

# Camden Local Plan

2017



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# 1. Introduction

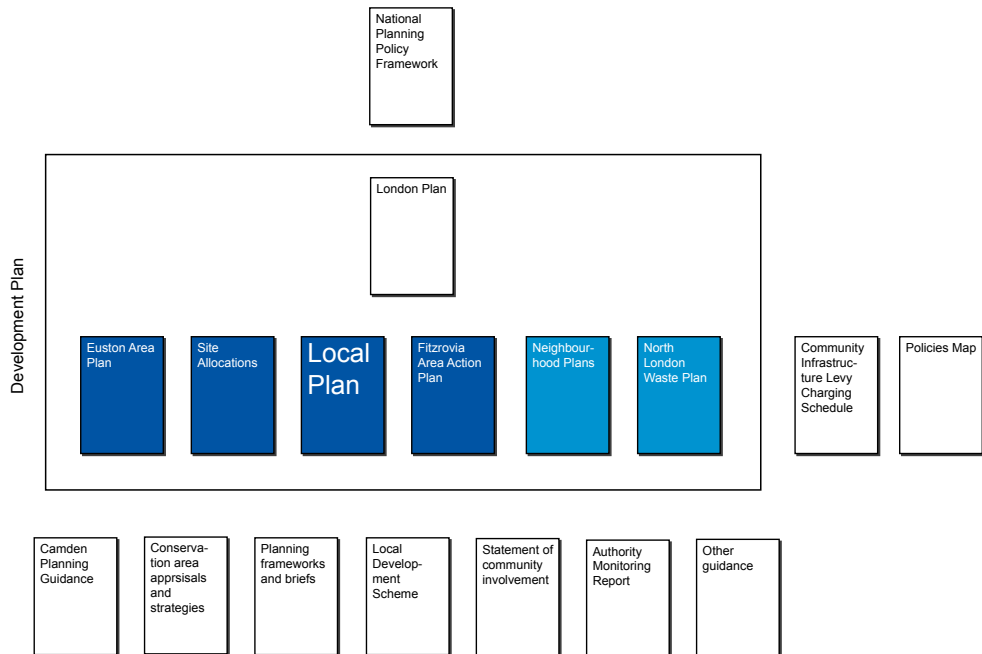
# Camden Local Plan

- 1.1 The Camden Local Plan sets out the Council’s planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough’s unique characteristics and contribute to delivering the Camden Plan and other local priorities. The Local Plan will cover the period from 2016-2031.
- 1.2 The Local Plan will play an essential role in the delivery of the Camden Plan, which sets out the Council’s vision for the borough, through 5 strategic objectives as set out in para 1.34. The Local Plan in particular will help deliver the objectives of creating the conditions for harnessing the benefits of economic growth, reducing inequality and securing sustainable neighbourhoods. It will also assist the delivery of other plans and strategies prepared by the Council and other service bodies, for example master plans and planning briefs.

## Camden’s development plan

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

## Planning document hierarchy



### Other documents in Camden's development plan

- 1.4 Camden Site Allocations – this identifies known development sites in Camden's main growth areas and other locations across the borough and sets out the Council's expectations for them. It was adopted by the Council in 2013 and will be fully reviewed following adoption of the Local Plan.
- 1.5 Fitzrovia Area Action Plan – this responds to the significant pressure for development in this area and co-ordinates development proposals across a number of significant sites. It was adopted by the Council in 2014.
- 1.6 Euston Area Plan – this provides a single strategic plan to help shape change in the area around Euston Station up to 2031. It seeks to ensure that if the HS2 high speed rail link goes ahead, we can secure the best possible future for the residents, businesses and visitors to Euston. It was prepared jointly by Camden Council, the Greater London Authority and Transport for London and was adopted by the Council in 2015.
- 1.7 Fortune Green & West Hampstead and Kentish Town Neighbourhood Plans – these set out the communities visions for the designated neighbourhood areas and a range of planning policies to be used alongside the Council's policies when making planning decisions in these neighbourhood areas.
- 1.8 Local Plan Policies Map – this sets out the adopted policies (from all the development plan documents) geographically and shows key sites for development and the planning areas where the policies apply.
- 1.9 North London Waste Plan – this is being prepared jointly by seven North London waste planning authorities - Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. It will identify, when approved, a range of suitable sites for the management of all North London's waste up to 2031 and include policies and guidelines for determining planning applications for waste developments.

### Neighbourhood plans

- 1.10 Communities can now influence the future of their local areas by preparing a neighbourhood plan that sets out their vision for the area and general planning policies to guide development. Neighbourhood plans are led and written by the community, not the Council. They have to be in line with the overall strategic approach in Camden's existing adopted plans and national policy.
- 1.11 A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. When adopted, a neighbourhood plan becomes part of the development plan and will be taken into account alongside the Council's other plans when making decisions on planning applications in that area.
- 1.12 Many communities in Camden are engaged in neighbourhood planning, and the following areas were formally designated neighbourhood forums at the time of writing: Fortune Green and West Hampstead, Kentish Town, Highgate, Somers Town, Dartmouth Park, Camley Street, Hampstead, Redington and Frogna, Mount Pleasant, Kilburn and Church Row and Perrins Walk.



### Other planning guidance

1.13 The Council has prepared a number of other documents that provide advice and guidance on how our planning policies will be applied for certain topics, areas or sites known as Supplementary Planning Guidance (SPG). These documents do not have the same weight in decision making as Camden development plan documents but they are important supporting documents. They are available on the Council's website and include:

- Camden Planning Guidance (CPG);
  - CPG1: Design
  - CPG2: Housing
  - CPG3: Sustainability
  - CPG4: Basements and lightwells
  - CPG5: Town centres, retail and employment
  - CPG6: Amenity
  - CPG7: Transport
  - CPG8: Planning obligations
- Conservation Area Appraisals and Management Strategies; and
- Planning frameworks and briefs.

1.14 Full details of these documents can be found on the Council's website.

### Preparing the Local Plan

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

1.16 The NPPF includes a 'presumption in favour of sustainable development'. It states that for plan making the presumption means that local authorities should positively seek opportunities to meet the development needs of their area and that plans should meet objectively assessed needs. Plans should be based



upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. This Local Plan has been prepared in accordance with the NPPF.

### **London Plan**

- 1.17 Camden's Local Plan and other development plans need to be in general conformity with the London Plan (and approved alterations). The London Plan is the Mayor's planning strategy for Greater London as a whole. It sets borough level housing targets and identifies locations for future growth of London-wide importance.

### **Duty to co-operate**

- 1.18 Plans have to be prepared in accordance with the legal 'duty to co-operate'. The duty to co-operate requires local authorities and other public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of preparation on strategic cross-boundary matters. The Council has engaged with its neighbouring boroughs and other relevant organisations in the preparation of this Plan to meet its duty to co-operate and will continue to work with them where appropriate on the implementation of this Plan.

### **Community involvement in the Local Plan**

- 1.19 The Council carried out initial engagement with residents, businesses and the development industry on the review of its key planning policies in late 2013. The comments received during that initial engagement were taken into account in preparing a 'Draft Local Plan', which was consulted on in early 2015. The comments from the public consultation and engagement together with further updated evidence work fed into the 'Submission Draft' version of the Local Plan. This was submitted to the government for public examination by a Planning Inspector and further comments invited. Public hearings were held in October 2016 and further modifications were consulted on in early 2017. Following the Inspector's report the Local Plan was adopted in July 2017, incorporating the Inspectors recommended modifications.

### **Sustainability appraisal and other assessments**

- 1.20 The Local Plan has been subject to a number of impact assessments, including Sustainability Appraisal (incorporating Strategic Environmental Assessment), Health Impact Assessment, Habitats Regulations Assessment and Equality Impact Assessment. The Sustainability Appraisal assessed the environmental, social and economic impacts of the Plan, including an appraisal of alternative approaches for addressing a range of key Plan issues. The updated Sustainability Appraisal and other impact assessments are published on the Council's website.

### **Evidence to support the Local Plan**

- 1.21 The policies in the Local Plan need to reflect up-to-date and relevant evidence about the social, economic and environmental characteristics and prospects of the area and must meet identified needs in accordance with the National Planning Policy Framework (NPPF). The Council has collected a wide range

of information and studies to support and inform this Plan, including studies on housing need, employment land, retail floorspace, infrastructure and open space, as well as monitoring information. A viability assessment of the policies in the plan has also been undertaken. This evidence can be viewed on the Council's website.

## The challenges we face

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

### **Adapting to Camden's growing population and to social change**

- 1.23 The number of people living in Camden is increasing and the makeup of the borough's population is changing. Key changes include an increasing number of children in the borough and a rapidly growing older population. Responding to changes in the way we live our lives including how we work, shop and spend our leisure time together with how we access services are key challenges for this Local Plan.

### **The supply and cost of housing in the borough**

- 1.24 Many people want to live in Camden but there is a limited supply of homes and prices are high. It is important to ensure that we help keep Camden's social mix and make sure that the borough does not become polarised between wealthy and less well-off residents. We face the challenge of providing a diverse range of housing and ensuring we provide mixed areas with sustainable communities.

### **Maintaining a successful economy and improving opportunities**

- 1.25 Camden has a very successful and diverse economy and it makes a significant contribution to the UK economy as well as being a key part of Central London's economy, with its concentration of businesses, retail and tourism uses. The Council wants to maintain and strengthen Camden's economy and competitiveness, whilst ensuring our communities benefit from this and we keep the borough's special identity. We need to ensure that we fully support our residents and businesses to make the most of the opportunities.
- 1.26 Employment is the biggest factor affecting income inequality and so we need to ensure we get more people into work and help them to develop their careers in the long-term. This can be supported through a range of measures, including helping people into work or training and using links with businesses.

### **Inequalities**

- 1.27 The success of Camden's economy is not shared by all. The borough has some of the most deprived neighbourhoods as well as some of the most prosperous. There are also significant health inequalities in the borough. The Council wants to ensure that members of our community have access to good housing, jobs, skills, training and education, public transport and health and community facilities to help promote equality and inclusion, to ensure that everyone has the opportunity to succeed and nobody gets left behind. Achieving strong and resilient communities is a key challenge.

### Health and wellbeing

- 1.28 Camden has one of the largest health inequality gaps in England and people suffering from poor health are generally concentrated in some of the borough's most deprived wards. Addressing these inequalities and improving Camden's health and wellbeing, both physical and mental, goes beyond improving access to medical facilities and includes a range of measures to improve our social and physical environment.

### Improving transport

- 1.29 Camden benefits from some of the best transport accessibility in the country. It is well served by bus, tube and rail, providing links within London, to other parts of the country and to Europe. We need to ensure that, with the projected rise in numbers of people living in, working in and visiting the borough, people can move around easily. Road traffic can harm local air quality and, through this, the health of those living in the area. We want to continue to promote travel that is easy, safe, healthy and does not harm our local environment or contribute to climate change.

### Quality of the environment

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

### Crime and safety

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

## Vision and objectives

1.32 The Council's vision for the borough is set out in the Camden Plan. The overall vision of the Camden Plan also acts as the vision for this Local Plan:

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

1.33 This Local Plan is a key delivery mechanism for the Camden Plan and other Council strategies including the Joint Health and Wellbeing Strategy. Key Council objectives are to:

- provide democratic and strategic leadership fit for changing times;
- develop new solutions with partners to reduce inequalities and improve the physical and mental health and wellbeing of local residents;
- create conditions for and harnessing the benefits of economic growth;
- invest in our communities to ensure sustainable neighbourhoods; and
- deliver value for money services by getting it right first time.

### Strategic objectives

1.34 The Council has developed a series of objectives for the Local Plan to achieve its vision and help deliver the objectives of the Camden Plan. The strategic objectives of the Plan are set out below alongside the Camden Plan objectives and relevant planning policies to show how they will contribute to, and work together to achieve, the objectives.

1.35 The following numbers identify Camden Plan objectives in the table below:

- 1. Developing new solutions with partners to reduce inequality and improve health and wellbeing
- 2. Creating conditions for and harnessing the benefits of economic growth
- 3. Investing in our communities to ensure sustainable neighbourhoods

Strategic objectives	Camden Plan objectives	Local Plan policy
1. To create the conditions for growth, ensuring it takes place in the most appropriate and sustainable locations and minimises the impacts of development, and to harness the benefits of this growth so it meets the needs of Camden's communities for homes, jobs and services and preserves and enhances the borough's unique character and appearance.	1, 2, 3	G1 H1, H2, H4, H6, H7, E1, A1, A2, D1, D2, CC1, TC1, T1.
2. To secure safe, socially mixed and balanced areas with strong, cohesive and resilient communities to help reduce inequality in the borough, while supporting the provision of the accessible facilities and services needed to meet community needs.	1, 2, 3	G1, H1, H2, H4, H5, H6, H7, H8, H9, H10, H11, C1, C2, D1.
3. To provide homes that meet the housing needs of existing and future residents in terms of number, affordability, quality, type of property and mix of dwelling sizes. Self-contained housing is the priority use of the Local Plan.	1, 3	G1, H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11.

<b>Strategic objectives</b>	<b>Camden Plan objectives</b>	<b>Local Plan policy</b>
4. To strengthen Camden's nationally important economy, in terms of business and employment, the knowledge economy, shopping and entertainment, culture, entertainment and tourism, and to secure benefits for local people to reduce inequalities in the borough through increased access to jobs, skills, training and education opportunities, ensuring nobody gets left behind.	1, 2, 3	E1, E2, E3, TC1, TC2.
5. To support the existing and future successful development of our town and neighbourhood centres and the retail areas in Central London, while adapting to changes in their role and how people shop.	2, 3	TC1, TC2, TC3, TC4, TCR, TC6, G1.
6. To promote and support the successful development of the growth areas of King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead, Kentish Town Regis Road and Central London and to ensure that all development is supported by necessary infrastructure and maximises the opportunities and benefits for the local and surrounding communities and the borough as a whole.	1, 2, 3	G1, D1
7. To promote high quality, safe and sustainably designed buildings, places and streets and preserve and enhance the unique character of Camden and the distinctiveness of our conservation areas and our other historic and valued buildings, spaces and places.	1, 2, 3	D1, D2, A1, CC1, CC2, CC3.
8. To promote sustainable transport for all and to make Camden a better place to cycle and walk around, to reduce air pollution, reliance on private cars and congestion and to support and promote new and improved transport links.	3	T1, T2, T3, T4.
9. To make sure that development in Camden minimises its energy use by encouraging local efficient energy generation, achieving the highest possible environmental standards, and is designed to adapt to, and reduce the effects of, climate change.	3	CC1, CC2, CC3, CC4, CC5, D1
10. To improve and protect Camden's Metropolitan Open Land, parks and open spaces, and protect and enhance biodiversity, in addition to providing for new habitats and open space.	2, 3	A2, A3
11. To improve health and wellbeing of Camden's population and reduce health inequalities through good spatial planning, supporting healthier lifestyles and environmental improvements, as well as ensuring appropriate access to health facilities.	2, 3	C1, C2, C4, A2, CC1, CC2, CC4, A1, A3, D1, T1.
12. To promote and protect the high levels of amenity and quality of life that makes Camden such an attractive, successful and vibrant place for residents, workers and visitors.	3	D1, A1.
13. To reduce, plan for and manage Camden's waste, including by working with our partner boroughs in the North London Waste Authority area, to work towards self- sufficiency within London.	2, 3	CC5

## 2. Growth and spatial strategy

## Delivery and location of growth

- 2.1 Camden, along with London as a whole, is experiencing significant change, with substantial population growth and increases in demand for housing and employment.
- 2.2 The Council's objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. This plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.

