellence). Roof extensions to listed buildings, or within conservation areas, will be supported provided they do not adversely impact on the designated heritage asset and its setting, in accordance with Policy D5 (Historic Environment) and are line with the policies set out in the Plan.

12.70 Where a proposed roof extension may cause harm to or loss of the significance of a designated heritage asset then evidence should be submitted as part of a Heritage Statement to justify this. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will take into consideration the nature and scale of the proposed development and the public benefits gained through the creation of additional residential floorspace and/or additional homes and weigh these against the harm to the significance of the heritage asset. When assessing proposals we will give significant weight to the need to deliver new homes and create a more family-friendly borough, in addition to the extent to which the proposal delivers measures that respond to the climate and ecological emergency in a sensitive manner.

12.71 Many of Camden's residential areas are characterised by terraced housing of consistent design. On terraced houses of the Georgian and Victorian eras, mansards may often be the most appropriate form of roof extension. However, this will depend on the age and style of the building.

12.72 Where extensions and alterations to existing buildings are proposed the Council will expect developers to demonstrate how they have considered and will implement energy efficient improvements through retrofitting, to make the building more energy efficient and reduce the energy needed to occupy the building. Further guidance on this is set out in Policies CC5 (Sustainability improvements to existing buildings) and CC6 (Energy Use and the Generation of Renewable Energy).

12.73 Where extensions and alterations to existing buildings are proposed, the Council will expect biodiversity enhancements to be delivered commensurate with the scale of the development proposed to mitigate any potential loss in biodiversity, in line with Policy NE2 (Biodiversity). A number of potential measures could be incorporated into schemes, including green roofs, swift bricks, bird and bat boxes and sustainable drainage measures.

Historic environment

12.74 Camden has a rich architectural heritage with many special places and buildings from throughout Camden's history.

12.75 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas.

12.76 The National Planning Policy Framework states that in decision making, local authorities should give great weight to the conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal, the significance of heritage assets and their settings.

Policy D5
Historic Environment

A. The Council will conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments, historic parks and gardens, and locally listed buildings and structures.

B. The Council will support heritage-led regeneration schemes and ensure that the local historic environment is at the heart of place making, to maintain the unique character of our heritage assets and deliver high quality new buildings and spaces which enhance their settings.

Designated heritage assets

C. Proposals which conserve or enhance heritage assets, sustaining and enhancing their significance and making a positive contribution to local character and distinctiveness will be supported. In particular, proposals that bring redundant or under-used buildings and areas, including those on the Heritage at Risk Register, into appropriate and viable use consistent with their conservation, will be encouraged.

D. The Council will not permit development where it will cause total loss of significance, or substantial harm to a designated heritage asset, unless it can be demonstrated that the harm or loss is necessary to provide substantial public benefits that will outweigh the harm or loss caused, or:

1. the nature of the heritage asset prevents all reasonable viable uses of the site;
2. no optimum viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
3. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
4. the harm to, or loss of the asset is outweighed by the benefit of bringing the site back into use.

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, harm will be weighed against the public benefits of the proposals, including, where appropriate, securing the optimum viable use of the heritage asset.

E. The Council will resist any cumulative, incremental, changes to a designated heritage asset, where there is concern that the changes may impact on the significance of the designated heritage asset or may cause harm to the character and appearance of a conservation area.

F. All applications with potential to affect a heritage asset or its setting must be supported by a Heritage Statement.

Policy D5
Historic Environment

Sustainability improvements to designated heritage assets

G. The Council will support proposals to adapt and improve the energy performance of listed buildings, and buildings within conservation areas, to reduce energy demand, strengthen resilience, mitigate the impacts of climate change, and ensure they are adaptable to a changing climate in accordance with the policies set out in the climate change chapter of this Plan.

H. Where a proposal may cause harm to, or loss of the significance of a designated heritage asset then evidence should be submitted as part of a Heritage Statement to justify this.

I. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will take into consideration the nature and scale of the proposed measures and the public benefits gained and weigh these against the harm to the significance of the heritage asset, giving significant weight to measures that respond to the climate emergency in a sensitive manner.

J. Where works are proposed to a listed building, a whole building retrofit approach is recommended.

Conservation areas

K. The Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas in order to maintain their character and setting.

L. The Council will:

1. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
2. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
3. resist development outside of a conservation area that causes harm to the character, appearance, and/or setting of the conservation area;
4. preserve trees and garden spaces which contribute to the character and appearance of a conservation area, or which provide a setting for Camden's architectural heritage; and
5. seek to retain key views into and out of a conservation area.

Policy D5
Historic Environment

Listed buildings

M. To conserve or enhance the borough's listed buildings, the Council will:

1. resist the total or substantial demolition of a listed building and rebuilding behind the façade of a listed building;
2. resist proposals for a change of use, or alterations and extensions, including cumulative or incremental changes to a listed building, where this would cause harm to, or loss of, the significance of the building;
3. resist development within the setting of a listed building that would cause harm to, or loss of, the significance of the building; and
4. require any works to a listed building to be carried out in an appropriate manner, informed by suitably qualified heritage consultants, architects and contractors.

Archaeology

N. The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting.

O. The Council will expect priority to be given to the preservation and management of archaeological remains and their setting in situ, commensurate with the significance of the asset.

P. Where it has been demonstrated to the Council's satisfaction that the preservation and management of archaeological remains in situ is not feasible, the Council will expect the site to be excavated; archaeological remains recorded and removed; a report produced; significant finds archived; and the results disseminated, prior to the commencement of development.

Registered parks and gardens

Q. The Council will protect Registered Parks and Gardens and London Squares in the borough.

R. Proposals which protect and enhance the character, fabric, features, setting, and views into and from the borough's Historic Parks and Gardens and London Squares will be supported.

Non-designated heritage assets

S. The Council will seek to protect non-designated heritage assets. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the asset.

Enhancing the historic environment

12.77 The Council takes a proactive approach to conserving heritage assets. In addition to the application of Local Plan policies we protect the historic environment through the following areas of work:

- Conservation Area Management Strategies: The Council works with Conservation Area Advisory Committees to update and support the implementation of the strategies;
- Heritage at Risk: The Council identifies buildings and structures at risk and proactively seeks to conserve, where required, return them to viable use, including identifying sources of funding;
- Local list of undesignated heritage assets: The Council introduced the local list in 2015 and it will be updated periodically;
- Guidance: The Council has adopted detailed guidance for the preservation of heritage assets in the supplementary planning document Camden Planning Guidance on design, and Retrofitting Planning Guidance (for sustainability measures in historic buildings). The Council updates planning guidance as required;
- Area based work: Conservation and enhancement of the historic environment is a key objective of area action plans and relevant site allocations.

12.78 The Council recognises that development can make a positive contribution to, or better reveal the significance of, heritage assets and will encourage this where appropriate. Responding appropriately to the significance of heritage assets and their setting can greatly enhance development schemes (for example, King's Cross Central).

Designated heritage assets

12.79 Designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas. The Council will apply the policy above and will not permit harm to a designated heritage asset unless the public benefits of the proposal outweigh the harm. Further guidance on public benefits is set out in National Planning Practice Guidance. Any harm to or loss of a designated heritage asset will require clear and convincing justification, which must be provided by the applicant to the Council in a Heritage Statement. In decision making the Council will take into consideration the scale of the harm and the significance of the asset.

12.80 In accordance with the National Planning Policy Framework the Council will only permit development resulting in substantial harm to or loss of a Grade II listed building, park or garden in exceptional circumstances and will only permit development resulting in substantial harm to or loss of a Grade I and II* listed building, Grade I and II* registered park or garden in wholly exceptional circumstances.

Sustainability improvements to heritage assets

12.81 There are many measures that can be applied to traditionally built historic buildings to improve energy performance, reduce energy demand and respond to the climate emergency, while protecting their significance and ensuring their long-term survival. Further information on these measures is set out in Policy CC5 (Sustainability Improvements to Existing Buildings).

12.82 Energy use can be reduced by means that do not harm the fabric or appearance of a building, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and heating and lighting systems, and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics. However, because of the variability in traditional designs and construction methods, it is important that energy improvement proposals demonstrate a 'whole building' approach, one that is based on an understanding of the construction and history of the building, in order to find a solution that sustains heritage significance while also helping to save energy and maintain a healthy indoor environment.

12.83 In assessing applications for retrofitting sustainability measures to historic buildings, the Council will take into consideration the nature and scale of the proposed measures and the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed against the degree to which proposals will change the appearance and/or fabric of the building, taking into consideration the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, energy efficiency planning guidance for conservation areas and on the Historic England website.

Conservation areas

12.84 The Council has prepared a series of conservation area appraisals and management plans. These assess and analyse the character and appearance of each of our conservation areas, and set out how we consider they can be preserved or enhanced. These are material considerations in the determination of planning applications for development in conservation areas.

12.85 When assessing planning applications for development within conservation areas we will consider the importance of preserving or enhancing conservation areas alongside achieving other priorities and delivering wider public benefits. Recognising that many of the Council's Conservation Area Appraisals do not reflect current environmental concerns or support families to alter and extend their homes to meet their needs.

12.86 The character of conservation areas is derived from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing and uses. These elements should be identified and responded to in the design of new development. Design and Access Statements and Heritage Statements should include an assessment of local context and character and set out how the development has been informed by, and responds to, them. A qualified heritage consultant/architect should be engaged to undertake an analysis of the characteristics of the conservation area to form a baseline for design development.

12.87 Due to the urban nature of Camden and its varied topography, the character or appearance of our conservation areas can also be affected by development that is outside of them, but visible from within them. This includes tall or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.

Demolition in conservation areas

12.88 The Council has a general presumption in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area, whether they are listed or not, so as to preserve character and appearance. All proposals for the demolition of buildings should therefore have regard to Policy CC2 (Retention of Existing Buildings).

12.89 The Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless it can be demonstrated that there are circumstances that outweigh the case for retention. The Council can identify an existing building in a conservation area as a positive contributor when considering planning proposals. Applicants will be required to justify the demolition of a building that makes a positive contribution to a conservation area, having regard to Policy CC2 of the Plan, the National Planning Policy Framework, Camden's conservation area appraisals and management strategies and any other relevant supplementary guidance produced by the Council.

12.90 When considering applications for demolition, the Council will take account of the group value, context and setting of buildings, in addition to their quality and appearance as individual structures, and any contribution the building/s make to the setting of other heritage assets. Applications must clearly show which buildings or parts of buildings are to be demolished.

12.91 Where total or substantial demolition is proposed in a conservation area, applicants must demonstrate to the Council's satisfaction that effective measures will be taken during demolition and building works to ensure the structural stability of retained parts and adjoining structures. For planning permission to be granted for a scheme involving demolition there must be detailed plans in place, that have been agreed in writing by the Council, for the suitable redevelopment of the site.

Use

12.92 The range of uses in Camden's conservation areas varies considerably. Changes in patterns of use can erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment. One use that is of particular importance to the character of many of Camden's conservation areas are pubs, especially when they are in located in historic buildings. The Council will protect pubs in accordance with Policy SC7 (Public Houses).

Details

12.93 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooflines and/or roofing materials, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material to match the original as closely as possible. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring buildings and streets to inform the restoration.

Landscape

12.94 Existing gardens, trees and landscaping make a particular contribution to the character of conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.

Listed buildings

12.95 Camden's listed buildings and structures provide a rich and unique historic and architectural legacy. They make an important and valued contribution to the historic environment, and appearance of the borough, and provide places to live, work and study in. Many are well known visitor attractions, cultural and entertainment venues, stations and cherished local and national landmarks. We have a duty to preserve and maintain these for present and future generations.

12.96 The Council has to pay special regard to preserving listed buildings in accordance with Section 16 of the Planning (Listed Buildings and Conservation Areas) Act. Total demolition, substantial demolition and rebuilding behind the façade of a listed building will not normally be considered acceptable. The matters which will be taken into consideration in an application for the total or substantial demolition of a listed building are those set out in the National Planning Policy Framework.

12.97 In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Listed building consent is required for any alterations, including some repairs, which would affect the special interest of a listed building.

12.98 The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it can often extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement, in addition to a historical assessment, with an assessment of impacts on the listed building, in a Heritage Statement.

Access in listed buildings

12.99 Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions, and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.

Archaeology

12.100 Camden has a rich archaeological heritage, comprising both above and below ground remains, in the form of individual finds, evidence of former settlements and standing structures. These remains are vulnerable to modern development and land use. There are currently 17 Archaeological Priority Areas (APAs) in the borough, of which three sites are Tier 1, eleven sites are Tier 2 and three sites are Tier 3.

12.101 Tier 1 is a defined area which is known, or strongly suspected, to contain a heritage asset of national importance (a Scheduled Monument or equivalent), or is otherwise of very high archaeological sensitivity. Tier 2 is a local area within which the Greater London Historic Environment Record (GLHER) holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest. Tier 3 is a landscape-scale zone within which the GLHER holds evidence indicating the potential for heritage assets of archaeological interest. All other areas of the borough are regarded as being in Tier 4. Tier 4 is any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area. However, Tier 4 areas are not necessarily devoid of archaeological interest and may retain some potential unless they can be shown to have been heavily disturbed in modern times.

12.102 The archaeological priority areas provide a general guide to areas of archaeological remains, but do not indicate every find site in the borough. These are based on current knowledge and may be refined or altered as a result of future archaeological research or discoveries.

12.103 It is likely that archaeological remains will be found throughout the borough, both within and outside the archaeological priority areas. Many archaeological remains have yet to be discovered, so their extent and significance is not known. When researching the development potential of a site, developers should, in all cases, assess whether the site is known or is likely to contain archaeological remains. Where there is good reason to believe that there are remains of archaeological importance on a site, the Council will consider directing applicants to supply further details of proposed developments, including the results of archaeological desk-based assessment and field evaluation.

12.104 Scheduled monument consent must be obtained before any alterations are made to scheduled ancient monuments. Camden has only one scheduled ancient monument: Boadicea's Grave in Hampstead Heath.

12.105 If important archaeological remains are found, the Council will seek to ensure that acceptable measures are taken to preserve them and their setting. There will usually be a presumption in favour of in situ preservation of remains and, if important archaeological remains are found, measures should be adopted to allow the remains to be permanently preserved in situ. Where it is demonstrated that in situ preservation is not feasible, no development shall take place until satisfactory excavation and recording of the remains has been carried out on site, and subsequent analysis, publication and archiving undertaken, by an archaeological organisation approved by the Council and conducted to standards outlined by the Chartered Institute for Archaeology, as well as the Greater London Archaeology Advisory Service (GLAAS) Standards and Guidance for Archaeological Investigation in London.

12.106 The Council will apply conditions to secure the implementation of written schemes of investigation prior to the commencement of demolition/alterations, where appropriate. The information obtained through the recording should be made public, through an appropriate level of publication, and a deposit copy provided to the Greater London Historic Environment Record. The archive should then be deposited in a publicly accessible location, for future research.

12.107 The Council will consult with, and be guided by, Historic England and GLAAS on the archaeological implications of development proposals. The Greater London Historic Environment Record, maintained by Historic England, contains further information on archaeological sites in Camden.

Registered parks and gardens and London squares

12.108 Camden contains 14 registered parks and gardens, as identified by Historic England. There are also 53 London squares in the borough protected by the London Squares Preservation Act 1931. The Council will encourage the management of registered parks and gardens and London squares to maintain, and where appropriate, enhance their value and protect their setting. The Council will consult with Historic England over proposals affecting these parks and gardens. We also encourage the restoration and management of registered parks and gardens and London squares to enhance their heritage value.

Non designated heritage assets

12.109 The borough also has many attractive, historic, locally significant buildings and features which contribute to the distinctiveness of local areas, but which are not formally designated. The National Planning Policy Framework identifies these features as non-designated heritage assets. Non-designated heritage assets may either be identified as part of the planning process or on Camden's Local List. Camden's Local List identifies historic buildings and features that are valued by the local community and that help give Camden its distinctive identity but are not already designated in another way (for example, by being a listed building). When planning permission is required for any proposal that directly or indirectly affects the significance of a non-designated heritage asset (either on the Local List or not) then the Council will treat the significance of that asset as a material consideration when determining the application. The criteria for local listing is set out in our Camden Planning Guidance on Design. The Local List is available at www.camden.gov.uk/local-list.

Basements

12.110 Basements are often included in major developments, especially in the central London part of Camden and used for various purposes including commercial, retail and leisure uses, servicing and storage. They can also provide additional space in homes. However, the impacts of basement construction on residents living in close proximity to the development site can be considerable.

12.111 Basement development, and other development that involves excavation, changes the ground and water conditions of the area and can potentially lead to ground instability or flooding, and have significant construction impacts, due to the need to remove soil and the general complexities of excavation. The Council recognises the need to protect the environment and adjoining neighbours, properties and buildings from these impacts.

12.112 When Policy D6 refers to basement development this includes basements, extensions to existing basements, lightwells and other underground development.

12.113 A basement is a floor of a building which is partly or entirely below ground level. A ground or lower ground floor with a floor level partly below the ground level (for example on a steeply sloping site) will therefore generally be considered basement development.

12.114 The following policies in this Local Plan are also relevant to basement development and will be considered when assessing basement schemes: Policy SC4 (Open Space); Policy NE2 (Biodiversity); Policy D1 (Achieving Design Excellence); Policy D5 (Historic Environment) and Policy CC10 (Flood Risk).

Policy D6
Basements

A. The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

1. neighbouring properties;
2. the structural, ground, or water conditions of the area;
3. the character and amenity of the area;
4. the architectural character of the building; and
5. the significance of heritage assets and their settings.

B. In determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and, where appropriate, a Basement Construction Plan.

C. The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

1. not comprise of more than one storey;
2. not be built under an existing basement;
3. not exceed the footprint of the host building in area, except for works to create a lightwell or access to the basement;
4. be set back from neighbouring property boundaries where a new access or lightwell is being created; and
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.

D. Exemptions to C(1) to C(5) above may be made on large comprehensively planned sites.

Policy D6
Basements

E. The Council will require applicants to demonstrate that proposals for basements;

1. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
2. avoid adversely affecting drainage and run-off or causing other damage to the water environment;
3. have sought to reduce the embodied carbon of the basement. The Council will request the applicant to provide data showing the upfront embodied carbon of the basement proposal;
4. avoid cumulative impacts;
5. do not harm the amenity of neighbours;
6. do not harm the appearance or setting of the property or the established character of the surrounding area;
7. protect important archaeological remains; and
8. ensure impacts on any green/garden space or trees are minimised and where residual impacts do arise that this is addressed through appropriate restoration and replacement, prioritising biodiversity enhancements where possible.

F. The Council will:

1. not permit basement schemes involving self-contained flats or bedrooms, bathrooms or kitchens in basements in flood risk areas; require a positive pump device to be installed in basements;
2. generally require a Construction Management Plan for basement developments; and
3. expect developers to offer security for expenses for basement development to adjoining neighbours given the complex nature of basement development.

Managing basement development

12.115 Given its potential impacts, it is important that any basement development is carried out in a way that does not cause harm to the amenity of neighbours; affect the stability of buildings; cause drainage or flooding problems; or damage the character of areas, the natural environment or neighbouring infrastructure.

Use of basement impact assessments

12.116 Information submitted with a basement application must be contained within a Basement Impact Assessment which is specific to individual sites and particular proposals. The Basement Impact Assessment (BIA) must be carried out by appropriately qualified professionals. Basement Impact Assessments are to include geotechnical, structural engineering, and hydrological investigations and modelling to ensure that basement developments do not harm the built and natural environment or local amenity. Basement Impact Assessments must be prepared according to the specifications set out in our Camden Planning Guidance on Basements and the Camden Geological, Hydrogeological and Geological Study (ARUP 2010).

