

Camden Local Plan

Regulation 22(1)(c) Consultation Statement

October 2025

Introduction

The London Borough of Camden is in the process of preparing a new Local Plan. The new Camden Local Plan sets out the Council's vision for future development in Camden over the next 15 years to 2041 and includes the planning policies and site allocations to help achieve this.

This Consultation Statement summarises the public consultation and engagement that was undertaken on the Camden Local Plan Proposed Submission Draft in 2025 (Regulation 19 stage) and the draft Camden Local Plan (Regulation 18 Stage) in 2024. It also sets out the early consultation and engagement that was undertaken to inform the development of the draft Camden Local Plan. For ease, the Consultation Statement is presented in five parts:

- Part 1 – Main issues raised through the consultation on the Camden Local Plan Proposed Submission Draft (Regulation 19 stage);
- Part 2 – Summary of the responses received on the draft Local Plan (Regulation 18 stage);
- Part 3 – Summary of the early consultation and engagement undertaken to inform the development of the draft Local Plan;
- Part 4 – List of specific and general consultation bodies that we have consulted as part of the preparation of the Local Plan; and
- Part 5 – Statement of fact and statement of representations procedure.

This Consultation Statement has been produced in accordance with Regulation 22 (1(c)) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states that a consultation statement must be produced to show:

- Which bodies and persons were invited to make representations under Regulation 18;
- How these bodies and persons were invited to make such representations;
- A summary of the main issues raised by the representations;
- How those main issues have been addressed in the Local Plan; and
- The number of representations submitted at Regulation 19 stage and a summary of the main issues raised.

The purpose of this statement is also to demonstrate that consultation undertaken as part of the preparation of the draft new Camden Local Plan has been undertaken in accordance both with the relevant Regulations and the Council's Statement of Community Involvement, which sets out how the community can be involved in the preparation of local planning policy documents and decisions on planning applications. The current adopted SCI can be viewed on the Council's website [Other planning policy and guidance - Camden Council](#)

Part 1 - Consultation on the Regulation 19 Camden Local Plan Proposed Submission Draft

The Camden Local Plan Proposed Submission Draft was published for consultation for a period of 8 weeks from 1 May to 27 June 2025, to enable residents, businesses, community groups, landowners and other key stakeholders to share their views on the soundness of the Plan.

The Plan was available to view online on the planning pages of the Council's website, and on 'we are Camden' the Council's consultation hub. Responses were invited to be made using the response form provided on our website and by email and letter.

A hard copy of the Local Plan Proposed Submission Draft was also available to view at the following Camden libraries: Highgate Library, Holborn Library, Kentish Town Library, Pancras Square Library and West Hampstead Library and this was advertised on our website and on the promotional material we sent out.

The consultation on the Local Plan Proposed Submission Draft was widely advertised through the following channels:

- An email sent to our consultation database (1154 contacts), neighbourhood forums and Members. We also asked other services to email their contacts;
- We are Camden consultation page;
- Planning policy webpages and a news article on the Council's website;
- The Council's social media platforms, including Facebook and Twitter;
- Posters sent to libraries and community centres to display;
- A press release was sent to local newspapers, which resulted in a number of news articles;
- An advert in the Ham and High and Camden New Journal;
- A short article about the engagement included in the business newsletter, VAC newsletter, libraries newsletter, friends of Camden's parks newsletter; and climate action newsletter; and an
- Article in our Planning Policy Newsletter.

A list of the 'specific consultation bodies' we consulted with (as stipulated by the Regulations) and the 'general bodies' we consulted with are set out in Part 4 of this report. Details of consultation undertaken with statutory bodies is also set out in the Council's Duty to Co-operate Statement.

In total we received approximately 2,060 comments on the Local Plan from 695 respondents. We also received four petitions in relation to Site Allocation C27 Land adjacent to Constable House and one petition in relation to the relocation of the Regis Road recycling centre to the Kentish Town Police Station site. Whilst we received a number of objections and suggested amendments to the Plan, we also received a number of representations in support of the approach we are taking, particularly in relation to climate change, the natural environment, design and the historic environment.

As part of the consultation we have received a few responses that the Council considers to be discriminatory towards certain groups in our community. In these instances, the full representation has not been reported, and a summary of the representation has instead been included.

Summary of Consultation Responses

A summary of the main issues raised through the consultation and the Council's response to these is set out by chapter / policy below.

Whole Plan

Number of representations: approx. 94

Representations received from:

- Department for Education
- GLA
- Historic England
- The Fitzrovia Partnership
- Riverside and Country Partnership
- CPRE
- Kings Cross Central Limited Partnership
- General Projects Ltd
- Transport for London
- British land
- Lendlease and the Euston Landowners
- London Property Alliance

- Natural England
- Metropolitan Police
- SRG Holborn
- Woodland Trust
- Thames Water
- National Grid
- Canal and River Trust
- Lab Tech
- Primrose Hill Conservation Area Advisory Committee
- Royal Free Hospital
- Land Sec
- Tarmac Trading Ltd
- Sport England
- UCL
- Shaftesbury Capital
- Climate Emergency Camden
- Heart of London Business Alliance
- St George West London
- British Museum
- Places for London (Network Rail)
- Regal
- Heidelberg Materials
- Highgate Conservation Area Advisory Committee
- Environment Agency
- Unite Group PLC
- Mount Anvil
- UK Power Networks

Main Issues	Councils Response
There is no recognition of the need for a permanent site for Abacus Belsize Primary School, within the IDP or as site allocations on the proposals map. There should be explicit reference in the IDP to the need for a permanent home for Abacus Primary School. Text needs to be corrected to reflect how the free school presumption operates (as per s10 and s11 of the Education & Inspection Act 2006)	We propose to amend the IDP to address these matters
Introduction to comment. They should be read alongside the Mayor's previous response.	Comment noted.
The strategic objectives of the draft Local Plan are broadly supported. However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan due to the proposed housing targets over the Plan period.	Camden considers that the specific matters raised by the GLA in their representation on the Camden Local Plan Proposed Submission Draft are not matters of general conformity but matters of soundness. General conformity should be considered against the London Plan as a whole. The Local Plan as a whole is considered to be in general conformity with the London Plan as a whole. In addition, the GLA's comments on this matter only refer to supporting text rather than policies. Only the policies in the London Plan constitute the spatial development strategy - the supporting text does not. Therefore, compliance or otherwise with the supporting text is not a general conformity matter. Notwithstanding the matter of general conformity, we have sought to optimise the potential for housing delivery in Camden in line with the London Plan and have allocated all possible sites. We therefore consider our approach is in accordance with the London Plan and is sound. Although we have sought to optimise delivery in line with the London Plan, given the limited availability of sites it would not be possible to do this for a rolled forward London Plan target and therefore that would not be a sound approach.
We note and very much welcome the emphasis on high-quality design in new development, together with appropriate consideration of existing context that runs through the consultation draft. We also note and welcome the various amendments that have been made to individual policies and site allocations as a result of comments and discussions that have taken place since the previous consultation.	Support welcomed.

Main Issues	Councils Response
As currently drafted and for the reasons set out in these representations, it is considered that the plan is not sound and that modifications are necessary.	Comments noted
CPRE generally believe that the Plan is sound, legally compliant, and conforms to the 'Duty to Cooperate'. CPRE supports the Plan's environmental policies particularly the commitment to ensure Camden becomes a net zero borough by 2030. CPRE re-emphasise concerns expressed during the regulation 18 consultation that the Plan should be more ambitious about creating new parks and green spaces across the borough.	Support welcomed. Policies SC4 Open Space and NE1 The Natural Environment support the creation of new open space in Camden and seek to deliver the Council's priorities in relation to this.
KCCLP have identified a number of Soundness issues with the Draft Plan and suggested amendments.	Comment noted.
Our comments made in response to the Regulation 18 consultation remain valid. We would like to reiterate our comments on setting out specific objectives to enhance bus infrastructure through policy. For relevant policies, we encourage the Council to include maps outlining proposed walking and cycle routes for clarity. This includes Policy 51 South Camden, Policy CI Central Camden, Policy WI West Camden, Policy T2 Prioritising Walking, Wheeling and Cycling.	We consider that the Plan clearly sets out the Council's approach to enhancing bus infrastructure in Policy T3 Public Transport and relevant site allocation policies. We do not consider it necessary or appropriate to include detailed walking and cycling maps in the Local Plan. These are available to view online on the Council's website.
There is overarching concern that the impact of the layering of policies and obligations within the Draft Local Plan, which are currently drafted with very little flexibility, will be extremely detrimental to the viability of development going forward. There should be a general policy introduced setting out strategic policy priorities and the need for a flexible and 'on balance' application of policies across the plan as a whole, to respond to changing economic conditions over the plan period and the unknown policy requirements in the new London Plan, and ensure that these strategic priorities are met.	Local Plan policies contain, and are applied, with appropriate flexibility including with consideration of viability on a case-by-case basis. The draft Plan has been subject to a viability assessment to ensure it can be delivered. Paras 1.41 - 1.43 set out which policies the Council considers to be strategic in accordance with the NPPF.
Euston offers one of the most significant development opportunities in central London to create a major new piece of city. This opportunity can only be realised with flexible and pragmatic planning policies in place. Overall, the economics of Euston are challenging. It is crucial that this economic reality is understood and reflected within the review of the Local Plan given that Euston is a strategically important site for the London Borough of Camden that plays a key role achieving the Local Plan targets. It is equally essential that the strategic policies contained within the review of the Local Plan are appropriate and do not undermine the delivery of the Euston masterplan through an inflexible application of policies that do not recognise the characteristics of nationally significant projects with material infrastructure requirements, such as Euston. Lendlease and the Euston Landowners have some major concerns about the Local Plan review, principally in relation to the policies that deal with the optimisation of Euston, tall buildings, flexibility and viability, and the significant cumulative impact of other policies within the Local Plan.	Comments noted
The supporting text to Policy DM1 talks generally about how the individual policies in the Local Plan include an element of flexibility in relation to the consideration of the viability of development. However, we consider that this flexibility has not been expressed clearly enough in Policy H4 regarding affordable housing, Policy EI4 regarding affordable workspace, nor Policy H2 regarding mixed uses.	It is considered that these policies are worded to allow appropriate flexibility to be applied at the decision making stage, and viability to be considered on a case-by-case basis as appropriate.
Lendlease and the Euston Landowners remain concerned that the cumulative impact of the proposed policy requirements is highly likely to undermine the ability to maximise land receipts and contribute toward funding the HS2 station at Euston.	The approach set out in the Local Plan is considered to be appropriate and has been viability tested. The Council's detailed approach to development at Euston is set out in the Euston Area Plan.

Main Issues	Councils Response
Unless a more pragmatic and flexible approach can be found to the expression of the policies within the Local Plan, then there is a risk that development potential and associated benefits at the Euston site will be restricted. The policies as drafted could genuinely deter the delivery of this strategic site, calling into question the soundness of the Local Plan.	The approach set out in the Local Plan is considered to be appropriate and has been viability tested. The Council's detailed approach to development at Euston is set out in the Euston Area Plan.
We recommend streamlining the local plan so it can be better understood and implemented by all.	The content of the Local Plan is considered appropriate.
Concern that, whilst individually well-intended, the impact of the layering of more policies and obligations contained within the draft Local Plan will be extremely detrimental to the viability of development going forward. The proposed additional requirements in the draft Plan create an additional burden, adding substantial time, resource and cost to the preparation of planning applications, which risks further discouraging investment.	The draft Plan is considered to be sound and consistent with national and regional policy. It has been subject to a viability study to ensure its policies can be delivered. Policies contain, and will be applied with, appropriate flexibility and scheme viability will be considered on a case-by-case basis.
As currently drafted, the Local Plan contains little scope for flexibility or 'on balance' judgements that might enable the council to respond to changing economic conditions over the plan period.	It is considered that Plan policies contain appropriate flexibility and are worded to enable 'on balance' judgements to be made to respond to changing circumstances where necessary.
The draft Local Plan needs to provide greater flexibility to deal with emerging national and regional policy updates.	It is considered that the Plan is worded to allow for sufficient flexibility to respond to changing circumstances. The Plan must be consistent with the national and regional policies in place at the time it is adopted. If new regional or national policy emerges prior to the adoption of the Local Plan, this will be a matter for the Inspector to consider as part of the examination.
The following new site allocations were proposed as part of the Reg 19 consultation – • BT Tower; 50- 57 High Holborn, • 18-25 Hand Court, 45-51 Bedford Row & Brownlow Street; • Network Rail maintenance depot on Cedar way; • Holborn Telephone Exchange; and • Highgate Studio.	Limited information has been provided in respect of these sites, so the Council has not been able to determine their suitability, availability and achievability. These sites will be considered through the Local Plan examination, and the Inspector will decide whether or not they should be included in the Plan based on the information provided.
Applicants should consider the Secured by Design principles and guides What Local Plan stipulates is open to interpretation and value engineering - omitting security rated products in favour of cheaper and inferior product can severely compromise the security of a building or development Consultation with the local design out crime officer is essential It is often the case that a developer will look to achieve a BREEAM award where security is far from the main focus. To satisfy BREEAM's security component, a security needs assessment (SNA) is often conducted but the applicant only needs to attempt contact with the Designing Out Crime Officer to satisfy this element. This can mean that crime prevention advice can be absent from the design and build phases. Suggest having a condition for developments to achieve a minimum of Silver SBD award (minimum Bronze for refurbishment and where conservation issues exist) Approved documents do not go far enough in terms of security to mitigate the potential crime risk faced by inner London boroughs Having infrastructure that has been conditioned to achieve SBD can lead to a reduction in calls for the police. It also has a significant impact on anti-social behaviour. Need to deploy well researched and effective design solutions	Comments noted. These are matters regarding the implementation of the policy which we consider are more suitable for inclusion in the relevant supplementary planning guidance (Camden Planning Guidance on Design). We will consider them when we update the guidance.
Areas of the Local Plan that can be improved with a Secure By Design Condition.	Policy A5 Safety and Security sets out the Council's approach to creating a safer borough. Here the supporting text encourages applicants to undertake early engagement with Police Liaison Officers as part of the planning application process. It is not considered necessary to add references to a Secure By Design condition for each of the areas noted. Planning conditions must meet the following

Main Issues	Councils Response
	tests necessary; relevant to planning; relevant to the development to be permitted; enforceable; precise; and reasonable in all other respects.
Suggest placing the following conditions on applications; 1. Prior to construction, proof that the plans can achieve Secured by Design accreditation must be submitted to the design out crime officer and local planning office 2. For the site to achieve a Secured by Design accreditation to a minimum of silver award and to maintain this standard through the life of the development OR To help enhance community safety through the implementation of proven crime prevention products and measures (addressed by SBD) use the following condition: 'whereby the development must achieve SBD accreditation, prior to occupation. SBD guidance is available via www.securedbydesign.com and via an MPS Designing Out Crime Officer OR (example used by Westminster): ' Prior to any above-ground works, details of a full 'Secured by Design' accreditation shall be submitted and approved in writing by the Local Planning Authority. The details shall demonstrate consultation with the Metropolitan Police Designing Out Crime Officers and that each building or such part of a building can achieve accreditation. The development shall only be carried out in accordance with the approved details and maintained thereafter.' 'Prior to the occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features such be permanently retained'	These are matters regarding the implementation of the policy which we consider are more suitable for inclusion in the relevant supplementary planning guidance (Camden Planning Guidance on Design). We will consider them when we update the guidance.
Promote the participation of hotels and student accommodation in Operation Makesafe (to raise awareness of child sexual exploitation and increase reporting and prevention)	These are matters regarding the implementation of the policy which we consider are more suitable for inclusion in the relevant supplementary planning guidance (Camden Planning Guidance on Design). We will consider them when we update the guidance.
The design and layout of these amenities are paramount to encourage legitimate use and promote safety. The DOCO can assist with these spaces and advise how to best utilise specific requirements A well designed park can also benefit and reduce the risk of VAWG offences	These are matters regarding the implementation of the policy which we consider are more suitable for inclusion in the relevant supplementary planning guidance (Camden Planning Guidance on Design). We will consider them when we update the guidance.
Support the majority of the policies on the natural environment and welcome stronger wording from the Reg 18 draft on the protection of ancient & veteran trees; replacement of lost trees; support for native species; encouragement of nature-based solutions Welcome additional requirements for tree retention and planting on many site allocations	Support welcomed
Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. Further detail supplied on this.	Comment noted.
The draft Local Plan is too detailed and does not provide the flexibility to deal with emerging national and regional policy updates. The impact of the layering of policies and obligations within the Draft Local Plan, which are currently drafted with very little flexibility, will be extremely detrimental to the viability of development	The policies in the emerging Plan have been tested through a viability assessment and are not considered to impose an unreasonable burden on development. To a large degree the draft Local Plan takes forward the approach in the current Local Plan which has not prevented development from coming forward in the borough.
Camden Local Plan Review RAG Assessment The following assumptions have been made: • The connection will be made to the closest and largest foul water or combined sewer via gravity. • All surface water will be disposed of at source as per the drainage hierarchy. Should surface water require a connection to the public network, further assessment will be required. • Thames Water have only assessed the existing water and wastewater network and its capacity to serve the proposed development.	Comments noted.

Main Issues	Councils Response
- It is the responsibility of the developer to contact Thames Water ahead of any planning application submission to determine the presence of any Thames Water assets that may require protection, diversions or that may have an impact on the amenity of new occupiers of the development. Notes: - Modelling for network upgrades will proceed once sites have planning approval and there is certainty of development coming forward. - Where network upgrades are required it can take 18 months to 3 years to plan and deliver from the point at which there is certainty of development coming forward.	
The RAG assessment highlights Sewage Treatment Works (STW) and for all site allocations states - We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth.	Comments noted. As this applies to all site allocations and as a scheme is being planned to accommodate the future growth, no additional text is required.
Overall, the draft Camden Local Plan is unsound because a number of the policies require refinement to ensure that they are 'positively prepared', 'justified', 'effective' and 'consistent with national and regional policy', as set out. If the proposed changes suggested are taken forward, we would find the draft Camden Local Plan to be 'sound' in accordance with the NPPF. It is important that these competing policy objectives are considered, in relation to specific development proposals on a site-by-site basis, to ensure that the best possible solutions are delivered and development is not unduly burdened. Accordingly, the competing requirements of the policies in relation to development proposals should be viewed flexibly and in a pragmatic way.	Comments noted.
We consider that subject to minor changes, the Local Plan's approach to sport facilities is proportionate and reasonable Support for the Local Plan's reference to sports facilities in the Strategic Objectives and reference to Active Design Guidance	Support welcomed. We consider that the Local Plan's policies satisfactorily address indoor and outdoor sports facilities and that the approach accords with paragraph 104 of the NPPF.
Inclusive Environments - UCL is strongly supportive of planning policies that are brought forward in the draft Local Plan in relation to inclusive environments, and aspirations for improvements to accessibility for all, as this is fundamental to UCL's objectives when reviewing our estate. - Comments on the inclusive environment were made as part of UCL's representations to the Regulation 18 consultation and still remain valid. Upon further review, UCL wishes to provide some further comments on this topic:	Strong support welcomed. Further comments noted.
It is considered greater emphasis is required throughout the draft Local Plan on measurables relating to inclusive design and accessibility to make sure schemes, including extensive landscaped areas, provide suitable measures in the early design stages to improve accessibility for all users and that the draft policies are effective in delivering their objective.	Policy SC2 Access for all sets out the Councils approach to ensuring that developments are designed to promote access and inclusion and that the barriers which prevent everyone from accessing facilities and opportunities are removed. No change is therefore considered necessary.
Endorse many of the points raised by the London Property Alliance's Camden Working Group which has made representations on behalf of industry.	Comment noted.
Local Plan should designate the West End International Centre using full boundary as defined in London Plan	Local Plan paragraph 3.3 recognises that South Area of Camden includes part of the West End. There is, however, only a small part of the West End that lies within Camden and there are no specific policies for that area in the Plan. It is therefore not considered appropriate to designate a West End boundary, which could be considered confusing given the lack of an associated policy. Established Local Plan and London Plan policies for the Central Activities Zone (CAZ), which include the part of Camden within the West End, are considered to already manage development within the West End in an effective way.
Align policy definitions/designations with those used in Westminster's Local Plan	We consider that the policy designations used on the Policies Map align with those used by Westminster.

Main Issues	Councils Response
Supports the reclassification of the West End as an International Centre for Commerce and Experiences (ICCE) to reflect its full spectrum of economic activity.	We consider this matter is already addressed by Local Plan policies applicable to the Central Activities Zone including Policy IE6 - Supporting designated centres and essential services and Policy SC6 - Cultural facilities. An additional designation is not considered necessary and could be confusing given the lack of an associated policy.
Camden should work with the GLA and Westminster to establish a coordinated planning framework and delivery model for the West End.	This matter is outside of the scope of the Local Plan. The Council already has regular engagement with the Greater London Authority and City of Westminster on strategic cross-boundary planning matters under the 'Duty to Cooperate'. We also note that the Mayor of London intends to set up a Mayoral Development Corporation for Oxford Street which will cover parts of Camden as well as Westminster.
Recommends embedding Mission Teams—multi-agency bodies involving the boroughs, GLA, TfL, Met Police, and Business Improvement Districts—to translate planning frameworks into on-the-ground outcomes.	This matter is outside of the scope of the Local Plan.
The draft Local Plan is not considered sound: It has not been positively prepared and does not provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs in accordance with para 62 of the NPPF Framework. The draft Local Plan is not justified by an appropriate and proportionate evidence base. The Whole Plan Viability Assessment (2025) ('WPVA') is flawed and overstates development viability. The draft Local Plan is not effective and deliverable over the plan period, highlighting the poor record of housing delivery locally. The draft Local Plan is not consistent with national policy. It does not adopt the requirements of Annex 1: Implementation for the purposes of decision-making of the Framework, which requires plans submitted after the 12th March 2025 to apply policies of the Framework.	Comments noted. As this is just a summary of the comments made, a full response is provided to the more detailed comments set out below.
The draft Local Plan does not positively respond to the Governments challenge to get Britain building (due to economic, social and environmental benefits that arise from building more homes). Despite there being a housing emergency, we can find no reference to the current housing needs of 3,137dpa for the borough within the CLPRPSD. The CLPRPSD does not consider why the 2017 Plan has resulted in failure to meet several of the Council's Annual Monitoring Report Indicators. The CLPRPSD has not been prepared positively because it oversteps the 'aspirational' policy objective and does not demonstrate deliverability. The approach taken in the Local Plan Viability Study is flawed. At 580 pages overall, the CLPRPSD as drafted is a blocker to development and not a catalyst for delivery that positively responds to the needs of the borough. The CLPRPSD proposes to add a greater burden on development through more onerous development control standards which do not exist in the London Plan or the Framework. It appears that an inconsistent approach has been applied to site allocations in respect to expectations regarding affordable housing (C7), in conflict with other plan policies e.g. H1 and H5, and the London Plan. Unusually, the site allocations adopt building heights derived from a borough wide Building Heights Study, not building heights which have been approved through the planning application process using detailed townscape and heritage visual assessments. There is a significant gulf between the CLPRPSD and the Framework because it does not follow the required process. Significant revisions and time will be required to ensure the CLPRPSD is sound. Given, the National Development Management Policies (NDMPs) are due for publication this year, it appears that the Council would be better	The Government has made it clear that they expect every Local Authority to have an up-to-date Local Plan to support the delivery of new homes and infrastructure our communities need. We consider that the Camden Local Plan Proposed Submission Draft is both sound and legally compliant. A full response is provided to your detailed comments below.

Main Issues	Councils Response
placed to pause this document and re-draft in accordance with National policy and its local housing needs.	
St George welcomes the opportunity to engage with the Local Plan process. Also noting; comments enclosed should be read in the context of the comments submitted to the Site Allocations Review in January 2022, and the Regulation 18 consultation draft in March 2024. St George submit these representations in the context of the Framework (February 2025) and the many written ministerial statements issued by the Rt Hon Sir Keir Starmer KCB KC MP; and the Rt Hon Angela Rayner, Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government Angela Rayner MP which carry significant weight, and a serious intent for the application of policy. If we have targets that tell us how many homes we need to build, we next need to make sure we are building in the right places. The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes. There is no time to waste. It is time to get on with building 1.5 million homes.	Comments noted.
The Council published the draft Local Plan in April 2025 for consultation which closed on Friday 27th June 2025. St George would welcome the opportunity to discuss these comments in further detail with officers of the Council.	Comments noted.
It is not considered that the draft Local Plan is sound for the following reasons: • It has not been positively prepared • Lack of strategy to meet need in accordance with para 62 of the NPPF. • It is not justified and is based on a flawed Whole Plan Viability Assessment (2025). • It is not effective and deliverable over the plan period. The poor record of housing delivery in the borough requires a fundamental and revised plan to stimulate economic growth and housing delivery, yet the draft Local Plan simply repeats many of the policies of the 2017 Plan. • Given annual housing delivery rates falling well short of minimum requirements, failure of the HDT and without a 5YHLS, the Local Plan is not drafted to address and respond to the shortfall in housing delivery. • It is not consistent with national policy. It appears to have ignored Annex 1: Implementation 'For the purposes of decision-making of the Framework', which requires plans submitted after the 12th March 2025 to apply policies of the Framework. It has failed to determine the minimum number of homes needed, informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. • It is not positively prepared. The use of the 50% affordable threshold is not deliverable in the majority of cases. Its inclusion is not supported by evidence and results in disgruntled public and politicians and delays to determination. • Policies are not clearly written, they are ambiguous, and there are so many obligations on development. • The draft Local Plan also contains inconsistent applications of affordable housing and tall building policies within the site allocations which contradict other policies of the draft Local Plan, and the London Plan and Framework.	We consider that the Camden Local Plan Proposed Submission Draft is both sound and legally compliant.
Support the overall vision and objectives of the Proposed Submission Draft Local Plan. Acknowledges that several suggestions from the March 2024 representation have been incorporated.	Support welcomed

Main Issues	Councils Response
BM's view is that the current Regulation 19 draft version is not sound in parts, because there are policies that are not fully justified, effective or consistent with national policy. A summary of concerns / proposed amendments below: • Recognition of the BM: Explicitly acknowledge the BM's significant cultural and economic role in South Camden (Policy S1). • Flexibility for large Listed Estates in Camden: Climate, design and biodiversity policies (e.g., CC1–CC8, D1, NE2) must accommodate the constraints of heritage buildings like the BM. • Understand operational needs: Exempt cultural institutions from rigid office retention rules (Policy IE2) and allow flexible use of estate space. • Respond to security requirements: Actively support development (Policy A2) that addresses specific threats (e.g., protests). • Privately owned open space: Allow greater flexibility (Policy SC4) for privately-owned open spaces (e.g., BM's south forecourt). • Expansion of Cultural Uses: Amend Policy SC6 to reduce burdens when expanding existing cultural floorspace.	See responses to individual comments below.
We welcome policies, alongside the amendments made in response to our Regulation 18 comments, in the draft Local Plan as these support shifting journeys to sustainable modes and exceed London Plan requirements for car parking and cycle parking. We particularly commend the Council for continuing to have a requirement for car-free development across the borough. Detailed representations are set out below.	Support welcome.
Kings Cross Concrete Plants - These sites fall within an aggregate safeguarding area in the adopted Camden Local Plan meaning that the operations should be protected from encroaching development that would adversely affect the economic viability of the safeguarded rail depot. Request that adequate mineral safeguarding policies are set out in Camden's new local plan and that the sites at King's Cross are safeguarded against inappropriate development that would adversely affect the lawful operations.	Policy S1 South Camden Part Q states that 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." Furthermore Policy T6 Sustainable Movement of Goods, Services and Materials states that the Council will protect existing facilities for waterborne traffic and rail freight traffic. The aggregates safeguarding area is also defined on the Policies Map. Given this, no additional wording is considered necessary.
We believe that the draft local plan is sound in terms of environmental considerations within our remit.	Comment noted.
Please refer to our Regulation 18 response (dated: 13 March 2024) for extensive comments on site allocations in terms of environmental constraints within our remit. These were attached as Appendix one to the said response.	The previous comments were considered in the preparation of the Submission Draft Local Plan and text amended included as considered necessary.
For the reasons set out above, it is considered that the current draft of the DNCLP would not pass those soundness tests and requires comprehensive revisions for it to be made so. As a minimum, the Mayor's recommendation of carrying forward the London Plan target for the entirety of the DNCLP period, pending the strategic review of housing need in the capital and the adoption of an updated London Plan. The Council are encouraged to revisit the capacity assumptions that are set out in the various site allocations and formulate policy that can better accommodate proposals for high quality, high density development and allow positive decision making based on the proposals at the time.	See responses above. The Plan's approach to setting the Local Plan's housing target is consistent with London Plan para 4.1.11. Carrying forward the London Plan target is not considered a sound approach. The capacity of sites allocated in the Local Plan has been assessed on the basis of existing planning permissions, or using a design-led approach consistent with the requirements of the London Plan.

Main Issues	Councils Response
NPPF changes in December 2024 set out clear transitional arrangements for preparing local plans. Plan will only be considered under the previous version of the NPPF is they have reached Reg 19 on or before 12 March 2025. The context for reaching Regulation 19 is set out in footnote , as to when Regulation 19 has been complied with as being each of the proposed submission documents and a statement of representation procedure has been sent to consultation bodies. The plan is therefore neither positively prepared nor consistent with national policy and so is unsound. As the consultation began on the 1st May 2025 and therefore should be prepared in accordance with NPPF 2024. The Local Housing Needs Assessment, despite having a date of May 2025, makes clear at paragraph 1.8 that “this report was developed and written under the NPPF 2023 and therefore has not incorporated any of the changes to the NPPF.” The report goes on to state that the objectively assessed need for housing in Camden as calculated through the standard method “is unlikely to become relevant to Camden for planning purposes.” The reason that it is not used for the purpose of formulating a housing requirement is acknowledged and understood. It is disappointing nonetheless that the Council has appeared to deliberately disregard the Government’s own objective assessment of need as irrelevant.	The Council acknowledges that the relevant version of the NPPF for the purpose of Public Examination of the Local Plan will be the version issued in December 2024. We also note that the Camden Local Housing Needs Assessment 2025 was commissioned and largely written before December 2024. Nevertheless, in London, the "Objectively Assessed Need" is calculated for the whole of Greater London and distributed by the London Plan to individual boroughs on the basis of their capacity - see the government's planning practice guidance reference ID: 2a-013-20241212 (issued at the same time as the NPPF in December 2024). In Camden, there simply are not deliverable or developable sites available to meet the housing target that would arise from applying the standard method within the borough boundary. The Local Plan seeks to maximise housing supply in Camden using a capacity-based housing target based on the limited land available in Camden and 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). Accordingly, the Local Plan aims to deliver a minimum of 11,550 additional homes over the plan period to 2041. This incorporates 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), with a target of 703 additional homes per year from 2029/20 to 2040/41, and includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period).
I am writing to provide our response to Camden's Local Plan submission consultation. We appreciate the opportunity to contribute to the development of the Local Plan and would like to highlight the following key points: • The Local Area Energy Plan (LAEP) phase 1 outputs for the Central, Inner East and North London (CIENL) subregion, which includes Camden, shaped the UK Power Networks' 2025 Distribution Future Energy Scenarios (DFES). Data sources for the CIENL LAEP phase 1 included site allocations from the London Borough of Camden Local Plan. • The 2025 DFES predictions were subsequently used to identify future capacity via our 2025 Distribution Network Options Assessment (DNOA). • In our DNOA process, we identify future capacity needs based on the latest predictions from our DFES. We then source all the viable options to resolve our system needs, compare them and make a recommendation for the optimal solution. • The 2025 DNOA identified assets within the London Borough of Camden that require intervention ahead of what was expected prior to the CIENL LAEP phase 1 outputs. • Assessment is annual and we will continue to consider data shared by London Borough of Camden. • We are aware that London Borough of Camden are undertaking a LAEP phase 2. We will continue our collaboration with them as they advance their LAEP phase 2 to inform our forecasts. • Through UK Power Networks DFES, we also consider housing projections. This year, in collaboration with local authorities we are evolving, through our LAEP support framework, additional approaches to bring in housing data through the local authorities themselves. This includes Camden. We look forward to supporting London Borough of Camden and our continuous engagement.	Comments noted. We will continue to work with UK Power Networks on the Local Area Energy Plan Phase 2.

Chapter 1 - Introduction

Number of representations: approx. 8

Representations received from:

- British Land
- Kentish Town Neighbourhood Forum
- London Property Alliance
- Highgate Society

Main Issues	Councils Response
The draft Local Plan seeks to deliver on Camden's ambitions in "We Make Camden" and sets out strategic objectives and vision for development in the Borough which we continue to support. It is noted that no sites in the Euston Area are allocated in this plan as they will be identified through the update to the Euston Area Plan. We welcome the opportunity to provide further comments on this plan when the Regulation 19 version is published later in the year.	Comment noted.
Like that the Local Plan is driven by the missions in We Make Camden and the six ambitions. We also like the use of the Good Life Camden Framework tool. The council's aim to maximise the opportunities that exist for providing new and affordable homes, and 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 is a laudable ambition. But KTNF notes that it will not be easy to achieve the ambitions in the plan and to overcome the challenges identified in the draft against the background of the current economic climate.	Support welcomed.
KTNF is pleased to note that the draft Plan supports several priorities in the Kentish Town Neighbourhood Plan.	Support welcomed.
A clearer explanation how the plan will adapt to radical changes in planning policy we think is necessary. For example, there is a section on Duty to Cooperate, which has changed after the production of this document.	Comment noted. It is not possible for the Local Plan take account of future changes in planning policy, the final nature and detail of which is not yet know.
It would also be useful to avoid contradictions in the draft Local Plan. For example, locations where tall buildings may be an appropriate form of development are identified. Yet, the construction of tall buildings inevitably involves massive quantities of concrete and steel, whose production is a proven major contributor of greenhouse gases.	Comment noted. Policy D2 on tall buildings states that we will give particular attention to whether the development delivers the highest standards of sustainable design and construction in line with Policy D1 Achieving Design Excellence.
This includes the mission: "By 2030, Camden's estates and their neighbourhoods are healthy, sustainable and unlock creativity." Whilst the draft document goes on to explain approaches to the attainment of healthy and sustainable neighbourhoods, the idea of "creativity" needs more development.	Comments noted.
There seems to be very little evidence of how this has influenced aspects of the plan. The practical implications on the plan content of the engagement with other neighbouring boroughs need further consideration and to be detailed within the plan.	The Council has prepared a Duty-to-Co-operate statement which provides information on engagement with other boroughs. This is available to view on the Council's website.
The draft Local Plan seeks to deliver on Camden's corporate ambitions as set out in 'We Make Camden' and provides strategic objectives and a vision for development in the borough, which we support.	Support welcomed.

Challenges we face

No responses received

Vision and objectives

No responses received

Chapter 2 – Development Strategy

Number of representations: approx. 30

Representations received from:

- Highgate Conservation Area Advisory Committee
- London Property Alliance
- Kentish Town Neighbourhood Forum
- British Land
- Highgate Neighbourhood Forum
- St George West London
- LB Barnet
- Climate Emergency Camden
- General Projects Ltd
- Kings Cross Central Ltd Partnership
- Camden YIMBY
- Resident

Main Issues	Councils Response
Objects to the overarching development strategy in providing more homes.	The Plan seeks to deliver more homes to meet Camden's housing need, in line with national and London wide policy.
We are concerned in terms of suitability and deliverability that the largest proportion of new homes would be provided in tall buildings.	Comment noted.
Chapter 2: Development Strategy We agree that there should be strong support for delivering new development within the Central Activities Zone.	Support welcomed.
The overall spatial strategy for Camden should highlight the Knowledge Quarter, reinforcing the crucial role of the Knowledge Quarter in delivering world-class science and technology-driven innovation and inclusive economic growth. This importance should be emphasised in a stand-alone Knowledge Quarter policy within the draft Plan.	The Knowledge Quarter is recognised in Policy S1 for the South Area and supporting text. Part k of Policy S1 specifically relates to the Knowledge Quarter. An additional stand-alone policy is not considered necessary. Figure 03 key diagram reflects Local Plan area designations. The Plan does not contain an area designation for the Knowledge Quarter or define a specific boundary.
It is welcomed that the Euston area is recognised as a key area of growth (para. 2.17).	Support welcomed.
Concerned that the current percentage of the target from the Housing delivery test (2023) is running at 53%. The plan should include measures to address shortfalls in future, to avoid being directed by the Secretary of State.	The Plan includes a number of policies and site allocations to maximise housing supply in Camden, reflecting the capacity for development over the Plan period.
2.13. Jobs: KTNF notes that commercial to residential applications are running at 62% and that nearly a third of commercial space applications result in successful appeals.	Comment noted.
KTNF likes the clarity of approach in paragraph 2.16.	Support welcomed.
2.20 KTNF supports the policy of an area-based approach to support and guide the delivery of new development in the borough, and the focus on the sub-areas of South Camden, Central Camden, West Camden, and North Camden.	Support welcomed.
2.30 KTNF welcomes the fact that the Council wants developers to consider the effects of the development on deaf, disabled, neurodiverse, gender diverse, the elderly, women, and children.	Support welcomed.
2.31 KTNF welcomes the guidance to developers to consider their plans with regards to other sections including sustainability, housing, access, communities, transport and the natural environment.	Support welcomed.
2.32 KTNF thinks the promotion of mixed-use developments is a sensible policy given the limited space available.	Support welcomed.
2.33 KTNF welcomes the stress on Place Making and the fact that 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.	Support welcomed.
2.34 KTNF welcomes the fact that on adjoining sites and those with multiple ownership the council expects 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.	Support welcomed.

Main Issues	Councils Response
2.36 KTNF applauds the use of the citizen science pilot which will deliver community-based, practice-led research training in social science methodologies at UCL Citizen Science Academy for Camden residents.	Support welcomed.
General point: KTNF, notes the chapter mentions incorporating measures to reduce flood risk but requests that the council includes more information on avoiding impermeable surfaces in the Development Strategy to allow rainwater and surface water to drain and reduce flooding.	Comment noted. The Council's approach to managing flood risk is set out in Policies CC10 Flood risk and CC11 Sustainable drainage of the Plan.
Our neighbourhood, Highgate is under the governance of both Camden and Haringey. The maps in this plan, show only that part of Highgate which is under Camden, and thereby considerably reduces its significance as a neighbourhood. It is our impression that we are marginalised by both and never considered holistically. We should like the plan to specifically promote working with neighbouring boroughs and, in the case of Highgate, promote working closely with Haringey.	The Camden Local Plan is only able to show planning designations within the Camden borough boundary. The Council engages with Haringey Council on a regular and on-going basis to identify any strategic cross-boundary planning matters. Para. 1.28 notes that: "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". Cross-border working between the Councils also occurs in relation to other activities such as transport projects.
Summary of response: Regarding new development, we are concerned by: - the prioritisation of 'growth' for its own sake - its lack of a strategy based on evidence - failure to consider the long-term consequences of climate breakdown - lack of hard targets for restraining harmful outcomes and operating within planetary boundaries for sustainable development.	Comment noted.
Unless the Plan is modified to resolve the issues raised, the Inspector will be forced to conclude that it is unsound and incapable of adoption. In its present form the draft Camden Local Plan: • fails multiple NPPF requirements on housing need, affordable-housing thresholds, density optimisation and decision timeliness; • lacks proportionate evidence to justify deviations; and • has not demonstrated effective cross-boundary cooperation.	The Local Plan is considered to be sound and supported by appropriate, proportionate evidence. The Council has met statutory Duty-to-Cooperate requirements as set out in its Duty to Co-operate Statement. See also responses above.
Introduction to Representation (executive summary) noting: 1 Camden is in a housing crisis. 2 The Draft Local Plan (Reg 19) is not consistent with Government objectives prioritising brownfield development, ensuring realistic targets, with presumption in favour of housing to deliver 1.5 million homes. 3 A strategic objective of the CLPRPSD is to increase housing supply, however as drafted it slashes housing targets. Over the past four years, only a third of Camden's housing target has been achieved (1,498 out of 4,152 homes) and only 20% of its affordable housing target (289 out of 1,412 homes).	Comments noted. As this is just a summary of the comments made, a full response is provided to the more detailed comments set out below.
Continued introduction to Representation (executive summary) noting: 4 Camden is required to deliver 3137 homes per year, however the plan reduces the target to 770 homes per year. 5 Housing delivery will be hampered by the unrealistic and onerous strategic objective that 50% of all homes should be affordable, ignoring the finding of the viability assessment. 6 The housing policies remain substantially as per the 2017 Local Plan and no steps have been taken to streamline planning policy to accelerate housing delivery. A new approach with a presumption in favour of housing is required.	Comments noted. As this is just a summary of the comments made, a full response is provided to the more detailed comments set out below.
Continued introduction to Representation (executive summary) noting: 7 Site specific allocations are overly prescriptive and constrain delivery, e.g.) C7 Camden Goods Yard. 8 The draft Local Plan is unsound and has not been positively prepared. A fundamental review of its housing targets and policies is required.	Comments noted. As this is just a summary of the comments made, a full response is provided to the more detailed comments set out below.

Main Issues	Councils Response
Noting the targets set out in the NPPF (88,000 homes per year for London), and that delivery in London has plummeted with expectation of more decline. • The housing crisis has become an emergency. • London's borough spend £4 million per day on temporary accommodation. • 1 in 21 children is in temporary accommodation. • Local Authority finances are being severely eroded by managing housing crisis. • Housing delivery rates have been falling since 2021. Housing delivery rates have been falling since 2021. • Decline of starts/ completions • Decline of planning applications submitted. The next Camden Plan should focus on the challenges facing housing delivery, and all policies are prepared with delivering for Camden as their central focus.	Comments noted. The review of the London Plan will set out how London will deliver its new housing target of 88,000 new homes per year. As part of this, the housing targets for each local authority will be reviewed, including Camden's.
We agree that there should be strong support for delivering new development within the Central Activities Zone (CAZ), growth areas, town centres and other major development locations within Camden.	Support welcomed.
Suggest that a further paragraph is added below Figure 3 – Key diagram to state: “Whilst the key diagram identifies the areas of main focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to meeting the necessary policy requirements of this Local Plan.”	The Plan identifies key areas of development in the borough but this does not preclude development coming forward elsewhere. No additional wording is considered necessary.
The critical role the Knowledge Quarter plays in delivering inclusive growth for the borough and London should therefore be emphasised in the draft Plan.	Policy S1 South Camden recognises that 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. The role of the Knowledge Quarter is also recognised in chapter 9 Delivering an Inclusive Economy. No additional wording is therefore considered necessary.
Support for the overall spatial strategy (in terms of new homes and jobs) set out in the Local Plan. Welcome the statement in the Local Plan that Camden's housing target may only be in place for a short period of time due to the review of the London Plan.	Support welcomed.
Seek confirmation on whether the cumulative impacts of Camden’s proposed site allocations and Barnet’s site allocations (particularly those close to the shared administrative boundary) have been collectively considered to establish whether the additional traffic flows modelled would cause undue concern at this stage, to Barnet’s highway and existing transport Infrastructure, and whether appropriate mitigation measures and funding has been thorough considered and/or secured.	In line with the Council's Transport Strategy, the Local Plan seeks to 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. Given this, the site allocations in the Local Plan should not give rise to significant levels of additional traffic that would impact on existing transport infrastructure. Any impact will be assessed at the planning application stage, through the submission of a Transport Assessment.
The Key Area of Development identifier shown in Figures 03 and 06 of the Draft Plan should be extended to incorporate the St Pancras Way site allocations, in line with the Spatial Strategy and Draft Policy S1. This would also align with Canal Side to Camley Street Supplementary Planning Document (SPD) (2021) area.	Figures 3 and 6 are indicative and included in the Plan for illustrative purposes only. Further details of the Council's spatial strategy are set out in para's 2.16 - 2.18 of the Plan and in the chapters on South Camden, Central Camden, West Camden and North Camden, which also include maps showing the more precise locations of the proposed site allocations. It is considered that the positioning of the key areas of development on Figures 3 and 6 align with locations set out para's 2.16 - 2.18 of the Plan. No change is therefore considered necessary.
The approach to combine site allocations and a series of locational growth strategies and development priorities in the Plan are generally supported. The strategic objectives of draft policy DS1 is fully supported. Many of the area specific requirements could be consolidated into a single borough wide policy as many parts of draft policies S1, C1, W1 and N1 are overly repetitive.	Support welcomed.

Policy DS1 – Delivering Healthy and Sustainable Development

Number of representations: approx. 18

Representations received from:

- Highgate Society
- London Property Alliance
- Kentish Town Neighbourhood Forum
- British Land
- NHS HUDU
- St George West London
- Hilson Moran
- Land Sec
- Primrose Hill Conservation Area Advisory Committee
- Woodland Trust
- Belsize Conservation Area Advisory Committee
- Belsize Society

Main Issues	Councils Response
Welcome changes made to the supporting text in para 2.25 to respond to the comments made by HUDU on the draft Local Plan (Regulation 18 stage).	Support welcomed.
Policy DS1 A1 is welcomed - the recognition of the importance of respecting and responding to local context, of preserving 'what is distinctive and valued about the local area' at 2.27, and the broad understanding of 'character' at 2.28.	Support welcomed.
We welcome the principle of a comprehensive approach to site design and layout, however given sites or areas are often in multiple land ownerships, bringing forward coherent and integrated developments, through the preparation of a joint masterplan, will be challenging in many instances and restrict development opportunities. It is suggested this reference is removed.	It is considered appropriate for policy DS1 to seek a comprehensive approach to redevelopment.
Policy DS1 Some guidance on how priorities will be decided where there are potential conflicting demands would be useful.	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. The weight attributed to different policies, criteria and other material considerations is a matter for the decision taker as part of the planning application process.
DS1 B KTNF welcomes the fact the Council is seeking contributions from major developments towards the Council's Citizen Scientist community research programme to monitor the impacts of development.	Support welcomed.
Same as before - previous comments were not addressed 1 - No mention to creating social value at both construction and operational stage of development. This is recommended to be included. 2 - The policy is fairly standard, except for major development, as they have to contribute to the council's citizen scientist community research programme.	The term social value does not have a standard meaning in terms of planning. However, although the term is not used, 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 emergency, create stronger communities and deliver healthy places, both for existing communities and future generations. Other policies seek to secure specific measures that would add social value. No additional wording is considered necessary.
Policy DS1 The prioritisation of re-use over redevelopment should be included.	The approach to the retention of existing buildings is set out in Policy CC2 - Prioritising the retention of existing buildings.
Policy DS1 A2 Risk that net zero would conflict with other principles of good design, conservation, protection of historic environment.	Comment noted
B. Citizen Scientists do not appear to meet the S106 rules for contributions to "reasonably relate" to the development in question.	The Citizens Scientist programme has been designed to empower communities to lead change through social action and shape policies that impact their lives. 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. It is considered that the requirement meets the tests required for Section 106 obligations.

Main Issues	Councils Response
Include a section on “Community Organisations” here as the section on Citizen Scientists suggests other routes to local resident engagement should also be included. The local plan should highlight the potential benefits of early involvement and consultation with residents through these “grassroots” organisations.	The Council's Statement of Community Involvement sets out how the council will engage with community groups as part of the planning process. No additional wording is therefore considered necessary.
We welcome the wording in A9 on maximising opportunities for enhancing biodiversity, improving access to nature, tree provision, urban hedgerows and community food growing.	Support welcomed
Welcome new bullet point has been added to Policy DS1 identifying that the Council will expect development to meet the needs for new homes and jobs. Emphasis should be added to highlight that housing is the priority land use. Suggested wording: “Meeting the needs for new homes, <u>the priority land use across the borough</u> , and jobs.	The Local Plan is clear that the Council regards permanent self contained housing to be the priority land-use of the Local Plan (see Policy H1). It is not considered necessary to amend criterion A.4. of DS1.
Landsec support the inclusion of the comprehensive and co-ordinated development section through the introduction of paragraphs 2.33-2.35 of the draft Local Plan, specifically the statement that “piecemeal and uncoordinated development, where sites are taken forward in a fragmented or disjointed way, without a comprehensive plan, will be resisted.” Only a comprehensive approach can deliver the full range of potential public benefits associated with the regeneration of the area. The same level of placemaking, new homes, open space, community benefits and infrastructure funding would not be achieved by a series of piecemeal developments.	Support welcomed.
The reference in Policy DS1 and para 2.37 to financial contributions to the Citizen Scientist programme should be removed.	The Citizens Scientist programme has been designed to empower communities to lead change through social action and shape policies that impact their lives. 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. It is considered that the requirement meets the tests required for Section 106 (S106) obligations.
Agree with the main principles of Policy DS1 which states that developments will be expected to optimise the use of land and make the best use of a site through mixed use development. However, mixed use development comprising residential and commercial floorspace is often not using land efficiently or making the best use of a site as it can lead to both uses being compromised, reducing the ability to optimise sites and deliver on local, regional and national objectives.	Comment noted.
Citizen Scientist contributions: There is a concern that additional financial contributions would place further burden on developments that are already struggling with viability. Question whether this could reasonably meet the tests for s106 obligations as being necessary to mitigate the impact of development. Consider this unjustified and should be removed.	The Citizens Scientist programme has been designed to empower communities to lead change through social action and shape policies that impact their lives. 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. It is considered that the requirement meets the tests required for Section 106 (S106) obligations.
Support this policy but DS1 (A1) must be adhered to: currently it is frequently not and new buildings are often consented that are out of scale, not “of the highest design quality” and do not “respect and respond to local context”. We are surprised and disappointed the highly significant new 100 Avenue Road development at Swiss Cottage (W12), on the border of area C/W, has not been given any detailed consideration in this plan. This hugely damaging	Comments noted. Site allocation W12 -100 Avenue Road reflects the fact that the site has planning permission and works have commenced. Any subsequent application will be assessed against the allocation and all relevant Plan policies, including those on design (D1) and open space (SC4).

Main Issues	Councils Response
scheme will destroy an important and heavily used pedestrian piazza and we feel consideration of this is a major omission. The fact that this 'place' has not been recognised more emphatically in this Local Plan is a deficit. We look forward to seeing Policy DS1 (A8) acted on to provide "new open space".	

Chapter 3 – South Camden

Number of representations: approx. 2

Representations received from:

- British Land
- Highgate Conservation Area Advisory Committee

Main Issues	Councils Response
Much of South Camden is located within the Central Activities Zone where the focus should be on growing and supporting the economic productivity of London.	Comment noted.

Policy S1 – South Camden

Number of representations: approx. 29

Representations received from:

- London Property Alliance
- British Land
- Transport for London
- British Museum
- NHS HUDU
- Shaftesbury Capital
- Dominus
- General Projects
- UCL
- Tarmac Trading Ltd
- University of London
- The Fitzrovia Partnership
- GLA
- The Magic Circle

Main Issues	Councils Response
The Local Plan should look to define the boundary of the CAZ in detail and include on the policies map in line with Policy SD4 of the London Plan. New residential development should not compromise the strategic functions of the CAZ in accordance with the London Plan.	The draft Policies Map shows the boundary of the CAZ in Camden. It is considered that the approach taken in the Local Plan aligns with Policy SD4 of the London Plan.
Support Camden Council in protecting retail clusters. Designation of Charlotte Street is welcomed. Encourage the definition of the SSA including Mortimer Street, Charlotte Place, Rathbone Place, Windmill Street, Percy Street and Goodge Place. This will create a distinctive, coherent and connected food and beverage cluster. Need a High Street Action Plan Welcome efforts to widen range of activities available in the evening and investment in infrastructure to ensure everyone feels safe and welcome	Support welcomed. The preparation of the draft Local Plan included a review of a number of centre boundaries taking into account the findings of the 2024 Camden Retail Needs Assessment and changes in land uses. We consider that the core part of the food and drink offer in the area is Charlotte Street, although food and drink uses have become more prominent in adjoining streets. Although the amended designated area is called the Charlotte Street Specialist Area, it incorporates parts of a number of other streets including Tottenham Street, Charlotte Place, Windmill Street, Percy Mews and Percy Street. We consider the boundary is coherent and appropriate, reflecting current uses in the area. The preparation of a High Street Action Plan is not a matter for the Local Plan.
Ensure that S106 and CIL monies from site allocations are invested in an accelerated fashion in the Fitzrovia area, specifically key public realm, cycling and walking and greening projects including Warren Street, Charlotte Street and Chitty Street.	Comment noted. The spending of S106 and Community Infrastructure Levy funds and its timing is not a matter for the Local Plan.

Main Issues	Councils Response
Welcome Camden's approach to sustainability, in particular achieving net zero carbon. Ask that Fitzrovia is given a new designation in the Local Plan, which is as Camden's first 'Fast Zero' Community.	Support welcome. The Local Plan has a suite of climate change policies to help accelerate the transition to net zero throughout the borough. We do not consider it necessary, reasonable or appropriate to take a specific approach to one part of the borough.
General support for Policy S1, which outlines support for the Bloomsbury Campus Area.	Support welcomed. Comment noted.
There are two concrete plants located at Kings Cross. Therefore S1.Q should read: " the Council will continue to protect the concrete plants at King's Cross..." to ensure that it is clear that both concrete plants are protected within the Aggregate Safeguarding Area.	We will propose a modification to address this point.
Educational Use • Support for the importance given to educational uses in the defined areas noted for draft Policy S1 (South Camden) and Policy S4 (Bloomsbury Campus Area). • Support for Camden's promotion of the Knowledge Quarter, and the provision of research, learning and knowledge-based uses under draft Policies S1 and S2 (Euston Area).	Support welcomed
Should recognise the importance of visitor economy in this sub-area.	Part S recognises the role of the CAZ in meeting the needs of visitors.
The commitment to the delivery of infrastructure in part U is strongly supported.	Support welcomed.
Policy S1 should recognise that unallocated sites have significant potential to deliver growth and should set a growth target for employment and economy in terms of office floorspace. It should recognise the role that offices can have in relation to the Knowledge Quarter, requires more than just lab space to thrive. The policy should also recognise the importance of the visitor economy in this sub-area. The commitment to the delivery of infrastructure in part U is strongly supported.	Policy S1 sets out the Council's overarching development strategy for the South of the borough and should be read in conjunction with the other policies in the Plan. The Plan states that the Council proposes to meet needs from existing permissions, site allocations and 'windfall' schemes, which are not allocated (para 2.11). The Council's Economic Needs Assessment 2023 forecasts a demand for an estimated 406,359 sqm of net additional office floorspace to 2041 across the whole borough. It is not considered necessary to set out a specific figure for the South Camden area. S1 Part J recognises that the CAZ and Knowledge Quarter will continue to be the main focuses of employment development in Camden. Employment development includes office provision. Therefore, no change to the policy is considered necessary.
Support the provision of Policy S1 for '...maximising community benefit at the planning, construction and end-user phases, including supporting increased access to jobs, skills training and educational opportunities.'	Support welcome.
Support policy as draft subject to Seven Dials being designated as a CAZ Retail Cluster. "Specialist Area" does not fairly nor appropriately demonstrate the mix of uses and contribution Seven Dials makes to the West End and night time economy. Part T of Policy S1 recognises the key focus of evening and night-time economy uses within the south of the Borough, however the policy goes on to state that the Council will support a range of evening and night-time economy uses in the CAZ retail clusters, with no mention of the support for these uses within Specialist Areas If Seven Dials is 'pigeonholed' as a specialist shopping area, this could be harmful to the ability for high streets to diversify and adapt over time in terms of land use, impacting the character and vitality of the centre.	The designation of Seven Dials as a 'Specialist Area' is long-standing and this has not been a barrier to the provision of evening and night time uses, as the LB Camden Retail Needs Assessment shows. We do not, however, consider there is the same ability to accommodate additional evening and night time uses in Seven Dials relative to other CAZ Retail Clusters due to the mixed commercial and residential character of the Seven Dials area. Being a Specialist Area does not mean that no night time uses are appropriate and it is noted that there are already a rich mix of uses, including cultural and leisure attractions, which are part of the area's role and function.
As the needs of the NHS will change over time, ongoing consultation with the ICB will be required to ensure that the delivery of an Integrated Care Hub is the most efficient way to deliver its priorities.	Comment noted.
The BM considers that its own contribution to the cultural offer, tourist and visitor economy, and local employment provision in South Camden is also significant and should be clearly acknowledged and supported in this policy in the same way.	The Plan recognises the importance of the British Museum in paragraph 3.3.

Main Issues	Councils Response
The BM is supportive of this emphasis on sustainable transport and public realm initiatives in the Plan, but reiterates the requirement that proposals for the pedestrianisation of GRS and Montague Place must maintain vehicular access for the BM to support its daily operations, as well as ensure access for emergency services.	This is not a matter for the Local Plan. No additional wording is therefore considered necessary.
The Council should make the safeguarding Limits, including sites of surface interest, clear within the relevant area policies of the draft Plan. We note that the safeguarding directions are now clearly stated in the relevant site allocations, except where stated below.	Policy T1 Safe, Healthy and Sustainable Transport states that the Council will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure projects. Local Plan Transport Safeguarding Areas, HS2 Phase 1 Safeguarding and HS2 Homeowner Protection Zones are then designated on the Policies Map. Given this we do not consider that it is necessary to also add reference to this into the area policies, particularly as it will only really be applicable in the south of the borough.
Developments above running tunnels should carefully consider foundation design to ensure that there is a pile free corridor that will allow us to build Crossrail 2 tunnels in the future. Development designs should ensure that the building will not be compromised by the future tunnels and that any future occupiers will not experience noise and vibration from the future operation of Crossrail 2. In these circumstances, development can usually proceed but the developer will need to discharge our recommended Crossrail 2 conditions (if recommended) that ensure the foundation design meets these criteria.	Comments noted. This is a consideration for the planning application process, rather than a matter for the Local Plan.
We would recommend Crossrail 2 safeguarding to be referenced in this policy.	We consider that the Plan clearly sets out the Council's approach to this in Policy T1 Safe, Healthy and Sustainable Transport and relevant site allocation policies. The suggested amendment is not considered necessary.
Policy S1, Part U 1 should be amended to read 'The delivery of a new High Speed 2 station and mainline station improvements at Euston, <u>alongside improvements to other supporting public transport and active travel infrastructure serving the station.</u> '	Agree that the suggested text would add clarity.
Policy S1, Part U 2 should be amended to read "The transformation of Euston Road <u>in accordance with Euston Healthy Streets</u> and the removal of the King's Cross gyratory."	Agree that the suggested text would add clarity.
Part 9 - We welcome the amendments made to the policy to reflect the potential need to reinstate four tracks and a third platform on the North London Line to meet future passenger and freight demand.	Support welcome
The policy also has the opportunity to set out proposals more generally to improve bus infrastructure and journey times.	We consider that the Plan clearly sets out the Council's approach to this in Policy T3 Public Transport and relevant site allocation policies. The suggested amendment is not considered necessary.
Continue to support part (G) of Policy S1 – South Camden where financial contributions towards housing could be used on Camden's housing estates to enable the delivery of developments through the Council's Community CIP Programme.	Support welcomed.
We support Parts J and K of the policy which acknowledges that the Central Activities Zone and Knowledge Quarter will continue to be the main focus of employment development in Camden. Requiring housing both on and off site in these locations is challenging in terms of viability, site availability and the potential conflict between land uses and may undermine the area's economic growth, productivity and future competitiveness, contrary to London Plan objectives.	Support welcomed. Comment noted.
The Local Plan should be consistent with the London Plan where there is an emphasis on ensuring that CAZ is focused on economic development. Policy S1 (Part A) should be reworded to say: "The Council will ensure development in the south of the borough contributes to the area's continued economic success..." Moreover, employment and the economy should be ordered first and reference compliance with the London Plan.	The area defined in the Plan as 'South Camden' applies to a broader area than the Central Activities Zone. The area encompasses a number of neighbourhoods, at the heart of which are strong and diverse residential communities. These along with wide mix of uses in this area, contribute to its success. S1 Part J states that 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. No change to wording is therefore considered necessary.

Main Issues	Councils Response
Support Policy S1 (Part G) where financial contributions towards housing could be used on Camden's housing estates to enable the delivery of developments through the Council's Community CIP Programme.	Support welcomed.
Support Policy S1 (Part J) which acknowledges that the CAZ and Knowledge Quarter will continue to be the main focus of employment development in Camden. We also support Part K, which seeks to support the Knowledge Quarter to thrive as a hub of innovation and knowledge-intensive industries in line with the KQ2050 Strategy. However, requiring housing on site in these locations is challenging both in terms of viability and the potential conflict between land uses and may prejudice the area's economic productivity and future growth, contrary to London Plan objectives and the KQ2050 Strategy.	Comment noted. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. The draft Local Plan has also been subject to viability assessment which can be found on the Council's website. In addition, Policy H2 (maximising the supply of housing from mixed use schemes) allows for the consideration of the economics and financial viability of the development.

Policy S2 – Euston Area

Number of representations: approx. 11

Representations received from:

- GLA
- The Magic Circle
- Network Rail
- University College London
- LB Barnet
- Transport for London
- British Land
- Lendlease and the Euston Landowners

Main Issues	Councils Response
Support the new policy	Support welcome.
Suggest that the ambitions of "We Make Camden" are included in this policy to retain consistency across the borough, particularly in relation to para. 3.18.	The ambitions of We Make Camden are set out in paragraph 1.66 and apply to the whole borough, including Euston.
Support the Policy and share the Council's aspiration for transformational change.	Support welcomed.
• Support for developing Euston as a life science cluster / recognising it is an existing high performing growth sector across various sectors including technology, science, medical/healthcare, and education. • Recognising the importance of Euston as a hub of innovation, how HS2 will be an important driver for connectivity in and out of a key cluster in London and how higher education uses will continue to provide a strong positive economic impact in the area.	Support welcomed
• Due to the extensive synergies between research, learning and knowledge-based uses, and educational uses, it is imperative that educational uses are also included within draft Policy S2 to support the delivery of such uses in the Euston Area, and to be consistent with other relevant planning policies such as the Euston Area Plan which supports the provision of education and community facilities in this area. • To accommodate this change, suggested amendment to draft Policy S2: "[...] 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 and educational floorspace for research, learning and knowledge-based uses; [...]"	Comments noted. Modification proposed
Table 2.1 of LP2021 sets out an indicative capacity for 2,800-3,800 homes in Euston OA along with 8,600-15,000 jobs. As set out in paragraph 2.1.1 of the LP2021, these figures should be used as a starting point to be tested through the assessment process. The draft Plan identifies that Euston is expected to deliver between 1,500 and 2,500 new homes. Noting that the indicative capacity is below that identified within Table 2.1, clarity on the capacity assumptions made for the Euston area by LBC would be welcomed.	The housing capacity figure for the Euston Area included in the Local Plan (Policy S2) reflects the proposals in the draft Euston Area Plan 2023. This sets out that the revised housing projection for Euston is based on the outcomes from a design-led capacity study which took into account additional site constraints, less enabled land, higher costs, and viability issues. The draft EAP was published for consultation in early 2023 and the Mayor of London responded to that consultation. This response states at para 3.5 "As LBC have

Main Issues	Councils Response
	endeavoured to establish the capacity for growth in the Euston OA, taking account of the indicative capacity for homes and jobs in Table 2.1, there are no conformity issues with LP2021 Policy SD1”.
Suggest that the underlined wording is introduced to Policy S2. “To realise the vision and objectives set out in the Euston Area Plan, the Council will: <u>1. Support the optimisation of development at Euston, recognising that there are tangible viability challenges associated with the delivery of nationally significant transport infrastructure and associated development projects”.</u>	Policy S2 sets out the Council's overarching approach to the delivery of development in the Euston Area, with further detail provided in the Euston Area Plan, which is also currently being reviewed. The Council recognises the challenges of delivering development at Euston and is working with its partners to help mitigate these. We will propose a modification to address this.
Concerned with the fixed housing limits included in the policy. The capacity of the site should be tested through a planning application process. The pressure to deliver housing should not compromise the delivery of employment floorspace. Ask that the policy wording is amended as follows: <u>“2. expect the development at Euston to be optimised, with the capacity for housing tested through discussions with the Council during the planning application process and balanced with the delivery of employment floorspace; deliver between 1,500 and 2,500 additional homes in total, along with the provision of appropriate replacement homes.”</u>	The housing capacity figure for Euston set out in Policy S2 is aligned with the figure in the emerging updated Euston Area Plan. We will propose a modification to provide further text on housing capacity.
LB Barnet would welcome being consulted on any future proposals for Euston, including strategic planning applications within the Euston Plan area, so as best to understand any impacts the proposals will have on LB Barnet, namely any “knock on” and cumulative impacts developments may have on Barnet’s highways and public transport infrastructure.	Comment noted. The Council will continue to engage with LB Barnet on matters relating to Euston in accordance with the Duty to Co-operate.
The policy proposals S1 and S2 as set out in the Camden Local Plan Submission draft give a 'once in a generation' opportunity to restore this area of Euston which has been so badly affected and neglected over the last ten years and for the Stephenson Way/Euston Street business community to be fully restored in order for it to play a significant role in the regeneration of the Euston Opportunity Area and South Camden more generally.	Comments noted
The achievement of the Council's aims and objectives under its new Local Plan will only be possible if the Council takes action to ensure that the following principles are established and followed as part of Policies S1 and S2. 1. The restoration as early as possible of local connectivity, permeability and linkages, more especially within the Euston Opportunity Area and to the revitalised Euston Station. 2. Ensure economic, social and spatial cohesion between the existing urban fabric (as restored and refreshed) and the new development associated with the regeneration of Euston Station. 3. Come forward quickly, even while HS2 works continue, with significant local environmental improvement initiatives and antisocial avoidance and security measures. 4. An inclusive approach building upon the strengths of the existing arts and sciences cluster to the south and west of Euston Station to upgrading and revitalising this area of South Camden by having and encouraging a focused and constructive dialogue with the long established institutional incumbents, seeking to align and merge the aims and objectives with those promoting development, especially within the boundaries of the Euston Opportunity Area. 5. The Council and other authorities agree to consider a sympathetic approach which either excludes or reduces the burden of CIL requirements on the redevelopment and improvement of those properties around Euston Station which have been significantly impacted by HS2 building works over a decade or more. 6. Recognising the potential and strategic importance of the existing institutions within South Camden, and more especially around Euston Station, to foster meaningful and	Comments noted. Policy S2 sets out the overarching strategy to support development in the Euston Area. The Euston Area Plan, which is being updated, sets out further details of the Council's approach.

Main Issues	Councils Response
active participation when planning the redevelopment of Euston Station.	

Policy S3 - Hatton Garden Jewellery Industry Area

Number of representations: approx. 4

Representations received from:

- Pearl and Coutts

Main Issues	Councils Response
There have been only 3 planning applications in the last 15 years in the Hatton Garden area proposing extensions to premises that have triggered the 200sqm threshold set out under the adopted Local Plan policy E2. We consider that the adopted and replacement policy is a significant barrier to development and is resulting in a substantial lack of investment in the built environment within Hatton Garden compared to other CAZ locations. The requirement to provide half of any new floorspace at affordable levels (50% below the market rate for the jewellery trade, which itself is already a heavily reduced rate) is financially unviable for developers.	The threshold of 200sqm is based on the relative smaller size of schemes/sites that typically come forward in Hatton Garden and is considered appropriate. The longstanding equivalent policy in the current and previous Local Plans has been effective in sustaining Hatton Garden's particular role as a centre for the jewellery industry. We consider that retaining this approach is necessary to ensure that Hatton Garden's unique character is preserved and its function as a centre for the jewellery industry can be sustained. The Council's Affordable Workspace Strategy identifies that rising rents are a challenge for jewellery related businesses in finding suitable premises in the Hatton Garden area.
There has been a reduction in the need for jewellery specific floorspace in Hatton Garden and the requirement is predicted to fall further (source - ENA) while there is significant demand for office floorspace forecast. Policy S3, as drafted, prevents substantial new office floorspace being created in the Hatton Garden area as the policy threshold to provide half of any new floorspace over 200 sq/m as discounted floorspace for the jewellery trade makes it financially unviable.	We consider that retaining the policy approach is necessary to ensure that Hatton Garden's unique character is preserved and its function as a centre for the jewellery industry can be sustained. The projections in LB Camden's Economic Needs Assessment reflect the fact that there are a range of factors impacting on the operation of jewellery businesses, including having access to sufficient affordable space and competition for premises from other higher value uses. We do not consider it would be beneficial to raise the threshold in the policy as this would reduce the total number of schemes coming forward that would be able to provide additional jewellery workspace. The policy is clear that this is the priority land use in Hatton Garden, not general office space.
The introduction of Class E allows a planning unit to be changed between uses without planning permission. Part A of the policy should only seek to protect premises which have been explicitly secured as jewellery workspace by planning condition.	Only schemes which require planning permission will be assessed against Local Plan policies and therefore no change is considered necessary. The introduction of Use Class E is likely over time to lead to further reductions in jewellery workshop space. We consider that retaining the policy approach is necessary to ensure that Hatton Garden's unique character is preserved and its function as a centre for the jewellery industry can be sustained.
200sqm threshold is overly restrictive and should be reviewed. Suggest 500sqm The requirement to provide 50% of additional floorspace at a 50% discount to the rental levels for the jewellery trade is also challenging due to the discounted rental levels already offered to the jewellery trade (in many cases a 50% reduction to the general market rent). This, in effect, means that the policy makes the true discount offered to the jewellery trade to be closer to 75% compared to the market rate. Amend to "affordable premises for jewellery-related uses" which would operate on a scheme-by-scheme basis. The % of jewellery workspace being sought should be reduced to 25% Any proposals caught by the policy should be subject to viability.	We do not propose to change the thresholds as doing so would make it harder for jewellery businesses in Hatton Garden to secure space suitable for their needs. The Council's Affordable Workspace Strategy identifies that rising rental levels are a challenge for businesses in securing accommodation they can afford. The current and emerging policies for the Hatton Garden area already take viability into account, para. 3.26 of the draft plan states "we will seek to negotiate the greatest discount to market rents that is viable". The longstanding equivalent policy in the current and previous Local Plans has been effective in sustaining Hatton Garden's particular role as a centre for the jewellery industry. We consider that retaining the policy approach is necessary to ensure that Hatton Garden's unique character is preserved and its function as a centre for the jewellery industry can be sustained.

Policy S4 - Bloomsbury Campus Area

Number of representations: approx. 4

Representations received from:

- University of London
- UCL

Main Issues	Councils Response
There is not a requirement to increase academic space within the Bloomsbury Campus Area (due to post-Covid working arrangements), however there is a need to: • Improve existing facilities; and/or, • Provide academic [office] and supporting office space. Policy S4 should be amended to expressly support conversion of existing facilities and creation of new high-quality space required.	Comments noted. The Plan covers the period to 2041. Given this it is considered that the wording of the policy is appropriate as circumstance may change over that period. Furthermore, should the university wish to increase academic floorspace at some point in the future, we consider the Bloomsbury Campus Area to be the most appropriate location for this to happen. In recognition of the universities ambitions to improve academic facilities though, we propose a minor modification to reflect this.
• Continued support the principle of draft Policy S4 (Bloomsbury Campus Area) and the promotion and support for educational uses in this location. • However, there are certain key points that require further consideration within the draft Policy. • Consideration should be given to: - Those buildings which may not be the most efficient for educational use, and - Whether they would be more suited to an alternative land use, for example residential. • The current draft policy seemingly restricts the Council from being able to consider alternative land uses which could achieve other unmet needs, such as residential. • a level of flexibility is afforded to such situations in the borough to promote the best use of existing buildings. • Temporary flexibility for conversion of buildings to educational use would help support Higher Education Institutions. • Such an approach is justified, and necessary to be consistent with the London Plan which supports the development of educational facilities where there is unmet need. • It is requested that an additional section, part C, is added to draft Policy S4: “[...] C. The Council will work proactively with Higher Education institutions and support the development of their estate strategies, recognising the need for some flexibility as institutions continue to develop their campuses to meet increased demand and/or changing needs. Where it has been demonstrated that a site is not well suited to an ongoing academic use, the Council will support the delivery of alternative uses, to support the Plan’s land use priorities. The Council will also support temporary educational uses in the Borough where demand for these is robustly evidenced and any planning impacts are mitigated.”	Any application for the conversion of educational facilities would be considered against all relevant policies in the Plan, including Policy S4 and Policy SC3. It is considered that the Plan contains sufficient flexibility and no change is therefore considered necessary.
The proposed boundary map for draft Policy S4 should be amended to include main campus buildings that fall outside, but within close proximity to the proposed boundary.	The area that Policy S4 applies to, as designated on the Policy Map, is considered to be appropriate.
Concern regarding the specific reference to/ promotion of ‘University of London [or its member institutions]’. It is unjustified, and not consistent with planning policy such as the NPPF and the London Plan which promotes educational uses across a range of prospective operators/institutions. It is suggested that this definition is amended to ‘Higher Education Institutions’ to promote inclusivity across the use.	The area covered by Policy S4 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. Given this, it is considered that the wording in the Policy is appropriate.

Site Allocation Policy S5 -120-136 Camley Street Number of respondents:

Number of representations: approx. 6

Representations received from:

- Network Rail
- Thames Water
- NTA Planning
- Transport for London

Main Issues	Councils Response
We welcome the amendments outlining the provision of a new public space that facilitates a coordinated route along the boundary with Agar Grove Estate, enhancing connectivity for pedestrians and cyclists along Carnley Street. Parts 11.a and 11.b of the policy appear to be duplicates.	Support welcome. Noted that 11b duplicates 11a.
Part 12- Welcome the addition that development will be expected to contribute towards improved access to bus services on Agar Grove.	Support welcome.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development	Comment noted and we will propose a modification.
Welcome and support the allocation. Agree that development must be taken forward in a coordinated way. The layout and design of the scheme must properly respect Agent of Change principles with respect to operational noise and light pollution, minimise conflicts with operational vehicles and explore options to safely improve connectivity through the Camley Street bridge. Support looking at options to open up the adjacent arch to create safety and public realm improvements to separate vehicles, pedestrians and cyclists, which London Plan policy D2 also supports.	Support welcome. Comment noted.
Support the aspiration of the allocations for self contained residential and employment and indicative capacities.	Support welcome
Principles should go further to promote the flexibility of employment and compatible uses with adjacent site S6. Should promote flexible and viable land uses to align with national aspirations, emerging London Plan aspirations and the aspirations of the Canal side SPD.	The allocated uses for both sites refer to a range of employment uses.

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

Number of representations: approx. 8

Representations received from:

- Heibelberg Materials
- Transport for London
- NTA Planning
- Thames Water
- Network Rail

Main Issues	Councils Response
We note the new requirement in Site Allocation S5 for development to contribute towards improved access to bus services. As per our Reg. 18 comments, this should be extended to this site allocation as well.	Comment noted. Minor modification proposed.
Part 18 - We welcome the requirement for development in this site allocation to contribute towards a new canal crossing to improve connectivity between King's Cross, Carnley Street and St. Pancras Way.	Support welcome.
Sewer Treatment Works catchment Beckton	Comment noted and we will propose a modification.

Main Issues	Councils Response
Waste network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development. Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	
Housing capacity should be removed from these allocations as residential use is considered incompatible with the operation of the safeguarded cement and aggregates rail depot adjacent.	These sites are considered to be appropriate for mixed use development, including a making a significant contribution to meeting the borough's identified housing needs. It is considered that the Plan includes appropriate policies to ensure existing neighbouring uses are not compromised.
Welcome and support the allocation. Agree that development must be taken forward in a co-ordinated way, working jointly with other landowners. As an adjacent landowner, expect any scheme to have properly explored options to improve connectivity through the Camley Street bridge underpass, which is also supported by London Plan policy D2 Infrastructure requirements. Expect any scheme to have considered opportunities to activate and maximise opportunities for the adjacent Cedar Way land.	Support welcomed. Comment noted.
There is a Network Rail maintenance depot on Cedar Way which should be considered for a residential / mixed use development accessed off Cedar Way.	It is not clear if this is being formally proposed as a new site allocation. Insufficient information has been provided to date to justify an allocation.
Support the allocated use for permanent self contained homes and employment (including research and knowledge based uses, light industrial, maker spaces, offices) Support the Camley Street Neighbourhood Plan aspirations for a blend of mixed land uses. Also support the vision of the Council's adopted Canalside to Camley Street SPD for the area. The Local Plan Proposed Submission Draft should further emphasise the sentiment to enable flexible uses in principle no.6, which lists the variety of employment spaces and facilities that could meet the needs of both existing and new business uses.	Support welcomed. The allocation is considered to include an appropriate level of flexibility.
Text does not go far enough to support a greater intensification of land uses on this suitable land. Must align with the sentiment of the emerging London Plan to support flexible uses as part of the wider co location and hybrid use strategy. The Local Plan should further emphasise the sentiment to enable flexible uses in principle no.6, which lists the variety of employment spaces and facilities that could meet the needs of both existing and new business uses.	The allocation seeks to intensify the employment space and optimise the use of the site through efficient design. The allocation is considered to include an appropriate level of flexibility.