### Policy G1 Delivery and location of growth

The Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

#### Delivery of growth

The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:

- a. supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;
- b. resisting development that makes inefficient use of Camden's limited land;
- c. expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and
- d. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Growth in Camden will be expected to help contribute towards achieving the strategic objectives of the Local Plan and help deliver the Council's priorities set out in supporting text below.

This Plan seeks to meet Camden's objectively assessed needs to 2031 for:

- 16,800 additional homes (see Policy H1 Maximising housing supply);
- 695,000sqm of office floorspace (see Policy E1 Economic development); and
- c30,000sqm of retail floorspace (see Policy TC1 Quantity and location of retail development).



### Location of growth

Development will take place throughout the borough with the most significant growth expected to be delivered through:

- e. a concentration of development in the growth areas of, King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road;
- f. development at other highly accessible locations, in particular Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead; and
- g. the Council's Community Investment Programme (CIP).

The Council identifies and provides guidance on the main development opportunity sites in the borough through our Camden Site Allocations and Area Action Plans.

The Council will require development in the growth areas, other highly accessible and CIP areas to be consistent with the area priorities and principles set out below.

## Overall growth and approach to development

- 2.3 Camden is forecast to grow from 229,700 (in 2013) to 265,300 people by 2031<sup>1</sup>. That is nearly 2,000 additional people per year. In the same period the forecasts indicate that the number of households will grow by 19,200 or nearly 1,100 per year. Population growth creates the needs for more services, more school places and more jobs. Currently the number of jobs in Camden is forecast to grow from 286,000 to 375,000 by 2031<sup>2</sup>.
- 2.4 Camden is a suitable, attractive and sustainable place for growth with its high quality places and excellent transport connections giving it high levels of accessibility. We recognise, however, that there is limited land in Camden to accommodate this growth and so there is a need to use Camden's land more efficiently to ensure that it delivers the objectives of this plan and the priorities set out below.

### Harnessing the benefits of growth

- 2.5 All development in Camden, large or small, wherever it is located should take place in accordance with all relevant policies of this Local Plan and other documents that form part of Camden's development plan, in order to deliver the Council's vision and objectives for the borough. The Council will seek to support and facilitate growth that delivers the development appropriate to its location and harnesses this growth to deliver clear benefits for Camden residents and businesses.
- 2.6 Key priorities for delivering growth and harnessing its benefits include but are not limited to:
- securing self-contained housing as the priority use of the Local Plan, including sufficient affordable housing to meet the needs of our residents

<sup>1</sup> GLA 2014 Round 'Camden Development' Capped Average Household Size (March 2015)

<sup>2</sup> Camden Employment Land Review 2014

and to ensure that Camden remains a place accessible for all people to live in. Please see paragraph 3.6 on page 43 for the definition of self-contained housing and policies H1 - H11 on housing for further detail on our approach;

- supporting businesses and job provision by providing or retaining suitable premises to support businesses staying or expanding within Camden. Alongside this we will seek to deliver training, apprenticeships or qualification opportunities for our residents to allow them to be able to benefit from these jobs. Please see the policies E1 and E2 for more detail;
- securing the infrastructure and services to meet the needs of our growing number of residents, workers and visitors. We have identified our infrastructure needs in the schedule in Appendix 1. This includes transport, utilities, education, health, open space, emergency services needs and digital infrastructure requirements. Please see Policy DM1 Delivery and monitoring for more detail on our approach to infrastructure provision; and
- ensuring that growth is delivered in a way that protects amenity. Camden's high level of amenity (the features of a place that contributes to its attractiveness and enjoyment as a place to live) is a major part of successfully promoting and managing growth in Camden. We will require developments to avoid harmful effects on amenity of existing and future occupiers and nearby properties, or where possible, to take appropriate measures to minimise potential negative impacts. More detail and guidance on our approach to amenity is contained in Policy A1 Managing the impact of development.



## Delivering growth

### Making the most of our limited land

- 2.7 We will promote the most efficient use of Camden's land and buildings while also seeking to improve the quality of our environment, protect the amenity of occupiers and neighbours and meet its other planning objectives. It is important that development delivers not only homes, but also employment space together with the services and facilities that are needed to maintain and create healthy and sustainable communities where nobody gets left behind and everyone has a chance to succeed.

### Density

- 2.8 The Council wants to encourage high quality developments with high densities (i.e. the most homes or rooms that can appropriately be delivered in a given site area) to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of the borough (generally, the growth areas, Central London and town centres of Camden Town, Finchley Road / Swiss Cottage, Kilburn High Road, and West Hampstead).
- 2.9 The Council will expect the density of housing development to take account of the density ranges set out in the London Plan's Sustainability Residential Quality density matrix (Table 3.2) and will refer primarily to dwelling densities measured in units per hectare. As Camden is generally well served by public transport, the Council will generally expect densities towards the higher end of the appropriate density range in the matrix, subject to taking into account all aspects of local character including heritage assets, protected views and open spaces and having regard to the boroughs acute housing needs. Further detail on our approach to density is set out in Policy H1 Maximising housing supply.
- 2.10 Tall buildings are one form of high density development that can be appropriate for some uses and in some locations, subject to excellent design, protection of strategic views, good public transport accessibility and consideration of the impact on the surrounding area. Further detail on our approach to tall buildings is set out in Policy D1 Design.
- 2.11 Good design can increase density while protecting and enhancing the character of an area (Please see Policy D1 Design and Policy D2 Heritage for more detail on our approach to design and heritage). All development should be of excellent design quality and should sensitively consider the amenity of occupiers and neighbours and, particularly in conservation areas, the character, heritage and built form of its surroundings.



### Mixed use developments

- 2.12 The provision of an appropriate mix of uses, both within areas and in individual buildings, can also contribute to successfully promoting future growth in Camden and making efficient use of its limited land. A mix of uses can:
- increase the provision of much-needed housing;
  - promote successful places that have a range of activities and are used throughout the day, increasing safety and security;
  - reduce the need to travel by locating a range of uses together and so reduce the need for some journeys, helping to cut congestion in the borough and improve air quality.
- 2.13 The Council will encourage the provision of a mix of uses in suitable locations and expect development proposals of an appropriate size in growth areas, Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage and Kilburn High Road to contribute towards meeting Camden's pressing need for self-contained housing (see Policy H2 Maximising the supply of self-contained housing from mixed-use schemes for further guidance on mixed use). This reflects the designation of self-contained housing as the priority land use of the Plan (see Policy H1 Maximising housing supply for maximising the supply of self-contained housing). The Council's Site Allocations document and Area Action Plans identify development sites and provide guidance for their future development, including where mixed use development is appropriate.

### Multi-site proposals

- 2.14 In certain circumstances there may be demonstrable reasons why greater benefit could be achieved to the overall objectives of this plan through considering development proposals across a number of sites, rather than as individual schemes. For example, it may be that more affordable homes, open

space or community facilities could be delivered or more affordable employment space or training and apprenticeships could be secured through such an approach.

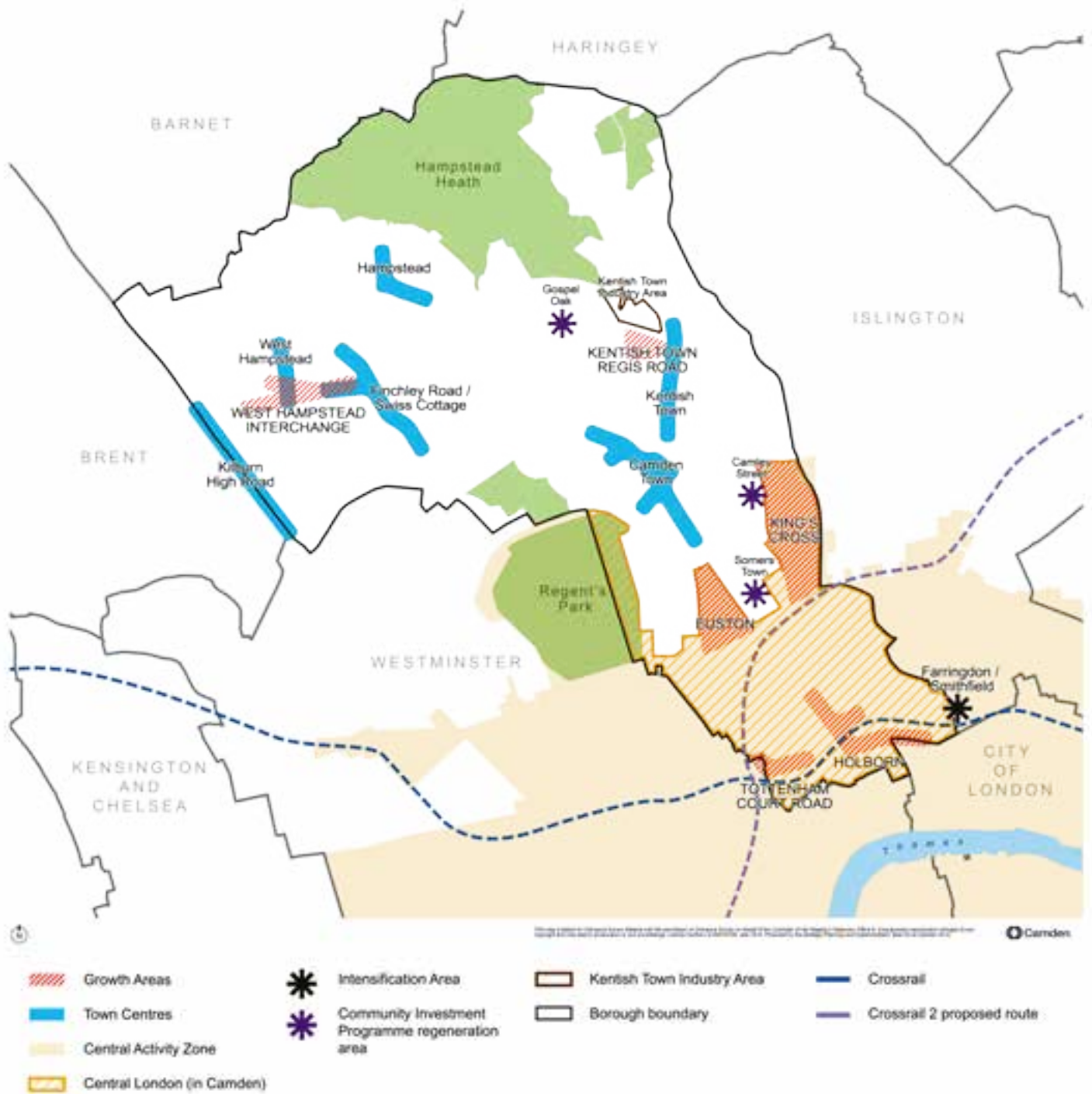
- 2.15 Therefore, where appropriate to secure public benefits, the Council will consider assessing compliance with the policies in this plan across a number of linked sites. Multi-site proposals should be planned in a coordinated manner and demonstrate that there is a clear public benefit to this approach. They should have an agreed timeframe and means of delivery for the benefits, secured through a legal agreement.

### **Location of growth**

- 2.16 The Council's overall spatial strategy is illustrated on Map 1: Key Diagram on page 22. This shows the broad locations of Camden's growth areas, town centres, main Community Investment Programme (CIP) areas (where we expect a concentration of development to be located) together with major transport schemes and main open spaces.
- 2.17 Development will also take place across Camden outside of these identified areas, although not at the same scale. Many parts of Camden, particularly in the northern part of the borough are predominantly residential in character. Substantial parts of these are designated as conservation areas, where the Council will seek to preserve and, where possible, enhance their valued character and heritage assets. It is expected that areas outside of those identified in Policy G1 Delivery and location of growth will experience smaller scale development and more incremental change.
- 2.18 The section below provides further detail on the parts of the borough where the most significant growth is expected to take place. As set out in policy G1, the Council will require development in the growth areas, other highly accessible locations and CIP areas to be consistent with the principles and priorities for these areas set out below.



Map 1: Key Diagram



### Growth areas

- 2.19 A significant proportion of Camden's growth up to 2031 is expected to be delivered in the six identified growth areas of King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange, and Kentish Town Regis Road. The first five of these areas are identified in the London Plan as Opportunity Areas or Areas for Intensification.
- 2.20 These areas are identified as being suitable for large-scale redevelopment or significant increases in jobs and homes, and are based around transport interchanges. The majority of these areas are within Central London and therefore their redevelopment will contribute towards the continued success of Central London and to London's national and international role, as well as providing opportunities to bring benefits across the borough and the local area.
- 2.21 The London Plan targets for Camden's growth areas are set out in the table below. The boundaries of the areas are as shown on the Local Plan Policies Map.

### London Plan targets for Camden's growth areas

	Minimum homes 2011-2031	Indicative jobs 2011- 2031
<b>Opportunity Areas</b>		
King's Cross	1,900	25,000
Euston	2,800 - 3,800	7,700 - 14,100
Tottenham Court Road (part in Westminster)	500	5,000
<b>Areas for Intensification</b>		
Holborn	200	2,000
West Hampstead Interchange	800	100

Source: London Plan 2015

### Priorities for growth areas

- 2.22 The Council will expect development in the growth areas to meet the objectives of this plan and the identified priorities below. It should maximise site opportunities and the opportunities and benefits for the borough and the local area, in particular in terms of jobs, homes and facilities for the community, within the context of the full range of Camden's planning policies as set out in this plan and the Council's other planning documents.
- 2.23 Our Camden Site Allocations document and Euston Area Plan also identify significant development opportunities within the growth areas. The identified sites are expected to deliver a significant proportion of the increase in homes and jobs in the growth areas. These documents also set out Council's aspirations for the individual sites in more detail.