12.117 The level of information required will be commensurate with the scale and location of the scheme. All schemes will be expected to provide evidence against each of the considerations in Policy D6 (Basements). Schemes will also be expected to submit information which relates to any specific concerns for that particular scheme or location (for example any history of flooding at the site or in the vicinity of the site, the presence of underground watercourses, proximity to water bodies such as the ponds on Hampstead Heath, structural instability of the development or of neighbouring properties, or unstable land).

12.118 Where hydrological and structural reports are required, they should be carried out by independent professionals (for example Chartered Structural Engineers) with appropriate qualifications, as set out in Camden Planning Guidance on Basements.

12.119 In order to provide the Council with greater certainty over the potential impacts of proposed basement development, we will generally expect an independent verification of Basement Impact Assessments, funded by the applicant. The circumstances where verification is required include:

- where a scheme requires applicants to proceed beyond the screening stage of Basement Impact Assessment;
- where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow;
- where there is conflicting evidence; or
- for any other basement applications where the Council feels that independent verification would be appropriate.

12.120 Basement Impact Assessments must contain a non-technical summary of the evidence that applicants have gathered against each stage of the assessment. This should be presented in a format which can be fully understood by those with no specialist technical knowledge.

Burland scale

12.121 Where a Basement Impact Assessment identifies risk of damage to properties by subsidence this risk should be described using the Burland Scale, in accordance with the details set out in Camden Planning Guidance on Basements. The Burland Scale methodology has been adopted for projects internationally and has been used by the Building Research Establishment and the Institution of Structural Engineers. The classification system of the scale is based on the ease of repair of visible damage. Subsidence is only one element in the many potential impacts assessed in a BIA and other methods will be employed when describing these other impacts.

12.122 In the Burland Scale the damage to properties caused by subsidence may be considered in three broad categories:

- visual appearance or aesthetics;
- serviceability and function; and
- stability.

12.123 Burland Scale categories 0, 1, and 2 refer to (i) aesthetic damage, categories 3 and 4 relate to (ii) serviceability and function, and 5 represents damage which relates to stability.

12.124 Burland states that it is a major objective of design and construction to maintain a level of risk to buildings no higher than category 2, where there is only risk of aesthetic damage to buildings (see Burland, J. "The assessment of the risk of damage to buildings due to tunnelling and excavations", Imperial College London, 1995). However, the Council considers that neighbouring residential properties are particularly sensitive to damage, where relatively minor internal damage to a person's home can incur cost and considerable inconvenience to repair and redecorate. Applicants must therefore demonstrate in the Basement Impact Assessment that the basement scheme has a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight'.

Embodied carbon impact of basements

12.125 The carbon intensity of basement construction can be high. In line with Policy CC4 (Minimising Carbon Emissions), the Council will expect schemes to include measures to reduce the embodied carbon impact of a basement's construction. The engineer's structural report should set out what steps have been taken to reduce the embodied carbon content of the basement, with supporting calculations provided. This will not apply to developments solely involving a lightwells or new access.

Cumulative impact of basement schemes

12.126 The cumulative effect of several underground developments can be more significant than the impact of a single basement. The impacts include changes to ground water flow, land stability, surface water flow, and flooding. Basement Impact Assessments must consider the potential wider impacts of basement schemes and the potential cumulative impact of other basement schemes in the area. Basement Impact Assessments must identify all relevant basements in the neighbouring area, including their extent and ground conditions and make an assessment of the combined effect of underground development with all nearby basements considered together.

Demolition and construction

12.127 The demolition and construction phases of a development can have an impact on amenity, and this can be a particular issue for basements, especially when they are located in proximity to residential properties. Construction impacts (including noise) are also controlled by non-planning legislation, in particular the Control of Pollution Act, with traffic impacts considered under relevant highways legislation. Regard should also be had to construction hours set out in adopted neighbourhood plans.

12.128 The Council will seek to minimise the disruption caused by basement development and will generally require Construction Management Plans to be submitted with applications. A Construction Management Plan can be used to establish a community working group involving neighbouring residents to discuss, advise and make recommendations, before and during the construction period. Construction Management Plans should be based on the Construction Management Plan Proforma which is available for download from the Council's website. Please see Camden Planning Guidance on Basements for further information. The Council has also set out Minimum Requirements that contractors are expected to meet, addressing matters such as working hours, noise, vibration and community liaison and a detailed Guide for Contractors Working in Camden with the aim of ensuring that works are undertaken in the most considerate way. Developers will be expected to have due regard to this.

Basement construction plans

12.129 To ensure that basement construction is undertaken without causing damage to neighbouring properties and the water environment the Council may require the developer to provide a Basement Construction Plan in some circumstances. A Construction Plan may be required when a Basement Impact Assessment shows acceptable estimated effects, but a particular construction methodology needs to be applied to ensure there is no damage to neighbouring properties. If a Basement Construction Plan is required, this will be identified in the independent assessment of the Basement Impact Assessment. Basement Construction Plans will be secured by planning obligation.

12.130 A Basement Construction Plan sets out detailed information relating to the design and construction of the basement and provides a programme of measures to be undertaken by the owner with the objective of maintaining the structural stability of the property and neighbouring properties. The developer must also ensure that throughout the construction phase a suitably qualified engineer from a recognised professional body is engaged to monitor, inspect and approve the construction works. The detailed requirements of a Basement Construction Plan are set out in Camden Planning Guidance on Basements and developers will be expected to have due regard to this.

Size of basements

12.131 In addition to protecting against flooding, ground instability and damage to neighbouring buildings as set out above, the Council will also 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. 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.

12.132 Works involving the creation of new 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.

12.133 Exceptions to criteria C (1)-(5) in Policy D6 (Basements) may apply on large comprehensively planned sites. For the purposes of this policy, large comprehensively planned sites are:

- new major developments, for example schemes which comprise 1,000 sqm additional non-residential floorspace or 10 or more additional dwellings;
- large schemes located in a commercial setting; or
- developments the size of an entire or substantial part of an urban block.

Flood risk

12.134 The National Planning Policy Framework (NPPF) states that "inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk". In accordance with Policy CC10 (Flood Risk) developers will be expected to have due regard to the borough's Strategic Flood Risk Assessment, information published by the Council on previously flooded streets and the Environment Agency's risk of flooding from surface water map to identify whether a site is at risk of flooding from any source.

12.135 Where a site is identified as being at risk of flooding the Council will not permit self-contained flats or bedrooms, bathrooms or kitchens in basements. This is due to the risk to life (bedrooms), the risk of sewer surcharge (kitchens and bathrooms/WCs) as well as the possibility of the basement being used to provide a self-contained home. Access to a basement must be located above the predicted flood level.

12.136 We will require the submission of a development-specific flood risk assessment with applications for basements within areas identified as being at risk from flooding (including areas with high risk of sewer flooding), unless it can be demonstrated to the Council's satisfaction that the scale of the scheme is such that there is no, or minimal, impact on drainage conditions. Basements and lower ground floors are at particular risk from sewer surcharge and backflow as their floors will often be below sewer level. We will therefore require basements to be fitted with a positive pump device to ensure they are adequately protected from the risk of sewer flooding.

12.137 Where the construction of a basement would reduce the area of permeable surface on the site, a Sustainable Drainage System will be required to mitigate any harm to the water environment. Further guidance on sustainable drainage is contained in Camden Planning Guidance on Water and Flooding and developers will be expected to have due regard to this.

12.138 Some parts of Camden contain unusual and unstable subsoils, along with many underground streams and watercourses, making drainage and structural safety key concerns (for example around Hampstead Heath). In such areas, applications for basement developments may be required to show through hydrological modelling whether it will be possible to prevent any significant harm from changes to groundwater levels or flow through the inclusion of drainage systems.

Protection of gardens and trees

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. Cumulatively, gardens can have a significant role in providing infiltration during rainfall events and are a rich resource for wildlife and biodiversity. Basement development should be planned to minimise disturbance to gardens 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.

Listed buildings

12.140 Basement development underneath a listed building can harm the fabric, structural integrity, layout, inter-relationships and hierarchy of spaces and architectural features of the building. The addition of a floor level beneath the original lowest floor level of a listed building (basement, cellar, or vault) may affect the hierarchy and historic integrity of the floor levels within the building. The development of a basement beneath a listed building can also necessitate the removal of significant parts of the original structure and fabric.

12.141 The Council will only permit basements where they do not cause harm to the significance of a listed building or its garden. Listed buildings often form an intrinsic element of the character of conservation areas and therefore basement development which harms the special architectural and historic interest of a listed building is also likely to fail to preserve or enhance the character or appearance of the conservation area in which it is located. Further details on the Council's approach to preserving heritage assets are set out in Policy D5 (Historic Environment).

Lightwells

12.142 Where basements and visible lightwells are not part of the prevailing character of a street, new lightwells should be discreet and not harm the architectural character of the building, the character and appearance of the surrounding area, or the relationship between the building and the street. In situations where lightwells are not part of the established street character, the characteristics of the front garden or forecourt will be used to help determine the suitability of lightwells.

12.143 In plots where the front garden is quite shallow, a lightwell is likely to consume much, or all, of the garden area. This will be unacceptable in streets where lightwells are not part of the established character and where the front gardens have an important role in the local townscape.

12.144 Lightwells to the side or rear of a property should be set away from the boundary of a neighbouring property. Excessively large lightwells will be resisted.

Party Wall Act and security for expenses

12.145 The Council expects developers to offer security in all instances where basement schemes have a risk of causing damage to neighbouring property. Building owners are required to meet a number of obligations under the Party Wall Act 1996 where there is excavation near a neighbouring building. These obligations include serving advanced notice of works, stating whether the foundations of the adjoining property will be strengthened or safeguarded, and providing plans and sections. Under the Party Wall Act adjoining owners may request the building owner to provide a bond or insurances to provide security in the event of a dispute. Security bonds can be provided either as part of a party wall agreement or as a separate private arrangement between the developer / owner and the neighbour.

Advertisements and Signage

12.146 This policy applies to all advertisements requiring advertisement consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Certain types of advertisements do not require advertisement consent and are regarded as having 'deemed consent' as they meet the specifications set out in the regulations.

12.147 Information on what types of advertisements require consent is principally set out in The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

12.148 Advertisements are only controlled in respect to their effect on amenity and public safety. Further guidance on Camden's approach to advertisements is available in the Camden Planning Guidance on advertisements and developers will be expected to have due regard to this.

Policy D7
Advertisements and Signage

A. The Council will require advertisements and signage to preserve or enhance the character of their setting and host building. Advertisements and signage must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.

B. The Council will support advertisements and signage that:

1. do not impact upon public safety;
2. preserve the character and amenity of the area;
3. preserve or enhance heritage assets and conservation areas;
4. do not contribute to an unsightly proliferation of signage in the area;
5. do not contribute to street clutter in the public realm;
6. do not cause light pollution to nearby residential properties or wildlife habitats; and
7. do not have flashing illuminated elements.

C. The Council will resist advertisements on shopfronts that are above fascia level or ground floor level, except in exceptional circumstances.

D. Shroud advertisements, digital advertisements, banners, hoardings, billboards, and large outdoor signboards are subject to further criteria as set out in our supplementary planning document Camden Planning Guidance on advertisements. Developers will be expected to have due regard to this.

Character and amenity

12.149 Advertisements and signs should be designed to be complementary to and preserve the character of the host building and local area. The size, location, materials, details and illumination of signs must be carefully considered. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment. The Council will resist advertisements where they contribute to or constitute visual street clutter, or where there is an unsightly proliferation of signage in the area.

Heritage and conservation areas

12.150 Advertisements in conservation areas and on or near listed buildings require particularly detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.

Street furniture and the public realm

12.151 Street furniture includes objects placed on the street including traffic signs and signals, benches, street names, CCTV cameras, lighting, cycle parking, guardrails, bollards and bus shelters. The Council aims to reduce visual street clutter, reducing the number of objects on the street, rationalising their location and limiting the palette of materials. Free standing signs and signs on street furniture will not be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway.

Illumination and light pollution

12.152 Advertisements should not become unduly dominant in the street scene, cause light pollution that disturbs residents at night, cause light pollution to wildlife habitats, or cause safety hazards to drivers. To achieve these aims, consideration should be given to the intensity of illumination, the surface area to be illuminated, and the positioning and colours of advertisements. The type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon, etc.) should be determined by the design of the building. Illuminated signs, both internal and external, should not be flashing or intermittent.

12.153 The illumination levels of advertisements should be in accordance with the guidance set by the Institute of Lighting Engineers PLG05 The Brightness of Illuminated Advertisements.

Impact on safety

12.154 Advertisements will not be considered acceptable where they impact upon public safety, including when they:

- obstruct or impair sight lines to road users at junctions and corners;
- reduce the effectiveness of a traffic sign or signal;
- result in glare and dazzle or distract road users;
- distract road users, for example because of their unusual nature;
- disrupt the free flow of pedestrian movement; or
- endanger pedestrians forcing them to step on to the road.

Placement of advertisements on shopfronts

12.155 Generally, shopfront advertisements will only be acceptable at the ground floor level, at fascia level or below. Fascia in this context refers to the signboard on the upper part of a shopfront showing the name of the shop. Advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties.

Discontinuance

12.156 The Council takes a proactive approach to preserving or enhancing the townscape and public realm. Where existing advertisements with deemed consent are considered to harm the character and amenity of a building or local area the Council will, where appropriate seek removal of these advertisements, which may include the serving of discontinuance notices.

Estate agent boards

12.157 A certain number and size of estate agent boards can be erected on properties without the benefit of advertisement consent. Areas may be exempted from this deemed consent under Regulation 7 of the 1992 Regulations. In these areas no boards will be granted advertisement consent by the Council because of their effect on visual amenity, except in exceptional circumstances. Please refer to the Camden website for the list of exempted areas.

Shopfronts

12.158 Shopfronts contribute greatly to the character of Camden's centres and their distinctiveness.

12.159 Most of Camden's town and neighbourhood centres date back to the 19th Century or earlier, having developed from commercial activities that first took place within dwellings, although there are some significant 20th Century shopping parades.

12.160 The retention of historic shop fronts and the provision of well-designed new shopfronts create a welcoming environment and attractive high streets. The Council will determine applications for new shopfronts in accordance with Policy D8 below.

Policy D8
Shopfronts

A. The Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features.

B. When determining proposals for shopfront development the Council will consider:

1. the design of the shopfront or feature to ensure that the proportion, scale, style, detailing, colour and materials proposed make a positive contribution to the building and its context;
2. the existing character, architectural and historic merit and design of the building and its shopfront;
3. the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;
4. the general characteristics of shopfronts in the area;
5. community safety, lighting and the contribution made by shopfronts to natural surveillance. Solid shutters will only be considered to be acceptable in exceptional cases; and
6. the degree of accessibility to all users.

C. The Council will resist the removal of shop windows without a suitable replacement and will ensure that where shop, service, food, drink and entertainment uses are lost, a shop window and visual display is maintained.

D. Where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention. Where a new shopfront forms part of a group where original shopfronts survive, its design should complement their quality and character.

Protecting existing shopfronts

12.161 Shopfronts form an essential part of the character and attractiveness of many areas in Camden, in particular the borough's centres, and contribute to the creation of vibrant streets and public spaces. The Council will seek to protect existing shopfronts that make a significant contribution to the appearance and character of an area, for example through their architectural and historic merit. We will also consider the need to keep the appearance of the shopfront, taking into account the quality of its design, its historic importance and its location. Good examples of shopfronts should be retained wherever possible.

12.162 A number of Camden's centres lie within conservation areas. The Council has prepared conservation area statements, appraisals and management strategies for these which set out detailed information on the area and its character and the Council's approach to their preservation and enhancement, including, where relevant, shopfronts.

Design of new shopfronts

12.163 The quality of shopfronts and the way in which they relate to their surroundings make an important contribution to the character and attractiveness of an area. The Council will therefore seek to ensure that new shopfronts are of a high quality and are sensitive to the area in which they are located. Where units contain shops or other town centre uses, shop frontages should be largely glazed to maintain a window display, rather than creating a solid frontage (including obscured glass), which will be discouraged.

12.164 The Council considers that the attractiveness of shopfronts can usually best be maintained by taking inspiration from the architecture of the building and neighbouring premises and reflecting the general scale and pattern of shopfront widths in the area. New shopfronts should contribute towards the maintenance of a cohesive streetscape appearance, retain a consistent building line and contribute to the character and attractiveness of the centre they are located in. As shopfronts are seen at close quarters, the detailing, type and quality of materials, execution and finishes are very important. Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all.

Replacement shopfronts

12.165 If a shopfront is replaced or altered, the design should respect the characteristics of the building and, where appropriate, shopfront windows and framework features, such as pilasters, fascias and console brackets, should be retained or restored. Careful consideration will be given to proposals for excavating or re-opening lightwells in front of shopfronts, particularly those in a group, as they can affect the cohesiveness of a frontage.

12.166 Folding or opening shopfronts will not generally be acceptable, as they can create a void at ground level that can harm the appearance of a building and can also have a negative impact on local amenity, for example in terms of noise and disturbance.

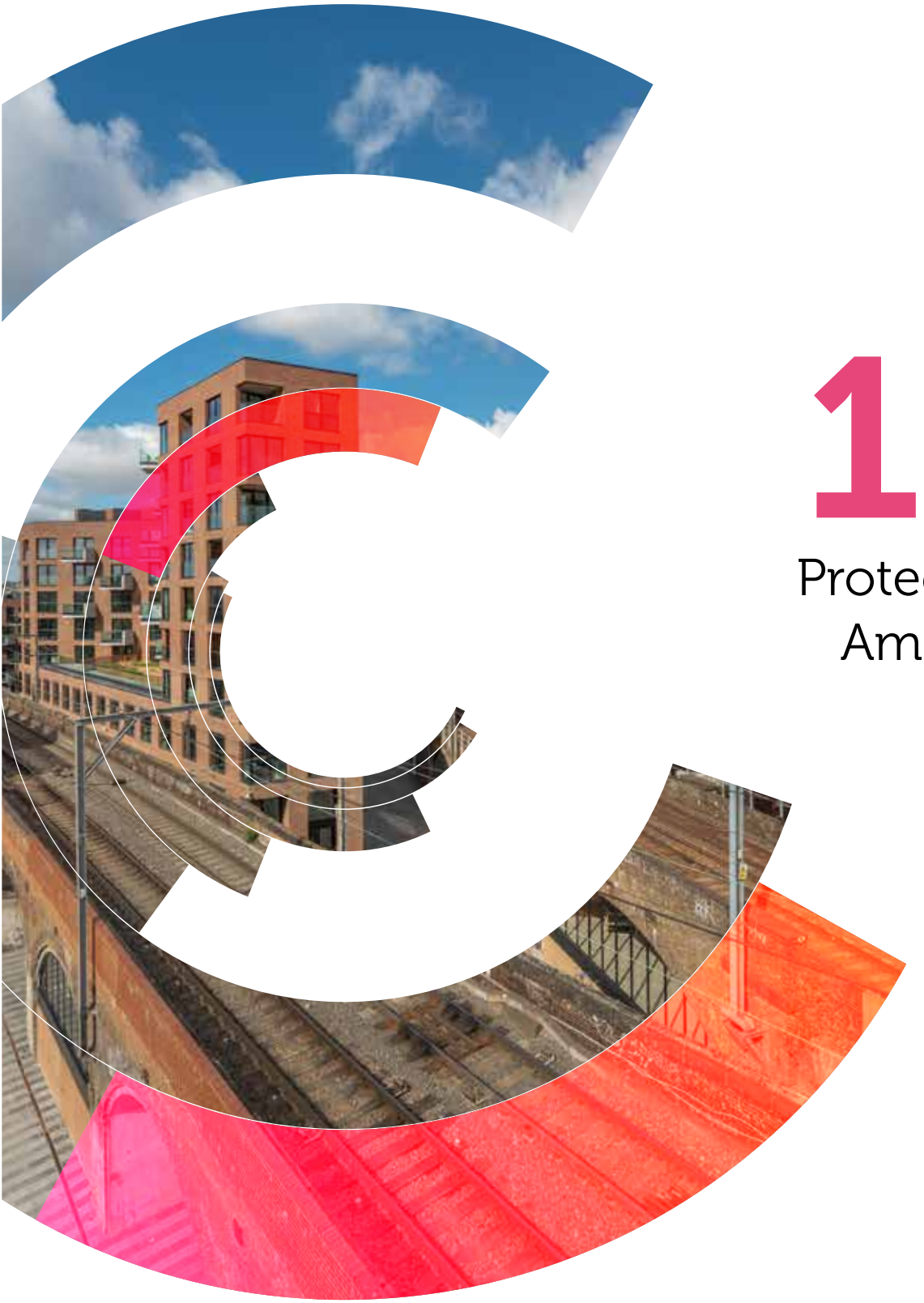
Shop windows

12.167 Shop windows provide views into and from premises and can help bring activity and enhance feelings of security by providing natural surveillance. Displays in shop windows can add to the attractiveness of a premises and the vitality and attraction of the centre. Fully opening shop windows will generally not be supported as they can harm the appearance of a building and can have a negative impact on local amenity. Security features associated with shop window displays should be internal, retractable when the shop is open, and have a degree of transparency, in order to avoid harming the appearance of shop premises and creating clutter. Solid shutters are only considered to be acceptable in exceptional cases as they are unsightly and can generate feelings of insecurity in those walking by, hide internal intruders and encourage graffiti.