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

Number of representations: approx. 6

Representations received from:

- Reef and Partners Ltd
- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development.	Comment noted and we will propose a modification.
Welcome many of the new policies in the Plan and support its aspirations to deliver growth across the Borough. Endorse many of the points raised by the London Property Alliance's Camden Working Group which has made representations on behalf of the industry. Background information on the former Parcelforce site at 24-86 Royal College Street.	Support welcomed. Comment noted

Main Issues	Councils Response
Broadly supportive of the aspirations of draft allocation S7. Given the support for and importance of maintaining investment in the Knowledge Quarter to facilitate its growth it is important the potential of the Site to positively contribute to these aspirations in a major way is both recognised and explicitly supported and actively encouraged within the site allocation. The delivery of research and development/life science uses should be recognised as a priority and key driver for the Site.	The allocated uses for the site include “employment (including research and knowledge-based uses)”.
Beyond the site selection topic paper statement that “site capacity design work” for housing has been carried out, it is not apparent how the Site’s residential capacity has been formulated, nor why the indicative housing capacity has increased from 250 homes in the 2020 draft site allocation to 280. The allocation should not be prescriptive and the quantum should be guided by the design process and balancing the employment and residential priorities.	Beyond the site selection topic paper statement that “site capacity design work” for housing has been carried out, it is not apparent how the Site’s residential capacity has been formulated, nor why the indicative housing capacity has increased from 250 homes in the 2020 draft site allocation to 280. The allocation should not be prescriptive and the quantum should be guided by the design process and balancing the employment and residential priorities.
Welcome that the draft allocation recognises that the site could be appropriate for tall buildings. The height prescribed in the policy should not be seen as a cap on height but height should be considered based on detailed design.	The Camden Building Heights Study identified this site as a location where a tall building may be an appropriate form of development and identified a potentially appropriate range, as reflected in the allocation. The acceptability of any tall building proposals will be assessed against the allocation, Policy D2 (Tall Buildings) and other relevant development plan policies.
Welcome that the allocation acknowledges the two different ownerships. The allocation could include more detailed guidance about how the Council imagine the sites being delivered separately from a design and site capacity perspective.	The level of detail in the allocation is considered appropriate.

Site Allocation Policy S8 - St. Pancras Hospital

Number of representations: approx. 13

Representations received from:

- Thames Water
- Kings Cross Central Limited Partnership

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development.	Comment noted and we will propose a modification.
S8 is in line with national policy and deliverable within the timeframe of this plan, and is sound. Support King’s Cross Central Limited Partnership’s representations.	Support welcomed.
KCCLP strongly support the inclusion of St Pancras Hospital as a Site Allocation. However, as set out in previous representations, certain elements of the allocation and supporting text remain unsound as they do not reflect: the site specific constraints; the economic and financial viability considerations for developments; and the supporting evidence base.	Comment noted.
Key to the success of the new routes and spaces is their activation with ground floor uses open to the public. To facilitate this, the emerging proposals for the site should include ground floor retail as well as food, drink and leisure uses.	The site is not within a town or neighbourhood centre and it is therefore it not considered appropriate to make a specific reference to retail, food, drink and leisure uses as proposed uses. Any proposals for retail etc on the site will be considered against the allocation and all other relevant Local Plan policies.
Text on housing is not justified or consistent with National Policy. The fifth bullet under the ‘Context’ section and Part 3 under the “Development and Design Principles” are inconsistent with draft Policy H2.	The wording is considered appropriate and consistent with national policy. It reflects that permanent self-contained residential use is the priority use of the Plan. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing

Main Issues	Councils Response
Site Allocation S8 should include a cross ref to H2 in line with all the other site allocations in the South Area	This site is allocated for health and self contained homes. The health facility is under construction on part of the site, therefore the remainder is considered to be predominantly for housing provision. Any planning application would be assessed against all relevant Local Plan policies including Policy H2. Additional wording is therefore not considered necessary.
It is important to clarify in the site allocation text that the delivery of homes will be subject to site constraints and viability.	As noted in Local Plan paragraph 1.36, site allocation housing capacities are indicative. Paragraph 1.40 states that a larger or lower number may be supported where this can be justified. It is not necessary or appropriate to repeat this text in individual applications.
Housing - Policy should be amended to read - Context (fifth bullet): "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, <u>having regard to relevant Local Plan policies including Policy H2</u> <u>Part C.</u> "	This site is allocated for health and self contained homes. The health facility is under construction on part of the site, therefore the remainder is considered to be predominantly for housing provision. Any planning application would be assessed against all relevant Local Plan policies including Policy H2. Additional wording is therefore not considered necessary.
Policy should be amended to read - Development and Design Principles Part 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, <u>having regard to relevant Local Plan policies including Policy H2 Part C.</u> "	This site is allocated for health and self contained homes. The health facility is under construction on part of the site, therefore the remainder is considered to be predominantly for housing provision. Any planning application would be assessed against all relevant Local Plan policies including Policy H2. Additional wording is therefore not considered necessary.
Development and Design Principle 4 is not required and the text should be removed. It is unclear why the text in the Regulation 18 version has been changed. The text is not consistent with Draft Plan policy D5 (Historic Environment) which refers to conserve and where appropriate enhance heritage assets. Policy D5 also sets out policy (as does the NPPF) to address instances where there is loss of or harm to heritage assets.	Criterion 4 considered appropriate as heritage is a relevant issue for this site. We will propose a modification to ensure the wording is consistent with Policy D5.
The policy is not justified. Reference to the water tower being a distinct landmark should be removed from the "Context" section. There has been significant change in character and context since the conservation area appraisal that is not accounted for.	The wording in the second bullet of the Context section is a factual reference that reflects the content of the Conservation Area Appraisal Statement.
The approach to building heights is not justified. No further evidence base has been produced relating to building heights and yet the approach to the height range in the policy still does not follow the methodology set out in the Building Heights Study evidence base document (January 2024). Page 25 of the study specifically notes that: "Table 2.1 sets out the tall building's classification including the ways how different tall building types will be perceived and the impact they may have on the skyline." The Study only provides an 'Approximate Upper Tall Building ("TB") Ratio' of up to 2x future Context Height ("CH"), not 3x CH up to 5x CH in line with Table 2.1. The Site Allocation text is unclear how proposals will be considered where building heights over 45m are proposed. As such, this wording needs to be reviewed.	The approach in the Local Plan is consistent with the Building Height Study. Table 2.1 of the Study sets out a broad conceptual categorisation of tall buildings in Camden. Section 5 considers of the appropriateness of particular locations for tall buildings, and includes recommendations setting out the results of detailed assessments for individual sites taking into account site specific factors. The heights referred to in the Plan's site allocations reflect these recommendations. The allocation clearly states that 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.
Amend to read - Development and Design Principles: "The Camden Building Height Study identified this site as a location where tall buildings may be an appropriate form of development, with a 12m – 45 m considered the potentially appropriate height range identified in the study . 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. 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"	It is not considered appropriate to remove the wording relating to the potentially appropriate heights. This is consistent with the findings of the Camden Building Heights study and the approach taken on other site allocations. The suggested additional text has been included for relevant sites in strategic viewing corridors or panoramic views identified in the London View Management Framework. This site is not within those protected views and it would therefore not be appropriate to include the proposed wording.

Site Allocation Policy S9 - Shorebase Access

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s	Comment noted and we will propose a modification.

Site Allocation Policy S10 - Bangor Wharf and Eagle Wharf

Number of representations: approx. 7

Representations received from:

- Thames Water
- Carter Jonas
- Canal and River Trust

Main Issues	Councils Response
Welcome the reference to moorings (“Development must: 6. consider the provision of infrastructure for canal moorings alongside the site.”) the Trust would require an Operating Proposal be submitted by any developer seeking to implement this, to assess the plans and review navigational safety and sight lines.	Support welcomed. No wording change is considered necessary. This would be dealt with at the planning application stage.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
The current wording of Site Allocation Policy S10 (Bangor Wharf and Eagle Wharf) would result in the site being undeliverable. As currently drafted, the policy is unsound. Provide an overview of the site history and constraints. For more than 10 years, development proposals have sought to come forward on this site. It has been 12 years since the site was first allocated and yet, it still does not benefit from planning permission for redevelopment. A residential scheme on this highly constrained site, is not suitable	See responses to detailed comments below.
It is not commercially viable to deliver residential development on the site, as demonstrated by the chequered planning history of the site outlined. As currently worded, the site cannot be relied upon to form part of the Council’s five year housing land supply and the residential element of Site Allocation Policy S10 is unsound.	The allocation identifies an indicative capacity of 50 homes as part of a mixed use scheme across the two sites covered by the allocation (not just on one element of it). Due to the acute need for housing in Camden, it is considered justified and necessary for the Council to take every available opportunity to deliver additional housing. It is considered possible to viably provide housing as part of the development on these sites. The site is no longer identified in the 5 year housing land supply, with delivery anticipated to be 2031/32 in the updated Housing Trajectory.
Bangor Wharf and Eagle Wharf are in two separate ownerships. Co-joining these two separate sites into one site allocation frustrates delivery. The site allocation should be separated into two site allocations with the housing use focused on Eagle Wharf, which is more suitable for residential use using the existing building, and employment use allocated on Bangor Wharf. There has never been a scheme forthcoming that combines the sites.	Separate ownership does not preclude sites being considered as a joint allocation. We consider that co-ordinating development can optimise development and its benefits.
Due to the site’s constraints, it is much more suitable for employment uses such as office, laboratory or life science uses. Housing is not considered a suitable or viable use whereas employment use is feasible.	Policy S10 allocates the sites for self contained homes and employment uses. Employment covers a wide variety of uses (as set out in Para 9.9) and would include offices, laboratory and life science uses. A mixed use development is considered appropriate given the acute need for housing for housing in Camden.

Main Issues	Councils Response
The following modifications are requested to make Site Allocation Policy S10 sound and legally compliant - Eagle Wharf and Bangor Wharf should be separated into two site allocations, to align with ownership. Bangor Wharf should be allocated for employment uses and the housing use should be allocated to Eagle Wharf. - If the allocation is not separated into two, then the housing allocation should be removed from Site Allocation S10, as it is not a viable or suitable use.	Separate ownership does not preclude sites being considered as a joint allocation. Co-ordinating development can optimise development and its benefits. Therefore it is not considered necessary to separate the sites. A mixed use development is considered appropriate. Given the acute need for housing in the borough and the need to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing.

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

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	Comment noted and we will propose a modification.

Site Allocation Policy S12 - Belgrove House

Number of representations: approx. 3

Representations received from:

- Thames Water
- Transport for London

Main Issues	Councils Response
We welcome the amendments made in line with our response to the Regulation 18 consultation, including that TfL is a key consultee for the site due to its status as a site of surface interest.	Support welcome.
Part 6 - The policy should make clear that an integrated, step-free entrance to Kings Cross St Pancras station should be delivered as works in kind and secured through an appropriate planning obligation.	The permitted scheme - which includes an integrated step-free entrance - is under construction. No change to the wording is considered necessary.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Site Allocation Policy S13 - Former Thameslink Station, Pentonville Road

Number of representations: approx. 10

Representations received from:

- Thames Water
- Network Rail
- The Innova Partnership
- Places for London - Network Rail

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
Network Rail are investigating the opportunity to bring forward a comprehensive redevelopment on this	Comment noted.

Main Issues	Councils Response
brownfield site. Support the consultation submission by Innova Partnership. Network Rail and Places for London are working in partnership on bringing this site forward and have submitted a joint response.	
Suggest the following revisions: 'Allocated Use: Employment (including knowledge-based uses, maker spaces, offices) and / or hotel, student accommodation and permanent self-contained homes <u>with scope for retail and food and drink uses at lower levels.</u> ' The exact land use mix would depend on which land use performs best in terms of viability and deliverability and responding to the particular site constraints.	The allocated uses set out the Council's preferred position for this site. Knowledge-based uses, maker spaces and offices, alongside housing, are considered appropriate uses. Hotel provision on this site would reduce its potential to contribute towards delivering homes to meet identified need. Food and drink uses are not considered a priority for this site and would reduce the ability to secure employment and housing provision.
Building conventional self-contained housing in Class C3 use above and immediately adjacent to live rail and tube lines and operational infrastructure is likely to be challenging and the immediate context is relatively sensitive in terms of the adjacent night time uses. Other forms of non-conventional housing might be more compatible. Therefore welcome the inclusion Development and Design Principle 3.	Support welcome
Policy D2 provides a criteria for assessing planning applications which include buildings above the draft Local Plan height thresholds. This is a sensible and pragmatic approach which is welcomed. The site could be an appropriate location for a well-designed high density mixed use development with stepped massing which responds positively to the surrounding heritage context. We therefore welcome that the site allocation states that: 'development must ensure that a design-led approach is taken to delivering the optimum amount of development on the site.'	Support welcomed.
Support requirement relating to need for entrance / exit.	Support welcomed.
Concerned that the site allocation boundary has been reduced significantly since Reg 18 stage. The revised boundary does not reflect the extent of joint TfL and Network Rail ownership or the most optimal form of development which we would ideally intend to bring forward on the site. Do not object to the removal of the Scala. The removal of 366 Gray's Inn Road and the Thameslink and Metropolitan Line tracks removes the potential to bring forward a more comprehensive decked development and would be sub-optimal. The site allocation boundary should follow the submitted boundary. Whether we progress the more comprehensive decked development option (or the more reduced ticket hall site area only) will ultimately depend on economic viability and overall deliverability. We understand that the reduced site allocation boundary was because officers considered that there is no evidence or feasibility work to date to support the viability or deliverability of decked / 'over-track' development. However We undertook detailed technical work during 2017 which we will share with the Council and intend to share updated feasibility work in due course.	Insufficient information has been provided to date to determine whether the wider site (particularly the air space over live tracks) is deliverable or viable. We understand that this work is underway and will consider it if provided.
The site would benefit from a wider range of use classes including a Class C1 hotel or sui generis student accommodation. The wording should be revised to read: 'Employment (including research and knowledge-based uses, maker spaces, offices), hotel, student accommodation and permanent self-contained homes'.	The allocated uses set out the Council's preferred position for this site. Knowledge-based uses, maker spaces and offices, alongside housing, are considered appropriate uses. Hotel provision on this site would reduce its potential to contribute towards delivering homes to meet identified need.
Consider that bullet point 2 could be merged with bullet point 1, removing reference to including research and knowledge based uses and small workshops.	Knowledge-based uses and maker spaces and offices are considered appropriate uses for this site. It is considered appropriate to retain two separate criteria.
It would be helpful to include in bullet point 2 a reference that a tall building is acceptable at this location having regard to the London View Management Framework SPG.	The site was not identified in the Camden Building Height Study as a location where tall buildings may be an appropriate form of development, Therefore, a reference is not considered appropriate. Any application for a tall building would be assessed against Policy S13, Policy D2 (Tall Buildings) and all other relevant policies.

Site Allocation Policy S14 - Land at Pakenham Street and Wren Street

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Sewer treatment works RAG assessment 'orange' We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Site Allocation Policy S15 - Land to the rear of the British Library

Number of representations: approx. 3

Representations received from:

- Thames Water
- Transport for London

Main Issues	Councils Response
Parts 8 & 9 - We welcome the amendments made to the policy, in line with our response to the Regulation 18 consultation.	Support welcome.
The section on infrastructure requirements should be updated to state that any future proposals for this for the site would need to have a contribution secured towards a new Cycle Hire station commensurate with the scale of development.	Any future contribution towards a cycle hire station would be assessed at the planning application stage against relevant transport policies. It is not considered necessary to add a specific reference in allocation S15.
Sewer Treatment Works catchment Beckton. We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth. In order to make an assessment we require information on the proposed scale of development.	Comment noted. No change required.

Site Allocation Policy S16 - Former Central St Martins College

Number of representations: approx. 2

Representations received from:

- Thames Water
- Theatres Trust

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
No objection to principle of redevelopment. The vacant Cochrane Theatre was technically well equipped and holds social significance for the nature of its programme in 1960's. There is an existing recording condition attached to the current planning permission and we reiterate that this should be maintained, we suggest that it is noted under 'Other Considerations' within the policy.	We will propose a modification to address this.

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

Number of representations: approx. 2

Representations received from:

- Thames Water
- Transport for London

Main Issues	Councils Response
Part 5 - We welcome the clarification that development must remove existing on-site car parking, in line with the London Plan Policy T6 and the Council's car free approach set out in the Local Plan Policy T5.	Support welcome.
Sewer Treatment Works catchment Beckton. We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth. This site has planning approval so we have not undertaken any further assessment. If the proposal changes we will need to reassess.	Comment noted. No change required.

Site Allocation Policy S18 - 135-149 Shaftesbury Avenue

Number of representations: approx. 3

Representations received from:

- Historic England
- Thames Water
- Theatres Trust

Main Issues	Councils Response
Support the changes made to Clause 1 and note the changes to 6, but consider it needs further change. Any upward extension could have potential harm to the significance of the listed building depending on its size and form, not just an impact on the townscape and conservations area. Suggested wording 'ensure that where an upwards extension is proposed, this is of the highest architectural quality to complement and enhance of a height, massing and architectural quality appropriate to the form and significance of the Grade II host building, is of a height and massing that is appropriate to and responds to the site's surrounding townscape and neighbouring conservation areas'.	The current wording is considered appropriate. These matters are covered in Policy D1 Achieving Design Excellence and Policy D5 Historic Environment. Development proposals will be assessed against these and all other relevant plan policies.
Sewer Treatment Works catchment Beckton. We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth. In order to make an assessment we require information on the proposed scale of development.	Planning permission has been since granted so no change proposed
This is an important building representing the only realistic opportunity of delivering a new larger-scale theatre within the West End 'Theatreland' cluster. We continue to welcome and support inclusion of this site as an allocation in particular a direction that development would not compromise of viability and function for theatre, cinema or similar performance/cultural use.	Support welcomed.

Site Allocation Policy S19 - Cockpit Yard and Holborn Library

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Main Issues	Councils Response
Sewer treatment works RAG assessment 'orange' We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	

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

Number of representations: approx. 21

Representations received from:

- Network Rail
- Thames Water
- Tarmac Trading Ltd
- YC CFQ Ltd
- Heidelberg Materials UK
- London Gypsies and Travellers
- Residents

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development.	Comment noted. No change required.
Background on ownership and the operation of the neighbouring land as a concrete batching plant, aggregate storage facility and cement rail terminal. Some operations are 24 hour and involving the use of machinery make noise. The operations occasionally require work at night.	Comments noted
Particularly concerned that two nearby sites are proposed for mixed use development (site allocations S6 and S20). The residential element of the proposals is of concern because it would bring sensitive receptors to the source of potential nuisance. Specifically, residents of new dwellings proposed at these sites are likely to be disturbed by noise from the nighttime unloading of aggregates and cement.	Both site allocation policies include criteria to ensure that the design and layout of the proposed 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). Given this, no change is considered necessary.
In the case of site allocation S20, there would also be disturbance due to the movement of HGVs along Freight Lane both day and night. Design principle 9 for S20 proposes the improvement of conditions for pedestrians and cyclists along Freight Lane. This would be inappropriate due to the industrial nature of the road as the only means of vehicular access to the safeguarded rail depot. This should be removed.	It is considered that criteria 9 of Policy S20 is worded with sufficient flexibility to allow for this issue to be considered as part of the planning application process, based on the evidence provided, and a planning balance to be struck.
Support the allocation. Particularly that any scheme should consider both the immediate and future impact on the railway and its operations, including respecting Agent for Change principles and that design should enable co location of housing, employment and railway operational uses and optimise the provision of additional houses both on site and wider area.	Support welcome.
Network Rail want discussions with Camden Council about this site to ensure that site to the North - Murphys - is not prejudiced.	Comment noted.
Background information about the site, planning permissions and site plan.	Comment noted.
Allocation S20 York Way Depot and adjacent land at Freight Lane directly north of Tarmac's Kings Cross Plant. Its current use is compatible with the operations at the Tarmac's Plant as it is not considered sensitive development. The assessment in the Site Selection Topic Paper considers the Allocation Site to be suitable as it is a brownfield site, is located in an area with a high Index of Multiple Deprivation score; and has good accessibility. The assessment identifies multiple constraints with the Site, including being 'nearby an Aggregate Safeguarding Site' and 'Noise'.	Comment noted

Main Issues	Councils Response
The policy remains vague and does not set out how impacts from the existing committed development (i.e. Tarmac's Concrete Plant) can be mitigated e.g. through allocation layout amendments or screening. Concerned about the juxtaposition of potential conflicting land uses (particularly the potential for sensitive residential receptors) without any detailed guidance. Tarmac's operations can take place throughout the night for 30 days per year. Inevitably, this would give rise to adverse noise impacts to any sensitive receptors, and this operation is protected by the Agent of Change principle. The residential element should be removed from this allocation or more detailed guidance provided which is explicit on the importance of the continued use/function of the aggregate developments. Furthermore, Policy A1 seeks 'to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas', the residential element does not align with the characteristic of the surrounding area, which is a well-established and long-standing industrial area.	The site allocation policy includes a criteria to ensure that the design and layout of the proposed 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). It is considered to provide an appropriate level of detail for a site allocation policy.
Proposing to improve Freight Lane for pedestrians and cyclists is inappropriate as this is sole access route to both concrete plants and would undermine the ability for the site to operate as an aggregate facility.	It is considered that criteria 9 of Policy S20 is worded with sufficient flexibility to allow for this issue to be considered as part of the planning application process, based on the evidence provided, and a planning balance to be struck.
There should be a policy relating to the Aggregate Safeguarding Area, setting out the definition and criteria for any development both within or adjacent to the area to follow.	Policy S1 South Camden Part Q states that 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." Furthermore Policy T6 Sustainable Movement of Goods, Services and Materials states that the Council will protect existing facilities for waterborne traffic and rail freight traffic. The aggregates safeguarding area is also defined on the Policies Map. Given this, no additional wording is considered necessary.
Agent for change principles should be included when referring to mineral processing / transfer facilities	Policy A1 Amenity requires 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. Site allocation policies S5, S6 and S20 (the site allocations adjacent to the aggregates safeguarding area) also make reference to the agent of change. As the plan should be read as a whole, no additional wording is considered necessary.
As a Mineral Planning Authority Camden must protect the aggregate site. Residential use should be removed from the allocation due to contradictory land uses, contrary to A1 and A4 and Agent for change principles and should protect the safeguarded status of adjacent site.	Comments noted. Policy S1 South Camden Part Q states that 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." Furthermore Policy T6 Sustainable Movement of Goods, Services and Materials states that the Council will protect existing facilities for waterborne traffic and rail freight traffic. The aggregates safeguarding area is also defined on the Policies Map. Given this, no additional wording is considered necessary.
Policy should mention protecting the aggregate handling and processing site and set out how it will protect the status of the Aggregate Safeguarding Area	Comments noted. Policy S1 South Camden Part Q states that 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." Furthermore Policy T6 Sustainable Movement of Goods, Services and Materials states that the Council will protect existing facilities for waterborne traffic and rail freight traffic. The aggregates safeguarding area is also defined on the Policies Map. Given this, no additional wording is considered necessary.
Support the development and design led principles providing that the allocated uses do not preclude the potential intensification of depot uses on the site. It is understood that the potential relocation of the Holmes Road depot facilities onto this site is being considered. This should be allowed for within the policy wording.	Support welcomed.
Support the principles subject to ensuring allocated uses do not preclude the potential relocation of Holmes Road depot facilities. This should be specified.	The allocated uses for this site refer to depot facilities. Given this no change to wording is considered necessary.

Main Issues	Councils Response
The most significant improvement is the allocation of two parcels of land suitable and deliverable for two Gypsy or Traveller sites in Camden. Feedback from Gypsy and Traveller residents of Camden support these allocations with the following comments: Land off Freight Lane, N1C 4BE This could also be an excellent five-pitch site for which we would like to see designs, especially if the train noise from the Eurostar could be blocked. We are used to the noise of Camden, including the trains. However it is better if there are sound barriers. At the same time, concrete walls feel like a prison if they are from more than one side. If it's a nice area with a five-pitch site with trees, a bit tucked away from other residents, that would be a very good site with plenty of space.	Support welcomed. Our initial design led capacity work shows that the land at Freight Lane could potentially accommodate 4 pitches.
We received approx. 5 objections to the allocation of this site to provide accommodation for Gypsies and Travellers.	The Council has a statutory obligation to plan for the needs of Gypsies and Travellers and a duty to consider the housing needs of all our residents. The land adjacent to Constable House and land at Freight Lane were considered to be suitable and available for allocation to help meet the accommodation needs of Gypsies and Travellers, following a detailed Gypsy and Traveller Site Identification Study and further assessment work. Further information on the approach taken in the Local Plan to help meet the accommodation needs of Gypsies and Travellers in Camden is set out in the Gypsy and Traveller Topic Paper.

Site Allocation Policy S21 - Agar Grove Estate

No responses received

Site Allocation Policy S22 - 6 St Pancras Way

No responses received

Site Allocation Policy S23 - Tybalds Estate

No responses received

Site Allocation Policy S24 - 294-295 High Holborn

No responses received

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

No responses received

Site Allocation Policy S26 - 8 -10 Southampton Row

No responses received

Site Allocation Policy S27 - Middlesex Hospital Annex, 44 Cleveland Street

No responses received

Site Allocation Policy S28 - Central Somers Town

No responses received

Site Allocation Policy S29 - Chalton Street, Godwin and Crowndale Estate

No responses received

Site Allocation Policy S30 - Birkbeck College, Malet Street

No responses received

Site Allocation Policy S31 - Senate House (NW quadrant), Malet Street

No responses received

Site Allocation Policy S32 - 20 Russell Square

No responses received

Chapter 4 – Central Camden

Number of representations: approx. 6

Representations received from:

- Belsize Conservation Area Advisory Committee
- Primrose Hill Conservation Area Advisory Committee
- Highgate Conservation Area Advisory Committee
- Resident

Main Issues	Councils Response
The recognition of the importance of conserving or enhancing the significance of the Grade II* Roundhouse and its setting, and respect locally important views in accordance with Policy D5 (Historic Environment) of Site Allocation Policies C10 and C11 is welcomed. Object to the ineffectiveness of these considerations in recent planning decisions, especially 100 & 100A Chalk Farm Road NW1 8EH (2024/0479/P revised) and Camden Goods Yard Chalk Farm Road NW1 8EH (2017/3847/P, as amended by permission refs. 2020/0034/P, 2020/3116/P and 2022/3646/P). Planning policy which is ineffective undermines both heritage and its benefits and community trust in democracy.	Support welcomed. Comment noted.
We are concerned in terms of suitability and deliverability that the largest proportion of new homes would be provided in tall buildings - for the suitability of the form of housing for families especially large families which is the largest group on your waiting list; and the impact both on local town centres and on key vistas. Highgate CAAC challenges the assertion that the following sites are “Locations where tall buildings may be an appropriate form of development”: - F C2 Regis Road and Holmes Road Depot G C3 Murphy Site K C13 West Kentish Town Estate L C15 Wendling Estate and St Stephens Close N C23 Former Flats 121–129 Bacton, Haverstock Road (see Figure 22 Tall Buildings on p 456).	The Plan reflects the results of the Camden Building Heights Study carried out to ensure consistency with the London Plan. The policy makes clear that the acceptability of particular tall building proposals will be assessed against Policy D2 on tall buildings and other relevant Plan policies.
The protections to views and vistas afforded by The London Plan (2021) and other legislation should apply to all the locations included in “Table 12 Locations where tall buildings may be an appropriate form of development”.	Local Plan policy D2 sets out the criteria against which tall buildings will be assessed, which includes reference to preserving protected strategic views in Part C.9.
The “Infrastructure Requirements” sections in each Site Allocation in “Chapter 4 - Central Camden” should reflect the protection of views of Central London from Kenwood and Parliament Hill. Site Allocations for the following sites should include in their Infrastructure Requirements that the “Development must...” comply with Policies C2, HC3 and HC4 of The London Plan (2021) and any other relevant laws, regulations and policies which protect views to Central London from damage by excessively tall, massive or unsightly and inappropriate developments. Table 12 Locations where tall buildings may be an appropriate form of development F C2 Regis Road and Holmes Road Depot G C3 Murphy Site K C13 West Kentish Town Estate L C15 Wendling Estate and St Stephens Close N C23 Former Flats 121–129 Bacton, Haverstock Road.	All applications for tall buildings will be assessed against all relevant policies. This includes policy D2, which includes consideration of historic context and the relationship between the building and hills and views; policy NE1 - Nature Environment, which states we will take into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath; Policy D1 on Design, policy D5 on Heritage and relevant London Plan policies which will include HC2, HC3 and HC4, and Policy D9 on Tall Buildings.
Fig 11: It would be helpful to show public and private open spaces separately.	Figure 11 is for illustrative purposes only. No change is considered necessary.

Policy C1 – Central Camden

Number of representations: approx. 43

Representations received from:

- Residents (Camden Nature Corridor)
- Transition Kentish Town
- Heath and Hampstead Society
- Joseph Homes
- Kentish Town Neighbourhood Forum
- Transport for London
- City of London Corporation
- Transition Kentish Town
- General Projects
- Ingestre Road TRA
- Future Transport London
- Bug Life
- TRACT

Main Issues	Councils Response
Support the Camden Nature Corridor - Supporting nature in London is vital, both for our survival and for maintaining the area as a pleasant place for us all to live in. Nature is essential, not a luxury."	Support welcomed
Policy C1 Central Camden, Part O, Criteria 1 - Camden Town Station is not programmed for improvement works at this time.	Comment noted.
Policy C1 Central Camden, Part O, Criteria 2 - Camden Town Station is not programmed for improvement works at this time and is unlikely to be in the next 10 years.	Comments noted.
Policy C1 Central Camden, Part O, Criteria 3 - This would be welcomed but appears to be in conflict with the delivery of the High Line.	The draft Local Plan is supportive of both the Highline and the upgrade to the north London line to re-instate four tracks and deliver a third platform at Camden Road overground station. We envisage that these would happen sequentially.
Policy C1 Central Camden, Part O, Criteria 4 - the development of the Highline should not be identified as a key infrastructure priority in the Local Plan, as it doesn't represent value for money.	The Plan reflects that planning permission has been granted for the first phase of the Highline.
Step-free access and capacity upgrades at Camden Town Underground Station will not happen whilst TfL continues to delay the promised rebuilding of the tube station.	Comment noted.
Surely the objectives of the Highline and a third platform at Camden Road overground station contradict one another. It is surely impossible to support the Camden Highline whilst re-instating four tracks and a third platform at Camden Road station.	The draft Local Plan is supportive of both the Highline and the upgrade to the north London line to re-instate four tracks and deliver a third platform at Camden Road overground station. We envisage that these would happen sequentially.
Policy C1 Part O - the delivery of the Highline and the re-opening of the 4-track version of the North London Line / Overground through Camden Road are surely incompatible. Reference to the Highline should be deleted from the plan.	The draft Local Plan is supportive of both the Highline and the upgrade to the north London line to re-instate four tracks and deliver a third platform at Camden Road overground station. We envisage that these would happen sequentially. The plan reflects that planning permission has been granted for the first phase of the Highline.
The Local Plan should not support the delivery of the Highline. Instead, it should support the use of that land for London Overground trains and freight trains through Camden Road Station.	The draft Local Plan is supportive of both the Highline and the upgrade to the north London line to re-instate four tracks and deliver a third platform at Camden Road overground station. We envisage that these would happen sequentially. The plan reflects that planning permission has been granted for the first phase of the Highline.
Support the requirement to upgrade the North London Line, to reinstate four tracks and deliver a third platform at Camden Rd Overground Station	Support welcomed.
The delivery of the Highline is incompatible with the upgrade the North London Line, to reinstate four tracks and deliver a third platform at Camden Rd Overground Station. Reference to the Highline should be deleted from the plan.	The draft Local Plan is supportive of both the Highline and the upgrade to the north London line to re-instate four tracks and deliver a third platform at Camden Road overground station. We envisage that these would happen sequentially. The plan reflects that planning permission has been granted for the first phase of the Highline.
Part O - Infrastructure, Part I - We welcome the amendments made to include Chalk Farm station as a priority for step-free access. It should be noted however that further investigation internally has found that it will be exceptionally challenging to deliver step-free access at this	Support welcome. Comment noted.

Main Issues	Councils Response
station. While there may still be an opportunity to do so, it will be dependent on providing access from Site Allocation C8 Former Morrisons petrol filling station.	
Part O, 2 - We welcome the amendments made to include capacity upgrades at Camden Town Underground station in light of existing capacity constraints.	Support welcome.
Part O, 3 - We welcome the amendments made to the policy to reflect the potential need to reinstate four tracks and a third platform on the North London line to meet future passenger and freight demand.	Support welcome.
As the needs of the NHS will change over time, ongoing consultation with the ICB will be required to ensure that the delivery of an Integrated Care Hub is the most efficient way to deliver its priorities.	Comment noted.
Support Camden's Local Plan with clear guidance for the future development of Murphy's Yard, Regis Road and West Kentish Town Estate. These developments should bring about the delivery of the community-led Camden Nature Corridor. Encourage trees, plants and wildlife by ensuring that developments include ample green spaces for wildlife.	Support welcomed.
Support the majority of the policies on the natural environment and welcome stronger wording from the Reg 18 draft on the protection of ancient & veteran trees; replacement of lost trees; support for native species; encouragement of nature-based solutions. Welcome additional requirements for tree retention and planting on many site allocations.	Support welcomed.
Policy C1 M KTNF has learned through dialogue with local businesses that current policies are making Kentish Town High Street unviable for a number of businesses, with independent retailers and chains not surviving. Some compromises on transport and parking are necessary. More encouragement on the use of pop-ups and meanwhile space is needed to offset non-used frontages.	Comment noted. A.8 in Policy IE1 Growing a Successful and Inclusive Economy supports the introduction of temporary / meanwhile uses in appropriate circumstances.
Policy C1 N Camden Town's economy is increasingly straying into Kentish Town, which has positive and negative impacts. This policy needs a clause (besides the standard licensing procedure which most people aren't aware of) relating to guaranteeing consultation with residents over licensing times and night-time noise.	This is not a matter for the Local Plan.
O Infrastructure 1 "The delivery of step free access at Kentish Town Underground and Thameslink Station; and Camden Town Underground Station." The plan should state whether this is the order of priority.	Comment noted. Policy C1 support the delivery of step-free access at all of the stations mentioned. The order they are listed is not intended to indicate priority.
6 Eastern access to Gospel Oak Overground. The plan needs to be more specific on what type of access.	Policy C1 sets out the Council's overarching strategy for supporting development in Central Camden. Further information on infrastructure provision in this area is set out in the Council's Infrastructure Delivery Plan.
9 Public realm improvements in Kentish Town Centre. More details are required.	Policy C1 sets out the Council's overarching strategy for supporting development in Central Camden. Further information on infrastructure provision in this area is set out in the Council's Infrastructure Delivery Plan.
15 "The delivery of an integrated care hub." This needs more explanation. A previous proposal proved controversial.	Policy C1 sets out the Council's overarching strategy for supporting development in Central Camden. Further information on infrastructure provision in this area is set out in the Council's Infrastructure Delivery Plan.
16 "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." More detail is required of what the cultural uses will entail.	Policy C1 sets out the Council's overarching strategy for supporting development in Central Camden. It is not considered appropriate to specify the nature of any cultural uses in C1.
Policy C1 19 KTNF fully supports the Camden Nature Corridor	Support welcomed
23. The provision of infrastructure for supporting local energy generation. Should include the clause: renewable wherever possible.	Local energy generation should be consistent with Local Plan policy CC7 Heat network, which expects low carbon heat.
General point: The majority of development in Kentish Town understandably is on the Murphy and Regis Road sites, but there needs to be some alternative outlets (Plan	Comment noted. Other sites are allocated in the Plan in the Kentish Town area.

Main Issues	Councils Response
B) if either development gets blocked for a length of time, as previous experience has proved.	
Draft policy C1 is also broadly supported, particularly the infrastructure identified at part O.	Support welcomed.
Policy C1, Part D: As presently worded, the policy precludes any housing which is not “self-contained homes”, including specialist forms of permanent housing such as Purpose-Built Student Accommodation (PBSA) and Large-Scale Purpose-Built Shared Living (LSPBSL) (also commonly referred to as “Co-living”), for which there is an identified need both locally and strategically. Regis Road is ideally located for both PBSA and LSPBSL. It is critical, therefore, that the Camden Local Plan (particularly policies C1, C2, H1, H9 and H10) does not close off options for other forms of permanent housing such as these.	Permanent self-contained housing is the priority land-use of the Local Plan and policies C1 and C2 reflect this. No change is considered necessary.

Site Allocation Policy C2 - Regis Road and Holmes Road Depot

Number of representations: approx. 96, including a petition concerning the recycling centre

Representations received from:

- Residents (with regards to the recycling centre)
- Big Yellow Storage
- Network Rail
- Holmes Road Recognised Tenants Association
- Thames Water
- Create Reit
- YC CFQ Ltd
- NHS HUDU
- Transport for London
- Kentish Town Neighbourhood Forum
- Joseph Homes
- Inkerman Area Residents Association

Main Issues	Councils Response
Support the retention of the recycling centre at Regis Road	Support welcomed.
Object to the proposed relocation of the Regis Road Recycling Centre to Holmes	The draft Local Plan sets out an overarching policy framework to guide the redevelopment of the Regis Rd and Holmes Rd depot site. Site Allocation Policy C2 states that: “Development must 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.” However, the Local Plan does not indicate a preferred location for the recycling centre, either within the site or elsewhere. The Council's Regis Road Area Guidance, which does refer to Holmes Road as a potential location for a relocated recycling centre, is a separate document to the Local Plan. We have passed this comment on to relevant Council officers.
We welcome the further requirement to explore north-south permeability across the railway.	Support welcome.
The site allocation does not make reference to the existing mental health facility owned by North London NHS Foundation Trust. We therefore suggest the following change to the policy wording: 7. seek to retain existing businesses <u>and other users/ occupiers</u> 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 <u>and other users/ occupiers</u> to understand their requirements, ambitions and the potential for re-provision or relocation. A business retention / relocation strategy must be provided as part of the planning application for the site.	The allocated uses include community uses, which would include a mental health facility. Part 15 of the allocation provides for contributions towards the provision of new community facilities and/or the improvement of existing facilities in accordance with Policy SC3 (Social and Community Infrastructure). The suggested additional text is therefore not considered necessary.

Main Issues	Councils Response
The “Infrastructure Requirements” sections in each Site Allocation in “Chapter 4 - Central Camden” should reflect the above protection of views of Central London from Kenwood and Parliament Hill.	Relevant site allocations identify that the site is within a view identified in the London View Management Framework, including sites C2 C3, C15 and C23. Applications for tall buildings will be assessed against all relevant policies including Local Plan policy D2 on Tall Buildings; policy D1 on Achieving Design Excellence, which seeks to preserve protected strategic views; policy D5 on the Historic Environment, and London Plan Policy D9 on Tall Buildings. Protected strategic views are shown on the Local Plan Policies Map.
The Infrastructure Requirements for these site allocations should be amended to state that “Development must...” comply with Policies HC2, HC3 and HC4 of The London Plan (2021) and any other relevant laws, regulations and policies which protect views to Central London from damage by excessively tall, massive or unsightly and inappropriate developments.	The London Plan forms part of the statutory development plan for Camden and other London boroughs, as recognised in Local Plan paragraph 1.8 and Figure 01. Therefore, relevant London Plan policies are taken into account as necessary when planning applications in Camden are assessed. It is not therefore necessary to make specific reference to London Plan policies in the site allocations for particular sites.
These sites are not suitable for tall buildings	The locations identified as potentially suitable for tall buildings in the Local Plan reflect the findings of the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary. Sewer treatment works RAG assessment 'orange' We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	We will propose a modification to update information.
Policy C2 4 KTNF thinks this is a useful clause with a general tendency for other uses to encroach into employment space.	Support welcomed.
11. KTNF welcomes: “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;”	Support welcomed.
Policy C2 18 KTNF fully supports The Camden Nature Corridor.	Support welcomed.
Policy C2 21 KTNF welcomes this approach, but the council must have a mechanism whereby if a request is turned down, as has happened in the past, it is with justifiable reason.	Comment noted.
Policy C2 23 KTNF suggests it should specify that redevelopment includes additional space to meet the growing needs of the circular economy and creation of more employment.	There is no current identified need for the provision of additional space.
24-28 KTNF welcomes the plans for cycle and pedestrian routes through the site, but thinks pedestrians need more protection from cyclists.	Support welcomed. Comment noted.
34 KTNF welcomes the clause: “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)” as this is a central part of the KTNF Neighbourhood Plan. However, the Plan needs to clarify how it would be funded.	Support welcomed. Further information on the funding of infrastructure is set out in the Infrastructure Delivery Plan.
The site is identified as a location where a tall building may be appropriate. Medium density is our preferred approach and design layouts should attempt to move towards this ambition. Medium density in many cases has been proven to create an equal number of homes than taller buildings in a smaller footprint.	The policy reflects the findings of the Camden Building Height Study. The acceptability of particular tall building proposals will be assessed against Policy D2 (Tall buildings) and other relevant development plan policies.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	Comment noted and we will propose a modification.

Main Issues	Councils Response
Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	
Background information confirming the status of the site and that planning permission has been implemented.	Comments noted
Strongly request that wording is added to make it clear that other development in the Growth Area should be cognisant of and take into account the fact that development on the Alpha House plot will be built out in accordance with the extant planning permission.	It is not considered necessary to include specific reference to the implementation of a planning permission on part of the site.
It is highly likely that a comprehensive masterplan of the entire Growth Area is undeliverable, and the Council should be concerned that regeneration of the area and the contribution the Growth Area is intended to make towards meeting the draft Local Plan's strategic objectives will not be delivered during the draft new plan period if piecemeal development proposals are resisted as a principle. Piecemeal redevelopment proposals should be considered an acceptable approach in-principle within the Growth Area and clearly stated as such within draft Allocation C2.	Comprehensive and coordinated development is a key objective for these sites. It is considered that piecemeal development will fail to optimise the delivery of the site's potential and its contribution to meeting the borough's identified needs.
Regis Road is intended to be the only access route to the new Big Yellow store, so draft Allocation C2 should account for this by making it clear that vehicular and pedestrian access to the store via Regis Road is always maintained.	We will propose a modification to address this.
Background information. Representations relate to the Howden's site. Welcome the positive tone of the draft document, and the emphasis placed on supporting the creation of healthy and sustainable places in Camden, and in particular, in the Kentish Town area. Support the key aims and stated strategic objectives.	Support welcomed.
Support the allocated uses. It is noted that the Regis Road Area Guidance considers other uses may be appropriate in this location, to enable the coexistence of large commercial uses, including creative uses such as the Camden Film Quarter, light industrial, and last mile delivery centres, with new homes, neighbouring residents and visitors, and a new public park.	Support welcomed. The allocation refers to light industry and the creative and knowledge sectors in criterion 6.
Hotel uses would be appropriate in this location. In addition, it is important that other residential types are encouraged, alongside self-contained homes.	This site is not considered appropriate for a hotel due to its location outside of the town centre. Policy C2 reflects that self-contained housing is the priority use of the plan. The Plan's Housing policies in Chapter 7 set out the Council's approach to the provision of other types of housing and will apply to any development on the site.
Support the development and design led principles in the draft Site Allocation. Support the ambition to reprovide housing and deliver new housing. In terms of meeting housing need, it is important that other residential types are encouraged, alongside self-contained homes.	Policy C2 reflects that self-continued housing is the priority use of the plan. The Plan's Housing policies in Chapter 7 set out the Council's approach to the provision of other types of housing and will apply to any development on the site.
Support the ambition to improve connections to, and within the site, providing safe and attractive pedestrian and cycle routes, and the ambitions for biodiversity enhancements.	Support welcomed.
Welcome the conclusion of the Camden Building Height Study and agrees with the identification of this site as a location where tall buildings may be an appropriate form of development. agreed that additional height above the proposed range is likely to be possible in some locations on this site, however this will be determined by appropriate testing of local and strategic views.	Support welcomed. Any application would be assessed against Policy D2 (Tall Buildings) and other relevant plan policies.
Overall, the contributions towards infrastructure including public transport, pedestrian and cycling links, are supported, providing that they are subject to assessment of feasibility, viability and demand.	Comment noted.
Notes changes to the local and planning policy context affecting the area in terms of ownership, updates to the NPPF and PPG, the adoption of the Regis Road Area Guidance SPD as an addendum to the Kentish Town Planning Framework.	Comment noted.

Main Issues	Councils Response
Amend capacity to read - A minimum of 1000 self contained homes, including self contained homes The draft policy implies a cap of 1,000 additional homes, which is unnecessarily and unreasonably restrictive and undermines the Government's clear agenda to "build more homes". There is an inconsistency between draft Policy C2 and the recently adopted Regis Road SPD, insofar as the 1,000 net additional homes target in the SPD relates to the Regis Road Growth Area (which excludes Holmes Road depot). The site capacity within Policy C2 should be increased to reflect its larger site area with the inclusion of the depot, which is itself a large site.	As noted in Local Plan paragraph 1.36, capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.
Given the complexity of the land ownership of the Regis Road area, request additional wording should be included to acknowledge that comprehensive development for the area may come forward in phases.	Criteria 22 of the policy allows for this and states that a phasing plan will be required at the planning application stage to demonstrate how the delivery of the site will be taken forward.
Overall, support the broad principles of the draft policies relating to the future development of Regis Road. However, it is critical that the policies do not undermine the objectives for the area by being unduly prescriptive in the absence of robust evidence.	Comment noted.
Infrastructure requirements - Change 'must' to 'should'. The list of infrastructure requirements has no consideration or evidence that they are needed or indeed viable. The proposed infrastructure requirements should be supported by detailed capacity studies (to demonstrate that they are needed), triggers and funding mechanisms. In the absence of this, the wording should be softened as indicated.	The infrastructure requirements are considered appropriate and necessary to create a vibrant and sustainable neighbourhood integrated into the surrounding area.
Background information of Yoo Capital land ownership. Welcome the positive tone of the draft document, and the emphasis placed on supporting the creation of healthy and sustainable places in Camden, and in particular, in the Kentish Town area. Support the key aims of the Draft New Camden Local Plan and listed strategic objectives.	Support welcome
It is requested that the allocated uses reflect the potential for creative and knowledge industries to be delivered in this location	The allocated uses for the site refer to employment uses. Criterion 6 specifically refers to creative and knowledge sectors.
It is requested that policy allows for further increased housing capacity, where appropriate and justified in planning terms.	As noted in Local Plan paragraph 1.36, capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.
The principle of development proposals being progressed through a comprehensive masterplan process, informed by the Kentish Town Planning Framework and the Regis Road Area Guidance, is supported. Request the potential to contribute to creative and knowledge industries, alongside housing and other uses, is included within the policy wording.	The allocated uses for the site refer to employment uses. Criterion 6 specifically refers to creative and knowledge sectors.
It is agreed that the Recycling Centre and other Council services should be re provided, however, this should be subject to assessment of their need and possible re-provision in other locations.	Criterion 23 states that development must retain or re-provide the Regis Road Recycling Centre and other Council service provision, unless suitable compensatory sites are provided elsewhere that replace the existing service provision.
Support of the development and design led principles set out within the draft Site Allocation, the ambition to re provide and deliver new housing, the ambition to improve connections to, and within the site, providing safe and attractive pedestrian and cycle routes, and the ambitions for biodiversity enhancements across the site.	Support welcomed.
Welcome the conclusion of the Camden Building Height Study and agree with the identification of this site as a location where tall buildings may be an appropriate form of development. It is agreed that additional height above the proposed range is likely to be possible in some locations on this site, however this will be determined by appropriate testing of local and strategic views.	Support welcomed.

Main Issues	Councils Response
The wider contributions towards public transport, pedestrian and cycling links are supported, subject to assessment of feasibility and demand.	Comment noted
Support self contained homes within allocated uses	Support welcomed
The allocated uses also reflect the potential for a range of uses to be delivered within the listed police station, as indicated in the development and design principles	The allocated uses are considered to reflect the Council's priorities for this site
The need for re-provision should be suitably assessed and this assessment is included within the policy wording Suggested amended wording to part 23: "re-provision of the Recycling Centre must replace the maximum throughput achievable at the existing site, subject to assessment of current and future requirements." This would allow for any future requirements but also advancements in technology and behaviours.	The allocation policy is consistent with Policy CC3 (Circular economy and reduction of waste), the North London Waste Plan and London Plan policy SI9 Safeguarded waste sites.
Concerned that the height restrictions on Regis Road are worded so vaguely as to exercise no real restrictions. "Additional height, above the potential appropriate height range, may be possible in some locations on this site...". This leaves the height range essentially unlimited which cannot be acceptable.	The acceptability of any proposals for tall buildings on the site will be assessed against the criteria in Policy D2 (Tall Buildings), London Plan policy D9 on Tall Buildings and all other relevant policies.
Network Rail want discussions with Camden Council about this site to ensure that site to the North - Murphys - is not prejudiced.	Comment noted.

Site Allocation Policy C3 - Murphy Site

Number of representations: approx. 24

Representations received from:

- Residents
- GLA
- Network Rail
- Thames Water
- CPRE
- Folgate Estates
- Transition Kentish Town
- Transport for London
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
The site allocation should clearly set out in that funding for a feasibility study may be required for improvements to Gospel Oak station.	The policy seeks a financial contribution towards improvements at Gospel Oak station. No change of wording of wording is considered necessary.
The "Infrastructure Requirements" sections in each Site Allocation in "Chapter 4 - Central Camden" should reflect the above protection of views of Central London from Kenwood and Parliament Hill.	Relevant site allocations identify that the site is within a view identified in the London View Management Framework, including sites C2 C3, C15 and C23. Applications for tall buildings will be assessed against all relevant policies including Local Plan policy D2 on Tall Buildings; policy D1 on Achieving Design Excellence, which seeks to preserve protected strategic views; policy D5 on the Historic Environment, and London Plan Policy D9 on Tall Buildings. Protected strategic views are shown on the Local Plan Policies Map.
The Infrastructure Requirements for these site allocations should be amended to state that "Development must..." comply with Policies HC2, HC3 and HC4 of The London Plan (2021) and any other relevant laws, regulations and policies which protect views to Central London from damage by excessively tall, massive or unsightly and inappropriate developments.	The London Plan forms part of the statutory development plan for Camden and other London boroughs, as recognised in Local Plan paragraph 1.8 and Figure 01. Therefore, relevant London Plan policies are taken into account as necessary when planning applications in Camden are assessed. It is not therefore necessary to make specific reference to London Plan policies in the site allocations for particular sites.
These sites are not suitable for tall buildings.	The locations identified as potentially suitable for tall buildings in the Local Plan reflect the findings of the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.
Sewer Treatment Works catchment Beckton	We will propose a modification to update information.

Main Issues	Councils Response
Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Sewer treatment works RAG assessment 'orange' We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	
KTNF prefers medium density and the space available on the Murphy site should allow plans to approach this goal.	The housing capacities are indicative. A higher or lower number may be considered appropriate where this can be justified, as set out in paragraph 1.40.
There needs to be more consideration for pedestrians in routes through the site, particularly for disabled people and elderly, and especially with the rise in popularity of e-bikes and scooters.	Any proposal will be assessed against Policy T2 which priorities walking, wheeling and cycling.
The amount of accommodation on the site needs to be fixed. Previous plans have shown numbers as high as 2000 for the Regis Road and Murphy sites. We regard the 750 figure as a maximum, otherwise the buildings increase in size, or the accommodation units get smaller.	The housing capacities are indicative. A higher or lower number may be considered appropriate where this can be justified, as set out in paragraph 1.40.
KTNF has expressed concerns over the impact of the population increase on the surrounding transport network, and whether it can cope, or whether more services may be required. Further studies are required.	Criterion 21 expects any application for the site to fully assess transport implications and include a transport strategy. All relevant Local Plan transport policies will also apply.
There is no commitment to the provision of a specific breakdown of types of affordable housing accommodation.	Any application will be assessed against the Local Plan's policies on housing and affordable housing.
In terms of sustainability, how are materials from existing buildings going to be reused, how are materials to be sourced, how is carbon assessment to be applied?	In accordance with draft Local Plan Policy CC2, all schemes involving demolition (where this has been justified) have to be accompanied by a 'pre-demolition audit'. The audit would 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. 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).
28 "Explore the provision of temporary (meanwhile) uses on the site to maintain activity as a comprehensive scheme is progressed." Developers need incentives to provide the space as previous history shows they are often reluctant to do so. 'Meanwhile uses' should also be free to some community groups.	The policy seeks a meanwhile strategy to be submitted, which would explore this issue.
Murphy's yard should be planted with trees and foliage and make it an extension of the Heath, not padel courts. Do something for once for the environment. KEEP THE WHOLE AREA GREEN	Comment noted.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	Comment noted and we will propose a modification.
Background information on site ownership. Enclose previously submitted detailed representations made during earlier consultation stages, which remain applicable to the latest Draft Plan.	Comment noted
CIL should be more tacitly employed to benefit the site, to help ensure its success.	Comment noted.

Main Issues	Councils Response
If applied too strictly to existing industrial sites with low-intensity industrial or open storage use, such as Murphy's Yard, the requirement to increase, or at least maintain, industrial, storage and warehousing capacity could significantly impact future redevelopment and limit the amount of other land uses from coming forward. Concerned about how reprovision of industrial space is calculated in relation to open storage space. The site allocation / policy should not prescribe a minimum industrial quantum and a wider assessment of the site context, market, and character should be taken into account when determining a site's realistic operational capacity, guided by good place making and master planning principles.	The allocation recognises that site forms part of the designated Kentish Town Industry Area, which is considered to be a Locally Significant Industrial Site (LSIS) in terms of the London Plan, and is therefore informed by London Plan policy E7 on Industrial intensification, which allows for other uses in designated industrial areas where industrial use is intensified as part of a plan-led process.
Light industrial will be an appropriate form of industrial use to be re-provided on the Site given the context of the local area and placemaking aspirations of any future masterplan. This should be reflected in the policy wording and above allocated uses.	Industry / employment is included as allocated uses. This includes light industry which is specifically mentioned in criterion 7.
The aspiration for increased connectivity across the Site and to/from neighbouring Sites is fully supported. it must be recognised that the land required to deliver the 'Heath line' is not entirely within Folgate Estates' ownership and the ability to deliver such a structure will rely on the outcomes of discussions with third parties and detailed feasibility and cannot be guaranteed. Network Rail must be able to access and maintain their operational land. Delivery of site should not be tied or subject to land outside of Folgate Estates ownership. It is suggested that the policy is amended to encourage exploring the feasibility of such connections as opposed to an absolute requirement.	Supported welcomed. The provision of a new green corridor linking Kentish Town Road and Hampstead Heath to form the key pedestrian priority route through the site is a key Council aspiration for the site, as set out in the Kentish Town Planning Framework. We note that the land is not entirely within Folgate Estates' ownership.
Support the ambitions to provide wider infrastructure improvement, but this needs to be balanced with and subject to deliverability and viability considerations. The prevailing CIL rates are exceptionally high in this location (and in comparison to other large-scale allocations) and discourage housing delivery. It is requested this is acknowledged in the Site Allocation 'Other Considerations' for the avoidance of doubt.	Comment noted. It is not considered necessary or appropriate to refer to prevailing CIL rates. The level of contributions to wider infrastructure improvements will be assessed at the planning application stage.
Welcome the inclusion the full text with regards to the approach to building heights. Notwithstanding, a design-led approach should be taken to establish the most appropriate building heights for development sites in accordance with the London Plan. Policy should also take into account of optimal land use and wider local plan objectives such as housing targets, rather than being prescriptively applied.	The acceptability of particular tall building proposals will be assessed against the site allocation, Policy D2 (Tall buildings) and other relevant plan policies.
Any future masterplan will need to balance various priorities and pressures to deliver a significant quantum of development. Policies must remain balanced in order to facilitate long-term delivery at the Site with sufficient flexibility to enable detailed consideration at the application stage.	Comment noted.
Allocated uses should be broader to allow development coming forward to respond to evolving markets. This should include offices, life sciences, leisure (including cinema) and hotel uses. The flexibility for a greater variety of commercial uses would have significant placemaking and masterplan benefits. Recognise that such an offer should not compete with the town centre.	The allocated uses set out the Council's priorities for this site. It promotes a mixed use development that intensifies industrial and other employment uses. The allocated uses include offices, and creative and knowledge uses are referred to in criterion 7. The site is not considered appropriate for leisure, cinema or hotel uses as it is not within an identified town centre.
Inclusion of student housing is welcomed. Murphy's Yard has the opportunity to deliver a significant quantum of residential uses on Site to help achieve local housing need. However, policy needs to recognise the current challenges facing the housing market and provide sufficient flexibility to prevent hindering deliverability through supporting a wider mix of uses and housing tenures. Greater flexibility will help achieve the local housing need and provide flexibility to ensure a viable scheme can be delivered.	Support for inclusion of student accommodation noted. Self contained residential is the priority use of the Plan. The allocation therefore sets out our preferred approach for this site to help meet identified needs for self contained homes. The mix of housing in any development scheme would be assessed against the relevant Housing policies in the Local Plan.
As part owners of the site, Network Rail are supportive of the redevelopment and overall vision for the site.	Comment noted.

Main Issues	Councils Response
Network Rail reserves its position in regard to any future development on site being subject to operational sensitivities and that we will continue to have unrestricted rights of access across the site in order to gain access to the railway. Network rail support the representation submitted from Folgate Estates. (majority freeholders).	
The site allocation needs to be clearer in terms of the amount of industrial space that is envisaged at this site.	The policy sets out the Council's overall development principles for the site. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Local Plan and the London Plan.
Any development on this site should ensure that there is no adverse impact on the openness of Hampstead Heath, and the views from it, including from Parliament Hill.	Comment noted. Other plan policies cover strategic views (D1) and preserve and enhance Hampstead Heath (NE1).

Site Allocation Policy C4 - Kentish Town Police Station

Number of representations: approx. 9

Representations received from:

- Kentish Town Neighbourhood Forum
- YC CFQ Ltd
- Thames Water
- Metropolitan Police Service

Main Issues	Councils Response
Object to Part 4 which relates to the Section House building and the requirement to re-use for student accommodation purposes. The building is likely to be required to be retained in police use and this requirement could compromise the delivery of updated and modernised policing facilities. Site allocation C4 should be re-worded as follows: “Development must... (4) seek to retain the Section House building in accordance with Policy CC2 (Retention of Existing Buildings). The building is not currently proposed for a use other than policing, but in the event that it does become surplus to policing requirements, proposals should consider and re-use to provide student accommodation”. Where student housing is proposed this should be in accordance with Police H9 (Purpose-built Student Accommodation);	The allocation seeks to provide for continued police facilities on site either alone or as part of a mixed-use development. The wording could therefore be amended to clarify that the reuse of the building would be subject to no longer being required for police facilities.
Object to the requirement to seek to provide a route for pedestrian and cycle link between Holmes Road and Regis Road as it does not allow sufficient flexibility to ensure that it does not act as a block to development. Previous initiatives to develop the site were not deliverable due to the complexities of trying to deliver this route. Site allocation C4 should be re-worded as follows: “Development must... (7) as far as reasonably possible without compromising policing functions required by the site, seek to provide a safe and attractive walking, wheeling and cycling route between Holmes Road and Regis Road to improve connections with surrounding communities”. It is currently envisaged that this would be delivered across the yard area to the west of the site, given policing functions would be focussed on the east / Section House side of the site.	The adopted Supplementary Planning Guidance for the Regis Road Area states that improvements to pedestrian / cycle connectivity southwards is a key objective for this site, as part of the development of the wider area. Given this, the requirement to seek a new walking, wheeling and cycling route is justified.
KTNF is concerned that if the Recycling Centre is moved to part of this site, it could compromise requirements. KTNF has said the Recycling Centre should be expanded in line with circular economy principles and creation of more green jobs.	The allocation is clear that the introduction of any other uses should not compromise police operational requirements.
Policy C4 4 KTNF thinks there is too much student accommodation already outlined in the Local Plan.	Policy H9 (Purpose Built Student Accommodation) sets out an overall student housing target for Camden, in accordance with the London Plan, and the Local Plan identifies sites to contribute to this need. Scheme

Main Issues	Councils Response
	including the provision of student housing will be assessed against policy H9.
KTNF does not support the Police Station or its Car Park being used as a location for the Recycling Centre. Wherever the Recycling Centre is located, KTNF strongly requests that there is no vehicular access from Holmes Road. Vehicular access from Regis Road would be far safer and more suitable.	The draft Local Plan does not indicate a preferred location for the recycling centre. This will be determined as part of the planning application process. Policy C4 states that development must be designed to ensure that the main vehicular entrance to the site is from Regis Road.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
Would welcome the inclusion of the site as an appropriate location for the replacement recycling centre, as alternative locations continue to be explored.	Site Allocation Policy C2 Regis Rd and Holmes Rd depot provides for the retention or reprovision of the Regis Road Recycling Centre. The draft Local Plan does not indicate a preferred location for the recycling centre either within or outside of Regis Road. This would need to be determined as part of any detailed proposals.
Support the development and design led principles set out. In respect of 4, student accommodation, it is understood that this would only be considered where the Section House does not remain in its existing use as a police station.	Support welcomed.
Amend capacity to up to 35 additional homes subject to testing and potential benefits of accommodating the recycling centre as a mixed use approach.	The indicative housing capacity is based on site capacity assessment work, consistent with the approach taken on other allocated sites. As noted in Local Plan paragraph 1.36, capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

Site Allocation Policy C5 - 369-377 Kentish Town Road

Number of representations: approx. 4

Representations received from:

- Thames Water
- Network Rail
- Transport for London
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
Part 6 - Recommend the following edits for clarity: 'contribute towards the relocation <u>and enhancement</u> of the bus shelter, <u>in collaboration with Transport for London</u> , to improve passenger and pedestrian safety, consistent with aspirations for a new Kentish Town Square. <u>Any relocated bus shelter should include real time passenger information.</u> '	The additional detail suggested is not considered necessary.
ALLOCATION C5 (KT5): 369 – 377 Kentish Town Road General point: KTNF requested a clear route with a new ramp to be built alongside the railway lines. The ramp provides both the physical and visual entrance to the entire scheme.	Comment noted.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
Network Rail support the consultation response from Folgate Estates to this site allocation.	Comment noted.

Site Allocation Policy C6 - Kentish Town Fire Station

Number of representations: approx. 3

Representations received from:

- Thames Water
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
Policy C6 1 The Plan needs to specify what is meant by “alternative community use”. KTNF prefers affordable housing over and above student accommodation.	This will only apply should the existing fire station be declared surplus to the operational needs of the London Fire Brigade, and any alternative use will be determined if that point. The reference to alternative community use is consistent with Local Plan Policy SC3 (social and community infrastructure).
6. “Retain existing trees and provide suitable new planting and landscaping.” KTNF requests that the existing planters which have been created through community effort over the last six years, be retained.	Comment noted.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Site Allocation Policy C7 - Morrisons Supermarket

Number of representations: approx. 8

Representations received from:

- St George West London
- Thames Water
- Transport for London
- Eton Conservation Area Advisory Committee

Main Issues	Councils Response
Our comments made in response to the Regulation 18 consultation remain valid. Part 13 - We do not support permanent off-site bus standing facilities due to the increased operational costs that will be difficult to recover in the Long-term, we therefore recommend the following modifications to the policy: 'including the practicality of alternative locations outside the site. <u>Permanent bus standing facilities should be provided on-site, and any off-site provision should be temporary and for the duration of the works. Details of bus standing facilities are subject to agreement with TfL.</u> Furthermore, the policy should state ' <u>Development must contribute to any additional costs associated with rerouting of additional bus services to serve the development or alternative bus standing locations.</u> '	Part 13 does not require off-site standing facilities. The wording is considered appropriately flexible for a solution to be agreed with all relevant stakeholders.
Sewer Treatment Works catchment Beckton. This site has planning approval so we have not undertaken any further assessment. If the proposal changes we will need to reassess. Noting the respondent is the developer for C7 Camden Goods Yard site and is currently at Phase 1. St George's redevelopment proposals for the Site provide an excellent opportunity to assist the Council with significant housing delivery and employment growth and regeneration as well as addressing some of the key issues that it is facing across the borough.	Comment noted and we will propose a modification.
Site Allocation C7 – Morrisons Supermarket • Inconsistent approach to Site allocation C7, imposing requirements inconsistent with Policy H1, H4, the London Plan and NPPF. • No justification for requirement “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’. Prejudicing viability tested route conflicting with NPPF. • Concern that pre-app discussions may have indirectly	The context section of the site allocation sets out background information. The wording does not 'require' but indicates an expectation, in line with our objective of meeting our overall housing targets. The plan should be read as a whole, which will include consideration of Policy H1 and H4.

Main Issues	Councils Response
affected the Site Allocation wording. Wording is not included in any other Site Allocation?	
Site Allocation C7 – Morrisons Supermarket • Noting the development and design principles (Building Heights Study, appropriate tall buildings 12 - 53m), and that the Council has granted permission for a development up to 56m. • It is not effective to seek heights of 12 - 53m, derived from a borough wide assessment that are below the height of an approved scheme. • The remainder of the Site Allocation and plan seek to secure benefits, adding further constraints to development. • C7 should be revised to remove text related to maintaining or increasing housing and affordable housing. • The appropriate height should be revised to 56m	The planning application was considered on its merits, prior to the publication of the Building Heights Study. Given this, the policy recognises the approved building height, whilst allowing for any future application to be judged on its merits against the Building Height Study findings and Policy D2 (Tall Buildings).
Camden Goods Yard Planning Framework Supplementary Planning Document (SPD) • Development at the site should have regard to the SPD, which is nearly 10 old. • The SPD was produced under a previous London Plan. • Limited weight should be given to the SPD • The draft Local Plan should draw out specifically which SPD visions and objectives should be regarded, or the SPD should be formally updated, or the reference should be deleted.	The Council does not consider the Camden Goods Yard SPD to be out of date. Given this it is still considered to be a material consideration in decision making. It is therefore considered reasonable for the Local Plan to make reference to it. No change to wording is therefore considered necessary.
Appendix 2 - Proposed amendments to Allocation C7 - Morrisons supermarket CLPRPSD Allocated Use: Permanent self-contained homes, employment (offices and maker spaces), retail, food and drink, community and leisure use Proposed Allocated Use: Housing (including housing proposed by H1, H4, H8, H9, H10); main town centre uses (as defined by Framework glossary33) CLPRPSD 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 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. CLPRPSD Development must: 8. remove reduce existing car parking in line with this Plan's car-free approach 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. CLPRPSD 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).	The wording of Site Allocation Policy C7 is considered to be appropriate. No change is therefore considered necessary.

Main Issues	Councils Response
These four sites make up the bulk of the proposed redevelopment of Camden Goods Yard. This redevelopment is already underway and planning permission has been granted for all but one of the sites. In our comments on the 2024 Draft Plan we expressed concern that the tall blocks currently under construction have a significant impact on views in and around adjacent conservation areas, on Primrose Hill open space, and have a harmful impact on the iconic and historic Roundhouse which is now lost in views from Haverstock Hill. We asked that “Controls over the height of new development should be spelt out in the Development and Design Principles having regard to the impact of development on surrounding conservation areas and in particular the important local historic views from Haverstock Hill towards the Roundhouse, City of London and St Paul’s.” In the revised 2025 Draft Plan Officers have acknowledged the point we made by including a reference which gives regard to the Vision and Objectives set out in the CGY Framework.’ ... ‘Heritage was a key consideration in identifying areas of search for tall buildings in Camden and formed part of the assessment criteria to guide decisions on the appropriateness of tall buildings within an area.’ Regrettably the local historic views are already compromised by the tall blocks now built on the Morrisons Supermarket site (C7): we fear the same will be the case on the other three sites which is disappointing.	Comments noted. Policy D2 sets out the Council's approach to tall buildings and applications for tall buildings will be considered against the provisions in this policy.

Site Allocation Policy C8 - Former Morrisons Petrol Filling Station

Number of representations: approx. 4

Representations received from:

- Thames Water
- St George West London
- Eton Conservation Area Advisory Committee

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton. In order to make an assessment we require information on the proposed scale of development.	Planning permission has been granted on this site. Modification proposed.
Site Allocation C8 – Former Morrisons Supermarket PFS • C8 is allocated for ‘Permanent self-contained homes; employment (offices), retail, food and drink’. • The Site allocation should be revised to include all living [space] uses, including PBSA (H9) and housing with shared facilities (H10).	The Local Plan is clear that the Council regards permanent self contained housing to be the priority land-use of the Local Plan and the allocated use reflects this.
Appendix 3 - Proposed amendments to Allocation C8 - Former Morrisons petrol filling station CLPRPSD Allocated Use: Permanent self-contained homes; employment (offices), retail, food and drink Proposed Allocated Use: Housing (including housing proposed by H1, H4, H8, H9, H10); main town centre uses (as defined by Framework glossary³⁴) CLPRPSD 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). CLPRPSD 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. 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	The wording of Site Allocation Policy C8 is considered to be appropriate. No change is therefore considered necessary.

Main Issues	Councils Response
is co-ordinated with proposals for 100 Chalk Farm Road. The residential capacity will be assessed at that stage. CLPRPSD 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).	
These four sites make up the bulk of the proposed redevelopment of Camden Goods Yard. This redevelopment is already underway and planning permission has been granted for all but one of the sites. In our comments on the 2024 Draft Plan we expressed concern that the tall blocks currently under construction have a significant impact on views in and around adjacent conservation areas, on Primrose Hill open space, and have a harmful impact on the iconic and historic Roundhouse which is now lost in views from Haverstock Hill. We asked that “Controls over the height of new development should be spelt out in the Development and Design Principles having regard to the impact of development on surrounding conservation areas and in particular the important local historic views from Haverstock Hill towards the Roundhouse, City of London and St Paul’s.” In the revised 2025 Draft Plan Officers have acknowledged the point we made by including a reference which gives regard to the Vision and Objectives set out in the CGY Framework.’ ... ‘Heritage was a key consideration in identifying areas of search for tall buildings in Camden and formed part of the assessment criteria to guide decisions on the appropriateness of tall buildings within an area.’ Regrettably the local historic views are already compromised by the tall blocks now built on the Morrisons Supermarket site (C7): we fear the same will be the case on the other three sites which is disappointing.	Comments noted. Policy D2 sets out the Council's approach to tall buildings and applications for tall buildings will be considered against the provisions in this policy.

Site Allocation Policy C9 - 100 Chalk Farm Road

Number of representations: approx. 2

Representations received from:

- Thames Water
- Eton Conservation Area Advisory Committee

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton. This site has planning approval so we have not undertaken any further assessment. If the proposal changes we will need to reassess.	Planning permission has been granted on this site. Modification proposed.
These four sites make up the bulk of the proposed redevelopment of Camden Goods Yard. This redevelopment is already underway and planning permission has been granted for all but one of the sites. In our comments on the 2024 Draft Plan we expressed concern that the tall blocks currently under construction have a significant impact on views in and around adjacent conservation areas, on Primrose Hill open space, and have a harmful impact on the iconic and historic Roundhouse which is now lost in views from Haverstock Hill. We asked that “Controls over the height of new development should be spelt out in the Development and Design Principles having regard to the impact of development on surrounding conservation areas and in particular the important local historic views from Haverstock Hill towards the Roundhouse, City of London and St Paul’s.” In the revised 2025 Draft Plan Officers have acknowledged the point we made by including a reference which gives regard to the Vision and Objectives set out in the CGY	Comments noted. Policy D2 sets out the Council's approach to tall buildings and applications for tall buildings will be considered against the provisions in this policy.

Framework.’ ... ‘Heritage was a key consideration in identifying areas of search for tall buildings in Camden and formed part of the assessment criteria to guide decisions on the appropriateness of tall buildings within an area.’ Regrettably the local historic views are already compromised by the tall blocks now built on the Morrisons Supermarket site (C7): we fear the same will be the case on the other three sites which is disappointing.	
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Site Allocation Policy C10 - Juniper Crescent

Number of representations: approx. 7

Representations received from:

- Historic England
- Riverside and Country Partnerships
- Thames Water
- Transport for London
- Eton Conservation Area Advisory Committee

Main Issues	Councils Response
We note that the part 11 of policy does require car parking to 'be designed to allow for repurposing when no longer required'. We recommend the policy is modified as follows for clarity: ' ...be designed to allow for repurposing when no longer required <u>existing residents move out or permits are given up</u> ; and'	The current wording is considered to be sufficiently clear. No change to the wording is considered necessary.
Support the inclusion of the allocation, welcome the increase in housing capacity and changes made to Part 3.	Support welcomed.
Suggest policy C10 criterion 11 is amended to ensure it reflects the specific needs of the site and to avoid conflict with Policy T5. As previously noted, due to the specific circumstances of this Site, recognition that residents parking will need to be provided is welcomed and was of fundamental importance to them in their support for redevelopment. "Criterion 11: 'rationalise parking on site taking into account of in line with Policy T5 (parking and car free development).	Criterion 11 is considered to make appropriate reference to policy T5.
Suggest amendment to Policy C10 criteria 16 to ensure the effective delivery of the sites, and to ensure that each site is planned in a way to deliver its part of the link and will avoid the need for contributions. Criterion 16: 'contribute towards delivering demonstrate how proposals will help to deliver a route for pedestrians and cyclists to connect to Oval Road/Regent's Canal via Gilbey's Yard, with Juniper Crescent...' Criterion 17: 'contribute towards the delivery of demonstrate how proposals will help to deliver a new route for pedestrians and cyclists adjacent to the West Coast mainline railway that connects Regent's Park Road bridge with Regent's Canal towpath ('Stephenson's Walk), creating opportunities to reveal, restore and access heritage assets...'	The wording in criteria 16 and 17 is considered to be appropriate. Delivery of these routes is a key objective for the area and the Goods Yard Framework.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development.	Planning permission has been granted on this site. Modification proposed.
Welcome the strengthening of wording in both allocations in relation to Roundhouse. The specified height range from the Building Height Study is noted but feel the inclusion of 9m which is below the tall building definition on both the local plan and London plan is potentially confusing. Allocations should be clearer Suggested amended wording 'The acceptability of particular tall building proposals, and their location within the site, will <u>need to take appropriate account of and respect the significance of the Roundhouse</u> and should be located accordingly. They will be assessed	The text reflects the findings of the Camden Building Heights Study. Applications for tall buildings will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies, which would include the points in the allocation which refer to the importance of the Roundhouse and Policy D5 (Historic environment) as well as other relevant policies. Therefore additional text is not considered necessary.

against Policy D2 (Tall Buildings) and other relevant development plan policies.	
These four sites make up the bulk of the proposed redevelopment of Camden Goods Yard. This redevelopment is already underway and planning permission has been granted for all but one of the sites. In our comments on the 2024 Draft Plan we expressed concern that the tall blocks currently under construction have a significant impact on views in and around adjacent conservation areas, on Primrose Hill open space, and have a harmful impact on the iconic and historic Roundhouse which is now lost in views from Haverstock Hill. We asked that “Controls over the height of new development should be spelt out in the Development and Design Principles having regard to the impact of development on surrounding conservation areas and in particular the important local historic views from Haverstock Hill towards the Roundhouse, City of London and St Paul’s.” In the revised 2025 Draft Plan Officers have acknowledged the point we made by including a reference which gives regard to the Vision and Objectives set out in the CGY Framework.’ ... ‘Heritage was a key consideration in identifying areas of search for tall buildings in Camden and formed part of the assessment criteria to guide decisions on the appropriateness of tall buildings within an area.’ Regrettably the local historic views are already compromised by the tall blocks now built on the Morrisons Supermarket site (C7): we fear the same will be the case on the other three sites which is disappointing.	Comments noted. Policy D2 sets out the Council's approach to tall buildings and applications for tall buildings will be considered against the provisions in this policy.

Site Allocation Policy C11 - Network Rail land at Juniper Crescent Site Allocation Policy C10 - Juniper Crescent

Number of representations: approx. 3

Representations received from:

- Network Rail
- Transport for London
- Thames Water

Main Issues	Councils Response
We suggest the following edits to part 8 of the policy: 'An operational area within the site could, for example, support a bus turning area at the end of the existing access road <u>in conjunction with the reprovision of stand Spaces for five buses with independent bus movements, new bus stops for resident access, and TfL-specified welfare facilities for bus drivers.</u> '	The additional detail suggested is not considered necessary.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
Welcome the flexibility in the policy wording to either allow continued operational railway use or a future redevelopment of the site , until the long-term plans for the site become clearer.	Support welcomed.