- 2.24 It is important to note that the growth areas are next to, and sometimes include, existing residential communities and heritage assets such as conservation areas. Development must therefore take account of its sensitive context. Further details on the specific growth areas and priorities are set out in more detail below.

### King's Cross

- 2.25 King's Cross is the borough's largest development area and is rapidly taking shape as the high density mixed use redevelopment continues to bring life back to the area. Large parts of the site have already been developed, with more new housing and commercial premises becoming occupied all the time. Community facilities including Camden Council offices, leisure centre and library, a new primary school, together with high quality new public squares, play spaces and improved routes through the area all add to the vibrancy of the area. Central St Martin arts college, small business space and the forthcoming Google headquarters add to the creativity of the area. Camden continues to work with the surrounding residential communities to harness the benefits of this major redevelopment and work in partnership with landowners.





2.26

The Council's aspiration for King's Cross is to continue to secure the development of a high quality, successful, attractive, vibrant and safe places with a mix of uses, in particular offices, homes, retail, leisure and community facilities which:

- support and increases the borough's contribution to London's role as a world business, commercial and cultural centre;
- integrate with surrounding areas and communities, economically, socially and physically;
- create significant job and training opportunities for local people and contributes significantly to the regeneration of neighbouring communities;
- help to meet the range of housing, education, social and healthcare needs in Camden and beyond;
- maximise opportunities for walking, cycling and the use of public transport, to and through the area;
- improve community safety and reduce opportunities for crime and antisocial behaviour;
- protect and enhance features and assets of historic and conservation importance; and
- meet the highest feasible environmental standards.

## Euston



- 2.27 The planning policy approach for the Euston Growth Area is set out in the adopted Euston Area Plan (EAP) January 2015. This was jointly prepared and agreed by Camden Council, the Greater London Authority and Transport for London and provides a framework for change in the Euston area over the next 20 years. The EAP seeks to ensure that whether or not the new high speed rail link (HS2) goes ahead we can get the best possible future for the residents, businesses and visitors to Euston. Please see the Euston Area Plan for more detail on the joint aspirations for the area.

## Tottenham Court Road



- 2.28 The Tottenham Court Road growth area includes parts of both Camden and Westminster and is centred around Tottenham Court Road station. Growth here is being supported by the transport enhancements as part of Crossrail due to open in 2018, in addition to upgrades to the Northern Line and ticket hall area. These works will see a significant increase in the number of passengers using this area and improvement of the public realm is a high priority. The London Plan expects a minimum of 500 new homes and 5000 new jobs to be delivered in the growth area. Based on the identified opportunity sites in the Sites Allocations document, the Council expects around 60% of homes and more than half of the jobs to be provided in Camden's part of the growth area, with the

remainder in Westminster. We will continue to work with Westminster, the West End Partnership, and the Road Task Force to achieve our objectives and vision for this area.

2.29

Development within the Tottenham Court Road growth area should contribute to the Council's wider vision and objectives for this part of the borough. Our aspirations include:

- a balanced mix of uses, including housing and affordable housing, significant provision of offices and other employment opportunities, community facilities, and retail to support the Central London Frontages of Charing Cross Road, Tottenham Court Road and the western end of New Oxford Street;
- an excellent public realm, with an improved network of safe and attractive places and routes for pedestrians and cyclists, that successfully links to neighbouring areas (particularly the growth area at Holborn (see below), Covent Garden, Bloomsbury and Oxford Street) and reduces the dominance of traffic in the area, complementing the West End Project transport scheme;
- maximising densities compatible with local context, sustainable design principles and public transport capacity;
- development of the highest quality, as befits this historic area in the heart of London, which preserves local amenity and seeks to enhance and conserve the significance of heritage assets such as the character and appearance of conservation areas; and
- remedying the lack of open space in the area through on-site provision or contributions to assist in the provision of new spaces.



## Holborn



- 2.30 The area is predominantly commercial, with a small residential community focused around Holborn underground station. High Holborn, from New Oxford Street to Holborn Circus, and most of Kingsway are designated as Central London Frontages, recognising their role as a shopping and service centre for workers and residents. Some of the area and much of its immediate surroundings are designated as conservation area. The area lies close to the growth area at Tottenham Court Road (see above).
- 2.31 The Council's aspirations for the Holborn area include:
- provision of a mix of land uses, with offices and housing as the predominate uses; and
  - provision of appropriate retail, food, drink and entertainment and service uses in the area's Central London Frontage in accordance with the supplementary planning document Camden Planning Guidance on town

centres, taking opportunities to introduce ground floor town centre uses where the continuity of the frontage is currently broken;

- development of a decentralised energy network;
- improvements to the street environment, in particular the pedestrian environment to and around Holborn Underground station;
- improved linkages and connections with the City of London, the Tottenham Court Road area and other neighbouring areas;
- making walking and 'way-finding' easier;
- the provision of improved cycling facilities, particularly for visitors;
- working with partners including TfL to relieve congestion at Holborn Underground station, including the Holborn station capacity upgrade;
- appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;
- high quality, sustainable design that respects its surroundings and conserves and enhances the area's heritage assets and wider historic environment; and
- improving community safety, including opportunities for crime and anti social behaviour.

## Kentish Town Regis Road

- 2.32 This growth area is focused around the industrial area at Regis Road and currently is home to a variety of low density industrial and warehousing uses. It offers a significant opportunity to deliver higher density industrial provision as part of a redevelopment scheme that will also deliver a substantial increase in homes and jobs, as well as improve movement around and through the area, reconnecting communities. Redevelopment will only be considered where this is employment-led and part of a comprehensive scheme. The Council will work in partnership with key landowners, the Kentish Town Neighbourhood Forum and other stakeholders to further investigate this opportunity. A planning framework to provide further detailed guidance on the development of the area, including phasing, should be prepared with stakeholder input prior to any planning application.



- 2.33 The Council expects a comprehensive employment-led development at Kentish Town Regis Road that provides a mix of uses, including industry, logistics and other employment uses, housing, community facilities and open space in accordance with Policy E2 Employment premises and sites. The redevelopment must retain existing businesses on the site as far as possible, and in particular industrial and warehouse/logistic uses that support the functioning of the Central Activity Zone (CAZ) or the local economy. The introduction of non-employment

uses should not compromise the operation of businesses on the site. The loss from the area of a business supporting the CAZ or the local economy as part of a redevelopment scheme will only be permitted if it is demonstrated to the Council's satisfaction that relocation would not cause harm to CAZ functions or Camden's local economy.

- 2.34 Other priorities for redevelopment include:
- a significant increase in the number of jobs provided in the area;
  - provision of appropriate employment space for identified growth sectors and small to medium enterprises and start-ups;
  - contributions towards training and apprenticeship opportunities;
  - a significant number of new homes including affordable homes and a mix of types, sizes and tenures; and
  - retaining or re-providing the Council's Regis Road recycling centre in accordance with Policy CC5 Waste.
- 2.35 The overall design of the area must:
- create and reinstate pedestrian and cycling route connections within the site, to the High Street, the transport hubs, other parts of Kentish Town, and between the adjacent communities, in particular Gospel Oak;
  - provide substantial new open space;
  - secure public realm improvements, including at key entrances to the site;
  - provide a car-free development, with parking only provided for disabled people and operational / servicing needs of businesses;
  - protect important local views of Parliament Hill from the railway bridge; and
  - contribute to the development of a decentralised energy network.
- 2.36 Development should be designed to facilitate, and allow links to, any future development of adjacent sites; and opportunities for comprehensive wider development should be fully explored.



## West Hampstead Interchange

- 2.37 The growth area includes sites around the West Hampstead public transport interchange of three stations (served by London Underground, London Overground and Thameslink) and incorporates the land towards the Finchley Road / Swiss Cottage town centre including the O2 car park land. Improving the public transport provision and movement around the area is a key objective for the area and of the Fortune Green and West Hampstead Neighbourhood Plan (2015).



- 2.38 The Council will continue to work with partners in the area including the Fortune Green and West Hampstead Neighbourhood Forum to investigate a range of solutions and ensure that development is coordinated to provide the best outcomes and takes account of the Neighbourhood Plan.
- 2.39 The Council expects developments in the area to contribute to:
- a mix of uses, including substantial new housing (including affordable housing), town centre, employment and community uses, and green / open space (with any substantial new town centre uses located within the



designated Finchley Road / Swiss Cottage town centre part of the growth area);

- improved transport interchange accessibility and capacity and improved pedestrian and bicycle movement and routes;
- a substantially improved street environment around transport facilities, including improved crossing and wider pavements; and
- sustainable and safe design of the highest quality that respects the character and heritage value of West Hampstead; and
- prioritise the use of decentralised energy networks.

## **Farringdon / Smithfield**

2.40 The Farringdon/Smithfield area, which covers parts of Islington, the City of London and the south east of Camden's Central London area at Hatton Garden and the Mount Pleasant site, is included in the London Plan as an Area for Intensification. The London Plan expects a minimum of 850 homes and 2500 jobs at this location between 2011 and 2031. The GLA, the City of London and Islington continue to work together to secure the best outcomes from the expected development, maximise the opportunities arising from the opening of Crossrail and securing improvement for the existing communities in the area.

2.41 Camden will continue to work with these partners, but as there are environmental constraints in Hatton Garden due to its unique character and conservation area status, the amount of development taking place in this part of Farringdon / Smithfield is expected to be limited. Therefore, this location has not been included as one of Camden's main growth areas.

## **Other highly accessible areas**

2.42 Significant elements of Camden's growth will be delivered in highly accessible locations outside the growth areas identified above. Therefore the Council will promote appropriate development in the areas of:

- the rest of Central London; and
- the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, including appropriate edge of centre locations.

2.43 These areas are considered to be generally suitable for a range of land uses, including those that attract a large number of journeys and for high density development that will help deliver growth in Camden.

2.44 The Council will generally expect larger developments in the highly accessible areas to include a mix of uses. However, it is important that all development in these locations is of a size and nature compatible with its site and the character of its surroundings and the wider area. Please see Policy H2 Maximising the supply of self-contained housing from mixed-use schemes for more detail on our approach to mixed use development.

2.45 Camden's highly accessible areas often include, or are adjacent to, residential communities and conservation areas and other heritage assets. Development in these locations must therefore take into account the full range of relevant Plan policies and objectives, in particular those on amenity, design and heritage, sustainability, community safety, open space and transport.



- 2.46 The main development opportunities within the highly accessible areas are identified in the Camden Site Allocations and Fitzrovia Area Action Plan documents which also set out guidance on their future development.
- 2.47 The Council's priorities for Central London and town centres are set out below.
- Central London**
- 2.48 Central London's unique role, character and mix of uses plays an important part in providing the vibrancy, diversity and identity that makes the borough such a popular place. It contains strong residential communities that not only add character, life and diversity to the area but also support its economy and other functions. The residential areas sit alongside and within the major commercial elements. A large part of London's Central Activities Zone (CAZ) falls within Camden and is a major business and employment centre and the main focus of Camden's economy. It contains a significant proportion of the borough's office floorspace, a variety of shopping areas, from neighbourhood centres to specialist retail locations like Covent Garden, and is home to many other uses, including legal, health and professional services, food, drink and entertainment and cultural and tourism uses. It has excellent public transport links, which will be enhanced through the opening of Crossrail in 2018.
- 2.49 The Knowledge Quarter, a cluster of academic, cultural, research, scientific and media organisations large and small, all within a one mile radius of King's Cross, falls partly in Central London.

- 2.50 The attractions of Camden's Central London area mean that development here is expected to take place both in the identified growth areas and at other sites outside them.
- 2.51 We will continue to work with Westminster, and City of London to achieve our objectives and vision for this area and as part of the West End Partnership to help deliver the overall vision for the West End.
- 2.52 The Council recognises the unique role, character and challenges of Central London in particular in balancing its economic, social and cultural role and will support and promote the area as a successful and vibrant part of the capital to live in, work in and visit. We will:
- support Central London as a focus for Camden's future growth in homes (including affordable housing), offices, shops, hotels and other uses and ensure adequate infrastructure, including transport, utilities and digital, is in place to support this growth;
  - support the concentration of medical, educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter;
  - support the strategic Central Activity Zone functions;
  - work together with partners to deliver the West End Project, which will transform the area around Tottenham Court Road, boosting business and create new public spaces for the community and visitors to enjoy;
  - seek to ensure that development contributes to London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life;
  - support residential communities within Central London by protecting amenity, promoting improved community safety and supporting community facilities;
  - preserve and enhance the area's historic environment;
  - promote and protect areas of specialist activity, such as the Museum Street area and Hatton Garden and take into account the specific identity of the areas within Central London when taking decisions on planning applications and in relevant initiatives and works;
  - continue to designate Central London as a Clear Zone Region
  - seek to improve the quality of the area's streets and places, the connections and linkages between them and the ease of movement into, around and through, the area;
  - manage the location and concentration of food, drink and entertainment uses and their impact;
  - recognise the importance of appropriate active frontages in attracting footfall through spaces and increasing the sense of safety; and
  - support development in accordance with the guidance contained in the Site Allocations document and Fitzrovia Area Action Plan.

### **Town Centres**

- 2.53 The borough's town centres are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel. They are considered to be suitable

for higher density developments provided that they are of high quality, contribute to the character of the area taking into account conservation areas and other heritage assets and the full range of relevant Council policies and objectives.

- 2.54 Camden Town is identified for a significant amount of additional shopping floorspace over the lifetime of this Plan, in the Camden Retail and Town Centre Study (2013). Hampstead town centre is not considered to be highly accessible by public transport and therefore significant growth is not expected in this area. Please see Policy TC1 Quantity and location of retail development for the Council's strategy for Camden's town centres and shops, including the provision of additional retail floorspace.

### Community Investment Programme

- 2.55 A significant element of Camden's expected growth will take place outside of the identified growth areas and highly accessible areas through the Council's Community Investment Programme (CIP). The programme is Camden's response to the extensive cuts of government capital funding that continue to affect the borough. This is at a time when significant investment is required to improve Camden's schools, children's centres, community facilities and the Council's housing stock. The CIP is ensuring that the Council makes the best use of its property assets through regenerating sites and through selling sites that are now surplus to requirements because they are no longer suitable, underused or expensive to maintain. The CIP is generating funds that would not otherwise be available to reinvest into homes, schools and community facilities for our residents and is making a significant contribution to the Camden Plan.