12.168 Lighting from shop windows can help to increase security after dark. The Council may therefore seek the maintenance of some shopfront lighting overnight, where appropriate, particularly in areas identified as having high levels of crime. However, this lighting should be well designed, so it does not cause light pollution.

12.169 The Council discourages shop window displays and graphics that completely obstruct views into the shop (for example vinyl graphics applied to the window). The layout of shop units should be designed to overcome the need for excessive window graphics, for example to hide shelving. Camden Planning Guidance on Design provides more detail on the Council's approach to the design of shopfronts and developers will be expected to have due regard to this.

12.170 The Council also discourages unsightly external installations to commercial premises. Any features such as ventilation systems, security cameras, lighting and other visible additions should be incorporated into well-designed proposals.



13

Protecting Amenity

13 Chapter

Protecting amenity

13.1 Standards of amenity (the features of a place that contribute to its attractiveness and comfort) are significant factors in the health and quality of life of the borough's residents, families, workers, and visitors, and are fundamental to Camden's appeal and success.

13.2 Camden's inner London location, he proximity of various uses, and the presence of major roads and railways means that amenity is a particularly important issue within the borough.

13.3 Policy A1 therefore seeks to ensure that standards of amenity are protected for all. Other policies within the Plan also contribute towards protecting amenity by setting out our approach to specific issues, such as Policy A4 (Noise and Vibration) and Policy A3 (Air Quality).

Policy A1
Protecting Amenity

A. The Council will seek to protect the quality of life of existing and future occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. The Council will:

1. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
2. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
3. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network;
4. require sensitive developments to mitigate the impact of, and protect occupiers against, existing sources of noise and other nuisance generating activities in accordance with the Agent of Change principle; and
5. require mitigation measures where necessary.

B. When assessing planning applications, the factors that the Council will consider include:

1. privacy, overlooking and outlook;
2. sunlight, daylight and overshadowing;
3. impacts of artificial lighting levels;
4. transport impacts, including the impact on the public transport network and the need for Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
5. the cumulative impacts of the construction phase, including potential impact on, and damage to, highway assets, and the need for Construction Management Plans. Construction Management Plans are expected for all major applications and on smaller schemes where appropriate;
6. noise and vibration levels;
7. odour, fumes and dust;
8. microclimate;
9. contaminated land; and
10. impact upon water and wastewater infrastructure.

13.4 Protecting amenity is a key part of successfully managing Camden's growth and ensuring its benefits are properly delivered. The Council will expect all forms and scales of development to avoid harmful effects on the amenity of existing and future occupiers, nearby properties and the wider community, and take appropriate measures to mitigate potential impacts on amenity where necessary.

Privacy, overlooking and outlook

13.5 A development's impact upon privacy, overlooking and outlook will be influenced by its design and layout. These issues can affect the amenity of existing and future occupiers. The Council will expect that these elements are considered at the design stage of a scheme to prevent potential harmful effects from the development on occupiers and neighbours. Further detail can be found in our Camden Planning Guidance on Amenity and developers will be expected to have due regard to this.

Sunlight, daylight and overshadowing

13.6 Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable rooms, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2022 edition). Further detail can be found in our Camden Planning Guidance on Amenity and developers will be expected to have due regard to this.

13.7 All major applications (10 residential units or more or for sites of 1,000 sqm or more) and any other proposal with potential to negatively impact on the existing levels of daylight/sunlight at other land uses near the application site, including gardens and amenity spaces, will be expected to be accompanied by a Daylight and Sunlight Assessment prepared in line with the methods described in the Building Research Establishment's (BRE) "Site layout planning for daylight and sunlight: A guide to good practice" 2011.

Artificial lighting levels

13.8 Camden's dense character means that light pollution can be a bigger problem in the borough than in lower density areas where uses are not so close together. Artificial lighting should only illuminate the intended area and not affect or impact on the amenity of neighbours and wildlife.

13.9 Developments in sensitive areas, such as those adjacent to sites of nature conservation, and proposals involving the installation of external lighting or floodlighting should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife, demonstrated through the submission of a Lighting Assessment.

13.10 For further information on examples of sources of artificial light nuisance, where planning permission is required, the information required for planning applications and what should be considered when designing lighting, please see our Camden Planning Guidance on Amenity. Developers will be expected to have due regard to this.

Transport impacts

13.11 Where the transport implications of proposals are considered to be significant, we will require a full Transport Assessment to examine the impact on transport movements arising from the development. In some circumstances where the transport implications are less severe, but still significant, we would require a Transport Statement rather than a full Transport Assessment. For smaller applications that do not require a full Transport Assessment or Transport Statement, some information will still need to be submitted as part of the planning application process and this should be supplied either as part of a supporting transport note, or incorporated into the Design and Access Statement. Further guidance on this is set out in the Transport Chapter of the Local Plan (see policies T1 (Safe, Healthy and Sustainable transport) and T6 (Sustainable Movement of Goods, Services and Materials) and Camden Planning Guidance on Transport and developers will be expected to have due regard to this.

13.12 The Council will consider information received within Transport Assessments, Travel Plans and Delivery and Servicing Management Plans to assess the transport impacts of development. In instances where existing or committed capacity cannot meet the additional need generated by the development, the Council will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts.

13.13 Proposals should make appropriate connections to highways and street spaces, in accordance with Camden's road hierarchy and Transport for London's Street Type Framework, and to public transport networks. Any development or works affecting the highway will also be expected to avoid disruption to the highway network, particularly emergency vehicle routes, and avoid creating a shortfall to existing on-street parking conditions, or amendments to Controlled Parking Zones. To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever possible, in accordance with Policy T6 (Sustainable Movement of Goods, Services and Materials).

13.14 Highway safety, with a focus on vulnerable road users should also be considered, including provision of adequate sightlines for vehicles leaving the site. Development should also address the needs of vulnerable road users.

13.15 Highway works connected to development proposals will be undertaken by the Council at the developer's expense, to ensure that highway works, maintenance and materials adopted by the Council are constructed to an appropriate standard. This includes highway works that form part of a planning approval appropriate for adoption, including the design and implementation of new routes to be adopted, owned and managed by the relevant Highway Authority. Development requiring works to the highway following development will be secured through a planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces. Separate arrangements will apply to any works on roads managed by Transport for London.

Construction management plans

13.16 The Council will expect all major planning applications to produce a Construction Management Plan (CMP). The need for a CMP for minor developments will be considered on a case-by-case basis, depending on the nature of the proposed construction works, the site location and surrounding context. CMPs should be submitted at the earliest opportunity in the planning application process and include significant input from the contractors appointed to undertake the work. Construction Management Plans will be secured via planning obligations and should, at the very latest, be submitted well before a development commences.

13.17 As part of the preparation of a CMP, the Council require applicants to identify the potential impacts of the planned construction activity and to propose appropriate mitigation measures. A neighbourhood consultation process must also be undertaken prior to submission of the first draft of the Construction Management Plan.

13.18 The level of detail provided in a CMP should be proportionate to the scale and/or complexity of the development. To assist developers in providing the right information, the Council has created a Construction Management Plan Pro-forma which is tailored towards the specific needs of the borough and can be found on the Council's website.

13.19 For major applications and developments that the Council consider would have a significant impact on amenity, a Construction Working Group should be established to discuss, advise and, where appropriate, make recommendations to the developer in relation to the build and preparation of the Construction Management Plan.

13.20 The Council will also expect developers to sign up to the Considerate Constructors Scheme and Construction Logistics and Community Safety (CLOCS) monitoring, and adhere to the Guide for Contractors Working in Camden. Construction implementation contributions and monitoring fees will be applied to each development. For developments raising particularly complex construction or management issues, the Council will seek a Construction Management Bond, secured through a planning obligation and paid to the Council by the developer. This will be returned on completion of the works providing there has been no breaches of the Construction Management Plan.

13.21 The Council inspects Construction Management Plan sites through to completion and it is a requirement that Council officers are given access to development sites when requested for planned or unannounced inspections. Further information on Construction Management Plans is contained in Camden Planning Guidance on Amenity and developers will be expected to have due regard to this.

Noise and vibration

13.22 Noise and vibration can have a significant effect on the environment, and on the health and quality of life enjoyed by communities and individuals. Development coming forward in Camden should therefore have regard to Policy A4 (Noise and Vibration), Camden Planning Guidance on Amenity and the London Plan Policy on agent of change.

13.23 Developers will also be required to comply with the Control of Pollution Act 1974 Sections 60 and 61 for the control of noise and vibration arising from construction activities.

Odours, fumes and dust

13.24 Odours, fumes and dust can be generated from commercial cooking, industrial process and construction and demolition which have the potential to cause a range of health problems, including respiratory diseases.

13.25 We will require all development likely to generate nuisance odours to install appropriate extraction equipment and other mitigation measures. These should be incorporated within the building where possible. External extraction equipment and ducting should be sited sensitively, particularly on listed buildings and within conservation areas. Further details can be found in Camden Planning Guidance on Design and Camden Planning Guidance on Amenity, and developers will be expected to have due regard to this.

13.26 The Council will limit the disturbance from dust due to construction and demolition by expecting developers and their contractors to follow the Greater London Authority's Control of Dust and Emissions During Construction and Demolition supplementary planning guidance. Details of how these measures will be implemented should be provided in a Construction Management Plan. Further information regarding the management of dust can be found within Policy A3 (Air Quality).

Microclimate

13.27 Some developments can alter the local climate in the vicinity of the building. Micro-climate refers to local conditions including wind, temperature, overshadowing, access to daylight and general comfort. In particular high-rise buildings can cause high wind velocities at pedestrian level which can create an uncomfortable environment and can even be dangerous. Therefore, the design of a building should not only focus on the building envelope and on providing good indoor environment, but should also consider the effect on the surrounding outdoor environment.

13.28 Developments with potential to change their local environment include:

- new or modified tall buildings or buildings significantly higher than any surrounding building;
- significant modifications to the built environment in areas of quantifiable and recognised existing wind nuisance;
- major proposals adjacent to or incorporating a significant area of public or outdoor space;

- developments with a large amount of glazing or dark masonry surfaces; or
- a combination of new or modified buildings that cumulatively, will significantly change the wind environment.

13.29 These developments will therefore be expected to submit a statement demonstrating how the design has considered local conditions. Further detail can be found in our Camden Planning Guidance documents on Sustainability and Amenity and developers will be expected to have due regard to these.

Contaminated Land

13.30 Development on contaminated land can expose people to a wide range of potential health risks. Examples of sites that may have contaminated land include those that have been used for vehicle repair, industrial processes and petrol stations. 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 assessments and take appropriate remedial action to the Council's satisfaction if required.

13.31 Developers should follow the risk management framework provided in the Environment Agency's Land Contamination: Risk Management guidance, which helps to identify and manage the risks of land contamination. This includes a Preliminary Risk Assessment, which is a desk-top study used to identify contamination risks posed at a development site. The Assessment should identify all potential sources of contamination (past and present) and determine the contamination risk at a site and the potential impact to site users. This process should include analysis of historical and geological map data to identify previous uses of the site and environmental data on ground conditions, hydrology and relevant local features.

13.32 Remedial action is particularly important in developments where people will have access to the ground for gardening, play or planting food for consumption. Please refer to our Contaminated Land team and our Camden Planning Guidance on Amenity for further information.

Water and wastewater infrastructure

13.33 The Council will work with water and sewerage providers to ensure that there is adequate water and wastewater infrastructure serving developments likely to put pressure on existing water and wastewater infrastructure. Developers may be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to reductions in water pressure, sewer flooding or overloading of existing water and wastewater infrastructure.

13.34 Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Council will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.

13.35 Where there is an infrastructure capacity constraint and no improvements are programmed by the water provider, we will use planning conditions and/or obligations requiring developers to provide secure mitigation and compensatory measures which must be completed prior to occupation of the development. Further information regarding flood risk, drainage and water supply can be found within Policies CC10 (Flood Risk) and CC11 (Sustainable Drainage). Further detail regarding obligations can be found within our Camden Planning Guidance on Developer Contributions and developers will be expected to have due regard to this.

Safety and security

13.36 Crime and the fear of crime can undermine people's quality of life, health and well-being. Planning can play an important role in reducing crime and helping to create safe, strong and open communities.

13.37 Our challenge is to make the borough a safer place for everyone, while making sure that Camden maintains the vibrancy that contributes so much to its character and success.

13.38 We know that everyone experiences places differently and that some groups with protected characteristics may feel more vulnerable using certain spaces, at certain times of the day. Development should aim to create a safe and secure environment and provide a sense of security for all users, to support good health and well-being and promote inclusion.

Policy A2
Safety and Security

A. To create a safer borough for all, the Council will require development to:

1. incorporate design, layout, and access measures to contribute to community safety and security, particularly in wards with relatively high levels of crime;
2. give consideration to designing out crime and anti-social behaviour at an early stage in the planning process. Major planning applications must be accompanied by a Crime Impact Assessment, which should demonstrate that any impact on crime and antisocial behaviour has been considered, addressed and, where appropriate, designed out;
3. be designed to include the following measures, where appropriate:
   a. overlooking of public spaces;
   b. active frontages that include frequent entrances (doorways) at ground floor;
   c. clearly defined boundaries between public and private spaces;
   d. effective lighting, which is sensitive to the context;
   e. direct and accessible routes that are easy to navigate, with good visibility and clear sight lines, from and through developments, spaces and/or buildings;
   f. clear signage;
   g. minimal clutter;
   h. materials that are robust, durable, and resistant to malicious damage; and
   i. security measures which are proportionate to their use and function and avoid hostile and reactive measures.
4. be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible, and acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently;
5. address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, central London and other centres, and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design;
6. address resilience to terrorism and natural hazards in a manner which is proportionate to the threat and the size and nature of the development and is appropriate to the context; and
7. mitigate potential suicide risks associated with the built environment, particularly in relation to tall buildings and structures, and transport infrastructure.

B. Applicants must evidence how they have addressed safety and security in their development proposal as part of the Design and Access Statement submitted with their planning application.

Design and security

13.39 Development in the borough provides the opportunity to implement measures to improve community safety, particularly where development takes place in areas with relatively high levels of crime and antisocial behaviour such as the King's Cross, Holborn and Covent Garden, Camden Town, and Bloomsbury wards.

13.40 Consideration of how crime, disorder and fear of crime can be addressed is an important element of good design. This can create safe and attractive places to live and work, reduce the opportunity for crime and allow for better maintenance and management of buildings and spaces. The Council will require all developments to incorporate appropriate design, layout and access measures to help reduce opportunities for crime, the fear of crime and to create a more safe and secure environment that meets the needs of Camden's diverse communities, acknowledging that different groups within the population use spaces, and perceive what is safe, differently.

13.41 The Council will require a Crime Impact Assessment to be submitted with all applications for major developments. This should be included as part of the Design and Access Statement for the development and demonstrate that any impact on crime and antisocial behaviour has been considered, addressed, and where possible, designed out. Minor schemes will also be expected to demonstrate in the Design and Access statement that safety measures have been incorporated.

13.42 In accordance with the NPPF, applicants should also consider the safety of children and other vulnerable users in proximity to open water, railways and other potential hazards when designing development schemes.

13.43 Applicants should ensure that security features are considered and incorporated into a scheme from the start of the design process. Care should be taken to ensure that the security features proposed are proportionate and complement other key design considerations, as part of a holistic approach to designing and maintaining inclusive and safe environments for all. Early engagement with Police Liaison Officers is recommended.

13.44 Further information on what should be included in a Crime Impact Assessment and Design and Access Statement, and on the design of security features, is set out within Camden Planning Guidance on Design. Developers will be expected to have due regard to this.

Food, drink and entertainment uses

13.45 Camden's food, drink and licensed entertainment premises and night-time economy contribute to the attractiveness and vibrancy of the borough but where there is a concentration of late-night activity there can also be problems such as noise and disturbance, littering, antisocial behaviour, crime, and violence. For many centres, the variety provided by a mix of uses is important for sustaining their draw and interest. The cumulative impact of food, drink and entertainment uses will therefore be assessed in line with the Council's town centre, amenity and noise/ vibration policies.

13.46 Management and maintenance plans will be secured by planning condition and/or Section 106 agreement with owners and operators of food, drink and licensed entertainment premises to ensure that the areas outside of premises are appropriately managed.

13.47 Where an otherwise acceptable development could have potentially negative impacts on community safety and security, either through its uses, hours of operation, or its design, the Council will require the developer to undertake or fund appropriate site-related works or measures to minimise these impacts, which will be secured through a Section 106 Agreement (which could take the form of a financial or non-financial contribution).

13.48 Further information on these issues is set out in our Camden Planning Guidance documents on Retail and Town centres, Employment and Design. Developers will be expected to have due regard to these.

Counter terrorism

13.49 Camden's position in the centre of a major international city, its high profile major transport interchanges and famous buildings and places make resilience to terrorism an important issue in some areas of the borough. If necessary, the Council will therefore work with the Ministry of Defence's Strategic Planning Team and local security advisors and consider the most up-to-date information provided regarding potential security risks.

Suicide risk

13.50 Suicide is a significant public health issue. The risk of suicide is not equal, however. Men are three times more likely to die by suicide than women; with the highest suicide rate in England being among men aged 45-49. People in the lowest socio-economic group and living in the most deprived geographical areas are also ten times more at risk of suicide than those in the highest socio-economic group living in the most affluent areas.

13.51 Around a third of all suicides take place outside the home, in a public location. Planning therefore has a role in preventing suicides, by ensuring that suicide prevention measures are incorporated into the design of all new buildings, public spaces, bridges and other infrastructure projects, at the earliest stage, to improve safety.

13.52 Applicants should consider the risk of suicide within a proposed development and consult the resource Preventing suicides in public places (https://www.gov.uk/government/publications/suicide-prevention-suicides-in-public-places) at an early stage in the design process. This is particularly important for tall buildings and structures, and transport infrastructure.

13.53 Design measures could include restricting access to the site and the means of suicide, increasing opportunity and capacity for human intervention, and increasing opportunities for the suicidal individual to seek help.