Site Allocation Policy C12 - Gilbeys Yard

Number of representations: approx. 6

Representations received from:

- Thames Water
- Transport for London
- National Grid
- Riverside and Country Partnerships

Main Issues	Councils Response
Part 9 of the policy should be modified to state, 'rationalise parking on-site in Line with Policy T5 (Parking and Car Free Development), <u>be designed to allow for repurposing when existing residents move out or permits are given up</u> and reduce vehicular dominance;' to ensure the development complies with London Plan car parking standards in future.	The current wording is considered to be sufficiently clear. No change to the wording is considered necessary.
It's recommended that the following minor changes are made to Policy C12 to provide clarity and ensure that the site optimises housing delivery.	Comment noted.
Suggest Policy C12 criterion 9 is amended to ensure it reflects the specific needs of the site and to avoid conflict with Policy T5. As previously noted, due to the specific circumstances of this Site, recognition that residents parking will need to be provided is welcomed and was of fundamental importance to them in their support for redevelopment. "Criterion 9: 'rationalise parking on site taking into account of in line with Policy T5 (parking and car free development).'	Criterion 9 is considered to make appropriate reference to policy T5.
Suggest amendment to Policy C12 criteria 14 to ensure the effective delivery of the sites, and to ensure that each site is planned in a way to deliver its part of the link and will avoid the need for contributions. Criterion 14: 'contribute towards the delivery of demonstrate how proposals will help to deliver a new route'	The wording in criterion 14 is considered to be appropriate. Delivery of these routes is a key objective for the area and the Goods Yard Framework.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development.	Comment noted. Modification proposed.
One or more proposed development sites are crossed or in close proximity to NGET assets. Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective. We propose modifications to each of the above site allocation policies to include wording to the following effect. "The development will include a strategy for responding to the NGET underground Cable Route present within/adjacent to the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design". We therefore object to the document until wording to this effect is included.	We will propose a modification to address this.

Site Allocation Policy C13 - West Kentish Town Estate

Number of representations: approx. 6

Representations received from:

- Resident
- Transport for London
- Woodland Trust
- Thames Water

Main Issues	Councils Response
We welcome the addition of part 8 of the policy, however it should be modified to state, 'where existing residents parking is reprovided, this should be located to minimised car movements within the site , and be designed to allow for repurposing when no longer required <u>existing residents move out or permits are given up.</u> '	Support welcome. The current wording is considered to be sufficiently clear. No change to the wording is considered necessary.
The "Infrastructure Requirements" sections in each Site Allocation in "Chapter 4 - Central Camden" should reflect the above protection of views of Central London from Kenwood and Parliament Hill.	Relevant site allocations identify that the site is within a view identified in the London View Management Framework, including sites C2 C3, C15 and C23. Applications for tall buildings will be assessed against all relevant policies including Local Plan policy D2 on Tall Buildings; policy D1 on Achieving Design Excellence,

Main Issues	Councils Response
	which seeks to preserve protected strategic views; policy D5 on the Historic Environment, and London Plan Policy D9 on Tall Buildings. Protected strategic views are shown on the Local Plan Policies Map.
The Infrastructure Requirements for these site allocations should be amended to state that “Development must...” comply with Policies HC2, HC3 and HC4 of The London Plan (2021) and any other relevant laws, regulations and policies which protect views to Central London from damage by excessively tall, massive or unsightly and inappropriate developments.	The London Plan forms part of the statutory development plan for Camden and other London boroughs, as recognised in Local Plan paragraph 1.8 and Figure 01. Therefore, relevant London Plan policies are taken into account as necessary when planning applications in Camden are assessed. It is not therefore necessary to make specific reference to London Plan policies in the site allocations for particular sites.
These sites are not suitable for tall buildings.	The locations identified as potentially suitable for tall buildings in the Local Plan reflect the findings of the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	Comment noted and we will propose a modification.
At Reg 18 consultation, we asked for the addition of wording seeking to maximise the retention of existing trees and greenspace, integrating these into the estate design, in line with policies DS1 and NE3. We strongly welcome the addition of point 11 “seek to retain existing trees where possible	Support welcomed

Site Allocation Policy C14 – Hawkridge House

Number of representations: approx. 5

Representations received from:

- UCL
- Thames Water
- Belsize Conservation Area Advisory Committee

Main Issues	Councils Response
We welcome the addition of part 8 of the policy, however it should be modified to state, 'where existing residents parking is reprovided, this should be located to minimised car movements within the site, and be designed to allow for repurposing when no longer required <u>existing residents move out or permits are given up.</u> '	Support welcome. The current wording is considered to be sufficiently clear. No change to the wording is considered necessary.
Site allocations C14 Other considerations: Add “consideration should be taken of height in relation to views from adjacent conservation areas, eg Parkhill and Upper Park”.	The impact on the conservation area would be taken into account through consideration against Local Plan Policy D5 – Heritage. Additional text in CC14 is not considered necessary.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
• The same comments made under the Regulation 18 consultation in relation to Draft Site Allocation C18 (109 Camden Road, also known as Ifor Evans),	These comments were addressed and the responses can be viewed in the Consultation Statement.
• Following previous representations, UCL notes that Hawkridge House (Draft allocation C14) has now been allocated to promote additional student accommodation which is welcomed.	Support welcomed
• Finally, UCL welcomes the amended reference to how indicative housing capacities carry flexibility on the potential development capacity for sites put forward, under draft supporting paragraphs 1.38 to 1.40, and this aligns with comments raised previously.	Support welcomed

Site Allocation Policy C15 – Wendling Estate and St Stephens Close

Number of representations: approx. 6

Representations received from:

- Resident
- Woodland Trust
- Transport for London
- Thames Water

Main Issues	Councils Response
The “Infrastructure Requirements” sections in each Site Allocation in “Chapter 4 - Central Camden” should reflect the above protection of views of Central London from Kenwood and Parliament Hill.	Relevant site allocations identify that the site is within a view identified in the London View Management Framework, including sites C2 C3, C15 and C23. Applications for tall buildings will be assessed against all relevant policies including Local Plan policy D2 on Tall Buildings; policy D1 on Achieving Design Excellence, which seeks to preserve protected strategic views; policy D5 on the Historic Environment, and London Plan Policy D9 on Tall Buildings. Protected strategic views are shown on the Local Plan Policies Map.
The Infrastructure Requirements for these site allocations should be amended to state that “Development must...” comply with Policies HC2, HC3 and HC4 of The London Plan (2021) and any other relevant laws, regulations and policies which protect views to Central London from damage by excessively tall, massive or unsightly and inappropriate developments.	The London Plan forms part of the statutory development plan for Camden and other London boroughs, as recognised in Local Plan paragraph 1.8 and Figure 01. Therefore, relevant London Plan policies are taken into account as necessary when planning applications in Camden are assessed. It is not therefore necessary to make specific reference to London Plan policies in the site allocations for particular sites.
These sites are not suitable for tall buildings	The locations identified as potentially suitable for tall buildings in the Local Plan reflect the findings of the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	Comment noted and we will propose a modification.
At Reg 18 consultation, we asked for the addition of wording to better reflect the Community Vision for a healthier, greener, more sustainable, and more accessible neighbourhood, and to maximise the retention of existing trees and greenspace, integrating these into the estate design, in line with policies DS1 and NE3. We strongly welcome the addition of point 9 “seek to retain existing trees where possible.”	Support welcomed
We welcome the addition of part 6 of the policy, however it should be modified to state, 'where existing residents parking is reprovided, this should be located to minimised car movements within the site, and be designed to allow for repurposing when no longer required <u>existing residents</u> move out or permits are given up.'	We welcome the addition of part 8 of the policy, however it should be modified to state, 'where existing residents parking is reprovided, this should be located to minimised car movements within the site, and be designed to allow for repurposing when no longer required <u>existing residents</u> move out or permits are given up.'

Site Allocation Policy C16 – Shirley House

Number of representations: approx. 6

Representations received from:

- National Grid
- Thames Water
- Canal and River Trust
- Kilburn and District Properties

Main Issues	Councils Response
Site Allocation Shirley House, pleased to note the reference to moorings (“Development must: 6. consider the provision of infrastructure for canal moorings alongside the site.”) the Trust would require an Operating Proposal be submitted by any developer seeking to implement this, to	Support welcomed. No wording change is considered necessary. This would be dealt with at the planning application stage.

Main Issues	Councils Response
assess the plans and review navigational safety and sight lines.	
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development.	Comment noted. Modification proposed.
Background information. The site is also known as Camden Point. It was previously occupied by the British Transport Police until December 2024 when they vacated the site.	We will proposed modifications to address this.
Strongly support the overall aspirations of the Site Allocation and the principle of PBSA on the Site as an alternative to offices. A student-led scheme for the site is being explored, which includes the retention and extension of the existing building. These proposals closely align with the aspirations of the draft Site Allocation and have been presented to officers in recent pre-application discussions. On this basis, we do not seek any substantive changes to the description of the Site Allocation beyond noting the Site is currently vacant since British Transport Police relocated to new premises in December 2024.	Support welcomed
Considered that there is scope for the site to deliver a minimum of 300 student beds. This is based on the retention and extension of the existing building and would further contribute towards Camden's needs over the lifetime of the new Local Plan.	The indicative capacity is based on a design assessment of the site, consistent with Local Plan policies and using a standard approach. As noted in Local Plan paragraph 1.36, capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.
Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective. We propose modifications to each of the above site allocation policies to include wording to the following effect. "The development will include a strategy for responding to the NGET underground Cable Route present within/adjacent to the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design". We therefore object to the document until wording to this effect is included.	We will propose a modification to address this.

Site Allocation Policy C17 – Camden Town over station development

Number of representations: approx. 19

Representations received from:

- Transport for London
- Places for London (Network Rail)
- Camden Mixed Developments
- Thames Water

Main Issues	Councils Response
Any development coming forward on this site should contribute towards the delivery of this scheme and development on this site may need to deliver works in kind for a new ticket hall and station box insofar as ensuring the full station upgrade can be delivered as and when funding is available. Any development on this site should additionally not preclude the delivery of the station capacity upgrade. Developments in the surrounding area should also provide a financial contribution towards the delivery of the station upgrade. While we acknowledge the desire to provide step-free access and capacity improvements to Kentish Town and	Comment noted.

Main Issues	Councils Response
Chalk Farm stations, we encourage the Council to prioritise Camden Town station for developer contributions.	
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
Background information. Firmly support the strategic objective of delivering a mixed-use development incorporating a new station entrance and ancillary supporting facilities for the station. Support the key aims and stated strategic objectives of the Draft New Camden Local Plan.	Support welcomed.
It is requested that the allocation allows for flexibility in residential uses (self-contained homes, student accommodation and co-living), alongside the range of employment uses (including maker spaces, creative industries and offices), with retail and food and drink, and hotel use. The allocation should ensure that it does not hinder appropriate and viable alternative uses coming forward.	Self-contained residential use is the priority use of the Plan. Hotel and co-living provision on this site would reduce its potential to contribute towards delivering self-contained homes to meet identified need.
Support the development and design led principles set out within the draft site allocation. Sufficient flexibility should be allowed for in policy to respond to market conditions and the needs of the local population. The range of uses set out should consider the comments made in relation to the allocated uses representation.	Support noted. The policy is considered to contained sufficient flexibility.
The Site is currently not identified as a location where a tall building may be appropriate. This overlooks the significant development potential inherent in an over-station scheme and may present unnecessary challenges to successful delivery. The site presents an opportunity for a well-designed landmark building that rises above the surrounding fabric, enhancing wayfinding and improving the legibility of the area. Therefore, the policy should acknowledge and accommodate the potential for a building exceeding 30 metres in height.	The policy reflects that the Camden Building Heights Study did not identify the site as having potential for a tall building. Any application for a tall building on this site would be assessed against the Local Plan Policy D2 –Tall Buildings and all other relevant policies.
The infrastructure requirement to deliver step-free access to Camden Town Station has the potential to stifle development coming forward. The wording of the requirement should be updated to require development to facilitate and contribute towards the delivery of step-free access. Such a large infrastructure requirement may not be necessary or proportionate to the scale of development	Step-free access is a key aspiration of the Council and the Mayor of London / TfL. Public transport should be accessible to all. It is considered reasonable and appropriate for the overstation development at Camden Town to incorporate step-free access to the station.
It is important that the allocated uses remain flexible and responsive to evolving market condition. The site allocation should enable a variety of employment opportunities and support a dynamic mix of uses that contribute to a thriving local economy.	Comment noted.
We welcome the draft site allocation which provides a clear expectation for the comprehensive redevelopment of the site to deliver a new station entrance linked to the existing station with over station development above. Camden Town Station capacity upgrade is a project of strategic importance to TfL to provide step-free access and address overcrowding and circulation. Over station enabling development is a key element to facilitate the delivery of the station upgrade projects by generating development value to unlock the project and also optimising the development potential of the site. The Council is encouraged to make full use of available/future funding sources, for example, Community Infrastructure Levy, S106 financial contributions in the nearby area.	Support welcomed. Comment noted.
Revision to the proposed Ref 19 site allocation boundary is supported.	Support welcomed.
Welcome the inclusion of student accommodation uses	Support welcomed.
Welcome that the site allocation policy is not overly prescriptive about the mix of land uses.	Comment noted
Station infrastructure should be added to the allocated land uses.	We will propose a modification to address this.

Main Issues	Councils Response
Suggest hotel should be considered as a potential land use, given the site location and characteristics. The site is located within a Major Town Centre location which Policy IE5 states is appropriate for medium sized hotel and visitor accommodation, has excellent access and would complement the balance of land uses and character of the area.	Self-contained residential use is the priority use of the Plan. Hotel provision on this site would reduce its potential to contribute towards delivering homes to meet identified need.
Welcome that site specific operational transport constraints and impact on established night time venues are referenced in site allocation development / design principles (points 5, 7 and 14).	Support welcomed.
Support the content and wording of design and place making principles set out in the site allocation. Strongly support the following text at point 14	Support welcomed
The site allocation seeks to ensure a transition in scale and building height across the site from the lower rise Stukeley Place towards Kentish Town Road. This is an appropriate and well-considered overall massing approach which is supported. Welcome the sensible and pragmatic approach in policy D2 on tall buildings. The development and design principles should acknowledge and incorporate the findings from page 195 of the Council's Building Heights Study (2024) which recognise that a larger / tall building on the site 'could help to make optimal use of the area and help deliver infrastructure and mixed use in a highly accessible location. It could also help with wayfinding to the new station entrance.' Should note that potential height and massing could play a key role in marking the location of the new station entrance, support wayfinding and legibility.	The additional text is not considered necessary.
Paragraph 15 should also refer to capacity improvements.	We will propose a modification to address this.
Support the new text which states that development must 'contribute towards improvement at Inverness Street Market.'	Support welcomed.

Site Allocation Policy C18 – UCL Campus, 109 Camden Road

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'orange' On the information provided modelling may be required to understand the impact of development.	Comment noted and we will propose a modification.

Site Allocation Policy C19 – Arlington Road former depot site

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Site Allocation Policy C20 – Highgate Centre, Highgate Road

No responses received

Site Allocation Policy C21 – Grand Union House, 18-20 Kentish Town Road

Number of representations: approx. 5

Representations received from:

- Camden Mixed Developments

Main Issues	Councils Response
Background information and planning history. Welcome the positive tone of the draft document, and the emphasis placed on supporting the creation of healthy and sustainable places in Camden, and in particular, in the Kentish Town area.	Comment noted.
The allocated uses are supported and should be maintained. It is requested that the allocated uses are broadened to support a wider range of employment generating uses as part of a mixed-use scheme, falling within Class E, and B8 land uses. The site's economic impact would be most keenly felt if a blend of employment uses and associated uses (such as storage / makers space / workshops) were permissible (and even actively encouraged) by the emerging allocation. Considerable amounts of office space in Camden Town is vacant. The Site has the potential to provide inner city / urban self-storage that could function as a potential 'enterprise hub' providing work and makers' space and ancillary support for small and local businesses while they establish and grow.	We will propose a modification to address this.
A range of bed-led uses would be appropriate, for example, hotels and student accommodation, in addition to self-contained homes. A hotel use would be entirely appropriate given the Site's highly accessible location within the town centre where small and medium scale visitor accommodation is consistent with the aims and objectives of emerging Local Plan Policy IE5. The Site is suitable for additional residential type uses, beyond self-contained homes, student accommodation particularly.	Permanent self-contained residential use is the priority use of the Plan. Hotel provision or student accommodation on this site would reduce its potential to contribute towards delivering permanent self-contained homes to meet identified need. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. The approach is consistent with Policy H1 (Maximising Housing Supply) which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.
Allocated uses should include student accommodation as well as self contained homes. Site is highly accessible and would alleviate pressure on local housing stock and would support identified need in Policy H9.	Permanent self-contained residential use is the priority use of the Plan. Student accommodation on this site would reduce its potential to contribute towards delivering permanent self-contained homes to meet identified need. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. The approach is consistent with Policy H1 (Maximising Housing Supply) which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing. Other site allocations include student accommodation to help meet need.
The Site Allocation should enable a variety of employment opportunities and support a dynamic mix of uses that contribute to a thriving local economy. It is acknowledged that self-contained residential is the priority use of the Local Plan. However, student accommodation would be in accordance with the housing policies of the Plan, help meet housing delivery targets and contribute towards creating mixed, inclusive and sustainable communities.	We will propose a modification to clarify the allocated employment uses. Student accommodation on this site would reduce its potential to contribute towards delivering permanent self-contained homes to meet identified need

Site Allocation Policy C22 – Heybridge Garages, Hadley Street

Number of representations: approx. 1

Representations received from:

- Belsize Conservation Area Advisory Committee

Main Issues	Councils Response
Site allocations C22 Other considerations: Add “consideration should be taken of height in relation to views from adjacent conservation areas, e.g. Parkhill and Upper Park”.	The impact on the conservation area would be taken into account through consideration against Local Plan Policy D5 – Heritage. Additional text in CC22 is not considered necessary.

Site Allocation Policy C23 – Former flats 121 – 129 Bacton, Haverstock Road

Number of representations: approx.7

Representations received from:

- Residents
- Mount Anvil
- EGOVRA

Main Issues	Councils Response
The “Infrastructure Requirements” sections in each Site Allocation in “Chapter 4 - Central Camden” should reflect the above protection of views of Central London from Kenwood and Parliament Hill.	Relevant site allocations identify that the site is within a view identified in the London View Management Framework, including sites C2 C3, C15 and C23. Applications for tall buildings will be assessed against all relevant policies including Local Plan policy D2 on Tall Buildings; policy D1 on Achieving Design Excellence, which seeks to preserve protected strategic views; policy D5 on the Historic Environment, and London Plan Policy D9 on Tall Buildings. Protected strategic views are shown on the Local Plan Policies Map.
The Infrastructure Requirements for these site allocations should be amended to state that “Development must...” comply with Policies HC2, HC3 and HC4 of The London Plan (2021) and any other relevant laws, regulations and policies which protect views to Central London from damage by excessively tall, massive or unsightly and inappropriate developments.	The London Plan forms part of the statutory development plan for Camden and other London boroughs, as recognised in Local Plan paragraph 1.8 and Figure 01. Therefore, relevant London Plan policies are taken into account as necessary when planning applications in Camden are assessed. It is not therefore necessary to make specific reference to London Plan policies in the site allocations for particular sites.
These sites are not suitable for tall buildings	The locations identified as potentially suitable for tall buildings in the Local Plan reflect the findings of the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.
There is effectively no site allocation policy for site C23 (Bacton Low Rise) as the developer (Camden) has abandoned the second (unbuilt part) of the scheme covered by the planning permissions listed in this draft plan. A site allocation policy for site C23 should be produced and consulted on. The site allocation policy for the site should include but not be restricted to: • Safeguarding the setting and the interior amenity of the Grade 1 listed St Martin’s Church. • Tall buildings on the site and include recommendation of the Camden Building Heights Study Final Report 4307_20240110_Camden Building Height Study Final Report Low res.pdf • The open railway cutting to the north of this site and effect of noise produced by fast trains both directly in balconies and indirectly by “bouncing” off adjacent buildings in nearby open spaces (e.g. Lismore Circus).	The site was included in Table 5 rather than as a detailed allocation as planning permission had been granted and earlier phases were under construction. Any future phases of the scheme subject to a further planning application would be considered against all relevant plan policies.
Preparing an application for the redevelopment of the site for residential development. As currently drafted and for the reasons set out in these representations, it is considered that the plan is not sound and that significant modifications are necessary.	See responses to detailed comments below.
Planning history of the site	Comment noted.
The housing capacity figure is incorrect. The remaining number of homes consented to be delivered in Phase 2 is 247.	The planning permission approved 314 homes in total. This included replacing 99 existing homes and therefore the total net gain approved was 215 new dwellings. Phase

Main Issues	Councils Response
Suggested amended wording: 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 67 466 new and replacement homes. <u>The Site has an extant planning permission to deliver the remaining 247 homes across Phase 2.</u> 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.”	1 delivered 67 homes in total. Therefore at least 247 homes need to be delivered in by the extant permission, which is a net gain of 148 new homes. Phase 2 may be subject to a further planning application. As noted in Local Plan paragraph 1.36, capacities are indicative. We will propose a modification for clarity.

Site Allocation Policy C24 – 52 - 54 Avenue Road

No responses received

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

No responses received

Site Allocation Policy C26 – 160 Malden Road

No responses received

Site Allocation Policy C27 – Land adjacent to Constable House, Adelaide Rd

Number of representations: approx. 527 including 4 resident petitions

Representations received from:

- London Gypsies and Travellers
- Residents
- Haverstock Ward Councillors
- New Eton Residents Association
- Adelaide Road Tenants Association
- Brocas Close Residents Association
- Eton Conservation Area Advisory Committee
- Gloucester Avenue Association

Main Issues	Councils Response
521 representations were received objecting to the allocation of this site to provide Gypsy and Traveller accommodation.	The Council has a statutory obligation to plan for the needs of Gypsies and Travellers and a duty to consider the housing needs of all our residents. The land adjacent to Constable House was considered to be suitable and available for allocation to help meet the accommodation needs of Gypsies and Travellers, following a detailed Gypsy and Traveller Site Identification Study and further assessment work. Further information on the approach taken in the Local Plan to help meet the accommodation needs of Gypsies and Travellers in Camden is set out in the Gypsy and Traveller Topic Paper.
5 representations were received in support of the site allocation.	Support welcomed
The most significant improvement is the allocation of two parcels of land suitable and deliverable for two Gypsy or Traveller sites in Camden. Feedback from Gypsy and Traveller residents of Camden support these allocations with the following comments: 1) Land east of Constable House, NW3 3QA This is a good size and the area is known to Travellers and even though it is overlooked by a residential block, that's not necessarily a problem if there is screening. It's quite exposed on the corner with Adelaide Road, unless all the green hedges stay in place. Overlooking is not a	Support welcomed. Our initial design led capacity work shows that the land adjacent to Constable House could potentially accommodate 2 pitches.

Main Issues	Councils Response
categorical problem. Rather, the problem depends on the immediate surroundings and the mitigations. Trees that grow upwards are good for privacy and screening but there are different kinds of trees. The ones with wide canopies and sparse branches that fall on caravan roofs in storms are not good. But the ones that grow upwards (like cypress) would be good. As it is more than 450 sq m, the site will accommodate three pitches to a very good standard.	

Chapter 5 – West Camden

Policy W1 – West Camden

Number of representations: approx. 9

Representations received from:

- Land Sec
- General Projects
- LB Barnet
- Transport for London

Main Issues	Councils Response
Part L Infrastructure, Part I - We welcome the modifications to highlight capacity improvements to the stations.	Support welcome.
Part L, 5 - We strongly welcome the additional priority for improving the interchange experience both between the three West Hampstead stations and in relation to the surrounding bus, pedestrian and cycle network.	Support welcome.
Draft policy W1 is also broadly supported including the infrastructure identified at part L.	Support welcomed.
Part D of the policy only refers to the O2 Centre site, while Part C has a wider site description. Suggested wording: "the site referred to in part (C) above The O2 centre site has the potential to become a vibrant and diverse new neighbourhood..." or include whole site name in Part D	We will propose a modification to address this point.
The same point needs to be picked up in descriptions of the Site in parts J, L(6) and L(7) of draft Policy W1, where there needs to be an accurate description of each of the component parts of the draft Site Allocation W2, including 14 Blackburn Road	We will propose modifications to address this point.
Reference should be made in Part L to directing Community Infrastructure Levy (CIL) receipts, towards some of the identified infrastructure priorities for the area.	It is not considered appropriate for the Local Plan to set out detail on how CIL will be spent. The Council's Infrastructure Funding Statement, which is updated annually, provides information on CIL funding priorities.
Draft Policy W1 part (L)(1) should be split out so that West Hampstead station and Finchley Road station are covered by separate bullet points. By including these as two separate parts, it is likely to be possible for Camden/TfL to secure additional funds from local developments. Suggested wording: i. Facilitation and contributions towards the delivery of new links / step free access into West Hampstead and Finchley Road Underground stations to improve access and capacity ii. <u>Facilitation and contributions towards the delivery of new links / step free access into Finchley Road Underground station to improve access and capacity</u>	It is considered that the proposed wording is not needed and results in unnecessary duplication
Part L. 5 should more specific about the key priorities for the area. Suggested wording : "improving the interchange experience both between the three West Hampstead stations <u>and delivery of a strong, convenient, direct, safe and accessible pedestrian and cycling east-west route linking Finchley Road with West End Lane and providing safe and attractive linkages to the surrounding communities</u> ".	This is covered by site allocation policy W2, criteria 15. No additional wording is therefore considered necessary in policy W1.
It would be beneficial for policy W1 (West Camden) to refer to working jointly with LB Barnet and LB Brent on the A5	The Council is committed to continuing to work with the LB Barnet and LB Brent on the A5 corridor. However, no

Main Issues	Councils Response
corridor to ensure consistent approaches to highway space allocation for bus priority and active travel and wayfinding.	change to wording of the Plan is considered necessary as this is a Transport matter.

Site Allocation Policy W2 - O2 Centre, carpark and car showroom sites and 14 Blackburn Road

Number of representations: approx. 20

Representations received from:

- Land Sec
- Transport for London
- Thames Water
- Belsize Conservation Advisory Committee

Main Issues	Councils Response
Part 16 - We welcome the requirement for development to be supported by a bus infrastructure plan to deliver improvements to bus stop facilities both with, and in the vicinity of, the site.	Support welcome.
Site allocation W2: include supermarket, book shop and doctors' surgery.	The allocated uses already include retail and a health centre, which encompass the uses referred to. It is not possible for planning policy to allocate particular types of retail uses.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary. Water network RAG assessment 'red' On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.	Comment noted and we will propose a modification.
Landsec support the representation submitted by the London Property Alliance's Camden Working Group, unless specifically noted.	Comment noted.
Background information about the planning permission and S73 application on the site.	Comment noted.
The town centre boundary the O2 Masterplan Site on Figures 14 and 15 is incorrect and should be updated. The identification of the O2 Masterplan Site as a "key area of development" on Figure 15 is supported and welcomed.	The figures are illustrative only. Designated town centre boundaries are shown on the Policies Map.
Fully support the inclusion of the Site within the draft Local Plan as draft Site Allocation W2. A bullet point should be added at the beginning of the Context section which states " <u>The redevelopment and regeneration of the O2 Masterplan area is a one-off and unique opportunity. Fully accessible, brownfield sites, of this size are extremely rare</u> "	The suggested wording is not considered necessary.
A new bullet point has been added about the extant planning permission and pending application at 14 Blackburn Road. Landsec strongly object as the extant planning permission and live/future application(s) at 14 Blackburn Road are a significant threat to delivery of comprehensive and coordinated development of the Site and the ability to achieve Development and Design Principles 3 and 4. Either remove the fourth bullet point or amend as follows: <u>Whilst</u> there is an extant planning permission for redevelopment at 14 Blackburn Road (PWX0202103) and a current application that proposes to amend the permitted scheme (2023/1145/P) <u>this has the potential to undermine the ability to achieve the maximum regeneration benefits including the optimum approach to placemaking across the site, the quantum of new homes and affordable homes, and the delivery or funding of the requisite community and transport infrastructure, as set out in this policy and the West End Lane to Finchley Road Supplementary Planning Document</u>	The text on 14 Blackburn Road is factually correct contextual information and is therefore considered reasonable and appropriate. The suggested wording is not considered necessary or appropriate.
Point 2 of the Development and Design Principles section should be amended to remove reference to "including a significant proportion of homes for families". Reference should be made to the Dwelling size priorities table and up to date housing market assessment. This is a phased development with a long construction programme	The priority for family homes is a key element of the Local Plan housing policies. It is therefore appropriate to seek provision of homes for families on this site to meet identified need.

Main Issues	Councils Response
and the unit mix of later phases of the scheme will need to reflect the market demand that exists at the time.	
The final sentence of point 2 should be amended as follows “The applicant will also be required to <u>should</u> explore opportunities to deliver provision for older people or other people with care or support requirements”, which reflects the fact that Camden have already granted planning permission for a scheme which does not include provision for older people or people with care/support requirements and is therefore not ‘justified’ in this case.	The approach is consistent with policy H8 - Housing for older people, homeless people and other people with care or support requirements, which seeks a proportion of housing in the largest housing developments to meet the specific needs of these groups. The allocation will apply to any future planning applications on the site.
Point 3 of the Development and Design Principles section acknowledges the West End Lane to Finchley Road SPD, the Fortune Green and West Hampstead Neighbourhood Plan and the extant planning permission for the O2 Masterplan Site, which are supported.	Support welcomed.
Suggested amended wording: "be taken forward in a coordinated way, working jointly with other landowners and neighbouring sites, <u>in order to achieve maximum regeneration benefits</u> . The Council will resist <u>piecemeal</u> schemes that prejudice future development and design quality across the whole site and wider area, and <u>especially</u> where delivery would take place before necessary infrastructure is delivered”.	The suggested wording is not considered necessary.
Point 6 should also refer to town centre uses being focussed within the West Hampstead town centre (as well as Finchley Road / Swiss Cottage)	The site boundary does not include any of West Hampstead Town Centre.
Amend the point to include reference to a cinema in line with market requirements to reflect consumer patters and to be effective. Suggested additional wording “make provision for leisure uses on site, including a cinema. <u>A cinema will be provided in line with market requirements</u> ”. There is a need for policy to be flexible to reflect that there could be changes in consumer patterns.	The policy does not specify the type and size of cinema. This would be determined at the detailed planning application stage.
Amend point 8 to read: "contribute towards the provision of new and/or improvement of existing, community facilities and services, <u>including a health facility located near the West Hampstead interchange</u> , to meet increased resident needs in accordance with Policy SC2 (social and community infrastructure). <u>Phase 2 is considered the right location for the health facility because it is well located in relation to the bus routes and the West Hampstead interchange thus maximising accessibility from all modes of public transport</u> ”	It is not considered necessary or appropriate for point 8 to provide detail on the phasing or location of the health facility.
An extra requirement has been added for development to contribute to the enhancement of the adjacent Site of Nature Conservation (SINC). It is not appropriate to introduce a further financial burden on the development at this stage in the process. Camden have already granted planning permission for a scheme which does not contribute to the adjacent SINC. Suggest wording is amended as follows: “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 approach in point 13 is considered appropriate. It is in accordance with Policy NE2 (Biodiversity) and will apply subsequent application on the site.
Add a bullet point further bullet point as follows: <u>(14) Provision of a strong, convenient and direct east-west route linking Finchley Road into West End Lane - this needs to be a generous, 24-hour, open, green, well overlooked and inclusive “street” - but not for vehicles</u>	The east - west route is already referred to in criterion 15 and therefore the proposed wording is not necessary.
Support the identification of the Site as being a location where tall buildings may be an appropriate form of development. the reference to the height range identified in the Camden Building Heights Study when the current and recently granted planning permission does not align with this is not appropriate and is confusing. The policy should refer to the permitted scheme height only. Suggested amended wording: “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	It is considered appropriate to include factual information on both the Building Height Study and the heights granted in the planning permission. The heights approved in the planning permission reflected the design of the specific scheme and its impacts and benefits. The findings of the Building Height Study would be relevant to any subsequent proposals.

Main Issues	Councils Response
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. For any alternative development proposals, 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".	
Amend point 14 to refer to west Hampstead and Finchley Road undergrounds in two separate bullet points. Suggested amended wording Facilitate and contribute towards 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 o Facilitate and contribute towards the delivery of new links / step free access into Finchley Road underground station and provide appropriate financial contributions to support access and capacity improvements at this station.	It is considered that the proposed wording is not needed and results in unnecessary duplication
Remove bullet point 4 in the other considerations section referring to demolition, as this unnecessarily repeats policy requirements set out in the Responding to climate change chapter.	The wording of the bullet point is considered appropriate.

Site Allocation Policy W3 - 11 Blackburn Road Policy

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. future growth Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Site Allocation Policy W4 - 13 Blackburn Road

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Site Allocation Policy W5 - 188-190 Iverson Road

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Site Allocation Policy W6 – Land to the rear of Meridian House, 202 – 204 Finchley Road

Number of representations: approx. 3

Representations received from:

- Thames Water
- Network Rail
- Redington Frogna! Neighbourhood Forum

Main Issues	Councils Response
Object to Site Allocation Policy W6 for the following reasons: - Its in an area of green space deficiency and much underground water; - It should be developed in the way set out in the Redington Frogna! Neighbourhood Plan.	The allocation focuses on a small part only at the rear of the site, not the whole site. The Neighbourhood Plan provides guidance on the site but does not formally allocate it. and therefore, the viability and deliverability of the redevelopment principles set out in the Plan were not tested.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
Network Rail are the ‘passive freeholder’ for the site with ArcCo. holding a long-term lease. Network Rail have no response to make in relation to this site.	Comment noted.

Site Allocation Policy W7- Gondar Gardens Reservoir

Number of representations: approx. 8

Representations received from:

- Thames Water
- Resident
- CPRE
- Life Care Residences Ltd

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.
The map in the Submission Draft implies that the whole of the reservoir area is designated for development. It is not clear from the Development and Design Principles how the undesignated area is to be defined. These principles appear to allow for consideration of plans for a Residential Care Home which would imply the use of the whole site (including the SNIC). Such a development has been clearly rejected by previous planning applications on the grounds of protecting the SNIC.	The site plan identifies the whole site for identification purposes. The designations that apply to the site are identified on the Policies Map.
Previously agreed SINC boundary is not shown correctly. The northern end was narrower previously which made development unviable.	The SINC boundary reflects the findings of the Review of Sites of Importance for Nature Conservation 2024 carried out by the London Wildlife Trust to inform the Local Plan.

Main Issues	Councils Response
With regard to making the disputed undesignated site available, it is noted that this would require very substantial site preparation, as the removal of the current reservoir structure which would be very costly and would severely disrupt the near neighbours to the site on Sarre Road. A demolition of the reservoir roof would disrupt wildlife on the site thus negating the rationale for designating the majority of the site as SNICC. Refer to the many comments on the planning application 2018/3692/P which should be part of the "Context" for the allocation.	Any application would need to justify demolition in accordance with Local Plan policies CC2 and CC3 relating to retention of existing buildings and circular economy, and policy NE2 on biodiversity, which seeks to ensure that development protects and enhances nature conservation and biodiversity.
The whole site should be designated as a SINC, which would negate the use of the site for housing on any part of the site. It could then be used for recreation facilities or general open space.	The SINC boundary reflects the findings of the Review of Sites of Importance for Nature Conservation 2024 carried out by the London Wildlife Trust to inform the Local Plan.
General support for revisions made to Site Allocation W7, specifically referring to: • Appropriateness of site for both self-contained homes and/or specialist care homes. • Recognition of complexities of the site (existing structures and SINC). • Noting the indicative capacity (30 additional homes). • Based on historic planning applications (since 2011, residential/ specialist housing for elderly).	Comments noted
Concerns that the Site Allocation continues to protect views across the site from private properties. It has long been established that there are no rights to a view from a property, unless specifically identified as a protected or locally important view which contributes to the interest and general character of Camden. The site is not is a conservation area and views are not of benefit to the public. Furthermore, any future planning application would be assessed in terms of impact on neighbouring properties. Therefore, the legal standing of the Site Allocation is questioned. The requirement to 'protect views' should be removed.	The views across the site have been considered important in previous planning decisions and are referenced in the adopted Neighbourhood Plan.
The 'Development and Design Principles' section should be updated to acknowledge that potential impacts on neighbouring boroughs' highway and transport networks should be considered in the assessment of a future planning application(s). 30 additional homes onsite would unlikely give rise to issues on Barnet's highways network. Notwithstanding, LB Barnet would welcome being consulted on any future planning proposal for this site.	Additional text is not considered necessary. All residential developments would be car free in accordance with Policy T5 (Parking and car free development)
This should be removed from the site allocations and retained in its entirety as a green space for the public to enjoy.	Planning permission for this site has been granted on appeal, establishing the principle of development. The allocation seeks to protect and enhance the designated open space, SINC and Local Green Space.

Site Allocation Policy W8 – 88-92 Kilburn High Road

Number of representations: approx. 1

Representations received from:

- Thames Water

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Site Allocation Policy W9 – Land at Midland Crescent, Finchley Road

Number of representations: approx. 4

Representations received from:

- Stadium Capital Holding

Main Issues	Councils Response
Background information on changes to national planning policy and site context. Refer to Reg 18 representation attached. Support the general aims of Site Allocation Policy W9 and Policy D2 (Tall Buildings). However, it is important that the policies are sufficiently flexible to avoid unintended consequences, as set out below.	Support welcomed
The indicative site capacity in the current draft plan reflects the extant permission dated March 2015. The national, regional and local planning policy position has shifted considerably since, and there is a greater emphasis than ever before on optimising brownfield land in sustainable urban locations. The draft allocation should be amended as follows	The indicative capacity reflects the extant planning permission. As noted in Local Plan paragraph 1.36, capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.
To ensure that the site’s development potential is optimised, the draft allocation should be amended as follows: Indicative capacity - "Subject to a careful design and massing, the site is capable of accommodating a tall building on the Finchley Road frontage."	The site is not identified in the Camden Building Height study as a site as a location where tall buildings may be an appropriate form of development. Any application for a tall building would be assessed against Policy D2 (Tall Buildings) and all other relevant policies.
Remove reference to the planning permission and replace with suggested wording: New development should apply a design–led approach to achieve the optimum development capacity of the site, while considering heritage, townscape and neighbour amenity. Any future planning applications should take into account that the site is within a Flood Risk Area.	The existing wording, referring to the extant planning permission, is considered appropriate.

Site Allocation Policy W10 – 104A Finchley Road

No responses received

Site Allocation Policy W11 - Abbey Co-Op Housing Site, Emminster and Hinstock

No responses received

Site Allocation Policy W12 - 100 Avenue Road

Number of representations: approx. 1

Representations received from:

- Belsize Society

Main Issues	Councils Response
We are surprised and disappointed the highly significant new 100 Avenue Road development (W12), on the border of area C, has not been given any detailed consideration in this plan.	Site allocation W12 -100 Avenue Road reflects the fact that the site has planning permission and works have commenced. Any subsequent application will be assessed against the allocation and all relevant Plan policies, including those on design (D1) and open space (SC4).

Site Allocation Policy W13 - 551-557 Finchley Road

Number of representations: approx. 1

Representations received from:

- LB Barnet

Main Issues	Councils Response
Table 7 should clarify whether the planning consent for this site has been implemented.	Planning permission has been implemented and is under construction. Minor amendment proposed.

Site Allocation Policy W14 - 317 Finchley Road

Number of representations: approx. 1

Representations received from:

- LB Barnet

Main Issues	Councils Response
Given this site is identified as being under construction it is unclear why it is allocated in the Local Plan.	It is considered appropriate to retain the allocation until implementation of the planning permission is complete.

Chapter 6 – North Camden

Number of representations: approx. 7

Representations received from:

- Highgate Neighbourhood Forum
- Highgate Society

Main Issues	Councils Response
North Camden - Allocation sites design principles do not conform to NE1 and NE2. There is nothing about ecological and biodiversity targets.	Planning applications are considered against all relevant Plan policies. It is therefore not necessary to refer to ecology and biodiversity matters in N1 as they are covered in the Plan's natural environment policies.
Although Highgate is presumably a Neighbourhood Centre, there is no detail about how this area, which is struggling as a shopping centre, is to be supported. The boundary with Haringey runs along the middle of the High Street which makes any problem more intractable. Camden should work with Haringey to improve economic activity along the shared High Street.	The Local Plan is a borough wide strategy and, as such, does not include detailed material on individual neighbourhood centres. Detailed planning policies for the high street could also potentially be considered as part of a future review of the adopted Highgate Neighbourhood Plan.
Highgate is a small village with two huge private schools and two primary schools educating around 4,000 children. Many of these pupils arrive by car, increasing congestion problems. The problems Hampstead has with school traffic are referred to, similar problems in Highgate are ignored.	The traffic impacts of all school development in the borough, regardless of its location, will be assessed against relevant policies and guidance, including Local Plan policies on transport and air quality.
Paragraph 6.4, in respect of Highgate, some further explanation would be helpful.	The Council's approach to supporting designated centres is set out in Policy IE6. No additional wording in paragraph 6.4 is considered necessary.
Paragraph 6.6 Much of Dartmouth Park is actually very close to Hampstead Heath and Waterlow Park. The Highgate N6 postcode area also has a high concentration of schools where significant issues exist concerning the school run.	The traffic impacts of all school development in the borough, regardless of its location, will be assessed against relevant policies and guidance, including Local Plan policies on transport and air quality.
6.8. it would be worth adding that the Highgate Neighbourhood plan covers both the Camden and Haringey sides of Highgate.	It is not considered that it is necessary to insert this additional information.
6.9. An Infrastructure delivery Plan is mentioned which we are not aware of.	An Infrastructure Delivery Plan has been prepared to support the Local Plan and this is available to view on the Council's website.

Policy N1 – North Camden

Number of representations: approx. 5

Representations received from:

- Highgate Society
- Transport for London
- NHS HUDU

Main Issues	Councils Response
Part F - We welcome the cross referencing of the Camden Transport Strategy and Cycling Action Plan within the policy.	Support welcome.
Please can a specific reference be made to the need to support the Highgate Village Town centre through appropriate public realm refurbishment and enhancement, following the removal of the 271 bus turnaround area.	This level of detail for individual centres is not considered appropriate for the Local Plan.
13.20. states: "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	Support welcomed. Comment noted.

Main Issues	Councils Response
works providing there has been no breaches of the Construction Management Plan.” This arrangement is welcome, and the potential use of Bonds to secure better compliance with developer obligations across a wider range of issues should be explored.	
N1.F1 Infrastructure Given such controversy over the DPHN it is not appropriate to create a dependency where local planning is used to substantiate experimental traffic measures. This policy should be removed, or qualified as subject to positive local support otherwise the credibility of the Local Plan as a consensus document will be undermined and devalued.	It is considered reasonable for the policy to identify that the delivery of healthy streets schemes is a key priority for the area. No change to wording is therefore considered necessary.
As the needs of the NHS will change over time, ongoing consultation with the ICB will be required to ensure that the delivery of an Integrated Care Hub is the most efficient way to deliver its priorities.	Comment noted.

Site Allocation Policy N2 - Mansfield Bowling Club

Number of representations: approx. 5

Representations received from:

- Harrisson Varma Projects
- Thames Water
- CPRE

Main Issues	Councils Response
Sewer Treatment Works catchment Beckton. We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth. This site has planning approval so we have not undertaken any further assessment. If the proposal changes we will need to reassess.	Comment noted. No change required.
Policy is unsound and fails to optimise the sites capacity. Figure of 23 is based on the previous planning permission which has been implemented. There is feasibility work that shows a capacity of 50 -70 homes.	The site capacity is an indicative figure, based on the extant planning permission. As noted in Local Plan paragraph 1.36, capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.
The site has been cleared so reference to substantial demolition should be removed.	We will propose a modification to reflect the clearance of the site.
Allocated uses should be changed from permanent self contained homes / or specialist care home to residential development in uses classes C2/C3, open space and sports facilities. Allocated uses are considered overly restrictive and should be more flexible to allow other forms of residential such as co living, which would help meet the net household growth for single person households. Subject to the changes above, the allocation is wholly supported.	Self-contained residential use is the priority use of the Local Plan and the Plan's approach reflects the intense competition for the limited supply of land in the borough from alternative forms of housing such as purpose-built student accommodation. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing.
This should be removed from the site allocations and safeguarded as a green space for community use or as a nature reserve for wildlife.	Planning permission for this site has been granted on appeal, establishing the principle of development. The allocation states development must provide new public open space on the site.

Site Allocation Policy N3 - Queen Marys House

Number of representations: approx. 8

Representations received from:

- Highgate Conservation Area Advisory Committee
- NHS HUDU
- Royal Free Hospital
- Thames Water

Main Issues	Councils Response
The loss of key worker accommodation in North Camden seems very unwise and potentially unsupported by Camden's housing higher level strategies.	Site allocation N3 Queen Mary's House seeks to retain, or reprovide, at least an equivalent amount of affordable housing floorspace to the existing. Paragraph 7.164 in the supporting text to Policy H5 Protecting and improving affordable housing states that where existing housing is for key workers, redevelopment should provide for the same group of occupiers unless their needs have been met elsewhere.
The housing capacity should be increased to 150 additional homes. Greater flexibility is needed in the policy wording.	The housing capacity is based on design-based capacity assessment work, consistent with the approach taken on other sites. As noted in Local Plan paragraph 1.36, capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours. No change is therefore considered necessary.
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted and we will propose a modification.
Broadly support the principle of preparing a site allocation for Queen Mary's House (Draft Site Allocation N3)	Support welcomed.
Strongly support the principle of allocating Queen Mary's House for alternative uses in the future to support the Trust's wider estate strategy. However, to ensure that Draft Allocation N3 is robust and fit-for-purpose, it is fundamental that it is updated.	Support welcomed
It is fully appreciated that the quantum of development acceptable on the site will be dependent on detailed design and will need to be justified in planning, design, townscape / heritage and environmental terms. However, to ensure the optimisation of the site for delivery of new homes, it is requested that the indicative capacity is again increased to circa 150 homes. This approach would align with Draft Policy H1 Maximising Housing Supply. Not only will the above approach ensure that the opportunity to sensitively optimise the delivery of new homes on-site is realised, it will also help maximise the receipt achieved by the Trust to cross-subsidise and deliver on its wider estate strategy and associated public benefits.	The indicative housing capacity is based on site capacity assessment work, consistent with the approach taken on other allocated sites. As noted in Local Plan paragraph 1.36, capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.
The 'original Queen Mary's House' building is not statutorily or locally listed and is referred to as a building which makes a neutral contribution to the Hampstead Conservation Area within the Conservation Area Statement. Therefore, it is considered that the text 'as it is of historical interest' should be removed from Draft Allocation N3. As it stands, the requirement to retain the original building on-site (and the potential retention of other buildings on-site) is too inflexible and could result in the full development potential of this site being overly restricted. Instead, Draft Allocation N3 should allow for the principle of demolition to be explored, and potentially acceptable, when justified in design, townscape, planning and environmental terms. This approach would result in increased flexibility and would help ensure that future redevelopment proposals on-site sensitively optimise the delivery of much-needed new homes. It would also ensure that the cross-subsidy benefits associated with the disposal of the Site, and the opportunity to re-invest sales receipts into vital healthcare-related services elsewhere in the Borough and to deliver unignorable public benefits, is fully realised.	Retaining the original Queen Mary's House building is consistent with Local Plan Policy CC2 (Retention of Existing Buildings). Any application involving demolition would be considered on its merits against the site allocation, Policy CC2 and other relevant policies.

Main Issues	Councils Response
Draft Allocation N3 currently inaccurately states that there is existing affordable housing on-site, which emerging development proposals should seek to retain or replace. There is an element of existing nurses / ancillary health worker accommodation at Queen Mary's House. The existing facilities are outdated and require significant intervention to modernise. However, subject to the demand and need for this accommodation this could either be re-provided on-site or at an alternative location. Given the above, Draft Allocation N3 should be updated to accurately reflect this context. Any references to 'existing affordable housing' should be amended to 'nurses / ancillary health worker accommodation'. In addition, the allocation should allow for a flexible approach to re-providing nurses / ancillary health worker accommodation to reflect the Trust's need and demand. It should also allow for an event where a suitable off-site location is identified by the Trust in the future.	The residential accommodation is considered to be affordable housing floorspace for key workers. The allocation is consistent with the Local Plan's housing policies, which seek to protect affordable housing floorspace.

Site Allocation Policy N4 - Hampstead Delivery Office

Number of representations: approx. 2

Representations received from:

- Thames Water
- Transport for London

Main Issues	Councils Response
To ensure the Site Allocation complies with London Plan Policy T6, an additional part 4 of the policy should be added: ' <u>Development must be car free, except for Royal Mail operational parking.</u> '	Any redevelopment of the site would be expected to be car free in accordance with Policy T5 (Parking and car free development).
Sewer Treatment Works catchment Beckton Waste network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s. Water network RAG assessment 'green' On the information provided we do not envisage infrastructure concerns in relation to this development/s.	Comment noted. No change required.

Chapter 7 – Meeting Housing Needs

Number of representations: approx. 4

Representations received from:

- GLA
- Climate Emergency Camden
- Highgate Society

Main Issues	Councils Response
We do not need the vast numbers of private homes that are being built in London Borough of Camden. Good quality homes should be provided to meet housing need through bringing unused buildings into use, including retrofit of vacant homes. Measures should be taken to reduce the letting of homes through Airbnb for commercial profit and second homes should be discouraged. Camden Council should stop the demolition of existing housing estates and repair and retrofit them instead.	The Council is required by national planning policy to plan to meet the objectively assessed need for housing. The Local Plan housing target reflects the target in the London Plan 2021 and an assessment of capacity. Making the most efficient residential use of existing homes and other buildings will make an important contribution towards the Local Plan's housing target, but the target will not be achieved without the construction of new-build housing, including on existing housing estates.
Where the Society is silent on any Policy, this indicates the Policy is noted and no comment is made.	Comment noted.
The Highgate Society has identified what it considers the following areas of concern with Chapter 7 of Camden's New Local Plan: 1. The major concern is that many of the policies in this section are based on the 2021 London Plan which is now out of date. The new London Plan has just finished its pre consultation exercise. 2. The Society believes the target of 11,500 additional new homes is unachievable due to lack of site availability, lack of construction skills, inflating construction costs and reliance on developer delivery.	See responses to individual comments.

Main Issues	Councils Response
3. The mixed use although welcome should be applied not just to commercial properties but residential as well. The 100% residential policy could lead to large estates which become single use ghettos without supporting infrastructure. 4. The target of 50% affordable housing is unachievable and contradicts the quantum of affordable housing Camden say they will provide. 5. No mention is made of loss of affordable units through Right to Buy. 6. Although it has been running since 2010, there is no audit of what the Community In-vestment Programme actually delivers and its costs. By moving people from their homes CIP is responsible for destroying established communities. In view of this, of embodied energy and other issues, retrofitting should be prioritised over demolition and rebuild. 7. The provision of student housing should be reviewed with a current assessment as to whether there is any demand and Camden should ask itself whether it really does want to be seen to be enabling such luxury accommodation when there is so much need in the borough.	
Recommended that consideration is given to removing references to financial viability being a matter of consideration for development schemes with the view of ensuring that viability testing is only used in a limited way as part of the decision-making process and that most applications would not be subject to protracted viability discussions in relation to a wide range of policy matters.	The references in the Local Plan to considering viability reflect the ambitious targets of the Local Plan in relation to affordable housing, but also in other areas such as climate change and affordable workspace. The Camden Local Plan Viability Study 2025 indicates that these targets will be deliverable in some circumstances and not in others, and supports the inclusion of references to viability in the Local Plan. As the Viability Study points out, the alternative approach would be for the Local Plan to set unambitious targets, allowing some schemes to deliver far less than they have potential to deliver. Regardless of any wording in the Local Plan, applicants may seek to justify submission of a viability assessment at the application stage - see for example NPPF paragraph 59 and planning practice guidance reference ID: 10-029-20190509.

Policy H1 – Maximising housing supply

Number of representations: approx. 41

Representations received from:

- Mount Anvil
- Highgate Society
- Joseph Homes
- London Property Alliance
- Kentish Town Neighbourhood Forum
- Regal
- St George West London Ltd
- UCL
- Land Sec
- Camden YIMBY
- Primrose Hill Conservation Area Advisory Committee
- Life Care Residences Ltd
- Redington Frognal Neighbourhood Forum
- Network Rail
- GLA

Main Issues	Councils Response
Policy H1 should be applied in accordance with policies NE1, NE2, and NE3.	As stated in Local Plan paragraph 1.44, all policies in the Local Plan have full statutory development plan weight and the Local Plan should be read as a whole. Consequently, all relevant policies should be taken into account in when considering the number of homes that can be accommodated on each site, and there is no need to provide cross-references to other policies.
Policy H1 is welcomed (H1B1, H1B3, H1B4).	Support welcomed.

Main Issues	Councils Response
Welcome council tax premium – but how will it be enforced?	Comment noted. The enforcement of Council Tax premiums is not a matter for the Local Plan.
The Plan simply states that Camden wants to prevent year-round use of housing as short-term lets but it is entirely quiet about the methods that would be used to achieve this goal.	Under Policy H1 Part B.4, the Council will resist the development of new homes intended for 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. In relation to existing homes, the Council takes enforcement action against landlords who are exceeding the 90-day limit for short-term lets where sufficient evidence is available and it would be expedient to do so, and is lobbying national government for tighter controls.
In the spirit of prioritising permanent self-contained housing, a rule is required to make housing the default option, or first option, if and where commercial use is no longer viable. An example is a building in Kentish Town Road for which no office tenant could be found and where permission has been granted to change use into a hotel earlier in 2025. At this time, rules make it impossible to consider or indeed force a switch to residential. This lack of rule needs to be addressed, along the lines of the goal stated in section 7.29: "Where vacant or underused sites are suitable for housing ... we will expect them to be redeveloped for permanent housing..."	Visitor accommodation such as hotels is identified by the NPPF as a main town centre use and is supported by the London Plan. The Local Plan approach is set out in Local Plan Policy IE5. While the Local Plan continues to prioritise permanent self-contained housing, it cannot rule out all other alternative uses where the existing use of a building ceases to be viable.
• NPPF Paragraph 61 requires plans to meet the full objectively assessed housing need (OAN), calculated using the Government's Standard Method unless exceptions apply. • Camden's evidence (Standard-Method calculation, 2024 base year) indicates a need for ≈ 3,137 dwellings per annum (dpa). • Draft Policy H1 instead rolls forward the London Plan capacity figure of 1,038 dpa, giving 11,550 homes 2026-2041 – barely one-third of the OAN.	In London, the "Objectively Assessed Need" is calculated for the whole of Greater London and distributed by the London Plan to individual boroughs on the basis of their capacity - see the government's planning practice guidance reference ID: 2a-013-20241212. The London Plan 2021 sets a housing target of 1,038 additional homes in Camden per year from 2019/20 to 2028/29. The Local Plan has sought to maximise the delivery of housing in line with this target and aims to deliver at least 11,550 additional homes from 2026/27 to 2040/41 on the basis of the capacity of developable sites in the borough.
The plan does not seek to meet identified need. Either (a) raise the borough requirement to ~3,137 dpa (plus backlog) with supporting site allocations and minimum densities, or (b) produce Statements of Common Ground with neighbouring LPAs and the Mayor demonstrating how the ~2,100 dpa gap will be met elsewhere. Local Plan has found multiple areas where the plan does not comply with the National Policy Planning Framework. The plan should be rejected by the planning inspector.	In London, the "Objectively Assessed Need" is calculated for the whole of Greater London and distributed by the London Plan to individual boroughs on the basis of their capacity - see the government's planning practice guidance reference ID: 2a-013-20241212. The London Plan 2021 sets a housing target of 1,038 additional homes in Camden per year from 2019/20 to 2028/29. The Local Plan has sought to maximise the delivery of housing in line with the London Plan and aims to deliver at least 11,550 additional homes from 2026/27 to 2040/41 on the basis of the capacity of developable sites in the borough. The approach taken is considered to be consistent with national and regional policy.
H1, D1, DS1, DM1 Minimum-Density Policy (plan omission). NPPF Paragraph(s) Breached 125. Introduce numeric Public Transport Accessibility Level linked density minima for town centres and PTAL 4+ corridors.	Local Plan Policy H1 indicates that we will seek to meet or exceed the Plan's housing targets through a number of mechanisms, including optimising the homes delivered on each site by using a design-led approach (Part B.7). Supporting paragraph 7.31 indicates that, as a broad guideline, 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).
Whilst it is understood that the requirement to provide 11,550 additional new homes by 2041 is driven at National and Regional level, the Society feels this is an unrealistic target in a mature urban area such as Camden. The Society is of the view that Camden should ensure the rush for additional homes does not cause irreversible damage to the fabric and community structure of the Borough.	The NPPF indicates that Local Plans should meet the objectively assessed need for housing. In London, this is assessed for the whole of Greater London and distributed by the Council as required by national planning policy to plan to meet the objectively assessed need for housing. The Local Plan housing target reflects the target in the London Plan 2021 and an assessment of capacity. The capacity of sites allocated in the Local Plan has been assessed on the basis of existing planning permissions, or using a design-led approach consistent with the requirements of the London Plan. The Local Plan contains policies to protect and enhance the borough's character and quality of life. The Council has also published an Infrastructure Delivery Plan, which identifies known future projects and delivery required to support the delivery of the Local Plan. We therefore considered that the proposed

Main Issues	Councils Response
	housing target can be met without significant harm to the borough's fabric and community.
H1B.2 Whilst the Society supports housing for those with specific needs, it strongly objects to the provision of any more student housing.	The Local Plan is required to be in general conformity with the London Plan. The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year. Accordingly, the Local Plan proposes that 5.7% of this need (200 bedspaces per year) should be met in Camden, in line with the proportion of London's full-time 18+ students currently living in the borough. 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. The Council considers that the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market. The provision of higher education and research significantly contributes to Camden's ambition for its local economy to be strong, sustainable, and inclusive.
H1B.3 The policy of returning vacant homes to use is to be welcomed but this is a resource hungry activity. Camden needs to identify and provide suitable resources to enable this Policy to be delivered.	The allocation of resources to particular Council functions is not a matter for the Local Plan.
H1B.5 In terms of retaining housing approvals, if this Policy prevents land banking by developers, it is welcomed by the Society. However, this clause appears to apply rigid housing only policies to development and does not allow sufficient flexibility for the provision of mixed use developments. Large housing schemes need supporting infrastructure built into them in the form of services, facilities, amenity space, and even employment.	Policy H1 seeks to retain consented self-contained housing. It does not preclude the inclusion of other uses on housing sites or prevent mixed use developments or the provision of necessary supporting infrastructure, which should be included as part of the submitted scheme.
H1B.6 Optimising provision of permanent housing in underused sites does seem to suggest that Camden is introducing a policy of densification, whereby current low rise low density schemes could be replaced by high rise "regeneration" through Community Investment Programmes.	The NPPF and associated guidance (reference ID: 2a-013-20241212) indicates that Local Plans should meet the objectively assessed need for housing, as distributed between London boroughs by the London Plan. Given the built up nature of Camden, some densification is necessary to meet identified needs. The approach is also consistent with London Plan policy D3 which states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites.
Good design can be considerably compromised by developer's economic pressures diluting the approved schemes, including the use of "signature designers" at the planning stage only. In terms of optimising delivery there should be an awareness of the damage tall building do,	Comment noted. Local Plan Policies D1 to D3 address how excellent design can be achieved, and the particular design considerations relevant to tall buildings and housing.
Policy H1C The reliance on "financial viability" based on developer's profit driven needs may not align with the mix identified to meet housing needs. The Society would like to see the Policy clarified and strengthened so provision of housing does not just become a numbers game of housing stats regardless of size of unit, but actually meets the identified needs, particularly the need for family and affordable housing.	Local Plan Policies H6 to H11 address the particular types of housing needed in the borough and the need for homes with different numbers of bedrooms. In addition, Policy D3 sets out requirements for the design of homes, including the application of space standards. As explained in paragraph 7.33, the purpose of Policy H1 Part C is to allow the Council to adjust our requirements to maintain housing delivery if monitoring shows that we are falling short of our housing target for a sustained period.
Changes to Policy around permanent self contained housing Suggest change to H1 Part B. 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."	Permanent self-contained housing is the priority land-use of the Local Plan. The current wording is considered to be appropriate. No change is considered necessary.
Support the mention of build to rent and housing for older people in considering the diversity of housing.	Support welcomed.

Main Issues	Councils Response
Object to the approach to setting our housing target. Do not consider it to be ambitious enough or positively prepared.	In London, the "Objectively Assessed Need" is calculated for the whole of Greater London and distributed by the London Plan to individual boroughs on the basis of their capacity - see the government's planning practice guidance reference ID: 2a-013-20241212. In Camden, there simply are not deliverable or developable sites available to meet the housing target that would arise from applying the standard method within the borough boundary. The Local Plan seeks to maximise housing supply in Camden using a capacity-based housing target based on the limited land available in Camden and 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). Accordingly, the Local Plan 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), with a target of 703 additional homes per year from 2029/20 to 2040/41, and includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period). We note that this approach taken to setting the proposed Local Plan target is consistent with paragraph 4.1.11 of the London Plan 2021, which states (in part): "If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity..." We further note that a significant element of the under-delivery experienced in Camden in recent years arose from sites not coming forward for development at the rate anticipated by the Camden Local Plan 2017 and the London Strategic Housing Land Availability Assessment 2017 (SHLAA), which informed the London Plan 2021. A big element of the anticipated supply for Camden was within the boundary of the Euston Area Plan, and was heavily impact by a series of national policy changes and delays associated with the HS2 rail project. Another site which has not come forward as quickly as expected is the O2 Centre car park, which was allocated as site 29 in the Camden Site Allocations Local Development Document 2013, with delivery anticipated from 2021-2024 by the housing trajectory for the Camden Local Plan 2017. An application for the wider area including the O2 Centre car park was ultimately submitted in 2022, and granted planning permission in 2023. No housing delivery is now anticipated in this wider area before 2028.
Definition of self-contained housing should acknowledge the role C2 housing for older people can play on housing delivery as identified in the London Plan. Suggested amendment to para 7.9, add a bullet point: <u>Specialist older persons housing (Class C2)</u>	We do not agree with this proposition. Local Plan Policy H1 Part B.2 indicates that the Council supports forms of permanent housing that meet specific needs. Part B.2 explicitly refers to housing for people with care or support requirements, which would include housing for older people that falls within Use Class C2 - in effect care homes. The Local Plan's detailed expectations in relation to housing for older people, homeless people and other people with care or support requirements are set out in Policy H8. Clearly the detail of Policy H8 cannot be incorporated into Policy H1, the Local Plan must be read as a whole. Supporting paragraph 7.232 sets out in detail which types of specialised housing are usually self-contained and which are not. Local Plan paragraph 7.10 sets out the definition of self-contained which informed the 2021 Census, and the same definition has been adopted for the Local Plan. This would not include care homes in Use Class C2. Local Plan paragraph 7.9 provides a checklist of guidance that is relevant to housing but does not necessarily address housing directly. It is not clear how this paragraph would accommodate a reference to specialist older

Main Issues	Councils Response
	persons housing (much of which is NOT in Class C2, as explained in paragraph 7.232).
This para is based on the Sustainable Residential density matrix in the 2016 London Plan and is therefore inappropriate and out of date, particularly as the London Plan topic paper recognises that the majority of development approved exceeded this density. Suggested change is to remove the section referring to the Sustainable Residential Quality density matrix	The London Plan 2021 indicates that a design-led approach should be used to ensure that sites are developed to the optimum capacity (e.g. London Plan Policy GG2). The design-led approach is also adopted by Local Plan Policy H1 B.7. Given the design-led approach, the London Plan no longer contains guidance on appropriate density levels. Nevertheless, paragraph 130 of the NPPF indicates that "plans should contain policies to optimise the use of land in their area" and "should include the use of minimum density standards for city and town centres and other locations that are well served by public transport". We acknowledge that reference to the London Plan 2016 density matrix is not ideal, but note that densities quoted form part of supporting paragraph 7.31 rather than Policy H1, that they are offered "as a broad guideline", and the paragraph states that "the Council recognises that lower or higher densities may be justified in some contexts".
Object to the housing target and the approach taken, including the lack of certainty as to how the backlog is being addressed. Without this information the plan is unsound.	In London, the "Objectively Assessed Need" is calculated for the whole of Greater London and distributed by the London Plan to individual boroughs on the basis of their capacity - see the government's planning practice guidance reference ID: 2a-013-20241212 (issued at the same time as the NPPF in December 2024). In Camden, there simply are not deliverable or developable sites available to meet the housing target that would arise from applying the standard method within the borough boundary. The Local Plan seeks to maximise housing supply in Camden using a capacity-based housing target based on the limited land available in Camden and 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). Accordingly, the Local Plan aims to deliver a minimum of 11,550 additional homes over the plan period to 2041. This incorporates 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), with a target of 703 additional homes per year from 2029/20 to 2040/41, and includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period). We note that if the 11,550 target is divided equally across the 15-year Local Plan period, it equates to 770 homes per year. Further information about how the backlog has been incorporated into the Local Plan's housing target is provided by the paper "Submission Draft Camden Local Plan - Housing Trajectory 2026-2040" published alongside the Local Plan for consultation in May 2025.

Main Issues	Councils Response
The approach is not to be positively prepared nor consistent with national policy. The approach of reverting to a do minimum approach beyond the London Plan target is not considered to be justified or effective. In order to be found sound it must plan for a level of housing that reflects the real and acute need in the borough and nationally. As a minimum the London Plan 20221 annual targets could be carried forward.	In Camden, there simply are not deliverable or developable sites available to meet the housing target that would arise from rolling forward the London Plan 2021 annual target (1,038 additional homes per year) up to 2041. Setting a target of 15,570 additional homes (15 x 1,038) until 2041 - potentially with addition of the backlog since 2019 - would not be effective or deliverable and would not satisfy the tests of soundness for Local Plans set by the NPPF. We consider that the purpose of the government's planning practice guidance reference ID: 2a-013-20241212 (issued at the same time as the NPPF in December 2024) is to provide for the distribution of housing need around a group of local authorities which are covered by a single Spatial Development Strategy. This is particularly important for major cities like Greater London, where authorities in the centre (such as Camden) have the challenge of a highly constrained land supply, provision for a workplace population that substantially exceeds the size of the resident workforce, and consequent competition for land from higher value commercial uses. We note that the London Plan is currently being reviewed, and will result in a new capacity-based housing target for Camden. Once any new London Plan housing target for Camden is published in its final form, this will supersede the housing target in the new Camden Local Plan. The GLA are aiming to publish the new London Plan in its final form in 2027/28 (following examination in public), consequently the housing target included in the new Camden Local Plan housing target may only apply for a short period of time. We are acutely aware of the scale of affordable housing need indicated by the Housing Register and the number of households in temporary accommodation. However, the scale of affordable housing delivery required to fully address this need is simply far beyond the plausible output from deliverable or developable housing land that can be identified in the borough. Finally, we note that HPI data from the Land Registry at September 2025 indicates that over the period from October 2020 to October 2024, the house price index for Camden shows modest growth from 95.9 (corresponding with a monthly average price of £825,440) to 99.3 (corresponding with a monthly average price of £854,866) - a growth of 3.5%. Over the same period, the national index provided by the Building Cost Information Service for calculation of the Community Infrastructure Levy rose from 333 to 391 - a growth of 17.4%. In the context of Camden, where build cost inflation is significantly out-stripping house price inflation, there is clearly no prospect of increasing housing delivery to a level that would push down house prices.
The approach relying on the Sustainable Residential Quality density matrix has not been reviewed and is out of date and was considered by the Planning Inspector for the London Plan to fundamentally conflict with the design led approach and most major developments had exceeded the densities on the table. The continued reference to this table is inconsistent with the Strategic Development Plan and so is not considered in general conformity with the London Plan.	The London Plan 2021 indicates that a design-led approach should be used to ensure that sites are developed to the optimum capacity (e.g. London Plan Policy GG2). The design-led approach is also adopted by Local Plan Policy H1 B.7. Given the design-led approach, the London Plan no longer contains guidance on appropriate density levels. Nevertheless, paragraph 130 of the NPPF indicates that "plans should contain policies to optimise the use of land in their area" and "should include the use of minimum density standards for city and town centres and other locations that are well served by public transport". We acknowledge that reference to the London Plan 2016 density matrix is not ideal, but note that densities quoted form part of supporting paragraph 7.31 rather than Policy H1, that they are offered "as a broad guideline", and the paragraph states that "the Council recognises that lower or higher densities may be justified in some contexts".
Need to understand how the presumption that sites will be developed for housing unless proven unviable might apply to Euston which remains a commercially led mixed use.	The Plan does not preclude mixed used development. Policies S1 South Camden and S2 Euston Area both recognise that development at Euston will include a range of uses.

Main Issues	Councils Response
Want to retain flexibility on use mix to optimise development.	
Some of the specific build standard requirements could impact the viability at Euston.	It is not clear what "build standard requirements" the respondent is referring to. We note that "the economics and financial viability of the development including any particular costs associated with it" are express considerations in Local Plan Policies H2, H4, H6 and H7, whilst the particular circumstances of Euston are acknowledged by Policy H2 "Maximising the supply of self-contained housing from mixed-use schemes" (Part C.5) and supporting paragraph 7.69. More detailed consideration of Euston is contained in the Euston Area Plan 2015, which currently being reviewed and updated.
General support for role that alternative forms of housing beyond traditional self-contained homes can play in relieving pressure on housing stock and supply.	Support welcome.
Regal supports the Council's ambitions to deliver 11550 additional homes. Regal welcomes the introduction of Part B 2, supporting other forms of housing (such as PBSA), and are encouraged by supporting para 7.15 acknowledging challenging market conditions.	Support welcomed
Draft Policy H1 (Maximising Housing Supply) • Support for revision of Draft Policy whereby Student Accommodation is now referred to as a form of housing that assists the Borough in meeting their housing targets.	Support welcomed
- Concerns regarding the approach to meeting housing need and the minimum housing figure of 11,550 being drawn from the London Plan SHLAA 2017. - Also noting the new London Plan would set a revised target, due in 2027. - The proposed approach misses an opportunity to meet the housing needs of Camden and doesn't seek to meet the capacity needs of the London Plan. - This fails to respond to Ministerial Statements by the PM and SoS encouraging the delivery of new homes. - The Framework (adopted December 2024, updated February 2025) requires local plans submitted at Regulation 19 stage after the 12th March 2025 to follow national policy set out in the new Framework. - To be sound, local plans must be positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs informed by a local housing need assessment, conducted using the standard method in national planning practice guidance (Framework paragraph 36 and 62). - It is unclear why the draft Local Plan ignores and does not positively respond to Government policy. - One of the principal aims of national policy is to deliver housing to meet local needs, and in this regard, the government published local standard method housing needs in December 2024. - the CLPRPSD pursues an approach which seeks to deliver less homes up to 2041, than the current, and out of date, 2017 Plan.	In London, the "Objectively Assessed Need" is calculated for the whole of Greater London and distributed by the London Plan to individual boroughs on the basis of their capacity - see the government's planning practice guidance reference ID: 2a-013-20241212. In Camden, there simply are not deliverable or developable sites available to meet the housing target that would arise from the standard method within the borough boundary. Setting a target of 3,137 additional homes would not be effective or deliverable and would not satisfy the tests of soundness for Local Plans set by the NPPF. The Local Plan seeks to maximise housing supply in Camden using a capacity-based housing target based on the limited land available in Camden and 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). Accordingly, the Local Plan 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), with a target of 703 additional homes per year from 2029/20 to 2040/41, and includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period). We note that this approach taken to setting the proposed Local Plan target is consistent with paragraph 4.1.11 of the London Plan 2021, which states (in part): "If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity..."
Table 1.1 notes: <Table in representation> - Borough housing needs consistently rise year on year. - The Council is proposing to reduce its annual housing delivery from 1038 to 770 dpa and its affordable housing delivery from 353 to 200 dpa. - This is despite increasing need, poor delivery, no evidence of a 5-year housing supply and failure of the Housing Delivery Test. - Camden has not been able to positively respond to housing need and under-delivery. - Many strategic policies have not changed since the adopted Local Plan 2017, other than to add burden. - This suggests that the housing delivery constraints applied by the 2017 Plan will remain, and worsen.	
• The draft Local Plan has not been positively prepared to facilitate increased housing delivery, and further burdens are place on development (which did not exist in 2017).	

Main Issues	Councils Response
• Since 2018 there have been significant changes in development economics nationally, and in the Borough due to regulatory changes and other matters including build cost inflation; Part L energy / carbon; Part F & O ventilation; Part S electric car charging; Part B 2nd stair and fire safety; Part P electrical safety; 2nd stair efficiency; finance costs, taxation increases and net zero carbon contributions. • CIL indexation in the borough has increased significantly and the Building Safety Levy has been introduced as set out below. <Table in representation> • These factors in addition to restrictive policies have contributed to decreases in housing delivery. • Annual housing delivery in Camden has been poor as summarised in Table 1.2. <Table in representation>	
• Concern regarding the Council's AMR records for the delivery of affordable homes (1 in 2022/23 and 79 over last three year period). • This points to a need for radical reform, and a flexible approach to implementation at application stage. • The draft Local Plan does not address the reasons why the Council has failed to achieve several of its Annual Monitoring Indicators, particularly for housing. • The housing needs of the borough should be the starting point for plan preparation, and the policies and site allocations should react to those needs. • Policy H1 requires redrafting, and should adopt the standard methodology of housing need.	
Site optimisation to deliver housing • Noting Chapter 7 of the draft Local Plan, para 7.31. Taking account of the Sustainable Residential Quality (SRQ) density matrix. • The approach to density within the draft Local Plan has not been reviewed. It continues to rely on outdated density ranges from the London Plan 2016 Density Matrix. • The 2016 matrix was removed from the London Plan 2021 and considered a constraint on delivery. • The London Plan found that "The majority of approved developments in London have been delivered at densities beyond those recommended in the SRQ density matrix for every year since the commencement of the London Plan in 2004." • Continued reference to the 2016 matrix is therefore inconsistent with the Strategic Development Plan and fails the test for soundness, in not being effective, positively prepared or justified. • Relying on a matrix the London Plan has moved away from is arguably failing the legal test set out in section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 (as amended). • Reference to the Sustainable Residential Quality [SRQ] density matrix in the London Plan 2016 should be deleted.	The London Plan 2021 indicates that a design-led approach should be used to ensure that sites are developed to the optimum capacity (e.g. London Plan Policy GG2). The design-led approach is also adopted by Local Plan Policy H1 B.7. Given the design-led approach, the London Plan no longer contains guidance on appropriate density levels. Nevertheless, paragraph 130 of the NPPF indicates that "plans should contain policies to optimise the use of land in their area" and "should include the use of minimum density standards for city and town centres and other locations that are well served by public transport". We acknowledge that reference to the London Plan 2016 density matrix is not ideal, but note that densities quoted form part of supporting paragraph 7.31 rather than Policy H1, that they are offered "as a broad guideline", and the paragraph states that "the Council recognises that lower or higher densities may be justified in some contexts".
In response to the government's aim to deliver economic growth by optimising brownfield land for sustainable housing development, the draft Local Plan should be updated to make accessible, brownfield supermarket sites available for development.	Camden by nature has a limited supply of land available for re-development. Where sites have been identified and assessed as being suitable, available and achievable then these have been allocated in the Local Plan. Further information on the approach the Council has taken to site identification is set out in the Site Selection Topic Paper which was published alongside the Regulation 19 Local Plan.
The proposed drop in the housing target is considered significant and is not consistent with paragraph 0.0.21 of the LP2021 which is clear that boroughs should only alter their housing targets where they have evidence demonstrating that they can exceed them.	Para 0.0.21 of the London Plan states that "The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan." Paragraph 0.0.21 of the London Plan 2021 relates to circumstances where a borough is revisiting their London Plan housing target. This is not the case with the Camden Local Plan, which retains Camden's housing target from

Main Issues	Councils Response
	the London Plan (that is, 10,380 new homes between 2019 and 2029). Paragraph 0.0.21 is therefore not considered to be a relevant consideration in terms of the Camden Local Plan or its general conformity.
Whilst the approach taken to setting the housing target in the Plan is in line with London Plan paragraph 4.1.11, in the context of working towards delivering 88,000 homes per annum as calculated at a national level through the standard method, this approach (specifically the text in 4.1.11) is now considered to be out of date. Boroughs who are currently working on their Local Plan, such as LBC, should seek, as a minimum, to roll over the current London Plan target beyond 2028/29, including any shortfall accrued to date, and to continue to take proactive measures to increase housing supply.	Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. This means that Camden Local Plan needs to be in general conformity with the current London Plan 2021. Our approach to setting the Local Plan's housing target is consistent with London Plan para 4.1.11, as noted in the GLA's response. The GLA consider the supporting text to be out of date and that Camden should, as a minimum, roll over its current London Plan target beyond 2028/29. However, that approach is not set out in the London Plan, and, therefore, failing to follow it cannot be a general conformity matter.
The draft Plan acknowledges that the emerging London Plan will result in a new housing target for Camden once adopted, and as such the housing target contained within the Local Plan may only be in place for a short period of time. Whilst this is welcomed, it is recommended that there is flexibility in the draft Plan to safeguard for this eventuality. Consideration may need to be given to committing to an early Local Plan review following the publication of LBC's new housing targets within the emerging London Plan.	Paragraphs 2.8 and 7.7 of the Camden Local Plan Proposed Submission Draft both make it clear that we recognise that the new London Plan will set a new housing target for Camden. Furthermore, once the new London Plan is adopted it will become part of the Council's development plan and be used for decision making purposes. We are co-operating with the GLA on the review of the London Plan and have been fully involved in the new Londonwide SHLAA that will inform the housing target for Camden.
There is a national mandate to deliver more homes, yet the draft Local Plan sets a target of 770 additional homes per year, which is significantly lower than the current local, regional and national housing targets for the borough.	The housing target in the Plan is capacity based and reflects the limited availability of land in Camden. The Local Plan includes measures and allocations to support the delivery of housing in Camden.
The new London Plan is likely to set an updated target for the council. If the new target is in excess of the 770 proposed by the draft Local Plan, it will be inconsistent with both regional and national policy and should be amended to address this.	The Local Plan notes that the GLA are currently reviewing the London Plan, which will result in a new housing target for Camden. Once adopted the new London Plan target will supersede the housing target in the Local Plan.
Policy H1 now supports other forms of permanent housing to meet more specific needs such as purpose-built student accommodation (PBSA) and housing for people with care or support requirements. This addition is welcomed and supported.	Support welcomed.