- 2.56 The CIP is delivering in locations across Camden. It is a good example of where a mixed use and multi site approach is delivering growth and where the benefits of the growth are being harnessed for the good of Camden's residents. The CIP is a long-term programme projected to deliver 3,050 new homes, including both new council housing for rent (450) and replacement council rented accommodation (650), intermediate housing (300) and new and replacement private homes (1,650). The CIP will assist the Council in meeting identified housing need and London Plan targets.
- 2.57 The CIP is a key component of how we are investing in our communities and improving facilities for residents. CIP is investing £117m by 2016/17 in 53 schools and children's centres, improving educational facilities across the borough and creating 420 much needed school places in the north-west of the borough. The CIP is also committed to deliver 9000 sqm of improved community facilities and spaces, provide accommodation for new adult social care services and ensure the homes built are sustainable and energy efficient. The CIP is involving local people in changes to their area, providing opportunities for residents to influence proposals and the designs of developments.
- 2.58 The programme is also creating local employment opportunities by promoting construction contracts to local small businesses and securing apprenticeships and work experience placements, ensuring local people are equipped with the skills needed to move forward into employment.
- 2.59 Schemes are worked up in consultation with the residents and stakeholders. A specific example of this is the 1-30 Camden Street and 67-72 Plender Street Council CIP scheme. This scheme has planning permission for the redevelopment of a former community centre, sports pitch, changing rooms, single storey shops and garages to provide an improved community centre and changing rooms, new open space, 31 market homes and 14 affordable homes, together with replacement shops.
- 2.60 Three of the spatial areas of focus of the CIP are estate and area regeneration work in Gospel Oak, Somers Town and Camley Street. Priorities for these areas are set out below.

### **Gospel Oak**

- 2.61 Gospel Oak, is a predominately residential area comprised of six core estates in the north of the borough. It has been identified as a priority area due to high levels of relative deprivation and significant housing challenges. Poor quality design, overcrowding and the age of buildings means that much of the housing stock is in need of significant investment in order to meet the Decent Homes Standard.
- 2.62 In conjunction with the community, the Council is developing a strategic framework for the area, which will set out the overarching principles for the regeneration of Gospel Oak and guide investment into the area over the short, medium and long-term.

- 2.63 Through community engagement with local residents, businesses and community groups, the following priorities for Gospel Oak have been identified:
- new and improved housing;
  - improved community safety through better street design;
  - greater opportunities for jobs and training;
  - support for local businesses and new enterprises;
  - regeneration of Queen's Crescent through improvements to the street environment and a better mix of market/retail offer;
  - greater legibility throughout the area;
  - better community facilities, that are coordinated and tailored to community needs;
  - new and improved quality open spaces; and
  - primary school expansion to meet the needs of a growing population if required.
- 2.64 The regeneration will focus primarily on improving the quality of housing stock but also offers the potential to create an improved physical environment and enhanced connectivity as well as address a number of social and economic issues. Numerous opportunities have been identified to improve conditions and local facilities. The redevelopment of Bacton Low Rise Estate has already commenced and a range of options are currently being explored with the local community for other estates and areas.

### Somers Town

- 2.65 Located between the two major growth areas of King's Cross and Euston, Somers Town is surrounded by change and there is a need to ensure that the benefits of growth are harnessed for the local area and community. The area is one of the most deprived wards in the country and has a high proportion of socially rented tenants in accommodation in need of investment, above average overcrowded housing and community facilities in need of investment, such as Edith Neville School. The Somers Town Neighbourhood Forum is established for the area and are developing a Neighbourhood Plan. Alongside this, given Camden's substantial land ownership the Somers Town Community Investment Programme has been drawn up to establish whether greater benefit to the community and the Council could be derived from looking beyond the individual site boundaries and at the area as a whole.
- 2.66 Through community engagement with local residents, businesses and community groups, Camden has been working with the community and agreed reinvestment priorities for the area. All current and future projects should be designed to deliver against these agreed priorities:
- Housing
  - Getting about
  - Education and community facilities
  - Open space
  - Community safety
  - Jobs and training
  - Health

- 2.67 By looking at the area strategically, the programme explores opportunities to:
- provide resources to improve the environment for tenants and leaseholders of the Council's housing estates;
  - consider tenure and housing mix strategically across the area;
  - consider the spaces between the buildings and how they work together to create a cohesive, attractive and functional place;
  - cross subsidise development from one site to another ensuring reinvestment across the area to meet the agreed priorities; and
  - engage in a strategic dialogue with the community in relation to issues that affect the wider area.

## Camley Street

- 2.68 The east side of Camley Street, between and Agar Grove and Regent's Canal accommodates mainly industrial, storage and distribution uses, within predominantly single storey premises. Camden owns the freehold of this land, including sites that could be brought forward in the short term, and is currently considering options for its landholdings to facilitate future redevelopment as part of the CIP.
- 2.69 The area around Camley Street is undergoing significant change. Central London is extending northwards with the King's Cross Central development and the emergence of the Knowledge Quarter based around King's Cross/Euston and Camden Town is growing as a creative industries hub. In this changing context, the current employment premises at Camley Street fail to make the most efficient use of land. However, the area is also isolated and relatively inaccessible given its location, and this would need to be addressed alongside change in the area.
- 2.70 The Camley Street Neighbourhood Forum is a partnership between local residents and businesses, and covers the employment uses to the east of Camley Street, along with Elm Village, a residential area to the west. Its vision is "to make our neighbourhood the nicest possible place it can be – to make it an area that's economically vibrant, socially connected, and generally the nicest, greenest, safest place to live and work it can possibly be". The Council will continue to liaise closely with the Forum in order to take forward proposals for Camley Street .
- 2.71 The Council will produce a Vision/ Planning framework, to ensure that growth and change takes place in an integrated and sustainable way, addresses public realm and connectivity issues, and is underpinned by a clear vision and employment strategy. It will also consider how this change could fit in with the wider area, including the relationship with site allocations to the south at 4 St Pancras Way (St Pancras Hospital – Site Allocation no. 6), Bangor Wharf (Site Allocation no. 35), Pratt Street/ Georgiana Street/ Royal College Street (Site Allocation no. 36) and 24 - 58 Royal College Street (Site Allocation no. 37).

2.72

Key emerging priorities for the area include:

- creating a more vibrant, attractive area that builds on its location adjacent to King's Cross Central and close to Camden Town;
- enhanced connectivity and public realm, with more active overlooking of the street at different times of the day;
- creating new public spaces and greening of the street environment; and
- making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and employment floor space.



# 3. Meeting Housing Needs

## Maximising housing supply

- 3.1 Policies in this section set out targets for the overall numbers of additional homes and additional affordable homes we expect to be built in the borough over the Plan period, and the mix of sizes and types of homes that are needed for particular groups of people. However, a wider range of considerations feed into creating a high quality housing development, including sustainability, energy efficiency and responsiveness to climate change, residential amenity, the standard of design, layout and construction, adequacy of storage space including parking for cycles, integration with the surrounding area, contribution to the character of the neighbourhood, health, wellbeing, community safety, and the availability of local facilities and public transport. Living in satisfactory housing conditions is a key element of quality of life. As well as shelter a home should provide a place for rest, relaxation, safety, privacy and to raise a family. The Council aims to champion innovative architecture and high quality design to ensure that all these considerations are addressed. We believe that a well-designed built environment will help to inspire pride in Camden as a place to work and live.
- 3.2 Policy H6 Housing choice and mix sets out the Council's intention to seek a wide variety of high quality homes suitable for Camden's existing and future households. The Council will attach equal weight to the quality and quantity of new homes proposed in the borough and will not sacrifice housing quality in order to maximise overall housing supply.



- 3.3 Housing proposals should be designed having regard to:
- relevant policies throughout the Plan, particularly Protecting amenity, Design and Heritage, Sustainability and climate change and Transport;
  - our supplementary planning documents, known as Camden Planning Guidance, particularly Camden Planning Guidance on Design, Housing, Sustainability, Amenity, and Transport;
  - Supplementary planning guidance (SPGs) issued by the Mayor of London; and
  - Building for Life - the industry and government endorsed standard for well-designed homes and neighbourhoods.
- 3.4 Most policies in this section are preceded by guidance on the scope of the policy. This guidance should not be regarded as providing detailed definitions or accounts of the legal position. Planning use classes are set out in The Town and Country Planning (Use Classes) Order 1987 (as amended). Provisions relating to licensing of some types of housing are set out in the Housing Act 2004 and related secondary legislation.
- 3.5 This section of the Plan relates to all forms of housing where people live long-term, including:
- self-contained houses and flats (as defined in paragraph 3.6 on page 43);
  - live/ work units (homes with a dedicated work area) – we will treat them as self-contained homes for the purposes of Local Plan policy;
  - houses, flats, hostels and student halls shared by multiple occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities;
  - nursing homes, care homes and parts of hospitals where people live long-term, such as nurses' accommodation;
  - plots provided to people wishing to build their own homes;
  - accommodation for Camden's established traveller community; and
  - residential accommodation that is ancillary to another use, such as a living area attached to a business and used by caretakers or other staff.
- 3.6 Self-contained houses and flats are defined as homes where all the rooms, including the kitchen, bathroom and toilet, are behind a door that only one household can use (2011 Census Glossary of Terms). In most cases these homes fall in Use Class C3, however the Council will also regard the following as self-contained homes when applying Local Plan policies and monitoring housing delivery:
- self-contained homes provided in conjunction with another use, notably live/ work units (homes with a dedicated work area), which are usually considered to be sui generis (in a class of their own); and
  - small houses in multiple occupation (Use Class C4), which can change to Use Class C3 without a planning application under the freedom provided in legislation. Where the freedom to change to Use Class C3 has been removed (e.g. by a planning condition), the Council will regard small houses in multiple occupation as non self-contained housing.

- 3.7 Accommodation where people stay for short periods is covered elsewhere in the Plan. Specifically:
- hospitals and care facilities where patients and staff are only present on a temporary or working-hours basis are covered by Policy C2 Community facilities; and
  - hotels, serviced apartments and hostels aimed at tourists and backpackers are covered by Policy E3 Tourism.

### **Policy H1 Maximising housing supply**

The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.

We will seek to exceed the target for additional homes, particularly self-contained homes by:

- a. regarding self-contained housing as the priority land-use of the Local Plan;
- b. working to return vacant homes to use and ensure that new homes are occupied;
- c. resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for housing; and
- d. where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.

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

### **Camden's housing needs and targets**

- 3.8 The National Planning Policy Framework (NPPF) requires the Council to plan to meet the full objectively assessed needs for housing in the area. The London Boroughs of Camden and Islington have been identified as a lower tier housing market area for the purposes of satisfying the NPPF requirements, and the two authorities have jointly commissioned an assessment of housing needs (Strategic Housing Market Assessment or SHMA). The assessment shows that Camden's full objectively assessed housing need for 2016-2031 is 16,800 additional homes, or 1,120 homes per year. This overall need includes the homes needed to meet the needs of different groups within the community, including families with children and people with disabilities.
- 3.9 The Council produces an Authority Monitoring Report (AMR) each year which separately monitors the overall delivery of additional homes and different



types of homes each year (self-contained homes, student housing, other non-self-contained homes and long-term vacant homes returned to use). The AMR also contains a housing trajectory which shows how we will continue to deliver self-contained homes and non-self-contained homes and measures Camden's anticipated performance against targets. The Council has produced a new housing trajectory to show how the Plan will meet the full objectively assessed housing need, and this is included in the Local Plan as Appendix 2. In accordance with the NPPF, the trajectory adds a 5% buffer to housing targets during the first five years, which is moved forward from later years. The trajectory therefore adopts an annual target of 1,176 additional homes for the period 2016/17 to 2020/21, and an annual target of 1,092 for the period 2021/22 to 2030/31.

- 3.10 The housing trajectory indicates that there are sufficient identified sites in place to provide just over 17,100 additional homes from 2016/17 to 2030/31 and exceed our housing targets throughout the Plan period. Deliverable sites are in place to provide more than 7,100 homes from 2016/17 to 2020/21, approximately 1,420 additional homes per year, comfortably exceeding the target of 1,176 per year (deliverable sites are sites that are suitably located, viable and available to develop now, and that have a realistic prospect of delivery within five years). Over the first 10 years of the Plan period, the trajectory indicates that developable sites have been identified to deliver an average of around 1,150 additional homes per year, and over the entire plan period identified sites should deliver just under 1,140 additional homes per year (developable sites are sites that are suitably located and have a reasonable prospect of being viable and available to develop at the time envisaged).



- 3.11 We will update the housing trajectory regularly to take into account new sources of supply and maintain a five-year supply of deliverable sites together with a 5% buffer, and will publish the updated trajectory in future Authority Monitoring Reports.

### Conformity with the London Plan

- 3.12 The London Plan 2015 estimates the need for additional homes across London as at least 49,000 per year, calculated on the basis of household projections from 2011 to 2035 together with existing housing needs and further needs arising from undersupply of housing from 2011 to 2015. Based on the supply of land across London and its capacity to deliver additional homes, the London Plan also sets out a minimum target of 42,000 additional homes per year across London up to 2025, and minimum monitoring targets for each borough.
- 3.13 The minimum London Plan monitoring target for Camden is 8,892 additional homes from 2015-2025, or 889 per annum. Boroughs are advised that they should seek to achieve and exceed the minimum target, and set higher Local Plan targets to close the gap between London's housing need and capacity in line with the NPPF. Camden's target of 1,120 additional homes per year is therefore in conformity with the London Plan requirements for housing targets.
- 3.14 The London Plan disaggregates the overall monitoring target into housing supply arising from development ('conventional supply') and increases in housing supply arising from vacant homes returning to use. Targets for vacant homes returning to use are based on the number that would need to return to use each year over a 10-year period to reduce the proportion of the long-term vacant homes to 0.75% of total stock. For Camden the target is 32 homes per year, or 480 homes in total extended across the Local Plan period, and the Council will use this 15-year target for the purposes of monitoring the Local Plan.

### Maximising housing supply

- 3.15 As noted in paragraph 3.12, the London Plan 2015 indicates that the number of additional homes needed across London exceeds the identified capacity for additional homes by at least 7,000 per year. The London Plan also indicates that on the basis of short-term trends, the capital's need for housing could be as high as 62,000 homes per year, 20,000 more than the identified capacity. Consequently, there is a need for all London boroughs to maximise housing delivery.
- 3.16 Similarly, the London Plan sets a minimum monitoring target for Camden of 889 additional homes per annum based on capacity, over 200 homes short of Camden's full objectively assessed need. As indicated in paragraphs 3.10 and 3.11, the Council considers that additional capacity is available in the borough to meet the assessed need. However, meeting needs in Camden will still be challenging. Analysing short-term trends rather than long-term trends, the GLA has projected a potential increase in the number of Camden households by as many as 1,270 each year, compared with our target of 1,120 additional homes per year. To meet Camden's housing needs as far as possible the Council will therefore seek to ensure that all available sites deliver as much additional housing as possible.