13.54 Applicants will be expected to evidence what suicide prevention measures they have included in their scheme as part of the Design and Access Statement for the development. Where a Health Impact Assessment (HIA) is required in accordance with Policy SC1 (Improving Health and Well-being), this should consider potential suicide risks associated with the built environment, particularly in relation to tall buildings and structures.

Air quality

13.55 Improving local air quality, mitigating the impact of development on air quality and reducing exposure to air pollution is vital to safeguard the health of Camden's communities and environment.

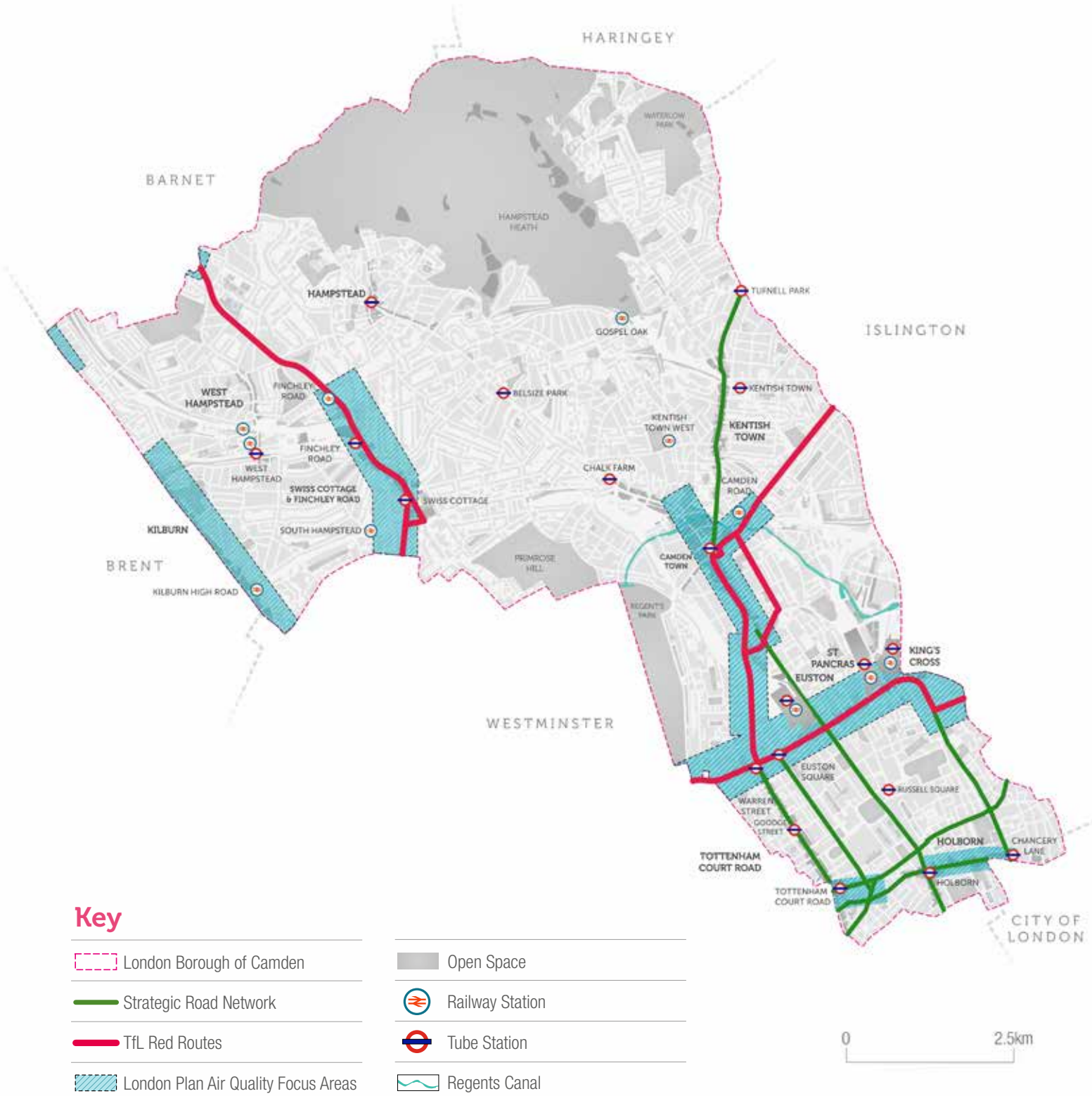
13.56 Long-term exposure to air pollution is estimated to cause as many as 36,000 premature deaths in the UK each year. While air pollution can affect everyone's health, at any stage in our lives, certain groups, including children and young people, older people, and people with lung or heart conditions, are more clinically vulnerable, and can suffer more severe health effects as a result.

13.57 The whole of Camden is defined as an Air Quality Management Area (AQMA) which was declared by the Council in 2002 to address nitrogen dioxide and particulate matter pollution. The GLA has identified a number of Air Quality Focus Areas in Camden, where the problems of high levels of air pollution and human exposure to air pollution are most acute. The Air Quality Focus Areas in Camden are shown on Figure 23 opposite.

13.58 Policy A3 below supports the objectives of Camden's Clean Air Strategy and seeks to ensure that development contributes to improving air quality in Camden.

Figure 23:

Air Quality Focus Areas



Key

- London Borough of Camden
- Strategic Road Network
- TfL Red Routes
- London Plan Air Quality Focus Areas
- Open Space
- Railway Station
- Tube Station
- Regents Canal

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Policy A3
Air Quality

A. The Council will expect development to contribute to improving air quality in Camden to protect public health and the natural environment. The Council will:

1. require all development to be at least air quality neutral, and submit an Air Quality Neutral Assessment, in accordance with the London Plan and associated guidance. An air quality positive approach is encouraged;
2. require the following types of development to submit an Air Quality Assessment, supported by detailed air quality modelling where requested by the Council:
   a. all major developments;
   b. any development that introduces sensitive uses (childcare, hospitals, playgrounds, or accommodation for elderly people) or sensitive occupiers (residential accommodation) into an area of poor air quality;
   c. development that involves substantial demolition, construction and/or earthworks;
   d. any development that could have a significant impact on air quality, either directly or indirectly;
   e. development with laboratory flues; and
   f. any development involving a biomass, or solid fuel, heating system, or gas or liquid fuel combined heat and power system (including connections to existing networks where the increased capacity is not already covered in an existing Air Quality Assessment).
3. require all development to use design solutions, including maximising the use of green infrastructure and nature based solutions, to reduce exposure to poor air quality (at present and in the future) and address local problems of air pollution to protect neighbours and future occupants of the development;
4. resist applications for sensitive uses in areas of particularly poor air quality;
5. resist developments that introduce sensitive occupiers in locations of poor air quality, unless they are designed to substantially mitigate the impact;
6. require all development involving the use of Non-Road Mobile Machinery (NRMM) to submit a statement to confirm and demonstrate that the GLA emission standards for NRMM will be met or exceeded throughout the development. This should be evidenced in the Air Quality Assessment;
7. require applicants to consider emergency back-up power for development sites (in the operational phase) early in the design process. Non-combustion solutions are expected;
8. resist proposals for wood or solid fuel heating or catering systems;
9. require applicants to give consideration to the actions identified in the Camden Clean Air Action Plan when designing and delivering development; and
10. require applications for development that includes commercial cooking to demonstrate how they will mitigate their impact on air quality.

Air quality neutral

13.59 Air quality neutral assessments seek to ensure that emissions from a completed development are no greater than the benchmark set out for the size and use class of the proposed development. GLA Air Quality Neutral guidance states how an Air Quality Neutral assessment should be made for applicable developments.

13.60 Most major development schemes will be required to submit an Air Quality Neutral Assessment, with the exception of developments that do not include any additional emissions sources (in these circumstances the Council should be notified that this is the case).

13.61 Other development types will need to submit a simplified Air Quality Neutral Assessment where they include additional emission sources and increase the number of homes between 1 and 9 or include an increase of floor area of less than 1,000 sqm (non-residential). Please see the latest GLA guidance for further information.

13.62 The London Plan supports an air quality positive approach for large scale developments, subject to Environmental Impact Assessment. These provide a greater opportunity to improve air quality and reduce exposure to existing poor air quality. This approach is encouraged for all development in Camden.

13.63 London Plan Guidance Air Quality Positive provides further information on measures and approaches towards delivering air quality positive and what is required in an Air Quality Positive statement.

Air quality assessments

13.64 An Air Quality Assessment (AQA) is an assessment of the impact of a development on the levels of certain pollutants in a local area. It determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality. The AQA should also consider wider cumulative impacts on air quality arising from several smaller developments in the vicinity of the proposed scheme.

13.65 For all developments requiring an AQA under Policy A3, a Screening Assessment or 'basic AQA' will be required as a minimum. This should include:

- an assessment of the current baseline situation in the vicinity of the proposed development;
- an assessment of the operational impact of development on occupants and the local area;
- an Air Quality Neutral assessment; and
- a construction impacts risk assessment.

13.66 A full or 'detailed' AQA, involving detailed modelling, will be required:

- where new residential accommodation and sensitive uses are introduced into an area of poor air quality;
- where new commercial floorspace or extensive commercial refurbishment are within an area of particularly poor air quality; or
- if the development has air quality implications.

13.67 The AQA should predict the future impact of operation, both with and without the proposed development, but including all consented development, by calculating statistics that can be compared with air quality objectives. (Modelling should not predict improvements to future years, future vehicle emissions or future background concentrations). Modelling must be undertaken in accordance with London Local Air Quality Management Technical Guidance.

13.68 Further information about how Air Quality Assessments should be undertaken is contained in our Camden Planning Guidance on Air Quality and developers will be expected to have due regard to this.

Reducing exposure to poor air quality through design

13.69 The location of a development has a direct influence on exposure to elevated air pollution levels. This is particularly relevant where developments include sensitive uses such as hospitals, schools and children's playgrounds. Suitable building design, layout and orientation can avoid increasing exposure whilst minimising energy demand and energy loss.

13.70 Indoor air quality needs early consideration in building design. Ventilation inlets should be located on higher floors, and away from sources of air pollution at ground level such as busy roads, and stationary sources of mechanical plant. Exhaust flues, chimneys, ventilation and kitchen outlets, along with other sources of air pollution from buildings must also be located away from (and designed such that emissions do not re-enter) ventilation inlets, openable windows or other spaces where occupants, building users, neighbours or members of the public might be exposed to these emissions (including neighbouring and nearby buildings). If located in an area of poor air quality, to reduce exposure, residential elements should be set back, or be at higher floors, if pollution is shown to disperse.

13.71 The location of outside space should also be given careful consideration at the design stage of a scheme. Any communal or private gardens, balconies and roof terraces should be located to minimise exposure to poor air quality and mitigation measures considered if this is not possible. Developers should also take care not to locate emission sources near recreational areas such as roof terraces, balconies or gardens.

13.72 Development sites which are likely to have high levels of air pollution and exposure should undertake air quality modelling at the earliest possible opportunity to inform the design of the scheme, necessary mitigation measures, and location/ placement of sensitive uses and occupiers, such as housing, schools, nurseries, care homes, hospitals and children's play areas. The design should also make provision to address local problems of air pollution.

Defining poor air quality

13.73 Camden has committed to achieving the revised World Health Organization (WHO) air quality guidelines in response to scientific evidence about the impact of air pollution on health (see The Camden Clean Air Strategy 2019 – 2034 which sets out our strategic objectives for realising the vision for a borough in which no person experiences poor health as a result of the air they breathe). The Camden Clean Air Action Plan 2023 – 2026 sets out the actions that we will take over the period to 2026 to improve indoor and outdoor air quality and protect public health in the borough. The Clean Air Action Plan commits to achieving WHO air quality guidelines by 2034, and sets interim targets for 2026 and 2030. These targets are the basis of what is considered to be 'poor air quality' and 'particularly poor air quality' in Camden. Please see Appendix 3 of the Local Plan for guidelines.

Demolition and construction

13.74 Construction and development often involve the use of machines such as excavators, generators, telehandlers, bulldozers, piling rigs, and cranes, and these are typically powered with diesel engines (emitting diesel particulate, sulphates and Nitrogen Oxides). On major construction sites, this machinery (which is often referred to as 'non-road mobile machinery' (NRMM)) can be employed for a significant period, resulting in the prolonged emission of air pollutants over multiple years.

13.75 Development sites should seek to utilise mains power as much as possible rather than needing to power machinery and site facilities with diesel or other polluting fuels. This should be explored at the earliest opportunity to maximise the benefits for air quality and the potential for carbon emissions reduction. NRMM emission standards are outlined on the GLA's website, and linked to London Plan policy SI1 (Improving air quality). Further guidance is set out in the Greater London Authority's Control of Dust and Emissions During Construction and Demolition supplementary planning guidance. Developers should also register Non-Road Mobile Machinery on the Greater London Authority website.

13.76 Crushing, cutting, grinding, drilling and breaking concrete and other materials produces airborne particulates, while excavation, earthworks, and open air storage of rubble or demolition waste can lead to windblown dust, adding to local air pollution levels. The Council will limit the disturbance from dust due to construction and demolition by expecting developers and their contractors to follow London Plan Guidance: The control of dust and emissions during construction and demolition. Details of how these measures will be implemented should be provided in a Construction Management Plan.

13.77 To monitor the impact of construction activities on air quality, the Council may require air quality monitoring, before and during the construction and demolition phases. The need for monitoring and the scale of monitoring depends upon the degree of dust risk according to the assessment methodology set out in London Plan guidance on dust and emissions. This requires medium risk schemes to provide a minimum of two real time construction dust (PM10) monitors, while high risk schemes require at least four. The choice of monitoring locations and positions (to be agreed by the Council) must clearly be justified on the basis of identified nearby uses, the prevailing atmospheric conditions, offsite emission sources, local topography and the relevant dust generating site activities.

13.78 Baseline monitoring would normally be required for at least 3 months, prior to commencement. The results of this will then be used to inform the interpretation of construction phase monitoring, and any actions required to avoid the measured level of dust (PM10) going above a pre-agreed trigger level will be agreed by the Council. The Council may seek a financial contribution from major development towards the management and implementation of compliance monitoring, assessment and investigation. This will be secured through a s106 agreement and would be commensurate to the scale and risk of the development project.

Emergency generators

13.79 Emergency back-up power for development sites in the operational phase should be considered early in the design process and non-combustion solutions are expected. Diesel or other liquid fuel (including biofuel) back-up power systems should be considered only as a last resort due to their disproportionately significant impact on local air quality, which, aggregated across the numerous buildings with fossil fuel backup generators in the borough, poses a risk to public health.

13.80 If combustion backup generators are justified, they must conform to the emission limit values for new plant in the Environment Agencies Medium Combustion Plant Directive (irrespective of generator capacity) and be designed to avoid over-sizing or excessive redundancy arrangements. Testing hours must be kept to a minimum and only at times without any current or forecast air pollution alerts. Flues should be positioned at high level, located away from (and designed such that emissions do not enter) ventilation inlets, openable windows or other spaces where occupants, building users, neighbours or members of public might be exposed to these emissions (including in neighbouring and nearby buildings).

Commercial cooking

13.81 Commercial cooking is a major source of PM2.5 emissions in Camden. Charcoal grills, wood-fired ovens, deep-fat frying, and gas stoves and ovens all produce significant amounts of air pollution. Considering that commercial kitchens are operational for many hours each day, a reduction in pollution emissions from commercial cooking would have significant benefits for air quality in the borough. Mitigation measures could include filtration and ventilation technologies or alternative cooking techniques. Ventilation should be designed to extract pollution (using filtration) and odours at a sufficiently high level to avoid impacts on neighbouring occupants, building users, kitchen workers. External extraction equipment and ducting should be sited sensitively, particularly on listed buildings and within conservation areas, and away from local receptors. Further details can be found in our Camden Planning Guidance documents on Design and Amenity and developers will be expected to have due regard to these.

Noise and vibration

13.82 Noise and vibration can have a significant effect on the environment and on the health and quality of life enjoyed by communities and individuals.

13.83 Exposure to noise can lead to effects including sleep disturbance, poor cardiovascular health, and poor mental health. Camden's high density and mixed-use nature means that exposure to noise and vibration is a particularly important issue in the borough.

13.84 This policy seeks to ensure that noise and vibration is appropriately considered at the design stage of developments, that sensitive uses are not detrimentally impacted by noise and vibration, and that existing uses (such as music venues, theatres and some employment uses) are not unduly restricted through the introduction of nearby sensitive uses.

Policy A4
Noise and Vibration

A. The Council will seek to ensure that noise and vibration is controlled and managed to avoid significant adverse impacts on health and quality of life. The Council will:

1. require the submission of an Acoustic Report where uses sensitive to noise and vibration are proposed close to an existing source of noise, or when a development is likely to generate noise. In assessing applications, the Council will have regard to the noise and vibration thresholds set out in Appendix 4, relevant national and regional policy and guidance, and British Standards;
2. ensure that where noise mitigation is required, this is incorporated into the proposed development at the design stage of the planning process;
3. require developments that are sensitive to noise and vibration to mitigate the impact of, and protect occupiers against, existing sources of noise and vibration in accordance with the Agent of Change principle;
4. resist development likely to generate unacceptable noise and vibration impacts;
5. only grant permission for noise and vibration generating development, including any plant and machinery, where the applicant can demonstrate to the Council's satisfaction that it can be operated without causing harm to amenity;
6. support retrofitting measures to existing noise and vibration generating sources and uses sensitive to noise and vibration, to minimise the impact of noise and vibration on occupiers; and
7. seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

Sources and character of noise in Camden

13.85 The main sources of noise and vibration in Camden are road traffic; railways; industrial uses; plant and mechanical equipment; food, drink and entertainment; some cultural uses; and building sites. The sources of noise that generate the most complaints in the borough are music; construction; general people noise (for example footsteps, gathering); parties; fixed machinery; and burglar alarms. In addition, fixed machinery, such as air conditioning units, can cumulatively have a harmful impact.

13.86 Noise and vibration sensitive uses include housing, schools, libraries, hospitals, offices, workshops, laboratories, hotels, open spaces and amenity spaces.

13.87 The borough is home to a large number and variety of food, drink and entertainment uses, often close to where people live. As a result, conflicts can arise. Such sources of noise and the character of noise can increase stress levels and cause significant disturbance. Other sources of noise, such as those associated with construction, are considered in Policy A1 (Protecting Amenity), which requires measures to attenuate noise impacts.

Assessing the impact of noise and vibration

13.88 Development proposals should be designed to minimise noise prior to proposing mitigation measures. The effect of noise and vibration can be minimised by separating uses sensitive to noise and vibration from sources that generate them and by taking other design and operational measures to reduce any impact.

13.89 Where uses sensitive to noise and vibration are proposed close to an existing source of noise or vibration, or when development which is likely to generate noise or vibration is proposed, the Council will require an acoustic report to accompany the application. In assessing applications, the Council will have regard to the noise and vibration thresholds set out in Appendix 4, other relevant national and regional policy and guidance, and British Standards.

13.90 An acoustic report should accompany a planning application where any of the following are proposed:

- plant, ventilation, air extraction or conditioning equipment and flues;
- uses likely to create significant noise such as food, drink, entertainment and leisure uses, industrial uses, day nurseries, places of worship, schools and colleges;
- a noise-sensitive use located in noisy environment;
- uses likely to generate a significant amount of traffic (defined as road traffic movements greater than 5% of Annual Average Daily Traffic);
- developments emitting low frequency noise (for example electricity substations); and
- development requiring an Environmental Impact Assessment (EIA).

13.91 The Council's Camden Planning Guidance on Amenity provides further information on how to minimise the impact of noise on developments, ways to mitigate noise emitted from developments, and further detail on how the Council will assess the impact of noise and vibration. Developers will be expected to have due regard to this.