Policy H2 – Maximising housing supply of self-contained housing from mixed use schemes

Number of representations: approx. 20

Representations received from:

- Highgate Society
- London Property Alliance
- Lendlease and the Euston Landowners
- Kentish Town Neighbourhood Forum
- British Land
- Lazari Investments PLC
- Places for London (Network Rail)
- British Museum
- St George West London Ltd
- Dominus
- General Projects PLC
- Kings Cross Central Limited Partnership
- Reef and Partners
- Lab Tech

Main Issues	Councils Response
Agree with the flexibility that Part C of the policy contains.	Support welcomed.
Requiring housing from commercial led schemes undermines policy objectives promoting economic development. The policy is in direct conflict with the London Plan. Camden is only borough in London which has a mixed-use policy, impacting on its commercial attractiveness.	Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing.

Main Issues	Councils Response
Camden is falling short of achieving its annual housing targets. The policy results in pre-application negotiation delays as lengthy discussions are held to demonstrate why the delivery of housing alongside commercial uses is inappropriate.	Local Plan Policy H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies. We consider that this assists rather than harming the borough's commercial attractiveness. We do not consider that Local Plan Policy H2 is in conflict with the London Plan since it provides for all existing non-residential floorspace to be retained or replaced, and provides for 50% or more of the additional floorspace to provide non-residential uses. Part C.4 specifically recognises CAZ strategic functions and specialist clusters. The GLA's response on the draft Local Plan did not raise Policy H2 as being in conflict with the London Plan. Policy H2 incorporates an appropriate degree of flexibility, including flexibility for applicants to make a case for on-site or off-site provision of housing, a reduced proportion of housing, or a payment-in-lieu.
The requirement to deliver housing from non-residential schemes will undermine economic development objectives within the South Camden area and CAZ. This conflicts with Policy SD4 and SD5 of the London Plan which states that residential development should not compromise the strategic functions of the CAZ. If it is not possible to deliver residential on-site, developers are required to go through an extensive pre and post application exercise to justify why residential cannot be delivered on-site causing significant delays to planning discussions / applications. Concern about modest uplifts in commercial floorspace resulting in a requirement to deliver very small amounts of residential within commercial buildings which will disincentive commercial developers. Camden is only borough in inner London still proposing a mixed use policy in its Local Plan If it is to remain in some form, a more suitable mechanism would be to require a payment to aid housing developments in the Borough or raise the thresholds at which the policy applies e.g. 2000sqm of additional commercial floorspace.	Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. Local Plan Policy H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies. We consider that this assists rather than harming the borough's commercial attractiveness. We do not consider that Local Plan Policy H2 is in conflict with the London Plan since it provides for all existing non-residential floorspace to be retained or replaced, and provides for 50% or more of the additional floorspace to provide non-residential uses. Part C.4 specially recognises CAZ strategic functions and specialist clusters. The application of all Local Plan policies can have an impact on the length of pre-application discussions, but as Policy H2 is long-established it should not lengthen discussions unduly provided that applicants and their advisors approach discussions from the perspective of how they might best satisfy the policy rather than how they might be able to evade it. Policy H2 incorporates a great deal of flexibility, including flexibility for applicants to make a case for on-site or off-site provision of housing, a reduced proportion of housing, or a payment-in-lieu. We note that Policy H2 does not require housing where less than 200 sqm GIA of additional floorspace is proposed, and provides greater flexibility for off-site provision where less than 1,000 sqm GIA of additional floorspace is proposed. We also note that whilst payments-in-lieu are welcome where no other options for housing delivery are available, there simply are not sufficient development sites available in the predominantly residential parts of the borough to satisfy housing needs.
Existing Local Plan Policy H2, which requires housing from commercial schemes, is increasingly challenging and threatens to undermine the deliverability of commercial development in the KQ. If Policy H2 is retained, it should not apply in the Knowledge Quarter. If a form of mixed-use policy is to remain in the Local Plan and apply to the Knowledge Quarter, we agree with the LPA CWG suggestion that it should take the form of a financial	Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. The Knowledge Quarter is not a precisely defined area, but is generally considered to covers a 1 mile radius from King's Cross Station. This area includes almost all of the

Main Issues	Councils Response
contribution to be applied to other Camden-led housing developments in the Borough rather than requiring housing to be provided on or off site in the KQ If housing is required, we consider that it would be helpful to clarify that the Council will prioritise the delivery of affordable housing.	CAZ within the borough, the King's Cross Opportunity Area, and a large part of Camden Town. As the majority of the area to which Policy H2 Part B applies is within the Knowledge Quarter, the policy would have very little effect if the Knowledge Quarter was removed from its scope. Policy H2 (Part B.8) is clear that 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. Through supporting paragraph 7.60, the Local Plan indicates that the Council will provide considerable flexibility in the location of off-site provision. With regards to prioritising affordable housing, Policy H2 (Part B.7) is clear that where the self-contained housing target cannot be met in full, we will prioritise the on-site delivery of affordable housing.
We agree with this overall aim, ideally with residential being on-site rather than off-site as having mixed tenure from the outset enables communities to be better integrated and socially cohesive.	Support welcomed.
The BM maintains that it would be inappropriate to seek a contribution to permanent self-contained housing from a site such as the BM. The BM therefore welcomes the amendment to the supporting text (para 7.50) to include specific reference to 'museums' in the list of uses serving a 'public purpose' and which are therefore exempt from this element of the policy.	Support welcomed.
This policy is generally supported in principle by the Society where "living over the shops" reflects the traditional forms of building within High Street.	Support welcomed.
There could be concerns as to how the 50% can be achieved and whether it is applicable to relatively small schemes. There is concern that this will lead to much higher developments.	Policy H2 incorporates flexibility in the application of the policy, notably where less than 1,000 sqm of additional floorspace is proposed.
Mixed use policy is not justified or fit for purpose. Sites should be allocated separately for housing and employment in order to be more effective at delivering housing. South Camden in particular should have wholly residential or commercial schemes. H2 should be deleted.	Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. Local Plan Policy H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies. We consider that this assists rather than harming the borough's commercial attractiveness. Policy H2 incorporates a great deal of flexibility, including flexibility for applicants to make a case for on-site or off-site provision of housing, a reduced proportion of housing, or a payment-in-lieu. We further note that Policy H2 does not require housing where less than 200 sqm GIA of additional floorspace is proposed, and provides greater flexibility for off-site provision where less than 1,000 sqm GIA of additional floorspace is proposed. We also note that for the majority of sites in South Camden, the highest value uses are likely to be non-residential rather than residential, whilst policies in the London Plan 2021 and the Local Plan for the CAZ and for the Town Centre of Camden Town will favour non-residential uses. It will rarely be possible to allocate sites in South Camden solely for residential use, and there simply are not sufficient development sites available in the remaining predominantly residential parts of the borough to satisfy housing needs.

Main Issues	Councils Response
Suggested changes to H2 include: * recognition that delivery of a small number of homes can significantly compromise commercial buildings and that a payment in lieu would be better * specify the acceptable threshold for payment in lieu * Policy should first appraise whether housing should be provided at all rather than setting out range of considerations	We note that there are several examples in the borough that have successfully delivered expanded commercial space alongside modest amounts of self-contained housing, such as 150 Holborn, where an uplift of around 2,400 sqm of commercial space (enabling accommodation of global consultancy Sidara) alongside 13 homes (2016/2094/P), and 115-119 Camden High Street. where an uplift of around 1,200 sqm of commercial space (accommodating a Premier Inn Hub) alongside three affordable homes (low-cost rent) (2019/3138/P). Nevertheless, criteria in Policy H2 Part C indicate that the Council will take account of the potential impacts of including on-site housing, such as the impact on the efficiency and overall quantum of development and the needs of existing users. We also note that whilst payments-in-lieu are welcome where no other options for housing delivery are available, there simply are not sufficient development sites available in the predominantly residential parts of the borough to satisfy housing needs. We do not consider that splitting the consideration of Policy H2 into two phases (first whether housing should be provided, and second presumably the nature/ quantum of provision) since it is rarely possible to assess whether there is potential for a site to include housing without detailed examination. Nevertheless, Part B indicates at the outset that additional floorspace of under 200 sqm does not trigger a housing requirement, whilst Parts B.2, B.3 and B.4 are clear that no requirement arises (respectively) in the defined Hatton Garden area, from development that is publicly funded or serves a public purpose, or from existing/ replacement floorspace. Policy H2 also provides greater flexibility for off-site provision (or potentially a payment-in-lieu) where less than 1,000 sqm GIA of additional floorspace is proposed.
Clarity needed in relation to policy H4 requirements to provide market and affordable housing.	We do not agree that the relationship between Policy H2 and Policy H4 is unclear. In connection with Policy H4, paragraph 7.110 indicates 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), while Policy H4 Part B.2 indicates that development capacity will be assessed on the basis that 100sqm (GIA) of housing floorspace creates capacity for 1 home. Consequently, there is flexibility for a payment-in-lieu of affordable housing where a residential development would involve less than 1,000 sqm of additional housing floorspace. In connection with Policy H2, paragraph 7.54 indicates that 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. This is clearly consistent, since a total of 2,000 sqm of additional floorspace (including non-residential space) would be expected to provide 1,000 sqm of additional housing floorspace. We do not agree Policies Map would be clarified by adding the boundary of the areas where Policy H2 Part B applies. The Policies Map already shows the boundary of the defined South Camden sub-area and the town centre boundaries of Camden Town and Finchley Road/ Swiss Cottage. The remaining area described in Local Plan paragraph 7.39 is simply the enclosed area between the boundary of the South Camden sub-area and the town centre of Camden Town.
Welcome Part B.3 of Policy H2 and text in paragraph 7.50 that the Council will not seek a contribution from those elements of a development that are publicly funded or otherwise serve an acknowledged public purpose. Part C.5 of Policy H2 and paragraph 7.50 specifically mention Euston stations. Consider that this should also be widened to include the Camden Over Station Development	We note that Policy H2 Part C.3 indicates that the housing target is not applied to elements of a development which are publicly funded or otherwise serve an acknowledged public purpose, while supporting paragraph 7.50 specifically recognises the public funding of transport infrastructure. We further note that "the economics and financial viability of the development including any

Main Issues	Councils Response
site allocation. Alternatively, a new line could be added to the policy which acknowledges the challenges in delivering new public transport infrastructure schemes generally, e.g. step-free access and station capacity enhancements.	particular costs associated with it" are express considerations in Local Plan Policies H2, H4, H6 and H7. We believe that these provisions are sufficient to accommodate developments on allocated and unallocated sites that may come forward in association with transport infrastructure. Whilst we consider that a specific reference to Euston is justified in Policy H2 Part C.5 and paragraph 7.50 due to Euston's potential to meet a substantial proportion of the borough's housing and other needs, we do not consider that it would be necessary or helpful to seek to list all sites where transport infrastructure is present and Policy H2 Part B.3 may be applicable. This could potentially apply to a wide range of allocated sites that encompass or sit above or adjacent to transport infrastructure, including S9 (Shorebase Access), S13 (Former Thameslink Station, Pentonville Road), S26 (8 - 10 Southampton Row) and C11 (Network Rail land at Juniper Crescent), as well as C17 (Camden Town over station development).
Area that Policy H2 applies has been amended and now includes this site allocation. Securing housing from a mixed use development on this site will be a significant challenge. Why was the area changed ? The priority for this site should be life science and Knowledge Quarter uses.	We note that 24-58 Royal College Street was allocated as Site 37 in the Camden Site Allocations Local Development Document 2013, indicating that the allocation was for "Redevelopment of the site to provide mixed uses with employment floorspace and new permanent (C3) residential". This allocation relates to the majority of the site now proposed as Allocation S7 in the Local Plan (although the existing allocation excluded the former ATS Tyres at 60-86 Royal College Street). Thus the expectation that this site should provide a mix of uses including housing forms part of an existing adopted local plan policy. In the period prior to preparation of the Camden Local Plan 2017, for those parts of the South Camden sub-area outside the CAZ and for the Town Centre of Camden Town, the highest value uses tended to be residential. The impact of this can be seen on St Pancras Way (which forms the eastern boundary of Allocation S7), where residential uses have been introduced on all the former canalside wharf sites from no.8 to no. 40. Accordingly, one of the aims of the Camden Local Plan 2017 was to protect employment space. However, in recent years, the King's Cross Opportunity Area has been successful in attracting a variety of high value employment uses, including technology businesses, and the Knowledge Quarter has been successfully promoted across an area spanning a 1 mile radius from King's Cross Station, which includes almost all of the CAZ within the borough, the King's Cross Opportunity Area, and a large part of Camden Town. For the majority of sites in the South Camden sub-area, the highest value uses are now likely to be non-residential rather than residential. To reflect this change, we have proposed to extend the area covered by the specific requirements of Policy H2 to encompass the entire South Camden sub-area. We note that policies in the London Plan 2021 and the Local Plan for the CAZ and for the Town Centre of Camden Town will favour non-residential uses, so It will rarely be possible to allocate sites in the South Camden sub-area solely for residential use, and there simply are not sufficient development sites available in the remaining predominantly residential parts of the borough to satisfy housing needs.
The area for the mixed use policy to apply should revert to the CAZ / Central London and Town centre areas as the extension to cover the whole of the south area is not considered justified. Flexibility should be introduced to enable more consideration of the appropriate type and tenure of housing.	In the period prior to preparation of the Camden Local Plan 2017, for those parts of the South Camden sub-area outside the CAZ and for the Town Centre of Camden Town, the highest value uses tended to be residential. The impact of this can be seen on St Pancras Way (which forms the eastern boundary of Allocation S7), where residential uses have been introduced on all the former canalside wharf sites from no.8 to no. 40. Accordingly, one of the aims of the Camden Local Plan 2017 was to protect employment space. However, in recent years, the King's Cross Opportunity Area has been successful in attracting a variety of high value employment uses, including technology businesses,

Main Issues	Councils Response
	and the Knowledge Quarter has been successfully promoted across an area spanning a 1 mile radius from King's Cross Station, which includes almost all of the CAZ within the borough, the King's Cross Opportunity Area, and a large part of Camden Town. For the majority of sites in the South Camden sub-area, the highest value uses are now likely to be non-residential rather than residential. To reflect this change, we have proposed to extend the area covered by the specific requirements of Policy H2 to encompass the entire South Camden sub-area. We note that policies in the London Plan 2021 and the Local Plan for the CAZ and for the Town Centre of Camden Town will favour non-residential uses, so It will rarely be possible to allocate sites in the South Camden sub-area solely for residential use, and there simply are not sufficient development sites available in the remaining predominantly residential parts of the borough to satisfy housing needs. Policy H2 Part A.7 indicates that where the self-contained housing target cannot be met in full, we will prioritise the on-site delivery of affordable housing. Further information is provided in supporting paragraph 7.55.
In the case of a housing emergency, it would be appropriate to secure and maximise any form of housing if it contributes to overall needs, rather than securing only 'permanent self-contained housing'. Policy H2 should be deleted.	Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. Local Plan Policy H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. The priority the Council gives to self-contained housing in the Local Plan reflects the intense competition for the limited supply of land in the borough, from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Due to the acute need in Camden for affordable housing (low cost rent and intermediate housing), and the limited opportunities to secure this from alternative forms of housing, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. Nevertheless Policy H1 also supports 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.
Camden is the only London borough which still has a mixed use policy. It is in direct conflict with the London Plan and NPPF and threatens to undermine the deliverability of commercial development in the borough. Whilst it is acknowledged that Camden is falling short of its annual housing targets and the delivery of self-contained housing is therefore a priority for the Council, we do not consider it appropriate or justified to require housing to be delivered alongside and to the detriment of commercial development in central London as an appropriate or justified strategy for addressing this issue. We therefore do not support Policy H2. Given the importance of the CAZ and Knowledge Quarter to the national economy, we do not consider that any mixed use policy should apply in these areas and therefore question the extension of the application of Policy H2 to the new 'south Camden' area. The Plan should recognise the specialist nature of the Knowledge Quarter developments including science and technology, the strategic objectives for this sector and the challenges that it has in delivering housing. If a mixed use policy is to remain, it should focus on a financial contribution to be used on other council-owned housing developments in the borough rather than requiring housing to be provided on site or off site. The policy could alternatively seek a financial contribution	Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. Local Plan Policy H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies. We consider that this assists rather than harming the borough's commercial attractiveness. We do not consider that Local Plan Policy H2 is in conflict with the NPPF or the London Plan since it provides for all existing non-residential floorspace to be retained or replaced, and provides for 50% or more of the additional floorspace to provide non-residential uses. Part C.4 specially recognises CAZ strategic functions and specialist clusters. Policy H2 incorporates a great deal of flexibility, including flexibility for applicants to make a case for on-site or off-site provision of housing, a reduced proportion of housing, or a payment-in-lieu.

Main Issues	Councils Response
on small to medium-sized schemes proposing increases in floorspace of up to 2,000 sqm, below which it is most challenging to provide the housing as part of a commercial scheme (and for which, under current policy, on site affordable housing is not required). Suggest that the policy is clear that where housing is required under any form of mixed use policy, the council will prioritise the delivery of affordable housing.	We note that Policy H2 does not require housing where less than 200 sqm GIA of additional floorspace is proposed, and provides greater flexibility for off-site provision where less than 1,000 sqm GIA of additional floorspace is proposed. Furthermore, Paragraph 7.60 states that "As part of the consideration of off-site options we will explore with developers whether the housing could be delivered on Council-owned land."
Consideration should also be given to a housing/affordable housing credit system to take account of situations where new housing/affordable housing is delivered by a developer early, or through a portfolio approach to development, and which can then be used to offset any planning requirement generated by a future scheme.	We do not consider that housing / affordable housing credits are a realistic option in Camden, given the high value of land and the lack of any RP portfolio in the borough that could deliver this. It is not considered necessary to change our approach as suggested.
It is stated that off-site housing should be "as close as possible to the application site." However, the opportunity to find an off-site location – particularly in the south of the borough – is rare and, if one is found, the cost of acquiring the site can render many schemes unviable. This is not acknowledged in Paragraph 7.60. Where an off-site solution is proposed, the site selection should be based on whether the site is appropriate to maximise the planning benefits of both the application and donor sites, in the context of the Local Plan.	Paragraph 7.60 of the Plan sets out the approach that the Council will take to seeking off-site provision of housing on an alternative site (or sites) nearby to the application site in question. Paragraph 7.60 clearly states "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." Given this, it is considered that the policy provides sufficient flexibility and no change is therefore considered necessary.
Though it is recognised that policy H2 exists in the current version of the Local Plan, it is less applicable to large-scale masterplans than individual sites. At Euston, it is important that Lendlease and the Euston Landowners can allocate zones of the site purely to commercial uses and retain the flexibility to 'swing' plots from residential to commercial uses without then triggering the need to include an element of housing in a dedicated commercial plot. The policy text should be amended to make it clear that this policy does not apply to individual development zones/development plots within large-scale masterplans. The policy should be amended as follows: "A. Where non-residential development is proposed in any part of the borough, on individual sites rather than within development zones/plots within a large-scale masterplan, 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."	The approach take in Policy H2 makes specific provisions in relation to how the policy should be applied at Euston to allow for a flexible approach to be taken. Paragraph 7.58 of the Plan states that "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." Paragraph 7.69 then goes on to say "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

Main Issues	Councils Response
	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." Therefore, no change to wording is considered necessary.
Part B of policy H2 sets out a number of criteria in considering the target. However, no reference is made to the Indicative Housing Capacities set out in the Site Allocations. Given that the Council has undertaken a design assessment of the site allocations to inform the indicative capacities, this must be reflected in the list of considerations set out under policy H2 part B. Policy should be amended to read - Policy H2 B additional criteria: "9. the Indicative Housing Capacities set out in the Site Allocations".	At the planning application stage the Council will take the indicative site capacities in the site allocations (and all relevant policies) into account when applying H2. No change to wording is therefore considered necessary.

Policy H3 – Protecting existing homes

Number of representations: approx. 4

Representations received from:

- Primrose Hill Conservation Area Advisory Committee
- Kentish Town Neighbourhood Forum
- Highgate Society
- Belsize Society

Main Issues	Councils Response
Welcome the broad policy but deeply regret the continued policy at H3 D.1 which allows single units to be consolidated into larger houses. Object to Policy H3 D1 for the following reasons: - threatens the survival of the most affordable market units in an area like Primrose Hill. Policy H3 D.1 is not consistent with, and undermines, the larger policy of seeking to maximize housing supply - It is not 'sound' and should either be revised to apply only in specific circumstances (as at 7.87) or abandoned.	Policy H3 seeks to resist development that would result in the net loss of homes. However, the Council also recognises that there are situations where the loss of individual homes may be justified, as identified in H3. The net loss of one home is considered to be acceptable when two 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. Furthermore, within a block of flats or apartments, such a change may not constitute development that requires planning permission.
Student accommodation is mentioned as something that should be encouraged and supported and set on the same level as housing for people with care or support requirements. Student accommodation is "considered to be residential floorspace" therefore no housing contribution is required. The StayClub functions more like a hostel than accommodation for students for a full term or an academic year as continuously new groups of teenagers arrive to stay for short periods, with all the attendant disruption for neighbours that this entails.	Comment noted. Local Plan Policy H9 sets out detailed requirements for purpose-built student accommodation, including requirements for a Student Management Plan. If an individual facility is not being managed in accordance with the planning conditions and obligations that apply to it, this is a matter for the Council's planning enforcement service rather than the Local Plan.
Policy H3A This seems to apply across all forms of tenure, but bearing in mind the substantial loss of social rent (3,000 homes) protection needs putting in place to protect social rent. It is felt that Camden should be working to retain not just residential floorspace as a whole, but specifically social rent floor space.	Policy H5 sets out the Plan's approach to protecting affordable housing.
We think there should be strong policies to drive the council towards mechanisms to ensure empty homes are filled in a timely and consistent fashion and short term lets are reduced in favour of longer tenures.	Measures that can be taken to reduce empty homes generally sit outside of the Local Plan. Paragraph 7.19 provides further information. Local Plan policy H1 resists the development of housing for use as short-term lets. The Council has invested significant time and effort to address unauthorised short term lets and take formal enforcement action against any unauthorised changes of use from permanent homes to short term lets. However, our ability to deal with this issue is limited by the powers currently available.

Policy H4 – Maximising the supply of affordable housing

Number of representations: approx. 32

Representations received from:

- Highgate Society
- London Property Alliance
- Lendlease and the Euston Landowners
- Kentish Town Neighbourhood Forum
- YC CFQ Ltd
- Regal
- St George West London Ltd
- General Projects PLC
- Reef and Partners
- UCL
- Land Sec
- Camden YIMBY
- Primrose Hill Conservation Area Advisory Committee
- GLA

Main Issues	Councils Response
Policy H4 A is welcomed - regret that it appears ineffective. We urge the adoption of measures – perhaps contractual terms – to make policies which are strongly supported by communities effective in meeting affordable housing need. We urge the adoption of an effective and thus sound policy.	Support welcomed. The Local Plan must be in general conformity with the London Plan 2021. Consequently, the Local Plan supports the strategic target of 50% set out in London Plan Policy H4, but this must be considered alongside the threshold approach to applications set out in London Plan Policy H5. The threshold approach is included in the Local Plan in Policy H4 part B.5 and explained in paragraphs 7.119-7.120. The 35% threshold will apply to most larger developments involving housing that come forward in Camden. The level of affordable housing agreed when an application is determined is secured by a planning obligation in the form of a legal agreement under S106 of the Town and Country Planning Act 1990 (as amended), however under current legislation the Council cannot prevent a developer from submitting a further application to amend the proportion of affordable housing on the site.
KTNF welcomes the Plan's clear statement that the absolute priority in how to use land in Camden is to create permanent self-contained housing. Furthermore, the Plan supports the London Plan's target that 50% of new homes should be "genuinely affordable". Unfortunately, KTNF is disappointed that this affordable target translates into a mere 26% once viability is considered. Considerations of viability and deliverability tell developers from the outset that 50% does not mean 50%. It means 26%, which is a very disappointing target in a situation where affordable housing is desperately required.	Support welcomed. The Local Plan must be in general conformity with the London Plan 2021. Consequently, the Local Plan supports the strategic target for 50% affordable housing set out in London Plan Policy H4, but this must be considered alongside the threshold approach to applications set out in London Plan Policy H5. The threshold approach is included in the Local Plan in Policy H4 part B.5 and explained in paragraphs 7.119-7.120. The 35% threshold will apply to most larger developments involving housing that come forward in Camden. For smaller sites, lower targets will apply in accordance with Local Pan Policy H4 part B.4. An absolute target of 50% affordable housing regardless of viability would not be effective or deliverable and would not satisfy the tests of soundness for Local Plans set by the NPPF.
For clarity, low-cost rented is the cheapest, also called social rent, owned by councils and housing associations, with access controlled by the housing allocation scheme, and subject to national rent setting guidance. Intermediate is the next cheapest, lower than market rent and controlled by income caps in the London Plan.	Comment noted.
NPPF Paragraph(s) Breached 65, Remove <10-unit contribution or provide robust local viability evidence and rural-area exemption justification.	As acknowledged in paragraph 7.108 of the Local Plan, the NPPF advises that affordable housing should only be sought from major developments involving housing. However, the Inspector examining the Camden Local Plan 2017 found that local departure from the national approach was appropriate in the light of the scale of affordable housing need in the borough. The Council intends to present evidence through the examination of this Local Plan to demonstrate that this departure from national policy continues to be appropriate in the particular local circumstances of Camden.
Camden states in Policy H1 that it will be supporting the London Plans' target of 50% affordable housing. There are a number of issues with this policy, namely:	The Local Plan must be in general conformity with the London Plan 2021. Consequently, the Local Plan supports the strategic target of 50% set out in London Plan Policy

Main Issues	Councils Response
- In this Policy Camden states their target for affordable housing is 3,000. As a percentage of the 11,500 target stated in H1 above, this works out at 26%. Clarification is required. - Those who work within the housing delivery sector are aware that the proportion of affordable housing in only very rare cases reaches the targets set either at regional or local level. Viability assessments, largely due to rising construction costs, are regularly producing figures of 10% and lower and rarely make even 20%. - There is then the problem of the split between social/London affordable rent and intermediate rent, Camden are stating a 60/40 split. Is this achievable? - The flexibility of provision for small developments is welcomed, but small scale, non-professional developers often struggle with the complexities of the current planning system. More support for this sector should be given. - In terms of mix of affordable housing, the use of this description for intermediate provision can be misleading.	H4, but this must be considered alongside the threshold approach to applications set out in London Plan Policy H5. The threshold approach is included in the Local Plan in Policy H4 part B.5 and explained in paragraphs 7.119-7.120. The 35% threshold will apply to most larger developments involving housing that come forward in Camden. Furthermore, lower proportions of affordable housing are sought from relatively developments with capacity for 15 or fewer additional homes, as set out in Policy H4 Part B.4. The target to deliver 3,000 additional affordable homes over the Plan period is our assessment of the expected outcome of the application of Policy H4 across a spectrum of developments of different sizes. The 3,000 home target needs to be effective and deliverable to satisfy the tests of soundness for Local Plans set by the NPPF.
H4D Alternative forms of tenure. Whilst shared housing and build to rent are welcome as providing diversity in the housing market, student housing is not.	The Local Plan is required to be in general conformity with the London Plan. The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year. Accordingly the Local Plan proposes that 5.7% of this need (200 bedspaces per year) should be met in Camden, in line with the proportion of London's full-time 18+ students currently living in the borough. 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. The Council considers that the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market. The provision of higher education and research significantly contributes to Camden's ambition for its local economy to be strong, sustainable, and inclusive.
Policy should be clearer regarding payment in lieu.	General support for Policy H4 welcomed. Local Plan paragraph 7.110 (supporting Policy H4) states 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)." We are aware that there is a challenging financial environment for many Registered Providers that might formerly have acquired the affordable homes delivered as part of a market-led development, but we note that there are still a number of relatively small Registered Providers operating in the borough that are content to acquire a limited number of affordable homes within a larger development. In 2023/24 we were able to deliver three affordable homes (low-cost rent) at 115-119 Camden High Street alongside a hotel development (2019/3138/P), two affordable homes (low-cost rent) at 50 Tottenham Street alongside eight market homes and an expanded office block (2017/4306/P), and four affordable homes (low-cost rent) at 5 Liddell Place alongside 62 market homes and two further blocks providing market housing and workspace. We accept that there will be circumstances where sites with capacity for 10-or-more additional homes can best make an affordable housing contribution in the form of a payment-in-lieu, but do not consider that this warrants further flexibility within Policy H4. NPPF Paragraph 64 indicates that affordable housing requirements generally should be met on-site, whilst Policy H4 Part B in the London Plan 2021 states "Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances."
Support the reference to referrals to the Mayor in para 7.119	Support welcomed.

Main Issues	Councils Response
Object to the 50% target	Noted. The Local Plan must be in general conformity with the London Plan 2021. Consequently, Local Plan Policy H4 Part A indicates that the Council supports the strategic target of 50% set out in London Plan Policy H4, but this must be considered alongside the threshold approach to applications set out in London Plan Policy H5. The threshold approach is included in the Local Plan in Policy H4 part B.5 and explained in paragraphs 7.119-7.120. The 35% threshold will apply to most larger developments involving housing that come forward in Camden. Furthermore, lower proportions of affordable housing are sought from relatively small developments with capacity for 15 or fewer additional homes, as set out in Policy H4 Part B.4.
Remove the reference to applying an alternative approach to affordable housing for build to rent as not consistent with regional policy	We do not agree that is necessary to remove the option for developers of Build to Rent housing to provide the forms of affordable housing sought by Policy H4. We consider that Policy H4 Part D and supporting paragraph 7.145 make it clear that the Council will support proposals that contribute to affordable accommodation in accordance with the London Plan provisions, but as an alternative will strongly encourage contributions in accordance with the guideline mix in Policy H4 Part B. We note that the GLA have not objected to this aspect of the proposed Policy H4, or raised it as a general conformity issue.
Support the recognition of applying the latest London plan thresholds, but think Camden should go further and determine their own thresholds	Disagree that setting Camden-specific thresholds would be appropriate. The Local Plan must be in general conformity with the London Plan 2021. We consider it unlikely that the GLA would be content to accept a plethora of different thresholds across London as being in general conformity with the London Plan, and we struggle to see how a multiplicity of different thresholds would assist the development industry. We further note that the London Plan is currently being reviewed, and may well result in new London-wide viability thresholds. Once any new London Plan viability thresholds are published in their final form, these would supersede any Camden-specific viability thresholds we might set in Local Plan. The GLA is aiming to publish the new London Plan in its final form in 2027/28 (following examination in public), consequently any Camden-specific viability thresholds we might set would only be in effect for a very limited period.
Object that shared ownership is not accepted as an appropriate intermediate housing product which is inconsistent with London Plan policy H6	Paragraph 7.123 does not seek to prohibit shared ownership, but it does strongly encourage the provision of homes for intermediate rent. If the market values for a site are at a level low enough for shared-ownership to be affordable within the London Plan gross annual household income cap of £90,000, the Local Plan would not prevent favourable consideration of shared-ownership, subject to satisfying the provision in paragraph 4.6.9 of the London Plan 2021 that "Boroughs should seek to ensure that intermediate provision provides for households with a range of incomes below the upper limit". We note that the Mayor's Affordable Housing and Viability SPG 2017 states that "Generally shared ownership is not appropriate where unrestricted market values of a home exceed £600,000". HPI data from the Land Registry at September 2025 indicates that throughout the year 2024/25, average Camden prices across all property types exceeded £800,000, and average Camden prices for flats and maisonettes (the cheapest category) exceeded £670,000.
Object to the continued approach of self contained affordable housing as the preferred tenure mix. Should allow the affordable element of build to rent scheme to be delivered as discounted market rent.	We do not agree that is necessary to remove the option for developers of Build to Rent housing to provide the forms of affordable housing sought by Policy H4. We consider that Policy H4 Part D and supporting paragraph 7.145 make it clear that the Council will support proposals that contribute to affordable accommodation in accordance with the London Plan provisions, but will as an alternative will strongly encourage contributions in accordance with the guideline mix in Policy H4 Part B. We note that the GLA have not objected to this aspect of

Main Issues	Councils Response
	the proposed Policy H4, or raised it as a general conformity issue.
Add to the end of sentence: “where viable and supported by a Registered Provider for the low-cost rented element”.	We do not support the proposed change, which potentially confuses the purpose of paragraph 7.214. Paragraph 7.214 begins with the statement "For low-cost rented housing (homes for Social Rent and London Affordable Rent), our high priority need is for large homes with 3 bedrooms." Consequently, there is always an expectation that large homes for Social Rent and London Affordable Rent will be included in developments involving affordable housing. What paragraph 7.214 is recognising is that "For market homes, there are high priorities amongst small and large homes", and that it may be possible to forego the large market homes whilst still complying with Policy H7 Part B. The Council's SPD "Camden Planning Guidance: Housing" (adopted in 2021) strongly promotes early involvement of a Registered Provider of affordable housing in Section 3 (which includes the sub-heading "Early involvement of a provider approved by the Council"). However, we do not consider that a reference to support by a Registered Provider is warranted in a sentence intended to provide for large market homes to be omitted from a development.
Policy should be clearer about when payment in lieu will be acceptable or provide criteria for it to be assessed against making the policy more specific and effective.	We do not agree that greater clarity is needed in relation to payments-in-lieu of affordable housing. In connection with Policy H4, paragraph 7.110 indicates 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), while Policy H4 Part B.2 indicates that development capacity will be assessed on the basis that 100sqm (GIA) of housing floorspace creates capacity for 1 home. Consequently, there is flexibility for a payment-in-lieu of affordable housing where a residential development would involve less than 1,000 sqm of additional housing floorspace. In connection with Policy H2, paragraph 7.54 indicates that 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. This is clearly consistent, since a total of 2,000 sqm of additional floorspace (including non-residential space) would be expected to provide 1,000 sqm of additional housing floorspace.
Regal supports aim of Policy H4, and welcomes clarification regarding Part B 5. The clarification in Part B (7) that affordable housing will be assessed against both the proposed housing floorspace and the proposed number of habitable rooms is also welcomed.	Support welcomed.
• Support for draft Policy H4 – Maximising the supply of affordable housing, aligning with the London Plan. • Maximising affordable student accommodation will help to meet the increasing demand for such units.	Support welcomed. Comment noted.
• The Council's Whole Plan Viability Assessment (WPVA 2025) has not responded to impacts of significant build cost inflation, registered provider and financial constraints. Following a format which fails to meet the NPPG, and the unintended consequence of supporting 50% affordable housing, which is clearly not deliverable. • Given the significant divergence from the 50% affordable threshold promoted by the Local Plan, the threshold of 50% in Policy H4 should be revised. • The NPPF expects plans to be ‘be prepared positively, in a way that is aspirational but deliverable’, but there is no evidence to support a 50% threshold as a deliverable and sound threshold, resulting in it being a misleading figure when included in a local plan.	The London Plan’s Strategic Target is 50% with the threshold approach being 35%/50% dependant on the site in question. This target has been in place historically in Camden for a long time given the acute housing need in the Borough. This is emphasised by Para 7.14 of the Plan which states “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’s policies respond to this, seeking to “maximise the supply” of both self-contained housing and affordable housing. Given the acute need for affordable housing in the Borough this is a reasonable approach for the Council to take to ensure every site does what it can whilst being able to be delivered in the Borough. We will however continue

Main Issues	Councils Response
	to apply both the London Plan and Camden's policies on a flexible basis i.e. affordable housing is sought to be negotiated, and this includes consideration for the London Plan's threshold viability approach which identifies that sites that deliver less than 35% (on certain sites) have to go through the viability tested route. We note that the Applicant went through the viability tested route in their 2018 application with the agreed position being 39% AH by habitable room circa 34% by area and 32% by no units.
Seeking to apply the London Plan's strategic affordable housing target in a site-specific way is an incorrect interpretation of Policy H4. It is also unclear how this would work. Draft Policy H4B5 should be amended to remove the reference to the strategic housing target.	We note that the comment refers to the site specific application of the strategic target rather than the reference to the London Plan's strategic target in Local Plan Policy H4 Part A. We consider that strategic target is relevant to site-specific negotiations in two ways. Firstly, developers are expected to explore whether affordable housing can be increased beyond the viability threshold level using grant from the Affordable Homes Programme (London Plan Policy H4 Part A.2 and Policy H5 Part C.4 and paragraphs 4.4.4 and 4.5.11). Secondly, developments are subject to Early Stage Viability Review (Fast Track Route and Viability Tested Route) and Late Stage Viability Review (Viability Tested Route only) (London Plan Policy H5 Parts E and F.2 and paragraphs 4.5.8 and 4.5.14). We consider that the strategic target has a role in the operation of these Viability Reviews, since the proportion of affordable housing sought would otherwise be open-ended. We acknowledge that the purpose of the reference to the strategic target in Local Plan Policy H4 Part B.5 may not be entirely clear, and needs to be read in the context of supporting paragraph 7.120 and the relevant sections of the London Plan.
Raise significant concerns that seeking affordable housing below 10 units is unlikely to support small builders and diversify the housing market. Overall, this is likely to be counter-productive in terms of both housing delivery and affordable housing delivery.	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. 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. We note that footnote 50 to London Plan indicates that "All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites", although London Plan Policy H2 itself makes no comment on affordable housing. During the preparation of the Submission Draft Local Plan, Council officers discussed this matter with GLA officers, and devised the wording of Policy H4 to reflect our understanding of the GLA position. We also provided much of the evidence presented to the examination of the Camden Local Plan 2017, which included evidence that the scale of developments can be suppressed where there is an abrupt threshold at which the full affordable housing requirement applies. We do not consider that seeking modest financial contributions from small housing developments will harm housing delivery from small developments or by small-scale builders, and do not consider that it would harm affordable housing delivery. We consider that our

Main Issues	Councils Response
	approach will lead to the optimal quantum of housing on small sites, rather than encouraging developers to suppress the quantum of development so that it falls below 1,000 sqm/ 10 homes. If affordable housing contributions from developments with capacity for 1-9 additional homes could no longer be sought, while the affordable housing target proposed by Local Plan Policy H4 for developments with capacity for 10-15 additional homes is below the full quantum sought by the London Plan Viability Thresholds, the affordable housing target may still be so high as to suppress delivery below 1,000 sqm/ 10 homes.
In terms of seeking affordable housing contributions for development schemes delivering 10 to 15 units, whilst the approach set out in the draft Policy differs from LP2021, given it is likely to promote small builders and reduce the 'cliff edge' impacts, it is considered to be an appropriate flexibility.	We have concerns that if affordable housing contributions from developments with capacity for 1-9 additional homes could no longer be sought, although the affordable housing target proposed by Local Plan Policy H4 for developments with capacity for 10-15 additional homes is below the full quantum sought by the London Plan Viability Thresholds, it may still be so high as to suppress delivery below 1,000 sqm/ 10 homes.
It is noted that there are references to tenure split being applied flexibly within the supporting text of the policy. Tenure mix is a policy criterion for viability assessments; therefore, it is recommended that this wording is removed.	We note that a measure of flexibility in the tenure split is inevitable, since the proportion of housing in each tenure will be assessed on the basis of floor area and/ or habitable rooms, but a development will be designed to provide a whole number of appropriately sized homes in each tenure. We further note that the Policy H6 of the London Plan 2021 gives discretion to the boroughs to choose between low-cost rent and intermediate tenures for 40% of the affordable housing, and is only prescriptive that there should be a minimum of 30% low-cost rented housing and a minimum of 30% intermediate housing. The London Plan 2021 also refers to flexibility over the tenure split in paragraphs 4.5.10 (for schemes with a high proportion of affordable housing), paragraph 4.6.11 (for schemes delivering more than 35% affordable housing) and paragraph 4.6.12 (for schemes assessed under the Viability Tested Route). On that basis, we consider this aspect of the Local Plan to be consistent with the London Plan.
Draft Policy H4B(8) - this should be supported by evidence to ensure deliverability.	Noted. The Council has commissioned an assessment of the viability of large-scale schemes including affordable housing for people with care or support requirements to supplement the Camden Local Plan Viability Study 2025.
Draft Policy H4(E7) - viability should be tested at plan making stage and viability assessments should not generally be expected at application stage unless a scheme proposed a noncompliant level of planning obligations i.e. lower level of affordable housing, which is already covered in Part B of the same policy.	Local Plan Policy H4 Part E.7 will not apply to schemes that satisfy the London Plan's viability thresholds, but will apply to all schemes that follow the Viability Tested Route. We consider that limiting discussion of viability in Policy H4 to the reference in Part B.4 to the London Plan's viability thresholds would make it very difficult for third parties to understand the policy without also referring to the London Plan.
It is recommended that the policy wording within draft Policy H4(F) is clearer on what the triggers are for viability reviews. If the triggers are in line with the London Plan, then it is questioned whether it is necessary to replicate this policy within the draft Plan	The Local Plan does not seek to depart from the London Plan in relation to the triggers for viability reviews. This is confirmed by supporting paragraph 7.155. The aim of the drafting was to find a suitable balance between a Local Plan policy that can be understood in its own right (without constant reference to the London Plan), and a policy which duplicates large parts of the London Plan.
Policy H4 (Part D) seeks to apply the affordable housing provisions of the London Plan for build-to-rent (BTR) housing, PBSA and large-scale purpose-built shared living, but as an alternative will strongly encourage contributions of on-site affordable housing. The recognition of London Plan policy requirements around these tenures and the flexibility introduced in this policy are welcomed.	Support welcomed.
As with the current Plan, there is support for innovative intermediate housing products that can be made affordable to a wider range of groups in Camden and the introduction of policy support for large-scale purpose-built shared living in line with the London Plan is welcomed and supported.	Support welcomed.

Main Issues	Councils Response
The draft Plan includes a new section on BTR and states that the council will be flexible in the application of affordable housing and dwelling size policies to the development of BTR housing where it considers such housing will help to create mixed, inclusive and sustainable communities. We support this flexibility.	Support welcomed.
The draft Plan acknowledges that additional student accommodation contributes not only to the student housing target but also to the overall housing target, addresses a permanent housing need and can reduce the pressure for students to share existing large homes. This introduction is supported and welcomed.	Support welcomed.
Accept that the Local Plan must be in accordance with the London Plan, but we have made recommendations to the London Mayor through the 'Towards a New London Plan' consultation that there should be an easier and streamlined approach to achieve fast-track compliant proposals for sites like Euston. Policy H4 needs to acknowledge the difficulties that can be experienced on public sector land, where there are often significant abnormal costs to unlock the development potential which heavily influence the viability of sites like Euston. Policy H4 should offer greater flexibility in terms of affordable products, which complement wider development objectives We therefore suggest the following wording is introduced to Policy H4: "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: 12. <u>In the case of public sector land, consideration will be given to a range of affordable housing products, including those which are bespoke to the development that is proposed;</u> "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: 8. <u>the economics and financial viability of development on public sector land where this involves extraordinary enabling costs;"</u>	The Local Plan must be in general conformity with the London Plan 2021. Consequently, the Local Plan supports the strategic target of 50% set out in London Plan Policy H4, but this must be considered alongside the threshold approach to applications set out in London Plan Policy H5. The threshold approach is included in the Local Plan in Policy H4 part B.5 and explained in paragraphs 7.119-7.120. The 35% threshold will apply to most larger developments involving housing that come forward in Camden. The London Plan supports two broad categories of affordable housing, lowcost rented housing and intermediate housing. 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. This will however be applied flexibly taking into account the provisions in Policy H4. Further information on why other affordable housing products aren't appropriate in the London / Camden context is set out in the supporting text to Policy H4 and 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
Support draft Policy H4 which reflects the London Plan's strategic target for 50% of London's new homes to be genuinely affordable.	Support welcomed.

Policy H5 – Protecting and improving affordable housing

Number of representations: approx. 5

Representations received from:

- Primrose Hill Conservation Area Advisory Committee
- Camden YIMBY
- Highgate Society

Main Issues	Councils Response
Policy H5 is welcomed - strongly urge a more effective policy in respect of protecting 'key-worker accommodation, such as nurses' homes and hostels'. Proposed policy needs to be made effective and the larger plan sound.	Support welcomed. We note that there are limits to the effectiveness of this policy because: (1) affordable housing does not have a specific planning "Use Class"; and (2) not all affordable housing is secured by a legal agreement. Newly developed affordable housing is secured by a planning obligation in the form of a legal agreement under S106 of the Town and Country Planning Act 1990 (as amended), however affordable housing secured some years ago may not

Main Issues	Councils Response
	benefit from this protection. Consequently, the Council may not always be able to prevent affordable housing from being converted to other forms of housing that fall within the same "Use Class".
NPPF Paragraph(s) Breached 125 (a) and (c)Insert minimum-density expectations for estates; require net increase in social-rent units plus additional market rate homes.	Local Plan Policy H1 indicates that we will seek to meet or exceed the Plan's housing targets through a number of mechanisms, including optimising the homes delivered on each site by using a design-led approach (Part B.7). Supporting paragraph 7.31 indicates that, as a broad guideline, 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). In addition, existing estates where additional housing delivery is expected within the Local Plan period are allocated within the Local Plan, and an indicative housing capacity figure is provided in the Local Plan for each site. Policy H5 of the Local Plan relates to "Protecting and improving affordable housing", and indicates in Part D that we expect 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). Consequently, all existing low-cost rented housing (including social rented housing) should be retained or replaced, and additions to it should be maximised.
Whilst policies are in place to protect Camden's affordable housing from loss from other sources, it is completely silent on the losses through "Right to Buy". This is now recognised as the major cause of loss of affordable units throughout the country.	Comment noted. The Local Plan is not able to amend or influence national policy on the sale of Council homes.
Through the Community Investment Programme existing homes, many in social rent will be demolished. The Society has major concerns as to what this will do to the cohesion of established communities particularly in large schemes and the distress this will cause to the residents, particularly those who have lived in their properties for lengthy periods and look on these as lifetime homes. it is not sustainable in terms of embodied energy and impact on communities, and the Society feels retrofit should be prioritised with a Whole Life Cycle costing carried out.	The Community Investment Programme adopts a mixed approach to estate regeneration. Retrofit is adopted where it can create high-quality and sustainable homes with a long life-span at an affordable cost, whereas demolish and re-build is adopted where buildings have major structural problems and/ or cannot be refurbished to create homes of sufficient quality at an affordable cost. For example, the Holly Lodge Regeneration project south of Highgate (completed 2021) was a wholly retrofit scheme delivering 85 new homes in existing buildings, while the Agar Grove Estate Regeneration project has involved the phased demolition of 112 homes, but will also involve construction of over 300 new-build homes (220 completed by March 2025) and the retrofit around 140 homes at Lulworth Tower. Estate regeneration proposals are subject to extensive resident engagement and consultation, including a resident ballot. The Community Investment Programme has its own dedicated website - https://cip.camden.gov.uk/home - which provides an overview of delivery since the start of the Programme, progress on individual projects, and a series of annual reports available at the end of this page - https://cip.camden.gov.uk/facts-and-figures .
H5D. The concern with this policy is that regeneration will result in very few if any additional genuinely affordable units of housing following the viability assessment as stated above whilst causing immense damage to existing communities whilst putting great pressure on existing infrastructure and services.	Comment noted. Although in some instances the number of additional affordable homes delivered by regeneration schemes may be relatively small, such schemes may provide vastly improved housing for occupiers.

Policy H6 – Housing choice and mix

Number of representations: approx. 6

Representations received from:

- Canal and River Trust
- Land Sec
- Regal
- Highgate Society

Main Issues	Councils Response
Suggest Policy H6 is amended to read “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 Canal & River Trust’s London Mooring Strategy.”.	Para 7.198 of the Local Plan (which supports Policy H6) briefly summarises the role of the Canal and River Trust, indicates that it published the London Mooring Strategy, and comments on its guidance in relation to the Regent's Canal. It is not considered necessary to identify the Canal and River Trust as the author of the London Mooring Strategy within Policy H6 itself.
Generally welcomed but, as above, too many developments are produced with a majority of small units which are not suitable for family accommodation. Much of this can arise from alternative forms of tenure such as student housing (as below) or shared living. Where there is a predominance of units of this size proposed the mix of the rest of the site should be adjusted to better reflect need.	We do not consider that on sites where there is an element of student accommodation or shared-living that an increased proportion of family homes should be required on the remainder of the site. There is no reason to suppose that the creation of specialised housing to meet the specific needs of students and young adults would increase the need for family housing on the rest of the site. Increasing the proportion of family homes above the proportion sought by Local Plan Policy H7 and supporting text could reduce development viability to the extent that self-contained homes do not come forward.
Want reference to the discount market rent acknowledged here to be consistent with regional policy and so want reference to London Plan. Suggested amended wording 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. <u>The Council will apply the distinctive affordable housing provisions of the London Plan, including the provisions for homes for Discount Market Rent, but will still allow As set out in the paragraph above and in Policy H4 Part D, the Council strongly encourage 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.</u> 7.188 Where a developer opts to provides affordable housing in the form of homes for Discount Market Rent and London Living Rent, <u>in accordance with the London Plan</u> , 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”.	We do not support the proposed change, which would effectively promote the London Plan approach of seeking Discount Market Rent ahead of the Council's preferred tenure mix. Paragraph 4.11.4 of the London Plan 2021 confirms that Discount Market Rent can be considered as a form of intermediate rent. Whilst paragraph 4.11.4 states the Mayor's preference for such homes to be let at London Living Rent levels, London Plan 2021 Policy H11 Part C only sets an expectation that 30% should be at London Living Rent levels, allowing the rest to be "at a range of genuinely affordable rents". The London Plan is not clear about the meaning of genuinely affordable, but we note that the NPPF (Annex 2: Glossary) definition of Affordable Housing allows homes for Affordable Private Rent to be priced "at least 20% below local market rents". The Camden Local Housing Needs Assessment May 2025 (LHNA) indicates that, assuming a supply of 10,350 dwellings over the Plan period (after allowing for student and care home accommodation), 6,287 homes will be needed for social rent (or London Affordable Rent), compared with 1,276 homes for intermediate rent. This is broadly consistent with the 60%-40% guideline split included in Local Plan Policy H4 Part B.6. The provision of 100% of affordable housing in the form of Discount Market Rent, which can be considered as a form of intermediate rent, would be a much less effective contribution to meeting the affordable housing need identified by the LHNA, particularly if this was to form 100% of the affordable housing on one or more of the borough's largest housing sites. We note that the London Plan is currently being reviewed, and the GLA is aiming to publish the new London Plan in its final form in 2027/28 (following examination in public). Given the potential for significant changes to the London Plan by 2027/28, the Council is seeking to avoid duplicating large sections of the London Plan 2021 within the Local Plan.
Regal support the Policy H6 aspirations to create mixed, inclusive, sustainable and multi-generational communities. However, within Part B (6) of the policy, reference to the delivery of PBSA, as being able to assist in the creation of mixed, inclusive and sustainable communities has been	This is now covered in Policy H10 Housing with shared facilities (including large scale purpose built shared living) which states that ...The Council will support development of housing with shared facilities provided that the

Main Issues	Councils Response
removed in the Regulation 19 version of the plan. Regal would request that PBSA is explicitly referred to this in policy, alongside build to rent developments.	development: contributes to creating a mixed, inclusive and sustainable community;
Support the inclusion of the build to rent section and approach that this could help meet the overall housing output and how this type of housing supports a wide range of people. Support the flexibility in applying affordable housing requirement where this will help create mixed, inclusive and sustainable communities.	Support welcomed.
It is important that a reasonable portion of all new homes are genuinely affordable to those living and working in the area. That is not currently the case as market sale homes are beyond the reach of many, especially those on average incomes who also do not qualify social rent. Policy H6 -C. stronger support for Community Led Housing is needed, as this new and growing sector has the potential to contribute additionality to the housing supply if supported in policy such as the London Plan and Local Plans. For instance, NW3 Community Land Trust is currently bringing forward a development in NW3 area consisting of 14 new flats, 8 of which affordable including 2 for Social Rent.	The Local Plan seeks to maximise the provision of affordable homes as set out in Policy H4 Maximising the supply of affordable housing. Proposals for community-led housing consistent with the Plan's housing policies would be supported.

Policy H7 – Large and small homes

Number of representations: approx. 4

Representations received from:

- Land Sec
- General Projects
- Regal

Main Issues	Councils Response
The retention of flexibility in dwelling mix at draft policy H7 is supported, particularly as in retrofit scenarios it is not always possible to achieve a variety of dwelling sizes.	Support welcomed.
Welcome and support the changes made to Table 9	Support welcomed.
Support for the Regulation 19 updates to the Dwelling Size Priority Table in relation to H7. It is reassuring that the Dwelling Size Priorities Table will be applied flexibly. However there is concern for the requirement to test viability by independent assessor. This approach is not considered to be appropriate because of the relatively loose 'dwelling size priority' approach which does not set specific percentage targets for different unit sizes / tenures, making it challenging to identify what level of deviation would result in the need for viability testing. And due to negative impacts on pre-app/ decision making. As such we propose the following change to Policy H Part D (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 ";	Support welcomed. 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. We consider the wording to be appropriate and to reflect current practice. No change is considered necessary.

Policy H8 – Housing for older people, homeless people and other people with care or support requirements

Number of representations: approx. 4

Representations received from:

- GLA
- Life Care Residences Ltd

Main Issues	Councils Response
General support for revisions to draft Policy H8, particularly the boroughs support for a variety of specialist housing.	Support welcome
Draft Policy H8 notes that market-led care homes should be provided at costs consistent with the North Central London minimum sustainable bandings or provide a proportion of places for Council funded residents at sustainable costs.	Comments noted
Understanding the demand for care homes and the need to ensure supply for varying demographics. There is concern that the policy suggests a dictation in costs, which can be charged to residents, without providing an evidence base for rental levels. Cost controls are of concerns due to: • Data transparency, • Validity of proposed bandings, • Implications for development appraisals, • Lack of opportunity for viability review, • Lack of detail regarding calculation and enforcement. The proposals are not in accordance with the London Plan 2021 and due to the lack of transparency and supporting information it is recommended that this element is removed from the draft policy.	We consider that the approach taken in the Local Plan is aligned with the London Plan 2021. 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 consider it to be justified to 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. These are regularly reviewed across the North Central London authorities, and reflect what the Council can sustainably pay to provide funding for care home residents.
The draft Plan should establish what the need is for specialist older persons housing. In the absence of a figure of need, LBC should rely on the Mayor's indicative benchmark figure which is set out in Table 4.3 of LP2021. LBC should work in collaboration with providers to identify sites which may be suitable for specialist older persons housing.	The Local Plan includes the Mayor's indicative benchmark figure of 105 additional homes per year in paragraph 7.258, which supports Local Plan Policy H8 Housing for older people, homeless people and other people with care or support requirements. We note that that the London Plan indicates that the benchmarks should inform local level assessments, and that boroughs should plan pro-actively to meet identified need, but does not suggest that the benchmarks should be included in Local Plan policies. As indicated in Local Plan Policy H8 Part B, and supporting paragraph 7.235, the Council's approach to people with care or support requirements (including older people) is to provide "floating" care and support and adaptations that enable them to live independently and safely in their own homes, whilst also acknowledging that a proportion will require suitable specialised housing. A summary of the anticipated need for specialised housing for older people provided on behalf of the Council is set out in Local Plan paragraphs 7.239 to 7.242, and we will seek to meet this through the application of Policy H8 Parts D and F. We anticipate that the need for market provision will be met through the application of Policy H8 Parts E and F. The allocated use for two Site Allocations includes a specialist care homes (W7 Gondar Gardens Reservoir, and N2 Former Mansfield Bowling Club). The potential to include housing for older people or other people with care or support requirements is also identified for Site Allocations S5 (120–136 Camley Street), S6 (104–114 Camley Street and Cedar Way Industrial Estate), S7 (24-86 Royal College Street), C2 (Regis Road and Holmes Road depot), C10 (Juniper Crecent), C12 (Gilbeys Yard), C13 (West Kentish Town Estate), C15 (Wendling Estate and St Stephens Close), and W2 (O2 Centre, car park, car showrooms and 14 Blackburn Road), whilst Site Allocation C3 identifies potential inclusion of Extra Care housing (self-contained housing with some communal facilities, designed to enable provision of additional care as occupiers' needs increase).

Policy H9 – Purpose built student accommodation

Number of representations: approx. 44

Representations received from:

- University of London
- UCL
- Land Sec
- General Projects Ltd
- Places for London (Network Rail)
- Transport for London
- Regal
- Kentish Town Neighbourhood Forum
- Unite Group PLC
- Kilburn and District Properties
- Joseph Homes
- Highgate Society
- Highgate Conservation Area Advisory Committee

Main Issues	Councils Response
Our comments made in response to the Regulation 18 consultation remain valid. For clarity, para. 7.299 should be modified to state, <u>'Funding A contribution towards public transport and other services may be sought through planning obligations as appropriate where there is deemed to be insufficient capacity or connectivity.'</u>	Further details of the Council's approach to securing planning obligations to support transport projects is set out in the transport policies in the Plan and in the Delivery and Monitoring chapter. No additional wording is considered necessary under policy H9.
Applicants should consider the Secured by Design principles and guides What Local Plan stipulates is open to interpretation and value engineering - omitting security rated products in favour of cheaper and inferior product can severely compromise the security of a building or development Consultation with the local design out crime officer is essential It is often the case that a developer will look to achieve a BREEAM award where security is far from the main focus. To satisfy BREEAM's security component, a security needs assessment (SNA) is often conducted but the applicant only needs to attempt contact with the Designing Out Crime Officer to satisfy this element. This can mean that crime prevention advice can be absent from the design and build phases. Suggest having a condition for developments to achieve a minimum of Silver SBD award (minimum Bronze for refurbishment and where conservation issues exist) Approved documents do not go far enough in terms of security to mitigate the potential crime risk faced by inner London boroughs. Having infrastructure that has been conditioned to achieve SBD can lead to a reduction in calls for the police. It also has a significant impact on anti-social behaviour. Need to deploy well researched and effective design solutions.	Comments noted. These are matters regarding the implementation of the policy which we consider are more suitable for inclusion in the relevant supplementary planning guidance (Camden Planning Guidance on Design). We will consider them when we update the guidance.
Until very recently, student accommodation has been developed free from the application of any affordable housing requirements (section 7.316), but from now on the contribution from purpose-built student accommodation is to take the form of affordable accommodation although it is not specified how much is called for.	As set out in Local Plan paragraph 7.310, the London Plan's threshold approach to affordable housing applies to student accommodation. The 35% threshold will apply to most larger developments involving student accommodation that come forward in Camden.
Student Housing is dealt with as a separate policy from other forms of shared tenure covered in Policy H4. The Society strongly believes that this is a sector of the housing market should not be supported for the following reasons: - The GLA requirement of 3,500 units of student housing per annum is out of date. - Since 2021 there have been a steady drop in numbers of HE students thus creating financial problems within this sector. - The 2021 target figure of the provision of 3,500 units per annum has been considerably exceeded. - Camden maintain that the enormous overprovision over and above the target set within the London the Plan	We have seen no evidence that the number of Higher Education students in London has diminished significantly, and there has not been an excess provision of new student accommodation in Camden. Over the 5 years from 2016-21, 756 beds were delivered in student housing in Camden, but 533 were lost leaving a net gain of 161. Since 2021, 17 additional student beds have been delivered. The Camden Local Plan 2017 target is 160 additional student accommodation places per year. The Local Plan is required to be in general conformity with the London Plan. The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year. This figure remains in force until it is replaced in the next London

Main Issues	Councils Response
indicates that this market is picking up after a steady decline, but this is driven more by profitability of this form of development than by demonstrable need. - The construction of student housing takes up valuable land which could otherwise be used for self-contained housing units to meet demand. - It skews the affordable housing percentage as this is assessed on the residue of the site excluding the student housing. This gives a false picture of percentage of affordable housing being met. - It also skews the mix. - This is a profitable sector for developers with a 4% tax rebate, exemption from other requirements including affordable housing, provision of amenity space and reduced building regulations requirements. - The cost of accommodation in these blocks is extortionate and unaffordable for any other than the most wealthy. - Should the student housing, in future times prove uneconomic, the owner could convert these into substandard residential units, possibly through Permitted Development Rights. The Council should ensure a legal agreement is in place to prevent this.	Plan. Accordingly the Local Plan proposes that 5.7% of this need (200 bedspaces per year) should be met in Camden, in line with the proportion of London's full-time 18+ students currently living in the borough. Students aged 18 or over make up around 11% of Camden's population, consequently we consider it reasonable and appropriate that a proportion of the land available for housing in Camden should provide student accommodation. 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. The Council considers that the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market. We note that some of the student accommodation being provided in Camden and other parts of London commands high rents compared with the cost of a room in a shared flat or house. However, in line with the London Plan 2021, Local Plan Policy H9 will require development of new student accommodation to include a proportion of affordable accommodation at rents that can be met by students reliant on the government's maintenance loan for living expenses, or otherwise to provide 'conventional' affordable housing in line with Local Plan Policy H4. We further note that developer of the two student accommodation schemes most recently approved in Camden has chosen to provide 'conventional' affordable housing - Chalk Farm Road (C9) and Arlington Road/ Jamestown Road (C19) All new developments of student housing in Camden are secured for this use by a planning obligation in the form of a S106 legal agreement.
The new policy approach to purpose built student accommodation and shared living is supported in supporting the delivery of housing.	Support welcomed.
Suggested wording change to H9 Part B.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.	The current wording is considered to be appropriate. No change is considered necessary.
Support principle of affordable housing delivery in appropriate locations. Further clarity should be set out in Part d of Policy H4 and supporting text regarding the fast-track approach when assessing the provision of self-contained affordable homes as part of alternative residential accommodation including PBSA. At present, whilst contributions may be sought from these developments in accordance with H9, it is unclear in what the threshold is for such proposals to meet the fast-track requirements. In addition, further evidence to support the justification for the proposed % contribution for such schemes should also be provided. Where the contribution towards self-contained affordable housing on-site is below the prescribed threshold, further clarity is required on whether off-site provision or a payment in-lieu will be required as a 'top-up' to meet the fast-track requirements.	The Local Plan does not seek to duplicate the detailed provisions in the London Plan for the viability threshold or fast-track approach, which are set out in Policy H5 of the London Plan 2021 for most forms of housing, and Policy H15 Part A.4 of the London Plan 2021 for student accommodation. They are summarised in Local Plan paragraphs 7.119 and 7.120 for most forms of housing, and paragraph 7.310 for student accommodation. The percentages have been determined through the London Plan 2021 and tested through the Examination in Public of the London Plan, and we have not sought to amend them. Nevertheless, our approach to affordable housing and the percentage that can be delivered is tested by the Camden Local Plan Viability Study 2025. As indicated in Local Plan paragraphs 7.119 and 7.310, the proportion of affordable housing and/ or must reach or exceed the threshold level to proceed on a fast-track basis (i.e. without submission of a financial viability assessment at the application stage). The London Plan does not provide for this to be 'topped up' through an off-site contribution or payment-in-lieu in order to proceed on a fast-track basis. However, as a matter of practice, the Council and the GLA have been prepared to consider on-site delivery of a combination of affordable housing and affordable student accommodation.

Main Issues	Councils Response
Remove reference to 'disproportionate' in sentence relating to loss of self contained housing as directly contradicts H3 and to ensure consistency.	We do not support the proposed change, which would prevent the Council from supporting proposals for student accommodation that would involve the loss of any self-contained housing whatsoever. Policy H9 Part B.1 indicates that whether the loss of self-contained homes is acceptable will be considered on the basis of the overall addition to housing supply involved in the development. Supporting paragraph 7.283 explains the purpose of the provision more fully, indicating that "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". We do not agree that this provision conflicts with Policy H3, which is primarily concerned (in parts B and C) with the loss of residential floorspace. Student accommodation constitutes permanent residential floorspace, so replacing self-contained housing floorspace with floorspace in student accommodation would not conflict with these provisions. We note that Policy H3 Part D does seek to prevent net loss of homes from alterations to existing houses and flats, but this provision aims primarily to protect the overall number of homes against the amalgamation of homes involving a net loss of more than one home (in effect the amalgamation of three or more homes). Should any change to the Local Plan be warranted, we consider that it should take the form of a minor change to the start of Policy H3 Part D rather than a change to Policy H9.
Add reference back to concentration of student uses impact. Suggested wording : <u>"will not create a harmful concentration of such a use in the local area and</u> will protects residential amenity in accordance with Policy A1.	We do not support the proposed change. This phrase was removed from the draft Local Plan in response to strong objections from providers of student accommodation, who noted that there is no evidence to suggest that well-managed student accommodation is harmful to amenity. Nevertheless, Policy H9 Part B.8 indicates that student housing should contribute to creating a mixed, inclusive and sustainable community, whilst supporting paragraphs 7.304 and 7.305 indicate we will still consider whether concentrations of such accommodation can prevent the creation of mixed, inclusive and sustainable communities, and whether any history of negative impacts on residential amenity suggests that additions to a particular concentration of student accommodation would be inappropriate.
Policy H9 and Policy H4D enable conventional self-contained affordable housing on student housing schemes. Policy H4D and paragraph 7.311 state that this alternative approach will be strongly encouraged, where feasible. It is noted that conventional affordable cannot be fully integrated into student accommodation. This is supported.	Support welcomed.
Introductory section noting the respondent, and that they had provided representation at Regulation 18 stage. Highlighting the importance of UoL, also noting the University Estate Strategy and that the physical estate includes a wide range of properties within the Bloomsbury Campus Area.	Comments noted
It is important that policies provide sufficient support and flexibility to allow universities to achieve their own aims and ongoing aspirations in relation to teaching, learning and research. Some amendments to draft policy wording is suggested within the comments below.	Comments noted
Draft policy H9 is considered relevant due to the shortage of student accommodation being experienced and significant demand within South Camden and the Bloomsbury Campus Area.	Comments noted

Main Issues	Councils Response
The draft policy target is based on the London Plan 2017 (and 2018 update), which is considered out of date, and likely to increase with the new London Plan. “The draft Camden Local Plan should therefore take account of the updated student need assessment when published and set out a higher target for Camden”.	The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year. 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. We will however 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.
Information from Higher Education Statistics Agency (HESA) is provided to demonstrate student demographics across Camden (and also Westminster, Islington and Tower Hamlets). It is suggested this highlights an undersupply within the borough, with a chart is provided to show the imbalance between where students live and study (Figure 1).	Comments noted.
Based on data from HESA, it is suggested there could be a 50% undersupply of student accommodation compared to the anticipated demand pool. This would place significant pressure on Camden’s housing market. Even noting the contributions from schemes in the pipeline, the unmet demand is suggested as approx. 69,900 full time students. Also, with concerns for future student number increases. The provision of new PBSA schemes within Camden will help to release self-contained housing currently in use as student accommodation.	Comments noted. The Council recognises that 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.
UoL request a specific policy to support delivery of additional student bedspaces within the borough and Bloomsbury Campus Area through: • An updated and higher target for student bedspaces within the Borough. • The provision of a specific target for the Bloomsbury Campus Area.	Draft Policy H9 - Purpose built student accommodation, aims to ensure there is a supply of student accommodation to support the growth of higher education institutions across the borough, including in Bloomsbury. Policy H9 sets a target of 200 additional student bedspaces a year. We will however 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. Policy S4 Bloomsbury Campus Area sets out the Council's overarching priorities for the Campus Area and supports the delivery of the Bloomsbury vision. The policy states that "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." Given this, we do not feel it is appropriate to include a target for student accommodation in Policy S4.
Acknowledging the draft policy allows for the target to be exceeded, there is concern that this would be resisted due to the priority for self-contained housing. It is also suggested that there is some hostility towards PBSA in certain locations, e.g.) Somers Town, possibly due to lack of academic presence in comparison to the Bloomsbury Campus Area (which is more appropriate).	Comments noted
The draft policy should acknowledge the concentration of listed buildings and other heritage assets in relation to delivering student accommodation. Significant weight should be afforded to the need for PBSA.	Policy S4 Bloomsbury Campus Area states that development in the area should seek to enhance the area’s rich historic and architectural character, and respect its many heritage assets. Further guidance on the Council's approach to the historic environment is then set

Main Issues	Councils Response
	out in Policy D5. No additional wording is considered necessary.
General support for policies in the draft Local Plan, however it is important that the Council's evidence base is up to date to ensure policies align with the University's strategic objectives. Moreover, draft policies ought to be flexible to facilitate alternative uses to align with changing needs and demands (e.g. post Covid).	Comments noted
Objection to approach regarding PBSA. • Unite suggest recommendations to parts B.1 and B.2, B.3, B.12 and C.4 • PBSA contributes towards housing supply. • The plan seeks to prioritise conventional housing development over PBSA. • London Plan Policy H15 and national policy recognise PBSA as a contributor to housing supply. • Unite do not therefore consider it sound to restrict concentrations of this housing type specifically.	The priority the Council gives to self-contained housing in the Local Plan reflects the intense competition for the limited supply of land in the borough, from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Due to the acute need in Camden for affordable housing (low cost rent and intermediate housing), and the limited opportunities to secure this from alternative forms of housing, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. Nevertheless, the Council also recognises that additional student accommodation contributes towards meeting our housing target, addresses a permanent housing need, and can reduce the pressure for students to share existing large homes. This is emphasised in Policy H9 which aims to ensure there is a supply of student accommodation to support the growth of higher education institutions across the borough. To this end, the Policy sets a target of 200 additional student bedspaces a year, which the Council will seek to deliver.
An example from Haringey Council is provided to demonstrate that PBSA should count towards meeting housing targets on a 2.5:1 ratio, in accordance with the London Plan.	
The respondent notes that since the Haringey example provided the ratio at which PBSA counts towards housing supply has now changed given the December 2024 updates to the Housing Delivery Test measurement rule book. The new ratio of 2.4:1 increases the impact PBSA has on housing delivery.	
The respondent notes that Camden acknowledge the provision of PBSA can help to limit pressure on the private rented market.	
Further examples are provided of appeal decisions consenting student development, in Cambridge and Cornwall.	
Fewer PBSA bedspaces increases the number of students occupying HMO accommodation, and increases demand for HMO conversion of housing stock. As noted in NPPG para 004.	
As PBSA contributes towards housing supply, any sites allocated for self-contained residential development should also allow PBSA.	
Noting paras61-63 of the NPPF, on the importance of the amount and variety regarding housing requirements, and para 125c “substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused”. Paragraph 125d goes on to “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs”. Site allocations for housing should include PBSA. Recommendation: Part B.1 and B.2 should be removed in their entirety.	
• Concerns regarding the requirement for PBSA schemes to comply with HMO standards. • HMOs and PBSA differ significantly, with PBSA having an emphasis on shared facilities and higher residential densities. • HMO standards are designed to accommodate a broad spectrum of tenants. • HMO standards focus on general living conditions without considering specific (academic) requirements for students. • Separate established guidance is in place (regionally) regarding PBSA, and there is no policy justification for Camden to deviate locally. • Non-self contained dwellings and PBSA should not be subject to the same minimum space standards. • Unite support the approach taken by the London Plan and LPG, in not providing example layouts. • Policy should recognise that PBSA is transitional and living standards can remain acceptable without standards being applied.	

Main Issues	Councils Response
Recommendation: The policy should be amended to remove any mention of HMO standards and relevant residential design standards and instead clearly state that PBSA schemes should adhere to the established guidance already in place at the regional level in respect of the approach to PBSA.	
• There are concerns regarding the requirement to provide affordable housing contributions as part of PBSA proposals due to impacts on viability. • Unite recommend that affordable housing contributions follow the requirements outlined in London Plan Policy H16 Part 10.	Where market-led development of purpose-built student accommodation are proposed, we will apply Policy H4 of the Local Plan as far as appropriate, having regard to Part D and all specific provisions for this type of housing in this Plan and in the London Plan. In essence, the London Plan provides for the affordable housing contribution from purpose-built student accommodation to take the form of affordable student accommodation. The Council will support proposals to offer contributions in accordance with the London Plan, 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 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.
• Applying affordable housing contributions to PBSA in the same manner as conventional residential uses is likely to cause viability challenges, failing to account the fundamental differences in these between these development types. E.g.) additional staff required. • PBSA is already subject to planning obligations and contributions affecting viability. • There is insufficient evidence to demonstrate that further contributions would be suitable for viable PBSA schemes.	
Increased costs to PBSA developments will mean: • PBSA providers will look to other LPAs. • Fewer viable schemes will reduce bedspaces delivered. • Increased demand will impact HMOs. • Increased demand will increase rent levels and reduce affordable accommodation. • Communal amenity space at risk to accommodate more bedspaces. • Affordable housing contributions impact viability and reduce contributions to open space. • Constraining PBSA is a constraint on overall housing. • Undersupply of PBSA puts additional pressure on family housing availability.	
• There is concerns regarding the need for PBSA schemes to enter into a nominations agreement regarding affordable student accommodation. • If there were an option to provide conventional housing instead, developers may choose to sacrifice affordable PBSA to avoid the need for a nominations agreement. • This would fail to meet policy, and reduce the number of units universities secure through nominations agreements.	
There is an emerging trend where PBSA is sacrificed in favour of conventional affordable housing, with example given relating to the LB Southwark Local Plan Policy P5, providing a route for 100% direct-let PBSA where all rooms are subject to a nominations agreement. However, also noting that the (Southwark) Council's priority is for self-contained housing with benefits which outweigh PBSA.	
• Unite provide examples of other boroughs, including Tower Hamlets, demonstrating a London-wide priority for conventional housing over PBSA. • Unite consider that draft Policy H9 is likely to reinforce this trend, resulting in a serious lack of affordable student accommodation being delivered.	
• There is no national planning policy requirement for provision of affordable housing arising from PBSA schemes. • The requirement is an entirely local policy. Recommendation: Policy H9 Part B.12 and Policy H4 Part D should both be amended to remove the option of on-site affordable housing contribution for PBSA development.	
There is concern regarding the requirement for PBSA to be redeveloped as housing (Part C.4), due to limits this has on variety of services and amenities in an area. The requirement for housing in place of PBBSA may not align with market demands. Flexibility in land uses can better accommodate changing needs. Recommendation: Part C.4 should be removed altogether.	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 consider it reasonable to seek to protect existing student accommodation.
The definition of the occupier of PBSA should be revisited and widened as part of future policy.	It is considered that the definition of the occupier of PBSA used in the Plan is appropriate.