### The target and priority for self-contained homes

- 3.17 The 2011 Census indicated that Camden has over 220,000 usual residents. Of these, almost 8,000 live in communal establishments, and just under 5,400 live as separate households in shared dwellings. Over 90% of Camden's usual residents live in self-contained homes as part of a household or as single person households (self-contained houses and flats are defined in paragraph 3.6 of the Local Plan). Usual residents of self-contained homes include 40,000 people living in multi-adult households such as groups of friends and flat-shares (18% of all usual residents). In many cases these residents are not related to the other occupiers of their home, so although they currently live in self-contained homes they could potentially live in non self-contained housing in the future.
- 3.18 Self-contained homes have the greatest potential to provide for a variety of household types with a reasonable standard of privacy and amenity. They generally have the space and flexibility to provide for people whether they are young or old, single people (often sharing), couples or families, and disabled people or people who need a carer for certain activities or overnight. Non self-contained housing with shared facilities is generally aimed at a particular group or household type (e.g. students or single people). This accommodation can be the best way of tailoring facilities or support to suit the characteristics of a particular group, but provide less flexibility for alternative occupiers and can create a greater risk of conflict between people with different cultures and lifestyles.
- 3.19 The London Plan does not disaggregate housing monitoring targets into self-contained homes and non self-contained housing. However, the targets were based on the London Strategic Housing Land Availability Assessment (SHLAA)



2013, which derived borough targets from separate assessments of capacity for the two housing types. Capacity for self-contained homes was based on the assessed capacity of potential sites across London measuring 0.25 ha or more along with local plan allocations, the pipeline of developments of self-contained housing with planning permission, and past rate of delivery from sites of under 0.25 ha.

- 3.20 The London SHLAA assessed Camden's capacity for additional self-contained homes from 2015-2025 as 3,935 homes from sites of 0.25 ha or over and 3,489 from smaller sites, or 7,424 in total. We have converted this assessment of capacity into a specific target for self-contained homes in Camden, which will be used for the purposes of monitoring the Local Plan. Camden's annualised target for additional self-contained homes is 742 homes per year, extrapolated to 11,130 homes over the 15-year Local Plan period.
- 3.21 Camden and other parts of Central London have experienced large growth in student numbers in recent years, accompanied by pressure for substantial increases in the amount of purpose-built student housing. The 2011 Census indicated that over 25,000 full-time students aged 18 or over were resident in Camden during term-time, or 11.4% of the usual resident population, compared with approximately 17,400 in 2001 (or 8.8% of residents). On the basis of development from 1999-2012, the London Plan states that 57% of additional student housing has been concentrated in the four Central London boroughs of Islington, Tower Hamlets, Southwark and Camden.
- 3.22 Student housing has become an increasingly popular development option as an alternative to self-contained housing because student housing has benefited from increasing rents, low vacancy rates and the absence of any conventional affordable housing requirements. Given these concerns we have specifically identified self-contained housing and the Plan's priority land-use (self-contained houses and flats are defined in paragraph 3.6 on page 43). In Camden, 1,200 additional student bedrooms were completed in 2013/14 alone (compared with close to 400 additional self-contained homes). Concerns have emerged across Central London that development of self-contained homes could be severely squeezed by proposals for new student housing. The London Plan therefore advises that Local Plans should address student housing requirements without compromising capacity for conventional homes, and encourages a more dispersed distribution of future provision.
- 3.23 Given these concerns we have specifically identified self-contained housing as the Plan's priority land-use. We have set out a minimum target for student housing in Policy H9 Student housing, but we will also seek to ensure that there is sufficient land available to meet Camden's need for additional self-contained homes. The existing stock of self-contained homes in Camden includes many different types of homes in several tenures, and similarly the Plan's priority land-use encompasses self-contained homes from the affordable, owner-occupied and private rented sectors.

### **Ensuring homes are occupied**

- 3.24 In October 2013, almost 1,300 homes in Camden had been vacant for 6-months or more, approximately 1.3% of the borough's housing stock, compared with 0.6% across London. An element of vacancy in the housing stock is inevitable,





reflecting homes in the process of renovation or changing hands. The 2013 London Strategic Housing Land Availability Assessment has derived The London Plan targets on the basis that the long-term vacancy rate should not exceed 0.75% of the housing stock.

- 3.25 The London Plan sets a monitoring target for 32 long-term vacant homes in Camden to return to use each year. Given the pressure on the housing stock, returning vacant homes to use is a high priority, and the Council will seek to exceed the London Plan monitoring target. The Council currently discourages long-term vacancies by charging the maximum rate of 150% Council Tax on homes vacant for 2 years or more. We also employ empty property officers to work with owners, ensuring homes are in a suitable condition for occupation and matching them up with tenants. The Council will seek to apply Local Plan policies flexibly where this is appropriate to enable refurbishment of a property that would otherwise remain vacant.
- 3.26 There is some evidence that an increasing proportion of homes in and around Central London are bought by investors who do not live in them or rent them out. The Mayor is seeking to address this by encouraging developers to sign up to his New Homes for Londoners Concordat which commits them to making homes in their developments available for sale to Londoners before, or at the same time as they are available to buyers from other countries. The Council will explore using legal agreements to ensure that homes are marketed and available for sale in Camden for at least two months before they are marketed more widely. The Council will also explore further ways to ensure that investment homes are made available for occupation, for example by encouraging new owners to use our pilot local letting agency Camden Homes.

More details of measures to encourage occupation and discourage vacancy will be included in supplementary planning document Camden Planning Guidance on Housing where appropriate.

### **Resisting alternative development of identified housing sites**

- 3.27 Where possible, we have identified underused sites that are suitable for additional self-contained housing or another form of housing in our development plan, and will resist an alternative use of allocated sites. However, a high proportion of the housing developments that come forward in Camden are not identified in advance because they are small sites, or were in use when sites were assessed for allocation. Given the high proportion of potential housing sites in the borough that cannot be identified in a development plan document, the Council may also resist alternative development of other sites that have an existing consent for self-contained housing or another form of housing (an existing consent is one that has not expired, or remains effective because development has been started).
- 3.28 If alternative development is proposed on a site identified for self-contained housing, we will consider whether there is a reasonable prospect of a viable development for self-contained housing coming forward within the Plan period, and any other relevant material considerations such as whether the alternative development will free up a replacement site in Camden for self-contained housing, or provide an essential community facility or infrastructure that cannot be accommodated elsewhere.
- 3.29 The Council will generally treat live / work units in the same way as housing for the operation of development policies. Such premises contribute to the range of homes and the range of business premises in the borough, and the Council will not resist the development of live - work premises on sites that are considered suitable for housing provided that they include an appropriate mix of dwelling-sizes and types in accordance with other policies including H4 and H7. Further information on our approach to live-work premises is provided in the section of the Plan dealing with the economy and jobs.

### **Making the best use of sites to deliver housing**

- 3.30 Where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for housing unless:
- the Plan seeks to protect existing uses on site, such as business premises, community uses and shops;
  - the site is needed to meet other plan priorities for the area, particularly in the Hatton Garden area and other parts of Central London;
  - the site is identified for another use in our development plan documents; or
  - it is demonstrated to the satisfaction of the Council that a housing development would not be financially viable.
- 3.31 Where non-residential uses are required on the site, the Council will seek mixed- use schemes including the maximum appropriate provision of housing.

More details of our approach to the inclusion of housing in mixed-use developments are set out in Policy H2 Maximising the supply of self-contained housing from mixed-use schemes.

- 3.32 The London Plan's Sustainable Residential Quality density matrix has been developed as a tool to help boroughs seek the maximum appropriate provision of housing on each site while maintaining residential quality, taking account of public transport accessibility, respecting local context and ensuring an appropriate mix of homes of different sizes. To ensure we make the best use of sites for housing, we use the London Plan's density matrix (London Plan Table 3.2) to seek the maximum housing density appropriate to the site (i.e. the most homes or rooms that can appropriately be delivered in a given site area).
- 3.33 Given that the majority of the borough has relatively high public transport accessibility and is suitable for development of flats, densities should be towards the higher end of the appropriate density range, and should generally fall within the cells towards the right and bottom of the matrix, i.e. 45 to 405 dwellings per hectare. This broad range is designed to encompass areas with widely different characters, including low rise terraces, mansion blocks and mixed commercial areas with building heights of four-storeys or more. Where the top end of the range applies a plot can provide nine times as many homes as an equivalent plot where the bottom end of the range applies.
- 3.34 The density matrix should be seen as a guide rather than a prescriptive tool, and will be applied flexibly taking into account all aspects of local character including heritage assets, protected views and open spaces, whilst also having regard to the borough's acute housing needs. To respect local character we will expect developers to explore whether increased density can best be achieved through the use of medium rise development and traditional urban forms rather than focussing only on high rise options. We will also recognise that it may be appropriate to exceed or fall below the relevant density range on certain sites where this is justified by context and form of the development.
- 3.35 When using the London Plan density matrix, the Council will refer primarily to dwelling densities, measured in units per hectare. The London Plan density matrix assumes that the number of habitable rooms per dwelling will average between 2.7 and 4.6. However, there is a significant market in Camden for very large homes that have many more rooms than occupiers. Developments including dwellings with significantly more than 5 habitable rooms may give inconsistent results against the density matrix, showing an appropriate density in terms of habitable rooms, but an inappropriately low density in terms of dwellings. Assessing density in terms of units per hectare will help the Council to seek a range of dwelling sizes that supports mixed and inclusive communities and help us to avoid concentrations of very large homes.

### **Flexible implementation**

- 3.36 Despite the financial crisis of 2007-08, house prices in Camden had recovered to 2007 levels by mid-2010 and have continued to rise. The Council is currently receiving applications for a high level of residential development, with permission granted in 2013-14 for over 850 additional self-contained homes. This suggests that developers expect continued increases in Camden's house prices.

- 3.37 However, the viability of housing development has not fully recovered from the financial crisis. Some sites are constrained by acquisition prices that could not now be supported, lending to developers and to purchasers is more restricted than previously, lenders are less willing to take risks and both lenders and developers expect financial viability assessments to indicate higher profit levels than previously. There is also uncertainty about the future, with expectations that interest rates will rise, concerns about the impact of a rate rise on borrowers, and concerns that current economic growth is fuelled by unsustainable debt.
- 3.38 Given these uncertainties, there is a need to monitor the supply of housing very closely, and make adjustments to the way we implement our Local Plan policies to ensure that our targets for additional homes are met. If overall housing supply appears to be threatened by economic conditions, there are a number of areas of flexibility in the Council's policy approach that will enable us to tailor our objectives to the particular circumstances of each proposal with a view to maximising delivery. These include:
- varying the proportion of market and affordable housing;
  - varying the split between social-affordable rented housing and intermediate affordable housing;
  - positively considering different forms of intermediate affordable housing to take advantage of the funding and credit that is available;
  - varying the range of home sizes sought, particularly amongst market housing; and
  - reviewing the range of Section 106 requirements sought to maintain viability.
- 3.39 In negotiating the range of housing types and sizes on individual sites, including the proportion and range of affordable housing, the Council will have regard to the characteristics and constraints of the site and the area, progress towards meeting Camden's overall housing target, the financial viability of the development, the contribution the development makes to the creation of mixed communities, and the Council's other Local Plan objectives.
- 3.40 In seeking to secure the future supply of additional housing, we will work in partnership with many other organisations and agencies involved in the development and funding of housing and affordable housing. These will include our developers, landowners and private landlords, Housing Associations and other affordable housing providers, the Mayor and the GLA and other local authorities – particularly councils in Central and North London, government departments and government agencies.



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

- 3.41 Policy H2 applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase. Policy H2 also applies to all non-residential uses, including hotels and other visitor accommodation and non-residential institutions. However, a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought.
- 3.42 Policy H2 specifically seeks provision of self-contained houses and flats (Use Class C3), rather than other forms of housing, in line with the priority land-use of the Plan as set out in Policy H1 Maximising housing supply.

### **Policy H2 Maximising the supply of self-contained housing from mixed-use schemes**

To support the aims of Policy H1, where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses.

- In all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development.
- In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations.

In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:

- a. the character of the development, the site and the area;
- b. site size, and any constraints on developing the site for a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. whether the development is publicly funded or serves a public purpose.

Where housing is required as part of a mix of uses, we will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:

- f. the need to add to community safety by providing an active street frontage and natural surveillance;
- g. the extent of any additional floorspace needed for an existing user;
- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- i. 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-let housing; and
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

In the Central London Area and the town centres listed in this policy, where provision of self-contained housing is required but the development's provision of housing falls significantly short of the Council's 50% target due to financial viability, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution. The deferred contribution will be based on the initial shortfall and an updated assessment of viability when costs and receipts are known as far as possible.

- 3.43 Policy H1 indicates that where sites are underused or vacant, we will expect the maximum reasonable provision of housing that is compatible with any other uses needed on the site. Where it is not appropriate to develop a site entirely for housing, securing housing as part of a mixed-use scheme is another way of meeting some of our housing needs whilst also meeting other needs in the area, such as providing jobs, services and facilities. Developing a mix of uses on individual sites and across an area can also be beneficial in other ways, such as:
- reducing the need to travel between homes, jobs and services;
  - increasing community safety and security by providing a range of activities that attract people at different times during the day and evening;
  - contributing to the creation of areas that are diverse, distinctive and attractive; and
  - allowing an efficient use of land, with housing developed above those uses which benefit from direct ground floor access or a street-level frontage, such as shops.
- 3.44 Much of the borough already has a well-established mixed-use character. To support this mixed-use character and the aims of Policy H1, the Council will encourage non-residential development throughout the borough to provide a mix of uses including self-contained housing.
- 3.45 The Council has established detailed requirements for non-residential development in Camden's Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road as these are the parts of the borough which have the best access to public transport, the best potential for a mix of uses, and the best prospect for the development



of housing above active street frontages. Additional housing in these locations will help provide activity and surveillance when businesses are closed, and support shops, services and local facilities. Therefore, the Council will require development schemes in Central London and these larger town centres to provide a mix of uses subject to the considerations set out in Policy H2, and will seek half of all additional floorspace as self-contained housing (in Use Class C3), such that additional floorspace in residential use matches all the additional floorspace in non-residential uses.

- 3.46 For the Central London Area and the specified town centres, Policy H2 provides distinct considerations and criteria used to determine whether a development is required to provide housing as part of a mix of uses, the type of housing required, whether the housing should be provided on site or off site, and achieving an appropriate mix of housing and other uses. The following paragraphs explain these in turn. Further details of the operation of Policy H2 are also set out in supplementary planning document Camden Planning Guidance on Housing.