13.92 Noise generating uses and fixed machinery will likely have a greater impact on amenity when the background noise level is lower or in areas where noise sensitive uses such as housing developments co-exist with other uses. The Council will take into consideration the general character of the noise (for example whether it is intermittent, has a distinct screech, bang, or hiss) and, where appropriate, the cumulative impacts of noise from one or more noise sources and will assess whether tighter noise restrictions, secured by planning condition, should be imposed.

13.93 The Council will only grant planning permission for developments sensitive to noise and vibration in locations that experience high levels of noise, and for development likely to generate noise impacts if appropriate mitigation measures can be provided. Such mitigation measures should be included in the information submitted with a planning application and will be secured through planning condition and/or legal agreement, where necessary.

13.94 In cases where noise sensitive development is proposed near an existing noise generating use (such as music venues and pubs) the Council will determine whether the introduction of the sensitive use will be harmful to the continued operation of the existing premises. In some cases, the Council may require the developer to be responsible for the costs of soundproofing, secured by a legal agreement, in accordance with the Agent of Change principle (see below).

13.95 The Council will also consider the impact of attenuation measures on the character and appearance of the building and locality, in accordance with the relevant design policies in the Plan (see Policy D1 (Achieving Design Excellence) and Camden Planning Guidance on Design).

Agent of change principle

13.96 The agent of change principle places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed new sensitive development.

13.97 The Council will apply the agent of change principle to all established noise generating activities, especially when new developments are proposed close by. Development should be designed to ensure that established noise generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

13.98 The noise and nuisance mitigation proposals for relevant developments should consider the particular features of music venue noise, including the low frequency spectral content and the enhanced sensitivity of people during night-time periods. Noise impacts may arise at noise levels that are relatively low, and, as such, it is important to set robust design criteria in consultation with the Council prior to an application being submitted. Applicants should ensure that the proposed mitigation measures are feasible and can provide the required level of performance when subjected to constraints faced during the implementation of the measure. All potential conflicts between noise sensitive uses and existing noise sources must be resolved prior to approval of planning permission.

13.99 Where a new residential building adjoins, or is close to, an existing commercial use that is likely to generate noise; or a change of use will result in a residential development being sited in a noisy environment, the Council is likely to use planning conditions requiring the substantially enhanced sound insulation of relevant walls, floors and ceilings compared to the minimum specifications of the Building Regulations.

13.100 Where a development sensitive to vibration is proposed in an area where vibration is anticipated to be present, an appropriate vibration survey should be carried out. Where vibration levels exceed those set out in Appendix 4 the proposal should demonstrate how vibration will be mitigated to acceptable levels.

Food, drink, entertainment and leisure noise

13.101 Within each of Camden's centres, the Council will seek to prevent concentrations of uses that would harm the area's attractiveness to shoppers or its residential amenity.

13.102 Assessments for noise and vibration from entertainment, cultural and leisure premises must include consideration of amplified and unamplified music, human voices, footfall, vehicle movements and general activity.

13.103 Generally, town centre uses and noise from cultural and leisure uses alter the noise environment through audio devices, amplified and unamplified music, footfall, congregations of people, plant and equipment, deliveries and transport, and can be particularly evident when the background noise level is quieter. The Council expects the noise impacts of food, drink, entertainment, cultural and leisure uses to be considered through an acoustic report. Further guidance on this is provided in Camden Planning Guidance documents on Amenity and on Town Centres and Retail. Developers will be expected to have due regard to this.

13.104 Where food, drink, entertainment, cultural and leisure uses are considered acceptable, the Council may impose planning conditions to control matters such as (but not limited to) hours of operations, amplified music and times where outdoor areas can be used.

13.105 The Council will also consider the use of management plans secured through a legal agreement, which may include elements seeking to manage noise off-site.

Plant and other noise generating equipment

13.106 Planning conditions will be imposed to require that plant and equipment which may be a source of noise (including heat pumps) are kept working efficiently and within the required noise limits and time restrictions. Conditions may also be imposed to ensure that attenuation measures are kept in place and are effective throughout the life of the development, such as long-term maintenance agreements.

Retrofitting measures

13.107 There will be circumstances where retrofitting measures are required to existing noise and/or vibration sources in order to mitigate their impact on the surrounding area, or to sensitive uses (including homes) to minimise exposure to noise and vibration. The Council will support acoustic and vibration retrofitting measures where the applicant can demonstrate to the Council's satisfaction, that they will be effective in mitigating/reducing the impacts of noise or vibration.

Delivery management

13.108 Deliveries, collections and the loading and unloading of goods and refuse can be a source of disruption and cause noise nuisance too close to residential properties, particularly when undertaken at night. Therefore, to manage potential noise issues from deliveries, conditions will usually be applied to require deliveries, collections and the loading and unloading of goods and refuse to take place between the hours of 08:00 to 20:00.

13.109 Developments requiring deliveries outside of these times will be required to provide an acoustic report to demonstrate there will be no adverse impact on the acoustic environment with particular reference to residential occupiers as a result of these activities. This could be evidenced within the Delivery and Servicing Management Plan for the site. Regard should also be had to the Noise Abatement Society's 'silent approach' quiet time delivery scheme and TfL's 'Retiming Deliveries' to mitigate the negative effects of possible out of hours deliveries.

Demolition and construction management

13.110 Measures to mitigate the impacts of noise and vibration associated with demolition and construction will be secured through Construction Management Plans secured by legal agreement (see Policy A1 (Protecting Amenity).

14

Safe, Healthy and Sustainable Transport

14 Chapter

Safe, healthy and sustainable transport

14.1 Camden's transport network and streets play an essential role in connecting people to opportunities and essential goods and services both within and outside of the borough, including jobs, education, health care, shops, recreation, and leisure.

14.2 Transport accessibility is also a major catalyst for unlocking sites allocated for development in the Local Plan.

14.3 The Camden Transport Strategy sets out the Council's ambitions for transport in the borough with the aim of transforming mobility, enabling and encouraging people to travel and goods to be transported, healthily and sustainably. The policies in this chapter support the delivery of the Council's Transport Strategy by prioritising sustainable modes of transport such as walking, wheeling, cycling and public transport. They seek to minimise the use of motor vehicles to transport both people and freight, by only supporting this where there is essential need, and encouraging use of low polluting motor vehicles.

Policy T1

Safe, Healthy and Sustainable Transport

A. The Council will prioritise the delivery of safe, active, healthy, affordable, and sustainable transport in line with the Camden Transport Strategy, Climate Action Plan, and Clean Air Action Plan to maximise health and well-being, reduce traffic congestion, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities. The Council will:

1. prioritise walking, wheeling, and cycling;
2. expect development that involves changes to existing, or the provision of new streets, to implement the Mayor's Healthy Streets approach, to ensure that streets are designed to be attractive, safe, inclusive and accessible for all, giving particular attention to the needs of older people, users with disabilities, neurodiverse people, women, girls and gender diverse people. All major development proposals will be required to include a Healthy Streets Assessment as part of a Transport Assessment;
3. seek contributions from development towards the delivery of appropriate highways greening measures including tree planting, rain gardens and Sustainable Drainage Systems;
4. reduce vehicle use through the delivery of car free development; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials;
5. require development to reduce and mitigate the impact of transport-based emissions and noise;
6. not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure projects;
7. protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance;
8. seek contributions towards the delivery of shared transport infrastructure and services from development that increases the demand to travel in Camden, in accordance with Policy T4 (Shared Transport Infrastructure and Services);
9. seek contributions towards the delivery of an efficient, well-maintained highway network and kerb-side space that prioritises the sustainable movement of goods, services, materials, and people from development creating a demand for travel;
10. ensure that economic growth and regeneration is both supported by, and supports, a sustainable transport network; and
11. seek contributions towards enhancing the existing transport network from development that increases the demand to travel, where appropriate, to improve and increase opportunities for active and sustainable travel.

14.4 Policy T1 supports the delivery of the Council's Transport Strategy and associated Action Plans, the Climate Action Plan, Biodiversity Action Plan and Clean Air Strategy and seeks to deliver London-wide transport initiatives including the Mayor's Healthy Streets approach and Vision Zero Strategy. The policy is also intended to help meet the target set in the Council's Local Implementation Plan for 93% of all journeys in Camden to be made by sustainable modes by 2041.

14.5 The policy aims to:

- improve health and reduce health inequalities;
- promote highways greening, including through the introduction of more street trees, pocket parks, green space, rain gardens and Sustainable Drainage Systems;
- reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise;
- increase walking, wheeling, cycling and public transport use;
- improve street safety, comfort, convenience, and amenity; and
- support these outcomes through sensitively designed servicing facilities.

Healthy streets

14.6 The Mayor's Healthy Streets Approach is about making streets healthy places for everyone, by putting human needs and experiences at the centre of public realm and transport design, to ensure that streets:

- are welcoming places for everyone;
- are easy to cross for everyone;
- include shade and shelter;
- provide places to stop and rest;
- are not too noisy;
- incentivise active travel;
- feel safe;
- are visually appealing and provide things to see and do;
- help people feel relaxed instead of anxious; and
- are not adversely effected by poor air quality.

14.7 However, we know that not everyone's experiences of streets are equal, which is why when designing new streets, or making improvements to existing ones, developers will be expected to give particular attention to the needs of older people, users with disabilities, neurodiverse people, women, girls and gender diverse people, and seek to ensure that these needs are met.

14.8 Development coming forward in Camden will be expected to contribute to the delivery of Healthy Streets, in line with the priorities set out in the Council's Transport Strategy, Clean Air Action Plan and Climate Action Plan. As part of this, applications for major development will need to include a Healthy Streets Assessment as part of the Transport Assessment. Further guidance on this is set out in Camden Planning Guidance on Transport and developers will be expected to have due regard to this guidance when progressing development schemes in Camden.

Transport infrastructure

14.9 Projects to provide new and improved transport infrastructure will play a central role in supporting development and promoting sustainable transport within the borough. As major development will largely be concentrated in locations that are, or will be, subject to significant transport improvements, land and facilities will therefore need to be safeguarded to ensure delivery of these projects. Furthermore, given the constraints on transport capacity in a densely developed borough like Camden, almost every part of the existing transport infrastructure is an asset. The Council will therefore seek to protect all existing and proposed transport facilities and links and safeguard the potential for improvements to the transport network.

Transport assessments

14.10 When determining applications for new development, the Council will consider the impacts of movements to, from and within a site, including links to existing transport networks, through transport assessments, travel plans, delivery and servicing management plans, and construction

management plans, to manage and mitigate the impact of developments on Camden's infrastructure, environment and communities, and ensure that benefits are secured which meet the needs of Camden's communities.

14.11 Where the transport implications of proposals are considered to be significant, we will require a full Transport Assessment to examine the impact on transport movements arising from the development. In some circumstances where the transport implications are less severe, but still significant, we would require a Transport Statement rather than a full Transport Assessment. Camden Planning Guidance on Transport provides guidance on the scale of development that is likely to generate a significant travel demand and therefore requires either a Transport Assessment or a Transport Statement. It also sets out how Transport Assessments should be prepared and what they should cover.

14.12 For further information on the content and application of these documents please refer to Policy A1 (Protecting Amenity), Policy T6 (Sustainable Movement of Goods, Services and Materials) and our Camden Planning Guidance documents on Transport, Amenity, and Developer Contributions.

Financial contributions to transport improvement schemes

14.13 If a Transport Assessment shows that a development will have an impact on existing infrastructure in a local area that cannot be mitigated through the use of planning conditions, then a financial contribution will be sought and this will be secured by a Section 106 legal agreement.

14.14 Where an impact on existing infrastructure in a local area is identified, developments will be expected to contribute towards the delivery of appropriate mitigation measures. This may include:

- measures identified in the Council's Transport Strategy and associated 3-year Delivery Plans (index linked);
- interventions identified in Transport Assessments in line with Camden Planning Guidance on Transport and/or Transport for London Healthy Streets guidance;
- infrastructure projects identified in the Area Policies for the South, Central, West and Northern areas of the borough (Policies S1, C1, W1 and N1), and the site allocation policies set out in Chapters 3 to 6 of the Local Plan;
- strategic Transport Delivery schemes identified in the Council's Infrastructure Delivery Plan; and
- measures that assist in the delivery of the wider objectives set out in the transport policies in the Local Plan.

14.15 Where a financial contribution is required, the scale of the contribution will be proportionate to the level of intervention required to mitigate the impact of the development.

14.16 Securing financial contributions from developments to mitigate the impact on existing infrastructure in a local area will assist the Council to:

- continue to invest in active travel infrastructure, which supports wider environmental, social (including public health), climate change and economic objectives by encouraging sustainable travel options, to create a greener, more sustainable Camden;
- ensure that adequate infrastructure is in place to accommodate and support growth in Camden, to deal with future demand; and
- pool monies collected through Section 106 to fund significant transport infrastructure projects, with wide reaching benefits.

14.17 Further guidance on the Council's approach to planning obligations is set out in Camden Planning Guidance on Transport and developers will be expected to have due regard to this guidance when progressing development schemes in Camden.

Prioritising walking, wheeling, and cycling

14.18 To manage a diverse and often conflicting demand for limited carriageway, footway and kerbside space, the Council currently adopts a road user hierarchy, which prioritises the most efficient, sustainable, and healthy modes of travel - walking, wheeling, cycling and public transport.

14.19 This approach is set out in the Council's Transport Strategy and is reflected in the approach taken in this Local Plan, which seeks to improve the conditions for pedestrians, cyclists (including disabled pedestrians and cyclists) and public transport users in the borough.

14.20 Enabling a greater proportion of journeys to be made by walking, wheeling, and cycling is an essential element of the Council's efforts to improve air quality, reduce transport's contribution to climate change, tackle congestion on the transport network, create more inclusive streets, and improve the health and well-being of our residents and visitors. Development will therefore be required to prioritise the needs of pedestrians, cyclists and disabled pedestrians and cyclists in line with Policy T2 below.

Policy T2

Prioritising Walking, Wheeling, and Cycling

A. The Council will promote active travel by prioritising walking, wheeling, and cycling in the borough, to improve health and well-being, reduce traffic congestion, reduce harmful emissions, improve air quality, help to tackle climate change, and deliver sustainable communities.

Walking and Wheeling

B. To promote walking and wheeling in the borough the Council will:

1. promote the delivery of high-quality public realm improvement works, including pedestrianisation and the provision of safe road crossings where needed, wider pavements where possible, seating, signage, and landscaping, including tree planting, and other street greening measures and we will seek contributions from development to deliver this where appropriate;
2. require development to be easy and safe to move through (permeable), adequately lit and well connected to adjoining areas;
3. require development to be designed to be inclusive and fully accessible to meet the needs of all pedestrians in accordance with Policy SC2 (Access for All);
4. expect the provision of high-quality footpaths and pavements that are wide enough for the number of people expected to use them;
5. seek contributions towards new bridges and bridge improvement works where appropriate (for example over railways and the Regents Canal); and
6. seek contributions from schemes that increase travel demand towards other relevant infrastructure and "behaviour change" measures as set out in the Council's Walking and Accessibility Action Plan.

Policy T2
Prioritising Walking, Wheeling, and Cycling

Cycling

C. To promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will:

1. expect schemes that increase travel demand to provide for, and make contributions towards high quality, connected, accessible, inclusive, convenient, and safe cycle routes, in line with or exceeding London Cycle Design Standards/national LTN 1/20 standards, including the implementation of improvements to strategic primary and secondary cycle routes in the borough set out in the Camden Transport Strategy Delivery Plan;
2. require development to provide for high quality, accessible, inclusive, convenient, and safe cycle parking facilities, 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 expected in areas well served by cycle route infrastructure, taking into account the size and location of the development;
3. require major development schemes to make provision for high quality, accessible, and inclusive facilities that promote cycle usage, including changing rooms, showers, dryers and lockers;
4. seek on-site provision of, or contributions towards, the off-site provision of, improved cycle hire (and e-scooter hire) provision, including both “docked” and “dockless” systems in accordance with Policy T4 (Shared Transport Infrastructure and Services);
5. require development to be easy and safe to cycle through (permeable) and well connected to the wider cycle network;
6. seek contributions towards bridges suitable for cycle use, where appropriate (for example over railways and the Regents Canal); and
7. seek contributions towards other relevant infrastructure and “behaviour change” measures as set out in the Council’s Cycling Action Plan.

Walking and wheeling

14.21 The Council's Transport Strategy and associated Walking and Accessibility Action Plan provide a framework for increasing walking and wheeling in Camden for all types of journeys. To deliver the Council's aspirations, a range of infrastructure improvements will be needed to create safer, more accessible and inclusive streets for all. Several infrastructure projects are set out in the Walking and Accessibility Action Plan and these will be updated on a 3-yearly cycle. The Council will seek to secure contributions towards the delivery of these projects using planning obligations, in line with Policy T2 (Prioritising Walking, Wheeling and Cycling) above.

14.22 Further to this, Policy D1 (Achieving Design Excellence) and our Camden Planning Guidance documents on Design and Transport set out the Council's approach to providing attractive streets and spaces and developers will be expected to have due regard to these. Public realm improvements will be delivered by the Council using our own funding, developer contributions, funding from Transport for London and other sources where available. The Council will continue to work with Transport for London and neighbouring London boroughs to deliver improved accessibility, connectivity and way finding within Camden and into neighbouring boroughs.

Cycling

14.23 Cycling is a popular, healthy, and sustainable means of travel which the Council is are strongly committed to encouraging. The Camden Transport Strategy and associated Cycling Action Plan provide a framework for increasing cycling and promoting safer cycling in the borough. To deliver the Council's aspirations, a combination of infrastructure improvements will be required to create safer, more accessible and inclusive cycle routes for all. A number of infrastructure projects are set out in the Cycling Action Plan and these will be updated on a 3-year cycle. The Council will seek to secure contributions towards the delivery of these projects using planning obligations, in line with Policy T2 (Prioritising Walking, Wheeling and Cycling) above.

14.24 Furthermore, the Council will seek to ensure that developments contribute to and, where appropriate provide links to strategic cycle routes. We will also expect cycle parking to be convenient, safe, and secure, so that users of a development are more likely to use bicycles to travel to and from a site. The Council will expect new cycle infrastructure to be inclusive and accessible to meet the needs of all cyclists, including disabled cyclists. Details regarding cycle parking standards and design requirements can be found within our Camden Planning Guidance on Transport and developers will be expected to have due regard to this.

Public transport

14.25 Camden is extremely well served by public transport, particularly in the south of the borough, which has some of the highest Public Transport Accessibility Level (PTAL) ratings in the country.

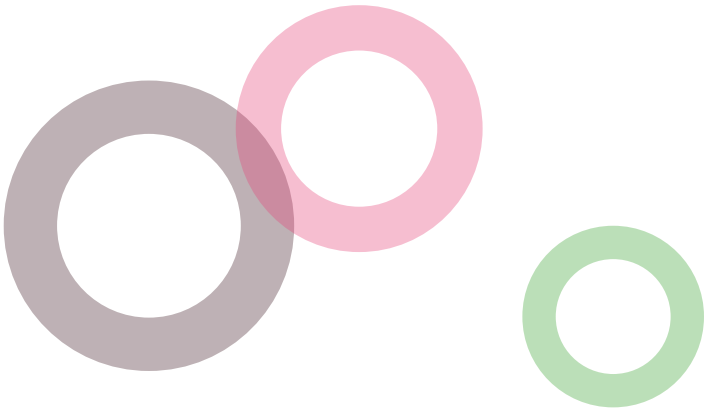
14.26 Areas with relatively lower levels of public transport provision continue to exist however, particularly in the north of the borough.

14.27 During peak commuting times, the borough's public transport network operates at or near capacity despite recent upgrades to frequencies and stations, and only a small number of the borough's stations provide full step-free access.