Main Issues	Councils Response
The proposed revisions in the Regulation 19 version of Policy H9 provide improvements which recognise that student accommodation is a crucial contributor to wider housing delivery. However, the following amendments are proposed to enable (where appropriate) its delivery even further, and to ensure that the Local Plan is positively prepared, justified, effective and consistent with national policy: • Policy H9 Part B (1) - Regal seeks further clarity on this subsection, questioning if the disproportionate loss of self-contained homes is considered against the overall addition to housing supply (when considered against the ratio of 2.5 student bedrooms to 1 self-contained home). Further clarity is required for this policy criteria to be effective and consistent with the London Plan • Policy H9 Part B (2) - Regal welcome this criteria which provides flexibility to provide a range of student typologies. However, the policy could be improved to be better justified and aligned with market conditions through the proposed revisions below: “includes a range of accommodation to suit students with differing lifestyles and incomes, including cluster flats where possible, reflecting demonstrated demand”	Policy H9 Part B.1 indicates that whether the loss of self-contained homes is acceptable will be considered on the basis of the overall addition to housing supply involved in the development. Supporting paragraph 7.283 explains the purpose of the provision more fully, indicating that "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". Given that permanent self-contained housing is this Plan's priority land-use, the Council considers it appropriate to 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. No change to wording is considered necessary.
Student Accommodation • Support for Camden's focus on delivering a supply of purpose-built student accommodation ('PBSA') within the borough. • Upon review of the draft Local Plan, key comments on draft policies relating to student accommodation are provided in the representation.	Comments noted.
Draft Policy H9 (Purpose-Built Student Accommodation) • Student accommodation target figure is a significant underestimate of the amount of additional student housing bedrooms required. • The figure presented in draft Policy H9 does not come close to meeting the growing demand for PBSA beds in the area. • Suggestion that this is revised to promote a more accurate supply need.	The London Plan 2021 indicates that 3,500 bedspaces in purpose-built student accommodation will be required across London each year. 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. We will however 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
Draft Policy H9 (Purpose-Built Student Accommodation) • Regarding H9 Part 3, concern regarding requirement for PBSA to meet relevant standards for HMOs. • This approach is not consistent with the London Plan which states in Policy H15 that PBSA should provide adequate functional living space and layout for the occupants, and in which there is no reference to any specific design standards. • Suggests that reference to such guidance is removed from the draft policy. • Reference may be given in supporting text, however noting that the London Plan does not specify the guidance and therefore flexibility can be afforded.	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. 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 therefore considers it reasonable to require proposals for student housing to comply with the relevant minimum standards.

Policy H10 – Housing with shared facilities

Number of representations: approx. 3

Representations received from:

- Regal
- Joseph Homes

Main Issues	Councils Response
Suggested wording change to H10 Part B. 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.	The current wording is considered to be appropriate. No change is considered necessary.
Regal welcome the introduction of policy considering Large-scale Purpose-built Shared Living Accommodation. The following amendments are proposed to enable (where appropriate) its delivery even further, and to ensure that the Local Plan is positively prepared, justified, effective and consistent with national policy: Policy H10 Part B (1) - Regal seeks further clarity on this subsection, questioning if the disproportionate loss of self-contained homes is considered against the overall addition to housing supply (when considered against the ratio of 1.8 non-self contained communal accommodation to 1 self-contained home). Further clarity is required for this policy criteria to be effective and consistent with the London Plan.	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.

Policy H11 – Accommodation for travellers

Number of representations: approx. 12 (plus 527 objections to the allocation of the land adjacent to Constable House – Site Allocation C27)

Representations received from:

- GLA
- London Gypsies and Travellers
- Highgate Society

Main Issues	Councils Response
The target of between 11 new pitches by 2031/32 and 19 new pitches by 2041 is unrealistic due to limited availability of suitable sites. Camden should look at each potential pitch and carry out an exercise to investigate how many traditional housing units could be accommodated on this space and make a judgement from this.	Planning legislation requires local authorities to plan to meet the needs of Gypsies and Travellers through their Local Plans. The Local Plan target is based on a Londonwide evidence of need prepared by the GLA.
To be consistent with Policy H14 of the LP2021, LBC should clearly set out their ten-year pitch target and how they plan to meet those needs in full. The Plan should be updated to include the target and set out whether the two sites identified are able to meet this target or not. If LBC cannot meet their ten-year pitch requirement this would be a general conformity issue.	The Plan currently sets out the identified need for Gypsy and Traveller accommodation across the Plan period. We did not include a ten year pitch target in the Plan as we are relying on the findings of the Londonwide GTANA, which were delayed. Given that we now have a final need figure, we intend to propose a modification to update Policy H11 Accommodation for Travellers to include our ten year pitch target. London Plan Policy H14 A. states that boroughs should plan to meet the identified need for permanent pitches. Camden has planned to meet the identified need and has done all it reasonably can to find and allocate sufficient pitches - as set out in the Gypsy and Traveller Topic Paper we have prepared to support the Plan at examination. Therefore, although there is a small shortfall in the number of pitches identified, the Plan is considered to be in accordance with London Plan policy H14.
The Plan should include target numbers for pitches and a timeframe for delivery.	The Plan sets out the identified need for Traveller pitches at para 7.361. The Policy allocates two sites to help meet this need. We will propose a modification to update the Policy H11 to refer to the number of pitches we expect to be delivered across these site allocations. We have also prepared a Gypsy and Traveller Topic Paper to support the

Main Issues	Councils Response
	Plan at examination. This provides further detail on the timeframe for the delivery of these sites.
Support the allocation of the land adjacent to Constable House and the York Way Depot and adjacent land at Freight Lane to deliver Traveller pitches.	Support welcomed. Our initial design led capacity work for these sites shows that the land adjacent to Constable House could potentially accommodate 2 pitches and the land at Freight Lane could potentially accommodate 4 pitches.
Support Policy H11, Part B and C.	Support welcomed.
Main concerns continue to revolve around the necessity of early and effective engagement of Gypsies and Travellers in consultations about the policies that affect them, and the lack of reference to the London Plan Policy H14.	Comment noted. We have taken measures to engage with the Gypsy and Traveller community as part of the preparation of the new Local Plan. Furthermore, as the London Plan forms part of the Council's Development Plan, it is not necessary to also refer to London Plan Policy H14 in our Plan.
All references to Gypsies and Travellers should use capital initial letters, because these names refer to ethnic groups.	We will propose a modification to address this.
London Gypsies and Travellers suggests updating the wording of para 7.356 to read - Gypsies and Travellers means: (a) Persons of a nomadic habit of life, whatever their race or origin, including – (i) Persons who, on grounds only of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently, and (ii) Members of an organised group of travelling show people or circus people (whether or not travelling together as such); and (b) All other persons with a cultural tradition of nomadism or of living in a mobile home. The intention of the above definition is to ensure that ethnic Romani Gypsies and Irish Travellers are included, as well as those from any ethnic group who follow a nomadic habit of life. Members of these communities do not necessarily need to demonstrate a continued nomadic habit of life to be considered to be Gypsies or Travellers.	Para 7.356 of the Plan is clear that for planning purposes, the government's 'Planning policy for traveller sites' (2024) sets out definitions of travellers, gypsies and travellers, and travelling showpeople. Para 7.356 then provides a summary of the definitions set out on Annex 1 of the PPTS. To ensure the wording is aligned with that in the PPTS however we propose to take out the word 'other' from the first bullet point.
H11, Part A - Reinstate the wording on the target of 16 pitches by 2031 based on the accommodation needs identified in the 2014 Camden GTANA as this evidence continues to be the most up-to-date assessment of need.	We will propose a modification to refer to the pitch target. It should however be noted that the GLA's London-wide Gypsy and Traveller Accommodation Needs Assessment work has superseded the 2014 Camden GTANA and updated the overall need for pitches.
Suggest that to comply with London Plan Policy H14 D and E there should be explicit commitment under Policy H11 Part B to conduct an audit of existing sites managed by Camden Council, to identify issues such as overcrowding and disrepair, and plan to address these issues.	This is not considered to be a matter for the Local Plan. This function is undertaken by the Council's housing team.
Under Policy H11, Part D, add the following subclauses - 9. Include an appropriately detailed management plan; and 10. Demonstrate that quality standards have been co-designed in consultation with representatives of the local Gypsy and Traveller communities.	We will propose a modification to address this.
Ask for adjustments for disabled access to be made across all housing types including Gypsy and Traveller pitches, Under Policy H11, Part D, add the following subclause - 11. In the interest of accessibility and inclusivity, the Camden's Local Plan should apply a clear definition of accessibility to planning for affordable housing in general and social rented housing in particular, of which Gypsy and Traveller pitches are one type, to address mobility impairments as well as sensory impairments and neurodivergence, as recommended by the BSI standard Design for the Mind - Neurodiversity and the Built Environment (PAS 6463).	Policy SC2 Access for All seeks 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. As this would apply to applications for Gypsy and Traveller pitches, no change is considered necessary.

Chapter 8 - Responding to the Climate Emergency

Number of representations: approx. 29

Representations received from:

- Belsize Conservation Area Advisory Committee
- Riverside and Country Partnerships
- Land Sec
- UCL
- Climate Emergency Camden
- British Museum
- British Land
- Kentish Town Neighbourhood Forum
- London Property Alliance
- Highgate Society
- Highgate Conservation Area Advisory Committee

Main Issues	Councils Response
In our previous representations, we noted the importance of ensuring the policies are consistent with national policy and the London Plan, as well as the Government announcement ¹ made in December 2023 on setting local energy efficiency standards. We noted that ensuring consistency with these would help prevent delays to the delivery of allocated sites. As currently drafted, we remain concerned with the draft policies do not reflect the needs nor provide a flexible approach to site allocations. We set out our response to these below.	Comment noted.
Supports proposals in Chapter 8: Responding to Climate Change. Notes is not clear is whether this policy would achieve the NPPF and London Plan requirements as the numbers of applications is unknown.	Support welcomed. Comment noted.
Support CC10: Sustainable Design and Construction Certification.	Policy CC10 (Sustainable design and construction) was removed in the Regulation 19 draft and requirements for BREEAM moved to Policy CC6 (Energy use and the generation of renewable energy).
Chapter 8: Responding to the Climate Change Emergency. We consider that the policies contained within it are too prescriptive for a Local Plan and are most appropriately covered at the national level in Building Regulations and emerging national policy.	The policies in this chapter are considered to be appropriate for inclusion in a local plan and consistent with national policy and legislation. They seek to respond to Climate Change Act 2008, Planning and Compulsory Purchase Act 2004, National Planning Policy Framework, national guidance, the London Plan, the Council's Climate and Ecological emergency declaration and Camden's Climate Action Plan.
Chapter 8 Responding to climate change - Positives: - The goal of a net-zero carbon borough by 2030 is significantly more ambitious; - The policy doesn't just focus on operational carbon emissions from energy use. It takes a holistic view by integrating transport, water management, waste, nature. - By including embodied carbon (Policy C3) and climate adaptation (Policy C2), it addresses the climate crisis in a much more complete way; - Focus on Whole Life-Cycle Carbon: This is a crucial and progressive step; - It sets clear, measurable targets like high BREEAM ratings Excellent or Outstanding and the Urban Greening Factor score; - "The Be Lean, Be Clean, Be Green" hierarchy correctly prioritises reducing energy demand first, which is the most effective and sustainable approach; - The focus on avoiding overheating through passive design, managing flood risk with SuDS, and making buildings "connection-ready" for future heat networks is forward-thinking; - Camden is creating a market for green skills, technologies, and materials; - The mandate for post-occupancy monitoring is a game-changer. It tackles the notorious "performance gap" where buildings use far more energy in reality than their design models predict.	Support welcomed.

Main Issues	Councils Response
Chapter 8 Responding to climate change - Weaknesses: - Offsetting, the existence of a carbon offsetting mechanism can be seen as a loophole. The success of this element depends on the offset price being set high enough to be a genuine deterrent. Also, the real-world effectiveness of some offsetting schemes is debatable. A more radical policy might ban offsetting entirely. -	The offsetting approach recognises that an energy balance on site may not always be possible. It will only be used where applicants can demonstrate to the Council's satisfaction that they have done all that is feasibly possible to achieve an energy balance by minimising the building's predicted energy usage and maximising renewable energy generation.
Chapter 8 Responding to climate change - Weaknesses: This policy has limited power to compel private homeowners and existing businesses to undertake deep retrofits, which is essential for meeting the 2030 target.	The policies within the chapter support retrofitting measures across the borough. It is not possible for the Plan to compel homeowners and businesses to undertake retrofits.
Chapter 8 Responding to climate change - Weaknesses: Developers can, and do, argue that these requirements make projects, particularly those with a high proportion of affordable housing, financially unviable. The Council will face a constant balancing act between enforcing its climate policies and meeting its housing delivery targets.	Comment noted.
Chapter 8 Responding to climate change - Weaknesses: The most stringent requirements (e.g., net-zero, Whole Life-Cycle Carbon assessments) are typically applied to "major developments". While smaller developments have rules to follow, the cumulative impact of many smaller projects that don't meet the highest standards could still be significant.	The requirements in this chapter reflect the differing ability of schemes to incorporate climate change measures, taking into account their nature and scale. Policy requirements must be deliverable and viable.
Chapter 8 Responding to climate change - Weaknesses: Ensuring that the buildings are built to specification and operated efficiently post-occupancy is a huge challenge that goes beyond the planning approval stage.	Policy CC6 'New build construction' states "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)." Propose modification to Policy CC4 Minimising carbon emissions to include post construction Whole Life Carbon Assessment for major development as recommended by London Plan Guidance.
Chapter 8 Responding to climate change - Weaknesses: There may be a shortage of professionals with the expertise to conduct accurate Whole Life-Cycle Carbon assessments or design effective passive cooling systems. Similarly, the supply chain for low-carbon materials and advanced technologies (like ground-source heat pumps) may not be robust enough yet, leading to delays and higher costs.	Comment noted.
Chapter 8 Responding to climate change - Weaknesses: Planning officers will need the expertise to scrutinise complex energy models and Whole Life-Cycle Carbon assessments.	Comment noted.
Chapter 8 Responding to climate change - Weaknesses: While the policy encourages retrofitting during major refurbishments, it cannot, by itself, trigger the borough-wide deep retrofit program needed to hit the 2030 net-zero target for the entire borough.	Comment noted.
Success is constrained by: the focus on new builds, development viability, ensuring long term performance. Camden's Chapter 8 is a gold-standard planning policy that will succeed in driving down emissions from new builds.	Comment noted.
The BM continues to be generally supportive of the aims and ambitions of Chapter 08, to ensure development is designed to mitigate and adapt to climate change to respond to the climate emergency. While the BM supports the aims of these individual draft policies, it remains keen that they are applied appropriately to future applications (including the Western Range) where there is an existing site-wide strategy in place to address these requirements.	Comment noted.
The environmental catastrophe that we are facing is the result of unconstrained growth, causing carbon emissions, resource exploitation and lack of protection of our ecosystems. The ways in which these issues are addressed in Camden's proposed new Local Plan do not significantly alter business-as-usual development models.	The policies in this chapter seek to respond to, and are considered to be consistent with, the Council's Climate and Ecological emergency declaration, Camden's Climate Action Plan, national policy and legislation (the Climate Change Act 2008, Planning and Compulsory Purchase Act 2004, National Planning Policy Framework and Guidance), and the London Plan.
Single family dwellings are also demolished to enable wealthy residents to build larger ones. This should not be permitted where the existing home is adequate.	Local Plan Policy CC2 prioritising the retention of existing buildings.

Main Issues	Councils Response
We see demolition and rebuild of office space continuing on a business-as-usual basis. There is no effective constraint on the demolition of existing buildings to enable their owners to redevelop for profit.	Current Local Plan policy CC1 (Climate change mitigation) and draft Local Plan policy CC2 prioritising the retention of existing buildings.
We should be prioritising the reduction of up-front emissions caused by the construction of a building (Modules A1-5). There needs to be fixed targets for the carbon intensity of new construction (Modules 1-5), to make a change to 'business as usual' construction. This should aim to change the nature of construction and vastly increase the likelihood that existing buildings will be retained, converted and re-used, in a way that minimises carbon emissions.	Policy CC4 (Minimising carbon emissions) seeks to ensure upfront embodied carbon emissions are reduced.
The construction of new basements is particularly high carbon, due to the quantity of concrete and steel required. New basements should not be permitted unless justified by a specific required use.	It is noted that the embodied carbon to construct a below ground extension is higher than for an above ground extension. Policy D6 (Basements) requires applicants to have sought to reduce the embodied carbon of the basement and expects data showing the upfront embodied carbon of the basement proposal.
The existing and proposed Local Plan policies fail to ensure buildings that are fit for purpose are retained. The proposed plan itself includes within its Site Allocation Plan the proposed demolition of buildings which are performing well, meeting needs of residents and occupants and should not be demolished.	Paragraph 1.39 states that applicants proposing substantial demolition on Site Allocations will need to comply with the requirements in Policy CC2. The policy approach is to prioritise retention unless evidence demonstrates to the Council's satisfaction that the applicant has explored development options informed by a condition and feasibility assessment, and the proposal constitutes the best use of the site.
What occurs at present is that Circular Economy policy is used to justify the demolition of existing buildings without considering the carbon emissions that will result.	Policy CC2 (Prioritising the retention of existing buildings) recognises that there may be instances where a proposal for demolition will be acceptable. Policy CC3 (Circular economy) and CC4 (Minimising carbon emissions) seek to ensure any replacement building or large extensions are designed to minimise waste and carbon, use resources efficiently, are adaptable for future use.
Carbon offset payments do not actually offset the carbon targets that are missed. Developers pay £95/ tonne CO2e, but it costs up to £400 / tonne to make energy reductions to offset the equivalent emissions.	It is noted that the current price of carbon is set lower than recent evidence. The offset to meet an energy balance in Draft Local Plan Policy CC6 is based upon the cost of providing the equivalent solar PV elsewhere in the borough.
We would suggest the council seeks to condition post-completion verification that the retrofit work has been carried out. A balance will need to be struck depending on the scale of development.	The Council will review the need for post-completion monitoring of retrofit.
8.6. Recommend this is worded to refer explicitly to conservation / Listed properties as it is unrealistic / far too constricting for other properties.	This comment does not appear relevant to paragraph 8.6.
Support the overarching aspirations relating to climate change in the draft Local Plan, but the draft policies are incredibly detailed and would be more appropriate as part of a new/updated Supplementary Planning Document.	The level of detail in the policies is considered appropriate and necessary to ensure policy aims are achieved across application types. Supplementary Planning Guidance is useful in providing additional detail but it cannot include policy criteria.
Sustainability • Support for approach Camden are taking in further emphasising the importance of sustainability as a key factor in the consideration of future development. • Support for highlighting the climate emergency and ways in which the borough is looking to tackle this issue. • UCL Sustainability Plan is in broad alignment and wish to provide some further suggestions.	Support welcomed, further suggestions noted.
Whilst we fully recognise the climate emergency and support the council's overarching aspirations relating to climate change, we consider that the policies contained within the draft Plan are too detailed and already covered at the national level in the latest Building Regulations and potentially through the emerging National Development Management Policies.	The level of detail in the policies is considered to be reasonable and appropriate. The approach is considered to be consistent with national and regional policy. The content of National Development Policies is not yet known.

Policy CC1 – Responding to the climate emergency

Number of representations: approx. 31

Representations received from:

- Redington Frognal Neighbourhood Forum
- Primrose Hill Conservation Area Advisory Committee
- Riverside and Country Partnerships
- Hilson Moran
- UCL
- General projects Ltd
- The Arch Co
- Climate Emergency Camden
- Shaftesbury Capital PLC
- British Museum
- Regal
- British Land
- Highgate Society
- Environment Agency

Main Issues	Councils Response
Support inclusion of a threshold to clarify when Sustainability Statements are required. Wording does not provide any flexibility for situations where historic buildings/existing building stock is being refurbished/ renewed. Amend supporting text to further acknowledge circumstance when energy efficiency improvements to buildings cannot always be made due to heritage considerations: <u>The Council recognises that sustainability in heritage buildings seeking to deliver modern energy efficiency and environmental impact reduction will need to be balanced with heritage conservation.</u>	Support welcomed. Policy CC1 sets out the overarching strategic policy approach in the climate chapter. Further policy in relation to existing buildings and heritage is provided within the corresponding climate change policies and Policy D5 Historic environment. No change to CC1 is therefore considered necessary.
The Local Plan's ambition to make Camden a green, clean, vibrant, accessible and sustainable place is closely aligned with The Arch Co's sustainable nature. The supporting policy text should acknowledge the unique characteristics of railway arches- it may not be possible or only feasible to provide GI in a limited way.	We do not consider a specific mention of railway arches is necessary. The policy contains sufficient flexibility to consider the specific circumstances of different types of premises.
Suggest all references made to the climate emergency are amended to read 'climate and ecological emergency'.	Reference is made to the climate and ecological emergency throughout the Local Plan. The title of chapter 8 does not include 'ecological' as the policies within this section are predominately climate related and could be confused with the policies contained within the Natural environment chapter.
Suggest the wording of Policy CC1 A 7 is amended to include "Expanding".	It is not considered that this additional wording is necessary.
Suggest the wording of paragraph 8.8 changes reference of green roofs to living roofs, and add bullet point "Adopted Building with Nature Standards".	The term 'green roofs' is well-established and we consider it reasonable to retain the terminology. It is not considered necessary to add 'Building with Nature Standards'.
Policy CC1 is strongly welcomed (A 1-9, B).	Support welcomed.
We recommend clarifying that a “pragmatic” approach will be taken in the policy or supporting text, specifically for site allocations. As currently worded, the draft Local Plan is not positively prepared because it is unclear how development on any site allocation could be optimised and viably delivered without demolition and rebuilding. Many of the site allocations comprise land with existing buildings and paragraph 7.28 of the draft Local Plan describes that in order to maximise the delivery of homes to meet Camden's needs, each site that comes forward must be optimised in its potential for housing.	The Plan prioritises retention of buildings. Any proposals for demolition will be assessed against policy CC2 which includes consideration of whether a proposal constitutes the best use of the site and optimises site capacity.
The BM would welcome further development of the policy wording and supporting text to explicitly acknowledge the tension between the requirements and constraints of listed buildings in the context of responding to the climate emergency, and some flexibility in the application of the policy to such sites to reflect this.	Policy CC1 sets out the overarching strategic policy approach in the climate chapter. Further detail on heritage and sustainability is provided within policies CC5 (Sustainability improvements to existing buildings) and D5 (Historic Environment).

Main Issues	Councils Response
Climate Emergency Camden's comments on the framing of the Climate and Ecological Emergency in the draft new Local Plan are in red. The original proposed Local Plan text is in black. Chapter 08 - Responding to the Climate Emergency It should say 'Climate and Ecological Emergency' as the impact of unconstrained growth on global ecosystems is as much a threat as climate change.	The chapter title does not include 'ecological' as ecology is covered in Section 11 on the Natural Environment. Reference to the climate and ecological emergency is, however, included in the supporting text.
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. What does this mean for LBC's planning policy? There is no acknowledgement of the implications of the Act.	It is not considered necessary for the Local Plan to include further detail on the Climate Change Act 2008.
Camden net zero by 2030. - This is not possible, and this should be acknowledged.	The Local Plan sets out the Camden Climate Action Plan ambition of reaching zero carbon by 2030. This ambition has not changed and therefore remains within the Local Plan.
8.3 The Council's Climate Action Plan sets out a number of actions to help achieve this. This is not true. There are very few actions that result in a measurable decrease in carbon emissions.	Comment noted.
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. By the time the Local Plan is approved there will be a new Climate Action Plan. This has not yet been confirmed.	Comment noted.
Policy CC1 A1 refers to prioritising and enabling the repurposing and re-use of existing buildings over demolition. This is not borne out by the detailed site-based policies. It is immoral and hypocritical to propose/ imply the demolition of Juniper Crescent, Hawley Wharf and 250 Euston Road, due to the environmental impact that will result.	Policy CC2 seeks to prioritise retention unless evidence demonstrates to the Council's satisfaction that the applicant has explored development options informed by a condition and feasibility assessment, and the proposal constitutes the best use of the site. Where site allocations 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 (Prioritising the retention of existing buildings). Further information on the work the Council has undertaken to inform the approach taken to the site allocations and the indicative site capacities identified in the Plan is set out in the Site Selection Topic Paper.
A2 is an existing policy, but one which has not been effectively enforced, as borne out by previous planning application decisions taken by Camden Council. A different approach to planning will be required to achieve any significant benefit from this policy.	Other plan policies set out further detail on the approach to these matters. Policy CC3 (Circular economy) and CC4 (Minimising carbon emissions) seek to ensure any replacement building or large extensions are designed to minimise waste and carbon, use resources efficiently, are adaptable for future use. Policy CC2 (Prioritising the retention of existing buildings) recognises that there may be instances where a proposal for demolition will be acceptable.
Carbon offset payments should not be permitted, as they do not actually offset the carbon targets that are not met. Developers pay £95/ tonne CO2e, but it costs Camden up to £900 / tonne to make energy reductions to offset the equivalent emissions. Developers should develop schemes that meet the requirements, even if that results in a development that does not fully exploit the land-value.	It is noted that the current price of carbon is set lower than recent evidence. The offset to meet an energy balance in CC6 is based upon the cost of providing the equivalent solar PV elsewhere in the borough.
Policy CC1 A6 This should take into account the likelihood that the Thames will flood significantly in future, and that the Thames barrier will be significantly challenged by 2050.	Flood risk is addressed in further detail in Policy CC10 (Flood risk). This policy has been informed by an update to the Council's Strategic Flood Risk Assessment.
Policy CC1 A8 8. mitigating and improving poor air quality in the borough; This is an environmental pollution issue and should not be in a policy about mitigating and adapting to climate change, as it is not relevant to that objective.	Reference to air quality is made in Policy CC1 as the reduction in emissions contributes towards the mitigation of climate change. Policy A3 Air Quality in Chapter 13 Protecting Amenity set out the Plan's detailed approach on this matter.
9. prioritising sustainable transport. There should be an explicit statement regarding how this is expected to reduce carbon emissions.	Further detail on the promotion of sustainable transport and the impact on carbon emissions is provided within Policy T2 (Prioritising Walking, Wheeling, and Cycling).
Fighting climate change is beyond the remit the remit of 'Sustainable Development'. There needs to be statement within this explaining how the minimisation of the reduction of carbon emissions in the short term has been prioritised.	Responding to the climate and ecological emergency has been a key focus of the Local Plan which includes the reduction of carbon emissions. Policy CC4 specifically covers minimising carbon emissions.

Main Issues	Councils Response
Policy D1 (Achieving Design Excellence): this policy focusses too much on aesthetic issues and not enough on environmental design	Policy D1 (Achieving Design Excellence) 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 D6 (Basements): basements should be prohibited on the grounds that they use an excessive amount of cement and steel, the manufacture of which causes around 15% of global emissions.	It is noted that the embodied carbon to construct a below ground extension is higher than for an above ground extension. Policy D6 (Basements) requires applicants to have sought to reduce the embodied carbon of the basement and expects data showing the upfront embodied carbon of the basement proposal.
It is still unclear whether 'net zero carbon' in operation refers to the London Plan definition (regulated energy only, achieving 100% savings relative to Part L Target Emission Rate) or voluntary industry definitions such as the UK NZCBS	The definition of net zero carbon is provided in Policy CC6 "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."
500m2 can be a good threshold for sustainability statement, but in some schemes the works are so limited that there are not many things to include. Other borough have started using the 500m2 as threshold for various sustainability requirements, but it might be that a good starting point for major developments to be 1,000m2.	Sustainability Statements are not requested for works to a building of 500 sqm square floorspace or more unless the proposal includes the addition or replacement of 500 sqm floorspace or provides one or more homes.
Policy CC1: Responding to climate change We welcome the additional policy clauses around retrofitting to support better energy efficiency of existing buildings.	Support noted.
Support CC1 and CC2.	Support welcomed.
Support for the aspiration to prioritise the provision of measures regarding climate change. However, Point 4 of Policy CC1 which requires that new buildings are designed and constructed to be net zero carbon in operation is therefore not realistic. Regal would propose a degree of flexibility into the policy wording to allow for instances where it is not feasible to achieve net zero in operation. A proposed policy wording is set out below in order to ensure that the Local Plan is positively prepared: Policy CC1 Part 4 - Encouraging new buildings to be designed and constructed to be net zero carbon in operation, where feasible.	Policy CC1 sets out the overarching strategic policy approach in the climate chapter. Further detail is provided within the corresponding policies. CC1 outlines a policy aim which is to ensure new buildings are designed and constructed to be net zero carbon in operation, and policy CC6 defines in more detail how this aim is applied and where there may be instances where this cannot be achieved.
It would be beneficial to understand to which definition 'Net Zero' aligns, and whether this is an alignment with the forthcoming Net Zero Carbon Buildings Standard?	The definition of net zero carbon is provided in Policy CC6 "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."
8.6. Recommend this is worded to refer explicitly to conservation / Listed properties as it is unrealistic / far too constricting for other properties.	This comment does not appear relevant to paragraph 8.6.
Policy CC1: Responding to climate change We welcome the additional policy clauses around retrofitting to support better energy efficiency of existing buildings.	Support noted.

Policy CC2 – Prioritising the retention of existing buildings

Number of representations: approx. 29

Representations received from:

- London Property Alliance
- Unite Group PLC
- British Land
- Places for London
- British Museum
- St George West London Ltd
- Shaftesbury Capital PLC
- Kings Cross Central Limited Partnership
- Hilson Moran
- Camden YIMBY

- Primrose Hill Conservation Area Advisory Committee
- Riverside and Country Partnerships
- Redington Frogna! Neighbourhood Forum

Main Issues	Councils Response
Support and endorse the policy initiatives to improve existing building stock. The requirement for a pre-demolition audit for development proposals that involve less than substantial demolition (i.e. where less than 50% of the building's floorspace would be removed) is overly onerous and costly for applicants where only a small level of demolition is proposed. This should only be required for planning applications involving substantial demolition - over 50% Paragraph 8.26 as currently worded captures any demolition proposals. Amend to exclude minor internal demolition works.	Minor works, such as internal removal of partitions, that do not require planning permission would not fall under Policy CC2. Pre-demolition audits are sought where demolition is taking place of a scale that does not trigger the requirement for a condition and feasibility assessment and development options appraisal. The level of detail submitted will be commensurate to the scale and nature of the proposal, and it therefore not considered overly onerous.
Suggest the wording of Policy CC2 is amended to include 4. The space released will be used to provide new green space and wildlife habitat.	The provision of green space and wildlife habitat are considered in other policies and is not considered necessary or appropriate to add reference in Policy CC2.
Policy CC2 is strongly welcomed.	Support welcomed.
Remain concerned how Policy CC2 is applied to the site allocations. Moving through such a process on allocated sites could lead to the significant delay of schemes. It also creates significant uncertainty for developers if they are looking to acquire a site when there is substantial doubt created through these policies whether or not a site allocation site can be redeveloped. This work should have been considered at plan making stage for each site allocation. The Draft Plan needs to make clear how this policy has been applied to the assessment of site allocations by clarifying that the tests should not be applied to site allocations.	The Plan prioritises retention of buildings. Any proposals for demolition will be assessed against policy CC2 which includes consideration of whether a proposal constitutes the best use of the site and optimises site capacity. The policy requests a review of feasible development options. If a development option is not feasible, the applicant can demonstrate why this has not been explored.
Financial viability should be specifically referenced within the wording of the policy and supporting text. In many instances, the commercial return associated with some of the potential development options, particularly in relation to retrofit and substantial refurbishment is likely to be simply too low to encourage developers to pursue these approaches.	The policy states that before progressing detailed proposals for submission developers considering substantial demolition will be expected to undertake a 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. It is considered that the policy is worded to give sufficient flexibility at the planning application stage to allow for the consideration of viability, when assessing whether a development option is feasible or not. Given this no change to wording is considered necessary.
Reviewing and testing all alternative options and permutations is likely to be prohibitively complex and expensive. It is overly complex and will produce uncertainty in the planning and development process. In the Knowledge Quarter, where growth is strongly supported, it is not likely to prove effective nor is it in general conformity with national and regional policy. The policy needs to be reworded, to address the concerns raised above or removed in its entirety.	The policy requests a review of feasible development options. Camden Planning Guidance 'Energy efficiency and adaptation' provides a list of what these may entail (refit, refurbish, substantial refurbishment and extension, reclaim and recycle) if however a development option is not feasible it is for the applicant to state why this has not been explored.
Remains of the view that this approach must be applied on a case-by-case basis with consideration for each specific site's constraints and needs.	Comment noted.
- B.1 - What are the specific topics or methodology to be included for the condition and feasibility assessment?	Further information on the condition and feasibility statement is provided in paragraphs 8.13 - 8.15. A cross reference to Camden Planning Guidance is missing, and we will propose a modification to address this.
- E15B.2 - What are the specific topics or methodology to be included for the development options appraisal?	Further detail on the development options appraisal is provided within paragraphs 8.16 - 8.22.
D - What sufficient evidence is required to attain the Council's satisfaction when less than substantial demolition is proposed by the developer?	Where less than substantial demolition is proposed the applicant is expected to submit detail on how their proposal has been informed by the waste hierarchy and is aligned with circular economy principles in Policy CC3. Given that the proportion of demolition will vary on a case by case basis it would be unreasonable to specify the degree of information to be submitted.

Main Issues	Councils Response
- 8.13 - Is a conditional and feasibility assessment not required for schemes considering less than substantial demolition or 'retain and build'?	Condition and feasibility assessment will not be required for proposals considering less than substantial demolition.
- 8.13 - Does floorspace mean Gross Internal Area, Net Internal Area, or other?	The reference to floorspace here means Gross External Area. We will propose a modification in para 8.13 to clarify this.
- 8.15 - Whose responsibility is it to hire the independent reviewer?	It would be the Council's responsibility to commission an independent review to be paid for by the developer.
- 8.15 - Does the council have a checklist/guideline for consistency in the review process?	If the condition and feasibility study concludes that retention of the existing building is not feasible this may require independent verification by a structural engineer. Other cases may not need independent verification but will need to be assessed on a case by case basis.
- 8.21 - Is a WLCA not required for schemes considering less than substantial demolition or 'retain and build'? - 8.27 - Is a WLCA and CES not required for schemes considering less than substantial demolition or 'retain and build'?	A Whole Lifecycle Carbon Assessment will only be required where the principle of substantial demolition is acceptable or is a major development. Policy CC4 B states a WLC assessment is required for new build major development where it should refer to development including the addition or re-provision of 1,000 square metres floorspace. We will propose a modification to address this.
- 8.22 - We strongly encourage the Council to consider the inclusion of the third party review for the condition and feasibility assessment, and options appraisal?	Paragraph 8.22 states "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. It may not be necessary for all applications to have independent assessment.
- 8.30 - It would be beneficial for the industry to include a list of stakeholders for each waste stream within North London, as an appendix perhaps?	This level of detail is not considered appropriate for the Local Plan.
NPPF Paragraph(s) Breached 11, 125, 152. Re-balance test: permit redevelopment where it demonstrably optimises housing capacity while achieving whole-life-carbon gains.	NPPF paragraph 161 states that "The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It 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." The construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The Local Plan prioritises the retention of existing building unless it can be demonstrated "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. (Policy CC2 C).
Whilst we support the overall objectives set out in Policy CC2, we consider that greater flexibility is required where public transport infrastructure schemes noting the complexity and wider associated public benefit, for example, the Camden Town Over Station Development site allocation. The approach should be proportionate. Consider that the text in paragraph 8.25 is a fundamentally important element ensuring the appropriate application of the policy and should therefore be included in the policy itself. Paragraph 8.24 should specifically mention public transport infrastructure.	It is considered that the text in paragraph 8.25 appropriately provides further detail on the application of Policy CC2 and it is not necessary to include this wording within the policy. Paragraph 8.24 could be amended to include 'public transport infrastructure'.
Unite support policy CC2 in principle. Recommendation: It is considered that refurbishment should only be supported where it achieves low embodied carbon, efficient use, and Net Zero Carbon principles – avoiding refurbishment for its own sake.	Support welcomed. The Local Plan supports retaining, re-purposing, refurbishing and extending existing buildings as the starting point when considering development options for a site as it will usually be the most sustainable option.

Main Issues	Councils Response
The Policy CC2 approach to prioritising retention of existing buildings should be subject to financial viability.	The policy states that before progressing detailed proposals for submission developers considering substantial demolition will be expected to undertake a 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. It is considered that the policy is worded to give sufficient flexibility at the planning application stage to allow for the consideration of viability, when assessing whether a development option is feasible or not. Given this no change to wording is considered necessary.
Policy CC2 is more onerous than existing requirements. The new policy requires applicants to undertake a condition and feasibility assessment to understand the re-use potential of the existing buildings and explore the best use of the site, which includes a requirement for the applicant to explore a range of alternative uses.	The Local Plan approach is considered to be reasonable and appropriate. The current Local Plan 2017 already requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building and expects all developments to optimise resource efficiency (Policy CC1). Condition and feasibility studies and the review of feasible development options have been included in the Council's supplementary planning document Camden Planning Guidance 'Energy efficiency and adaption' since 2021. The Local Plan review provided an opportunity to include the clear consistent framework outlined in the SPD within Local Plan policy.
Policy CC2 (Part C1) acknowledges that there may be significant structural issues with an existing building that would prevent it from being retained. The policy should make clear that, in these circumstances, proposals for substantial demolition would be acceptable without needing to carry out the development options appraisal.	We will propose modification to address this.
Policy CC2 (Part C2), which relates to the selection of the development options, should only apply where the condition and feasibility assessments conclude that there are no significant structural issues present. The policy also does not recognise that, in some instances, one or more of the development options (retention and retrofit; substantial refurbishment and extension; reclaim and recycle) may not be practically deliverable for a variety of reasons, including financial viability.	The policy requests a review of feasible development options. Camden Planning Guidance 'Energy efficiency and adaptation' provides a list of what these may entail (refit, refurbish, substantial refurbishment and extension, reclaim and recycle). If a development option is not feasible the applicant can explain why this has not been explored.
Financial viability should be specifically referenced within the wording of the policy and supporting text. In some instances, the commercial return associated with some of the options, particularly retrofit and substantial refurbishment, may be too low to enable developers to finance and pursue these approaches.	It is considered that viability may be a consideration in whether a development option is feasible or not. However, its inclusion amongst many other factors is not considered necessary to include.
Reviewing and testing all alternative options and permutations is likely to be prohibitively complex and expensive. The design work required would be very extensive and the time, costs and complexity of this may prevent some proposals from being considered and discourage potential investment, contrary to strategic objectives.	The policy requests a review of feasible development options. Camden Planning Guidance 'Energy efficiency and adaptation' provides a list of what these may entail (refit, refurbish, substantial refurbishment and extension, reclaim and recycle). If a development option is not feasible the applicant can explain why this has not been explored.
Policy CC2 as currently drafted is not positively prepared. It is overly complex and will produce uncertain development management outcomes. It is not likely to prove effective, in the context of plan-making for a location where growth is strongly supported, nor is it in general conformity with strategic policy. The policy needs to be reworded to address the concerns raised above or removed in its entirety for the reasons set out above.	The policy is considered to be reasonable and appropriate and consistent with strategic policy. Given the climate and ecological emergency, it is important to explore whether innovative solutions to reusing existing buildings are possible.

Main Issues	Councils Response
It is unclear how development on any site allocation could be optimised and viably delivered without demolition and rebuilding. If the priority to the repurposing and re-use of existing buildings is applied so strongly to existing buildings on site allocations, there will be issues with the Draft Plan meeting its development targets. The Draft Plan needs to make clear how this policy has been applied to the assessment of site allocations. Policy should be amended to read - Policy CC2 Part B: “Developers considering the substantial demolition of existing buildings outside of the site allocations will be expected to undertake the following assessments, before progressing detailed proposals for submission:” Policy should be amended to read - Policy CC2 Part C: “Outside of the Site Allocations ✚ the Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council's satisfaction that:”	The new Local Plan includes a number of site allocation policies. Where a housing capacity is identified for a site 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 (which takes into account the principles set out in Policy CC2). 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. 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. Further information on the approach the Council has taken to setting site capacities is set out in the Site Selection Topic Paper.
	Site allocations are not excluded from Policy CC2. The policy approach is to prioritise retention unless evidence demonstrates to the Council's satisfaction that the applicant has explored a range of development options informed by a condition and feasibility assessment, and the proposal constitutes the best use of the site (which includes optimising site capacity) when considered against alternative options, which include retention.

Policy CC3 – Circular economy and reduction of waste

Number of representations: approx. 13

Representations received from:

- GLA
- Hilson Moran
- British Museum
- British Land
- Unite Group PLC
- Environment Agency

Main Issues	Councils Response
The policy and supporting text should acknowledge that designing for adaptability and deconstruction can add materials and up-front embodied carbon.	The policy has been drafted to ensure that development takes account of using materials with lower embodied carbon.
Whilst we welcome the recognition of the benefits of temporary storage banks and the sharing of information via a database, this should be undertaken at a London-wide level through existing platforms, rather than through local planning policy.	Comment noted.
The BM remains supportive of the principles of Policy CC3 but welcomes the acknowledgement that it may need to be applied more flexibly to specific developments which are balancing different considerations, including heritage.	Comment noted.
- C - Is a CES not required for schemes considering less than substantial demolition or 'retain and build'?	The scale of development of schemes proposing less than substantial demolition will vary. However, it is considered that the requirement for a Circular Economy Statement should include proposals which add or replace 1,000 square metres floorspace (major development). We will propose a modification to clarify this.

Main Issues	Councils Response
- D - It would be beneficial for the industry to include a list of local sites available for temporary storage, as an appendix perhaps? - D - It would be beneficial to include an order of actions required to facilitate temporary storage of existing materials?	This level of detail is not considered appropriate for the Local Plan.
- 8.34 - Who are the stakeholders to be contacted to enable the use of excavated material as suggested in the North London Waste Plan 2022?	Paragraph 8.34 provides examples how excavated material could be used. It is not appropriate for the Local Plan to include a list of stakeholders to be contacted.
- 8.36 - What are the specific scenarios the Council expects a Construction Management Plan? - 8.36 - What are the specific topics or methodology to be included for the Construction Management Plan?	Policy A1 (Protecting amenity) includes a requirement for Construction Management Plans (CMP) for all major development. "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. Paragraphs 13.16 - 13.19 provides further detail. Paragraph 8.36 should include a cross reference to Policy A1 (Protecting amenity) and we will propose a modification to address this.
- 8.43 - We request the Council to include a website link to the mentioned database to enable sharing of information? Additionally, specific topics/information to be included in the database should be provided?	The Plan refers to an aspiration for a database of materials. Any updates on this matter will be provided on the Council's website or Camden Planning Guidance.
Policy CC3: Circular economy and reduction of waste. We are pleased to see the inclusion of clause b(4) around on-site sorting and re-use of materials. We also welcome the inclusion of Figure 19 that outlines the waste hierarchy established in the North London Waste Plan.	Support noted.
We believe that all development (not just major development) should demonstrate the facilitation of the movement of waste up the hierarchy.	Policy CC3 (Circular economy) seeks to ensure all development minimises waste through the application of the waste hierarchy; this is not limited to major development.
Unite support policy CC3 in principle. However proposals should avoid having to be driven down over engineering for flexible design. Recommendation: Circular Economy requirements should be proportionate to the planning stage and do not compromise sustainable, efficient PBSA design by over prioritising flexibility or detail at an early stage.	Support welcomed. Agree that the level of detail should be proportionate to the scale and nature of a proposal. The policy has sought to achieve a proportionate approach by requiring a Circular Economy statement for major developments and for all other development 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 focus is not solely on flexible design but is one of the principles considered in a Circular Economy statement.
If the waste site at Regis Road is identified as surplus capacity, it should in the first instance be offered to other LPAs within London who are unable to meet their apportionment requirements. The LSIS, waste sites and aggregate sites should be clearly identified on the Policies Map.	Comment noted. These sites are designated on our draft Policies Map.

Policy CC4 – Minimising carbon emissions

Number of representations: approx. 10

Representations received from:

- London Property Alliance
- Unite Group PLC
- British Land
- Hilson Moran
- Primrose Hill Conservation Area Advisory Committee
- Redington Frognal Neighbourhood Forum

Main Issues	Councils Response
Suggest Policy CC4 includes a commitment to train planning officers on embodied and emitted carbon.	This is not a matter for the Local Plan.
Policy CC4 is welcomed.	Support welcomed.

Main Issues	Councils Response
It should be noted that the targets in Policy CC4 may not always be achievable depending on the typology of the development and should therefore be applied flexibly, with supporting evidence where benchmarks cannot be met.	Paragraph 8.52 states that the standard GLA benchmarks are an 'expectation'. Given these do not set a high bar is not unreasonable to request these as a minimum, however justification for not meeting the expected benchmark will be taken into consideration when planning applications are assessed.
- 8.49 - We strongly encourage the Council to consider the inclusion of the third party review for the WLCA?	We will propose a modification to address this matter.
- 8.49 - What are the penalties of not meeting the targets/performances produced during in the planning submission?	Policy CC4 expects, as a minimum, for standard WLC benchmarks to be met. Where this standard benchmark cannot be met a full justification will be required, and the merits of the scheme will need to be considered as to whether to recommend the scheme for approval or refusal.
- 8.52 - What benchmarks would be used for certain building types including hotels, student accommodations, etc.? (as not relevant to given benchmarks i.e. residential)	As per London Plan Guidance (Whole Life-Cycle Carbon Assessments) paragraph 3.2.5 the benchmarks should be set against the most relevant benchmark. "The estimated total WLC emissions from the baseline for the development. All developments, regardless of their scope, are expected to compare their WLC baseline against the most relevant benchmark. If the WLC emissions of a development fall outside the range of the benchmarks (whether they are higher or lower), applicants should explain why in the relevant text box of the template.
- 8.52 - What sufficient evidence is required to attain the Council's satisfaction when aspirational WLC benchmarks cannot be met?	As there are so many variables to consider, depending on the site and proposal, this would need to be considered on a case by case basis.
Unite recommend developing typology-adjusted WLCA benchmarks, with reference to NZCBS and RICS guidance, to reflect the specific material, system intensities and service profiles of PBSA. Recommendation: The policy could be amended to establish more ambitious targets.	At this point in time we have sought to align our policy approach with the London Plan, whilst also going further and requiring a Whole Lifecycle Carbon Assessment for all major development and development proposing substantial demolition. Monitoring of this policy will assist future policy development.
We support the principle of setting evidence-based targets for developers and welcome the recognition in, Paragraphs 8.51 and 8.52 that these benchmarks set a range, however it should be noted that these targets may not always be achievable depending on the typology of the development and should therefore be applied flexibly, with supporting evidence where benchmarks cannot be met.	Paragraph 8.52 allows for justification to be made where the benchmarks cannot feasibly be met.

Policy CC5 – Sustainability improvements to existing buildings

Number of representations: approx. 18

Representations received from:

- Belsize Conservation Area Advisory Committee
- Redington Frognal Neighbourhood Forum
- Primrose Hill Conservation Area Advisory Committee
- Hilson Moran
- General Projects Ltd
- The Arch Co
- Shaftesbury Capital PLC
- British Museum
- British Land
- London Property Alliance
- Highgate Society
- Belsize Society

Main Issues	Councils Response
A whole building approach is not always practical when the entire building is not under one ownership and there can be leasing restrictions. Acknowledgement of ownership or leasing restrictions should be made within the supporting text to Policy CC5.	The policy states that building retrofit plans are recommended, rather than being a requirement, providing appropriate degree of flexibility.
Installing PV panels for railway arches will often not be possible due to a lack of roof space. Amend Part C as follows: "To improve the sustainability of existing buildings, we strongly encourage schemes that alter, extend and/or convert	Part C "strongly encourages" rather than requires the listed sustainability measures. It is therefore not necessary to add reference to feasibility.

Main Issues	Councils Response
existing buildings to incorporate one or more of the following measures, where feasible and appropriate to the scale or nature of the proposal:"	
Suggest references to green roofs are amended to read living roofs.	The term 'green roofs' is well-established and we consider it reasonable to retain the terminology.
Suggest the addition of the following bullet points to Policy CC5. C. 8 Retrofitting will entail removal of hard surface and its replacement by vegetated natural soft surface and blue infrastructure (e.g. ponds), to act as carbon sinks, wherever possible. C.9 Adopted Building with Nature Standards are to be incorporated into improvements to existing buildings.	The removal of hard surfaces is promoted in Policy CC11 (Sustainable drainage) and is not considered necessary to include in Policy CC5. It is not considered necessary to add reference to 'Building with Nature Standards'.
Policy CC5 is welcomed and CC5D is strongly supported.	Support welcomed.
The policy requirements in policy CC5 are too prescriptive and whilst it is recognised that these should be 'appropriate to the scale or nature of the proposal,' further guidance on the scale of proposals to which policy CC5 would be applicable should be provided, to ensure the policy is sound.	Policy CC5 is not considered to be too prescriptive. Part C 'strongly encourages', rather than requires, the measures set out and, as noted, the measures should be appropriate to the scale or nature of the proposal.
Supportive of part B of this policy which recommends whole building retrofit plans where works are proposed to a listed building and the supporting text for this policy which references the most recent Historic England guidance note on adapting historic buildings for energy and carbon efficiency.	Support welcomed.
The Energy Use targets have not been included in CC5 On part C about ideas for improvement, most of the ideas are part of the consequential improvements for Partly.	While Building Regulation Part L consequential improvements may be considered a similar approach, the policy relates to low carbon heat, maximising solar pv, and using Space Heat demand and Energy Use Intensity targets as a method to reduce carbon emissions.
There should be a clear guidance on a minimum requirement for PVs in order to make them meaningful. There are many schemes with such limited area where there is always the conflict between green roof or PVs (due to fire risks).	It is not considered appropriate to specify a minimum area as every site and building are different. The approach to maximise the generation of solar pv is considered appropriate.
In addition, if measures are listed based on priority, external shading could be before PVs and heat pump installation should be reviewed if mechanical design proves is more efficient can work with existing systems and also there is a minimum thermal envelope performance. We suggest to have a feasibility study for heat pumps on existing buildings.	The list of measures have not been organised based on priority. It is not clear why this policy would require a feasibility study for heat pumps on existing buildings as heat pumps are encouraged (among others) as a retrofit measure.
Para 8.67: We can't see any reference to an Article 4 Direction for Parkhill and Upper Park or Elsworthy Conservation Areas on Camden's website.	There is no Article 4 Direction in Parkhill, Upper Park, or Elsworthy Road Conservation Area.
Para 8.71: Insert "or in a conservation area" after "listed buildings".	Heat pumps are permitted development in conservation areas provided that they meet permitted development criteria. No change required.
Policy CC5.C. This should explicitly mention improving air tightness of buildings and prioritise mechanical ventilation, specifically with air filtration and heat recovery.	The measures suggested in Policy CC5 C contribute towards improving air tightness. Mechanical ventilation is also noted.
8.66. Suggest the council considers referring explicitly to vacuum glazing as an encouraged and supremely better performance alternative to single glazing / secondary glazing in specific heritage contexts.	We note that Historic England Guidance (Adapting Historic Buildings for Energy and Carbon Efficiency) states "The use of slim-profile or vacuum double-glazing can allow the installation of double-glazing in historic buildings alongside the retention of existing window frames". We will propose a modification to address this.
8.69. 'Draught-proofed' is anachronistic and implies sealing only gaps around windows and doors. 'Achieves a high level of airtightness' refers to the performance of the entire built fabric - windows, doors, but also walls, roofs, floors - and this should be highlighted.	Paragraph 8.69 references both insulation and draught proofing. Camden's 'Decarbonising Camden's existing buildings' study found that heat pumps alone have a significant impact in reducing carbon emissions but coupled with other retrofit measures such as insulation and draught proofing can improve the efficiency of the heat pump. It is not considered necessary to include further information on air tightness in this paragraph, it is noted under ventilation as increased air tightness can increase issues with moisture build-up and indoor pollution.
Draft policy CC5 should recognise that responsible retrofit also involves finding the right land use for an existing building and that this should take priority or at the very least be a consideration in the application of policies.	Policy CC5 aims to support and encourage retrofitting for climate mitigation and resilience. It does not relate to land use, and is not considered the best place to include consideration of land use and existing buildings.

Main Issues	Councils Response
The requirements in Policy CC5 are too prescriptive and, whilst it is recognised that these should be “appropriate to the scale or nature of the proposal,” further guidance on this should be provided to ensure the policy is sound.	The wording of Policy CC5 is not considered to be too prescriptive. Part C 'strongly encourages' rather than 'requires' measure to improve the sustainability of buildings, and, as the response notes, measures should be appropriate to the scale or nature of the proposal.
Have concerns about the siting of heat pumps where there are very small outside spaces which can create considerable and persistent, though often low level, noise nuisance. Would like policy amendment to state that each application requires special consideration and due to the heterogenous and dense nature of our area with many converted properties, the standard ways of measuring noise and vibration and visual nuisances, for instance, will not necessarily protect neighbours from harm and more subtle assessments will be needed. We would like specific expertise to be available in the council to advise applicants before submission and neighbours seeking advice.	Applications are assessed against all relevant Local Plan policies. The Plan's approach to the consideration of noise impact is set out in Policy A4 Noise and Vibration. All applications are assessed taking into account their specific context and circumstances. No change to the Plan wording is considered necessary. The availability of expertise for applicants and neighbours is not a matter for the Local Plan.

Policy CC6 – Energy use and the generation of renewable energy

Number of representations: approx. 27

Representations received from:

- Riverside and Country Partnerships
- Hilson Moran
- The Arch Co
- Shaftesbury Capital PLC
- St George West London
- British Museum
- British Land
- Unite Group PLC
- London Property Alliance
- Highgate Society
- Environment Agency

Main Issues	Councils Response
The threshold for part C & D should apply to majors only. It is overly onerous to require schemes involving reprovided floorspace to meet these energy efficiency standards, in particular works involving listed buildings. It is however acknowledged that the Council has included some flexibility to allow non-compliance with some sustainability targets if it can be demonstrated that these are not feasible, which is supported. It is incredibly difficult for refurb/ retrofit projects to achieve BREEAM 'Excellent'. It is unclear how the space heating target (Item 3a) can be higher than the overall total building Energy Use Intensity targets (item 4a) for existing buildings. Further review of the space heating target and Energy Use Intensity targets in Part 3 and 4 are required.	The threshold for Policy CC6 Part C and D relates to new or reprovided floorspace. Reprovided floorspace being that which has been partially demolished. This is separate to existing floorspace. The approach is not considered to be overly onerous. The space heating demand relates to the heat energy needed to heat a building over a year, whereas the energy use intensity relates to the amount of total energy needed to run a building over a year. In existing buildings where less intrusive fabric measures are undertaken the space heating demand may be higher than the energy use intensity, particularly where the heating system proposed is an efficient low carbon system / heat pump. The targets have been informed by energy modelling; detail is provided within 'Decarbonising Camden's existing buildings 2024'.
The standards in parts C and D are too restrictive and should be amended to incorporate flexibility. Achieving sustainability improvements can be difficult due to spatial restrictions, occupier requirements and overarching requirements of Network Rail. It may not be possible for development to be fossil fuel free and use low carbon heat. Local Plan should balance all 3 strands of sustainability in line with NPPF's definition of sustainable development.	It is the expectation that most development in Camden should be able to utilise fossil fuel free – low carbon heat systems. The policy has been worded with sufficient flexibility to take account of situations where it is demonstrated that sustainability improvements cannot be made. With regard to Policy CC6 part D the expectation is for developments to achieve BREEAM excellent, if there are reasons why this cannot be achieved however, then the policy allows for this to be demonstrated and considered as part of the planning application.
Policy CC6 does not reflect the Government announcement made in December 2023 on setting local energy efficiency standards. It is clear that: “the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations”. Whilst options testing has been undertaken in the Council's Delivering Net Zero (May 2023) evidence base document, no further review has been undertaken and we still question whether a review been undertaken to see how the EUI and	The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. The Written Ministerial Statement provides for local energy efficiency standards that go beyond current or planned buildings regulation provided these have a well-reasoned and robustly costed rationale. Policy CC6 has been informed by commissioned evidence 'Delivering net zero' with extensive energy modelling for the building typologies. A Topic Paper on CC6 Energy and the generation of renewable energy has been prepared to provide further information to the Inspector on the approach taken.

Main Issues	Councils Response
renewable energy targets can be applied in real life examples.	
The policy requirements in policy CC6 are too prescriptive and in some cases unachievable. For example, Part A states the Council will expect all new buildings and developments where some existing built fabric is retained to meet the requirements set out in parts 1-4. It should be recognised that where parts of the building are being retained this will be more challenging to meet the requirements set out in this policy and is in conflict with other aspirations in the document which seeks to prioritise reuse of buildings.	Policy CC6 Part A applies to new buildings, and developments where some existing built fabric is retained - this would cover situations where, for example, a façade, foundations, or building core is retained. The expectations in Part A are considered to be achievable in these circumstances. Under A.3 the policy allows applicants to demonstrate that energy use intensity targets are not feasible. Policy CC6 Part C is concerned with existing buildings, where there is a greater degree of retention.
Part C of the policy sets out the proposals for works to an existing building, which is too prescriptive and would not be viable for some developments to meet, we therefore suggest this part of the policy is removed.	The policy approach in CC6 is informed by the evidence report 'Decarbonising Camden's existing buildings' which carried out detailed energy and cost modelling. The policy recognises that every building and site has different constraints and allows for it to demonstrated to the Council's satisfaction that measures are not feasible.
The offset payment is, however, currently inconsistent with the London Plan. There is no guidance on how this offset payment would apply to referable applications where the GLA adopt a Part L model. The supporting text states that the offset payment is based on the cost of providing that capacity if the space had been available. The rate is based on the cost of deploying a certain type of renewable energy system, rather than the cost of offsetting carbon emissions, which is the ostensible purpose for which the s106 funding is being collected. This element of the policy is therefore unsound and should be removed.	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with the ambitions of the London Plan. Referable applications would need to demonstrate compliance with the London Plan (percentage improvement against Part L) and policy CC6. The energy offset would apply when the Energy Use Intensity of a building is higher than the renewable energy generated on-site (a carbon offset following Part L building regulations would not be required).
The previous part iv (Regulation 18 version) - which reduced the requirement for reduction in energy demand for heating in listed buildings – has been removed from the current draft. BM regrets that this important recognition of the potential constraints posed by listed buildings has been lost and this risks undermining other policies in the Plan that support an approach that appropriately balances sustainability and heritage considerations. In contrast, the BM welcomes the recognition in the supporting text of the Regulation 19 version that there may be constraints - such as heritage – to achieving the requirement for non-residential development involving the conversion/extension of 500sqm or more to achieve a minimum of BREAM Excellent. It suggests that the same flexibility for sites with heritage constraints should apply to the whole of Policy CC6 and that this is essential so that it does not conflict with other policies in Chapter 08 or in other parts of the Plan.	The target levels for existing buildings in Policy CC6 are lower than those set out in the Regulation 18 draft Local Plan. The policy also provides flexibility, noting that where the target levels cannot be achieved justification can be provided.
The BREEAM requirement seems to have moved to this policy now CC6 now called energy use & the generation of renewable energy.	Comment noted.
There has to be an appreciation of building being designed now. Currently a whole building energy consumption of 70KWH/m2(GIA) is not achievable, especially when talking about all different categories of office, retail, education and GP surgeries. All those types have totally different patterns of usage. In addition, it is good to have the whole building targets but there are so many assumptions on the tenancy side where it might be better to have a target for base build and whole building, at least for the office and retail. It is suggested that targets are reviewed and adjusted based benchmarks such as NZCS, UKGBC office buildings targets, etc. Stepped targets for the years to follow make more sense.	The target EUI levels in Policy CC6 have been informed by commissioned evidence 'Delivering net zero' with extensive energy modelling for the building typologies.
The 20KWhm2(GIA) for heating in new developments with some existing elements can be tricky. Needs more specifications around existing fabric.	If the development includes existing elements and is required to be assessed under CC6 A, these existing elements would be taken into consideration depending upon the proportion of existing elements retained.
The targets for existing buildings are way more relaxed in some occasions compared to the new built, mainly on the residential.	Comment noted.

Main Issues	Councils Response
BREEAM assessing in developments of more than 500m2 is a threshold used in other councils too. However, there has to be a consideration of difficulties especially on retail units that are developed to shell only. Some credits can't be achieved for a min. of BREEAM Excellent with the current scheme (v6.1 and RFO 2014). Also, for some refurbishment even if they are more than 500m2, the scope of works don't allow many credits to be included, so this needs to be taken into account and have targets for different uses or a clause saying about reviewing feasibility.	The Council Authority Monitoring Report shows all schemes able to achieve BREEAM Excellent as specified in the current Local Plan. It is not considered necessary to change the policy approach.
We support the combination of blue green roof and PV, however there are fire risks associated to green roofs and PV. Therefore, this has to be checked and aligned with that.	The installation of green and blue roofs will be considered on a case-by-case basis, bearing in mind issues such as fire risk.
The carbon offset with energy shortfall is a good idea, however, are there enough areas in the borough to have all the additional PV installations? It will be good to have other options too as probably the shortfall from all developments will not be only for PVs and for transparency is good to publish other options too.	Paragraph 8.86 states that funds collected in this way will be used to deliver carbon reduction measures in the borough.
It is unclear whether the BREEAM Domestic scheme is required for any residential development over 500m², or if BREEAM only applies to non-residential developments over 500m².	Policy CC6 D only relates to BREEAM non-domestic refurbishment.
For mixed-use buildings, how should BREEAM be applied? For example, achieving an Excellent rating will be challenging for Shell Only retail units due to the minimum standard required under Ene 01.	For mixed use developments, BREEAM would only apply to relevant parts. For complex developments, developers may discuss the project with BRE to determine the most suitable assessment approach.
Since BREEAM Version 7 has not been formally published, it is currently unclear how easily an Excellent rating can be achieved under this version — particularly regarding the minimum standards in categories such as Energy, Water, and Materials, as well as the additional minimum credits required under other sections of the policy (e.g., Water).	If updates to BREEAM are formally published, the credits under Energy, Water, and Materials will be reviewed in Camden Planning Guidance.
Policy CC6: Energy reduction in new buildings In the supporting text for this policy, we would recommend that a paragraph be added acknowledging that increased water efficiency can reduce requirements.	There are a number of interventions that can reduce energy use. It is considered that this detail is best included in supplementary guidance, rather than the Local Plan.
CC6.B. Suggest this is controlled by condition.	The monitoring requirement will likely be secured by condition or legal agreement.
Unite welcome operational Energy Use Intensity targets, however the targets proposed are considered unachievable and utilise out of date kWh/M2 for PBSA. Unite suggest that these are instead grounded in TM54 analysis and aligned with the NZCBS rather than the LETI guidance. The residential number outlined (35 kWhm/m2) is unachievable and outperforms even the best PH PBSA schemes. EUI should be reported against per bed in addition to floor area to avoid penalising highly efficient schemes.	The targets set out in Policy CC6 have been informed by the 'Delivering net zero carbon' Study. It is understood that student accommodation may have a higher EUI due to increased hot water demand. The policy is worded to enable it to be applied flexibility "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". Monitoring of EUI at submission and post occupation will help to understand how the policy is working.
• Unite disagree with the energy offset price of £1.32/kWh/year, stated in supporting paragraph 8.87. This figure is dramatically excessive and would prohibit any residential schemes particularly where the building footprint is tight. Recommendation: The EUI targets should be revised and energy offset pricing to reflect realistic, evidence-based benchmarks, aligned with the UK Net Zero Carbon Building Standard.	The targets set out in Policy CC6 are evidenced based. In the drive towards net zero operational buildings, new development is expected to meet an energy balance where renewable energy generation on-site (through solar PV) must match, or be in excess of, the predicted annual energy demand of the building (EUI). It is recognised that there may be instances where this cannot be achieved and the Council will seek a payment in lieu to offset the shortfall. 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. .
The Local Plan should accord with the Ministerial Statement of 13 Dec 2024 and should not seek to apply energy efficiency standards beyond those set by the government.	The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. Also, as the response notes, the Written Ministerial Statement provides for local energy efficiency standards that go beyond current or planned buildings regulation provided these have a well-reasoned and robustly costed rationale. The Council considers that it can demonstrate a well reasoned and robustly costed rationale and is preparing a

Main Issues	Councils Response
	topic paper on this issue to support the Plan at examination.
The Energy Use Intensity (EUI) policy is inconsistent with the London Plan and therefore premature in advance of the London Plan Review. The current approach adopted in the draft Local Plan does not include “well-reasoned and robustly costed rationale” as per the December 2023 Written Ministerial Statement, and is therefore inconsistent with national and regional policy and may therefore be considered unsound.	The London Plan requires all major development to be net zero carbon and as such Policy CC6 is in line with the ambitions of the London Plan. The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. Also, as the response notes, the Written Ministerial Statement provides for local energy efficiency standards that go beyond current or planned buildings regulation provided these have a well-reasoned and robustly costed rationale. The Plan has been subject to viability testing and its climate change policies are supported by evidence.
The energy offset payment is inconsistent with the London Plan. There is no guidance on how this offset payment would apply to referable applications where the GLA adopts a Part L model. The supporting text states that the offset payment is based on the cost of providing that capacity if the space had been available. The rate is based on the cost of deploying a certain type of renewable energy system, rather than the cost of offsetting carbon emissions, which is the ostensible purpose for which the s106 funding is being collected.	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with the ambitions of the London Plan. Referable applications would need to demonstrate compliance with the London Plan (percentage improvement against Part L) and policy CC6. The energy offset would apply when the Energy Use Intensity of a building is higher than the renewable energy generated on-site (a carbon offset following Part L building regulations would not be required).
The study underpinning this fee in draft supporting Paragraph 8.87 presupposes extensive use of photovoltaics (PVs) and is based on off-site carbon savings being achieved solely by PVs. This is clearly impossible in a dense and historic urban environment such as Camden and is both unreasonable and considered unsound. There does not appear to be any viability evidence to support the offset calculation. There is also an absence of any viability evidence to demonstrate the impact on individual developments. It is considered that the carbon charge as proposed is unjustified, would not comply with CIL Regulation 122 nor relevant London Plan policy, and would have a material, adverse effect on development viability in Camden.	The Delivering Net Zero Study stemmed from a combined authority study (Towards Net Zero Carbon: Achieving greater carbon reductions on site) in 2019. It was commissioned as authorities were noticing a large proportion of new development not seeking to achieve higher than the minimum on-site reduction of 35% beyond Part L Building Regulations with a heavy reliance on carbon offset to meet the London Plan net zero target. The policy approach was tested as part of the viability assessment of the Local Plan. This anticipates that the costs of addressing carbon reductions and energy efficiency are likely to decrease over time as research is conducted into more cost-effective ways of delivering carbon zero developments and developers invest in these technical solutions. The wording of the policy has been updated in the Submission Draft Plan to make it clear that where a payment in lieu is sought it “should be related to the scale of the shortfall, subject to viability” (see Policy CC6. A.4). This reflects an understanding that the cost of achieving net zero through an energy balance may not always be viable for certain development in parts of the borough.

Policy CC7 – Heat networks

Number of representations: approx. 4

Representations received from:

- Hilson Moran
- General Projects Ltd
- Unite Group PLC

Main Issues	Councils Response
The updated policy document has acknowledged that existing energy networks rely on local fossil fuel combustion and may provide higher carbon energy than can be achieved by building systems. Nevertheless, the policy continues to include CHP, and prioritise connection to existing networks. The Council should evolve the London Plan's Heating Hierarchy to account for the status and absence of decarbonisation plans and execution for the borough's existing networks. Possibly a review between on site generation/installations and DH connection should be looked at planning Stage to be able to confirm that this is the most appropriate solution for each development, as suggested in comment for Policy CC5.	Policy CC7 (Heat networks) takes account of the approach taken in the London Plan, and London Plan Guidance on existing decentralised energy networks and decarbonisation.
Draft policy CC7 should recognise there are challenges associated with connecting to existing heat networks which	The approach is consistent with London Plan Guidance on Energy Assessments, referenced in the supporting text of

Main Issues	Councils Response
rely on fossil fuel and that it is more sustainable for on-building all electric plant to be prioritised in the short term.	policy CC7. This 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).
Recommendation: The policy should be amended to allow for flexibility for major developments to pursue the lowest Whole Life Carbon option.	There is no restriction against providing further information on heating solutions such as a Whole Life Cycle Carbon Assessment. Policy CC7 is in line with the London Plan and GLA Energy Assessment Guidance where once demand for energy has been minimised, all planning applications must demonstrate how their energy systems will exploit local energy resources.

Policy CC8 – Overheating and cooling

Number of representations: approx. 12

Representations received from:

- Hilson Moran
- Shaftesbury Capital PLC
- British Museum
- British Land
- London Property Alliance
- Highgate Society
- Environment Agency
- Redington Frognal Neighbourhood Forum
- Belsize Society

Main Issues	Councils Response
Object to requirement to offset energy used: does not take into account site characteristics such as roof-space, design, heritage assets or ownership/leasing restrictions. Use of design measures such as shutters, blinds, cooling from or changes to window sizes is almost always not possible from ground floor commercial units which rely on active and open frontages for trading. Policy could impact on the long-term viability of buildings.	The supporting text at paragraphs 8.111 and 8.118 sets out that applicants should demonstrate that they have considered the potential impacts of overheating and the ability to use passive design measures for cooling where feasible following the cooling hierarchy. The policy does not prevent active cooling where this has been demonstrated to be necessary. Mitigation measures for active cooling is similarly expected "where feasible", as set out in paragraph 8.119.
Suggest Policy CC8 A1 is amended to read "support proposals which make use of nature-based solutions and 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;"	It is not considered that this additional wording is necessary. Further information on non-mechanical cooling is provided in the supporting text.
A definition is needed for natural (non-mechanical) cooling. Suggestion this could be "tree and hedge planting, especially to the west and south west of buildings".	Further information on non-mechanical cooling is provided in the supporting text.
Suggest paragraph 8.113 includes the following bullet point "Blue infrastructure, such as wildlife ponds, should be incorporated, wherever possible".	Agree blue infrastructure provides cooling. We will propose a modification to the supporting text suggested.
Passive cooling measures often add cost and disrupt the environmental controls on floor, as well as creating operational/management issues. An acknowledgement of market demands and applying policy flexibly is important in encouraging commercial development.	Mechanical cooling is often associated with high energy demand. The cooling hierarchy, set out in the London Plan 2021, provides measures that should be used to manage heat risk. The installation of passive measures will reduce the cooling demand and as such should be integrated into the proposal. Where measures are not feasible these should be clearly set out in the planning application and this will be considered by the Council.
The BM continues to request that this policy is applied flexibly to major public institutions which will require a degree of cooling to manage large visitor numbers and a controlled climate required by much of the collection. Without such flexibility, this policy has the potential to undermine other key policies in the plan that seek to support key contributors to Camden's economy, such as the BM and other institutions with specific energy or infrastructure requirements.	The policy allows for active cooling where all feasible measures in line with the cooling hierarchy have been integrated and the need for cooling has been clearly demonstrated.
In grey text are the comments that have been addressed from previous review in 2024.	Comment noted.

Main Issues	Councils Response
Natural cooling is mentioned now 8.113. Policy CC8 Overheating and Cooling: Major development to undertake Overheating assessment in line with CIBSE guidance TM52 non domestic-TM59 domestic. Active cooling is unlikely to be accepted in new residential development. We support this policy.	
Policy CC8: Overheating and cooling We support this policy and recommend that reference is made to The London Climate Resilience Review 2024, which identifies heat risk as one of the principal climate risks for London.	We propose to include reference to the London Climate Resilience Review in policy preamble.
Reference should also be made to construction build-ups that naturally reduce overheating potential.	Agreed. The choice of building material can reduce overheating through thermal mass. We will propose a modification to address this.
The office market is likely to still require active cooling. Passive cooling measures often add cost and disrupt the environmental controls on floor, as well as creating operational/management issues. An acknowledgement of market demands and applying policy flexibly is important in encouraging commercial development.	Active cooling is a significant contributor to greenhouse gas emissions, contributes to raising local outdoor temperatures, and uses energy. There is clear justification to use the cooling hierarchy to drive down the cooling demand of buildings.
Draft supporting Paragraph 8.77 should be reworded to read: "Active cooling (air conditioning) and excessive mechanical plant may be acceptable where it is demonstrated to the Council's satisfaction there is a clear need for it (i.e. sterile internal air, for some non-residential uses) and all other passive measures have been integrated, where feasible ."	The wording of paragraph 8.77 quoted in the response comes from the Regulation 18 version of the Local Plan and does not appear in the Submission Draft. This matter is now covered in Submission Draft paragraph 8.118, and specifically refers to "feasible measures".
We emphasise the need for full objective appraisals of need for mechanical cooling and that other avenues have been properly explored and challenged We think there needs to be independent justification of the need for mechanical cooling systems	In line with policy CC8, applicants are expected to demonstrate that all passive design measures have been thoroughly investigated, and feasible measures that reduce the need for cooling have been installed, before considering the need for 'active cooling'. Reference to independent justification is not considered necessary.

Policy CC9 – Water efficiency

Number of representations: approx. 3

Representations received from:

- Thames Water
- Hilson Moran
- Environment Agency

Main Issues	Councils Response
Evidence has demonstrated that the 'fittings based approach' is more effective at ensuring the optional standard is complied with and the environmental discounts offered by Thames Water require this approach to calculation of water efficiency to be used. Suggest Policy CC9 is amended to read "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), or any higher standard that may be adopted. Proposals will be strongly encouraged to reduce daily water use even further than this where possible;"	Noted. Propose modification to Policy CC9 and supporting text to include the 'fittings based approach' as set out in Part G of the Building Regulations.
The three criteria essentially say that water will be recycled - suggest that the wording is restructured and that start with all buildings are required to rainwater harvesting.... (this will also benefit the water quality in rivers by reducing storm sewer overflows. Then, the policy can say this can either: be supplemented / replaced by grey water recycling - to achieve WAT01, etc., or 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.	Policy CC9 (Water efficiency) has been drafted to encourage water efficient measures for all development, including appropriate requirements for new residential development, major development, and intense water use developments.

Main Issues	Councils Response
Policy CC9: Water efficiency While we trust that this policy is sound and welcome the requirement for residential development to achieve a water efficiency of 110 litres of water per head per day; we would request the council to consider recommendations from our Regulation 18 response (dated: 13 March 2024), which we believe can make the policy more robust and effective.	Without further evidence to justify the feasibility of higher levels of water efficiency the Local Plan is not able to include 85 litres per person per day as a requirement at this time.

Policy CC10 – Flood Risk

Number of representations: approx. 12

Representations received from:

- The Heath and Hampstead Society
- Hilson Moran
- Highgate Conservation Area Advisory Committee
- Environment Agency
- Redington Frognal Neighbourhood Forum

Main Issues	Councils Response
Suggest Policy CC10 is amended to include: C. 1. The planting of trees with a high-water requirement, e.g. poplar, willow and oak, will be prioritised, together with hedge planting. C. 2. The incorporation of ponds and daylighting of lost rivers will be favourably considered.	It is not considered that this additional wording is necessary for Policy CC10 (Flood risk). However, the use of trees for water absorption can be incorporated into the supporting text of Policy CC11 (Sustainable drainage). The incorporation of ponds and daylighting of lost rivers is not considered necessary to include into Policy CC11 as developers are required to follow the drainage hierarchy.
Suggest paragraph 8.136 is amended to require applicants to note the location of spring lines and lost rivers.	It is not considered that this additional wording is necessary. The Council's Strategic Flood Risk Assessment, Environment Agency surface water flood maps, and any other modelling published on the Council's website is considered sufficient.
It is necessary for development to reduce pressure on the sewer system, and that the excavation of natural wildlife ponds can be very successful for attenuation.	Comment noted.
Noted that previous comments have been addressed.	Comment noted.
Policy CC10: Flood Risk We are supportive of this policy and have no further comments since our Regulation 18 response.	Support welcomed.
There are aspects of CC10 Flood risk that are not sufficiently supporting flood risk in Camden, and that it omits the requirement in the NPPF to ensure that flood risk is not increased elsewhere.	Policy CC10 Flood risk has been drafted in accordance with national policy to ensure that flood risk will be mitigated over the lifetime of a development and that it will not increase flood risk elsewhere.
Background and evidence of flooding in Camden provided in response. Paragraph 12.115 of the CLP states that it is important that basements do not cause drainage or flooding problems. The NPPF (December 2024) still requires (as it has done since it first came out in 2012) that development should not increase flood risk elsewhere, and, where possible, reduce flood risk overall, but this is not being required/enforced. We consider that it does not include all the areas that impact on flooding or, could be involved in mitigating for the impact of flooding in the CLP (2025). One key opportunity is for the NPPF with regards to the impact on flood risk elsewhere to be applied to planning policies for all areas involving all sites in reducing surface run-off, systematically gathering data on groundwater flooding incidents, and in holding back and slowing all water through the riparian and sewer systems at every opportunity as a requirement during planning processes.	Policy CC10 Flood risk takes account of all sources of flood risk as required by national planning policy. The policy states that site specific Flood Risk Assessments are required for all basement development, as part of this assessment it is required to set out how the risk of flooding will be mitigated over the lifetime of the development, without increasing flood risk elsewhere.