#### **Whether housing is required**

- 3.47 Proposals for additional non-residential floorspace in the Central London Area and specified town centres will be required to provide housing subject to assessment against criteria (a) to (e) in Policy H2. The Council has set a threshold indicating that the requirement applies to developments adding more than 200sqm (GIA or gross internal area) on the basis of the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development.



- 3.48 The following are examples of proposals that would not be required to provide housing:
- the additional floorspace is 200sqm (GIA) or less;
  - the development is unable to create an acceptable level of residential amenity e.g. inadequate daylight and sunlight, or other activities nearby would cause unacceptable harm to residential amenity e.g. levels of noise and vibration;
  - the development involves an extension to an existing building (especially a listed building or a building that makes a positive contribution to a conservation area) that cannot accommodate new features necessary to support housing, such as entrances, windows, staircases and lifts;
  - the development is in the designated Hatton Garden area, where the Council's priority is to secure and protect a stock of premises for the jewellery sector and support the nationally important cluster of jewellery manufacture and trading that gives the area its special character;
  - the development involves a specialised use, such as a hospital or a research facility, which has operational requirements that prevent the inclusion of housing (e.g. 24 hour activity or a controlled environment); or
  - the development is publicly funded or serves a public purpose (such as providing transport infrastructure, land required for transport, or a dedicated facility for an educational, medical or research institution), and the nature of the funding or facility prevents the inclusion of housing.
- 3.49 Student housing proposed in accordance with Policy H9 Student housing is considered to be residential floorspace and therefore the requirements of Policy H2 do not apply. The Council will not seek the inclusion of self-contained



housing in such proposals unless the site has been identified for self-contained housing through a current planning permission or a development plan document (see Policy H1 Maximising housing supply on page 42).

### **The type of housing required**

- 3.50 Where Policy H2 applies to development, the Council will generally seek self-contained housing (in Use Class C3). This is consistent with the Council's concern that development of student housing may limit the availability of sites for conventional homes in Camden and the specification of self-contained housing as the priority land-use of the Local Plan in Policy H1. However, where education development is proposed to serve an institution supported by the Higher Education Funding Council for England, as an alternative to seeking self-contained housing, the Council may support a mixed-use development including student housing that serves the same institution, subject to the student housing satisfying the requirements of Policy H9.
- 3.51 To ensure that housing provided as part of a mixed use scheme contributes to meeting the targets identified in Policy H1, rather than being used as ancillary space by non-residential occupiers, the homes should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.
- 3.52 Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought. Policy H4 Maximising the supply of affordable housing sets out when we will seek affordable housing, and the quantity and type of affordable housing we expect.

### **Whether the housing should be provided on-site or off-site**

- 3.53 Inclusion of self-contained housing on-site as part of a mixed use development offers the best prospect for achieving the benefits set out in paragraph 3.43 and creating a complementary range of activities across an area with continuous activity and natural surveillance. Where the Council considers that provision of housing is appropriate, we will seek provision on the development site. Where development adds 1,000sqm (GIA) or more floorspace, the Council considers that it will generally be possible to achieve a significant number of homes on-site sufficient to support the stairs, lifts and circulation space needed to serve them, and will therefore particularly expect on-site provision .
- 3.54 There may be circumstances (even when the additional floorspace is 1,000sqm or more) where housing cannot practically be achieved on-site or would more appropriately be provided off-site (for example where the entire additional floorspace is needed for an existing user). Relevant considerations are set out in paragraphs 3.56 to 3.65. Where the Council considers that off-site provision is appropriate this will be secured through a planning obligation. There is intense competition for development sites in Camden, which creates a risk that no site will become available for delivery of the housing if it cannot be identified by the time the non-residential application is determined. Consequently, the Council will normally expect the planning obligation to specify the anticipated delivery site (or sites).
- 3.55 For off-site provision, we will assess how much housing is required by looking at all sites involved in the arrangement. We will apply the 50% target to the



additional floorspace added at all sites involved, taking into account the full addition to non-residential floorspace proposed at the application site, any gain or loss of non-residential floorspace arising at the site or sites where the housing will be delivered and the need to replace any existing housing lost as part of each development. Where the housing is delivered off-site, this will enable additional non-residential space to be provided at the application site, and increase the overall scale of development, so the Council will generally expect the development to deliver significantly more housing than it could provide on-site.

- 3.56 The Council will seek any off-site provision of housing on an alternative site nearby. Alternative sites must be in the borough, and will initially be sought in the same ward as the development. Where the development is south of Euston Road, and no sites are available in the same ward, the Council may consider alternative sites south of Euston Road. Where the development is north of Euston Road, if no sites are available in the same ward, the Council will subsequently seek sites in an adjacent ward to the north of Euston Road, and finally seek the nearest appropriate site to the north of Euston Road. As part of the consideration of off-site options we will explore with developers whether the housing could be delivered on Council-owned land.
- 3.57 Exceptionally, where provision of housing is required, on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation.
- 3.58 More detailed information regarding the calculation of off-site provision and payments in lieu is provided in our supplementary planning document Camden Planning Guidance on housing and Camden Planning Guidance on planning obligations.

### **Achieving an appropriate mix of housing and other uses**

- 3.59 Where housing is required as part of a mix of uses, all criteria in Policy H2, including criteria (a) to (e), will be used to help us consider the appropriate mix of housing and other uses for a site, and whether the housing should be provided on the site or elsewhere. Details of how these criteria will be applied are set out in supplementary planning document Camden Planning Guidance on housing (including the assessment of financial viability), but a number of considerations are set out below.
- 3.60 The character of an area and existing uses in the area and on the site may influence the mix of uses that is most appropriate. Residential or non-residential uses may need to be introduced into an area to add to community safety, for example by adding to the diversity and vitality of streets where there is limited activity at certain times of the day or week, or ensuring that street activity can be seen by nearby residents.
- 3.61 In some areas it may be necessary to strike a balance between the need to meet the space requirements of a particular activity or user and the priority given to housing. Many Central London activities have a national and international function and make major contributions to Camden's economy, and their needs will be given significant weight. The Council supports the institutions and

activities that comprise the Knowledge Quarter in the general area of King's Cross, Euston Road and Bloomsbury such as the Wellcome Institute and the various components of the University of London, and their requirements may be foremost in particular locations.

- 3.62 The Council is committed to promoting and facilitating growth, and we will seek to ensure that the operation of Policy H2 encourages deliverable development and helps growth to take place. We will take into account the space needs of existing users and seek to ensure that they can expand without relocating. We will also consider whether a viable development requires a particular amount or layout of commercial space.
- 3.63 The Council will positively consider alternative approaches that can better deliver a supply of land for self-contained housing, for example making a site available for housing development by another organisation such as the Council or a Housing Association. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver a mixed-use scheme containing housing e.g. the impact of providing a new station entrance to promote public transport.
- 3.64 In negotiating the appropriate mix of uses, the Council will consider all aspects of financial viability including particular costs associated with the development and the distinctive viability characteristics of particular development sectors (such as build-to-let housing). We will generally expect submission of a financial viability appraisal to justify the mix proposed, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable



disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. Where the proposed contribution to affordable housing falls significantly short of the Policy H2 target or the appraisal raises doubts about the deliverability of the development, the Council may also seek an independent verification of the appraisal funded by the developer.

- 3.65 In the Central London Area and the town centres listed in Policy H2, where provision of self-contained housing is required but financial viability constraints prevent a development from meeting the 50% housing target and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution (similar to 'contingent obligations' referred to in London Plan Policy 3.12). The deferred contingent contribution will be based on the shortfall between the initial contribution and the target having regard to any uses introduced as an alternative to housing (e.g. jewellery workshops in Hatton Garden). We will seek contingent contributions from single phase and multiphase schemes, and expect financial viability to be reviewed close to substantial completion. We believe these provisions are justified by Camden's particular circumstances, notably the small size of Camden's development sites, the high rate and scale of house price rises, the unpredictability of prices in premium locations, the potential for cost-engineering (particularly for high-specification designs) and the risk of build-cost inflation. Our supplementary planning document Camden Planning Guidance on housing provides more detailed guidance on the operation of deferred contingent contributions.

## Protecting existing homes

3.66 Policy H3 seeks to protect all housing floorspace where people live long-term. It also seeks to protect individual self-contained houses and flats (in Use Class C3) and individual houses and flats shared by 3-6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, Use Class C4).

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

- affordable housing floorspace is protected by Policy H5;
- housing for older people, homeless people and vulnerable people is protected by Policy H8;
- student housing is protected by Policy H9; and
- other housing where occupiers do not live as a family but are long-term residents sharing some rooms and/ or facilities (such as bedsits) is protected by Policy H10.

### Policy H3 Protecting existing homes

The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by:

- a. resisting development that would involve a net loss of residential floorspace, including any residential floorspace provided;
  - within hostels or other housing with shared facilities; or
  - as an ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use;
- b. protecting housing from permanent conversion to short-stay accommodation intended for occupation for periods of less than 90 days; and
- c. resisting development that would involve the net loss of two or more homes (from individual or cumulative proposals), unless they:
  - create large homes in a part of the borough with a relatively low proportion of large dwellings;
  - enable existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed; or
  - enable sub-standard units to be enlarged to meet residential space standards.

Exceptionally, the Council may support development that involves a limited loss of residential floorspace where this provides for the expansion of existing health premises to meet local needs.





### Loss of residential floorspace

- 3.68 As indicated in the paragraphs accompanying Policy H1, meeting housing needs in Camden and across London will be challenging. To tackle Camden's housing needs, the Council aims to maximise the supply of additional homes and regards self-contained housing as the priority land-use of the Local Plan. In tandem with these objectives the Council also aims to protect all types of existing housing against development that would involve a net loss of residential floorspace.
- 3.69 The types of housing we aim to protect include:
- residential floorspace that is ancillary to another use (e.g. staff accommodation above a shop or pub) where the proposed change involves development and is subject to planning control; and
  - floorspace at nursing homes, care homes or hospitals where people live long-term such as accommodation for nurses and for patients who are no longer able to live independently (including resident lounges, sleeping areas, bathrooms/ toilets, and associated circulation space).
- 3.70 Proposals we will resist include:
- reductions in floorspace that are material because they reduce the number of residents who can occupy a home or property; and
  - proposals that would involve a permanent change of residential floorspace from long-term accommodation to short-term visitor accommodation let for periods of less than 90 days. In London, the Greater London Council (General Powers) Act 1973 (as amended by the Deregulation Act 2015) provides for Council Tax payers to let their property as visitor accommodation for short periods not exceeding a total of 90 days in any one



calendar year, however a permanent change to visitor accommodation is defined as development.

- 3.71 Letting housing to visitors reduces the accommodation available to permanent residents. Visitor lettings can also increase the incidence of noise, sometimes at unsociable hours, and generate high turnover of occupiers that harms community cohesion and increases the fear of crime. The Deregulation Act provides for the Council to seek to exempt particular properties or areas from the provisions that allow visitor lettings where this is necessary to protect the amenity of the locality. The Council will monitor the impact of visitor lettings and consider seeking exemptions if evidence emerges of harm to amenity in particular locations. Householders considering letting out their property are advised to check the terms of their leases, tenancies, insurance and mortgages, as these may contain restrictions that prevent them from letting the property to somebody else.
- 3.72 In some circumstances, where proposals would involve the loss of homes or residential floorspace, it may be appropriate for replacement homes or floorspace to be provided on an alternative site. We will have regard to Policy H2 Maximising the supply of self-contained housing from mixed-use schemes (mixed-use development) when considering whether housing should be retained on-site or re-provided off-site.

#### **Net loss of two or more homes**

- 3.73 The starting point for housing targets is the projected growth in the number of households, and the needs of these households can only be met by net additions to housing numbers. Every home that is lost through redevelopment or conversion is a home that needs to be replaced. Since March 2008, approximately 50 dwellings a year have been lost through development involving a net loss of homes. Around 40% were lost in developments involving loss of a single home, many of which combined two flats to create a single dwelling. The Council therefore aims to ensure that existing dwellings will continue to be available to meet housing needs and that the overall supply of housing will not be compromised by developments involving a net loss. Where development involves the demolition or other loss of homes, the Council will generally expect it to provide a similar or greater number of replacement dwellings, to an equivalent or better standard than the homes removed.
- 3.74 However, the Council also recognises that there are situations where the loss of individual homes may be justified. Policy H3 indicates that such losses may be acceptable in the situations set out in the next four paragraphs.
- 3.75 Net loss of one home is acceptable when two dwellings are being combined into a single dwelling. Such developments can help families to deal with overcrowding, to grow without moving home, or to care for an elderly relative. Within a block of flats or apartments, such a change may not constitute development. However, the Council will resist the incremental loss of homes through subsequent applications to combine further homes within the same building or site.
- 3.76 A net loss of homes is acceptable when three or more dwellings are being combined to create an additional large dwelling (3 or more bedrooms) in the following four wards with a low proportion of large dwellings – Bloomsbury,

King's Cross, Holborn and Covent Garden and Kilburn. The 2011 Census shows that the average number of bedrooms per household in these wards is less than 2 (compared with 2.1 across the borough), and less than 25% of households have five or more rooms overall (compared with 31.6% across Camden).

- 3.77 We may permit proposals to combine three or more dwellings to create a large affordable home (3 or more bedrooms). The existing stock of affordable housing (particularly Council housing) is heavily skewed to one and two-bedroom homes. The 2011 Census indicates that over 19.3% of households in social rented housing are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 11.7% across all tenures.
- 3.78 We may permit proposals to combine three or more dwellings where the existing dwellings are 20% or more below residential space standards, provided the loss of dwellings is no greater than needed to meet the standards. Residential space standards are set out in the nationally described space standard and in Table 3.3 of the Minor Alterations to the London Plan 2015.
- 3.79 For the purposes of Policy H3 we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3), and will resist the loss of two or more small houses in multiple occupation. This reflects the freedom provided in legislation for changes between these uses without a planning application.
- 3.80 Our supplementary planning document Camden Planning Guidance on housing provides further information about how we will apply Policy H3.

#### **Expansion of health premises**

- 3.81 Many health premises such as GP surgeries are located between or below homes, often in appropriate locations where they are easily accessible to the people that need them. Expansion of these premises to meet changing local needs may not be possible without the loss of some residential floorspace. The Council may therefore support the loss of residential floorspace in these circumstances provided that the need for expansion of the health premises is demonstrated, and the loss of floorspace is no greater than is necessary.