14.28 The Area Policies for the South, Central, West and Northern areas of the borough, detailed in Policies S1, C1, W1 and N1, set out the transport infrastructure priorities for those areas and further priorities are set out in the Council's Infrastructure Delivery Plan. Investment in public transport is required to support the delivery of the site allocations identified in this Plan to sustain Camden's economy, to deliver the Council's ambitions around reducing car ownership and use, and to deliver equality in access for Camden's residents. This is expected to be delivered in line with Policy T3 opposite.

Policy T3
Public Transport

A.	To safeguard and promote the provision of public transport in the borough the Council will seek to ensure that development contributes towards improvements to bus network infrastructure, and tube and train station improvements to assist with the delivery of the transport projects identified in the Council's Infrastructure Delivery Plan.
B.	Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments and the provision of improved public transport infrastructure including bus shelters and passenger information, and step free access and capacity improvements at stations in the borough.
C.	Where appropriate, development will also be required to provide for interchanges between different modes of transport, including facilities to make interchange easy and convenient for all users and maintain passenger comfort.



14.29 In partnership with Transport for London, which manages the majority of the public transport network across London, the Council will ensure that Camden's growth is supported by improvements to public transport secured through planning obligations. Details regarding public transport contributions can be found within Camden Planning Guidance on Transport and developers will be expected to have due regard to this.

14.30 Many journeys involve changing between one form of travel and another, and developments will sometimes need to cater for this. Passenger transport interchange facilities should be designed and delivered in accordance with Transport for London's Interchange Best Practice Guidelines. They should provide for the coordination of arrival and departure timetabling on different services as far as possible. Interchanges should be designed to be accessible, safe and welcoming. Where interchanges cater for longer distance journeys, these should include toilets (including Changing Places toilets), baby changing facilities and facilities to provide refreshment for travellers.

14.31 Public transport should be accessible to all. However, there are several rail and tube stations within Camden that do not offer step-free access. Step-free stations offer accessible routes from entrance to platform via lifts and/ or ramps without the need for stairs and/or escalators. Step-free projects are largely managed by Transport for London and/or rail network companies. The Council will however promote step-free access and other station upgrades where possible and seek contributions from appropriate development schemes to deliver this, in addition to working with organisations seeking to implement step-free access and other station improvements at Camden stations.

Shared transport infrastructure and services

14.32 The Council is working to promote the use of shared transport infrastructure and services in Camden to reduce private motor vehicle use and provide alternative modes of transport to the public transport network.

14.33 The concept of shared transport is where travellers share a vehicle either simultaneously as a group (for example a car club) or over time as a personal rental (cycle/scooter hire). It is a demand-driven, flexible way of accessing transportation services on an as-needed basis, and acts as a hybrid between private vehicle use, and use of public transport.

14.34 The Council is committed to providing a network of shared transport infrastructure and services across Camden. This includes the expansion and improvement of the cycle hire docking station network, the e-bike and e-scooter hire bay network, the electric vehicle charging point network, and the car club bay network. The Council will also develop a network of micro mobility hubs and cargo bikes for hire.

Policy T4

Shared Transport Infrastructure and Services

A. To support the delivery of shared transport infrastructure and services the Council will seek contributions towards the measures set out below from developments that increase travel demand. We will:

1. work with Transport for London to expand and improve the cycle hire docking station network in the borough;
2. continue to expand the network of e-bike and e-scooter hire bays in the borough;
3. develop a network of cargo bikes for hire in the borough;
4. develop a network of micro mobility hubs in the borough;
5. deliver a network of on-street electric vehicle charging points; and
6. work with car club operators to expand and improve the network of car club bays in the borough, including the provision of electric car club vehicles where possible.

14.35 The Council has developed a methodology for assessing Shared Transport Accessibility Levels in Camden (STALC). This is similar to the methodology for assessing Public Transport Accessibility Levels (PTAL). Shared transport options will be prioritised where public transport accessibility levels and STALC levels are low.

14.36 There are more than 12,000 Santander bikes at around 800 docking stations across London and TfL has begun introducing e-bikes into their fleet. The Council is committed to working with TfL to expand the existing network to parts of the borough without any provision. Improvements to the network will help enable more journeys by residents and visitors to the borough, contributing to the Council's Cycling Action Plan and cycle mode share targets.

14.37 There is a network of over 200 e-bike and e-scooter hire bays in the borough. These modes of transport are popular with our residents and visitors, including people who work or study in the borough. The Council is committed to expanding the network bays over the Plan period to make it easier and more convenient for citizens to hire e-bikes and e-scooters. Expansion of the network will provide high quality alternative modes of transport to private motor vehicle use.

14.38 The Council is committed to delivering a network of micro mobility hubs in the borough, including where feasible cycle/scooter hire docking stations, e-bike and e-scooter hire bays, cargo bikes for hire, and car club bays. The network of micro mobility hubs will provide high quality alternative modes of transport to private motor vehicle use.

14.39 The borough currently has the largest car club network in London with over 200 car club parking bays. This provides a real alternative to private car ownership for people who need to use a car occasionally. Car clubs help people give up private car ownership by offering a vehicle when there is an essential need. It is estimated that each car club vehicle takes approximately 10 vehicles off the road, helping to reduce congestion and pollution as well as parking pressure. The Council is committed to working with car club operators to expand and improve the network of car club bays in the borough, including the provision of electric car club vehicles where possible.

14.40 Our Electric Vehicle Charge Point Action Plan sets out the Council's plans to develop a comprehensive network of electric vehicle charge points that both responds to existing demand for electric vehicle (EV) infrastructure and provides for and accelerates the uptake of cleaner vehicles in the future. Contributions will be sought towards the expansion of the electric vehicle charging points network in the borough.

Parking and car-free development

14.41 Camden is highly accessible and well connected, with residents in most areas of the borough able to access essential day to day services such as shops, healthcare, education facilities and employment opportunities, within 15 minutes of their homes – either by walking, wheeling, cycling, or by public transport, to help them live a fulfilling and healthy life in their local area.

14.42 Limiting the opportunities for parking within the borough can reduce car ownership and use and therefore lead to reductions in air pollution and congestion and improve the attractiveness of an area for walking, wheeling and cycling.

14.43 Car-free development will also mean that the borough's limited land can be used more efficiently, which will help to free up space to allow additional housing, employment uses, community facilities, play areas, amenity spaces and cycle parking.

14.44 The Council does, however, also recognise that some people, businesses and organisations rely on private vehicle use as their only transport option. Parking provision for disabled people and essential uses will therefore be considered where necessary.

Policy T5
Parking and Car-free Development

A. The Council will limit the availability of parking and require all new developments in the borough to be car-free to reduce car ownership and vehicle use and encourage the use of alternative, sustainable modes of travel. The Council will:

1. not issue on-street or on-site parking permits in connection with new developments and will use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
2. resist the provision of on-site car parking. On-site parking in new developments will be limited to:
    a. spaces designated for disabled people where necessary; and/or
    b. essential operational or servicing needs;
3. require developments that provide or retain on-site parking to install electric vehicle (EV) charging points in accordance with London Plan requirements. Electric vehicle charging points should be integrated into the design of the streetscape and should not obstruct pedestrian movement;
4. expect developments to make provision for the storage and charging of mobility scooters where appropriate;
5. support the redevelopment of existing areas of car parking (including garages) for alternative uses;
6. reduce on-site parking, as far as possible, as part of re-development schemes;
7. require parking management plans to be submitted for development schemes that include the provision or retention of on-site parking;
8. resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking; and
9. seek contributions towards the review of Controlled Parking Zones (CPZs) where a development is shown to contribute to an increase in on-street parking in a local area or have an unacceptable impact on highway safety.

Car-free development

14.45 Car-free development means that no car parking spaces are provided within the site other than those reserved for disabled people and businesses and services reliant upon parking, where this is integral to their nature, operational and/or servicing requirements (for example emergency services, visiting health and care providers, storage and distribution uses). In addition, current and future occupiers are not issued with on-street parking permits. All new residential developments in the borough, including schemes where homes are created through a change of use, should be car-free. Parking will only be considered for new non-residential developments where it can be demonstrated that the parking provided is essential to the use or operation of the development. Staff parking is not considered essential and will not be permitted. Parking for disabled people for both residential and non-residential developments should be provided where it can be demonstrated to be necessary.

14.46 Where on-site parking spaces are provided or retained, electric vehicle (EV) charging points should be provided in accordance with the London Plan requirements to support the development of a comprehensive network of charge points that both responds to existing demand for EV infrastructure and provides for and accelerates the uptake of cleaner vehicles in the future.

Parking in redevelopment schemes

14.47 Land is an important resource, particularly within a densely developed and populated area such as Camden. To help make the most efficient use of the borough's limited land, the Council will therefore promote the development of existing areas of parking (including garages) for alternative uses.

14.48 The Council will seek to reduce existing on-site parking provision as part of redevelopment schemes. The Council will only consider the retention or reprovision of existing parking provision where it can be demonstrated to its satisfaction that the existing occupiers are to return to the address when the development is completed. This is common where an existing dwelling or block is being extended or subdivided. If a development is to have new occupiers, it should be car-free. Any new development on an existing car park should be car free in accordance with Policy T5.

Boundary treatments and gardens

14.49 Parking can cause damage to the environment. Trees, hedgerows, boundary walls and fences are often the traditional form of enclosure on Camden's streets, particularly in conservation areas, contributing greatly to their character, as recognised in Camden's Conservation Area Appraisals and Management Strategies. This form can be broken if garden features, including trees and hedgerows, are replaced by areas of paving or hard standing, the loss of which is also harmful to wildlife and biodiversity.

14.50 Development of boundary treatments and gardens to provide on-site private parking often requires the loss of much-needed public on-street parking bays to create vehicle crossovers. Areas of paving can also increase the volume and speed of water run-off. This adds to the pressure upon the drainage system and increases the risk of flooding from surface water. Developments seeking to replace garden areas and/or boundary treatments for the purpose of providing on-site parking will therefore be resisted.

Controlled parking zones

14.51 Camden has high levels of parking stress and the whole borough is covered by a Controlled Parking Zone (CPZ), with the hours of control varying. CPZs help to manage the demand for parking locally, ensuring that local residents can park. They also limit parking, and therefore opportunities to drive, particularly for those coming into Camden from outside the borough during peak hours and contributing to congestion. CPZs also discourage short trips within the borough, for example between CPZs during the hours of control.

14.52 Where a Transport Assessment shows that a development is likely to contribute to an increase in on-street parking in a local area, or have an unacceptable impact on highway safety, developers will be expected to contribute to a review of the CPZ effected.

Sustainable movement of goods, services, and materials

14.53 The movement of goods, services, and materials (freight) is fundamental for Camden's economy and supporting day to day living.

14.54 However, as this movement largely relies on Camden's road network, it can have a significant impact on the environment and the health and well-being of residents, in terms of noise disturbance, road safety, and its contribution to road congestion, air pollution, and climate change.

14.55 A key aim of the Council is therefore to minimise the movement of goods, services, and materials by road by reducing the number of freight trips generated in Camden; shifting freight trips to cleaner, more sustainable and more efficient transport modes, for example cargo bikes; and encouraging freight trips to be undertaken outside of peak hours in particular locations. Development will be therefore expected to support safe, clean and efficient deliveries and freight and servicing operations in accordance with Policy T6 below and also take into account the Council's Freight and Servicing Action Plan (FSAP).

Policy T6

Sustainable Movement of Goods, Services, and Materials

A. To promote the sustainable movement of goods, services and materials and minimise their movement by road, the Council will:

1. encourage the safe movement of goods, services and materials by bicycle/ cargo bikes, light electric vehicles, canal, and rail, where possible;
2. expect major developments to make provision for cargo bike parking on-site where appropriate;
3. seek contributions towards the delivery of new and improved cycle routes and cargo bike parking from new logistics and freight consolidation developments that result in additional cargo bike movements;
4. protect existing facilities for waterborne and rail freight traffic;
5. require developments to be designed to enable and encourage servicing using sustainable means, for example on foot, by cargo bike, or using zero emission vehicles;
6. seek to minimise the impact of freight and servicing trips through measures such as the provision of on-site servicing facilities, the timing of deliveries outside peak hours and the adoption of area wide solutions;
7. promote the provision and use of freight consolidation facilities to ensure that last mile deliveries are undertaken by sustainable means;
8. encourage the use of underused spaces in the borough for micro mobility hubs, and urban logistics hubs;
9. seek to ensure that parcel drop-off and micro mobility hubs are incorporated into new developments, where appropriate; and
10. require developments to support safe, clean and efficient deliveries, freight and servicing operations.

B. Where developments are likely to generate significant movement of goods, services, or materials by road (both during construction and operation), applicants will be expected to:

1. minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads;
2. accommodate goods vehicles on site, where feasible; and
3. provide Construction Management Plans, Delivery and Servicing Management Plans, and Transport Assessments.

Developments in predominantly residential areas will be expected to avoid large goods vehicle deliveries for the ongoing use or operation of the site.

C. Where the impact from a development cannot be mitigated to the Council's satisfaction, then the Council will expect the development to contribute towards off-site freight/servicing provision (for example, last-mile delivery hubs or cycle freight systems) and other measures, as appropriate.

Cycle freight

14.56 Over recent years, there has been a growth in the use of cycle freight in London, as a means of providing a sustainable freight and servicing solution. Cycle freight is an affordable, safe, clean, and efficient alternative to vans and other light goods vehicles and is particularly well suited to last mile deliveries.

14.57 The Council will promote the use of cycle freight, by expecting developers to make provision for cycle freight as part of Delivery and Servicing Management Plans. This provides the potential to manage deliveries in a way that is zero carbon, has little or no noise or air pollution implications and has a minimal impact on congestion.

14.58 The Council recognises, however, that to support the continued growth in cycle freight, investment is required in infrastructure, including wider cycle lanes and cycle parking, to enable the greater use of cargo bikes. The Council will therefore seek to ensure that major developments contribute to and, where appropriate, provide appropriate cycling infrastructure to support cargo bike usage. This should however be in addition to the wide spaced Sheffield stands for non-standard cycles that are expected to be provided in all new developments.

14.59 Where applications are received for cargo bike storage facilities at existing residential properties or commercial developments these will be determined in accordance with the Council's design policies and other relevant policies in this Plan.

Rail and water freight

14.60 The Council recognises the problems that are caused by long distance movement of goods by road and the potential advantages of using rail and water as alternatives. The north London Line, the Gospel Oak to Barking Line and the West Coast Mainline are already used for significant volumes of rail freight. Rail freight is promoted as a real alternative to road as it contributes to fewer emissions.

14.61 The Regent's Canal is thought to be an economically viable route for some freight movements, notably the removal of demolition waste from canal-side sites. The Council will expect new developments along or close to the Canal to consider its use for the movement of goods and materials and to contribute to the improvement of the Canal towpath, where appropriate. The Canal is a Metropolitan Site of Importance for Nature Conservation (SINC) as it supports a range of aquatic flora, fish, invertebrates, and waterfowl, and a variety of waterside plants grow on its brickwork and banks. Developments which generate freight movements via the Canal may be required to provide evidence that operations will not cause excessive disturbance to habitats in line with Policy NE2 (Biodiversity).

14.62 The Council will also seek to protect track-side freight processing sites such as the existing aggregate handling facility at King's Cross, in addition to canal-side freight facilities.

Servicing and deliveries

14.63 Where possible, servicing and deliveries should take place within the curtilage of the development and developments should incorporate space within the site for goods vehicles. The space required for service vehicles is set out within our Camden Planning Guidance on Transport.

14.64 To minimise the impact of freight and servicing trips on local neighbourhoods and Camden's road network, deliveries and servicing should be timed to take place outside of peak travel hours, and area wide solutions (for example the use of freight consolidation centres) should be sought. Applicants are recommended to discuss servicing and deliveries as part of the pre-application process, liaising with the Council's Highways team as appropriate. Development should show how servicing and deliveries have been considered in the design of the development in its Design and Access Statement and, where required, a Servicing and Deliveries Management Plan.

14.65 Relevant development should also demonstrate how deliveries and servicing to other sites will occur using sustainable or zero emission means. This could include details of vehicles, electric vehicle charging points and cargo bikes within a Servicing and Deliveries Management Plan.

Freight consolidation, urban logistics, and micro mobility hubs

14.66 The Council will promote the use of freight consolidation centres, urban logistics, and micro mobility hubs within Delivery and Servicing Management Plans to ensure that last mile deliveries are undertaken by sustainable means. These facilities usually cover a defined geographic area and enable multiple suppliers to deliver to a single hub. At the hub goods are grouped together so that fewer delivery journeys are required. This approach helps reduce congestion, air pollution and noise on Camden's roads. Further information regarding Delivery and Servicing Management Plans is available within our Camden Planning Guidance on Transport.

14.67 The Council will seek to secure contributions towards the provision of freight consolidation hubs and micro mobility hubs where such provision would result in reduced vehicle trips and impacts on the environment. Micro mobility hubs in Camden include parking bays for rental e-bikes and e-scooters. They also include dedicated parking provision for rental cargo e-bikes. Micro mobility hubs and urban logistics hubs should be located and designed to minimise any impact on walking and cycling.

Moving goods and materials on appropriate roads

14.68 The roads considered to be most suitable for use by lorries and other heavy goods vehicles are those in the Transport for London Road Network and others designated as Major Roads. Heavy goods vehicles should therefore be routed to minimise the use of district and local roads for the movement of goods, particularly roads which provide primarily for access to residential properties.

Transport assessments

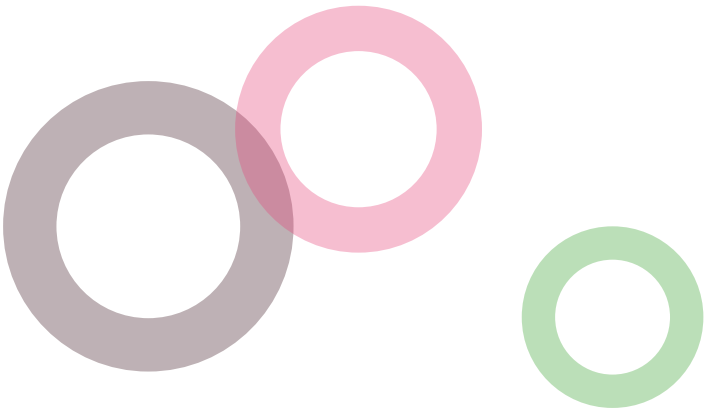
14.69 Where the transport implications of proposals are considered to be significant, we will require a full Transport Assessment to examine the impact on transport movements arising from the development. In some circumstances where the transport implications are less severe, but still significant, we would require a Transport Statement rather than a full Transport Assessment. Camden Planning Guidance on Transport provides guidance on the scale of development that is likely to generate a significant travel demand and therefore requires either a Transport Assessment or a Transport Statement. It also sets out how Transport Assessments should be prepared and what they should cover.

14.70 For smaller applications that do not require a full Transport Assessment or Transport Statement, some information will still need to be submitted as part of the planning application process where proposals may have a transport impact. This should be supplied either as part of a supporting transport note, or incorporated into the Design and Access Statement.

14.71 The Council will consider information received within Transport Assessments, Travel Plans and Delivery and Servicing Management Plans to assess the transport impacts of development. In instances where existing or committed capacity cannot meet the additional need generated by the development, the Council will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts.

Delivery and Servicing Management Plans

14.72 In order to proactively manage delivery and servicing arrangements, the Council will seek Delivery and Servicing Management Plans for all major developments, and for those developments where it is identified through a Transport Assessment that the scheme is likely to impact on amenity or the safe and efficient operation of the transport network. The Council will also seek to secure Delivery and Servicing Management Plans for any development required to submit a Travel Plan. Developers will be expected to submit a draft Delivery and Servicing Management Plan as part of the planning application process, with a final Delivery and Servicing Management Plan required to be submitted once planning permission has been granted. This will be secured as a planning obligation via a section 106 legal agreement.