Main Issues	Councils Response
Camden is also urged to encourage the British Geological Survey to gather this data, and Building Control to ensure it is always captured and reported, though it is acknowledged this is outside the scope of CLP review. Most CLP sections on flooding are concerned with reducing risk to the site, some consider the neighbours, but there is almost no consideration of the groundwater sent more directly and faster to the sewers adding to the risks of sewer surcharging that can occur during storms. Developers are merely required to ask for permission from Thames Water to send their groundwater to the sewers. We note that many of the Allocation Site reports in chapters 3-5 state they are within the Secondary A Aquifer. Concerns are expressed about foundation works extending 20m+ below ground surface: a risk they will extend through the London Clay and affect the groundwater in sensitive aquifers. This rightly considers risks/effects on groundwater, but there is no indication that groundwater can provide a risk to a development or to others.	Policy CC10 Flood risk requires site specific flood risk assessments to account for all sources of flood risk, which includes groundwater. The Council's Strategic Flood Risk Assessment includes data from the BGS which illustrates areas of the borough where there is susceptibility to groundwater flooding. The information relating to Secondary Aquifers in the borough relates to Policy NE4 Water quality.
Silt blockage of sewers is now recognised as the main problem for the South End Flood Zone.	Comment noted
Footnote 63 of the NPPF also clarifies that in Flood Zone 1, an assessment should accompany all [our italics] major sites (involving 1 hectare or more) for land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use. In Camden, where the geology is complex for a large range of reasons, it seems that developers' experts are not always aware of potential vulnerability. We believe that variation in local geological conditions mean that all such major sites throughout Camden should require an assessment to search for vulnerable sites prior to planning permission and certainly prior to first breaking ground.	Policy CC10 Flood risk accords with national policy in that sites covered by footnote 63 are required to submit a site specific flood risk assessment.
We consider that Camden should include the following policies for CC10 requiring that: • All developments involving significant soil removal or groundwater diversion—including basements and large extensions—should consider incorporating appropriate on-site attenuation measures, such as Sustainable Drainage Systems (SuDS), to ensure that flood risk is not increased elsewhere in the borough. • Site-specific Flood Risk Assessments must consider both site-specific and cumulative impacts, and demonstrate how the development will manage surface and groundwater sustainably, fully in-line with the NPPF and the CSFRA. • Where it is not feasible to achieve greenfield run-off rates through merely improving permeability, applicants must provide robust justification and demonstrate that alternative measures on-site, or off-site by a contribution to public measures to mitigate for storms, will minimise flood risk.	Policy CC11 Sustainable drainage requires all development to follow the London Plan drainage hierarchy to reduce surface water. A drainage report should be submitted for all basement planning applications - this involves the 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. Site specific flood risk assessments are required to consider all sources of flood risk in line with the NPPF and is expected to demonstrate that flood risk will not be increased elsewhere. Policy CC11 Sustainable drainage requires all major development to reduce surface water run off to greenfield rates, unless it is demonstrated to the Council's satisfaction that this is not feasible.

Policy CC11 – Sustainable drainage

Number of representations: approx. 12

Representations received from:

- The Heath and Hampstead Society
- Hilson Moran
- Environment Agency
- London Property Alliance
- The Arch Co
- Primrose Hill Conservation Area Advisory Committee
- Thames Water
- Woodland Trust
- Redington Froggnal Neighbourhood Forum

Main Issues	Councils Response
A, C and D should be amended to refer to major new build development. Incorporating SUDS into rail arch development will in most cases not be possible. The specific challenges of railway arches should be recognised in the supporting text.	The Policy is considered to already provide appropriate flexibility. Part A states that drainage rates should be reduced "as far as practicable". The supporting text to part C states "The Council will require major applications...to utilise SuDS to achieve greenfield run off rates, unless it is demonstrated to the Council's satisfaction that this is not feasible." We consider it reasonable to expect drainage reports for major developments situated in flood risk areas - many schemes involving railway arches are likely to fall beneath this threshold.
Water runoff should be more stringent in the Counters Creek catchment area. Suggest Policy CC11 E is amended to read "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 below the greenfield run-off rate as feasible."	We agree that development within the Counters Creek catchment area should aim to go beyond greenfield run-off rates where feasible. We will propose a modification to Policy CC11 and supporting text.
Policy CC11 is welcomed.	Support welcomed.
In order to ensure consistency with the London Plan Part A of the policy should require all development to aim to achieve greenfield run-off rates. To ensure that the policy is consistent with the London Plan part A of Policy CC11 should be revised to read: "All development proposals should follow the London Plan drainage hierarchy to reduce surface water run-off rates as far as practicable and aiming to achieve greenfield run-off rates...."	It is not considered appropriate to request all development to achieve greenfield runoff rates.
In relation to part E of Policy CC11, the Counters Creek catchment has been subject to issues of sewer flooding. The sewer network within London is a combined system and as a result the system can surcharge during storm events with basement properties at particular risk. While basement properties are at greatest risk, any development can contribute to, or reduce, this risk by adding more surface water flows to the combined network or by removing or attenuating surface water from the network however, amendments to Part A of the policy would likely make the requirements of Part E a duplication. For basement development, additional water can be discharged to the sewer network through dewatering to prevent groundwater ingress. As a consequence, the policy should seek for basement development to offset this impact by going being green-field run-off. Potentially this could involve retrofitting of SuDS within the development site. Since the publication of the Regulation 19 Local Plan the National Standards on SuDS have been published. The requirement to comply with the National Standards should be referenced within the Policy/supporting text to ensure the policy is sound. In order to ensure that the Local Plan is effective at reducing sewer flooding risks it is considered that Part E of the Policy should be revised as set out below: In the Counters Creek catchment area (shown on the Planning Policies Map) applications for Basement development, will be required to offset any impacts of basement water entering the sewer network by reducing surface water discharge from the site beyond greenfield run-off rates. 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. The supporting text for the policy should also be revised to state that: New basement development should offset any discharge of basement water, such as from water from dewatering that is discharged to the sewer network to prevent water ingress, by going being greenfield run-off rates. This could be achieved through the retrofitting of SuDS measures within the wider site. SuDS proposals for new development will be required to comply with the National Standards for SuDS.	We agree that development within the Counters Creek catchment area should aim to go beyond greenfield run-off rates where feasible and that the national SuDS standards should be mentioned. We will propose a modification to Policy CC11 and supporting text.

Main Issues	Councils Response
The first point can be removed, as Policy CC12 has amended the wording to require permeable surfacing a green and blue roofs "where feasible".	Comment noted.
The second point refers to letter C within Policy CC12. The policy wording requires all major developments to reduce run-off rates to greenfield rates, whereas in Section 8.155 it is stated that "Where it is not possible to achieve greenfield run-off rates, run-off rates should be as close to this as possible". This should be reflected within letter C in Policy CC12.	Paragraph 8.155 expands upon policy criteria, it is not considered necessary to include this within the policy text.
Policy CC11: Sustainable drainage We welcome the amended policy wording under clause C of this policy. We are pleased to see the inclusion of SuDS guidance in paragraph 8.157 and would like to re-share the following resources that can be extremely beneficial while designing efficient SuDS: • The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13 • The CIRIA C753 SuDS Manual.	Further guidance and links will be provided with the Council's Planning Guidance.
We welcome the inclusion of reference in C1 that SUDS should be designed to provide multifunctional benefits, maximise urban greening and be integrated into the development.	Support welcomed.
We highly commend Camden for its CC11 policies, aiming to reduce surface run-off by limiting impermeable surfaces and applying a sustainable approach to drainage. Consider greenfield run-off rates should apply to all planning applications. We request that this be extended to all developments and not just those of 'major developments, basement development, and other flood-vulnerable development (such as homes, health services, residential institutions and education) in areas identified at risk of flooding' (CC11 para 8.158).	Criteria such as reducing surface water to greenfield run-off requires detailed information to be submitted through a drainage report. It is considered unjustified to require all developments in the borough to meet greenfield run-off rates. However Policy CC11 Sustainable drainage requires all development to seek to reduce surface water in line with the drainage hierarchy as far as practicable.
We consider that Camden should include the following policies for CC11 requiring that • The removal of ground capable of absorbing or facilitating the passage of any groundwater, or • Diversion of groundwater straight to the sewer system should a) be appropriately tested for its likelihood at the planning stage, including through a period of rainstorm, then b) it be required that any groundwater diversion to the sewer system be fully mitigated for on-site by appropriate storm attenuation.	The impact of basement development on the water environment and drainage is already covered by Local Plan policies on Basements and Sustainable drainage. Policy D6 Basements requires submission of a Basement Impact Assessment, this includes assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability. Policy CC11 Sustainable drainage requires applications for basement development to submit a drainage report.
Policy CC11 (Part A) is too prescriptive and should be about referencing SUDs principles rather than requiring specific measures. It should also only apply to major developments.	Policy CC11 Part A does not require all development to install sustainable drainage systems. This part of the policy is intended to ensure all applicants consider water drainage for the benefit of their site which could contribute to wider cumulative benefits in a local area. This is in addition to ensuring development uses permeable surfaces and includes green and blue roofs where feasible. CC11 Part C requires 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."

Chapter 9 – Delivering an Inclusive Economy

Number of representations: approx. 5

Representations received from:

- The Arh Co
- British Land
- London Property Alliance
- Highgate Society

Main Issues	Councils Response
Ensuring arch spaces are occupied with active employment uses including a range of use classes depending on location is more critical than ever now that London has experienced the loss of so much of its supply of smaller commercial spaces.	We consider the Local Plan's policies are reasonable and proportionate. Any measures sought through a planning obligation will vary depending on the nature and scale of a development scheme, its location and impacts (as set out in paragraph 15.19). The majority of arch developments

The current planning regime too often acts as a brake on economic growth, a consistent and responsive planning system that can offer more certainty to investors will ultimately increase the speed and amount of private investment going into London's built environment. Many modern-day occupiers within the arches do not and cannot operate under traditional use classes. Flexibility is therefore required in the Local Plan to enable growth and employment opportunities arising from a range of use classes. Concerned about public realm proposals adjacent to viaducts which compromise the continued operations of occupiers of the arches and adversely affect the public highway / railway network. This is particularly the case for industrial/semi-industrial occupiers who need some vehicular access for their operations (deliveries etc.). Other planning policy requirements are often applied in blanket fashion with little or no consideration to the spatial constraints of arches and the limited ability to carry out works above/close to arches due to Network Rail ownership/operation restrictions. This is in respect of matters such as cycle parking, energy, open space, greening, biodiversity targets etc. One particular issue is affordable workspace policies. There should be an acknowledgement of these challenges and policy requirements should be applied with a degree of flexibility. Enabling appropriate flexible temporary and meanwhile uses in arches should be strongly encouraged, where feasible.	are likely to be small in scale and therefore policy requirements relating to major schemes in the Local Plan will not apply. Policy IE1 of the Local Plan sets out support for temporary/meanwhile uses at A (8).
Supports the aim of the policies to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to, and share in, the borough's economic growth. The introductory paragraphs of chapter 9 should recognise the role of railway arches and need for flexibility	Support welcomed. The introduction to Chapter 9 is focussed on the main challenges and opportunities for growing a successful and inclusive economy in Camden, and therefore additional text on railway arches and flexibility is not considered necessary or appropriate.
We welcome the Plan's support to ensure a continuing supply of commercial development to deliver growth and innovation.	Support welcomed.
Chapter 9 - Delivering an Inclusive Economy In general we welcome the provisions of this chapter.	Support welcomed.
We strongly support the principle of growing a strong, diverse and inclusive economy and enabling residents, businesses and the voluntary sector to share in the borough's economic growth. We welcome the Plan's support to ensure a continuing supply of employment development to deliver growth and innovation.	Support welcomed.

Policy IE1 – Growing a successful and inclusive economy

Number of representations: approx. 7

Representations received from:

- Lab Tech
- Reef and Partners
- General Projects Ltd
- The Arh Co
- Kentish Town Neighbourhood Forum
- London Property Alliance

Main Issues	Councils Response
The planning system is not the appropriate vehicle to address the provision of childcare facilities to support working families. We therefore question its inclusion. The market should dictate the need to provide digital connectivity to support occupiers. This is not a planning requirement and we therefore question its inclusion.	Childcare provision and digital connectivity are appropriate matters for planning policy and the approach in the Local Plan is considered to be consistent with national and regional policy. Digital connectivity is addressed by paragraph 119 of the National Planning Policy Framework and Policy SI 6 of the adopted London Plan. Childcare provision is addressed in London Plan Policy S3 Education and childcare facilities.
Criteria relating to the provision of childcare facilities and digital connectivity go beyond what is appropriate for planning policy and should be deleted.	Childcare provision and digital connectivity are appropriate matters for planning policy and the approach in the Local Plan is considered to be consistent with national and regional policy. Digital connectivity is addressed by paragraph 119 of the National Planning Policy Framework and Policy SI 6 of the adopted London Plan. Childcare

	provision is addressed in London Plan Policy S3 Education and childcare facilities.
Strongly support the overarching objective of the draft policy (4) - request that this is applied flexibly (6) Dictating employment requirements for SMEs in arches is unlikely to be effective for most arch-based businesses - could disincentivise SME occupation; requirements should be applied proportionally and sensibly (8) Support promotion of meanwhile/ temporary uses but these should not be required.	Support for objective welcomed Part A.4 seeks to resist the loss of viable employment space, which is considered an reasonable and appropriate policy aspiration. Employment and training strategies are an established tool for ensuring that schemes deliver beneficial outcomes for Camden residents. The threshold is set at a level which means it will only apply to the largest of developments within railway arches. Meanwhile uses are primarily applicable to larger, phased schemes as paragraph 9.20 acknowledges.
The strategic aspirations of draft policy IE1 are supported.	Support welcomed.
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." KTNF supports this. Kentish Town has a diminishing supply of suitable premises due to factors such as permitted development rights.	Support welcomed
Reducing resource consumption. Paragraph 9.19 KTNF notes the integrated approach here, linking different policy areas and advancement on the previous local plan.	Support welcomed

Policy IE2 – Offices

Number of representations: approx. 24

Representations received from:

- GLA
- Lab Tech
- Primrose Hill Conservation Area Advisory Committee
- General Projects
- The Arch Co
- Shaftesbury Capital Ltd
- British Museum
- British land
- London Property Alliance

Main Issues	Councils Response
Support the reduction in the marketing period It is not necessary to require the space to be marketed by two agents if agent chosen is reputable.	Support welcomed. We consider the use of 2 agents to be a robust approach as sometimes agents may have significantly different expectations around the ability to let a premises and the rents that might be charged. Increasing the supply of housing in the Borough is an overarching objective of the Local Plan. We will only support change of use to housing where this is consistent with delivering good standard of accommodation.
Should remove references to discounted rent and incentives as these are not planning matters.	These are commonly used in the leasing of office space and something that prospective leasees will take into account as they have a bearing on the overall affordability of a property. We have clarified in the policy text that this is subject to viability.
If there is a lack of demand for a space, it is not reasonable to expect landowners to invest in reconfiguration. In most cases, internal alterations do not require planning permission.	We consider that Part C i) c) is reasonable: it is appropriate for reconfiguration to be explored as a means of attracting tenants, and before demand can be assessed.
Support reference to energy efficiency requirements being a barrier to the leasing of buildings.	Support regarding marketing period noted.
If there is no demand for office accommodation, there is likely to be no demand for affordable workspace. Reference to alternative use as housing / student housing should be deleted as this in many cases will not be best use of land.	The policy approach recognises that while there may no longer be a demand for larger, outdated office premises, there may still be an unmet need for affordable workspace in an area which a mixed-use scheme may be able to help establish. The Borough's Affordable Workspace Strategy has been developed because there is not a sufficient supply of affordable workspace in Camden that start-up businesses and entrepreneurs are able to afford. Certain sub-sectors such as some creative industries are also at risk of being squeezed out due to escalating operating costs.

Main Issues	Councils Response
Support the relaxation of the marketing period for proposals involving the loss of office floorspace. It is not commercially viable to leave a property in Central London vacant for 12 months. Consider a period of 6 months to be more appropriate	We do not consider that a further reduction in the marketing period would be reasonable. 6 months is too short a period to take account of changing economic conditions; it may also unnecessarily reduce the numbers of potential enquiries and viewings of a property.
Part C is too restrictive. Arch space used by small office businesses can be relatively short-term as businesses grow or move on. Criterion will act as a disincentive for The Arch Co to create new office space. Railway arches should be explicitly excluded from this criterion.	We consider that alternatives uses are already provided for in part (3) of the policy. This may not necessarily entail "reconfiguring" of premises, as mentioned in the policy, and we therefore propose an amendment to the policy text refer to the repurposing of office space, and associated additional wording in paragraph 9.37.
Policy IE2C is supported, especially in small centres.	Support welcomed.
The reduction in the length of the marketing period (from 24 to 12 months) required to justify a loss of office space is welcomed.	Support welcomed.
British Land does not however agree that consideration of discounted rents, incentives and flexible leasing arrangements (Part C 2) should be mandated by the policy. There is no planning justification for this.	Part C. 2. sets out reasonable matters for consideration as part of the marketing exercise and allows for consideration of feasibility and viability.
While it may be feasible to reconfigure office space, if there is a lack of demand for the space, it is not reasonable for landowners to invest in reconfiguring a building which is not fit for purpose. This requirement should be deleted.	The Council expects applicants to consider making changes to the layout/ configuration of a building if this would increase its attractiveness to potential occupiers / ability to be let. It is reasonable for the Council to expect applicants to explore reconfiguration as a means of attracting tenants, and before demand can be assessed. Any such works would be subject to viability.
Reference to the provision of affordable workspace should be deleted. If it is to remain, there should be clarity on the quantum of affordable workspace required.	The policy approach recognises that while there may no longer be a demand for larger, outdated office premises, there may still be an unmet need for affordable workspace in an area which a mixed-use scheme may be able to help meet. We envisage this is most likely to be feasible where ground floor space is repurposed. The amount provided will be subject to the specifics of individual sites and negotiation and therefore it is not considered appropriate to set out a required quantum.
Reference to premises which cannot lawfully be leased due to their energy efficiency performance requirements is welcomed.	Support welcomed.
Part D also states that states that where the Council is satisfied that a continuing office use is no longer feasible, the preferred alternative use is housing. We suggest this is deleted as, in many cases, such as in the CAZ or KQ, housing may not be the best use of the site.	Housing is the priority land use in the Local Plan and it is reasonable for the policy to set out the Council's preferred use. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. The reuse of redundant offices provides a potential means of providing housing in sustainable locations.
For large institutions such as the BM, spaces within its estate are required to serve different purposes over time, and may need to move in and out of different planning use classes – including as offices - to continue to fulfil the BM's needs. BM requests that this need is specifically acknowledged in this policy; without this amendment, this policy is at odds with others in the Plan (e.g. SC1, SC6) and the overarching aim of Policy IE1 to support and contribute to a successful Camden economy and wider offer. To achieve this, office or other employment spaces that form part of the estate of larger institutions should be excluded from this restriction on loss provided they continue to be used by that institution to support delivery of its offer. This could include cultural institutions such as the BM, but also others identified as being from growth or key sectors in the borough such as medical, life sciences, Knowledge Quarter or higher education institutions. Alternatively, it may be appropriate to restrict the application of this policy to floorspace over a certain size to allow smaller office spaces greater flexibility to change to alternative uses where they do not satisfy the demands of modern office occupiers.	We recognise the need for further clarification about the use of marketing exercises where offices form part of a large public estate, and will propose a modification to address this.

Main Issues	Councils Response
Draft policy IE2 is broadly supported. Part C of the policy is considered to be overly restrictive. 12 month marketing period is onerous and unnecessary in many instances. Even new market space is often not commercially viable in parts of the mid-town area.	We consider that 12 months of marketing is a reasonable and appropriate, as this takes into account fluctuations that can occur in the wider economic environment.
There could be many instances where buildings could be more easily retrofitted from office to residential, hotel or otherwise without the need for such extensive marketing processes. This could be introduced as a "retrofit fast track"	A retrofit 'fast track' could result in the wholesale loss of office floorspace as there is a wide variety of office types and sizes in LB Camden. As paragraph 9.38 notes, EPC ratings already make allowance for the cost of retrofit measures meaning that this issue is not necessarily a barrier to the continuing occupation of offices. The same paragraph acknowledges that, where it can be demonstrated by the applicant there are "exceptional challenges" to improving the energy efficiency performance of purpose-built offices, the Council will consider waiving the marketing exercise. This recognises the potential to repurpose the worst-performing stock, with housing identified by the Local Plan as the priority alternative use.
Office floorspace should be directed towards the CAZ, town centres and Opportunity Areas.	This is the approach taken in the draft Local Plan. Paragraph 9.34 states: "The Council will continue to steer office provision towards the Central Activities Zone and other centres commensurate with their size and function."
We support the overarching aims of Policy IE2 to manage and protect Camden's office stock to ensure that suitable and viable accommodation is retained, and welcome the specific support for ensuring a sufficient supply of space for research and development	Support welcomed.
The reduction in the length of the marketing period required (from 24 to 12 months) to justify a loss of office space in Policy IE2 (Part C) is welcomed. Reference to premises which cannot lawfully be leased due to their energy efficiency performance requirements is also welcomed.	Support welcomed.
Discounted rent and incentives are not a planning matter and are therefore unjustified and should be removed from Policy IE2 (Part C2).	We believe it is justified and reasonable to consider reductions in rent subject to it still being viable to let the premises. Incentives are not mandated but something that should be considered as part of the marketing exercise. Part C allows for the consideration of viability.
In most cases, internal alterations do not require planning permission and reference to this in Policy IE2 (Part C3) should be deleted.	Although internal alterations do not require planning consent, it is reasonable to expect applicants to explore reconfiguration if this would increase a premises attractiveness to potential occupiers / ability to be let, before demand can be assessed.
Reference to the provision of affordable workspace should be deleted from Policy IE2 (Part D). If it is to remain, there should be clarity on the quantum of affordable workspace required.	The policy approach recognises that while there may no longer be a demand for larger, outdated office premises, there may still be an unmet need for affordable workspace in an area which a mixed-use scheme may be able to help establish. The quantum will be subject to negotiation and will be informed by Policy IE4 Affordable workspace.
Where office buildings become redundant, the council's preferred alternative use is housing. This reference should be deleted as, in many cases, housing in the CAZ may not be the best use of land.	Housing is the priority land use in the Local Plan and it is reasonable for the Plan to state that this is the Council's preferred use when office buildings become redundant. The appropriateness of residential use on any particular site will be assessed against all relevant plan policies.

Policy IE3 – Industry

Number of representations: approx. 10

Representations received from:

- London Property Alliance
- Kentish Town Neighbourhood Forum
- YC CFQ Ltd
- Dominus
- The Arch Co
- Reef and Partners
- GLA

Main Issues	Councils Response
Support the overarching objective of Policy IE1 and criteria 1 and 5.	Support welcomed.

Main Issues	Councils Response
The range of uses in railway arches has diversified and is evolving. Arches at Hawley Wharf no longer compatible with new uses due to servicing and residential amenity. Part B has the potential to restrict the range of opportunities that could be delivered - particularly where an occupier falls across multiple use classes. Blanket protection of industrial uses could result in vacant space. Marketing is onerous, time-consuming and could lead to vacancy / under-utilisation of space. Traditional industrial uses may not be best suited for space or the local area.	We consider it is important to have a robust policy approach to ensure that a sufficient stock of space continues to be available for industrial/quasi-industrial uses in the borough. It is reasonable to prioritise the retention of industrial uses where there is a continuing demand which the marketing exercise would be able to demonstrate. Part B (1) acknowledges circumstances where the surrounding nature of the area has changed and therefore the site may no longer be able to support similar/alternative industrial uses. We also consider that the policy as drafted would support proposals involving 'quasi-industrial uses' or potentially mixed-use schemes - paragraph 9.49 states: "The Council seeks to maintain a diverse stock of industrial premises suitable for different users and activities... A significant number of premises are occupied by uses important for the local economy, including creative and cultural enterprises..." The Council would also support proposals that involved bringing back vacant/under-utilised arches back into beneficial economic uses. Our existing planning guidance states that a marketing exercise may not be requested where there is evidence of long-term vacancy (i.e. Paragraph 45 of the Employment Sites and Business Premises CPG).
Part B should recognise that the loss of industrial and warehousing can be acceptable where specified in a site allocation or in justified circumstances where being replaced by another economic / employment generating use, particularly in the Knowledge Quarter Aea.	Policy IE3 is intended to apply across all industrial sites and should be read as a whole. Together with the relevant site allocations, the policy already recognises the opportunity to intensify employment as part of a comprehensive planned approach to development, as set out in parts A and C and at paragraph 9.50.
Part C should recognise that the Local Plan identifies opportunities to intensify, relocate and cluster industrial uses. Loss of industrial floorspace is considered appropriate as the borough has planned for industrial capacity across the borough.	Part C recognises that the site allocations in the Local Plan identify opportunities to intensify large industrial and warehousing sites in the borough. Policy IE3 is intended to apply across all industrial sites and should be read as a whole. Together with the relevant site allocations, the policy recognises the opportunity to intensify employment as part of a comprehensive planned approach to development, as set out in parts A and C and at paragraph 9.50. Therefore, the intensification, relocate and clustering of industrial uses will be considered, subject to this forming part of a comprehensive planned approach to development.
It is not considered proportionate to require marketing exercises for the loss of these uses, particularly where a site (as is the case with the Parcelforce site) is subject to a site allocation which does not include these uses	Allocation S7 already identifies employment as a potential use. Given the limited stock of industrial land in the borough, including where this provides essential functions or services for the Central Activities Zone, we consider that the use of marketing evidence is a reasonable requirement as this would identify whether there is a continuing demand for an industrial-related use at this site. It should also be noted that a marketing exercise can capture changes in the wider economic context over time.
Support the requirement for development to be comprehensive and intensified employment-led, for example ensuring successful co-location of uses through innovative design approaches.	Support welcomed.
The draft Plan does not identify the amount of industrial capacity that is required to be delivered over the Plan period. This should be provided and broken down so that is clear what the need is for Class B uses. Draft Policy IE3 sets out a 'manage and protect' approach to the supply of industrial and warehousing land within the borough. This should be strengthened to ensure that sufficient supply is planned for to meet demand.	We do not consider it reasonable or practical to set a target for industrial space given the highly constrained nature of the borough, lack of sites to provide additional capacity and the critical need for the Local Plan to demonstrate that the borough is able to meet its housing target. The Local Plan therefore focusses upon safeguarding and intensifying existing sites rather than identifying new sites.
Policy IE3 is inconsistent with the strategic objectives of the draft Plan and national policy in terms of promoting growth and maximising benefits through a mix of uses. The policy should be more positive and refer to the need to balance the prioritisation of industrial/warehousing retention (Policy IE3 (Part B)) with other land use priorities, in particular residential as "the priority land use in the Plan" (Policy DS1 (Part A)) and also with land use provisions in site allocation policies. As drafted all these policies appear to compete without much clarity on how the planning authority will apply the planning balance.	The Local Plan supports the mixed-use intensification of industrial sites where appropriate through its policy approach and site allocations and is consistent with London Plan policy E7 Industrial intensification, co-location and substitution. The site allocations identify on which sites the intensification of employment/industrial uses is envisaged alongside provision of other land uses such as housing and an indicative housing figure is provided. These allocations have been guided by site capacity work which has considered the ability of achieving the indicative

Main Issues	Councils Response
	housing target alongside provision of employment floorspace.
The policy should emphasise the need to promote the creation of jobs across a range of flexible E/B use classes rather than focusing on the re-provision of industrial uses, particularly when a number of the existing industrial units and warehouses are vacant.	The approach to re-provision of industrial uses is considered to be in line with London Plan policy E7. The draft Local Plan supports the significant intensification of employment sites in the borough, which can provide for a range of different employment uses. The site allocations set out the types of land uses that would be acceptable for each site, including guidance on suitable types of employment uses.
KTNF welcomes the aim of reducing the footprint of distribution / logistics depots, which occupy about half of Camden's industrial land supply (c.18 ha.), including in Kentish Town. These land-hungry uses with extensive areas of vehicle parking provide relatively few jobs per square metre, which tend to be of poor quality with few prospects. We welcome the move to last-mile deliveries which should reduce the land take of the depots.	Support welcomed

Policy IE4 – Affordable workspace

Number of representations: approx. 22

Representations received from:

- London Property Alliance
- Lendlease and the Euston Landowners
- Unite Group PLC
- Kentish Town Neighbourhood Forum
- British Land
- Regal
- Lazari Investments Ltd
- St George West London
- The Arch Co
- General Projects Ltd
- Reef and Partners
- Primrose Hill Conservation Area Advisory Committee
- Lab Tech

Main Issues	Councils Response
20% affordable workspace at 50% market rent is wholly unrealistic and the target should be much less onerous. The average workspace delivered on schemes in Camden is usually less than 10% of the uplift in floorspace and at 80% of the market rent. The policy should be assessed on a site-by-site basis and factor in viability as well as other policy requirements.	Part A.2. of policy IE4 is clear that the Council will seek 20% of the net additional floorspace to be provided at 50% of the market rent as a working benchmark rather than a fixed requirement. The average delivery of affordable workspace quoted reflects the current policy situation where there is no target. Paragraph 9.65 already states: "The Council will negotiate with developers on a case-by-case basis having regard to all relevant circumstances, including scheme viability".
Question the need for affordable workspace - should be clear what the affordable workspace need is across LB Camden and the types of spaces that are required. There are already natural different pricing points in the rental market for commercial space leading to a natural range of rents across Camden. The proposed 20% affordable workspace floorspace requirement and the 50% reduction in market rent is a significant financial burden and viability concern. This is a higher requirement than many Central London boroughs and especially when combined with H2. There is a significant disparity between Camden and Westminster's planning policies and requirements.	Information about the need for affordable workspace is provided in the Council's Affordable Workspace Strategy. Part A.2. of policy IE4 is clear that the Council will seek 20% of the net additional floorspace to be provided at 50% of the market rent as a working benchmark rather than a fixed requirement. Paragraph 9.65 states: "The Council will negotiate with developers on a case-by-case basis having regard to all relevant circumstances, including scheme viability".
Whilst most arch development in the Borough would not be classified as major, a row of arches might be. Space within arches is often low cost- affordable workspace policy can constrain bringing empty and derelict arches back into use. Further reductions in rent would make lettings unviable. Railway arches should be exempt from requirements and stated in the supporting text.	The policy only applies to major schemes providing at least 1,000sqm GIA of additional floorspace. We understand that it would be unusual for this to apply to railway arch development.
Policy IE4 is welcomed.	Support welcomed.

Main Issues	Councils Response
Consider the 20% benchmark is unrealistic, when the average affordable workspace delivered on schemes in Camden is usually less than 10% of the uplift in floorspace at 80% of the market rent. This policy is therefore overly onerous and imposing such benchmarks will lead to protracted negotiations, delaying delivery. We suggest that viability should be considered when applying policy IE4, to avoid overly onerous requirements which hinder development or those that may result in a reduced affordable housing contribution as a result of affordable workspace requirements.	Part A.2 makes clear that the target is intended to be used as a “working benchmark”, which allows flexibility in the consideration of individual schemes. The policy allows for payments in lieu, which, as set out in Paragraph 9.61, may include the provision of evidence relating to viability. The Council has undertaken a viability assessment of the draft Local Plan which considers the cumulative impact of its policies and demonstrates that the approach in IE4 is viable.
The revisions to the affordable workspace approach at draft policy IE4 are welcomed, particularly the change from gross to net form the previous regulation 18 consultation draft of the Plan. It is welcomed that there is flexibility in the level and depth of discount in recognition that a range of sizes and costs can be beneficial in supporting the inclusive economy, and that a payment in lieu of affordable workspace option is available in appropriate circumstances.	Support welcomed.
The aspirations of the affordable workspace approach at draft policy IE4 are welcomed, and Reef support the revised requirement from gross floorspace to net uplift (when compared with the previous Regulation 18 draft of the Plan). It is welcomed that there is flexibility in the level and depth of discount in recognition that a range of sizes and costs can be beneficial in supporting the inclusive economy. It is also welcomed that a payment in lieu of affordable workspace option is available in appropriate circumstances, provided that these are viable and do not compromise delivery of development.	Support welcomed.
Unite objects to the requirement for 20% affordable workspace. Unite support 10%, but object to 20%, due to: • Economic viability implications of combined contributions requirements. • Implications of enforcing such contributions. • Knock-on effects on rental levels. • Fewer affordable bedspaces. • Sacrificing amenity/ open space. Recommendation: The affordable workspace contribution should be applied at 10%.	The Council has undertaken a viability assessment of the draft Local Plan which considers the cumulative impact of its policies. The Viability Assessment considered that the policy approach in IE4 is viable. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location. Further part A(2) makes clear that the target is intended to be used as a “working benchmark” which should allow flexibility in the consideration of individual schemes. Paragraph 9.61 also states that financial payments may be accepted in lieu of provision, including where evidence is provided relating to viability.
Regal support the removal of the proposed affordable workspace late-stage viability review (which would have been a disproportionate requirement, which may have been particularly prohibitive in bringing forward viable development proposals). However, the ability to consider the appropriate level of affordable workspace to be delivered on site (or through a payment in lieu) through viability testing should be retained within the draft Local Plan, rather than being removed. The removal of this text results in a lack of recognition of the economic challenges that developments can face. Acknowledging viability within affordable workspace policies is advocated in London Plan Policy E3 Part C, and therefore there would be issues of soundness when considering consistency with the London Plan. To ensure that the Local Plan is positively prepared, justified, and consistent with policy, the following amendment is requested: Policy IE4 Part B - Regal seeks the reinstatement of the ability for the provision of affordable workspace (either on-site or through a payment in lieu) to be considered subject to viability.	The policy retains reference to the potential use of viability evidence to establish the quantum of affordable workspace that is to be provided, or alternatively a payment in lieu of provision, as stated at paragraph 9.61.
Affordable and specialist workspace – IE4 • Noting requirements of IE4. • There is concern for requirement of 20% affordable workspace at 50% market rent is wholly unrealistic and that the target should be much less onerous. • Imposing yet further stringent policy requirements will lead to further protracted planning negotiations and delay in delivery.	The Council has undertaken a viability assessment of the draft Local Plan which considers the cumulative impact of its policies. The Viability Assessment considered that the policy approach in IE4 is viable. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location. Further part A(2) makes clear that the target is

Main Issues	Councils Response
The policy should be assessed on a site-by-site basis and factor in viability as well as other policy requirements.	intended to be used as a “working benchmark” which should allow flexibility in the consideration of individual schemes. Paragraph 9.61 also states that financial payments may be accepted in lieu of provision, including where evidence is provided relating to viability.
It is welcome that, following our previous representations, Policy IE4 has been updated to clarify that the affordable workspace provision would be based on net additional floorspace, not gross. As is the cascade approach to this policy, which seeks on site provision first, then off-site and then a payment in lieu.	Support welcomed.
It is considered that 20% affordable workspace at 50% market rent is wholly unrealistic and this target should be much less onerous. Imposing yet further stringent policy requirements will lead to further protracted planning negotiations and delays in delivery.	Part A(2) makes clear that the target is intended to be used as a “working benchmark”, which allows flexibility in the consideration of individual schemes. Paragraph 9.61 also states that financial payments may be accepted in lieu of provision, including where evidence is provided relating to viability. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location. The Council has undertaken a viability assessment of the draft Local Plan which considers the cumulative impact of its policies. The Viability Assessment considered that the policy approach in IE4 is viable.
Instead, the policy should be assessed on a site-by-site basis and factor in viability as well as other policy requirements. Developers often find themselves providing affordable workspace that they cannot let and then having to renegotiate the legal agreement leading to delays and costs. Imposing more stringent policy requirements will only exacerbate this further.	The Council has undertaken a viability assessment of the draft Local Plan which considers the cumulative impact of its policies. The Viability Assessment considered that the policy approach in IE4 is viable. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location. Part A(2) makes clear that the target is intended to be used as a “working benchmark”, which allows flexibility in the consideration of individual schemes. Paragraph 9.61 also states that financial payments may be accepted in lieu of provision, including where evidence is provided relating to viability. The Council's Inclusive Economy team will be able to assist the applicant in finding tenants.
It is generally supported that the council will consider a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. However, any provision must be consistent with the definition of affordable workspace set out in the London Plan.	Support welcomed. Paragraph 9.57 refers to the definition of affordable workspace set out in the London Plan.
The council will also seek payment in lieu of provision where the affordable workspace provided would be less than 300 sqm (except in Hatton Garden), as it can be difficult to find occupiers for very small spaces. Occasionally, a blend of direct provision and payment in lieu may present the most suitable approach. This flexibility is supported.	Support welcomed.
More specific regard should be given to the requirements of the Knowledge Quarter within Camden and the acute shortage of start-up and grow-on space for life sciences. A more flexible approach should be taken to laboratory development which acknowledges the cost and specification required to set up affordable laboratory space, and that the skills required to run such spaces are significantly greater than standard affordable office space.	These matters are already acknowledged. Paragraph 9.64 states "Specialist spaces mentioned above [as described in paragraph 9.56] 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 the headline rent, may be necessary to ensure the 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 factors into consideration when negotiating the quantum and terms of the affordable workspace to be provided".
We request that Part A of Policy IE4 is more explicitly clear that the ‘working benchmark’ is subject to viability.	The Plan is clear that when the Council applies this policy, viability will be taken into account, as set out in paragraph 9.61.

Main Issues	Councils Response
Part B of Policy IE4 does support a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers, but this could be improved to state that various different affordable workspace products might be appropriate in some circumstances.	We consider that this matter is most relevant to specialist forms of space, and therefore the Plan provides more flexibility in terms of their provision, as set out in paragraph 9.64.
The policy text should be re-worded as follows: “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: 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, <u>subject to viability</u> ;	The Plan is already clear that when the Council applies this policy, viability will be taken into account, as set out in paragraph 9.61.
Welcomes affordable workspace in Kentish Town.	Support welcomed

Policy IE5 – Hotels and visitor accommodation

Number of representations: approx. 5

Representations received from:

- Lab Tech
- General Projects Ltd
- Dominus
- London Property Alliance

Main Issues	Councils Response
Support the overarching objective of Policy IE5	Support welcomed.
There is no definition of medium or small-scale hotels. To make most modern hotel developments viable in London, a minimum of 80-90 keys is often required which would usually result in a hotel greater than 2,800sqm when back of house and ancillary facilities are included. Support flexibility of applying the sequential test when additional hotel accommodation is proposed outside of a town centre.	Medium and small hotels are those smaller than the definition of large hotels, which is 2,500sqm or more. We consider the threshold for "larger" hotels to be a reasonable benchmark, for example the recently completed 80 bedroom hotel at 115-119 Camden High Street is 2,343sqm GIA. Support noted regarding the sequential test.
Support policy IE5 as it recognises the importance of hotels and their role in supporting economic growth through London's wider visitor economy.	Support welcomed.
Policy IE5 now limits large hotels (over 2,500 sqm GIA) to the CAZ, with smaller and medium-sized hotels allowed in town centres and mixed-use areas within the CAZ. However, 'small' and 'medium' are not clearly defined. Most modern hotels need at least 80–90 rooms to be financially viable, which usually means they exceed 2,500 sqm. Hotels support local jobs and spending, and should be encouraged, particularly if redundant buildings are being re-used.	Medium and small hotels are those smaller than the definition of large hotels, which is 2,500sqm or more. We consider the threshold for "larger" hotels to be a reasonable benchmark, for example the recently completed 80 bedroom hotel at 115-119 Camden High Street is 2,343sqm GIA.
The draft policy seeks to apply the sequential test where additional hotel accommodation is proposed outside of a town centre. This flexibility is supported.	Support welcomed.

Policy IE6 – Supporting designated centres and essential services

Number of representations: approx. 13

Representations received from:

- Lab Tech
- Primrose Hill Conservation Area Advisory Committee
- Shaftesbury Capital PLC
- British Land
- Kentish Town Neighbourhood Forum
- London Property Alliance
- Highgate Conservation Area Advisory Committee
- Belsize Society

Main Issues	Councils Response
There is no justified evidence base or viability analysis to support the new requirement for major developments of 2,500sqm to include a proportion of smaller units. This should be deleted.	This is an established approach under Policy TC5 of the adopted Local Plan. We have increased the threshold to 2,500sqm (from 1,000sqm) to acknowledging that this may be harder to provide in some medium sized schemes. The policy will be applied flexibly and provision may not be appropriate for every scheme.
Support the flexibility for temporary or meanwhile uses. A change of use from retail to a bar would continue to support the vitality and vibrancy of an established centre.	Support for approach to meanwhile uses welcomed.
Object to the requirement for applicants to demonstrate that a centre is 'in decline and struggling' to justify the loss of Class E uses.	We consider the approach to loss of Class E uses to be reasonable. The priority given to Class E uses acknowledges that these are likely to be acceptable in principle within core/primary shopping areas whereas the over-concentration and/or siting of certain non-Class E uses may give rise to concerns about the impact on the centre.
Support Part A(8).	Support for Part A(8) noted.
Remove A(9) relating to the amalgamation of units - this is sometimes needed to make units viable, e.g. fire safety regs, disabled access and M&E requirements can reduce available space	We intend to apply A(9) flexibly - it is particularly targeted towards the retention of smaller units within Specialist Areas. The intention is not to inhibit necessary works to address the matters raised - we will propose a minor modification to the supporting text for clarity.
Welcome the inclusion of retail clusters at 1-31 Princess Road, and at 138-148 Gloucester Avenue as neighbourhood centres. Continue to press for the designation of 42 and 65-77 Gloucester Avenue, with their destination fish-shop and specialist bakery, as a neighbourhood centre.	Support welcomed.
Suggest the wording of Policy IE6 A11 is amended to replace "essential" with "valued role".	We consider that the definition of "essential" services at paragraph 9.109 will ensure that the policy focusses on those premises are genuinely significant local importance.
Paragraphs 9.102 - 9.104 are welcomed.	Support welcomed.
Paragraph 9.102 Not applicable in the area.	Comment noted.
Retail floorspace is often provided as part of commercial and residential development to provide active ground floor frontages and amenity to the residents and occupiers of the building. Requiring smaller units and discounted rents is likely to impact the overall viability of the development and reduce the amount of affordable housing and/or other public benefits that can be provided and is not justified by the evidence base. This is contrary to the Development Plan's strategic objectives, and should be removed.	This is an established approach under Policy TC5 of the adopted Local Plan. We have increased the threshold to 2,500sqm (from 1,000sqm) acknowledging that this may be harder to provide in some medium sized schemes. The policy will be applied flexibly and may not be appropriate for every scheme.
Draft Policy IE6 includes a new requirement for major developments providing 2,500 sqm or more of retail floorspace to include a proportion of smaller units, including floorspace available at a discount to market rents. There is no justifiable evidence base or viability analysis to support this requirement and a lack of any detailed guidance and therefore it should be removed.	This is an established approach under Policy TC5 of the adopted Local Plan. We have increased the threshold to 2,500sqm (from 1,000sqm) acknowledging that this may be harder to provide in some medium sized schemes. The policy will be applied flexibly and may not be appropriate for every scheme.
Shop windows should be kept clear of excessive advertisements and particularly film which may cover a large percentage of the shop front window. No oversized shop signage should be allowed on the high street and in particular in back and side streets and industrial estates.	Where films are applied to the inside of windows, advertisement consent is often not required. Policy D7(A) states that 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".
Fully support each part of this policy, particularly in relation to the 4 Neighbourhood Centres identified in this area. We have concerns about some retail units becoming other uses and hope the Council might find a way to retain a balance of businesses. We wish the council to resist applications for metal security shutters and grills which create a hostile visual environment. We also wish to see policies protecting small units from being merged to form larger ones. We are surprised and disappointed the highly significant new 100 Avenue Road development at Swiss Cottage (W12), on the border of area C/W, has not been given any detailed consideration in this plan. This hugely damaging scheme will destroy an important and heavily used pedestrian piazza and we feel consideration of this is a major omission. The fact that this 'place' has not been recognised more emphatically in this Local Plan is a deficit.	Support welcomed. Criterion B5 of Policy D8 Shopfronts states that solid shutters will only be considered to be acceptable in exceptional circumstances. Criterion A.9 of Policy IE6 - Supporting Designated Centres and Essential Services - resists proposals involving the formation of larger units where this would harm the character or role of a centre. Site allocation W12 -100 Avenue Road reflects the fact that the site has planning permission and works have commenced. Any subsequent application will be assessed against the allocation and all relevant Plan policies, including those on design (D1) and open space (SC4).

Policy IE7 – Hot food takeaways

Number of representations: approx. 2

Representations received from:

- Lab Tech
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
Hot food takeaways are integral to the character of Camden's markets. Amend policy to read: resist new hot food takeaways elsewhere in the borough (save for Camden Markets), where these would increase the total number of hot food takeaways within a designated centre, above the current Camden Retail Survey baseline; and... It is not reasonable to require an HIA for a new hot stall within the market as it would turn prospective tenants away and add additional time and cost to the process. Amend policy to read: require applicants for new hot food takeaways within high streets or near schools 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.	The policy is referring to situations where hot food takeaways constitute the principal planning unit, rather than situations where food stalls form an element of a larger market. It is not considered necessary or appropriate to add a specific exclusion for Camden markets. It is considered reasonable and appropriate to expect all hot food takeaways to undertake a HIA regardless of their location. The approach is consistent with London Plan Policy E9 Retail, markets and hot food takeaways.
Policy IE7 outlines future proposals, and not anything about the kitchens which already exist. KTNF appreciates the development of the policy but within that it wants the Council to set limits on the number of vehicle movements and hours of operation and the use of electric vehicles exclusively during Framework hours (in the late hours on weekdays and on Weekends from Saturday 1pm). A monitoring team needs to be established to ensure that hours of operation and vehicle numbers are not exceeded.	Vehicle movements are addressed by Local Plan Policy T6 - Sustainable Movement of Goods, Services, and Materials. Monitoring forms a part of workplace Travel Plans and is funded through a planning obligation.

Policy IE8 – Gambling uses

Number of representations: approx. 1

Representations received from:

- Lab Tech

Main Issues	Councils Response
The policy should reflect the need to support a range of uses within the night time economy - a blanket ban on gambling uses would fail to protect night time venues and spaces. Many family entertainment uses within Camden Markets to have elements of gambling in the form of competitive entertainment. Amend draft policy to refer to 'betting shops'.	The policy addresses premises where gambling uses are the principal planning unit, and not family entertainment activities which form an element of a market. The Plan acknowledges that the Council will assess proposals on a case-by-case basis taking into account the relative risk: "We are taking a data-driven approach, resisting further openings of these uses based on where the relative risks of problem gambling are highest" (para. 9.125). It is not considered appropriate to refer to betting shops this would exclude other gambling uses.

Policy IE9 – Delivery-led food businesses

Number of representations: approx. 1

Representations received from:

- The Arch Co

Main Issues	Councils Response
A distinction should be made between dark kitchens and production kitchens which do not generate the same levels of vehicle movements nor amenity issues.	Policy IE9 applies to delivery-led food businesses. If a food production business is not delivery-led it would not need to be assessed against this policy. Any development involving a food production business that is delivery-led would properly be assessed against the policy to allow consideration of its impact.

Policy IE10 – Markets

Number of representations: approx. 1

Representations received from:

- Lab Tech

Main Issues	Councils Response
The markets are important not only for Camden and London but are also a worldwide attraction. It is not for planning policy to stipulate a variety of rents when there is a difference in market rents compared to traditional retail spaces. This should be replaced with: 'Seek the provision of stalls and spaces, at a variety of rents, including larger units to support grow on space with consideration given to how start-up businesses can be supported'.	We consider the approach to be reasonable and appropriate to meet the objective, set out in para. 9.140, to ensure that markets remain genuinely accessible for traders with different levels of experience and resource.

Chapter 10 – Supporting Camden's Communities

Number of representations: approx. 1

Representations received from:

- Highgate Society

Main Issues	Councils Response
It is essential that Camden commits to working with the other local authorities to ensure that the loss of a community facility, pub, open space, etc., in any part of the Highgate area will not work to the disadvantage of the Camden or other parts of Highgate through its impact?	Comment noted. Paragraph 15.36 of the Local Plan acknowledges that the delivery of strategies and Local Plan policies is contingent on working with partners, including neighbouring boroughs.

Policy SC1 - Improving health and wellbeing

Number of representations:

Representations received from:

- Hilson Moran
- NHS HUDU
- Kentish Town Neighbourhood Forum
- Highgate Conservation Area Advisory Committee

Main Issues	Councils Response
Welcome changes made to the supporting text of Policy SC1 to respond to the comments made by HUDU on the draft Local Plan (Regulation 18 stage).	Support welcomed.
We support: Policy SC1 and in particular • Promoting healthy lifestyles, increased physical activity and improved mental health through the design of new development (Policies DS1, SC1 and D1), the protection of existing and provision of new and enhanced open space, play and sports facilities (Policies SC2 and SC3) and investment in active travel (Policies T1 and T2).	Support welcomed.
Major needs to be defined and definition of major is subject to change.	Para 10.12 sets out what we would define as a major application for the purpose of this policy.
We can see no mention at all of the WELL building standard in the policy - All they seem to require in terms of health & wellbeing is a 'Health impact assessment'. We agree that WELL assessments don't typically form part of planning requirements so I would not expect to see WELL assessments required as planning policy, and that Health Impact Assessments (HIA) needs to be undertaken for all major applications at early stage in the design process.	Comment noted. Planning policy cannot require developments to meet the WELL building standard.

Policy SC2 – Access for all

Number of representations: approx. 3

Representations received from:

- Hilson Moran
- UCL
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
Policy SC2 3 and 7 is welcomed.	Support welcomed.
It is noted that neurodiversity is addressed across several chapters in the proposed Local Plan.	Comments noted.
Additional comments in relation to the supporting draft Equality Impact Assessment: a. Request to see more explicit reference to ambulant accessible, wheelchair accessible and changing place facilities when discussing free publicly accessible toilets. reference to free publicly accessible toilets. b. Clearer reference should be given to disabled students, not just based on age. c. Under Step 5-1, the approach to no-car policy has not considered the use of EV cars which would negate some of the comments. A commitment to EV vehicles would be welcome pertaining to charging stations and the provision of accessible charging facilities.	Policy SC2 Access for all sets out the Councils approach to ensuring that developments are designed to promote access and inclusion and that the barriers which prevent everyone from accessing facilities and opportunities are removed. No change is therefore considered necessary.

Policy SC3 - Social and community infrastructure

Number of representations: approx. 13

Representations received from:

- Metropolitan Police Service
- Department for Education
- UCLH NHS Foundation Trust
- NHS Property Service
- Royal Free Hospital
- Land Sec
- Sport England
- NHS HUDU
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
Policy SC3 should be updated to align with London Plan Policy S1 which states the loss of social infrastructure is acceptable if it supports a broader public service transformation plan requiring modern facilities to meet future needs.	Policy SC3 sets out our approach to the loss of social and community infrastructure. We consider there is sufficient flexibility in the policy to respond to the issue raised. The London Plan forms part of Camden's Development Plan and relevant London Plan policies are taken into account as necessary when planning applications in Camden are assessed.
Supports this policy- "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" and that provision of new or improved infrastructure will be supported where it meets various criteria including "where proposals... meet the needs of the intended users and promote community integration and inclusion".	Support welcomed.
Support provision of sufficient, quality community facilities. NHS requires flexibility in use of its estate. Selling redundant properties is critical in helping to fund new or improved services. Where it can be demonstrated that health facilities are surplus to requirements or changed as a result of service transformation programmes, it should be accepted that the facility is no longer required. Add the following text to the policy or supporting text: <u>Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will satisfy Policy SC2 Part D(i)(a) and there will be no requirement to retain any part of the site in an alternative community use or require evidence of marketing.</u>	This situation is already envisaged at paragraph 10.57: "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".
Support general objectives of the Council to work with partners to ensure that social and community infrastructure is developed and modernised. D1(a) appears overly prescriptive in seeking an equivalent quantity to that existing. In planning estate developments, there will be occasions when the quantity of replacement facilities would not	This is already addressed at paragraph 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

Main Issues	Councils Response
equate to existing or deliver the most suitable option, e.g. improved efficiencies, technological change, changing ways if working, population needs. It is noted that para 10.56 of the supporting text to policy SC3 does suggest a degree of flexibility but it is considered that any flexibility should be defined more clearly within the policy itself. The IDP points to the need for flexibility to ensure UCLH can respond to changing requirements for services and working practices. Freeing up some existing sites used for healthcare could enable optimisation of sites for alternative uses and opportunities for redevelopment of more efficient facilities with reduced floorspace elsewhere. Suggest text is amended as follows: a replacement facility is provided. Any facility must be of at least equivalent quality, quantity (other than where a reduced quantity can still demonstrate successful operation of that facility), and accessibility to that of the existing facility, and must meet the needs of the local population, or its current, or intended users.	facility is unable to address a need for any other community use in the local area...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".
MPS receive government grant funding but this is not enough to fund policing resourcing so developer contributions are sought. Additional homes and employment significantly increase the need for policing. MPS seek developer contributions from residential developments that are referable to the Mayor of London. Requirements to contribute through S106 towards policing infrastructure have been tested through numerous appeals and court cases and found to be compliant with the CIL regulations. Police forces throughout the country secure section 106 funds in this way and there are also examples of such contributions being made within London Requirements to contribute through section 106 towards policing infrastructure have been tested through numerous appeals and court cases and found to be compliant with the CIL Regulations. MPS receive government grant funding but this is not enough to fund policing resourcing so developer contributions are sought. Additional homes and employment significantly increase the need for policing. MPS seek developer contributions from residential developments that are referable to the Mayor of London. Detailed wording for the Infrastructure Delivery Plan is provided.	We propose to amend the funding section of the IDP to acknowledge the use of contributions for schemes referable to the Mayor of London. Under Policy CC2 of the Local Plan, the Council expects developers to prioritise the retention and improvement of existing buildings over demolition and subject to a condition and feasibility statement and development options appraisal. In the event that the Section House is to be retained, the site allocation merely notes that the Council's preferred use of the building is as student housing. The policy text at (7) refers to "seek"-ing a new walking, wheeling and cycling route. Improvements to pedestrian / cycle connectivity southwards is key objective of the adopted Supplementary Planning Guidance for the Regis Road area for this site as part of wider parcels of development. Therefore, the requirement to seek a new walking, wheeling and cycling route is justified.
Policy SC3 D 1. b is contrary to paragraph 104 of the NPPF. Marketing is not an assessment of need and demand so providing evidence of marketing and vacancy evidence for a twelve- month period does not meet the requirements of the NPPF. Consider that Policy SC3 is not consistent with SC4, which reflects the requirements of NPPF paragraph 104.	We consider that part D of the policy appropriately reflects paragraph 104 of the NPPF. We consider that the approach in Policy SC3 is appropriate and reasonable insofar as it deals with indoor sports facilities which in many cases will be community buildings accommodating a range of different activities. Policy SC3 is not intended to deal with outdoor sports and recreation facilities which are addressed by Policy SC4 - Open Space. We will propose additional wording for clarity on this.
Policy SC3 1 and 2 are strongly supported.	Support welcomed.
Paragraph 10.45 is strongly supported.	Support welcomed
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." KTNF fully supports this approach.	Support welcomed
Welcomes the principles of the policy SC3. The difficulties associated with funding social and community infrastructure should be taken into consideration when determining whether the provision of social and community facilities is appropriate.	Para 10.55 recognises that 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

Main Issues	Councils Response
	ongoing revenue costs of a facility itself, we will expect the applicant to demonstrate how the future of the facility will be secured. No change is considered necessary.
Broadly support the principle of preparing a 'social and community infrastructure' focussed policy (Draft Policy SC3), geared to the Council 'working with its partners' to ensure that important local and community facilities and services are developed and modernised to meet the changing needs of the Borough.	Support welcomed.
Broadly support the policy; however, it fails to recognise that the loss of facilities may be acceptable in an event where proposals form part of a wider estate rationalisation / improvement strategy. As such, it fails to accord with the requirements and aspirations of London Plan Policy S1. The policy should be re-worded to allow for a loss of social/community infrastructure floorspace (including healthcare-related facilities) where it can be demonstrated that this forms part of an estate rationalisation programme which will deliver facilities to meet future population needs or to sustain and improve services.	This situation is already envisaged at paragraph 10.57: "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".
There is no recognition of the need for a permanent site for Abacus Belsize Primary School, within the IDP or as site allocations on the proposals map. There should be explicit reference in the IDP to the need for a permanent home for Abacus Primary School, and site options identified on the Local Plan proposals map or listed elsewhere in the Local Plan and/or supporting documents.	There is no requirement for local plans to allocate sites for specific schools. There is currently a surplus of school places in the Borough, which had resulted in school mergers and closures in recent years. Policy S14 Pakenham Street and Wren Street identifies education as a suitable use.

Policy SC4 – Open space

Number of representations: approx. 15

Representations received from:

- Network Rail
- Redington Froggnal Neighbourhood Forum
- Woodland Trust
- CPRE
- Primrose Hill Conservation Area Advisory Committee
- Sport England
- Kings Cross Central Limited Partnership
- St George West London
- British Museum
- Kentish Town Neighbourhood Forum
- Sommers Town Neighbourhood Forum
- Joseph Homes
- Belsize Society

Main Issues	Councils Response
Concerned that the Policies Map may not have included all the outdoor sports and recreation facilities in the Borough. The Plan is silent on non allocated facilities potentially resulting in a lack of protection contrary to NPPF para. 104. A standards approach has limitations in sports facilities planning as it may not reflect the need for a specific area and it may not be clear whether the local sporting need arising from a development is being met. Need can be established through use of Sport England's sports facilities calculator or its Playing Pitch calculator.	We consider that the designation of open spaces on the Policies Map and part (2) of the policy provides comprehensive protection of sports facilities in the borough. As part of the Local Plan review, we proposed a number of new open space designations (reflecting where new open spaces have been delivered) and have engaged with relevant Council services, such as sports colleagues, to ensure that the Local Plan policy is up-to-date The 9sqm standard relates to the provision of open space and has been a long-standing and effective means of securing new open space in the borough. Because of the limited availability of land in the borough, and demand for other land uses such as housing, we do not consider except for the Euston area and site allocations involving certain large sites, that there are significant opportunities for delivering new open spaces and sports facilities. Given that almost all sites in the borough come forward on brownfield land, within an already highly built-up area, we would question the value of using the Sports Facilities and Playing Pitch Calculators as they are likely to identify a need which it is not possible to meet.
Existing open space is becoming over-used. Suggest Policy SC4 is amended to include: B d. loss of vegetation and development of sites of interest for nature	Policy NE 2 on Biodiversity seek to ensure that development protects and enhances nature conservation and biodiversity in the borough. Part D of policy SC4 sets

Main Issues	Councils Response
conservation, and sites with the potential to become of interest for nature conservation, will not normally be permitted.	out the Council's approach to the design and management of open space. No additional wording is therefore considered necessary.
Policy SC4 - urge the importance of supporting the protection of green open space throughout the Borough, for environmental and ecological value and supporting a local sense of place and belonging shared by a range of age-groups.	Policy SC4 sets out the Council's approach to protecting existing open space and securing new and improved open space for all.
Policy SC4 B5 and paragraphs 10.72 - 10.74 are strongly endorsed.	Support welcomed.
The Open Space Sports and Recreation Study 2014 is out of date, particularly in the Euston and Kings Cross areas that have seen so much change. The study is now 11 years old and requires updating.	Based on the Borough's circumstances, we do not consider that preparing revised open space and sports evidence is needed or proportionate. Since the last Local Plan was adopted in 2017, there have only been limited changes in the supply of open space and sports facilities in the borough. Except for the Euston area and site allocations involving certain large sites, there is limited land available for delivering new open spaces and sports facilities regardless of the level of demand.
Paragraph 10.79 KTNF wholly supports this approach. It enhances the health of those living in the vicinity, and is positive in terms of biodiversity, water retention and cooling in the summer.	Support welcomed
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." Community groups need stronger support over this, given previous rejections of this approach.	Comment noted.
The policy as it is currently written does not account for privately-owned designated open spaces such as the BM south forecourt, which sits inside the boundary of the BM's site and which the BM operates as an open space for BM visitors to the extent that it is able to when considering the security threat and operational requirements of the site. For private open spaces such as this, it is reasonable to expect that the owner and Council will work together to ensure protection of the open space in a way that safeguards and does not unduly restrict the use of the wider site for its main purpose. The ambitions of Policy SC4 Open Space need to be balanced with the aims of Policy A2 Safety and Security. BM requests that wording to acknowledge additional flexibility in the operation of public open space in private ownership is added to either the policy or supporting text.	Part B of Policy SC4 also applies to private open spaces. Further guidance on this is set out in the supporting text to the policy and the Council's supplementary planning guidance on open space.
We welcome the preference in point De) for native and priority species in new or enhanced public space. This is important for biosecurity and biodiversity.	Support welcomed
Draft Policy SC4 (part C, 1.a-c) should be expanded to include other forms of development, such as LSPBSL. The policy should clarify how the standards for public open space relate to the standards for child play space set out within the London Plan, and, where it's not practicable to provide all the required open space and play space on site, which should take precedence.	Table 11 in the Local Plan sets out open space standards for different types of development in Camden. The open space standards for residential (all types) would apply to LSPBSL schemes. The provision of open space and play space in a particular scheme will be considered at the planning application stage, taking account of all relevant policies.
There are space constraints at Euston which means there is a limited ability to unlock open space without compromising operational area. RECS will work with Camden and Partner's to understand what is feasible by finding the balance between operational requirements and offering open space to meet policy expectations.	Comment noted.
The requirement for 9 sqm of public open space per residential occupier should be replaced by a flexible context-led approach.	The 9sqm standard relates to the provision of open space and has been a long-standing and effective means of securing new open space in the borough. It is considered that the policy is worded sufficiently flexibly to allow for off-site provision or a payment in-lieu to be provided where it can be justified that on-site provision is not achievable. No change to wording is therefore considered necessary.
Paragraph 10.81 should also include a cross reference to the Camden Planning Guidance on open space which acknowledges that the 9sqm per occupier residential figure	We will propose a modification to address this.

Main Issues	Councils Response
includes an allowance for play provision. Add text to the end of para 10.81 - Further guidance on how the level play provision is considered is provided in the Camden Planning Guidance on open space.	
The Plan should introduce a policy to create streetparks in areas of open space deficiency.	Policy T1 Safe healthy and sustainable transport states that the Council will seek contributions from development towards the delivery of appropriate highways greening measures. Paragraph 14.5 explains that this could include the introduction of pocket parks. T1 supports the delivery of the Council's Transport Strategy. This supports general improvements to the public realm, which includes the delivery of 'parklets' which transfer pockets of kerbside space from parking to greenery, seating, climate resilience measures etc..
We are concerned about SC4 (B1), (B2) and (B4) as it is all too easy to apparently 'justify' changes to open spaces and once lost or degraded will be in perpetuity. We welcome the plan protecting existing open spaces and ensuring that new development contributes through new provision, improvements, and green infrastructure. The focus on play & wellbeing is good The plan is very much focused on areas that are to be developed, without specifics for areas where no new housing is envisaged. The plan should include easier routes to secure and then deliver investments in open spaces outside of new housing developments.	The Local Plan sets out the approach the Council will take when it assesses applications for planning permission. Other Council strategies will set out the wider approach to specific matters, e.g. the forthcoming Green Infrastructure Strategy.

Policy SC5 – Food growing

Number of representations: approx. 2

Representations received from:

- Primrose Hill Conservation Area Advisory Committee
- London Property Alliance

Main Issues	Councils Response
Policy SC5 is welcomed.	Support welcomed.
Policy SC5 (Part 2) seeks to secure the provision of suitable space for on site food growing. Whilst the principle of this is supported, it is not a planning requirement and therefore should be removed. If it is to remain, it should form a part of the open space requirement of Policy SC3.	The supporting text to Policy SC5 states that space for food growing will be sought as part of the overall open space requirement generated by a development, in accordance with Policy SC4 (Open Space).

Policy SC6 – Cultural facilities

Number of representations: approx. 3

Representations received from:

- Theatres Trust
- British Museum
- Primrose Hill Conservation Area Advisory Committee

Main Issues	Councils Response
Policy SC6 is supported and welcome the inclusion of libraries.	Support welcomed.
We welcome that following our comments at the previous stage of consultation this policy has now been amended to provide protection to cultural facilities.	Support welcomed.
The BM notes the change in the wording of the part of the policy that deals with proposals for new or re-located cultural facilities, or additional floorspace (part D) which previously 'may have required the provision of information relating to potential impacts on the continuing operation of existing cultural facilities nearby, the contribution to the delivery of local arts and cultural strategies, and details of shared use/daytime use of the facility by other cultural or community organisations, including on a temporary/'meanwhile' basis, and now 'will' require this. The BM considers that it is unreasonable and unfeasible to require this of every increase in floorspace it proposes, especially given the upcoming WR Project which may	Comments noted. Modification proposed.

Main Issues	Councils Response
increase floorspace within the BM site and which would be entirely appropriate for a National Institution of this nature.	

Policy SC7 – Public houses

Number of representations: approx. 1

Representations received from:

- Primrose Hill Conservation Area Advisory Committee

Main Issues	Councils Response
Policy SC7 is welcomed.	Support welcomed.

Chapter 11 – The natural environment

Number of representations: approx. 4

Representations received from:

- Highgate Conservation Area Advisory Committee

Main Issues	Councils Response
There are many positive aspects of the draft Camden Local Plan on the Natural Environment, the adverse effects on climate change, demolition of existing large buildings with the embodied carbon and loss of trees and open space needs to be very carefully balanced in policy and then monitored and recorded.	The carbon reduction being delivered by major developments (against part L of the Building Regulations) is recorded as part of Camden's Authority Monitoring Report. Policy CC2 of the draft Local Plan sets out the evidence that applicants should prepare when considering proposals involving substantial demolition in order to demonstrate that the retention and retrofit of buildings has been thoroughly explored – this is then published as part of individual planning applications. The Council monitors tree canopy cover in the borough and publishes Camden Tree Statistics (available through Camden Open Data). Changes in open space are monitored through the Authority Monitoring Report.
Rebalancing provision of open space should be a priority for this Plan. A growing population and protecting nature must together be taken forward by Camden without conflict between the two essential ingredients of a Local Plan.	As set out in paragraph 2.3, the draft Local Plan aims to maximise opportunities for providing new and affordable homes, jobs and the infrastructure required to support this, whilst ensuring that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents.
Communities can help shape better designs and environmentally friendly schemes which respect the nature, character, communities and heritage of Camden. Fostering nature in an ever higher density developments must not be a contradiction.	Comment noted.
If Chapter 11 is to become meaningful in practice then Camden needs to talk to government about the destructive effects of its weakening protections for biodiversity and habitats, and its weakening of goals and efforts to counter climate change and carbon emissions.	The Council (including the planning service) regularly respond to Government consultations on changes to policy and legislation. This provides an opportunity to set out how emerging proposals would impact on Camden, or could be improved, and raise matters of particular concern for our residents.

Policy NE1 – The natural environment

Number of representations: approx. 31

Representations received from:

- GLA
- Redington Frognal Neighbourhood Forum
- Woodland Trust
- Residents
- CPRE
- Primrose Hill Conservation Area Advisory Committee
- Hilson Moran
- Highgate Neighbourhood Forum
- Kentish Town Neighbourhood Forum
- Highgate Society
- Highgate Conservation Area Advisory Committee
- Environment Agency

- Eton Conservation Area Advisory Committee
- Belsize Society

Main Issues	Councils Response
The draft Plan includes insufficient practical measures to meet the NPPF requirement that existing trees are retained wherever possible. Measures are needed to protect the vast majority of trees not eligible for TPO status. Of exceptional importance are the green corridors in the back gardens of residential streets and a method of protecting these needs to be adopted urgently. Plan does not incorporate sufficient measures to preserve gardens. Encouraging to see the draft Plan acknowledge the many benefits of trees. Pleasing to see ambitions when TPO trees are felled and incorporation of green infrastructure into major development. Need to ensure there is replacement planting of equivalent value. Outside of CAs, there is no requirement for the Council to be notified of works to trees, including felling. Need to protect trees in CAs that do not satisfy criteria of being TPOs recognising their value in protecting against pollution and for biodiversity. If the Council do not give sufficient protection to green corridors/ trees in green corridors, they won't exist in 5 years time. Define "disproportionate" loss of green space Target for tree canopy increase seems unambitious Expectation that 2 new trees will be planted for every tree lost is unlikely to result in a significant increase in canopy cover More enforcement of planning commitments for trees.	We consider that the Plan's approach to protecting trees is appropriate, taking into account the powers local authorities have in relation to trees, and is consistent with national policy.
Suggest the wording of paragraph 11.13 is amended to read "One neighbourhood plan in Camden has identified gardens as constituting a local ecological network and another has proposed wildlife corridors that cross gardens, which those plans seek to protect and enhance".	The existing wording is intended to acknowledge that certain wildlife corridors have been identified in neighbourhood plans in the borough which can in turn form part of an ecological network. It is not necessary to provide further detail in the boroughwide local Plan about individual corridors or neighbourhood plans.
Suggest the wording of paragraph 11.14 is amended to read "Part of the established character of garden spaces may also be defined through features such as boundary hedges railings and garden walls."	We agree that hedges can form part of the established character of a garden and will include this as one of the examples given.
Suggest the wording of Policy NE1 A 5 is amended to read "protect non-designated spaces with nature conservation, townscape and amenity value, including private gardens which, cumulatively, may constitute a local ecological network, where possible;"	The role of gardens is already acknowledged by this criterion and in paragraphs 11.11 – 11.14 of the supporting text.
Suggest the wording of Policy NE1 A 8 is amended to read "expect development to protect and enhance biodiversity in line with Policy NE2 (Biodiversity) and neighbourhood plan policies."	It is not necessary to provide additional reference to neighbourhood plans, which forms part of the development plan and therefore must be taken into account alongside the Council's other plans when making decisions on planning applications in that area, as noted in paragraph 1.15 of the draft Plan.
Policy NE1, NE1 A5 and paragraphs 11.11 - 11.16 are welcomed.	Support welcomed.
The "Protections, Encouragement, Enhancement and Contributions etc." are all very necessary but they don't seem to be backed up with some smart objectives e.g. there are no measurable specifications, no time-bound, no potential cost of resources addressed and what infrastructure would be in place to support the Policy and it doesn't feel those contents in the policy are quite achievable in reality.	These matters are addressed as part of habitat assessments and species surveys. The introduction of Biodiversity Net Gain legislation and Urban Greening Factors (through the London Plan) also provide a mechanism for evaluating enhancement and comparing what is being delivered across different sites/schemes.
A4. " Supporting communities seeking the designation of Local Green Space through the neighbourhood planning process". In 2024, KTNF suggests that public information on the preferable choices of plants, bushes and trees in gardens/terraces to achieve maximum impact in the creation of these green pathways could be integrated in some way into the plan.	Detail on choice of plants is not an appropriate matter for the Local Plan.

Main Issues	Councils Response
Paragraph 11.10 KTNF is in the review process of our current plan. We'd seek a multicultural approach to our communities in order to increase the awareness of importance to protect the local green spaces and encourage green initiatives in local redevelopment projects such as Regis Road.	Comment noted
To support your policy outlined in 11.12 - 11.16 we would like to see that the Council sets out guidelines/rules in the planning application forms to clarify what percentage of original gardens should be maintained as green spaces, especially properties situated in conservation areas, and how the trees in gardens should be maintained or replaced. In addition, it is suggested a green space map may be added to the Local Plan to support 11.16.	We consider that this matter is already adequately addressed at paragraph 11.12. Certain developments within gardens do not require planning permission due to the operation of permitted development rights, which are separate to the Local Plan. Policy and guidance relating to trees is set out in Policy NE2 and adopted Camden Planning Guidance on Trees. Designated open spaces within the borough – including Local Green Spaces identified in neighbourhood plans – and shown on the Local Plan Policies Map.
It is important to raise the level of education about nature.	Comment noted
It is suggested that there should be a summary of planting strategy for trees/green plants and this should be outlined in the Council's Camden Planning Guidance and it should provide some educational ideas such as what type of trees are suitable or unsuitable for residential gardens and small households. The planning application form should be designed in a way to reflect the Council's Planning Guidance.	This is a matter for the review of Camden Planning Guidance. The content of the planning application form is set a national level.
11.31 & 11.32 What would be the "net gain projects"? and in what way would the Neighbourhood Plans map be improved in terms of biodiverse planting and landscaping?	The action plan for the Council's adopted biodiversity strategy identifies key projects. The Council's Nature Conservation Officer is the most appropriate person to consult regarding the identification of local networks (which could form part of a neighbourhood plan).
While light pollution is mentioned, there does not appear to be any specific policy to counter it. We are aware of the detrimental effects on nightlife, including problems for bats and the obscuring of the night sky.	Light pollution is addressed by Policy A1 on Protecting Amenity B (3) and paragraphs 13.8 - 13.10. Para 13.8 makes clear that potential impacts on wildlife should be considered. We will propose a modification to add a cross reference to policy A1.
Camden should include TfL as one of the partners to work with, and the overground rail network should be included in the ecological network. Although it is mentioned in the SINC appendix, it is not specified in the main plan.	Parts of the Overground network in Camden which are of nature conservation importance are already protected as SINCs by the Plan and Policies Map.
The view of St Paul's from Waterlow Park should be protected as should the view over London from Hillway.	The Local Plan reflects the strategic views of St Paul's and London identified in the London View Management Framework prepared by the Mayor of London / GLA to support the London Plan. As the view from Waterlow Park towards London / St Paul's would impact a number of boroughs, its designation is most properly considered as a strategic view by the GLA. The Local Plan will reflect any new view designation made by the GLA.
11.25 There should be a green corridor from Hampstead Heath across to Highgate Cemetery and Waterlow Park.	Much of the residential area between Hampstead Heath and Highgate Cemetery is already designated as open space and will be protected in line with Policy SC3. We consider that the identification of corridors is best addressed through the emerging Camden nature recovery network or in a neighbourhood plan. We will pass this comment to the relevant officer.
An area like the Holly Lodge Estate, with its large gardens and a green spaces, should have its own ecological designation as should areas like the former Highgate Common. Pond Square, The Reservoir, the copse attached to 46 Highgate West Hill and the open spaces attached to the houses in The Grove and South Grove, are all that is left of the common, enclosed 200 years ago. To have an ecological designation would help enhance what remains.	The most significant areas of Holly Lodge Estate already benefit from protection – Holly Lodge Gardens is designated as a Site of Importance for Nature Conservation and as an open space, while the gardens to the north of Makepeace Avenue are designated as a Local Green Space. Pond Square is designated as an open space and a Local Green Space. Highgate Reservoir, parts of the gardens at 1-9 The Grove, South Grove Square and Burlington Court Triangle are all designated as open spaces. Any additional designations in the area could be considered as part of the neighbourhood planning process.
Same as before - previous comments were not addressed "strong protection to maintain the openness and character of Metropolitan Open Land (MOL)" is very vague, specially when stating that there will be the protection of several habitat types in this section."	Areas of Metropolitan Open Land are identified at a London wide level and there is already a detailed policy in the London Plan on MOL (Policy G3) which sets out how it is to be protected. We do not consider that further detail in the Local Plan is necessary.
Policy NE1: The Natural Environment We have no further comments to add to this policy.	Comment noted.

Main Issues	Councils Response
We would welcome a commitment to upgrading large gardens around Hampstead Heath to Metropolitan Open Land. MOL 11.6 should therefore commit not only to “protecting the openness and character” of Metropolitan Open Land, but to expanding its area where possible.	We consider that the MOL designation on the Local Plan Policies Map are appropriate. London Plan policy G3 on Metropolitan Open Land states that MOL extensions to MOL should being clearly distinguishable from the built-up area, which would not be the case with the gardens of residential properties.
5. In view of the major ecological value and potential of the large gardens adjoining Hampstead Heath – some of them extremely large - we would wish to see a commitment to working with the owners of these gardens to encourage them to commit to managing them for wildlife as part of the ecological corridor. it is our experience that a major threat to these spaces is the proliferation of home offices (particularly since Covid) and other large outbuildings in back gardens, are permitted development. We would welcome the inclusion of a commitment to place Article 4 Directions on back gardens, to remove permitted development rights which could cumulatively result in long-term degradation of the ecological corridor.	Working with homeowners to improve the biodiversity value of gardens is not a matter for the Local Plan. Rather, this matter is most likely to be addressed as part the ‘action plan’ for the Council’s adopted Biodiversity Strategy. We will pass the comment onto the relevant officer to consider. The introduction of Article 4 Directions is not a matter for the Local Plan.
We welcome the addition from the Reg 18 consultation of a specific reference to ancient and veteran trees in NE1 A3.	Support welcomed
There are four areas of MOL within Camden. The supporting text for Policy NE1 states that LBC 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’. The GLA do not consider the changes to the NPPF in December 2024 apply to MOL and will be seeking to address this through the new London Plan.	Comment noted.
Support the Council’s commitment to protect the openness and character of Metropolitan Open Land and other designated open spaces. Support the Council’s commitment to protect gardens and other undeveloped areas, as these can have a significant impact upon the amenity and character of the local area and may increase local flood and heat risk.	Support welcomed.
The Plan should require planning permission for conversion of front gardens for parking (i.e. remove Permitted Development Rights) and set out clear limitations on when planning permission for conversion of front gardens for parking (‘driveways’) will be permitted.	The introduction of Article 4 directions is not a matter for the Local Plan.
Suggest that paragraph 11.4 is amended to outline how Green Infrastructure would support the well-being of increasing local population.	No additional wording is considered necessary.
11.3 & 4. It should be made clearer that the individual garden spaces in the Borough, large and small, together form a vital ecological corridor through and beyond the Borough, contributing to the viability not only of ecology in Camden, but of a wider area of London.	Criterion 7 in Part A of Policy NE2 Biodiversity recognises the biodiversity value offered by gardens and soft landscaping in contributing to wildlife corridors.
We wish to see a less equivocal statement of the importance of private gardens in paragraph 11.12. In the second sentence the third and fourth words “can be” should be replaced with “are”, so that it reads: “Therefore, they are an important element of the character and identity of an area (its ‘sense of place’) and its biodiversity.”	The wording in the supporting text is considered to be sufficient. No change is considered necessary.
Wish the council to develop a more coherent and rigorous policy in order to more actively resist development in gardens. We welcome the commitment to resist development that occupies a disproportionate amount of a garden, notwithstanding permitted development rights, but “disproportionate” should be defined and the policy should be consistently applied going forward We believe ‘garden rooms’ should be subject to strict controls, possibly through Article 4 Directions and similarly on all forms of hard landscaping to restrict to certain proportions of the area and a requirement for permeable surfaces.	As noted, the Plan acknowledges the importance of gardens and seeks to protect gardens, where possible, although in many cases development in gardens does not require planning permission. The introduction of Article 4 Directions is not a matter for the Local Plan. It is not considered appropriate to define what is consider disproportionate as this would depend on specific circumstance and need to be assessed on a case by case basis. Policy CC11 Sustainable Drainage states that The Council will resist proposals including impermeable surfacing unless it can be demonstrated that this is unavoidable. However, the introduction of hard landscaping in gardens does not always require planning permission.