## Maximising the supply of affordable housing

- 3.82 Policy H4 applies primarily to the following types of housing:
- self-contained houses and flats (Use Class C3);
  - live/ work units, which are self-contained homes that include a dedicated work area (not in any planning use class, we will treat them as Use Class C3 when we apply Local Plan policies); and
  - houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (small houses in multiple occupation or HMOs, Use Class C4).
- 3.83 We will also apply Policy H4 to other types of housing, subject to the provisions of Plan policies relevant to the particular housing type, although the mechanics of considering and securing affordable housing provision may vary having regard to Policy H4 criteria (j) to (p). In particular, we will consider Policy H4 when assessing proposals for:
- houses or flats shared by more than six occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (large houses in multiple occupation or HMOs, outside any planning use class) (see also Policy H10 Housing with shared facilities ('houses in multiple occupation')); and
  - housing for older people and vulnerable people (potentially in Use Classes C2 or C3, or outside any planning use class) (also see Policy H8).

### **Policy H4 Maximising the supply of affordable housing**

The Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.

We will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The Council will seek to negotiate the maximum reasonable amount of affordable housing on the following basis:

- a. the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing;
- b. targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home;
- c. targets are applied to additional housing floorspace proposed, not to existing housing floorspace or replacement floorspace;

- d. a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;
- e. an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;
- f. for developments with capacity for 25 or more additional homes, the Council may seek affordable housing for older people or vulnerable people as part or all of the affordable housing contribution;
- g. where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;
- h. for developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site; and
- i. where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area, or exceptionally a payment-in-lieu.

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

In considering whether affordable housing provision should be sought, whether 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:

- j. the character of the development, the site and the area;
- k. site size and any constraints on developing the site for a mix of housing including market and affordable housing, and the particular types of affordable provision sought;
- l. access to public transport, workplaces, shops, services and community facilities;
- m. the impact on creation of mixed, inclusive and sustainable communities;
- n. the impact of the mix of housing types sought on the efficiency and overall quantum of development;
- o. 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-let housing; and
- p. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

Where the development's contribution to affordable housing falls significantly short of the Council's targets due to financial viability, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution, based on the initial shortfall and an updated assessment of viability when costs and receipts are known as far as possible.

### Meaning of affordable housing

- 3.84 The government defines affordable housing in the National Planning Policy Framework. To comply with the government definition, affordable housing should:
- be provided to households whose needs are not met by the market;
  - be provided to eligible households, where eligibility takes into account local incomes and house prices;
  - remain at an affordable price for future eligible households unless the subsidy is recycled for alternative affordable housing provision.
- 3.85 The government includes three types of housing within this broad definition.
- 3.86 Social rented housing is provided at rents guided by national targets, and is mostly owned by the Council or Housing Associations.
- 3.87 Affordable rented housing is also provided to households who are eligible for social rented housing, mostly by the Council or Housing Associations. Rents are guided by local market rents rather than national targets.
- 3.88 Intermediate housing costs less than market housing but more than social rented housing and complies with the overarching government definition of affordable housing. It includes shared ownership, other low cost ownership and intermediate rent. It can also include key worker housing for groups such as health service staff, teachers and workers in emergency services. The Mayor sets caps on the income groups eligible for intermediate housing through the London Plan (updated in Annual Monitoring Reports).





- 3.89 The Council will seek planning obligations to ensure that affordable housing complies with these definitions, is available to Camden households that are unable to access market housing, and continues to be available at an affordable price in the future unless the subsidy is recycled. We will also ensure that the affordable housing is:
- delivered before or concurrently with any market housing forming part of the same proposal; and
  - delivered in strict accordance with Local Plan objectives by a provider (such as a Housing Association) approved by the Council.
- 3.90 For the purposes of this policy, social and affordable rented housing are considered together as “social-affordable rented housing”, which reflects the approach of the London Plan. Detailed information on the mix of affordable tenures and rent levels sought in Camden are included in our supplementary planning document Camden Planning Guidance on housing. Following adoption of the Local Plan, the Council will consult on revised Camden Planning Guidance, taking into account the GLA Funding Guidance for London Affordable Rent and the finalised version of the Mayor’s Affordable Housing and Viability SPG, which will provide detail on the preferred mix of tenures for each borough and information on where the latest benchmark rents can be found.
- 3.91 The Housing and Planning Act 2016 provides for the introduction of Starter Homes as a way to help first-time buyers who are at least 23 years old but not yet 40 to buy their own home at a discount price. Starter Homes should be offered at a discount of at least 20% below market value and are subject to a price cap (in London the price cap has initially been set at £450,000 based on the average price paid by a first-time buyer).
- 3.92 The government has consulted on proposed Starter Homes Regulations and changes to the National Planning Policy Framework (NPPF) that would require certain types of development to include a set percentage of Starter Homes and broaden the definition of affordable housing to include homes for discount market sale. When the Starter Homes Regulations and amended NPPF are published, the Council will consider their impact on policies relating to affordable housing, provide guidance in our supplementary planning documents, and propose changes to the Local Plan if necessary. Starter Homes are considered further in Policy H6 Housing choice and mix and supporting paragraphs.
- 3.93 More details about the categories of affordable housing and how they are controlled are given in the London Plan, the Mayor’s Housing SPG and our supplementary planning document Camden Planning Guidance on housing.

### **Strategic affordable housing target**

- 3.94 The Camden Local Plan Viability Study has assessed the cumulative impact of local plan policies along with costs arising from Camden’s Community Infrastructure Levy (CIL) and planning obligations. The Viability Study looks at a range of scheme types in a range of locations tested against a range of land values. The Viability Study recommends that a 50% affordable housing target should be adopted on the basis that there is potential for 50% affordable housing to be delivered by a significant number of scheme types and in a significant range of locations.

3.95 Camden has a particularly large requirement for additional affordable homes, estimated by the Camden SHMA to be around 10,000 homes for the 15-year Plan period. As indicated in Policy H1, on the basis of the London Plan and the London SHLAA we seek to exceed a target of 16,800 homes in total from 2016-2031, including 11,130 additional self-contained homes. To set a target for affordable housing we have estimated the level of provision likely to be viable and deliverable, taking into account the relationship between development costs, the value of market and affordable homes, the government's intention to focus housing subsidy on boosting home ownership, the income households have to spend on housing, affordable housing need, and the anticipated housing output of the Council's Community Investment Programme. Balancing these considerations, the Council considers that it is feasible for the borough to meet a strategic target of 5,300 additional affordable homes over the Plan period.

#### **Proposals that generate an affordable housing requirement**

3.96 The London Plan indicates that boroughs should normally require affordable housing provision from sites with capacity to provide 10 or more homes, and encourages boroughs to seek lower thresholds where it can be justified, including where this can achieve an equitable contribution from dwellings with a large floorspace.

3.97 The government issued guidance in 2014 creating a national affordable housing threshold and advising that councils should not seek affordable housing from developments involving 10 homes or less, or 1,000sqm or less. Following legal challenges, this guidance was confirmed in 2016.

3.98 Given the scale of affordable housing need in the borough, the Council's aspiration is that as many residential developments as possible should provide affordable housing. The Camden Local Plan Viability Study shows that there is no direct correlation between scheme size and viability, and there is no viability basis for an affordable housing threshold or a lower target for smaller schemes. Through the Local Plan process, the Council has made provision for the Local Plan to seek affordable housing from smaller schemes as an exception to the national threshold. Policy H4 therefore sets out:

- an affordable housing threshold of one or more additional homes involving a total addition to residential floorspace of 100sqm GIA or more; and
- affordable housing targets based on a sliding scale which will apply to any proposal involving one or more additional homes and a total addition to residential floorspace of 100sqm GIA or more.

3.99 The sliding scale has been set to achieve the maximum reasonable contribution overall without deterring development, causing delays to decision-making, increasing the burden of financial viability appraisals, or risking creation of a high starting target that suppresses scheme or dwelling size. More information about the operation of the sliding scale is provided in paragraphs 3.106 to 3.110.

3.100 For the purposes of Policy H4 we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3), and seek provision of affordable housing from proposals for one or more additional small houses in multiple occupation. This reflects the freedom provided in legislation for changes between these uses without a planning application.



Where larger houses in multiple occupation are proposed, we will seek affordable housing unless the development is secured as a long-term addition to the supply of low cost housing.

- 3.101 Where market housing is proposed for older people or vulnerable people, we will apply Policy H4 as far as possible to seek an equivalent amount of affordable provision for older people or vulnerable people, to meet more general needs. However, we acknowledge that such forms of housing are likely to have distinctive financial viability characteristics, particularly if an element of care is involved, and we will take a flexible approach to the scale and nature of provision and whether the affordable provision should be made on site.

#### **Basis for seeking affordable housing provision from specific proposals**

- 3.102 Given the scale of affordable housing need in the borough, the Council seeks the maximum reasonable amount of affordable housing on development sites in accordance with the London Plan. Policy H4 criteria (a) to (i) provide a common basis for negotiations while criteria (j) to (p) set out factors that will determine what is reasonable in any particular case. The following paragraphs outline the operation of criteria (a) to (i), while the subsequent section outlines criteria (j) to (p). Our supplementary planning document Camden Planning Guidance on housing provides more detailed guidance on the operation of the criteria.

#### **Guideline mix of affordable housing types**

- 3.103 Provision of intermediate housing (between the cost of social rented housing and market housing) has some potential to retain middle income households in Camden and lessen social polarisation. However, high values in many parts Camden mean that the intermediate housing can be more expensive than

the market rents available in cheaper areas within the borough or nearby. To balance these concerns, the Council has set guideline percentages for the split of affordable housing types at 60% social-affordable rented housing and 40% intermediate housing.

- 3.104 Intermediate housing for shared-ownership can help households into owner occupation, but in Camden it is rarely possible for providers to deliver shared-ownership housing that would be affordable for households with incomes close to the median household income in Camden, and highly challenging to deliver schemes meeting the income thresholds set out in the London Plan. Given these constraints, we will strongly encourage provision of homes for intermediate rent rather than shared ownership, subject to maximising overall affordable housing output in the context of the resources available and development viability. We will also encourage the development of innovative intermediate housing products that can be made affordable to a wider range of groups in Camden.
- 3.105 These guidelines will be applied flexibly taking into account the criteria in Policy H4, and in certain circumstances the Council may support proposals which only provide social-affordable rented housing or only provide intermediate housing. We will encourage a focus on social-affordable housing where a proposal falls far short of the affordable housing target (e.g. below 30% affordable), or intermediate housing cannot be delivered for people in a range of incomes below the London Plan thresholds. Where a proposal substantially exceeds the affordable housing target (e.g. over 65% affordable), the Council may support development that only provides intermediate housing, particularly if it is designed to meet the needs of a particular group.

#### **Negotiating on the basis of capacity, floorspace and sliding scale**

- 3.106 We will negotiate to seek an affordable housing contribution from schemes that involve one or more additional homes, but will not seek a contribution from schemes that simply extend or replace an existing home. This will help us to expedite replacement of homes that are subject to damage or disrepair, and extension of homes for families that are growing or need space to care for an elderly or disabled relative.
- 3.107 For schemes which involve one or more additional homes, we will assess their overall capacity for additional homes, starting from the proposed addition to floorspace. Having regard to the nationally described space standard (London Plan Table 3.3), we will generally assess an additional 100sqm GIA residential floorspace as having capacity for one additional home. In order to avoid deterring small extensions to existing residential blocks and or distorting the size of dwellings within them, we will not seek an affordable housing contribution from developments that involve less than 100sqm of additional residential floorspace, including:
- schemes that involve the subdivision of existing housing to create more homes;
  - schemes that provide one home of 90sqm GIA; and
  - schemes that provide two homes of 45sqm GIA each.
- 3.108 A development is able to provide a mix of large and small homes consistent with Policy H7 Large and small homes whilst complying with the space standard and



achieving an average of 100sqm GIA per home. We will therefore assess the capacity for additional homes on the basis of multiples of 100sqm GIA, rounding the additional residential floorspace to the nearest 100sqm GIA so the assessed capacity will always be a whole number. An additional 1,200sqm GIA will generally have capacity for 12 homes, an additional 1,800sqm GIA will generally have capacity for 18 homes, and an additional 2,400sqm GIA will generally have capacity for 24 homes. However, we will take into account any constraints on capacity where existing buildings are converted (particularly listed buildings and other heritage assets), or where ancillary residential space would be unable to provide dwellings (e.g. due to lack of natural light). The assessed capacity for additional homes will be used to determine the percentage affordable housing required in accordance with sliding scale set out in Policy H4 criteria (d) and (e) and paragraph 3.110.

- 3.109 We will apply affordable housing targets on the sliding scale directly to the proposed addition to residential floorspace rather than to the number of homes or 'units' or the capacity for additional homes. We will use the affordable housing targets to seek a proportion of the proposed addition to residential floorspace as on-site affordable housing, except in the case of proposals with capacity for fewer than 10 additional homes where we may accept a payment in lieu of affordable housing (see paragraph 3.111). The use of floorspace in negotiation ensures that we are able to secure large affordable homes with 3 bedrooms or more. Seeking large affordable homes is consistent with London Plan priorities. Negotiating on the basis of number of 'units' would incentivise the delivery of small affordable homes and exacerbate the skew towards one- and two-bedroom homes in our existing affordable supply.





- 3.110 On the basis of the Camden Local Plan Viability Study, the Council will apply a target of 50% affordable housing to development proposals that include housing and have capacity for 25 or more additional homes. However, we have set a sliding scale target for smaller schemes involving one or more additional homes. The sliding scale starts from a target of 2% where there is capacity for one additional home, and increases on a 'straight-line' basis. Capacity for each further additional dwelling (or each 100sqm GIA additional floorspace) increases the target by 2%. Thus the target for a scheme with capacity for an additional 12 dwellings is 24%, at 18 additional dwellings the target is 36%, and at 24 additional dwellings that target is 48%.

#### **Whether the affordable housing should be provided on-site**

- 3.111 The NPPF indicates that where affordable housing is needed, policies should set out to meet this need on site. However, in the case of proposals with capacity for fewer than 10 additional homes (1,000sqm GIA), we will accept a payment-in-lieu of affordable housing. We consider payments-in-lieu are appropriate for these minor schemes (in tandem with relatively modest floorspace requirements based on the sliding scale target) as the affordable housing required would rarely be equivalent to a whole dwelling, and the obstacles to on-site delivery would generally exceed the benefits. More information on payments-in-lieu is provided by paragraph 3.117 on page 74.
- 3.112 In line with the NPPF, the Council's strong preference for larger proposals is for affordable housing to be provided on-site alongside market housing because this helps to create mixed and inclusive communities and ensure that the delivery of the affordable housing is secured to the same timescale as the market housing.
- 3.113 The Council accepts that there are some circumstances where it may be appropriate to deliver some or all of the affordable housing off-site. In considering whether off-site provision is appropriate, the Council will consider the criteria set out in Policy H4 and other relevant factors such as whether a greater number of affordable homes could be delivered through an off-site solution, whether it is practical for a single block to accommodate market and affordable homes, and the affordability of the anticipated service charges. Market and affordable housing have been successfully delivered alongside each other on a number of small sites in Camden, and the Council will expect developers to demonstrate that they have worked with affordable housing providers to consider fully whether the development can be designed to provide on-site affordable housing.
- 3.114 Where a development has capacity for 10 or more additional homes and the Council considers off-site provision is appropriate, the Council will take into account all related sites when assessing how much affordable housing is required. Where a development omits affordable housing it will be possible to deliver additional market housing on-site, and the Council will expect to achieve a significantly enhanced affordable housing contribution off-site (in terms of quantity and/ or quality), having regard to the net additional market floorspace across all sites.
- 3.115 Where off-site provision is appropriate, we will seek development of the affordable housing on an alternative site nearby, secured by a planning

obligation. Given the intense competition for sites in Camden, the Council will normally expect the planning obligation to ensure delivery of the affordable housing by specifying the anticipated delivery site (or sites).