Construction management plans

14.73 The Council will expect all major planning applications to produce a Construction Management Plan, with the need for a Construction Management Plan for minor developments determined on a case-by-case basis, depending on the nature of the proposed construction works, the site location and surrounding context. Construction Management Plans should be submitted at the earliest opportunity in the planning application process and include significant input from the contractors appointed to undertake the work. Construction Management Plans will be secured via planning obligations and should, at the very latest, be submitted after a planning application is approved, and well before a development commences.

14.74 Further information on the content and application of these documents is set out in the supporting text to Policy A1 (Protecting Amenity) and our Camden Planning Guidance on Transport, Amenity, and Developer Contributions and developers will be expected to have due regard to this guidance when progressing development schemes in Camden.

15 Delivery and Monitoring

15 Chapter

Delivery and monitoring

15.1 This section provides an overview of the ways the Council will deliver the Local Plan's vision, objectives and policies.

15.2 It focuses on how we will:

- work with our partners to deliver our plans;
- ensure necessary infrastructure is provided;
- make use of planning obligations and the Community Infrastructure Levy (CIL); and
- monitor the delivery of the Local Plan.

15.3 A key mechanism for delivering the Local Plan will be the Council's decisions on planning applications. The policies and site allocations in the Local Plan, Area Action Plans, the London Waste Plan and neighbourhood plans will provide the framework for these decisions. We will also take account of the Council's supplementary planning documents (including Camden Planning Guidance, planning briefs and frameworks) when determining planning applications.

Policy DM 1
Delivery and Monitoring

A. The Council will deliver the vision, objectives and policies of the Local Plan by:

1. working with a range of partners to ensure that opportunities for delivering healthy and sustainable development that maximise community benefit are fully explored;

2. working with relevant providers to ensure that necessary infrastructure is secured to support Camden's development and provide the facilities needed for the borough's communities. Information on key infrastructure programmes and projects in the borough up to 2041 are set out in the Council's Infrastructure Delivery Plan;

3. working proactively in its actions as a landowner and by facilitating land assembly through the use of our planning powers where considered appropriate;

4. using the Community Infrastructure Levy, planning contributions and legal agreements where appropriate to:

   a. support healthy and sustainable development;

   b. secure infrastructure, facilities and services to meet the needs generated by development;

   c. mitigate the impact of development;

5. working with neighbouring boroughs to coordinate delivery across boundaries;

6. securing appropriate scheme implementation (including multi-site developments) and controlling phasing where necessary;

7. requiring applications that amend a consent to comply with all development plan policies, and, where appropriate, secure the delivery of additional requirements using planning obligations; and

8. monitoring the implementation of Local Plan policies and infrastructure provision on a regular basis through the Authority Monitoring Report.

Ensuring necessary infrastructure is provided

15.4 It is vital that the transport facilities and services, utilities and social infrastructure needed in response to development, and to support local communities, is provided, particularly in the parts of the borough that will experience the most growth.

15.5 To support development in the borough, the Council will safeguard and improve essential infrastructure and work with service providers to ensure the timely delivery of new and enhanced infrastructure, to ensure that the quality of life of Camden's residents and workers is improved and not harmed.

Infrastructure delivery

15.6 To support the delivery of the Local Plan, the Council has prepared an Infrastructure Delivery Plan. This sits alongside the Plan and identifies key infrastructure programmes and projects likely to be required to support the delivery of new homes, a successful economy and the creation of sustainable, healthy communities in the borough over the Plan period. The Infrastructure Delivery Plan is not exhaustive and other items will be required, as appropriate, in response to new development in the borough.

15.7 The Infrastructure Delivery Plan sets out the anticipated timing or phasing of infrastructure provision where this is known. This will depend on many factors, including when development takes place, the availability of funding, the timing of major investment, undertaking detailed feasibility studies and, in some cases, planning consent for the infrastructure project itself.

15.8 Some of the items listed in the Infrastructure Delivery Plan are already in the process of being delivered. In other cases, they have been identified in service provider strategies and business plans as likely to be required. These investment plans take into account forecast changes in population and household numbers to identify where future capacity issues may occur. There is more scope for certainty in the next 3-5 years than the longer term as major items of infrastructure have been programmed, costs and means of fundraising have been considered and the broad locations of development are well understood.

15.9 Where relevant, the individual sections in the Local Plan also contain details of infrastructure requirements and mechanisms for delivery.

Working with developers and providers

15.10 Securing development in accordance with the Council's planning policies through the planning application process is the key mechanism for achieving many of the objectives of the Local Plan, together with appropriate enforcement of planning law.

15.11 The Council will encourage dialogue between developers and service providers, including the services provided by the Council itself, to ensure that new infrastructure provision properly acknowledges the opportunities and constraints of the specific development site and its surroundings. For example, it will be important that developers take account of the opportunities to link their schemes with surrounding green infrastructure or consider what infrastructure such as water, wastewater, digital or utilities infrastructure need to be in place ahead of development.

15.12 Where necessary, development should be phased to ensure it comes forward at the same time as, or following the provision of, infrastructure. Development which is poorly programmed can lead to infrastructure problems and can negatively impact the local population.

Council as landowner

15.13 The Council as a landowner can promote and encourage specific development on its land, for example through the Community Investment Programme (CIP). The Community Investment Programme (CIP) is the Council's plan to invest in schools, homes and community facilities in the borough. Further information on CIP projects is available on the Council's website.

15.14 The Council may also look to promote or encourage uses on land adjacent to Council land by entering into partnership agreements.

Land assembly

15.15 The Council can play a positive role in the implementation of the Plan by facilitating development through use of its land assembly powers, where considered appropriate. Land assembly can be a complex and time-consuming process. As a result, the Council will use its powers sparingly, concentrating on priority sites. Council involvement in land assembly is likely to be particularly important at locations where land ownership issues act as a constraint on development and on large sites that offer significant regeneration opportunities. The Council's preferred approach to land assembly will be through negotiation; therefore, use of formal land assembly powers will be a last resort.

Planning contributions

15.16 New development proposals should be sufficiently supported by infrastructure. Both Camden and the Mayor of London make use of the Community Infrastructure Levy (CIL) to help fund infrastructure. The Council will also use planning obligations, in appropriate circumstances and in accordance with the National Planning Policy Framework, to mitigate or compensate for the effects of new development.

15.17 Planning obligations (sometimes called Section 106 agreements) can help to contribute to the success of a development, and assist in achieving the Council's aims for a site, the local area and the borough as a whole.

15.18 They can enhance the quality of a development and ensure it does not give rise to unacceptable planning impacts. A planning obligation will only be sought where it is not possible to deal with the matter through the imposition of a condition on a planning permission, it is considered necessary to make a development acceptable, and it is related to the development. In general terms, planning obligations will be used to fund more site-specific infrastructure than CIL.

15.19 The measures sought through a planning obligation will vary depending on the nature and scale of a development scheme, its location and impacts. The main matters that the Council considers are likely to be addressed through such agreements are:

- on-site provision of:
  - infrastructure to mitigate the direct impacts of development, such as landscaping, servicing and direct access (these may also be addressed through S278 agreements), particularly for major developments;
  - affordable housing; and
  - open space and its maintenance (particularly in larger schemes);
- securing contributions towards the provision of off-site affordable housing and open space;
- securing car free housing and the delivery of public transport and active travel improvements;
- tackling climate change and environmental impacts;
- training, skills and regeneration;
- phasing of development; and
- other obligations necessary to making a development acceptable.

15.20 This list is not exhaustive, and development schemes can individually or cumulatively introduce a range of issues, requirements and impacts that may justify the use of planning obligations.

15.21 Pooled contributions will be used when the combined impact of development in an area creates the need for related infrastructure or works. Additional detail on the Council's approach to planning obligations is set out in the Council's Camden Planning Guidance on developer contributions.

Community Infrastructure Levy (CIL)

15.22 The Community Infrastructure Levy (CIL) enables local authorities to raise funds for infrastructure to meet the needs arising from new developments which exceed 100 sqm or add a dwelling. It is based on a formula relating to the type and size of development and is collected when planning permissions for new developments are implemented. The Council will also negotiate planning obligations to mitigate site specific issues and to allow for affordable housing to be delivered, as set out above.

15.23 There are CIL rates for different uses and different parts of Camden which are set out in our Community Infrastructure Levy Charging Schedule. The funds raised can be spent on infrastructure such as community facilities, schools, open spaces, health projects and transport infrastructure. Spending is set out in an annual Section 106 and CIL report. CIL funding priorities are set out in the Camden Infrastructure Funding Statement (IFS), which is also updated annually.

Local element of CIL

15.24 A meaningful proportion of CIL funding should be spent in the neighbourhood where development occurs. Camden has decided to spend 25% of the funding in the relevant local ward, with ward Councillors having a lead role in establishing priorities for and applying to use local CIL funds, in consultation with local communities and neighbourhood forums where these exist. Funds are spent to support the development of the local area by funding:

a. the provision, improvement, replacement, operation or maintenance of infrastructure; or

b. anything else that is concerned with addressing the demands that development places on an area.

15.25 Neighbourhood forums can establish infrastructure priorities (providing detailed projects where possible) in their neighbourhood plan.

15.26 Where a Neighbourhood Plan has been approved at referendum the priorities contained in the Plan that are applicable to the ward should be carried across into the local CIL priorities unless there is a clear reason for doing otherwise, agreed by the Cabinet Member.

15.27 Additional detail on the Council's approach to CIL is set out in our Camden Planning Guidance on developer contributions and the Infrastructure Funding Statement (IFS).

Mayoral CIL

15.28 The Mayor of London also charges a community infrastructure levy, which is used to fund strategic transport projects. The Mayoral CIL is collected by Camden and other boroughs and passed to Transport for London. It is charged across the whole of the borough with higher rates applying to the development of offices, retail and hotels in the Central Activities Zone. Information on Mayoral CIL charges can be found on the Mayor of London's website.

Viability

15.29 Government policy is clear that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.

15.30 Where during the negotiation of a proposed scheme, it is argued that the Council's request for contributions would render development unviable, we will expect developers to provide information on viability through an open-book approach. The Council supports transparency in decision making and will seek the maximum reasonable disclosure of information in viability appraisals having regard to any elements that are commercially sensitive. However, because the provision of certain infrastructure is necessary to make development acceptable in planning terms, there will be instances where reducing contributions on viability grounds would make development unacceptable, either because development cannot come forward without it in physical or safety terms, or because it is necessary to mitigate the impacts of the development.

Working with partners

15.31 Central to the delivery of the Local Plan will be working with our partners and developing new solutions to deliver the Council's Corporate Strategy. During the preparation of this Local Plan the Council has worked with key delivery partners to ensure the strategy and policies also reflect their aspirations, plans and spending programmes where appropriate.

15.32 Camden has a range of distinctive neighbourhoods that are integral to its character which the Local Plan seeks to protect and enhance. Our visions and objectives for areas such as Euston and Fitzrovia are set out in Area Action Plans, which have been developed in conjunction with our partners and the communities and business stakeholders.

15.33 Partners we will work with include:

- neighbourhood forums, whom the Council will support and advise on developing neighbourhood plans to provide additional locally specific policies. Once neighbourhood plans are approved, they form part of the statutory Development Plan and are used alongside other Council adopted planning documents when making decisions on planning applications in the neighbourhood area. Please see our website for more information on the areas in Camden where neighbourhood planning is taking place;
- local community groups, residents and businesses. The Council's Statement of Community Involvement sets out how we involve the local community and other stakeholders in the preparation and implementation of our planning policy documents and in the consideration of planning applications;
- business partners, Business Improvement Districts and landowners;
- central London Partners, such as central London boroughs and Central London Forward, for matters concerning London's Central Activity Zone (CAZ); and
- neighbouring boroughs.

Flexible implementation of the Local Plan

15.34 The Local Plan needs to be flexible enough to ensure that the Council's vision and objectives for Camden can be delivered in future years despite changing circumstances. This is particularly important with regards to delivering our approach to Camden's growth and meeting the borough's needs for homes, jobs, services and infrastructure.

15.35 There is a need for sensitive and flexible implementation. However, while our plans must be suitably flexible, it is vital that the level of flexibility does not create uncertainty, or harm the overall delivery of the Local Plan. This Local Plan has therefore been prepared to be flexible enough to cope with a changing world, while ensuring our vision and objectives for the borough are delivered.

15.36 Sometimes the Local Plan's implementation will rely upon appropriate alternative or amended approaches to deal with emerging issues and changing circumstances. Individual policies in this Local Plan include an element of flexibility where appropriate, in particular in relation to the consideration of the viability of development schemes, the feasibility of particular measures and site-specific issues.

Amendments to existing consents

15.37 Where an application to vary an existing planning consent is submitted, the Council will consider all development plan policies and any requirements arising from the scheme overall (as amended). Where these requirements are greater than those from the original permission, the Council will seek a planning obligation to secure the delivery of the additional requirements. Where requirements have increased since the original permission, the Council will apply the increased requirements to any additional floorspace arising from the application to vary the approved scheme only.

Monitoring

15.38 The Council will monitor the effectiveness of the Local Plan in delivering its objectives by regularly assessing its performance against a series of indicators. This will be reported in the Council's Authority Monitoring Report, which is available to view on the Council's website.

15.39 Regular monitoring will measure progress in delivering the Local Plan and identify any aspects that are not being achieved as planned and any changing circumstances that may affect implementation. This will allow us to adjust the application of policies where appropriate and, if necessary, bring forward alternative approaches or policies.

Appendices

Appendix 1: Local Plan Policy Replacement Schedule

When adopted, the new Local Plan will supersede the Camden Local Plan 2017, the Site Allocations Local Plan 2013 (excluding sites within the Euston Area Plan area), and Opportunity Sites 1 to 14 (inclusive) in the Fitzrovia Area Action Plan.

A policy replacement schedule is set out below.

Camden Local Plan 2017

Policy Reference	New Local Plan replacement policy
G1 Delivery and location of growth	DS1 – Delivering Healthy and Sustainable Development S1 – South Camden C1 – Central Camden W1 – West Camden N1 – North Camden H1 - Maximising Housing Supply
H1 - Maximising Housing Supply	H1 – Maximising Housing Supply
H2 - Maximising the supply of self-contained housing from mixed use schemes	H2 – Maximising the supply of self-contained housing from mixed use schemes
H3 - Protecting existing homes	H3 – Protecting existing homes
H4 - Maximising the supply of affordable housing	H4 – Maximising the supply of affordable housing
H5 - Protecting and improving affordable housing	H5 – Protecting and improving affordable housing
H6 - Housing choice and mix	H6 – Housing choice and mix
H7 - Large and small homes	H7 - Large and small homes
H8 - Housing for older people, homeless people and vulnerable people	H8 – Housing for older people, homeless people and other people with care or support requirements
H9 - Student housing	H9 – Purpose built student accommodation
H10 - Housing with shared facilities	H10 – Housing with shared facilities
H11 - Accommodation for travellers	H11 – Accommodation for travellers

Camden Local Plan 2017 (continued)

Policy Reference	New Local Plan replacement policy
C1 Health and well-being	SC1 – Improving health and well-being
C2 Community facilities	SC3 – Social and community infrastructure
C3 Cultural and leisure facilities	SC6 – Cultural facilities
C4 Public houses	SC7 – Public Houses
C5 Safety and security	A2 – Safety and Security
C6 Access for all	SC2 – Access for All
E1 Economic development	IE1 – Growing a successful and inclusive economy IE2 – Offices IE3 – Industry S1 – South Camden S3 – Hatton Garden Jewellery Industry Area C1 – Central Camden W1 – West Camden N1 – North Camden
E2 Employment premises and sites	IE1 – Growing a successful and inclusive economy IE2 – Offices IE3 – Industry IE4 – Affordable workspace S3 – Hatton Garden Jewellery Industry Area C1 – Central Camden
E3 Tourism	IE5 – Hotels and Visitor Accommodation
A1 Managing the impact of development	A1 – Protecting Amenity
A2 Open space	SC4 – Open Space NE1 – The Natural Environment
A3 Biodiversity	NE1 – The Natural Environment NE2 – Biodiversity NE3 – Tree planting and protection
A4 Noise and vibration	A4 – Noise and Vibration
A5 Basements	D6 – Basements
D1 Design	D1 – Achieving Design Excellence D2 – Tall Buildings D3 – Design of Housing
D2 Heritage	D5 – Historic Environment
D3 Shopfronts	D8 – Shopfronts
D4 Advertisements	D7 – Advertisements and Signage

Camden Local Plan 2017 (continued)

Policy Reference	New Local Plan replacement policy
CC1 Climate change mitigation	CC1 – Responding to the climate emergency CC2 – Retention of Existing Buildings CC3 – Circular Economy and Reduction of Waste CC4 – Minimising Carbon Emissions CC5 – Sustainability Improvements to Existing Buildings CC6 – Energy Use and the Generation of Renewable Energy CC7 – Heat Networks T1 – Safe, Healthy and Sustainable Transport
CC2 Adapting to climate change	D1 – Achieving Design Excellence CC1 – Responding to the Climate Emergency CC6 – Energy Use and the Generation of Renewable Energy CC8 – Overheating and Cooling CC11 – Sustainable Drainage
CC3 Water and flooding	NE4 – Water Quality CC9 – Water Efficiency CC10 – Flood Risk CC11 – Sustainable Drainage
CC4 Air quality	A3 – Air Quality
CC5 Waste	CC3 – Circular Economy and Reduction of Waste D1 – Achieving Design Excellence

Camden Local Plan 2017 (continued)

Policy Reference	New Local Plan replacement policy
TC1 Quantity and location of retail development	S1 – South Camden C1 – Central Camden W1 – West Camden N1 – North Camden IE6 - Supporting designated centres and essential services
TC2 Camden's centres and other shopping areas	IE6 – Supporting designated centres and essential services
TC3 Shops outside of centres	IE6 – Supporting designated centres and essential services
TC4 Town centre uses	IE6 – Supporting designated centres and essential services
TC5 Small and independent shops	IE6 – Supporting designated centres and essential services
TC6 Markets	IE10 – Markets
T1 Prioritising walking, cycling and public transport	T2 – Prioritising Walking, Wheeling, and Cycling T3 – Public Transport
T2 Parking and car-free development	T5 – Parking and Car-free Development
T3 Transport infrastructure	T1 – Safe, Healthy and Sustainable Transport
T4 Sustainable movement of goods and materials	T6 – Sustainable Movement of Goods, Services, and Materials
DM1 Delivery and Monitoring	DM1 – Delivery and Monitoring

Site Allocations Plan 2013

Policy Reference	New Local Plan replacement policy
Site 1 – King's Cross Growth Area	Not applicable – Development largely complete
Site 2 – Camden Town Hall Extension	Not applicable – Development completed
Site 3 – Lighthouse block, Pentonville Rd	Not applicable – Development completed
Site 4 – 277a Grays Inn Road	Not applicable – Development completed
Site 5 – Midland Road Site, Land to rear of The British Library	S15 - Land to the rear of the British Library
Site 6 – 4 St Pancras Way (St Pancras Hospital)	S8 – St Pancras Hospital
Site 7 – 103 Camley Street	Not applicable – Development completed
Site 8 – Land west of Westminster Kingsway College, 45 Sidmouth Street	Not applicable – Development completed
Site 9 – Euston Station, Euston Road	Site is within the Euston Area Plan (EAP) area. As such, the existing Site Allocation Plan 2013 policy will continue to be part of the development plan until a revised EAP is adopted.
Site 10 – BHS Warehouse, 132 - 140 Hampstead Rd and 142 Hampstead Rd	Site is within the Euston Area Plan (EAP) area. As such, the existing Site Allocation Plan 2013 policy will continue to be part of the development plan until a revised EAP is adopted.
Site 11 – Granby Terrace Depot	Site is within the Euston Area Plan (EAP) area. As such, the existing Site Allocation Plan 2013 policy will continue to be part of the development plan until a revised EAP is adopted.
Site 12 – 110 - 122 Hampstead Road (Former National Temperance Hospital)	Site is within the Euston Area Plan (EAP) area. As such, the existing Site Allocation Plan 2013 policy will continue to be part of the development plan until a revised EAP is adopted.
Site 13 – 1-39 Drummond Crescent (Euston Traffic Garage)	Not applicable – Development completed
Site 14 – Westminster Kingsway College, Regent's Park Centre, Longford Street	Site is within the Euston Area Plan (EAP) area. As such, the existing Site Allocation Plan 2013 policy will continue to be part of the development plan until a revised EAP is adopted.