Main Issues	Councils Response
We applaud the intentions in 11.16, to retain important views and gaps. It is important not only to retain the protected views but to protect all views from the increasingly intrusive high tower blocks which are popping up everywhere and which lead to a loss of views, perspective, sky, horizon and landmarks which locate a place. These external spaces usually comes with harsh floodlighting causing light pollution. 1. We believe 'garden rooms' (beyond a basic 3msq 'shed' size) should be universally subject to strict controls, as Policy and possibly through Article 4 Directions 2. similarly on all forms of hard landscaping to restrict to certain proportions of the area and a requirement for retention of permeable surfaces. 3. Requirement for external lighting to be controlled 4. It is important not only to retain the protected views but to recognize the value of longer views and access to views of sky and trees and to protect these amenities.	The impact of external lighting is considered in Policy A1 Protecting Amenity. Policy NE2 Biodiversity considers the potential adverse impacts of development on habitats and species from light. It is not considered reasonable to seek to protect all views of trees and sky.

Policy NE2 - Biodiversity

Number of representations: approx. 23

Representations received from:

- Redington Frognaal Neighbourhood Forum
- Woodland Trust
- Camden Swifts Group
- Primrose Hill Conservation Area Advisory Committee
- Hilson Moran
- Swifts Local Network
- The Arch Co
- British Museum
- Highgate Neighbourhood Forum
- Kentish Town Neighbourhood Forum
- Highgate Society
- Environment Agency

Main Issues	Councils Response
Reference to swift bricks is welcome. Lack of reference to number of swift bricks to be installed means approach is unsound. (NPPG states developments should include swift bricks where possible, with the general aim across a development of a minimum of one nest box per unit. In paragraph 11.48 replace the sentence "between the host building and other buildings/obstructions", with 'beneath and in front of the swift brick'.	Local Plan para. 11.48 states that "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 that this is not feasible", which would equate to a minimum of one brick per building. We will propose a (minor) modification to the Planning Inspector to replace the quoted text as suggested.
Scope should be reconsidered to ensure it is proportionate. Part (A)(1) should be amended to refer to major new build schemes. A major railway arch scheme would have minimal opportunities for enhancing biodiversity. Part (A)(2) should be amended to refer to 'new build' as it currently captures changes of use.	The scope of Policy N2 is considered to be proportionate. The policy allows for applicants to submit a report conforming that the biodiversity baseline is nil and there are no prospects for enhancement where that is the case. It is considered appropriate and reasonable for Policy A(2) to expectation that all development - including changes of use - to have regard to any potential adverse impacts on habitats and species.
Reference to swift bricks is welcome. Lack of reference to number of swift bricks to be installed means approach is unsound Replace sentence "between the host building and other buildings/obstructions", with 'beneath and in front of the swift brick'.	We will propose a (minor) modification to the Planning Inspector to replace the quoted text as suggested.
Suggest the wording of policy NE2 A4 changes green roofs to living roofs and emphasise that living roofs alone are not sufficient mitigation for loss of soft natural surface and/or trees and shrubs and other vegetation of value to wildlife.	Green roofs are identified in the criterion as they are a major provider of biodiversity enhancements in the borough, especially within already fully developed sites. The term 'green roofs' is well-established and we consider it reasonable to retain the terminology. We agree that in principle it is preferable to retain soft surfaces at ground level however this is subject to the operation of permitted development rights.

Main Issues	Councils Response
Suggest the wording of policy NE2 A4 notes Neighbourhood Plans may have their own, higher net gain or urban greening scores.	The Council currently uses the Urban Greening Factors set out in the London Plan. There are no neighbourhood plans in the borough that currently set alternative neighbourhood level targets.
Suggest the wording of policy NE2 is amended to include "as ecological networks" after "offered by gardens and soft landscaping,".	The criterion already refers to gardens and soft landscaping forming wildlife corridors which can in turn form part of an ecological network.
Suggest the wording of paragraph 11.13 is amended to read "Some neighbourhood plans in Camden have also designated local ecological networks and identified.....".	It is not considered necessary to add specific reference to ecological networks identified in neighbourhood plans.
Suggest the wording of paragraph 11.41 includes the designation of private residential gardens as an ecological network in the Redington Frognal Neighbourhood Plan Area (policy SD 1).	It is not necessary for the boroughwide Local Plan to add reference to specific neighbourhood plan policies.
Policy NE2 is welcomed, and NE2 A7 is strongly welcomed.	Support welcomed.
Policy NE2 it is suggested that a point should be added/mentioned in the section i.e. Linking up with local resident's groups such as local conservation groups.	We consider this is already addressed through the Council's Statement of Community Involvement which sets out how applicants are expected to engage with the community when preparing a planning application.
11.37 It is a positive indication that the Council plans to prepare a baseline ecological assessment.	Support welcomed.
To deliver "a greener and healthier environment" is a shared responsibility of the Council, the commercial developers and residents - and the specified tasks of biodiversity should be identified, clarified and agreed at the planning stage of those major projects so that they would be measured and achieved against the objective. How would the Council's emerging Green Infrastructure Strategy be delivered?	The Council secures management and monitoring plans (via a planning obligation) to ensure that areas of nature conservation value are retained/created and enhanced. Further detail about individual green infrastructure projects and their implementation will be set out in the Council's Green Infrastructure Strategy in due course.
Integrating biodiversity into buildings (page 434) 11:47 It is suggested that a checklist should be in place thus the Council officials or independent professionals should be able to form an opinion about whether the biodiversity is "through the innovative integration of habitats, plants and wildlife into buildings through good architectural design".	We consider this is already adequately addressed through existing procedures.
Paragraph 11.50 As a local residents' group, we would like to assist the Council to establish a periodic reporting program with measures/benchmarking so that we know how well or not the plans have progressed.	The responsibility for implementation and monitoring of planting and biodiversity enhancement rests with the applicant; however, the Council welcomes local organisations and residents reporting any concerns they have regarding new developments / nature conservation areas.
We would like the Plan to promote the development of tactics of persuasion for these excluded groups, to encourage them to follow the principles of the Camden Plan. Such tactics could include publicity, education, and incentives, and examples, e.g. in Camden's own parks. The Plan does not recognise the cumulative effect of many smaller developments; for instance, the rear extensions or the felling of trees and shrubs, in neighbouring houses. Policies should be developed to address this problem.	The Council's adopted Biodiversity Strategy (Creating space for nature) and the resulting action plan, rather than the Local Plan, is considered the most appropriate means of addressing the matter of publicity and education relating to biodiversity. The Local Plan includes policies on Extensions and Alterations to Existing Buildings (D4) and on the protection of trees (NE3). Paragraph 11.12 states: "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".
The BM welcomes the addition to the Regulation 19 version of the Plan of the supporting text at paragraph 11.45 which acknowledges that the delivery of BNG will vary depending on the site. It requests that this text is further augmented to include reference to a site-wide approach to BNG delivery where this is appropriate for large Estates in Camden and is agreed with the Council.	We consider that this matter is most appropriately addressed through guidance on the operation of BNG. We will pass this onto the Council's Nature Conservation Officer.
Same as before - previous comments were not addressed "1 - Emphasis on gardens should be referencing native planting within gardens, as ornamental and non-native species can become problematic for biodiversity of an area."	Where new planting is proposed, the draft Local Plan states at paragraph 11.40: "as a benchmark 50% of total planting should be native species and 50% of species of recognised value to biodiversity, such as those on the Royal Horticultural Society's 'Plants for Pollinators' list. Biodiversity Net Gain requirements for new development and/or Urban Greening Factors set out in the adopted London Plan may contribute towards the achievement of this benchmark. It is not possible for the Council/ planning system to control planting mix within existing residential gardens.

Main Issues	Councils Response
Policy NE2: Biodiversity We are supportive of this policy and request the council to consider recommendations shared in our Regulation 18 response (dated: 13 March 2024).	We have cross-referenced the Local Plan policy on Sustainable Drainage in the introduction to Policy NE2 (at paragraph 11.30). Also, we have acknowledged the relevance of the London Plan's 'Urban Greening Factors' in delivering biodiversity gains in the supporting text to NE2 (paragraph 11.45). In paragraphs 11.44 to 11.46, we have outlined how Biodiversity Net Gain operates and highlighted the particular importance of the canal as a major water body. The Council is intending to prepare further detailed guidance to assist applicants in complying with BNG legislation. It is not considered necessary to include this detail as part of the Local Plan.
A.1. While we welcome the commitment to require that all major schemes, and “those that have the potential to adversely impact biodiversity”, should require an ecological assessment, we consider that this commitment needs to be strengthened to address the potential gradual cumulative impact of more minor schemes. The contribution of even smaller sites, as elements of the ecological corridor, should be a factor in assessing potential impact and the precedent such consents could set for its progressive degradation.	We consider that the use of ecological assessment in the borough is reasonable and proportionate as it focusses on schemes where the greatest impact is likely to arise. It would be onerous to expect all minor schemes to undertake ecological assessments/ assess cumulative impacts. Paragraph 187 of the National Planning Policy Framework states that planning policies and decisions should protect biodiversity commensurate with statutory status and relative quality.
A.4. Where green roofs are provided, or required, it is essential that arrangements are in place to ensure that they are regularly monitored for maintenance in good condition.	Paragraph 8.152 of the Local Plan states that “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.” The Council would expect to see details for the roof to show that it can be managed appropriately over time.
It is essential that a minimum period for ecological survey should be required in each case; for larger sites, and particularly those which form a part of an ecological corridor or are adjacent to known sites of ecological value, this should be of no shorter duration than a full season.	Camden’s adopted planning guidance on Biodiversity sets out the Council’s expectations relating to biodiversity surveys. This states that surveys must be carried out using a recognised methodology and at an appropriate time and of an appropriate duration and frequency. Given the variations in development types/sizes, habitat characteristics and species, we do not consider that a single benchmark in the Local Plan would be helpful.
11.40. We suggest that this be amended to read “at least 50% of total planting should, be native species.”	We will propose a modification to clarify the intention that at least 50% of planting should be native species.
Local Nature Recovery Strategies (LNRS) are a statutory requirement in the Environment Act 2021 (the duty in London rests with the GLA as the responsible authority).The draft Camden Local Plan does make reference to LNRS in narrative paragraphs 11.26 and 11.31 but there is no reference to LNRS in any of the policies. Policy NE2 would seem to be the best place to remedy this omission.	Paragraphs 11.42 and 11.43 reference 'Nature Recovery Networks' as a means of achieving biodiversity enhancement.

Policy NE3 – Tree planting and protection

Number of representations: approx. 27

Representations received from:

- Redington Frogna! Neighbourhood Forum
- Woodland Trust
- Primrose Hill Conservation Area Advisory Committee
- Hilson Moran
- The Arch Co
- Kentish Town Neighbourhood Forum
- Highgate Society
- Highgate Conservation Area Advisory Committee
- Resident
- Belsize Society

Main Issues	Councils Response
Should refer to 'new build major development' or 'major development'. Spatial constraints of arches mean landscaping proposals are very limited and this should be recognised in the supporting text.	Part 8 states that additional trees and vegetation should be incorporated "wherever possible", which would allow for consideration of circumstances such as development in arches.
Would like it noted that trees should not be felled to facilitate development.	It is not considered reasonable to resist all felling of a tree to facilitate development. New tree planting may also in some circumstances provide an improvement over the existing situation.
The policy should be more ambitious in tree planting standards for new development. It should also specify soil volume requirements.	We consider the benchmark for tree planting to be reasonable. Many sites in Camden are constrained in their ability to accommodate trees. Too high a standard could result in applicants trying to cram too many trees / smaller trees onto a site, with less desirable outcomes. Paragraph 11.68 already states that where new planting is being proposed, soil conditions should be taken into account, including soil volume and soil type. Further the draft Local Plan states at paragraph 11.71 that where a detailed landscaping plan is required, the management plan should demonstrate how new tree planting will be sustained and adequately managed in accordance with British Standard 8545. We therefore consider that soil conditions are adequately addressed.
There should be a commitment to preserve hedges where possible and require these as boundaries.	Policy T5 - Parking and car-free development resists the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking. Policy NE2 supports the reinstatement of "permeable fencing", however we consider that criterion (5) should emphasise the benefits of hedges as a permeable form of boundary.
It should be noted that the Council will apply government guidance 'Tree Preservation Orders and trees in conservation areas' specifically paragraph 008 and "Site visits should record the trees or trees' importance as a wildlife habitat." Paragraph: 022.	National guidance is already used by the Council's Tree Officers and applicants and it is not considered that a reference to one particular section is necessary within this policy.
Policy NE3 is welcomed.	Support welcomed.
Policy NE3 is supported.	Support welcomed.
With regard to mature trees, Camden's street trees also need greater protection as well as those in gardens and parks. We are pleased to see that has been covered by proposed policy.	Support welcomed.
Root protection areas of neighbours' and street trees and large shrubs must be shown on applicant's drawings and should be protected in Decisions and/or Conditions.	This is covered in Camden's Local Area Requirements (section on 'Tree Survey/ arboricultural assessment), which is separate from the Local Plan.
The policies were very impressive and it was good to see the thought that the council had put into the whole issue of trees, including maintenance care and protection. We would be interested in perhaps a scheme whereby people can sponsor a tree and offer to help the Council look after it. It is also suggested that it would be good if the council could be proactive and involve local residents, for example asking if local residents would like a tree.	Support welcomed. We will pass this comment onto the relevant Council officers.
Could the contractors who cut back the trees do this in a much more sensitive way? Removing some branches and reducing others but does not cut them off ruining the beauty and usefulness of the tree.	We will pass this comment onto the relevant Council officers.
Police NE3: Tree planting and protection (page436) 9. Replacement of trees - who would check on the applicant if the replacement has been made?	Where a landscaping scheme or planting plan has been secured through a planning obligation, the developer is required to report to the Council to evidence that it is being implemented. Replacement tree planting may also be secured by planning condition and evidence requested to confirm compliance.
Guidance is fine but monitoring measures are required.	The landscaping scheme/ planting plan will include a management plan and monitoring/reporting requirements.
11.71 It is good to know that the Council is expecting the detailed landscaping scheme or planting plan to include a management plan, to be secured by a planning condition or a Section 106 agreement.	Support welcomed
Seems fine and in line with previous policies and BNG inclusions.	Support welcomed.
Policy NE3. A.1. We suggest that the word "significant" be omitted. If a tree is of "amenity, historic, cultural and / or ecological value", it should be deemed to be "significant", and justification should be required for its removal.	National Planning Practice Guidance on Tree Preservation Orders and trees in conservation areas makes clear that there are a number of factors that taken together determine whether a tree has amenity value and notes that "Public visibility alone will not be sufficient" (to warrant an

Main Issues	Councils Response
	Order). The wording in the Local Plan takes into account the range of considerations involved and that it is possible for a tree to have an “amenity value” where it provides a low level of amenity. We consider that the wording, which also appears in the adopted 2017 Local Plan (Policy A3 j.) is appropriate.
A.3. Clarify “where appropriate”.	Further detail on the surveys required by the Council is set out in Camden Planning Guidance on Trees, which is referenced in paragraph 11.59.
A.5. Monitoring of tree protection measures on a development site is essential.	The Arboricultural Method Statement includes monitoring arrangements and should be developed in liaison with the Council. The Council’s Tree Officers undertake inspections of sites to ensure that measures have been put in place to protect trees and, subsequently, ad hoc visits will be made during the demolition/ construction phase to check that these measures are still in place.
We suggest that a “year equivalent” planting should be required; in this way, if a 100-year-old tree is to be lost, it should be replaced, on site if possible but, if not, as close to the site as feasible, by ten 10-year-old saplings of 20 5-year-old saplings. Where this is not possible, a “year equivalent” as close as possible to the age of the felled tree should be sought.	We consider that the approach set out in the Local Plan is proportionate and reasonable. BNG legislation (where applicable) also provides a means to assess the baseline biodiversity value and the potential ‘compensation’ value for any trees to be lost.
We consider that requiring developers merely “to have regard” to tree protection (11.59) is in itself sufficient to ensure compliance, and that a regular monitoring programme is necessary.	The Council considers that the wording is reasonable and appropriate. We expect all tree protection measures are to be installed in line with the approved tree protection details and prior to commencement. The Council’s Tree Officers undertake inspections of sites to ensure that measures have been put in place to protect trees and, subsequently, ad hoc visits will be made during the demolition/ construction phase to check that these are still in place.
11.70. Again, while it is essential to require “a robust management regime” for newly planted trees, landowners cannot always be relied upon to report the failure of new planting, and monitoring is essential. Perhaps local community groups could have a role in reporting newly-planted trees which fail to thrive.	The Council expects an applicant to implement the landscaping scheme/ planting plan in line with approved details. Paragraph 15.10 of the Local Plan states that, where necessary, the Council retains the right to make use of its enforcement of powers to ensure that planning permissions are implemented in line with what has been agreed.
We strongly welcome this robust policy for woods and trees, with requirements to protect existing trees and secure additional tree planting in the borough. In particular, we support points A3, A6, A8.	Support welcomed
The draft Plan includes insufficient practical measures to meet the NPPF requirement that existing trees are retained wherever possible. Measures are needed to protect the vast majority of trees not eligible for TPO status. Of exceptional importance are the green corridors in the back gardens of residential streets and a method of protecting these needs to be adopted urgently. Plan does not incorporate sufficient measures to preserve gardens. Encouraging to see the draft Plan acknowledge the many benefits of trees. Pleasing to see ambitions when TPO trees are felled and incorporation of green infrastructure into major development. Need to ensure there is replacement planting of equivalent value. Outside of CAs, there is no requirement for the Council to be notified of works to trees, including felling. Need to protect trees in CAs that do not satisfy criteria of being TPOs recognising their value in protecting against pollution and for biodiversity. If the Council do not give sufficient protection to green corridors/ trees in green corridors, they won't exist in 5 years time Define "disproportionate" loss of green space Target for tree canopy increase seems unambitious Expectation that 2 new trees will be planted for every tree lost is unlikely to result in a significant increase in canopy cover More enforcement of planning commitments for trees.	We consider that the Plan's approach to protecting trees is appropriate, taking into account the powers local authorities have in relation to trees, and is consistent with national policy.

Main Issues	Councils Response
The draft Plan includes insufficient practical measures to meet the NPPF requirement that existing trees are retained wherever possible. Measures are needed particularly to protect the vast number of trees in Camden that are not eligible for TPO status. Camden should adopt a “non-standard” method of valuing trees more appropriate to an urban setting than that currently used. Similarly, the draft Plan acknowledges the importance of gardens as green spaces in densely populated areas but requires more rigorous measures to preserve and protect them. The Plan should give specific consideration and protection to green corridors and to develop new green corridors where opportunities exist.	The Council considers that the Plan's approach to protecting trees is appropriate, taking into account the powers local authorities have in relation to trees, and is consistent with the NPPF. Part A.7 of Policy NE2 Biodiversity states that the Council will 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.
It is encouraging to see that the draft Plan acknowledges many of the benefits of trees. Camden needs to be more rigorous in ensuring that, in the rare circumstances where TPO-protected trees need to be felled, replacement planting of trees of equivalent value takes place or, if that is not possible, that a financial contribution is obtained to finance replanting. Little protection is afforded to the huge numbers of trees in Camden that do not have significant amenity value but nevertheless are vitally important to the character of their neighbourhoods and in providing wildlife habitat and biodiversity, offering shade and cooling, and filtering pollutants from the air. Stronger protections are needed for the vast number of trees in Camden that are not eligible for TPO status, particularly in back gardens. The National Planning Policy Framework requires that existing trees are retained wherever possible, but the draft Plan lacks measures that will achieve the retention of trees. Outside of Conservation Areas (CAs), the Council does not even need to be notified of works to trees, including felling. Camden needs to address this gap in its ability to control the felling of non-TPO trees on private land as a matter of urgency. The draft Plan acknowledges the exceptional importance of green corridors of trees and vegetation in back gardens in providing important wildlife corridors within the urban environment, and the Plan should give specific protection to such green corridors.	The Council considers that the Plan's approach to protecting trees is appropriate, taking into account the powers local authorities have in relation to trees, and is consistent with national policy. The Local Plan seeks to protect gardens and trees where possible, although in many cases development in gardens or changes to trees do not require planning permission. Part A.7 of Policy NE2 Biodiversity states that the Council will 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.
The target increase of 3.7% over the 30 years from 2016 to 2035 seems unambitious. It would help readers of the Plan to understand the challenge involved if statistics were included around the percentage canopy coverage in 2016 and the increase or decrease over the decade to 2025. Camden's expectation that at least two new trees will be planted for every tree lost is welcome, but has limited applicability and is unlikely to result in a significant increase in canopy cover.	The Council's tree canopy target, which is referred to in the Local Plan, is set by in Camden's Tree Panning Strategy. Further detail is available in that document.
It is pleasing that the draft Plan has ambitious plans to incorporate green infrastructure into future major developments at Murphy's Yard, Regis Road and West Kentish Town Estate. The draft Plan needs to provide for an improved system of control and enforcement to ensure that developments fulfil planning stage commitments about trees and green spaces.	Comment noted. The enforcement of planning stage commitments is not a matter for the Local Plan.

Policy NE4 – Water quality

Number of representations: approx. 4.

Representations received from:

- Highgate Society
- Highgate Conservation Area Advisory Committee
- Environment Agency
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
The approach in Policy NE4 is welcomed.	Comment noted.
Rainwater is part of the Natural Environment, and it should be discussed in the section.	Rainwater is discussed in Policy CC9 (Water efficiency).

Main Issues	Councils Response
Policy NE4: Water Quality We are pleased to see the inclusion of the Thames River Basin Management Plan and the Water Framework Directive in the supporting text for this policy.	Support welcomed.
We welcome this section, but consider it needs to be made clearer that the implications go well beyond the mere issue of “water quality”. It is essential that the “adverse effects of groundwater diversion” should include the impact of basements on ground water flow and consequent impacts on gardens and trees both within and beyond the site, and on neighbouring properties. Basement Impact Assessments must therefore be comprehensive and thorough, and take into account the hydrology of the surrounding area and not just the site alone.	The effects of basement development on water is covered by 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:.....2 the structural, ground, or water conditions of the area;" A Hydrogeological Risk Assessment will be required where development poses a risk in the borough's Source Protection Zone (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.)

Chapter 12 – Design and Heritage

Number of representations: approx. 3

Representations received from:

- Primrose Hill Conservation Area Advisory Committee
- British Land
- London Property Alliance

Main Issues	Councils Response
The PHCAAC is seriously concerned that the Plan should not undermine heritage. Heritage policy has been the root of many aspects of Camden’s successful economic growth.	Comment noted.
Chapter 12: Design and Heritage Camden’s unique character and identity is what makes it the place it is today which is an attractive place to live, work and visit. We strongly support the Council’s aspirations for good design that supports that character.	Support welcomed.
We strongly support the council’s aspiration for good design which supports this character.	Support welcomed.

Policy D1- Achieving design excellence

Number of representations: approx. 36

Representations received from:

- Belsize Conservation Area Advisory Committee
- Redington Frognal Neighbourhood Forum
- Lab Tech
- Primrose Hill Conservation Area Advisory Committee
- Land Sec
- The Arch Co
- British Museum
- Waterlow Park Trust Advisory Group
- British Land
- St George West London
- Kentish Town Neighbourhood Forum
- London Property Alliance
- Highgate Society
- Highgate Conservation Area Advisory Committee
- Belsize Society

Main Issues	Councils Response
Support objective of achieving excellence in architecture, responding to climate change, improving the health and wellbeing of Camden's communities and celebrating the diversity of Camden's people and place. Celebrating and reflecting the diversity of the communities through high quality interpretation, events, public art and decorative features co-designed with local people should not be a policy requirement. Retention of an architect post-planning should not be a decision for the LPA and this should be removed from the plan.	Support welcomed. We consider that it is reasonable and appropriate for the design of public spaces to consider the diversity of the communities they are within. We also consider the use of architect retention clauses to be reasonable and appropriate. It's suggested in National Planning Practice Guidance on Design as a mechanism for ensuring the quality of development is maintained between permission and completion (i.e. para. 015 Reference ID 26-05-20191001).

Main Issues	Councils Response
Placemaking proposals should not compromise the continued operations of businesses and not adversely affect the public highway, especially industrial/ semi-industrial occupiers Support the wording in D1 B (6) and (7). B(13) places unreasonable restrictions on servicing contrary to para. 36 of the NPPF. The spatial limitations of arches mean that servicing primarily needs to take place on-street.	Support for D1 (B) welcomed. We do not consider that Part B.13 places unreasonable restrictions on servicing. More detail on the Plan's approach to servicing is set out in Policy T6.
Suggest Policy D1 A is amended to include reference to the climate and ecological emergency.	We will propose a modification to add additional wording.
Suggest Policy D1 B is amended to include "and designated non-heritage assets".	Policy D1 B specifically relates to heritage assets. Reference to non-heritage assets is not therefore appropriate.
Suggest Policy D1 B.15 is amended to include "incorporate nature-based solutions, wherever possible."	Part C.6 of this policy states that the Council will expect public space to 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. Furthermore, Policy NE2 Biodiversity sets out the Council's requirements for delivering biodiversity enhancements in Camden. Given this the additional wording is not considered necessary.
Suggest Policy D1 C 6 is amended to replace "biodiversity" with "biodiverse natural habitat".	The use of the term 'biodiversity' is considered to be appropriate here and consistent with other references in the Plan, and aligns with Policy NE2 Biodiversity.
Suggest Policy D1 D is amended to include "and neighbourhood plans".	We will propose a modification to add reference to neighbourhood plans.
Suggest amendment to paragraph 12.8 to include this bullet point "landscaping and natural habitat creation".	The references in 12.8 relate to buildings, rather than the surrounding area. No change to wording is considered necessary.
Suggest the bullet points in paragraph 12.11 have been incorrectly separated.	We will propose a modification to correct this.
Suggest amendment to paragraph 12.8 to read "requesting that detailed designs, scaled drawings, plans, elevations, sections, landscaping and natural habitat provision and supporting information are provided to illustrate a proposal, where appropriate;"	Para 12.12 refers to mechanisms the Council could use at the planning application stage to secure design excellence and the bullet point in question relates to information the Council would expect the applicant provide as part of their planning application. The proposed wording is therefore not considered appropriate.
Suggest paragraph 12.13 is amended to read "The landscaping, 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, ecological mitigation (e.g. by incorporating biodiverse natural habitat), local food production and Sustainable Drainage Systems (SuDS), and provide useful amenity space."	Para 12.13 relates to the design of public spaces in general. Para 12.14 goes on to refer to hard and soft landscaping. The use of the term biodiversity here is consistent with the language used elsewhere in the Plan. No change to wording is therefore considered necessary.
Policy D1 - note the importance of context in the development of design excellence and support the expectation at D1 B.3-4 that development will be expected to 'preserve or enhance the historic environment and heritage assets in accordance with Policy D5 (Historic Environment)' and will be expected to 'respect local views and preserve protected strategic views	Support welcomed.
Paragraph 12.11 is welcome and supported.	Support welcomed.
Paragraphs 12.21- 12-23 are welcome and supported.	Support welcomed.
Policy D1 xii is becoming more crucial especially given the required reduction in carbon emissions elsewhere in the document. So the wording provides both applicants and planners little guidance on how to interpret and enforce this clause.	Further guidance is set out in the Council's supplementary planning guidance on design.
We support the objective of achieving excellence in architecture, responding to the climate change emergency, improving the health and wellbeing of Camden's communities and celebrating the diversity of Camden's people and places.	Support welcomed.

Main Issues	Councils Response
Part C (2) states that where public spaces are provided as part of developments the Council will require that these spaces celebrate and reflect the diversity of the communities, they are within through high quality interpretation, events, public art and decorative features codesigned with local people. Whilst there may be instances where co design is appropriate, we are concerned with this being a requirement of policy and this reference should be removed.	Part C.2. refers to co-design as one of the examples of how schemes can celebrate and reflect the diversity of the communities they are within, rather than as a requirement.
We also support the recognition of how the design of public spaces, and the materials used, is important and welcome that spaces around developments should be considered at the same time as the developments themselves. Where improvements to spaces around developments are proposed as part of the planning application these improvements should be recognised as public benefits and given appropriate weight in the planning balance.	Support welcomed. Comment noted.
Policy D1 3 The issue of excessive street furniture has become critical in certain areas (Kentish Town High Street for example) where pavements are narrow.	Comment noted.
Paragraph 12.151 KTNF supports this approach.	Support welcomed.
Reflecting on the Historic England guidance the BM considers that policy D1 part B, 3 could be reworded to seek the 'conservation and enhancement' of heritage assets. This would better reflect the wording of Policy D5 Historic Environment which has been updated since the Regulation 18 stage to 'conserve' rather than 'preserve' heritage assets. BM notes that both terms are used throughout various parts of the Plan and suggests these uses should be reviewed to ensure the intended meaning is being conveyed in each instance.	We will propose a modification to address this matter.
Para 12.12: Clarify what is meant by "architect retention clauses in legal agreements". Add new bullet point "Applying rigorous enforcement of planning consents, especially in conservation areas.	Further guidance is set out in the Council's Camden Planning Guidance on Design. The enforcement of planning consents is not a matter for the Local Plan. No change to wording is therefore considered necessary.
B.20. Design is of crucial importance to the wider community. We suggest adding the following point: "be able to demonstrate meaningful community engagement, in accordance with para. 137 of the NPPF, given the high priority placed upon heritage and design by the community, and the often significant level of local knowledge and expertise in local history and character possessed by local groups actively engaged in the planning process, not least because such early engagement could result in a fast planning process by eliminating objections resulting from failure to carry out such consultation."	Para's 12.21 - 12.23 set out the Council's overarching approach to community engagement in relation to the design of schemes. Further information is also set out in the Council's Statement of Community Involvement. No change to wording is therefore considered necessary.
12.12. add further bullet point: "the use of Development Management Forums to ensure effective community input will be considered when the proposals are of demonstrably of a high level of community interest."	Para's 12.21 - 12.23 set out the Council's overarching approach to community engagement in relation to the design of schemes. Further information is also set out in the Council's Statement of Community Involvement, which includes a section on Development Management Forums. No change to the wording is therefore considered necessary.
12.22. Community Engagement: we support these aims, but would like to see a specific reference to the necessity of applicants, particularly of more contentious schemes, observing the requirements of para. 137 of the NPPF (see above). Add this line after "consideration" (line 7).	Further information on the Council's approach to community engagement to be undertaken as part of the planning application process is set out in the Council's Statement of Community Involvement. It is not necessary for the Local Plan to duplicate the content of the NPPF. No change to wording is therefore considered necessary.
We suggest adding to 12.26.: "Where the proposal is of demonstrably high public interest, a Design review Panel would be expected to familiarise itself with the community viewpoint prior, take it into account when making its decision and, where appropriate, allow community representatives to make their case at Design Review Panel Meetings." This is particularly important if an applicant is afforded the opportunity to address a Design review Panel.	The operation of Design Review Panels is not a matter for the Local Plan.
Fully support Camden's position on design excellence, and acknowledgement of the importance of community	Support welcomed.

Main Issues	Councils Response
engagement within the design and planning application process.	
Policy D1 C2 should be qualified by including "where appropriate".	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 developers have regard to this. It is considered that the policy is worded sufficiently flexibly and no change to wording is therefore considered necessary.
Policy D1 C3 should be qualified by including "where appropriate".	Policy D1 Part C.3 already includes the wording "where appropriate".
Reference to architect retention clauses should be removed, design quality should be controlled through conditions.	The practice of using architect retention clauses in legal agreements is established in the existing Camden design CPG. This is not a new expectation on developers. Its purpose is to require the developer to retain the architect for the duration of the project and thus ensure the design is carried out as intended and in accordance with the approved drawings.
Support Policy D1 (Part A)'s objective of achieving excellence in architecture, responding to climate change, improving the health and wellbeing of Camden's communities and celebrating the diversity of Camden's people and place.	Support welcomed.
Policy D1 (Part C2) - Whilst there may be instances where co-design is appropriate, we are concerned with this being a requirement of policy and this reference should be removed.	Co-design is listed as an example of how spaces can celebrate and reflect the diversity of the communities they are within. It is therefore considered that the policy is worded sufficiently flexibly and no change is necessary.
Remove reference in Paragraph 12.12 to the use of architect retention clauses in legal agreements	We consider the use of architect retention clauses to be reasonable and appropriate. It is suggested in National Planning Practice Guidance on Design as a mechanism for ensuring the quality of development is maintained between permission and completion (i.e. para. 015 Reference ID 26-05-20191001)
Many valued local views are referenced only within SPDs making them difficult to access and at risk of being overlooked. Bringing together all locally designated views into a single, accessible document as part of a new Local Plan would align with this best practice, increase transparency, and ensure consistent protection and enhancement of Camden's unique townscape and landscape assets. Council should consult Conservation Advisory Committees to prepare a consolidated list to reflect local knowledge and community priorities.	The Plan is intended to be read in conjunction with SPDs such as Conservation Area Character Appraisals as well as neighbourhood plans (which also in some cases feature local views). These documents, and the views within them, are amended outside of the process for updating the Local Plan. We do not consider it necessary or appropriate to include this information in the Local Plan.
Request the formal inclusion of the view from Waterlow Park towards London, notably the Dome of St Paul's Cathedral as a locally designated view. This is integral to the area's character as described in the CACA. We have submitted a request to the Greater London Authority seeking formal designation of the sightline in the new London Plan	The Local Plan reflects the strategic views of St Paul's and London identified in the London View Management Framework prepared by the Mayor of London / GLA to support the London Plan. As the view from Waterlow Park towards London / St Paul's would impact a number of boroughs, its designation is most properly considered as a strategic view by the GLA. The Local Plan will reflect any new view designation made by the GLA.
We fully support this though there is conflict between these aspirations and those of tall buildings. Community engagement often seems a tick-box exercise and should be managed by an independent organisation. More honest and rigorous consultations with independent verification and reporting of statistically validated reports is needed. There need to be stronger policies on developments having better post-build servicing and delivery arrangements and a credible plan needs to be produced and verified as fit for purpose. More honest and rigorous consultations with independent verification and reporting of statistically validated reports is needed. A clarification of the composition, role and process of the Design Review Panel is needed An excellent example is the new approved scheme for 100 Avenue Road. Among other harms, this hugely damaging scheme will destroy an important and heavily used pedestrian piazza and we feel consideration of this is a major omission.	Support welcomed and comments noted. Policy T6 Sustainable Movement of Goods, Services, and Materials sets out the Plan's approach to servicing, including the requirements for Servicing and Deliveries Management Plans. Further information on the Design Review Panel is on the Council's website here . Site allocation W12 -100 Avenue Road reflects the fact that the site has planning permission and works have commenced. Any subsequent application will be assessed against the allocation and all relevant Plan policies, including those on design (D1) and open space (SC4).

Policy D2 – Tall buildings

Number of representations: approx. 45

Representations received from:

- GLA
- Network Rail
- Belsize Conservation Area Advisory Committee
- Riverside and Country Partnership
- Primrose Hill Conservation Area Advisory Committee
- Land Sec
- Reef and Partners Ltd
- The Belsize Society
- UCL
- Resident
- LB Barnet
- YC CFQ
- Stadium Holding Capital
- St George West London
- Places for London
- LB Islington
- Regal
- Kentish Town Neighbourhood Forum
- Unite Group PLC
- Lendlease and the Euston Landowners
- Kilburn and District Properties
- London Property Alliance
- Highgate Society
- Highgate Conservation Area Advisory Committee
- Heath and the Hampstead Society

Main Issues	Councils Response
I challenge the assertion that the following sites are “Locations where tall buildings may be an appropriate form of development”: F C2 Regis Road and Holmes Road Depot. G C3 Murphy Site. K C13 West Kentish Town Estate. L C15 Wendling Estate and St Stephens Close. N C23 Former Flats 121–129 Bacton, Haverstock Road. (see Figure 22 Tall Buildings on p 456 - reproduced below).	The locations identified as potentially suitable for tall buildings in the Local Plan reflect the findings of the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.
The protections to views and vistas afforded by The London Plan (2021) and other legislation should apply to all the locations included in “Table 12 Locations where tall buildings may be an appropriate form of development” (p457).	Relevant site allocations identify that the site is within a view identified in the London View Management Framework. Applications for tall buildings will be assessed against all relevant policies including Local Plan policy D2 on Tall Buildings; policy D1 on Achieving Design Excellence, which seeks to preserve protected strategic views; policy D5 on the Historic Environment, and London Plan Policy D9 on Tall Buildings. Protected strategic views are shown on the Local Plan Policies Map.
Suggest Policy D2 is amended to require evidence that a tall building is the only way to achieve the building requirement – for example, medium-rise high-density developments have long been recognized as preferable to tall buildings for housing.	Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies. It is considered that the criteria set out in Policy D2 are sufficiently comprehensive to assess whether a proposal is appropriate / justified. No change to wording is therefore considered necessary.
Policy D2 C8 is welcomed, how can it be made effective and not merely aspirational?	Support welcomed
Paragraphs 12.37 and 12.87 are strongly endorsed.	Support welcomed
Policy D2C9 is inconsistent with D1B4 and should be amended to replace "consider" with "respects".	We consider that the existing wording is appropriate. No change proposed.
Suggest Policy D2 part 5 is removed as we do not believe that Policy D2 needs to reference affordable housing. Policy H4 will also apply in any event to tall building proposals, and it is important the policy is read as whole.	The delivery of affordable housing is a key priority for the Council. Given this it is considered appropriate for this policy to cross refer to Policy H4 Maximising the Supply of Affordable Housing.
Challenges the assertion that (F C2 Regis Road and Holmes Road Depot; G C3 Murphy Site; K C13 West Kentish Town Estate; L C15 Wendling Estate and St Stephens Close; N C23 Former Flats 121–129 Bacton,	Local Plan policy D2 sets out our approach to tall buildings, which sets out the criteria against which they will be assessed.

Main Issues	Councils Response
Haverstock Road) are “Locations where tall buildings may be an appropriate form of development”. Views from Parliament Hill and Kenwood House on Hampstead Heath are protected in law. However, the view protected is not just a narrow sliver between tall buildings. Not only are the narrow sight lines from individual points in Camden to landmarks such as St Pauls protected, the wider panoramas from several points in Camden are also protected by the London Plan (2021): Table 7.1 - Designated Strategic Views London Panoramas Ref View 1 Alexandra Palace to Central London 2 Parliament Hill to Central London 3 Kenwood to Central London 4 Primrose Hill to Central London 5 Greenwich Park to Central London 6 Blackheath Point to Central London The protections to views and vistas afforded by The London Plan (2021) and other legislation should apply to all the locations included in “Table 12 Locations where tall buildings may be an appropriate form of development” (p457). The “Infrastructure Requirements” sections in each Site Allocation in “Chapter 4 - Central Camden” should reflect the above protection of views of Central London from Kenwood and Parliament Hill.	
Suggest amendment to the following site allocations 'Infrastructure Requirements' to read “Development must...” comply with Policies HC2, HC3 and HC4 of The London Plan (2021) and any other relevant laws, regulations and policies which protect views to Central London from damage by excessively tall, massive or unsightly and inappropriate developments.” Table 12 Locations where tall buildings may be an appropriate form of development F C2 Regis Road and Holmes Road Depot G C3 Murphy Site K C13 West Kentish Town Estate L C15 Wendling Estate and St Stephens Close N C23 Former Flats 121–129 Bacton, Haverstock Road.	All applications for tall buildings will be assessed against the criteria in policy D2, which includes consideration of historic context and the relationship between the building and hills and views, policy NE1 - Nature Environment, which states we will take into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath, Policy D1 on Design, policy D5 on Heritage, London Plan Policy D9 on Tall Buildings, which states that the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals, and all other relevant policies. The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study, which was carried out in accordance with London Plan policy and guidance.
Welcome Policy D2 and other policies which refer to the impact of views of proposed tall buildings.	Support welcomed.
KTNF favours medium density development and likes to see efforts towards this end in design layouts and plans.	Comment noted.
Disappointed that determination has been made for the possibility of very tall buildings up to 63m – 82m already permitted (W12) 54m - 61m already granted (W2), 53m (C7), 52m (C2) and 40-45m (Allocations C3, 10, 11,13, 14, 15, 23 We consider these heights excessive in this part of London as we gradually move away from the centre. We consider them damaging for our local residents who view these areas and use them. We do feel comments made in earlier submissions in this Local Plan process have not been taken on board.	The Plan reflects the results of the Camden Building Heights Study carried out to ensure consistency with the London Plan. Applications for tall buildings will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
The views from our open spaces are especially valuable, vitally important for our mental health and as high rise encircles their realm, diminished their effect and increases the stress of the encroaching city hemming in nature. This is in contrast to many of the high-quality lower rise but high-density housing schemes of the recent past (largely under Sidney Cooke’s time as Camden’s Borough Architect). This type of innovative solution may provide a much better quality of life for residents and locals and should be explored and sites set aside for experimentation rather than simply going for height which will destroy areas in perpetuity.	Comment noted. The Plan reflects the results of the Camden Building Heights Study carried out to ensure consistency with the London Plan. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
We are surprised and disappointed the highly significant new 100 Avenue Road development (W12), on the border of area C, has not been given any detailed consideration in this plan.	Site allocation policy W12 100 Avenue Road sets out key considerations for the development of this site.

Main Issues	Councils Response
Policy D2 Fig 22: Sites g,f,k,l and n would appear to be highly visible from Parkhill and Upper Park Conservation area. Building heights should respect this.	The Plan reflects the results of the Camden Building Heights Study carried out to ensure consistency with the London Plan. Applications for tall buildings will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
Policy D2 Tall Buildings A. We are concerned that simply stating a blanket height for tall buildings of 30m outside the Central Activities Zone could still result in unacceptable impacts on sensitive areas. A lower limit should be specified for developments within a certain distance from Open Spaces, Conservation Areas.	Policy D2 Part A sets out the definition of what is considered to be a tall building in the Camden context, in line with the London Plan and the Camden Building Heights Study. It does not set an acceptable height for buildings. Applications for tall buildings will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
C11. After “overshadows”, add: “or affects the character of amenity of”, since tall buildings can cause substantial harm without actually overshadowing.”.	It is considered that impacts on character and amenity are appropriately covered by policy D2. No additional wording is therefore considered necessary.
Community input into the assessment of “design quality” must be an integral element of the overall planning process.	Comment noted. The Council's Statement of Community Involvement sets out how the Council will consult the local community as part of the planning application process.
We don't, for a number of reasons, support high rise development outside of Central activities zone for the following reasons 1) the embodied carbon associated with high rise buildings 2) the energy consumption of the higher storeys of high rise residential buildings are known to be far higher than the lower floors, 3) The blocking of the skyline view 4) Policy NE1 specifically states that the council will ‘preserve and enhance Hampstead Heath by taking into account the impact on the Heath when considering relevant planning applications including any impacts on views to and from the Heath. 5) Paragraph 11.6 goes onto describe key areas of open land within the borough, Hampstead Heath is one of four particularly important places named, it then states that Camden will protect the openness and character of these spaces. 6) Paragraph 11.17 continues to describe Hampstead Heath in detail, in particular its size and accommodation of recreation space (for all Londoners and its visitors). It states that ‘We will continue using guidance in conservation area appraisals to preserve and enhance the built environment around the Heath and preserves outlooks and views from it. We wish that a) sensible height limits are established in the plan for all of the designated zones, it is unreasonable to leave these open ended b) we wish the height limitation to be set generally at 8 storeys with discretion to be used to permit up to 12 storeys maximum to sites F, G, K L & N.	The approach to tall buildings in the Local Plan and the sites identified reflect the findings of the Camden Building Heights Study. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies. Policy D2 Tall buildings states that when assessing applications for tall buildings the Council will give particular attention to: "whether the proposal maximises energy efficiency and resource efficiency in accordance with Climate Change Policies CC3, CC4 and CC6", and "the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views".
Table of appropriate sites for Tall Buildings should include Shirley House (Camden Point) site.	The approach to tall buildings in the Local Plan and the sites identified reflect the findings of the Camden Building Heights Study. Applications for tall buildings will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
Support the identification of O2 site as a location where a tall building may be appropriate.	Support welcomed.
Tall Buildings policy is not relevant to the station development but is a factor affecting design and viability on other sites I which Network Rail hold an interest.	Comment noted.
We support this policy.	Support welcomed.
Add reference to public transport infrastructure Suggested wording ‘5. whether the proposal maximises the supply of affordable housing in accordance with Policy H4 (Affordable Housing), <u>or other public benefits such as public transport infrastructure improvements including station capacity improvements and step-free access;</u> ’	Part C.13 states that the Council will consider 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). Given this no change is considered necessary.
The Council's approach to tall buildings at draft policy D2 of the Plan is generally supported, however the criteria set out at part C should not be applied prescriptively (including	Part C of Policy D2 sets out a number of criteria that the Council will consider when assessing tall building applications. The weight attributed to various criteria in the

Main Issues	Councils Response
specifically C5, relating to delivering affordable housing in line with Policy H4). The height prescribed in the site allocation provides a useful starting point but should not be seen as an absolute cap, subject to detailed design and townscape considerations which may justify additional height.	policy will be determined by the decision taker as part of the planning application process.
Policy D2 should be amended to recognise there may be opportunities for tall buildings which deliver public benefits outside of the areas identified and listed.	The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. Applications for tall buildings will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
Welcome the definition of the Kentish Town Planning Framework area as an area suitable for tall buildings.	Figure 22 / Table 12 specifically identify site allocations C2 Regis Road and Holmes Road Depot and C3 Murphy's, rather than the Kentish Town Planning Framework Area, which covers a wider area.
Policy D2 is quoted. Unite generally supports Policy D2, noting; • Vertical developments can optimise efficient land use. • Well-designed tall buildings contribute to the cityscape. Unite recommend that a number of the locations where tall buildings may be an appropriate form of development (highlighted blue on Figure 22) are expanded to encompass Unite's existing student accommodation sites. • The map reference locations and associated policy numbers / site allocation references of interest are: - Map reference C / Policy S6 - Parcelforce and ATS Tyre Site - Map reference D / Policy S7 – St Pancras Hospital - Map reference F / Policy C2 - Regis Road and Holmes Road Depot • The Unite sites located immediately outside the boundaries of these areas are as follows: - Beaumont Court, College Grove NW, London NW1 0RW (located adjacent to Map area C) - St Pancras Way, 11 St Pancras Way, London NW1 0PT (located adjacent to Map area D) - Mary Brancker House, 54-74 Holmes Rd, London NW5 3AQ (located adjacent to Map area F)	The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
Unite recommend that tall buildings boundaries are expended: • To benefit Unite and Camden. • For efficient land use, promoting sustainability. • Reduce need for additional land acquisition. • Allowing vertical development reduces need for infrastructural upgrades, more cost effective. • To enable higher density. • Increase housing delivery.	The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
Lack of expansion to tall buildings boundaries risks new tall buildings overshadowing existing PBSA. Recommendation: The boundaries of map references C, D and F are expanded to encompass Beaumont Court, St Pancras Way and Mary Brancker House respectively.	The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
Regal suggests that Part B of Policy D2 is revised to include more flexibility to consider sites on a case by case basis, which in turn would then be required to have specific heritage and townscape testing. This reflects the approach endorsed through the London Plan, where tall buildings located outside of designated tall buildings zones should still be considered against the criteria identified in London Plan Policy D9 Part C (as supported through the High Court Judgment relating to London Borough of Hillingdon v Mayor of London [2021]). As such, to ensure the soundness of the plan, and consistency with policy, the proposed revision is sought: Policy D2 Part 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. Locations outside of designated tall building zones can also be considered, subject to compliance with the London Plan tall buildings policy and the criteria in Part C below.”	It is considered that the policy is worded sufficiently flexibly. Applications for tall buildings that come forward in Camden will be assessed against the London Plan tall buildings policy, Policy D2 (Tall Buildings) and all other relevant Local Plan policies.

Main Issues	Councils Response
Tall Buildings • Building Heights Study (evidence base) noted Hawkridge House as within a suitable area. • Query the exclusion of Hawkridge House from suitable areas for tall buildings? • Exclusion is unjustified. Plan should be reconsidered to allow for inclusion.	The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. The Camden Building Heights Study notes that the existing tall building on the site is 44.9 m. Site allocation C13 adjacent is identified as a location where a tall building may be an appropriate form of development, with 12 - 40m considered the potentially appropriate height range. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
The approach to appropriate building heights should be based upon recent permissions, not the borough wide building heights assessment, and appropriate heights should be a guideline rather than a fixed cap.	Comments noted. The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.
There are a number of viewing corridors which run through LBC that should be taken into consideration when planning for tall buildings. It is recommended that the LVMF view corridors are included within the Policies Map and local plan. When considering tall buildings in the locations affected by the views, the guidance in the London View Management Framework and Policy HC3 of LP2021 should be taken into consideration.	The LVMF view corridors are included on the Policies Map. The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. This took into account the guidance in the London Plan and the LVMF. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies. Part C.9 states that when considering an application for a tall building the Council will give particular attention to - the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views.
Recommended that appropriate heights are included within Figure 22 or Table 12 of the Plan, to provide clarity on what heights may be acceptable in the identified locations.	Table 12 of the Plan sets out the locations where tall buildings may be an appropriate form of development. It supports the map set out in Figure 22. Guidance on building heights for specific sites is then set out in the relevant site allocation policies. Given this, it is not considered necessary to also include this information in Table 12.
Reasonable for the 40m height threshold to be defined by the south Camden boundary rather than the CAZ boundary. Consider that there should be more reference to, and support for, high-density development across the whole of the borough.	Policy DS1 Part A.3 supports development optimising the use of land and making best use of a site. It states that the Council will resist development that makes inefficient use of Camden's limited land.
Building heights on key sites like Euston must reflect a scale that generates value. Consider that any stated thresholds for tall buildings within Policy D2 should be indicative.	The tall building thresholds define what is considered to be a tall building in Camden; they do not indicate appropriate building heights. The emerging updated 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.
Policy D2 should avoid prematurely constraining development. Appropriate building heights should be arrived at through testing and analysis at planning application stage.	Policy D2 sets out matters that the Council will consider when assessing planning applications for tall building. This is consistent with the approach in the London Plan. The emerging updated Euston Area Plan sets out the detailed policy approach to tall buildings in the designated Euston area and identifies locations where tall buildings may be an appropriate form of development.
Ask that the policy acknowledges that major station and public transport nodes, such as Euston, benefiting from nationally important transport infrastructure, are best placed to achieve the greatest height and density. This is recognised in London Plan Policy GG2.	The emerging updated 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.
We request the following specific adjustments are made to the policy text: “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. <u>The exact appropriate building heights will be determined at planning application stage. Major station and public transport nodes are the locations best placed to achieve the greatest height and density.</u> Guidance on building heights for specific sites is set out in relevant site allocation policies.”	The approach to tall buildings in the Local Plan and the sites identified reflect the findings of the Camden Building Heights Study. The Plan already states that 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 (in relevant site allocations). The acceptability of a tall building at a particular station or transport node should be assessed against relevant policies; they will not necessarily be appropriate for greater height. No change to wording is therefore considered necessary.

Main Issues	Councils Response
The assessment of tall buildings within the Euston Area should take place through the Euston Area Plan rather than through the Local Plan.	The emerging updated 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 have regard to the Euston Area Plan, as well as the Local Plan.
Would like to suggest a further minor change to part 8 of Policy D2 so that it specifically includes reference to heritage assets in neighbouring boroughs: " the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets (including in neighbouring boroughs where impacted) in accordance with Policy D5 (Historic Environment)."	We will propose a modification to address this.
Barnet's is mindful that Camden's need to deliver housing to meet its 5-year housing supply targets could compete with the need for proposals to "consider" local views when assessing suitability for tall buildings in many of the site allocation sites.	Comment noted.

Policy D3 – Design of housing

Number of representations: approx. 8

Representations received from:

- Redington and Frognal Neighbourhood Forum
- Riverside and Country Partnership
- Land Sec
- Kings Cross Central Limited Partnership
- St George West London
- Highgate Society
- Highgate Conservation Area Advisory Committee

Main Issues	Councils Response
Suggest amendment to Policy D3 A12 to read "Seek the delivery of biodiversity enhancements in line with Policy NE2, including the incorporation of features of value as wildlife habitat, e.g. eaves and bird bricks."	Policy NE2 sets out the Council's approach to securing biodiversity, including the provision of wildlife measures. The Plan should be read as a whole. No additional wording is considered necessary.
A direct reference to Supplementary Guidance in planning policy D3 elevates the guidance to a status it should not have. This is not how the GLA applies their Housing Design Standards LPG. Reference to the Supplementary Planning Guidance should be removed from part A (1).	Policy D3 states that applicants should have regard to supplementary planning guidance issued by the Mayor and the Council. This is not considered to be unreasonable. No change to wording is considered necessary.
Policy D3: Design of Housing. Design is not actually mentioned but depends on Planning Guidance. This is too open-ended.	The policy sets out a number of criteria to guide the design of housing in Camden, with more detailed guidance set out in the Council's supplementary planning guidance on design.
Suggest clear guidance on extensions are required such as: • From a position on the centre line of the boundary and at right angles to the boundary, could the proposed extension be seen? if not then the proposal would be a rear extension. There may be other situations when similar clarity is required.	The Local Plan sets out the Council's overarching approach to protecting amenity, with further guidance provided in supplementary planning guidance. The concerns raised are matters that would be considered as part of the planning application process. No change to wording is therefore considered necessary.
Policy D3 A. Our comments above regarding the definition of "high quality" apply both here and elsewhere. This must be judged by an independent Design Panel, but that panel must be able to see the reactions of community consultees before making its recommendation.	Comment noted.
Support the aspiration for all homes to be dual aspect, but many high-quality developments do contain some single aspect homes, and these can provide a high-quality living environment. A small proportion of single aspect homes may be necessary of large sites to address specific on-site design considerations, or in order to optimise site capacity. This approach is supported by GLA's accelerating housing delivery practice note (2024). Suggested wording change: "The Council will expect all support and encourage new homes to be dual aspect whilst ensuring site optimisation"	It is considered that the policy is worded sufficiently flexibly and no change is therefore considered necessary.

Policy D3 should provide flexibility for single aspect homes in accordance with the 2023 Housing Design Standards London Plan Guidance.	It is considered that the wording of the policy affords the decision maker sufficient flexibility when considering a scheme. No change to wording is therefore considered necessary.
Paragraph 9.2 of the GLA's Accelerating Housing Delivery Planning and Housing Practice Note states that the Housing Design Standards London Plan Guidance should not be applied mechanistically in a way that inhibits delivery. Paragraph 9.3 goes onto emphasise that standard C4.1 sets out the intention that new homes should aim to be dual aspect while recognising that the appropriate and efficient design solution may involve some single aspect units. While the amount of single aspect units should be kept to a minimum, this will vary according to the specifics of each site, the design rationale for their use and the impact on key objectives. Amend policy to read - A1. expect housing development to meet be designed with regard to 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; A3. expect all new homes to be dual aspect;	It is considered that the wording is appropriate and provides sufficient flexibility. No change to wording is therefore considered necessary.

Policy D4 - Extensions and alterations to existing buildings

Number of representations: approx. 8

Representations received from:

- Primrose Hill Conservation Area Advisory Committee
- Redington and Frognal Neighbourhood Forum
- Camden YIMBY
- Kentish Town Neighbourhood Forum
- Highgate Society
- Belsize Conservation Area Advisory Committee
- Belsize Society

Main Issues	Councils Response
Suggest amendment to paragraph 12.70 - the "significance of a designated or non-designated heritage asset and its setting will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset and its setting."	The wording in the Local Plan aligns with the approach to set out in the NPPF. No change to wording is considered necessary. Policy D5 Historic Environment sets out the Council's approach to non-designated heritage assets.
Paragraphs 12.65 and 12.68 are welcomed.	Support welcomed.
KTNF notes an increasing amount of householder applications for extensions – and this cumulatively reduces green space. In some cases, the land may not be available to offset biodiversity loss, and a mechanism should be sought, so that householders can input into an offset scheme. Extensions also add to run-off, reduce the capacity of the earth to absorb water and flooding considerations should be included in this section.	Comment noted.
NPPF Paragraph(s) Breached 125e. Amend wording to encourage well-designed upward & outward extensions; align with Lambeth or Tower Hamlets.	Policy D4 Extensions and alterations to existing buildings states that the Council will support applications for extensions and alterations to existing buildings to deliver additional residential floorspace and / or additional homes and sets out a number of criteria against which planning applications should be determined.
Para 12.69: Add "Dormer windows and roof lights in front roof slopes and excessively large dormers to side slopes will be resisted.	Policy D4 Extensions and alterations to existing buildings states that the Council will support applications for extensions and alterations to existing buildings to deliver additional residential floorspace and / or additional homes where the stated criteria are met. It is considered that the proposed wording is overly restrictive.
Policy D.4 A. In view of the urgent need for new housing units, we suggest a fourth proviso: "4. In view of the urgent need for additional housing units, priority will be given to the provision of these over and above extensions to single units."	Policy D4 Extensions and alterations to existing buildings states that the Council will support applications for extensions and alterations to existing buildings to deliver additional residential floorspace and / or additional homes and sets out a number of criteria against which planning applications should be determined against. Other policies in the Plan set out the Council's approach to maximising the supply of new homes in Camden. No additional wording is considered necessary.

12.71. Add: “and any adverse visual impact on the terrace, or on the wider streetscape.”	The impact of a proposal will be considered against all relevant policies including D1 on Design and D5 on Heritage. No additional wording is considered necessary.
Where roof extensions are permitted, attention should be given to maintaining the historical roofscape, avoiding squaring everything off and maintaining gables, eaves, pediments, ridge-tiles, decorative features and chimneys and so on that are a feature of many of our streets. Too many roof extensions are disproportionate and do not respect the host building. Policy should state that a proper survey with good photographs of the existing and neighbouring structures be carried out paying attention to the characteristic visual features which need protection and/or restoration as a condition of planning consent. Better understanding and clarification of the effect of any intervention needs demonstrating	Policy D4 expects applications for extensions to be designed and constructed to respect and complement the main building and wider townscape. Roof extensions should not adversely impact on designated heritage assets or their setting, and should be consistent with the prevailing form of neighbouring properties and the overall street scene. Applications for roof extensions will be assessed against Policy D4 and all relevant Plan policies, including Policy DS1 and Policy D5, which set out requirements relating to Design and Access Statements and Heritage Statements. Not all roof extensions will require planning permission; with some being undertaken under permitted development rights.

Policy D5 – Historic environment

Number of representations: approx. 29

Representations received from:

- Primrose Hill Conservation Area Advisory Committee
- Redington and Frognal Neighbourhood Forum
- UCL
- Regal
- Highgate Society
- Highgate Conservation Area Advisory Committee
- Resident

Main Issues	Councils Response
Suggest Policy D5 G is amended to read "Sustainability improvements to designated and non-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. Add: This can include the provision of living roofs and species features such as bird and bat boxes, eaves and bird bricks and new biodiverse planting. However, living roofs alone are not sufficient mitigation for loss of soft natural surface and/or trees and shrubs and other vegetation of value to wildlife.	The wording in the Local Plan aligns with the approach to set out in the NPPF. No change to wording is considered necessary. The suggested text is covered by Policy NE2 Biodiversity.
Strongly support Policy D5 and welcome the addition of optimum D5.D2.	Support welcomed.
Welcome additional policy D5 E.	Support welcomed.
Welcome additional policy F5G, H, I, J. Suggest amendment to include a Sustainability Statement in J. Please add the missing letter in 'Sust[a]inability'.	Policy CC1 Responding to the climate emergency sets out where a sustainability statement will be required. No change to D5 is considered necessary. We will propose a modification to correct the missing letter.
Support Policy D5 K, L.	Support welcomed.
Support strengthened Policy D5 M2 and M4.	Support welcomed.
Welcome Policy D5 S.	Support welcomed.
Strongly support paragraphs 12.77 - 12.78.	Support welcomed.
Suggest the first sentence of paragraph 12.85 is amended to read "When assessing planning applications for development within conservation areas the Council will pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas, as set out at Policy D5 (Historic Environment), while also seeking to achieve other priorities and to deliver wider public benefits".	Para 12.85 is supporting text to policy D5. It is considered that the wording used is appropriate and no change is proposed.

Main Issues	Councils Response
Suggest the second sentence of paragraph 12.85 is amended to read "The Council is committed (see 12.77) to updating Conservation Area Strategies and has issued 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.".	Decisions to update conservation area strategies and Camden Planning Guidance are made separate to the Local Plan and the suggested wording is not therefore considered to be necessary or appropriate.
Welcome and support paragraph 12.87	Support welcomed.
Welcome paragraphs 12.92, 12.93, 12.94, 12.95 -99.	Support welcomed.
Welcome paragraph 12.109.	Support welcomed.
Suggest amendment to policy D5 to include an additional clause "Camden has a rich heritage of street furniture, including Listed lamp-standards, post boxes, telephone boxes, York stone paving, granite kerbs, granite setts, and cast-iron coal-hole covers. Meritorious in themselves they also provide a setting for other heritage assets and should be protected and preserved by service providers and others.".	It is considered that this is already dealt with by the policy. No additional wording is therefore considered necessary.
Welcome Policy D5 D and E.	Support welcomed.
Suggest caution to Policy D5 E "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will weigh that harm against the public benefits of the proposal, giving significant weight to measures that respond to the climate emergency in a sensitive manner." Uneasy to the point of objecting to most of this section.	It is considered that the policy D5 aligns with the NPPF. No change to wording is therefore considered necessary.
The highlighted wording is unacceptable Policy D5 G. The Council will: i. Require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;	It is considered that the wording in Policy D5 aligns with the NPPF. No change to wording is therefore considered necessary.
Pleased with the retention of clauses: ii. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area; iii. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and iv. 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.	Support welcomed.
Important that applications for sustainability improvements in Conservation Areas and to all heritage assets must be accompanied with as existing and as proposed details of windows, doors, eaves, ridges, chimneys, etc. at 1:5 scale in addition to the requirements proposed.	Comment noted.
There is some confusion and possible duplication between Camden's Local List and the street-by-street summary of character which are also very useful documents.	Comment noted.
Policy D5 does not comply with the Climate Change Act. Camden should prioritise retro-fitting insulation, and other energy measures, above historic Conservation.	Policy D5 states that the Council will support proposals to adapt and improve the energy performance of heritage assets. The approach is considered consistent with national policy and legislation.
Policy D5 -The Historic Environment We generally strongly support this policy.	Support welcomed.
M. Listed Buildings. The current list of heritage assets is not a fixed one. Add a fifth point: "5. take the opportunity to add buildings or other heritage assets to the Statutory or Local List when such steps can be taken."	The Council's website states that the local list will be reviewed and updated from time to time. This can happen outside of the Local Plan. We propose to include further detail on this when we update our Camden Planning Guidance on the Historic Environment.
Paragraph 12.77 suggest that this is strengthened to ensure that current unrecorded heritage is looked for and taken account of as a part of the overall development process and that, particularly in the case of older buildings, the possible presence of hidden earlier structures should be given due weight when formulating proposals.	This is not a matter for the Local Plan.

Main Issues	Councils Response
We strongly support this policy, which we trust will not be weakened. 12.103 on the likelihood of unknown archaeological sites occurring even in Tier 3 and 4 areas, is particularly important. It could be made clearer that this is likely because patterns of earlier settlement, particularly of the prehistoric, Roman and Saxon periods, often do not relate to the known later pattern of settlement, and that therefore such sites can be expected anywhere.	Support welcomed
We would therefore ask that there should be a requirement for heritage and archaeological consultants to liaise with relevant local heritage and community groups as a part of their assessment of a site.	Comments noted. We propose to include further detail on this when we update our Camden Planning Guidance on the Historic Environment.
Concern for soundness of Policy D5. As such, to ensure the soundness of the plan, and consistency with the NPPF, the proposed revision is sought: Policy D5 Part L – “resist development outside of a conservation area that causes harm to the character, appearance, and/or setting of the conservation area unless it is demonstrated that the scheme delivers public benefits that outweigh the perceived harm”.	The Council considers that as worded Policy D5 accords with the NPPF. No change to wording is therefore considered necessary.
• The revised wording in draft Policy D5 on ‘Sustainability improvements to designated heritage assets’ is welcomed. • However, as mentioned in previous representations, the provision of clearer guidance on the type of sustainability measures that may be considered appropriate would be beneficial, • Although noting that each heritage asset would have to be assessed on a case-by-case basis in terms of significance and perceived harm from proposed.	The supporting text to the policy sets out a number of measures that can be applied to traditionally built historic buildings to improve their sustainability. No change is therefore considered necessary.

Policy D6 - Basements

Number of representations: approx. 49

Representations received from:

- The Heath and Hampstead Society
- Hampstead Neighbourhood Forum
- Redington Frognal Neighbourhood Forum
- Belsize Conservation Area Committee
- Primrose Hill Conservation Area Advisory Committee
- Patterson Construction
- Basement Design Studio
- Shire Structures Ltd
- Underpin and Makegood Contracting
- Newton Waterproofing Systems
- ASUC
- Falcon structural Repairs
- BH Basements
- Structural Repairs and Specialist Services
- Noble Structures
- MJ Rooney Construction
- D3 Projects
- A squared Studio Engineers
- Basement Force
- Knowles Construction
- Sherlock London
- Helium Engineering
- Own London Projects Ltd
- Property Care Association
- Pile Designs Ltd
- DNA Architecture
- Transport for London
- Seacon
- Walton Wagner
- Burke Hunter Adams LLP
- Vincent and Rymill
- Belsize Society

Main Issues	Councils Response
We note that the policy requires developments to demonstrate that any basement development would not cause harm to neighbouring properties. This should also include London Underground infrastructure.	Agree that clarification in A (1), that it is intended to include infrastructure such as the Underground, would be helpful.
Welcome Camden's strengthened approach to basement development controls in the Local Plan Draft 2025, particularly the intention to prevent building under gardens. The phrase 'not exceed the footprint' is ambiguous and could be interpreted as allowing basements to spread beyond the building's perimeter, provided the total area does not surpass the building footprint. Evidence from London Wildlife Trust, GLA, Defra and several London boroughs demonstrates that basement construction under gardens causes permanent loss of wildlife habitat and ecological corridors, damage to mature trees/ their roots and reduced soil permeability and flood risk. The cumulative environmental impact erodes the Borough's green infrastructure, undermining its resilience to climate change and ability to provide ecosystem services.	We agree that the wording "in area" should be removed for clarity as this will avoid any confusion about how the policy is intended to be applied.
Generally support D6. Policy places an unduly restrictive emphasis on basement development compared to other forms of construction, such as single-storey above-ground extensions or loft extensions. Risks can be managed through appropriate design and mitigation and potential impacts on groundwater and local flood risk can be effectively managed through adherence to recognised industry standards. Limiting basement extensions to within the footprint of the original building appears unnecessarily restrictive, particularly when above ground extensions are frequently permitted beyond the original building envelope. Basement development can preserve more garden and amenity space than above ground alternatives. Extending basements under parts of the garden or side return can often be delivered responsibly without adverse impacts. Both above ground and basement development involve similar levels of structural work, plant use, noise and material deliveries. With effective site management and communication, disruption from basement works can be no greater, and in some cases less, than comparable above-ground construction. Proposals should be evaluated on their merits rather than through blanket restrictions.	Basement development can have greater impacts than other domestic development. It can change ground and water conditions, potentially leading 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 through its basement policy. Policy D6 in the Submission Draft Local Plan largely continues the approach in policy A5 in the current Plan, which was found sound at public examination, and policy D6 is also considered to set out a sound approach. Although the Council considers that adopted policy A5 is operating effectively, it is considered appropriate to make amendments to increase the effectiveness of the Local Plan's basement policy in protecting the environment and neighbours. The impact of basement development can be greater for larger schemes. Camden has a sizable number of large residential properties where a basement extending to 50% of the garden, as provided for in the current policy, would be a substantial size and cover a significant area beneath the garden, and therefore have a potentially greater impact on ground and water conditions. Also, these large gardens often have particular biodiversity importance and mature gardens contribute significantly to the character of a number of the borough's conservation areas. Residents and community groups have raised concerns about the cumulative losses of gardens from basement development across a neighbourhood and the significant impacts arising from subterranean development within often large gardens, which will often form part of a local ecological network. While some restoration can occur on completion, it is likely that replacement planting will have significantly less biodiversity value than the former mature area of garden, and affected wildlife habitat and ecological corridors are permanently lost. Basements are also associated with high embodied carbon expenditure due to their reliance on materials such as reinforced concrete. Basement extensions generally have a significantly higher embodied carbon footprint compared to above-ground extensions due to the materials and construction methods required. Basement construction also involves extensive excavation, adding to carbon emissions through fuel use and soil removal, which is exacerbated in larger basement schemes. The life cycle carbon analysis of extensions and subterranean developments (Eight Associates report) suggests single storey basements can be around 55% more carbon intensive than comparable above ground extensions. Further information on our approach is set out in the Council's basements topic paper.

Main Issues	Councils Response
Support the representation submitted by ASUC. The restrictions in the draft policy would have a significant negative impact on our business resulting in job losses. ASUC rep should be given full weight bearing in mind impact on my business, other businesses and broader economy.	Basement development can have greater impacts than other domestic development. It can change ground and water conditions, potentially leading 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 through its basement policy. Policy D6 in the Submission Draft Local Plan largely continues the approach in policy A5 in the current Plan, which was found sound at public examination, and policy D6 is also considered to set out a sound approach. Although the Council considers that adopted policy A5 is operating effectively, it is considered appropriate to make amendments to increase the effectiveness of the Local Plan's basement policy in protecting the environment and neighbours. The impact of basement development can be greater for larger schemes. Camden has a sizable number of large residential properties where a basement extending to 50% of the garden, as provided for in the current policy, would be a substantial size and cover a significant area beneath the garden, and therefore have a potentially greater impact on ground and water conditions. Also, these large gardens often have particular biodiversity importance and mature gardens contribute significantly to the character of a number of the borough's conservation areas. Residents and community groups have raised concerns about the cumulative losses of gardens from basement development across a neighbourhood and the significant impacts arising from subterranean development within often large gardens, which will often form part of a local ecological network. While some restoration can occur on completion, it is likely that replacement planting will have significantly less biodiversity value than the former mature area of garden, and affected wildlife habitat and ecological corridors are permanently lost. Basements are also associated with high embodied carbon expenditure due to their reliance on materials such as reinforced concrete. Basement extensions generally have a significantly higher embodied carbon footprint compared to above-ground extensions due to the materials and construction methods required. Basement construction also involves extensive excavation, adding to carbon emissions through fuel use and soil removal, which is exacerbated in larger basement schemes. The life cycle carbon analysis of extensions and subterranean developments (Eight Associates report) suggests single storey basements can be around 55% more carbon intensive than comparable above ground extensions. Further information on our approach is set out in the Council's basements topic paper.
Generally supportive of the proposed plan and policies. There are notably useful aspects give the problems with basement development prior to the 2017 Plan. Significant flaws in the limitation around the siting, location, scale and design of basements: - they are arbitrary. - not supported by proper/ proportionate evidence. - imposed in defiance of logic. - will impose greater burdens on developers of basements than developers of above ground development without good reason. - ignores the opportunity to positively prepare policy. Limitation on basements to single storey also unsound for same reasons as above. Ask that the Council's confirmation that carbon reporting is not being used to limit basement development is noted. Garden basements could justifiably require improvements over the pre-development situation in matters including green/garden spaces, biodiversity and in most cases, drainage and surface run off.	Basement development can have greater impacts than other domestic development. It can change ground and water conditions, potentially leading 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 through its basement policy. Policy D6 in the Submission Draft Local Plan largely continues the approach in policy A5 in the current Plan, which was found sound at public examination, and policy D6 is also considered to set out a sound approach. Although the Council considers that adopted policy A5 is operating effectively, it is considered appropriate to make amendments to increase the effectiveness of the Local Plan's basement policy in protecting the environment and neighbours. The impact of basement development can be greater for larger schemes. Camden has a sizable number of large residential properties where a basement extending to 50% of the garden, as provided for in the current policy, would be a substantial size and cover a significant area beneath

Main Issues	Councils Response
The 1m of soil already required over the roof of a garden basement allows the healthy planting and growth of a tree of any size. A Biodiversity Net Gain Plan can go hand-in-hand with a landscaping plan. An improvement over the existing condition can be achieved through SuDS/ enhanced SuDS A positively prepared policy would realise positive benefits. * In 2016, ASUC published the HSE endorsed document 'ASUC guidelines on safe and efficient basement construction directly below or near to existing structures which the Council could use to promote safe and efficient basement development. * All members of ASUC are expected to have high standards of health and safety, quality of work and consideration for local residents. They are subject to third party audit and must demonstrate financial strength and insurance cover. * Council has not stated any areas of A5 that are not effective nor produced any evidence * Fully supportive of BIA and CMP processes as they are likely to make it difficult for poor quality contractors to be able to work in the Borough. * Local Plan goes well beyond London Plan basement policy D10 which states that boroughs should address the "negative impacts of large-scale basement development" * Supportive of the overall intention of the policy to promote 'good' basement development while preventing harmful basement development. * Not necessary to limit a new access to a lightwell ner to the boundary of a neighbouring property Suggest following changes: * Replace D6(3) with 'Not exceed 50% of the area of each garden within the property' * Add requirements for basements extending beyond the footprint of the host building to: - provide an acceptable landscaping and planting plan. - require a natural/bucolic appearance and take the opportunity to increase tree/natural planting - have no net loss of biodiversity or a gain insofar as it is proportionate. * Replace D6 C (11) with: 'ensure that any new access or lightwell does not cause unacceptable harm to neighbouring properties or to the street scene'. In A: "where it is demonstrated to its satisfaction" - it should not be down to the Council's potentially arbitrary opinion. "would not cause harm" - this is an absolute requirement meaning that any harm, no matter how small could lead to permission not being granted. Replace with: 'would not cause material harm' B: support, these are important safeguards. C: (1), (2) and (5) do not object to these at this time but ask that it is recorded that these restrictions are not necessary for the policy to be effective. * The concerns the Council addresses at para. 12.131 can all be addressed by good design and/or appropriate planning conditions. Flooding. * A garden basement is not at a greater risk of being flooded than a basement under the host building. Protection in both cases should be provided by positive pumped devices as is already a requirement of Camden's CPG. * The Arup Study never stated/suggested that garden basements should not be allowed on the basis of flooding or any other geological, hydrogeological or hydrological matter. * The Council's survey of basement development had 496 responses, 5 responses raise problems of drainage in neighbouring gardens. The complaints if valid suggest a failure in the BIA process. The complaints were from permissions granted before the adoption of A5 and its enhanced BIA.	the garden, and therefore have a potentially greater impact on ground and water conditions. Also, these large gardens often have particular biodiversity importance and mature gardens contribute significantly to the character of a number of the borough's conservation areas. Residents and community groups have raised concerns about the cumulative losses of gardens from basement development across a neighbourhood and the significant impacts arising from subterranean development within often large gardens, which will often form part of a local ecological network. While some restoration can occur on completion, it is likely that replacement planting will have significantly less biodiversity value than the former mature area of garden, and affected wildlife habitat and ecological corridors are permanently lost. Basements are also associated with high embodied carbon expenditure due to their reliance on materials such as reinforced concrete. Basement extensions generally have a significantly higher embodied carbon footprint compared to above-ground extensions due to the materials and construction methods required. Basement construction also involves extensive excavation, adding to carbon emissions through fuel use and soil removal, which is exacerbated in larger basement schemes. The life cycle carbon analysis of extensions and subterranean developments (Eight Associates report) suggests single storey basements can be around 55% more carbon intensive than comparable above ground extensions. Further information on our approach is set out in the Council's basements topic paper.