Site Allocations Plan 2013 (continued)

Policy Reference	New Local Plan replacement policy
Site 15 – Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East / Augustus St	Site is within the Euston Area Plan (EAP) area. As such, the existing Site Allocation Plan 2013 policy will continue to be part of the development plan until a revised EAP is adopted.
Site 16 – St Giles Circus	Not applicable – Development completed
Site 17 – The Royal Mail Sorting Office, 21-31 New Oxford Street	Not applicable – Development completed
Site 18 – Land Bound by New Oxford Street, Museum Street and West Central Street	Partly completed development and partly under Policy S17 – Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street.
Site 19 – 12-42 Southampton Row & 1-4 Red Lion Square	Policy S16 – Former Central St Martins
Site 20 – Land Bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row & Brownlow Street	Not applicable - No substantial development envisaged
Site 21 – Senate House (north block) Malet Street	Policy S31 - Senate House (NE quadrant), Malet Street
Site 22 – 26 Gordon Square and 15 Gordon Street	Not applicable – Development completed
Site 23 – 20 - 22 Gordon Street/Wates House	Not applicable – Development completed
Site 24 – Phoenix Place	Not applicable – Development completed
Site 25 – Herbal House, 10 Back Hill	Not applicable – Development completed
Site 26 – Land bounded by Wren Street, Pakenham Street, Cubit Street, Langton Walk	Policy S14 – Land at Pakenham Street and Wren Street
Site 27 – 187-199 West End Lane	Not applicable – Development completed
Site 28 – 156 West End Lane	Not applicable – Development under construction

Site Allocations Plan 2013 (continued)

Policy Reference	New Local Plan replacement policy
Site 29 – O2 Centre Car Park	Policy W2 – O2 Centre, carpark and car showroom sites and 14 Blackburn Rd
Site 30 – 100 Avenue Road, Swiss Cottage	Policy W12 – 100 Avenue Road
Site 31 – Belsize Road Car Park	Not applicable – Development completed
Site 32 – Hawley Wharf, Water Lane and 39-45 Kentish Town Road	Not applicable – Development completed
Site 33 – 202-212 Regent's Park Road (Roundhouse car park)	Not applicable – Development completed
Site 34 – 2-12 Harmood Street and Rear of 34 Chalk Farm Road	Not applicable – Development completed
Site 35 – Bangor Wharf, Georgiana Street	Policy S10 – Bangor Wharf and Eagle Wharf
Site 36 – 57 - 71 Pratt Street, 10 - 15 Georgiana Street and Royal College Street	Site unavailable
Site 37 – 24 - 58 Royal College Street	Policy S7 – 24-28 Royal College Street (Parcelforce and ATS Tyre Site)
Site 38 – 115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery	Policy C23 – Former flats 121 – 129 Bacton, Haverstock Road
Site 39 – 19-37 Highgate Road, Day Centre and 25 and 37 Greenwood Place	Not applicable – Development under construction
Site 40 – Kentish Town Police Station, 10A,12A, 14 Holmes Road	Policy C4 – Kentish Town Police Station
Site 41 – Fire Station, 20 Highgate Road	Policy C6 – Kentish Town Fire Station
Site 42 – Former Nurses Hostel, 29 New End	Not applicable – Development completed
Site 43 – 40-49 St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir	Not applicable – Development completed

Fitzrovia Area Action Plan 2014

Policy Reference	New Local Plan replacement policy
Opportunity Site 1 (Astor College)	Not applicable – Development completed
Opportunity Site 2 (Middlesex Hospital annex)	Policy S27 – Middlesex Hospital Annex
Opportunity Site 3 (Arthur Stanley House)	Not applicable – Development completed
Opportunity Site 4 (Tottenham Mews)	Not applicable – Development completed
Opportunity Site 5 (Rosenheim Building)	Not applicable – Development completed
Opportunity Site 6 (Odeon Site)	Not applicable – Development completed
Opportunity Site 7 (Royal Ear Hospital)	Not applicable – Development completed
Opportunity Site 8 (Medical Students' Union)	Not applicable – Development completed
Opportunity Site 9 (Central Cross)	Not applicable - No substantial development envisaged
Opportunity Site 10 (6-17 Tottenham Court Road)	Not applicable - Site unavailable. No development expected
Opportunity Site 11 (80 Charlotte Street)	Not applicable – Development completed
Opportunity Site 12 (Asta House)	Not applicable – Development completed
Opportunity Site 13 (Network Building)	Not applicable – Development completed
Opportunity Site 14 (61-63 TCR, 1-7 and 11-13 Goodge St)	Not applicable – Development completed

Appendix 2: Access Measures

Policy SC2 (Access for All) sets out our approach to delivering access for all in Camden, to ensure that developments are designed to promote access and inclusion, and that the barriers which prevent everyone from accessing facilities and opportunities are removed.

The table below sets out a number of measures which, if implemented successfully, should create an inclusive and accessible environment in the borough, and developers will be expected to have due regard to this.

Table 13 - Access Measures

Moving around	• Level or adequately ramped • Sufficient width and obstacle free • Firm, durable, slip-resistant surfaces • Well-lit and clearly identified • Dropped kerbs with tactile surfaces • Contrasting colour on bollards and street furniture • Clear, accessible and easy to read signage • Clearly displayed building name and number
Parking	• Suitably designed and marked spaces • Spaces as close as possible to accessible entrances • Dropped kerbs onto a level obstruction-free route to the accessible entrance • Appropriately located and signed dropping off point
Entrances	• One entrance door that is accessible to all • Level or adequately ramped. If steps are necessary, they should have appropriately designed handrails • Ramped gradients as shallow as possible • Level area in front of the entrance door • Level threshold • Canopy over manual doors • Easy to open doors • Provision of electronic entrance doors • Sufficiently wide doors • Doors to have contrast • Provision of buzzers and two way intercoms that are accessible for d/Deaf and visually impaired people. These should be located at an appropriate height
Lobbies	• Need to be of a size and shape to allow a wheelchair user to move clear of one door before opening the second door • Floor surface that does not impede movement, avoid dips or changing surfaces, including mats • Entrance matting to be sufficient to allow at least one whole wheel rotation of a wheelchair wheel and sufficient to not require loose matting in inclement weather

Table 13 - Access Measures

Receptions	• Provide hearing enhancement systems • Provide lowered wheelchair accessible counters • Should be easily identifiable • Provide unisex wheelchair accessible WC before security line • Reduce hard surfaces that cause noise reverberation
Levels	• Provide a lifting device and suitable stairs to all storeys above and below ground – in new build this should be a full passenger lift • Ramps for internal changes within a storey • Any raised areas to be accessible to everyone
Circulation	• Adequately wide corridors • Sufficiently wide doors • Clear, well-lit signs which include universally recognised pictograms • Colour contrast within the building • Corridors free of obstructions
Buildings / Facilities	• Adequate provision of wheelchair accessible unisex toilets • Provision of changing places toilets where appropriate • Provision of an enlarged cubicle in separate sex toilets • Where shower and changing facilities are included provide wheelchair accessible facilities • Appropriately designed and positioned sockets and switches • Provision of clear, accessible and easy to read signage • Visual alerts / information for d/Deaf people • Fire alarms that provide for the needs of d/Deaf people – use of flashing lights during alarm 'sound' • Good colour contrast • Provide suitable egress for all • All shared amenities must be designed to be accessible to all • Public buildings should include sensory areas / quiet rooms for neurodiverse people • Provision of bin storage areas that can be easily accessed and used by disabled residents • Provision of wheelchair accessible hotel bedrooms and accessible student accommodation in relevant developments
Public spaces	• Designed to be accessible and easy to move around, with step free routes. • Include good lighting, to create a safe and welcoming environment • Provide seating and rest areas that meet the needs of disabled people • Include quiet spaces that are safe, welcoming and accessible, to meet the needs of neurodiverse people • Include play equipment and sensory areas to meet the needs of d/Deaf, disabled, blind and neurodiverse children and teenagers • Provide clear, accessible signage

Appendix 3: Defining Poor Air Quality

Policy A3 (Air Quality) states that the Council will resist:

- applications for sensitive uses in areas of particularly poor air quality; and
- developments that introduce sensitive occupiers in locations of poor air quality, unless they are designed to substantially mitigate the impact.

The definitions of poor and particularly poor air quality are set out in the table below, consistent with the Council's Air Quality Action Plan. These may be updated through the Council's Planning Guidance to reflect future Air Quality Action Plans.

All concentration limit values are annual means (that is, the average concentration as measured throughout the calendar year).

Pollutant	Poor air quality	Particularly poor air quality	Monitoring data
NO_2	>30 µg/m3 - up to and including 2026 And then >20 µg/m3 - from 2027 onwards And then > 10 µg/m3 - from 2035 onwards	>40 µg/m3 - up to and including 2026 And then >30 µg/m3 - from 2027 onwards And then > 20 µg/m3 - from 2035 onwards	The air quality assessment should include a pre-assessment using either Local Atmospheric Emissions Inventory (LAEI) data or local diffusion tube or automatic monitoring data, Monitoring Certification Scheme (MCERTS reference equivalent) if considered by the Council to be suitably representative of the application site. If detailed modelling is required, background concentrations either from Automatic monitoring sites or DEFRA background concentrations for the current year – whichever reports higher pollution levels - should be used. Detailed modelling should not predict improvements to future years (emissions or background concentrations).
$PM_{2.5}$	>10 µg/m3 And then >5 µg/m3 - from 2035 onwards	>12 µg/m3 And then >10 µg/m3 - from 2035 onwards	The air quality assessment should include a pre-assessment, using either LAEI or local automatic monitoring data, Monitoring Certification Scheme (MCERTS reference equivalent) if considered by Camden to be suitably representative of the application site. If detailed modelling is required, background concentrations either from Automatic monitoring sites or DEFRA background concentrations for the current year – whichever reports higher pollution levels - should be used. Detailed modelling should not predict improvements to future years (emissions or background concentrations).

Appendix 4: Noise Thresholds

The significance of noise impact varies dependent on different noise sources, receptors and times of operation. The Council's thresholds for noise and vibration therefore evaluate noise impact in terms of various 'effect levels' described in the Noise Policy Statement for England, National Planning Policy Framework and Planning Practice Guidance:

- **NOEL** – No Observed Effect Level: The level of noise exposure below which no effect can be detected. In simple terms, no effect on health and quality of life detectable due to noise.
- **LOAEL** – Lowest Observed Adverse Effect Level: The level of noise exposure above which adverse effects on health and quality of life can be detected.
- **SOAEL** – Significant Observed Adverse Effect Level: The level of noise exposure above which significant adverse effects on health and quality of life occur.

Three basic design criteria have been set for proposed developments. These are aimed at guiding applicants on the degree of detailed consideration needed to be given to noise in a planning application. The design criteria outlined below are defined in the corresponding noise tables. The values will vary depending on the context, type of noise and sensitivity of the receptor:

- **Green** – where noise is considered to be at an acceptable level.
- **Amber** – where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development.
- **Red** – where noise is observed to have a significant adverse effect.

Vibration

The development should endeavour to achieve, in all reasonably foreseeable circumstances, predicted vibration, expressed as VDVs, at residential dwellings no greater than the levels given in Table A for the stated day and night periods. These levels are in the range for low probability of adverse comment. It is assumed that existing vibration levels are minimal. If existing vibration levels are high, the criteria will need to be revised.

Table A: Vibration levels

Place and time	Vibration limit
Residential buildings day-time (07:00 – 23:00)	0.4 VDV $m/s^{-1.75}$
Residential buildings night-time (23:00 to 07:00hrs)	0.2 VDV $m/s^{-1.75}$
For offices and workshops multiplying by factors of 2 and 4 respectively should be applied to the above vibration dose values for day-time	

Re-radiated noise, as a result of vibration from adjacent railways and other sources, shall not exceed 35 dB LAmax(slow) within habitable residential rooms.

Proposed developments likely to be sensitive to noise

Special consideration will need to be given to noise sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise likely to have an adverse effect. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced or likely to be experienced.

Camden will normally seek to achieve the design noise levels contained in Table 4 of BS8233:2014 in all noise sensitive rooms. It should be noted that the acoustic integrity of the building envelope will be compromised in the event windows are opened for ventilation purposes, typically reducing the insulation to no more than 10 to 15 dB(A). The use of good acoustic design should aspire to achieve the internal design levels in noise sensitive rooms with windows partially open, although on certain sites Camden we may agree to assess the proposal assuming windows are closed.

Table B: Noise levels applicable to noise sensitive residential development proposed in areas of existing noise

Dominant Noise Source	Assessment Location	Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Anonymous noise such as general environmental noise, road and traffic and rail traffic~	1m from a noise sensitive façade	Day	<50dBA L Aeq,16hr	50-72dBA L Aeq,16hr	>72dBA L Aeq,16hr*
		Night	<40dBA L Aeq,8h	40-72dBA L Aeq 8-hour <82dBA L AFmax	>72dBA L Aeq,8hr* >82dBA L AFmax
	Inside a resting room (e.g. living room)	Day	<35dBA L LAeq 16	35-45dBA L Aeq,16hr	>45dBA L Aeq,16hr
	Inside a sleeping room (e.g. bedroom)	Day	<35dB L Aeq,16hr	35-45dB L Aeq,16hr	>45dB L Aeq,16hr
		Night	<30dB L Aeq,8hr <45dB L AFmax	30-40dB L Aeq,8hr 45dB-73 dB L AFmax	>40dB L Aeq,8hr >73 dB L AFmax
	Inside a dining room	Day	<40dB L Aeq,16hr	40-45dB L Aeq,16hr	>45dB L Aeq,16hr
	Outdoor living space (free field)	Day	<50dB L Aeq,16hr	50-55dB L Aeq,16hr	>55dB L Aeq,16hr
Non-anonymous noise	See guidance note on non-anonymous noise				

*LAeq, T values specified for outside a bedroom window are façade levels

The levels given above are for dwellings, however, levels are use specific and different levels will apply dependent on the use of the premises. The Council will also take into account the likely times of occupation for types of development and the noise levels will be amended according to the times of operation of the establishment under consideration.

Industrial and commercial noise sources

A relevant standard or guidance document should be referenced when determining values for LOAEL and SOAEL for non-anonymous noise. Where appropriate and within the scope of the document, it is expected that British Standard 4142:2014 'Methods for rating and assessing industrial and commercial sound' (BS 4142) will be used. For such cases, a 'Rating Level' of 10 dB below background (15dB if tonal components are present) should be considered as the design criterion.

Table C: Noise levels applicable to proposed industrial and commercial developments (including plant and machinery)

Existing noise sensitive receptor	Assessment Location	Design Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Dwellings**	Garden used for main amenity (free field) and outside living or dining or bedroom window (façade)	Day	'Rating level' 10dB* below background	'Rating level' between 9dB below and 5dB above background	'Rating level' greater than 5dB above background
Dwellings**	Outside bedroom window (façade)	Night	'Rating level' 10dB* below background and no events exceeding 57dBLAmax	'Rating level' between 9dB below and 5dB above background or noise events between 57dB and 88dB LAmax	'Rating level' greater than 5dB above background and/or events exceeding 88dBLAmax

*10dB should be increased to 15dB if the noise contains audible tonal elements (day and night). However, if it can be demonstrated that there is no significant difference in the character of the residual background noise and the specific noise from the proposed development then this reduction may not be required. In addition, a frequency analysis (to include the use of Noise Rating (NR) curves or other criteria curves) for the assessment of tonal or low frequency noise may be required.

**levels given are for dwellings; however, levels are use-specific and different levels will apply dependent on the use of the premises.

The periods in Table C correspond to 0700 hours to 2300 hours for the day and 2300 hours to 0700 hours for the night. The Council will take into account the likely times of occupation for types of development and will be amended according to the times of operation of the establishment under consideration.

There are certain smaller pieces of equipment on commercial premises, such as extract ventilation, air conditioning units and condensers, where achievement of the rating levels (ordinarily determined by a BS:4142 assessment) may not afford the necessary protection. In these cases, the Council will generally also require a NR curve specification of NR35 or below, dependent on the room (based upon measured or predicted Leq,5mins noise levels in octave bands) 1 metre from the façade of affected premises, where the noise sensitive premise is located in a quiet background area.

Entertainment noise

Assessments for noise from entertainment and leisure premises must include consideration for amplified and unamplified music, human voices, footfall, vehicle movements and other general activity. Appropriate metrics must be used to measure and assess the noise impact including LAeq and LAmax metrics and appropriate frequency spectrum. Planning permission will not be granted in instances where it is not possible to achieve suitable and sufficient internal noise levels with reference to the most up to date and appropriate guidance within proposed noise sensitive receptors despite appropriate mitigation proposals due to the totality of noise from existing entertainment venues.

Table D: Noise levels applicable to proposed entertainment premises (customer noise)

Existing noise sensitive receptor	Assessment Location	Design Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Dwellings	Garden used for amenity (free field))	Day	The higher of 55dB LAeq,5min Or 10dB below existing LAeq,5min Without entertainment noise	56dB to 60dB LAeq,5min Or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The higher of 61dB LAeq,5min Or 2dB below existing LAeq,5min Without entertainment noise
Dwellings	Garden used for amenity (free field)	Evening	The higher of 50dB LAeq,5min Or 10dB below existing LAeq,5min Without entertainment noise	51dB to 55dB LAeq,5min Or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The higher of 56dB LAeq,5min Or 2dB below existing LAeq,5min Without entertainment noise
Dwellings	Garden used for amenity (free field)	Night	The higher of 45dB LAeq,5min Or 10dB below existing LAeq,5min Without entertainment noise	46dB to 50dB LAeq,5min Or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The higher of 51dB LAeq,5min Or 2dB below existing LAeq,5min Without entertainment noise

For entertainment and plant noise, rating curves should be measured as a 15 minute linear Leq at the octave band centre frequencies 31.5 to 8 KHz.

- wNR 20 in bedrooms (23:00 to 07:00 hours).
- NR 25 in all habitable rooms (07:00 to 23:00 hours).

All measurements shall be undertaken with windows open or closed (whichever makes the music seem louder), or with alternatively provided acoustic ventilation over and above “background” ventilation.

We recommend that, in advance of any noise surveys, applicants seek advice from the Council’s Environmental Health service on the location of measurements and the nearest noise sensitive receptor. Further detail is provided in Camden Planning Guidance on Amenity and developers will be expected to have due regard to this.

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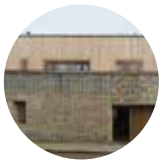
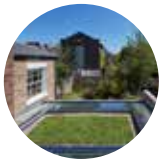
	Max Fordham House	310	Tim Crocker
	Dartmouth Park House	313	Alan Williams
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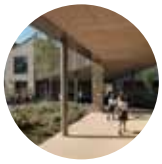	Kingsgate Primary School	389	Tim Crocker
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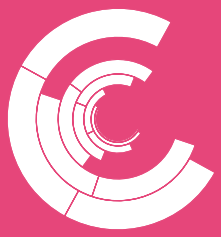

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Planning Policy
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Email: PlanningPolicy@camden.gov.uk

Camden