Main Issues	Councils Response
Ground instability. * The Arup Study makes no reference to an increased risk of ground instability with respect to garden basements. The risks are effectively managed through the BIA. * The Council has not stated that damage to neighbouring properties has been a problem since the adoption of A5. * Garden basements have not been more of a problem/ risk to neighbouring properties than basements underneath buildings. Character and amenity. * 9 of the 614 responses to the Council's survey related to the character and amenity of gardens once works had been completed. The matters raised could have been dealt with by good design through a positively proposed policy and use of effective planning conditions. Policy. * Policy A5 already adequately addresses matters regarding the character and amenity of the area. The Council retains the ability via its planning policy and guidance to influence the appearance and character of any development. Planting and landscaping. * Planting in garden areas will usually mature in the years following development. * The policy could/should go further not only to protect trees but enhance gardens through BNGs and mature planting. * The CPG on basements already includes detailed advice relating to trees, landscaping and biodiversity. * Any major tree grown in the UK can be planted and thrive on top of a basement development. It can reach maturity and live a normal lifespan in 600mm of soil. * The landscaping design does not need to be artificially flat or manicured. * Planning conditions can ensure high quality gardens and good tree cover. * It is feasible to improve on the existing condition, e.g. gardens with hard paving and limited/no planting. * Surface water can be directed away from going directly into the public drainage system Impact of construction on neighbours. * The Council has not provided proportionate supporting evidence to demonstrate that garden basement development is the cause of negative construction impact on neighbouring properties nor shown that the impact is greater than for basement development under buildings. * There are 3 of 614 responses relating to construction impacts of basement developments that extend beyond the footprint of the host building. Only one of these requests that basement development beyond the footprint of the host building is curtailed. * There was only one response to the 2024 Draft Local Plan consultation concerning the size of basements and construction impact. * Existing protections such as construction hours if applied and enforced are capable of protecting the amenity of neighbours. * Camden's CPG includes various controls such as registration with the CCS, construction and demolition processes to conform to the ICE Demolition Protocol, sites to work in accordance with the Council's 'Guide for Contractors' and the need for an acceptable CMP to be submitted. This set of controls were not in place in the period when applications covered by the survey were granted planning permission. * The Council could improve on the existing situation by allowing no noisy works on Saturday mornings and limiting high impact construction works and construction traffic movements to certain times. Setting lightwells/access back from boundary. * There is no justification in the Draft Local Plan or any other documentation.	

Main Issues	Councils Response
* Whilst this appears in A5, it serves to prevent development that does not cause harm for no good reason and should be reviewed and omitted. C (1) to C (5) - support these exemptions as essentially developments will need to be assessed on a case-by-case basis. Such exemptions should apply to all development which can demonstrate it does not cause material harm. Support E (1) - (2) and E (4) - (8). While the Council has concentrated on embodied carbon during construction, the more correct measure is Whole Life Cycle- an industry accepted norm. * Only 1.55% of all concrete used in Greater London is used for constructing basements. This is a relatively small percentage and does not support the amount of effort the Council is dedicating to monitoring and recording. Generally support the approach to listed buildings / heritage assets. On some occasions some harm is necessary to secure the optimum viable use of a listed building. Suggest replacing first line of text in 12.141 "where they do not cause harm to the significance of a listed building or its garden" with 'where they accord with national policy on development affecting designated heritage assets.' 12.142-12.144 is negatively written - the presence of basements and lightwells in the existing streetscape should not be a prerequisite for development. Rather, good design and avoidance of harm should be the basis for development being approved. Replace 12.142 with 'Lightwells should not cause material harm to the character or appearance of the area. Lightwells, rooflights, plant, railings and means of escape are examples of features which need particular care.' Delete 12.143 and delete the first sentence of 12.144. Security for expenses and party wall agreements are dealt with under separate law and regulations and should not be included as a requirement. It is not therefore for the Council to expect these matters to be dealt with.	
The Society are very supportive of the objective of restricting basements to underneath an existing building. "Footprint" is insufficiently clear - should be defined or changed to "all basement construction should be restricted to underneath the existing building only".	We consider the wording is sufficiently clear - the intention of the approach is to maintain areas of garden space.
ARUP's 'Camden geological, hydrogeological and hydrological study' 2010 should be updated. Lack of an up-to-date description of Camden's complex geology or up-to-date maps. Lack of reference to 'superficial deposits' capable of carrying groundwater which can undergo significant storm surges and are highly erodible. They are potentially responsible for subsidence and landslides. Lack of reference to bands of the London Clay Formation. Insufficient description of the role of groundwater in contributing to groundwater flooding and sewer surcharge downstream of basement development Insufficient acknowledgement of local hydrogeological impact and ground pressure changes. Appropriate borehole drilling and tests should be used to establish risk. Computational stability analysis methods must be used appropriate for the complexity of the local hydrogeology. Data entered into stability analyses must not break the conditions/ rules of the method used.	The detail raised in the response goes beyond what is appropriate in the Local Plan. They relate to specific elements of the BIA process and how information and data is collected. We will take these comments into account when Camden's Planning Guidance on Basements is reviewed. Basement Impact Assessments are a well established means for ensuring that basement applications are assessed, and BIAs audited through a consistent approach and in line with the Council's policy and guidance on basements.
Welcome that the Council has included much stronger wording to reduce impacts of basement building on gardens. Commend the Council for attempting to establish the consequences of basement development and for publishing the Basement Evidence Report 2016.	Support welcomed.
The Basements Survey did not take account of Building Control, the views of Party Wall Surveyors or local groups and did not consider the long-term consequences of (barriers to) groundwater entering the sewer system or ongoing ground movement.	The Basements survey was intended to understand residents' experiences of basements that had been implemented. Building Control, Party Wall surveyors and local groups have had opportunities to comment on emerging Local Plan policies and our basements planning guidance.

Main Issues	Councils Response
Quite rightly the Local Plan requires evidence that only up to Burland Scale category 1 is achievable in the BIA but this is not the experience of many neighbours. We know that unacceptable damage will still occur to some neighbouring buildings. Updating of the guidance that relates to its is urgently needed.	We consider that the Council's approach is effective. The Council will consider the need to update Camden Planning Guidance documents following the adoption of the new Local Plan.
There is a lack of an informed understanding of the hydrogeology of Camden - this is resulting in significant incidence of leaking water mains pipes and sewers and the frequent appearance of roadway potholes and sink holes.	Thames Water are a statutory consultee on the Local Plan and their comments have been incorporated into the policy. The BIA process requires the submission hydrological reports where appropriate and these must be prepared by independent professionals with appropriate qualifications.
Comments on the Arup Study: It was well-written for its time. The figures in the document are inadequate for illustrating the geological and hydrogeological features that have an impact in Camden. The 1:10,560 Geological Map 1920 was the most useful map for illustrating most of the courses of the lost rivers in Camden and their tributaries. During storms the tributaries assert their presence and much water follows the outside of conduits/sewers eroding ground-based silt and trench fill. Figures 3,4 and 5 should refer to the most appropriate band of the 'London Clay Formation' indicating the degree of silt and sand partings that band contains. There is no mention of superficial deposits. The 1:50,000 BGS map 'North London Bedrock and Superficial deposits' is better.	These are matters for Camden's BIA methodology / Camden Planning Guidance on Basements rather than the Local Plan. We will take these comments into account when the planning guidance is reviewed. The Council will consider the need to update Camden Planning Guidance documents following the adoption of the new Local Plan.
Figure 8 'Camden Aquifer Designation Map' of the Arup Study is even more unhelpful. Developers rely on this map for their argument that there is no groundwater likely to be present and testing across storms is not required or enforced despite evidence of past river presence and silt erosion. Figure 21 on watercourses is an all London map published in 1962 and is not necessarily accurate. On Figure 17 it is impossible to determine whether a particular building or road is in the 'areas of greatest potential for slope instability'.	These are matters for Camden's BIA methodology / Camden Planning Guidance on Basements rather than the Local Plan. We will take these comments into account when the planning guidance is reviewed. The Council will consider the need to update Camden Planning Guidance documents following the adoption of the new Local Plan.
Arup study - There is no indication that there are permeable and erodible superficial deposits that are laid in a very complex manner. These are affected by digging out on even gentle slopes particularly when ground movement is encouraged by groundwater passing through/within sand partings in the bedrock soils below. Groundwater surging during storms can erode considerable amounts of silt from the ground - from the made ground, the superficial deposits and the silt and sometimes sand partings from within the clays beneath. It would be better to use the more recent (2006) BGS map of bedrock and superficial deposits to illustrate the geology and accompanied by reference to Ellison et al (2004).	These are matters for Camden's BIA methodology / Camden Planning Guidance on Basements rather than the Local Plan. We will take these comments into account when the planning guidance is reviewed. The Council will consider the need to update Camden Planning Guidance documents following the adoption of the new Local Plan.
In the revised Hampstead Neighbourhood Plan, rather than referring to Arup's Figure 17, we have overlain a map of part of the BGS map of bedrock and superficial deposits - which also includes roads from the OS map. The Council can be commended for passing this, along with the examiner.	Support welcomed. The revised neighbourhood plan now forms part of the development plan and will be taken into account when planning applications are being assessed in this area.
Arup study - section 2.7 only refers to clay and not to superficial quaternary deposits. In Hampstead, we have found 8 major landslips prompted by basement digging along the north side of Finchley Road and building subsidence timed with basement digging out or storm surges of groundwater. Oasys analyses are not dynamic. They don't cater for vibrations from construction, landslides that are creeping as a result of excavation and consolidation of pure water pressures. They are constrained by settlement curves and ground reactions that have been determined from site experience. The site being analysed should be identical, or at least significantly similar, to that which the empirical data constraining the analysis has come from.	These are matters for Camden's BIA methodology / Camden Planning Guidance on Basements rather than the Local Plan. We will take these comments into account when the planning guidance is reviewed. The Council will consider the need to update Camden Planning Guidance documents following the adoption of the new Local Plan. Under paragraph 12.137, basements that would reduce the permeable surface on a site are required to provide a Sustainable Drainage System to mitigate any harm to the water environment: this includes downhill / downstream from where a new basement is being constructed.

Main Issues	Councils Response
Camden should require a clear demonstration for non-technical readers of how input data has been calculated and used in a computational stability analysis. The Local Plan/ BIA needs to consider not only immediate neighbours but the impact of ground movement and flooding downhill and downstream. This needs to be tested across adequately severe storms. We see the wrong method of drilling and sample recovery used when testing for groundwater allowing the natural barriers between the layers to be disrupted so that it becomes impossible to determine the depth at which groundwater occur. We frequently see disturbed soil samples used where undisturbed samples are required for certain tests. The wrong data can be entered for soil type into Oasys calculations based on the wrong assumptions. InSAR is much more accurate than Copernicus and an historical X-band InSAR survey should be considered for all of Camden.	
Some simple adjustments to the Local Plan's wording on basements would produce a large difference in outcomes for basement development neighbours and would support the flood actions set out in the SFRA Stage 1. The Arup Study should be updated.	The detail raised in the response goes beyond what is appropriate in the Local Plan. They relate to specific elements of the BIA process and how information and data is collected. We will take these comments into account when Camden's Planning Guidance on Basements is reviewed.
Suggest amendment to Policy D6 5 to read "D. 5. avoid the loss of garden space and soil volume, including for tree planting, and or trees of townscape, biodiversity or amenity value from construction work or due to the creation of a new access or lightwell."	It is not considered necessary to add reference to particular characteristics of gardens, which are already acknowledged in paragraph 12.139.
Suggest amendment to paragraph 12.139 to read "Large canopy trees are of particular importance, necessitating minimum soil depths of 3 metres."	The planting of large canopy trees does not require soil depths of 3 metres or more.
Welcome Policy D6 and revised text at D6 A5 D6 E8.	Support welcomed.
Welcome paragraphs 12.112, 12.126.	Support welcomed.
Support paragraphs 12.131-132, 12.140-141, 12.142 -145.	Support welcomed.
Policy D6 C4: Add "except in relation to party wall boundaries, in which case requirement E affords protection to adjoining properties".	We do not consider that the suggested text is necessary as the criterion is intended to minimise the loss of garden space/ retain garden 'margins'.
Welcome the addition Policy B6 criteria E3 on embodied carbon of basement development. Concerns that this may not be enforceable as it is worded. Suggest "E3. ..proposals for basements 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 and provide details of all proposals for reducing the embodied carbon of the basement"	Support welcomed. The supporting text provides further detail on Policy B6 E.3 which states "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". No change proposed.
Where a basement development has been permitted, any new application within a certain distance of the same or adjacent streets should be coordinated to reduce the effects on neighbours – policy needed. Basement extensions are fundamentally environmentally damaging employing massive energy requirements. More generous S106 agreements to spend in the local vicinity are needed to mitigate some of the harms suffered by neighbours of basement conversions with the sums hypothecated to make improvements to that immediate area (not just to repair damage caused). Policies to support planners should look at the effects of the completed scheme in terms of changing the local conditions – sound, light, visual intrusion, loss of habitat etc.	Policy D6 sets out requirements relating to Construction Management Plans for basements. These should take into consideration other developments taking place in the local area with a view to minimising the combined effects of construction works, as set out in our detailed Camden Planning Guidance on Basements. (However, planning policy cannot control when permitted schemes are implemented.) Section 106 agreements must be necessary to make a development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. The impact of basement schemes will be assessed against Policy D6 and all other relevant policies including those on amenity, noise and biodiversity.

Policy D7- Advertisements and signage

Number of representations: approx. 2

Representations received from:

- Belsize Conservation Area Advisory Committee
- Primrose Hill Conservation Area Advisory Committee

Main Issues	Councils Response
Support Policy D7 and strongly support paragraph 12.150.	Support welcomed.
Para 12.157: Add “estate agents boards should continue to be banned in conservation areas”.	Para 12.157 sets out the Council's approach to the management of estate agents boards with further details provided on the Council's website. No additional wording is therefore considered necessary.

Policy D8 - Shopfronts

Number of representations: approx. 3

Representations received from:

- Primrose Hill Conservation Area Advisory Committee
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
Support policy, paragraphs 12.158 -12.166, and welcome D8 B5 and paragraphs 12.167 and 12.170.	Support welcomed.
KTNF requests that no oversized shop signage should be allowed on the High Street and in particular in back and side streets and industrial estates.	Comment noted. Applications for shopfronts and signage should be determined against the policies set out in the Local Plan. This would be a matter for the decision taker as part of the planning application process.
While in general we strongly support this section, the requirement for “a high standard of design” needs more specific criteria and safeguards. In our view it is, again, important to ensure adequate pre-application community engagement in judging whether applications, however “high” the standards claimed for them by applicants, are actually in sympathy with the heritage and character of an area.	It is considered that the policy approach in the Plan is sufficiently strong to ensure the delivery of well-designed shopfronts.

Chapter 13- Protecting Amenity

Policy A1- Protecting amenity

Number of representations: approx. 17

Representations received from:

- Belsize Conservation Area Advisory Committee
- Primrose Hill Conservation Area Advisory Committee
- Kentish Town Neighbourhood Forum
- Highgate Society
- Belsize Society

Main Issues	Councils Response
Strongly support Policy A1, A1 B3 and paragraphs 13.8 - 13.10	Support welcomed
Paragraph 13.22 'have regard to Policy A4' is too weak. Applicants should not cause harm to neighbours through noise and vibration: Policy A4 should be followed consistently for the policy to be sound.	Applications are assessed against the entire development plan. Policy A4 Part A4 specifically states that the Council will "resist development likely to generate unacceptable noise and vibration impacts".
The cumulative impact of more than one project is significant and needs to be addressed.	Cumulative impacts are referred to in Part B.5.
13.7 “All major applications (10 residential units or more or for sites of 1,000 sqm or more)”. The government has redefined major and minor sites in terms of 1-9 and 10-49 units and those over 49 – so this needs clarifying.	Our approach is consistent with the government definition. Development relating to 1-9 units is considered minor, 10 or more units is considered major.
13.16 “The Council will expect all major planning applications to produce a Construction Management Plan (CMP)”. Major needs to be defined.	Supporting paragraph 13.7 provides a definition of major development: "All major applications (10 residential units or more or for sites of 1,000 sqm or more)".
Policy A1 B4: Add “including light nuisance to neighbours”.	Policy A1 Part B3 states that the impacts of artificial lighting levels is one of the factors that the Council will consider when assessing planning applications. It is not considered appropriate to repeat this at A1 Part B4.

Main Issues	Councils Response
The terms planning obligation, legal agreement and S106 agreement seem to be fairly interchangeable throughout the chapter – we assume they all refer to S106 agreements. While resistance to unacceptable harm is to be applauded, there is no definition of what is considered to be “unacceptable” and so this is left wide open to subjective opinion and negotiation regarding the balance of needs.	Policy A1 Part A sets out the Council's approach to protecting the quality of life of both existing and future occupiers and neighbours. As noted in the supporting text at paragraph 13.4 "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". Policy A1 Part B sets out the factors that the Council will consider when assessing planning applications. Applicants should provide information which clearly demonstrates these factors are not unacceptably impacted. Assessment is made on a case by case basis and it is not considered appropriate to attempt to list or define what may or may not be acceptable in all possible situations.
Sunlight, daylight and overshadowing 13.7. Who decides when impacts are potentially negative? Given that BRE guidance is used as an objective standard, we strongly believe that BRE should not submit reports on behalf of applicants (which happens) as this is not objective, but is likely to be perceived to be.	The Council as Local Planning Authority will the final assessment on impacts and the merits of any supporting information submitted by applicants.
The Amenity SPD says permission is needed if lighting (inc. supporting structures) substantially affects the external appearance of a building. This is a very narrow requirement - it should apply to all lighting schemes with a potential to cause nuisance. There should be special consideration for historic buildings and buildings of architectural interest and special Sport England guidance for sports grounds and floodlighting. The Agent of Change principle should apply to artificial light and unacceptable harm should not permitted.	The Council's Amenity SPD and is not part of the Local Plan review. Local Plan Policy A1 (Protecting Amenity) Part B3 is clear that the Council will consider impacts of artificial lighting levels when assessing planning applications.
Cumulative impact of construction and damage to highways 13.16. States that CMPs should be submitted at the “earliest opportunity in the planning application process” and include input from appointed contractors and that they will “be secured via planning obligations”. This confirms that a CMP is only expected after approval has been granted. However in many cases, it will be clear to planning officers that there will access issues, on site storage issues etc. right from the beginning of the project. It is not acceptable that these are put to one side until the development has been approved. Where it is clear there will be issues these should be addressed before approval is given.	CMPs are secured via planning obligation is to ensure the enforceability of the details within it. As noted, the plan expects CMPs to be submitted at the earliest opportunity in the planning application process.
13.17. Evidence of neighbourhood consultation process should be submitted, or the Council should canvas neighbours to see if this has actually taken place.	Requirements for community engagement on CMPs is set out in the Council's Construction/Demolition Management Plan (CMP/DMP) Guidance and Requirements.
13.18. States that the Camden CMP Pro Forma Template must be used by the applicant and that the information should be proportionate to the process and transport requirements are based on the TfL Construction Logistics Plan. However Camden’s Amenity SPD says this is not enough by itself – the cumulative impact on local amenity must also be taken into account.	The Council's SPD Amenity (2021) paragraph 5.11 clarifies that although Camden's CMP pro-forma is based on TfL's Construction Logistics Plan (CLP), "Camden’s CMP process expects additional detail relating to environmental health and community liaison considerations. These are often not considered in sufficient detail within CLP templates and associated guidance. A CLP prepared solely in accordance with TfL’s CLP guidance cannot therefore be submitted as a substitute to a CMP.
13.19. “significant impact on amenity” should be clearly defined here. Also according to the Amenity SPD, the Construction Working Group should include local residents, possibly a Council nominee and a community liaison officer. The make up of the Working Group should be included in this point.	It is not considered appropriate to attempt to define significant impacts on amenity for all types of development and various contexts in which they may occur. The Council's SPD Amenity (2021) paragraphs 5.14 - 5.15 set out requirements for 'Consultation and Construction Working Groups'. Detailed information is also set out in the Council's Construction/Demolition Management Plan (CMP/DMP) Guidance and Requirements.
13.20. It would be helpful to applicants if there were a scale of charges available for construction implementation contributions and monitoring fees. We support Construction Management Bonds for “complex construction or management issues but why only relating to breaches of the CMP – the bonds should cover all damage caused by the development - and an amount held	It is not considered appropriate to provide a scale of charges within the Local Plan which would then be fixed for the duration of the Plan. It is considered appropriate and reasonable for construction management bonds to relate specifically to breaches on CMP.

Main Issues	Councils Response
for a number of years in case any problems arise subsequently e.g. subsidence as a result of the build-up of blocked groundwater.	
Water and wastewater infrastructures Impacts on groundwater should also be covered as they are very important in the North of Camden. 13.33. "Developers may be required to demonstrate there is adequate infrastructure on and off site" Why only "may" - we believe it should be mandatory for all major applications and others on a case-by-case basis.	The word 'may' is considered appropriate in this instance, as there will be circumstances where it is already known that there is adequate infrastructure on site / in the local area, meaning that further information is not required.
13.35. "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." Something this important should be dealt with at the planning application stage and not left until after permission has been granted. We believe that Water and wastewater infrastructures is a large and complex area which needs further consideration and probably its own policy.	The approach set out in paragraph 13.35 is considered both sensible and robust to ensure necessary infrastructure is secured prior to occupation of any development. This is considered to be proportionate and in accordance with sustainable development principles. Chapter 8 - Responding to the Climate Emergency includes Policies CC9 (Water efficiency), CC10 (Flood risk) and CC11 (Sustainable drainage), which are concerned with ensuring adequate water supply, minimising flood risk, and promoting sustainable drainage. Policy A1 (Protecting Amenity) Part B10 confirms that one of the factors to be considered when assessing planning applications is the "impact on water and wastewater infrastructure".
More sophisticated consideration of the effects of the completed development on neighbouring properties and the natural environment in terms of lighting, noise and smells is needed and this needs enshrining in policy.	Policy A1 seeks to protect the amenity and quality of life of existing and future occupiers and neighbours. Part B A1 sets out matters that will be considered when planning applications are assessed in terms of amenity. This includes artificial lighting levels, noise and odour.

Policy A2 – Safety and security

Number of representations: approx. 2

Representations received from:

- British Museum
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
13.41 "The Council will require a Crime Impact Assessment to be submitted with all applications for major developments." Major needs to be defined.	Supporting paragraph 13.7 provides a definition of major development: "All major applications (10 residential units or more or for sites of 1,000 sqm or more)".
This policy in its current form is framed in terms of development being required to consider safety and security. The BM requests that it is amended to explicitly support development whose purpose is to enhance the security and/or safety of buildings or spaces in Camden in response to demonstrable security threats. Any new wording should also acknowledge the potential tension between the need to pursue development that provides greater security and the aims of other policies in the Plan, for example that aim to increase permeability and access.	Paragraph 13.49 recognises that resilience to terrorism an important issue in some areas of the borough. Proposals will be considered against all relevant Local Plan policies. The weight given to particular policy objectives and the balance between them will be assessed at the planning application stage, taking into account on the specific circumstances of the scheme and site.

Policy A3 – Air quality

Number of representations: approx. 12

Representations received from:

- Highgate Society
- Kentish Town Neighbourhood Forum
- The Arch Co
- Hilson Moran
- Woodland Trust

Main Issues	Councils Response
A (1) requires all development to submit an Air Quality Neutral Assessment which does not reflect the GLA's 2023 LPG. Suggest the policy refers to GLA standards and guidance to avoid a conflict.	Part A (1) requires "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."
Policy A3 A1 KTNF wholly supports this approach.	Support welcomed.

Main Issues	Councils Response
Policy A3 A2 Major needs defining.	Agreed. Propose modification to Policy A3 A. 2. a.
Policy A3 A2C the words substantial and significant need defining.	Substantial demolition is defined in Local Plan paragraph 8.13. It is not appropriate to define 'significant' as this will vary and therefore will be assessed on a case-by-case basis.
Policy A3 KTNF wholly supports this approach.	Support welcomed.
Paragraph 13.78 PM2.5 is considered a more dangerous pollutant and is generally subject to routine monitoring – and should be monitored.	PM10 means any airborne particles with an aerodynamic diameter of 10 micrometres or less. PM2.5 is particles of 2.5 micrometres or less. Therefore, PM10 measurement includes all particles in the PM2.5 size fraction plus all particles that are larger than 2.5 micrometres but no larger than 10 micrometres. It is correct that there is stronger evidence for adverse health outcomes from PM2.5 (fine particulate matter) exposure than for PM10 (coarse particulate matter) exposure. However, construction monitoring has typically focused on PM10 measurement because emissions of dust from construction sites are predominantly in this coarser size fraction.
The use of vegetable oils as back-up fuel is increasingly being used and should be encouraged.	Comment noted.
We support the strengthened and more detailed approach to addressing air quality in the borough.	Support welcomed.
Policy A3 Air Quality “Substantial” and “significant” need to be more clearly defined.	In accordance with Institute of Air Quality Management (IAQM) guidance, we do not apply a rigid matrix for assessing ‘significance’ in the context of air quality or dust impacts from construction and development. It is necessary to maintain a degree of flexibility when assessing Air Quality Assessments and making decisions and recommendations, in order to most effectively protect public health in site-specific characteristics. There is not a formal IAQM definition of ‘substantial’ but we would consider the IAQM categorisation of demolition, earthworks, construction or trackout as having ‘medium’ or ‘large’ dust magnitude as constituting ‘substantial’. Similarly, an overall dust impact risk rating of ‘medium’ or ‘high’ would be considered as ‘substantial’.
A.6. The requirement to demonstrate GLA standards will be met should apply to all applications, not just those required to submit an AQA.	Policy A3 6 requires 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. As such, this relates to all development using NRMM.
13.80. How will conforming to the emission limit values for new plant in the Environment Agencies Medium Combustion Plant Directive be monitored? The same for sensitively positioned flues. There is a lot of good intention and technical guidance in this policy, but a confusing number of different regulations to refer to and some lack of clarity on when they apply. Unless there is adequate monitoring capacity from the Council – in terms of technical competence and capacity, the aims are unlikely to be achieved. We couldn’t find reference to a relevant “team” (as for noise), it seems that there should be one for air quality, if there isn’t already.	The specification of the plant would be included within the Air Quality Assessment /application documents. Details of flue positioning will also be included within the application documents.
We welcome the addition from the Reg 18 consultation of reference to protecting the natural environment in point A and to maximising the use of green infrastructure and nature-based solutions in point A3.	Support welcomed

Policy A4 – Noise and vibration

Number of representations: approx. 4

Representations received from:

- Highgate Society
- Primrose Hill Conservation Area Advisory Committee
- Belsize Society

Main Issues	Councils Response
Suggest Policy A4 is amended to include reference of noise in domestic gardens as per Appendix 4.	It is not considered necessary or appropriate to list all possible locations in the policy. Policy A4 Part A4 is clear

Main Issues	Councils Response
	that the Council will "resist development likely to generate unacceptable noise and vibration impacts".
Policy – Noise and Vibration Building regulations also cover internal noise and so planning regulations apply where additional sound proofing is needed. Internal noise should be assessed at planning application all necessary assessment of internal and external noise should happen at planning process stage	As noted in Policy A1 Part B6, 'noise and vibration' are factors to be considered when assessing planning applications. Policy A4 Noise and Vibration specifically deals with this matter. Policy A4 Part A2 states that the Council will ensure that where noise mitigation is required, it is incorporated into the proposed development at the design stage...". Part A4 states that the Council will "resist development likely to generate unacceptable noise and vibration impacts".
A4 7. The Council will “seek to minimise” noise from deliveries and demolition/construction. This seems to be a watering down of the claim above that applicants have to demonstrate plant and machinery must be operated without causing harm to amenity.	This wording at Policy A4 Part A7 acknowledges that it is not possible to entirely eliminate noise. Policy A4 Part A4 states that the Council will "resist development likely to generate unacceptable noise and vibration impacts".
Acoustic reports often fail to support the subjective story of a neighbour experiencing low level long-standing noise nuisance. Specific policies need to recognise the changing pattern of life and plant/equipment and the nuisance they can present to communities and individuals.	The Local Plan recognises that noise can have a significant effect on the environment and on the health and quality of life enjoyed by communities and individuals, and that Camden's high density and mixed-use nature means that exposure to noise is a particularly important issue in the borough. Policy A4 seeks to ensure that noise and vibration is appropriately considered at the design stage of developments. Further detail is set out in Camden Planning Guidance in Amenity.

Chapter 14 - Safe, Healthy and Sustainable Transport

Number of representations: approx.. 9

Representations received from:

- CPRE
- LB Barnet
- Kentish Town Neighbourhood Forum
- Highgate Conservation Area Advisory Committee

Main Issues	Councils Response
Bus route C11 must be retained where it passes through the Dartmouth Park area. Bus route 214 It is intolerable that elderly or disabled people and people pushing wheelchairs are 'thrown off the bus' at the bottom of Highgate West Hill when Highgate Village is congested by the 'School Run'.	Comment noted. This is not a matter for the Local Plan.
A budget for the future changeover of the Highline needs to be secured.	Comment noted.
KTNF welcomes the Council's aim to make transport in Camden more sustainable and to support walking, cycling, car sharing and all green means of traffic.	Support welcomed.
With a growing population in the Borough of Camden and the densification of its urban population, there will inevitably be more traffic, be it vehicles or people - more human voices, more noise. Camden needs to strengthen its monitoring efforts to fight noise pollution, to protect the mental health of its population. We suggest clear targets and tighter monitoring.	Comment noted. Policy A4 of the Plan sets out the Council's approach to managing noise in relation to development.
Large sites need traffic assessments not just during the construction period, but also assessments in terms of the future impact on public transport, once these new estates will be tenanted.	The Council's Camden Planning Guidance on Transport provides guidance on how Transport Assessments should be prepared and what they should cover.
KTNF would welcome Camden's commitment to phase timed restrictions during which only electric vehicles are allowed to travel.	Comment noted. The quality of works and maintenance works is not a matter for the Local Plan.
KTNF suggests more quality control of building, of maintenance works, and to achieve this, more monitoring of the works completed.	Comments noted. This is not a matter for the Local Plan.

Main Issues	Councils Response
The Local Plan should propose the re-allocation of land-use for at least 25% of the estimated 350 acres of kerbside space in Camden. This should be re-instated as public space. See Lambeth's Kerbside Strategy	Policy T1 Safe healthy and sustainable transport states that the Council will seek contributions from development towards the delivery of appropriate highways greening measures and 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. This is intended to support the delivery of the Council's Transport Strategy. The use of a particular kerbside space and the development of a kerbside strategy is not a matter for the Local Plan.
The Local Plan should set out the overriding key infrastructure priorities for the Borough in a general Transport policy – either in policy T3 (Public Transport) or policy T4 (Shared Transport Infrastructure and Services).	The policies for the South, Central, West and North areas of Camden set out infrastructure priorities for these areas. The site allocation policies also set out specific infrastructure requirements for different sites. The Local Plan is also supported by an Infrastructure Delivery Plan. No additional wording is therefore required.

Policy T1 - Safe, healthy and sustainable transport

Number of representations: approx. 12

Representations received from:

- GLA
- LB Barnet
- Land Sec
- Hilson Moran
- Transport for London
- Highgate Society
- Environment Agency

Main Issues	Councils Response
Paragraph 14.4 - We welcome the references made to the Mayor's Vision Zero strategy and Healthy Streets Approach, alongside the council's LIP target of 93 per cent of all journeys in Camden to be made by sustainable modes by 2041.	Support welcome.
Comments from first consultation response still applies. "1 - We agree with the key aspect, which for the first time, there is a requirement for transport to promote (fund) green space within streets. This is interesting and a new approach, which is not currently commonly accepted by highway authorities, but as industry professionals we agree do agree with. 2 - Agree with the links to noise impacts on this policy."	Support welcomed.
Policy T1: Safe, Healthy and Sustainable Transport We welcome the inclusion of wording around SuDS in clause 3 of the policy.	Support welcomed.
Policy T1 clearly incorporates the provision of equal treatment for persons with a relevant protected characteristic as defined by the Equality Act 2010, which is also included in Section 1, (Introduction) of the proposed new London Plan.	Support welcomed.
Policy T1 conflates walking, wheeling and cycling. We consider that a greater recognition of the differences within this broad category needs to be taken account of in the Local Plan.	More detail on the Council's approach to this matter is set out in Policy T2 Prioritising walking, wheeling and cycling.
14.4 The objective for 93% of journeys to be made by sustainable modes, may need to take account of a greater understanding of what constitutes a sustainable mode.	Comment noted.
14.6 We note that incentivising active travel may sometimes be in conflict with many of the other objectives listed in this section, when cycling at higher speeds and / or battery assisted cycling is involved.	Comment noted.
Paragraph 14.10 suggest amendment to read "“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	Camden Planning Guidance on Transport provides further information on Transport Assessments. We propose to review the guidance in the CPG to respond to the issues raised.

Main Issues	Councils Response
developments on Camden's infrastructure, environment and communities, <u>whether in Camden or other nearby boroughs</u> and ensure that benefits are secured which meet the needs of Camden's <u>and other nearby communities</u> ."	
Object to Part A. 11 which seeks contributions to enhancing the existing transport network from developments that increase the demand to travel. Improvements to transport infrastructure as a result of development should be funded by CIL contributions.	It is considered appropriate and reasonable in the context of section 122 of the CIL Regulations 2010 for the Council to seek contributions to enhancements to the transport network where development increases the demand to travel. The Plan states that 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.
Support approach to shifting journeys to sustainable modes, adopting the Healthy Streets Approach and exceeding London Plan requirements for car parking and cycle parking. Support for retaining the requirement for car-free development across the borough.	Support welcomed.
Should make the safeguarding limits, including sites of surface interest, clear within the draft Plan. This includes within site allocations which are subject to Crossrail 2 safeguarding directions. Policy should clearly set out the process for safeguarded sites and how this might impact development within the relevant site allocations.	Policy T1 Safe, Healthy and Sustainable Transport states that the Council will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure projects. Local Plan Transport Safeguarding Areas, HS2 Phase 1 Safeguarding and HS2 Homeowner Protection Zones are then designated on the Policies Map.
It would also be helpful to understand what elements (where applicable) of policies T1, T2, T3 and/or T4 require cross-boundary working with neighbouring boroughs, particularly where there are references to 'strategic' and 'local' networks.	Cross-boundary working on transport matters will be undertaken by relevant parts of the Council as required. No change to wording of the Plan is considered necessary.

Policy T2 - Prioritising walking, wheeling, and cycling

Number of representations: approx. 11

Representations received from:

- Highgate Society
- Unite Group PLC
- Transport for London
- The Arch Co
- Hilson Moran
- Primrose Hill Conservation Area Advisory Committee
- Belsize Society

Main Issues	Councils Response
We welcome the measures in this policy which are in alignment with the London Plan and the Sustainable Transport, Walking and Cycling LPG. We recommend including the maps of the planned walk and cycle networks as part of the supporting text.	Support welcome. We do not consider it to be necessary or appropriate to include detailed walking and cycling maps in the Local Plan. These are available to view online on the Council's website.
The creation of walking and cycling routes must not be at the expense of the commercial operations of railway arches. Public realm proposals adjacent to arches need to strike an appropriate balance between placemaking and continued vehicular access to units when in commercial use and highways regulations. Need to maintain vehicular and servicing access routes should be acknowledged in the supporting text. The ability to accommodate cycle parking requirements is very limited. The supporting text of T2(C) should acknowledge challenges impacting railway arch development.	Where new areas of public realm are being created, the Council will have regard to the impacts on existing businesses in the area (who would also be consulted about such proposals). In some cases, proposals may also be implemented through Highways legislation which has its own notification procedures. We do not consider that these matters need to be acknowledged within this policy. Part C of the policy on Cycling refers to the use of minimum standards set by the London Plan. We consider the remaining criteria in the policy to be reasonable and sufficiently flexible.
Welcome the promotion of active travel in Policy T2.	Support welcomed.
No comments as typical transport policy.	Comments noted.

Main Issues	Councils Response
Although details are given for improvements to cycle provision, there are none for the equal treatment of pedestrians, or for those who may suffer from disabilities recognized under the Equality Act 2010 as amended. Their needs may come into conflict with those of the cycling community. It may be argued that the needs of the elderly and disabled should be funded in priority to those of the cycling community, since pedestrians are first in the Council's hierarchy of road users.	Policy T1 Safe, Healthy and Sustainable Transport and Policy T2 Prioritising Walking, Wheeling, and Cycling are both clear that the Council will prioritise walking, wheeling, and cycling. No priority is given to one over the others.
14.18 As noted earlier it would be helpful to include an explanation about the meaning of “wheeling”.	Explanation of the term 'wheeling' is considered helpful. We will therefore propose a modification to address this.
T2 B. Agreed.	Support welcomed.
Policy T2 C suggest amendment to read "C. To promote cycling in the borough and ensure a safe and accessible environment for cyclists <u>taking account of the needs of other users particularly pedestrians</u>, the Council will: 5. require development to be easy and safe to cycle through (permeable) and well connected to the wider cycle network, <u>while minimising conflict with and taking account of the priority given to walking in Camden's Transport Strategy</u>;"	It is considered that this is covered by Part B of Policy T2. No additional wording is therefore considered necessary.
CPG Transport requires that PBSA schemes provide cycle parking in accordance with the London Plan. Although Unite are supportive of sustainable travel, there is concern for the level of cycle parking required due to: • Inefficient use of land. • Uptake of cycle parking is low. • This space could otherwise be used more efficiently and effectively to cater for growing demand for student bedspaces and greater amenity space for occupiers. • Such high levels of cycle parking means there is a reliance on greater proportions of high-density cycle parking i.e. two-tiered spaces. • Increased provision has led to increased under-utilised cycle parking. • Increased provision has not led to increased student cycle ownership. • Overseas students do not bring their bicycles with them. • Alternative cycle hire options are available. • PBSA schemes are generally within walking distance of the Campus and/ or benefit from good public transport links. • Safety issues associated to cycle ownership. • Limited cycle parking at universities. • Cycle hire schemes preclude the need for ownership and storage. • Greater flexibility should be afforded to PBSA schemes, Unite respectfully request that the evidence provided is given due consideration. Unite would welcome further discussion on this issue, including the potential to replace conventional cycle parking provision with considerations of pool bikes and other means of encouraging sustainable means of transport. Unite suggest a level of cycle parking equivalent to 10% of the total number of bedspaces which is a level of provision still significantly above the current take up. Recommendation: It is considered that the proposed levels of cycle parking for student housing should be considered on a case-by-case basis as supported by the evidence referred to above. At most, Camden should require a 10% provision of cycle parking spaces.	The cycle standards in the London Plan have been adopted following consideration at examination in public and form part of the development plan of all London boroughs. The Local Plan must be in general conformity with the London Plan. No change is considered necessary.
Cycle priority schemes and lanes must be more consistent in their design. Dockless hire bikes and e-scooters require greater regulation. Policies are needed on the enforcement of safe use and parking of dockless hire bikes and scooters.	Comments noted. These matters are outside of the scope of the Local Plan.

Policy T3 - Public transport

Number of representations: approx.. 6

Representations received from:

- GLA
- Primrose Hill Conservation Area Committee
- Transport for London
- Highgate Society

Main Issues	Councils Response
We note that Part A of the policy has been modified to state 'bus infrastructure' in lieu of listing relevant bus infrastructure. It would aid the effectiveness and clarity of the policy to reinstate the list. including the proposed additions in our response to the Regulation 18 consultation as part of the supporting text.	We consider that the Plan clearly sets out the Council's position in relation to this. The suggested amendment is not considered necessary.
Paragraph 14.30 - We strongly welcome the addition that passenger transport interchange facilities should be designed and delivered in accordance with Transport for London's Interchange Best Practice Guidelines.	Support welcome.
Support accessible, sustainable, public transport in Policy T3.	Support welcomed.
"The Council will ...promote step-free access and other station upgrades where possible and seek contributions from appropriate development schemes to deliver this" these good intentions do not inspire confidence that funds will in fact be available to fund the necessary work. If the interests of older and infirm passengers are to be protected the Council must provide a reliable plan for the allocation of the funds to be raised.	Detailed funding plans are not a matter for the Local Plan.
The Camden Town station capacity upgrade remains a priority. Encourage LBC to carefully consider how the policies and site allocations in the plan could make the most efficient use of land to help deliver this upgrade alongside step-free access.	Comment noted. Policy C1 sets out the Council's key priorities for Central Camden, including the delivery of step-free access at and capacity upgrades at Camden Town Underground Station. Policy C17 also sets out further criteria to guide the delivery of the Camden Town over-station development. Criteria 3 of Policy C17 states that the development must ensure that a design-led approach is taken to delivering the optimum amount of development on the site.
LBC is encouraged to make clear in the draft Plan where and how bus infrastructure, including priority measures, will be enhanced to support the efficient operation of the bus network and improved journey times. Relevant site allocations should be more specific with infrastructure requirements to protect access to the bus network and enhance infrastructure as part of development and design principles, linked to achieving sustainable mode share targets.	Policy T3 sets out the Council's approach to public transport provision in the Camden, including bus infrastructure and further requirements are also set out in the site allocation policies where relevant. More detailed guidance is also provided in the Camden Planning Guidance on Transport. No additional wording is therefore considered necessary.

Policy T4 - Shared transport infrastructure and services

Number of representations: approx.. 3

Representations received from:

- Transport for London
- Highgate Society

Main Issues	Councils Response
Our comments made in response to the Regulation 18 consultation remain valid. While car clubs are potentially able to reduce car use and ownership in areas which currently have high rates of car ownership (when paired with a reduction in general car parking), the opposite is potentially true in areas which have low rates of car ownership. This could ultimately have the opposite of the desired effect to restrain car use in parts of Camden, particularly should car clubs become readily available on demand.	Comment noted
Policy T4 Shared Transport infrastructure and services By its nature travel and transport often involves travel across borough boundaries. It would be useful to add: "The Council will work with other neighbouring boroughs to	The Council will work with neighbourhood boroughs on shared transport infrastructure as necessary. No change to the wording of the Local Plan is considered necessary.

Main Issues	Councils Response
ensure interoperability of similar schemes in adjoining boroughs."	
Nothing is said about providing motorized transport, where necessary, for those with recognized disabilities, on a shared basis, as by a shared taxi service which some boroughs already operate, part funded by the individuals who use it if they can afford it.	Shared taxi services are not a matter for the Local Plan.

Policy T5 - Parking and car-free development

Number of representations: approx. 12

Representations received from:

- Highgate Society
- Transport for London
- LB Barnet
- University College London
- CPRE
- Primrose Hill Conservation Area Advisory Committee

Main Issues	Councils Response
Part A - We welcome the amendments made in Line with our response to the Regulation 18 consultation.	Support welcome.
Part 6 - As per our Regulation 18 comments, we would like to reiterate that the wording of the policy should be clarified as follows: ' <u>where residential estates are redeveloped</u> , reduce on-site parking, as far as possible, <u>with a land for the redeveloped site to eventually be car free as part of re-development schemes.</u> ' The London Plan is clear that where sites are redeveloped the most up to date parking standards should be applied. The car free requirement of this Local Plan policy should be applied to all residential and commercial redevelopments except where existing residents with entitlements to parking permits are rehoused as part of an estate redevelopment. The amended wording would be consistent with paragraph 14.48.	We consider that the Plan clearly sets out the Council's position in relation to this. The suggested amendment is not considered necessary.
Strongly support policy T5 A8.	Support welcomed.
Problems may arise where a new development is car-free, and accommodates no elderly or disabled residents at the outset, but as the original residents age or become infirm their needs change. Policy T5 suggested amendment "The Council will limit the availability of parking and require all in new developments in the borough generally requiring them to be car-free to reduce car ownership and vehicle use and encourage the use of alternative, sustainable modes of travel. Provision of parking will be considered in the context of the PTAL rating of the location and availability and suitability of other alternative modes of travel."	The proposed wording is not considered appropriate as it would weaken the Plan's approach to car free development. Policy T5 allows for spaces designated for disabled people where necessary.
A5. the Council will "support redevelopment of existing areas of car parking (including garages) for alternative uses" may make it difficult or impossible for persons with protected characteristics under the Equality Act to find parking where necessary. Once the garages and parking lots are redeveloped for other uses the spaces for those in need will disappear.	Policy T5 allows for spaces designated for disabled people where necessary.
A7. It is not clear what the objectives involved within a "parking management plan" would be.	Further details on this are set out in the Council's Camden Planning Guidance on Transport.
Policy T5 A9 suggest amendment to read "The Council will seek contributions towards the review of Controlled Parking Zones (CPZs) where a development is shown expected to contribute to an increase in on-street parking in a local area during the construction phase or permanently. Where a development may or have an unacceptable impact on highway safety, arrangements for parking in the vicinity may need to be reviewed."	It is considered that the existing wording in the policy is appropriate and no change is therefore considered necessary.

Main Issues	Councils Response
14.45 the statement: “All new residential developments in the borough, including schemes where homes are created through a change of use, should be car-free.” This should be replaced with: “New residential developments in the borough, including schemes where homes are created through a change of use, should generally be car-free.”	The proposed wording is not considered appropriate as it would weaken the Plan's approach to car free development.
14.48. the Council “will only consider the retention or re-provision 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” How is this to be demonstrated? What are the criteria to be applied? Present needs may not be the same as future needs, not all of which will be foreseeable.	Further details on this are set out in the supporting text to the policy and in the Council's Camden Planning Guidance on Transport.
• Suggestion for ‘disabled car parking spaces’ to be amended to “accessible parking spaces” (acknowledging wheelchair-accessible vehicles are classified as vans and may not conform to standard car dimensions). • Particular emphasis should be made to EV charging points at accessible bays (under draft supporting paragraph 10.37). • The list of access measures for parking under Appendix 2 of the draft Local Plan should specifically include accessible EV parking.	Policy T5 states that "On-site parking in new developments will be limited to: a. spaces designated for disabled people where necessary" and criteria A.3 states the Council will "require developments that provide or retain on-site parking to install electric vehicle (EV) charging points in accordance with London Plan requirements." Given this no change to wording is considered necessary.
LB Camden should take account of LB Barnet's policy on parking in areas with shared boundaries with both Boroughs	Comment noted.
Strongly support the Council's commitment to limit the availability of parking, redevelop existing car parks for alternative uses and require all new developments in the borough to be car-free. The Plan must also recognise the need and allocate space for sustainable/active transport including delivery hubs.	Policy T6 Sustainable movement of goods, services and materials supports the provision of delivery hubs in Camden.

Policy T6 - Sustainable movement of goods, services, and material

Number of representations: approx.. 7

Representations received from:

- Canal and River Trust
- Tarmac Trading Ltd
- Hilson Moran
- Transport for London
- Highgate Society

Main Issues	Councils Response
Part A.5 - We welcome the amendments made to the priority order in line with our response to the Regulation 18 consultation.	Support welcome.
Part B.3 - The comments made in our response to the regulation 18 consultation remain valid. We would like to reiterate our point on the consistent use of the terms Construction Logistic Plans and Delivery Servicing Plans throughout the Local Plan to provide better clarity for readers. This is in accordance with the London Plan and TfL Guidance.	Construction Logistics Plans form part of a Construction Management Plan. The Local Plan refers to both Construction Management Plans and Delivery and Servicing Plans. These are terms that have been in use in Camden for a number of years and which stakeholders are familiar with. Given this, we do not consider it necessary or helpful to change how we refer to these documents.
Paragraph 14.58 - We welcome the clarification that any cycle infrastructure to support cargo bike usage should be provided in addition to wide-spaced Sheffield stands for non-standard cycles.	Support welcome.
Our Reg 18 comments regarding canal towpath and access improvements have not been added to any site allocations, but are included more generally in environment and transport policies (p425 – Policy NE1: 7, Policy T6 A.1, p535 – para 14.61).	Comments noted.
Comments from first consultation response still applies. "1 - Agree with policy, as it will require developers to consider impact during construction and sustainable modes, such as cargo bikes for cargo."	Support welcomed.

Main Issues	Councils Response
Camden should seek to encourage the use of bicycle/cargo bikes, light electric vehicles, canal, and rail through the use of charges and prices to incentivise the adoption of desired behaviours and modes of transport, and should also encourage TfL to adopt such approaches, including potentially road user charges for vehicles.	Comment noted. This is not a matter for the Local Plan.
Support the Policy and reference to Kings Cross rail aggregates but need the area defined within policy and criterion to protect it.	Support welcomed. The aggregates safeguarding area is defined on the Council's Policies Map and protected through Policy S1 South Camden and T6 Sustainable Movement of Goods, Services and Materials. No additional wording is therefore considered necessary.

Chapter 15 – Delivery and Monitoring

Policy DM1 - Delivery and monitoring

Number of representations: approx.. 5

Representations received from:

- Camden YIMBY
- Land Sec
- Transport for London
- Kentish Town Neighbourhood Forum

Main Issues	Councils Response
KTNF supports the approach outlined in this chapter.	Support welcomed.
Welcome the amendments made in Line with our response to the regulation 18 consultation.	Support welcome.
NPPF Paragraph(s) Breached 48. Include delivery-plan & monitoring target to meet 8- / 13-week statutory deadlines; resource Planning Service accordingly.	This is not a matter for the Local Plan.
Support the recognition of landowners as partners that the Council will work with.	Support welcomed.
Support the recognition of the need for sensitive and flexible implementation of the Plan.	Support welcomed.

Appendices

Number of representations: approx.. 5

Representations received from:

- Hilson Moran

Main Issues	Councils Response
Appendix 4 Table B - It should be noted that the LAFmax criteria is not for all events. Typically this would be not to be exceeded more than 10 to 15 times a night, to avoid designing to anomalous peak events.	As noted in the explanatory text beneath the table, the levels provided in Table B 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".
Appendix 4 Industrial and Commercial Noise Sources - as previous comment, the Rating Level already accounts for tonality so further correction to 15 dB below background should not be applied.	As noted within the explanatory text relating to industrial and commercial noise sources (above Table C); "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.
Appendix 4 Entertainment Noise - measurement limits are given for 'entertainment and plant noise', whereas different limits are already given for plant noise. This should just refer to entertainment noise.	Table D is relevant to entertainment noise and provides details of noise levels applicable to proposed entertainment premises (customer noise). The explanatory text beneath the table sets out the required approach for entertainment and plant noise.
Appendix 4 Entertainment Noise - The requirement to achieve a level of noise intrusion at 31.5 Hz is unfeasible	The explanatory text beneath Table D (relevant to entertainment noise) is clear that: "For entertainment and

Main Issues	Councils Response
in design. There is no test procedure for facade constructions down to 31.5 Hz.	plant noise, rating curves should be measured as a 15 minute linear Leq at the octave band centre frequencies 31.5 to 8 KHz". Furthermore, the Council recommends 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".
It should also be noted that BS 8233:2014 is in the process of being updated. The 2014 version is specifically referred to in the document so it will be assumed that this is still the applicable document even if withdrawn by BSI.	The explanatory text is clear that; "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".

Evidence Base

Number of representations: approx. 24

Representations received from:

- Natural England
- Kilburn Solutions
- Sport England
- Metropolitan Police
- Department for Education
- Environment Agency
- UK Power Networks
- Highgate Society
- St George West London
- NHS HUDU
- Tarmac Trading Ltd
- Royal Free Hospital
- Canal and River Trust
- Harrisson Varma Projects

Main Issues	Councils Response
Open Space and Sports Study - The Council does not have an up-to-date or robust strategies relating to sports facilities such as a playing pitch strategy, indoor/built sport strategy or similar. Although the Euston strategy could be argued to be up-to-date, it has not been renewed or updated and only focusses on a specific area of the Borough. Para. 103 of the NPPF requires an up-to-date assessment.	Based on the Borough's circumstances, we do not consider that preparing revised open space and sports evidence is needed or proportionate. Since the last Local Plan was adopted in 2017, there have only been limited changes in the supply of open space and sports facilities in the borough. Except for the Euston area and site allocations involving certain large sites, there is limited land available for delivering new open spaces and sports facilities regardless of the level of demand. Further detail on this matter is set out in the Council's Open Space and Sport Topic Paper.
Regent's Canal Conservation Area Appraisal (2008) includes quite a few recommendations for canalside development and could be a useful reference for developers and decision makers, but we note it is out of date with respect to developments at King's Cross and Camden Market, and also British Waterways' transfer to the Canal & River Trust. We would be pleased to work with LB Camden to update this document, as well as the Primrose Hill Conservation Area Statement (2001) which includes reference to the Regent's Canal, but not the Trust.	Comment noted.
No issues raised on the Habitats Regulations Assessment .	Comment noted.
We have no further comments to add in relation to the evidence base submitted as part of the draft local plan since our Regulation 18 response (dated: 13 March 2024).	Comments noted.
Sustainability Appraisal - No issues raised on the Sustainability Appraisal.	Comment noted.
Sustainability Appraisal - The statement in the Sustainability Appraisal ' Given the location of this site and the need to ensure an on-going retail presence, there is little or no potential to deliver additional development here.'	The purpose of the Sustainability Appraisal is to identify and appraise a range of growth scenarios. As part of the process of defining reasonable growth scenarios the Sustainability Appraisal considers strategic factors which

Main Issues	Councils Response
should be removed as it is unsound. Development options have not been fully explored and this could prejudice a future planning application.	have a bearing on growth scenarios, individual site options which have a bearing on the delivery of growth and also options around the delivery of growth for the sub areas identified in the Local Plan. Para 4.99 therefore needs to be seen in the wider context of informing the consideration of reasonable high level growth scenarios in the Sustainability Appraisal. Ultimately any planning application for 88 – 92 Kilburn Rd will be determined against the policies in the Council's development plan, not the Sustainability Appraisal.
Sustainability Appraisal - The statement in Section 7.106 lists the site and says, 'West End Lane is Locally Listed.'... is misleading and should be amended to make clear exactly which buildings on West End Lane are locally listed.	The purpose of para 7.106 of the Sustainability Appraisal is to identify site allocations that are either in a Conservation Area or in close proximity to a Listed Building or Locally Listed Building. The site in question (88 – 92 Kilburn High Rd) is adjacent to a Locally Listed building on West End Lane (2 West End Lane)
• The Council's Whole Plan Viability Assessment (WPVA 2025) has not responded to impacts of significant build cost inflation, registered provider and financial constraints. Following a format which fails to meet the NPPG, and the unintended consequence of supporting 50% affordable housing, which is clearly not deliverable. • Given the significant divergence from the 50% affordable threshold promoted by the Local Plan, the threshold of 50% in Policy H4 should be revised. • The NPPF expects plans to be 'be prepared positively, in a way that is aspirational but deliverable', but there is no evidence to support a 50% threshold as a deliverable and sound threshold, resulting in it being a misleading figure when included in a local plan.	The London Plan's Strategic Target is 50% with the threshold approach being 35%/50% dependant on the site in question. This target has been in place historically in Camden for a long time given the acute housing need in the Borough. This is emphasised by Para 7.14 of the Plan which states "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's policies respond to this, seeking to "maximise the supply" of both self-contained housing and affordable housing. Given the acute need for affordable housing in the Borough this is a reasonable approach for the Council to take to ensure every site does what it can whilst being able to be delivered in the Borough. We will however continue to apply both the London Plan and Camden's policies on a flexible basis i.e. affordable housing is sought to be negotiated, and this includes consideration for the London Plan's threshold viability approach which identifies that sites that deliver less than 35% (on certain sites) have to go through the viability tested route. We note that the Applicant went through the viability tested route in their 2018 application with the agreed position being 39% AH by habitable room circa 34% by area and 32% by no units.
Viability Assessment - The proposed affordable housing policies should be amended and set at a level where development is deliverable. This will be below 35% and 50% respectively.	Quod's para 3.2 partially quotes from our Local Plan Review Viability Study – Regulation 19 Update (LPRVS R19) and consequently does not provide the full context of our advice. The remainder of the second bullet point to Para 1.7 of the LPRVS R19 that they quote from goes on to qualify that (with our emphasis underlined and bolded): "The <u>results therefore do not point to any particular level of affordable housing that most schemes can viably deliver</u>. The Council's <u>draft Policy H4 maintains the currently adopted strategic target of 50% (applied on a sliding scale)</u> and <u>takes into consideration the economics and financial viability of site-specific circumstances</u>. Given that this <u>reflects the Council's current practice</u> and also the <u>approach in the 2021 London Plan</u>, we consider the draft Policy to be reasonable. It allows for sufficient flexibility, both in terms of tenure mix and overall quantum, to <u>enable schemes to come forward with the maximum viable package of affordable housing. Setting a lower proportion of affordable housing would likely result in a lower overall number of affordable units being delivered</u>, as sites that <u>could</u> have <u>delivered more would no longer do so</u>. There is no guarantee that a specific reduced target level of AH below 35%-50% would ensure all development could come forward. Even at 0% not all development will be deliverable. Given the acute need for affordable housing in the Borough this is a reasonable approach for

Main Issues	Councils Response
Viability Assessment - The WPVA refers to Camden Goods Yard as one of only two current and emerging significant developments in the Borough. The other comprises a redevelopment of retail floorspace for new homes and new replacement retail. Despite this, the WPVA does not test either scheme (as NPPG expects it to) and does not include a mixed use typology of residential & retail uses, favouring a single use typology of 575 homes (No.16) instead. As a result of the failure to individually test strategic sites, key characteristics of these sites are omitted from the viability testing. This includes site-specific benchmark land values and infrastructure costs. The approach taken by BNPP does not meet the requirements of PPG New viability testing should be undertaken assessing strategic sites separately and an affordable housing policy for such sites should be included based on evidence.	the Council to take to ensure every site does what it can whilst being able to be delivered in the Borough. The key reasoning behind not specifically testing the deliverability and developability of this site is that the scheme had obtained planning permission and development commenced on the site in Q4 2021. We understand that, the position of the development on the site as at the end of Q2 2025 Regent House is as follows: The main site has been cleared, Building A/The Regent is 110 private, commenced is due to complete in Q4 2025 to Q1 2026. It has progressed to envelope complete and homes are being fitted out. The Molior London database reports that although the sales total is secret, they believe this block to be circa 50% sold. Building B/Market is 108 private plus 60 affordable and is due to complete in Q3 2026. It has been erected to completion of superstructure frame with façade currently being completed and the fit out of homes has commenced. The basement has been constructed for the new Morrisons 'box', including a podium deck for other future residential buildings. The smaller site has been cleared, and a temporary supermarket has been open since February 2021. Consequently a total of 278 units (43% of the total consented units) are currently being delivered on the site. Still to be commenced: - Block C is 96 private. - Block D is four private plus 38 affordable. - Block E1 is 50 private. - Block E2 is six private plus 17 affordable. - Block F (Bloomsbury) is 67 private plus 88 affordable. Given the size of the scheme, the development is anticipated by the Local Plan's housing trajectory to be delivered over a nine year period so both the short and medium terms. In light of the above, the Council had no reason to believe that the development as consented was not deliverable and developable and did not require specific testing, being in line with the requirements of the NPPF. To this end we note that the NPPF indicates that for developments due to be developed and delivered after the first 5 years of the plan, "to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged." We appreciate that the site is also now subject to a site and scheme specific planning appeal seeking to amend the scheme from that consented. We would highlight that the Developer can still choose to deliver the development commenced as consented. In terms of assessing the viability of the scheme it is considered that there is better scheme information and testing available as part of the application that the Council is able to rely on as part of it's evidence base. The Council's viability consultants reviewed the Applicant's submission and deemed their offer not to reflect the maximum reasonable or viable level of affordable housing and the application was refused with this being one of the reasons for refusal.
Viability Assessment - The viability appraisals should be shared in full and further engagement undertaken with landowners and developers once access to this information is provided.	BNP Paribas have stated...The viability evidence base sets out all of our assumptions we have adopted in our appraisals. The viability report as presented in support of the emerging Camden Local Plan is also in line with numerous other viability studies produced, submitted and examined for other local authorities and found to be both a sound and appropriate basis for demonstrating the viability of local plan policies. As identified by Quod. When requested <u>we have provided</u> a copy of the cashflow of the development. We would highlight that all of the information as to the typologies and the inputs adopted have been set out in the LPRVS R19.

Main Issues	Councils Response
Viability Assessment - It isn't yet clear if all Fire Safety requirements have been considered albeit reference is made to 'second stairs'. There is no specific reference to BS9991, that was introduced in November 2024, which is estimated to reduce building efficiencies by a further 1-2%, equivalent to c.£7m on the relevant typology.	With regards to the reference to BS9991. BNP Paribas have stated...This requirement was updated and implemented in November 2024 and as a result not included in the build costs advised by CDM as their advice was from the end of 2023. CDM have advised that, this covers evacuation relating to lifts, staircases, smoke extract, alerts systems etc and management of residential buildings all relating to life safety in the event of fire. The Mayor and GLA had already implemented some of its recommendations particularly relating to additional staircases and other regulations have dealt with other fire safety matters such as sprinklers and smoke extract. These were all allowed for in their costs, however there are some costs relating to evacuation lifts and alert systems which are not allowed for in their costs. CDM have advised that this could potentially give rise to a 0.5% addition to the base 2023 costs for buildings over 4 storeys i.e. Typologies 5-13. This is a small increase in build costs so would have a nominal impact on development viability, further, understandably requirements move on over time and the viability work was based on a snapshot in time. In terms of reducing building efficiency, we have predominantly adopted a net to gross internal area ratio of circa 75%, which in ours and CDM's experience is not an unreasonable assumption for an area wide assessment of developments.
Viability Assessment - Qn why exceptional / abnormal costs have been excluded from the study	BNP Paribas have stated that...With respect to the inclusion of exceptional/abnormal costs, these are too variable and site and scheme specific to assess explicitly within an area wide viability assessment. We further note that the PPG provides a very clear direction that abnormal costs, such as contamination arising from previous uses must be reflected in the Benchmark Land Value set for the site. In other words, the previous landowner who has caused the contamination should accept a reduced land value to account for the costs associated with their previous use.
Viability Assessment - The proposed developers return of a fixed 17.5% profit on gross development value for market homes is unrealistic, particularly for strategic sites with longer timescales, more up-front costs and greater risk profile.	BNP Paribas have stated that...The adopted rate of 17.5% is reflective of the rate of profit that we most typically see in the circa 300 FVAs supporting live planning applications that we review annually. We do not accept that profit should be increased to 20% and indeed there is no evidence in the representation supporting this contention. We note that although the evidence Quod have provided seeks to support their finance point, it also confirms that Quod appears to cherry-picking evidence and inputs. In all bar one of the FVAs quoted to support QUOD's case on the point of finance rates the profit position adopted/agreed was 17.5%. We note that although Quod and Berkley have submitted the FVA using IRR as the profit measure, the Council's' viability advisors have assessed the site on the basis of a profit on cost of 17.5%.
Viability Assessment - The assumed finance rate of 6.5%, is not reflective of current and future forecast market conditions.	BNP Paribas have stated that...In our experience current finance rates applied in viability assessments are typically 7%, however we have considered the forecast trajectory of interest rates and the fact that emerging Local Plan policies will be in place for a long-term period (15 years – starting with 2026/27 and concluding with 2040/41). The finance rate applied is therefore a reasonable reflection of the costs developments in the Borough will incur. We would also highlight that there is not a linear relationship between the Bank of England base rate and development finance rates, as the representation implies. Before the period of ultra-low interest rates between 2009 and 2022, the BOE base rate typically fluctuated in a range between 4% and 5% and development finance rates were at around 6%. Equally when base rates reduced below 1% finance rates adopted in FVAs did not reduce by 3-4%. We note that of the seven example FVA's submitted to support Quod's point, five are of significantly smaller schemes than the CGY site (between 14 to 30 units). One of these examples is also a self-build scheme located in

Main Issues	Councils Response
	Great Dunmow in Uttlesford District. We note that QUOD and Berkley homes are advocating an IRR approach to assessment. In BNPPRE's experience IRRs are adopted in scheme which are significantly larger than the CGY site usually delivering over a thousand units e.g. Battersea Power Station (circa 1,300 resi units), Wood Wharf (circa 3,000 units), Greenwich Peninsular (circa 5,800 units). We are aware that Berkely Homes have adopted profit on GDV measures of profit in their FVAs supporting schemes of up to 800 units in London. Furthermore in relation to para 3.26 of QUODs response BNP Paribas have stated...We note that QUOD's representations only address any aspects they consider to be downside inputs i.e. make viability worse. They do not address any aspects that are cautious or could improve viability on the scheme. For example, we note that their submitted FVA indicates a sales value of the units on the CGY site of circa £1,463 psf, which was disputed by the Council's advisors and increased to £1,555 psf. Despite their commenting that the highest sales value position tested is £1,300 psf they do not go on to set out that this is cautious by comparison to the sales values they have adopted in their assessment of the development on their site. On this basis their representation does not present a balanced picture or argument on the viability testing undertaken. We note that the Council's advisors concluded at para 4.23 in their review of the CGY submitted viability assessment that, "After these changes we identify a surplus of c.£65m. On this basis we calculate that the scheme would be able to contribute towards or provide additional affordable housing above the 15% proposed." This would broadly indicate that the viability testing supporting the local plan presents a reasonable if conservative position on the viability of development in the Borough.
Housing Evidence - To ensure the Local Plan is sound, it should be supported by up-to-date evidence on the need for specialist housing, The Housing Needs Assessment 2025 assessment should be made publicly available.	The Submission Draft Camden Local Plan 2025 incorporates our high level assessment of need for most specialised housing types. For example, paragraphs 7.241 and 7.242 address the housing needs of older people, paragraphs 7.276-7.277 and 7.280-7.281 address the need for student accommodation, and paragraphs 7.191 to 7.195 address the needs of people wishing to commission or build their own homes. The Council will provide and publish such further assessment as may be needed up to and during Public Examination of the Local Plan. We note that the NPPF December 2024 does not seek an assessment of the needs of those seeking shared accommodation, nevertheless, the Camden Local Housing Needs Assessment 2025 does address Co-living at paragraphs 4.94 to 4.101.
Infrastructure Delivery Plan - MPS receive government grant funding but this is not enough to fund policing resourcing so developer contributions are sought. Additional homes and employment significantly increase the need for policing. MPS seek developer contributions from residential developments that are referable to the Mayor of London. Suggest the wording in the Funding section of the Emergency Services and Community Safety section of the IDP is amended to read: "The Metropolitan Police Service is primarily funded by the Home Office and the Mayor of London's Office for Policing and Crime (MPOAC). The Home Office provides a majority share of funding, with the Mayor supplementing this through a combination of contributions from City Hall, council tax and business rates. <u>However, there is a significant funding shortfall and additional sources of funding are required to accommodate the requirements arising from new development.</u> <u>It should be noted that the Metropolitan Police Service has developed a model for defining a proportionate level of contribution towards the policing resource generated by new development and will be likely seek contributions</u>	We propose to refer to contributions from schemes referable to the Mayor of London in the IDP but we do not propose extending the use of contributions for policing beyond schemes referable to the Mayor of London as separate funding arrangements already exist to meet policing costs in the capital

Main Issues	Councils Response
<u>using this model for development proposals that are referable to the Mayor of London. Areas for use of contributions that have been identified include staff set up costs, vehicles, mobile IT, Police National Database (e.g. licences, IT and telephony) and the provision of police accommodation.</u> <u>Applicants proposing referable schemes are encouraged to engage with the Metropolitan Police Service at the pre-application stage to help understand the amount likely to be sought through this modelling and any specific policing infrastructure that might be sought within the scheme itself."</u>	
Infrastructure Delivery Plan - We look forward to working with the Council to ensure the IDP reflects the latest forecast for health infrastructure and the needs of the wider community.	Comment noted.
Infrastructure Delivery Plan - There is no recognition of the need for a permanent site for Abacus Belsize Primary School, within the IDP or as site allocations on the proposals map. There should be explicit reference in the IDP to the need for a permanent home for Abacus Primary School. Text needs to be corrected to reflect how the free school presumption operates (as per s10 and s11 of the Education & Inspection Act 2006)	We propose to amend the IDP to address these matters
Infrastructure Delivery Plan - Appendix 1: Infrastructure Schedule has been removed from the plan. It is therefore requested that an Infrastructure Schedule is re-introduced, and the Royal Free Hospital is re added and takes into consideration the submitted information.	The Infrastructure Schedule in Appendix 1 of the Regulation 18 Draft Local Plan has been replaced by the Camden Infrastructure Delivery Plan (IDP) published as part of the Local Plan evidence base. The Royal Free Hospital is addressed in Chapter 10 of the IDP on Health.
At page 149 there is a map of cycle routes. Highgate Road and Swains Lane are shown as cycling routes for consultation/ engagement during 2025/26 however so far there has not been any consultation/engagement The cycle route up Dartmouth Park Hill comes to an end at Highgate Road however there is no proposal for a cycle route up Highgate Hill and Highgate High Street or Hornsey Lane. The northern section of Dartmouth Park Hill is narrow and it would not be possible to install a cycle lane while retaining 2 way traffic. Greater recognition of cross boundary issues is needed. Under the heading 'Healthy Routes (Cycling)', add an additional bullet: <u>"Where cycle routes and cycleways connect cycle journeys to or from other boroughs, Camden will prioritise working with relevant boroughs so that a coherent area wide route network is created."</u> At page 150 under Healthy School Streets, amend text as follows: "Measures to improve road safety and enable walking, cycling, wheeling and public transport to and from schools <u>including those on borough boundary roads</u> with 'timed' access restrictions outside schools in feasible locations. IDP does not address/reference the air quality issues on the London Underground 2.3 refers to an "emerging scheme in Dartmouth Park Area" - this should be referred to as a 'possible scheme'. It is not always true that Healthy Streets schemes "'deliver excellent value for money". Amend as follows: 'Healthy Street projects <u>can depending on the circumstances</u> deliver excellent value for money <u>for local businesses.</u>'"	The IDP identifies key emerging plans and proposals for infrastructure - it is not possible to explore their detailed design or feasibility (which is subject to separate consultation led by Camden's Highways officers). The IDP can only show cycle routes in LB Camden - Hornsey Lane is not in LB Camden It is not necessary to identify cross-boundary working / consultation with neighbouring boroughs in the IDP - this will occur when schemes are being developed and/or implemented The clarification relating to borough boundary roads is not required as they are addressed by the existing text in the IDP Air quality matters relating to the London Underground are primarily a matter for TfL and unlikely to receive funding from planning obligations. However, we proposed to add a sentence in the IDP to reference this issue The Dartmouth Park Healthy Neighbourhood scheme is included as part of the delivery plan for the Camden Transport Strategy covering the period 2025 to 2028 (agreed by LB Camden's Cabinet in November 2024): it is not necessary or appropriate for the IDP to provide updates on the progression of each scheme: we are however be looking to undertake annual reviews of this document. The reference to 'value for money' refers to the prioritisation of individual projects, it is not intended to refer to the ROI of schemes that have already been implemented
I am writing to provide our response to Camden's Local Plan submission consultation. We appreciate the opportunity to contribute to the development of the Local Plan and would like to highlight the following key points: • The Local Area Energy Plan (LAEP) phase 1 outputs for the Central, Inner East and North London (CIENL) subregion, which includes Camden, shaped the UK Power Networks' 2025 Distribution Future	Comments noted. We will continue to work with UK Power Networks on the Local Area Energy Plan Phase 2.

Main Issues	Councils Response
Energy Scenarios (DFES). Data sources for the CIENL LAEP phase 1 included site allocations from the London Borough of Camden Local Plan. • The 2025 DFES predictions were subsequently used to identify future capacity via our 2025 Distribution Network Options Assessment (DNOA). • In our DNOA process, we identify future capacity needs based on the latest predictions from our DFES. We then source all the viable options to resolve our system needs, compare them and make a recommendation for the optimal solution. • The 2025 DNOA identified assets within the London Borough of Camden that require intervention ahead of what was expected prior to the CIENL LAEP phase 1 outputs. • Assessment is annual and we will continue to consider data shared by London Borough of Camden. • We are aware that London Borough of Camden are undertaking a LAEP phase 2. We will continue our collaboration with them as they advance their LAEP phase 2 to inform our forecasts. • Through UK Power Networks DFES, we also consider housing projections. This year, in collaboration with local authorities we are evolving, through our LAEP support framework, additional approaches to bring in housing data through the local authorities themselves. This includes Camden. We look forward to supporting London Borough of Camden and our continuous engagement.	
Site Selection Topic Paper - Allocation S20 York Way Depot and adjacent land at Freight Lane directly north of Tarmac's Kings Cross Plant. Its current use is compatible with the operations at the Tarmac's Plant as it is not considered sensitive development. The assessment in the Site Selection Topic Paper considers the Allocation Site to be suitable as it is a brownfield site, is located in an area with a high Index of Multiple Deprivation score; and has good accessibility. The assessment identifies multiple constraints with the Site, including being 'nearby an Aggregate Safeguarding Site' and 'Noise'.	Comment noted

Policies Map

Number of representations received: approx. 158

Representations received from:

- Residents
- New Etons Residents Association
- GLA
- Waterlow Park Trust Advisory Group
- Shaftesbury Capital PLC
- General Projects Ltd
- Tarmac Trading Ltd

Main Issues	Councils Response
Policies map should show the area which the mixed use policy (Policy H2) applies.	We do not agree that the Policies Map would be clarified by adding the boundary of the areas where Policy H2 Part B applies. The Policies Map already shows the boundary of the defined South Camden sub-area and the town centre boundaries of Camden Town and Finchley Road/ Swiss Cottage. The remaining area described in Local Plan paragraph 7.39 is simply the enclosed area between the boundary of the South Camden sub-area and the town centre of Camden Town. We consider that duplicating boundaries already shown on the Policies Map would make it harder to read.
Welcome the inclusion of King's Cross Concrete Plant within an Aggregate Safeguarding Area on the Policies Map.	Support welcomed.

Main Issues	Councils Response
Policies Map refers to "Specialist Centres" whereas the Local Plan refers to "Specialist Areas" - should be amended for clarity and consistency "Central London Area" - there are no corresponding policies referring to this area. Should be amended to 'Central Activities Zone' as this is the terminology used in the Local Plan	Propose modifications to the Policies Map for clarity
Request the formal inclusion of the view from Waterlow Park towards London, notably the Dome of St Paul's Cathedral as a locally designated view. This is integral to the area's character as described in the CACA. We have submitted a request to the Greater London Authority seeking formal designation of the sightline in the new London Plan	The Local Plan reflects the strategic views of St Paul's and London identified in the London View Management Framework prepared by the Mayor of London / GLA to support the London Plan. As the view from Waterlow Park towards London / St Paul's would impact a number of boroughs, its designation is most properly considered as a strategic view by the GLA. The Local Plan will reflect any new view designation made by the GLA.
Many valued local views are referenced only within SPDs making them difficult to access and at risk of being overlooked. Bringing together all locally designated views into a single, accessible document as part of a new Local Plan would align with this best practice, increase transparency, and ensure consistent protection and enhancement of Camden's unique townscape and landscape assets. Council should consult Conservation Advisory Committees to prepare a consolidated list to reflect local knowledge and community priorities.	The Plan is intended to be read in conjunction with SPDs such as Conservation Area Character Appraisals as well as neighbourhood plans (which also in some cases feature local views). These documents, and the views within them, are amended outside of the process for updating the Local Plan. We do not consider it necessary or appropriate to include this information in the Local Plan.
The majority of comments on the Policies Map request the deletion of site allocation C27 land adjacent to Constable house from the policies map and schedule of site allocations.	The Council has a statutory obligation to plan for the needs of Gypsies and Travellers and a duty to consider the housing needs of all our residents. The land adjacent to Constable House was considered to be suitable and available for allocation to help meet the accommodation needs of Gypsies and Travellers, following a detailed Gypsy and Traveller Site Identification Study and further assessment work. Further information on the approach taken in the Local Plan to help meet the accommodation needs of Gypsies and Travellers in Camden is set out in the Gypsy and Traveller Topic Paper.
Site Allocation W7 Gondar Gardens - Previously agreed SINC boundary is not shown correctly. The northern end was narrower previously which made development unviable	The SINC boundary reflects the findings of the Review of Sites of Importance for Nature Conservation 2024 carried out by the London Wildlife Trust to inform the Local Plan.
The LSIS, waste sites and aggregate sites should be clearly identified on the Policies Map.	Comment noted. These sites are designated on our draft Policies Map.