- 3.116 Alternative sites must be in the borough, and will initially be sought in the same ward as the development. Where the development is south of Euston Road, and no sites are available in the same ward, the Council may consider alternative sites south of Euston Road. Where the development is north of Euston Road, if no sites are available in the same ward, the Council will subsequently seek sites in an adjacent ward to the north of Euston Road, and finally seek the nearest appropriate site to the north of Euston Road. As part of the consideration of off-site options we will explore with developers whether the affordable housing could be delivered on Council-owned land.
- 3.117 Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for affordable housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation. Payments-in-lieu are derived by calculating the affordable housing floorspace required as set out in paragraphs 3.107 to 3.110, and converting this to a payment using a 'cost' per sqm. More detailed information regarding the calculation of off-site provision and payments in lieu, including a formula for the 'cost' per sqm, is provided in our supplementary planning documents Camden Planning Guidance on housing and Camden Planning Guidance on planning obligations.

#### **Provision of affordable housing to meet particular needs**

- 3.118 Policy H4 provides for us to seek affordable housing to meet the particular needs of older people or vulnerable people in association with any developments involving housing where they have capacity for 25 homes or more. As indicated in Policy H8 Housing for older people, homeless people and vulnerable people and supporting paragraphs, the Council will focus on meeting the needs of older people and vulnerable people by providing support in existing homes (with adaptations where necessary), but new supported living accommodation may be needed for some groups such as people living with dementia and people with learning disabilities. We anticipate that a proportion of any new provision would need to be in the affordable sector, but the distinctive viability characteristics of supported living mean that affordable provision is unlikely to be delivered in conjunction with market-led supported living. We will only seek provision in schemes with capacity for at least 25 homes as such schemes offer potential for affordable homes for older people or vulnerable people to be clustered and benefit from coordinated support. In considering whether affordable housing should be sought for older or vulnerable people and the scale and nature of provision, the Council will also take into account all relevant criteria in Policy H4 Maximising the supply of affordable housing and Policy H8 Housing for older people, homeless people and vulnerable people.

### Split sites and related sites

- 3.119 Where a site or a group of related sites becomes available for development, the Council will expect proposals to take the form of a comprehensive scheme rather than piecemeal development, and will expect a single assessment of the maximum reasonable amount of affordable housing taking account of all components. We will seek to resist schemes that are artificially split into a series of proposals to avoid reaching the affordable housing threshold or the full 50% affordable housing negotiating target. We will seek planning obligations to ensure that each part of a split or phased development makes an appropriate affordable housing contribution, having regard to the contribution that would arise from a single assessment across all components.

### Achieving an appropriate mix of market and affordable housing types

- 3.120 Policy H4 criteria (j) to (p) indicate the factors that we will consider when assessing the mix of market, intermediate and social-affordable rented housing appropriate for a site, and whether any off-site delivery of affordable housing is appropriate. Details of how these criteria will be applied are set out in our supplementary planning document Camden Planning Guidance on housing (including the assessment of financial viability), but a number of key considerations are set out below.
- 3.121 The character of the development, the site and the area (including site size and the ability to accommodate additional entrances and circulation spaces) will influence whether it can accommodate a mix of market and affordable housing. Factors to be considered include whether existing buildings need to be retained on-site (e.g. heritage assets), whether dual-aspect homes and large homes of 3



or more bedrooms can be incorporated (particularly for social-affordable rented housing), and the implications of anticipated service charges on the cost of affordable housing.

- 3.122 Generally sites in the borough have good access to public transport, workplaces and facilities. However, in very rare cases where a proposal is demonstrably remote from workplaces and facilities and has low public transport accessibility, on-site provision of affordable housing may not be appropriate. Most areas in the borough also have reasonably mixed and sustainable communities, including both market and affordable housing. However, there are some areas that have a very high proportion of market housing or social-affordable rented housing, which may sometimes influence whether on-site or off-site affordable housing is most appropriate, or the most appropriate mix of affordable housing types.
- 3.123 In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability, including the availability of public subsidy, particular costs associated with the development (such as restoration of heritage assets and remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build-to-let housing). We will expect submission of a financial viability appraisal to justify the proportion of affordable housing proposed and demonstrate that the proposed affordable housing is deliverable, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. Where the proposed contribution to affordable housing falls significantly short of the Policy H4 target or the appraisal raises doubts about the deliverability of the affordable housing the Council may also seek an independent verification of the appraisal funded by the developer.
- 3.124 Where financial viability constraints prevent the development from meeting the Council's affordable housing target, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution to affordable housing (similar to 'contingent obligations' referred to in London Plan Policy 3.12), based on the shortfall between the initial contribution and the target. We will seek contingent contributions from single phase and multiphase schemes, and expect financial viability to be reviewed close to substantial completion. We believe these provisions are justified by Camden's particular circumstances, notably the small size of Camden's development sites, the high rate and scale of house price rises, the unpredictability of prices in premium locations, the potential for cost-engineering (particularly for high-specification designs) and the risk of build-cost inflation. Our supplementary planning document Camden Planning Guidance on housing provides more detailed guidance on the operation of deferred contingent contributions.
- 3.125 The Council will positively consider alternative approaches to delivering affordable housing as part of development. We will encourage proposals that can better maximise the supply of affordable housing while providing an appropriate mix of affordable housing types, for example by converting existing market housing into affordable housing. The Council will also consider how

proposals deliver other plan objectives and their impact on the potential to deliver affordable housing e.g. the impact of including affordable business space for small and medium-sized enterprises (SMEs).



## Protecting and improving affordable housing

- 3.126 Policy H5 seeks to protect all affordable housing floorspace in the broad sense of housing that is provided at less than market costs due to the character of the homes, the occupants, or the providers, or a formal affordable housing designation. It seeks particularly to protect:
- social-affordable rented housing and intermediate housing managed by the Council, Housing Associations and other Registered Providers;
  - key-worker accommodation such as nurses' homes and hostels; and
  - other low cost housing provided in connection with a job such as a caretaker's flat.
- 3.127 Other policies in this section also provide more specific provisions protecting particular types of housing as follows:
- housing for older people, homeless people and vulnerable people is protected by Policy H8;
  - student housing is protected by Policy H9;
  - other housing where occupiers do not live as a family but are long-term residents sharing some rooms and/ or facilities (such as bedsits) is protected by Policy H10.
- 3.128 Losses of affordable housing may not always be subject to planning control, for example where the housing is ancillary to another primary use (e.g. a nurses' home provided as part of a hospital) and no change is proposed to the primary use.

### Policy H5 Protecting and improving affordable housing

The Council will aim to secure sufficient high quality affordable homes of different types and sizes to meet the needs of existing and future Camden households who are unable to access market housing and create mixed, inclusive and sustainable communities by:

- a. regenerating existing estates and providing more and better affordable homes at an appropriate density through the Community Investment Programme and Better Homes Programme; and
- b. protecting existing affordable housing floorspace of all types.

### Regenerating estates and homes

- 3.129 As part of the Council's Community Investment Programme (CIP) we are undertaking widespread estate regeneration and works to existing homes to ensure that the Council tenants live in good quality accommodation that meets contemporary standards. Through estate regeneration and other CIP proposals, we will replace 650 Council rented homes which are too expensive to repair and maintain, build 750 new affordable homes (including new Council rented homes) and build 1,650 new market homes that will be offered to local people

first. Estate regeneration also aims to deliver wider benefits by tackling health inequality, helping local residents to take advantage of growing employment opportunities, and making our communities more sustainable and resilient.

- 3.130 CIP proposals will generate funds for the Council's ongoing "Better Homes" programme, which refurbishes existing Council homes. Since the Better Homes programme started in April 2011 around £50 million has been invested each year and thousands of Council homes have been improved, but many homes still need work to kitchens, bathrooms, wiring, windows, roofs, heating, lifts and other aspects of the structures and fittings. We estimate that investment of over £50 million in our Council housing will be needed every year for the next 30 years.

### **Loss of affordable housing**

- 3.131 As indicated in Policy H4 Maximising the supply of affordable housing, Camden has a particularly large requirement for additional affordable homes. However, the stock of formally designated affordable homes in the borough fell between 2001 and 2011, widening that gap between need and supply. The 2011 Census showed a reduction of 2,000 in the number of households living in social rented homes, only partly off-set by the emergence of just under 700 households occupying affordable homes in shared ownership. In the last 20 years there has also been a reduction in the amount of housing provided for nurses and other health service workers, including the loss of hostels in Guilford Street (formerly attached to University College Hospital), Euston Road (former Elizabeth Garrett Anderson hospital), College Crescent and New End (both formerly attached to the Royal Free Hospital). The Council therefore protects existing affordable housing against further losses.



- 3.132 The existing affordable housing stock is heavily skewed to 1 or 2-bedroom homes, and overcrowding in the existing stock creates a compelling need for an additional supply of large affordable homes with 3 or more bedrooms. Older accommodation for health service workers often has shared facilities such as kitchens and bathrooms, whereas contemporary demand from key workers is for self-contained accommodation. To take account of this mismatch between supply and demand, the Council seeks to protect affordable housing floorspace rather than each individual affordable home, and will support proposals that adapt affordable homes to fit contemporary and future needs, for example by combining small flats. Where such adaptations take place, the Council will seek to ensure that arrangements are in place to re-house all existing occupiers.
- 3.133 Redevelopment of affordable housing should generally provide new social-affordable rented housing to replace existing social-affordable rented homes, and new intermediate affordable housing to replace existing intermediate homes. Where the existing housing is for key workers or provided in connection with a job, redevelopment should provide for the same group of occupiers unless their needs have been met elsewhere, in which case social-affordable rented housing and intermediate housing will be sought. The Council will consider the mix of replacement affordable housing types flexibly, and seek to address mismatches between supply and demand, having regard to Policy H4 Maximising the supply of affordable housing. The Council will also be flexible in considering replacement affordable housing on an alternative site provided that the replacement housing will:
- continue to give occupiers access to public transport, workplaces, shops, and community facilities; and
  - contribute to creating a mixed, inclusive and sustainable communities.
- 3.134 The Council's Community Investment Programme (CIP) will involve refurbishment of our estates, and redevelopment in some cases. The programme is a long-term strategy, and will involve relocating some occupiers while their homes are refurbished or redeveloped. Over the course of the programme, there may be redistribution of occupiers and of affordable housing floorspace from one part of an estate to another, or even from one estate to another. The Council will take a strategic approach to estate regeneration, taking into account the potential to attract investment and the benefits of mixed and inclusive communities. We will resist the loss of affordable housing floorspace across the programme as a whole, but may not resist localised or short-term losses provided a strategy is in place for their eventual replacement.
- 3.135 Housing and affordable housing required in association with Policy H2 Maximising the supply of self-contained housing from mixed-use schemes and Policy H4 Maximising the supply of affordable housing should be provided in addition to any retained or replacement affordable housing arising under Policy H5 Protecting and improving affordable housing.

## Housing choice and mix

- 3.136 The Council aims to achieve mixed, inclusive and sustainable communities by seeking a range of housing types suitable for households and individuals with different needs. Seeking a range of housing types, sizes, accessibility and affordability will help us deliver the Camden Plan by tackling inequality, creating sustainable and resilient neighbourhoods, improving health and wellbeing and securing a supply of housing suitable for individuals and families on low and middle incomes. Tailoring housing types to people's particular needs will also help us ensure the right housing for Camden's diverse communities in line with the recommendations of the Equality Taskforce.
- 3.137 Development sites in Camden typically cater for fewer than 100 homes, and it will not be feasible to include a very wide range of housing in every development. Where housing is proposed we will prioritise development of self-contained housing in accordance with Policy H1, including affordable housing. We will require new homes to meet standards for internal space and accessibility and provide a mix of dwelling sizes. We will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet general and particular needs. Given the limited size and high value of development sites in the borough, it will be challenging to deliver some of the housing types needed in Camden, particularly serviced plots for self-build housing and pitches for Camden's traveller community. Consequently, where larger sites do come forward (0.5 ha or greater), we will expect housing development to provide for particular housing needs including the needs of self-builders, taking into account the characteristics and constraints of the site and area.
- 3.138 Individual policies in this section of the Plan address the specific housing needs of a number of groups in our community:
- Policy H6 addresses the overall need for a mix of housing types, the particular needs of people with mobility difficulties and wheelchair users, the needs of service families, and the needs of people wishing to build their own homes;
  - Policy H7 addresses the size of homes (number of bedrooms) needed for large and small families with children, single people, couples and other types of household;
  - Policy H8 addresses homes for older people, homeless people and vulnerable people;
  - Policy H9 addresses the housing needed for students;
  - Policy H11 addresses the accommodation needs of gypsies and travellers and travelling showpeople.

## Policy H6 Housing choice and mix

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

We will seek to secure high quality accessible homes in all developments that include housing. We will:

- a. encourage design of all housing to provide functional, adaptable and accessible spaces;
- b. expect all self-contained homes to meet the nationally described space standard;
- c. require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); and
- d. require 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

We will seek to secure a variety of housing suitable for existing and future households overall across development in the borough. When considering future site allocations and negotiating the types of housing included in each development, we will:

- e. seek a diverse range of housing products in the market and affordable sectors to meet the needs across the spectrum of household incomes;
- f. promote Starter Homes in accordance with government requirements;
- g. support the development of private rented homes where this will assist the creation of mixed, inclusive and sustainable communities;
- h. seek provision suitable for families with children, older people, people with disabilities, service families, people wishing to build their own homes and Camden's traveller community; and
- i. require a range of dwelling sizes in accordance with Policy H7 Large and small homes.

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

- j. criteria in Policies H8, H9, and H10 where applicable;
- k. the character of the development, the site and the area;
- l. site size, and any constraints on developing the site for a mix of housing including provision for particular housing needs;
- m. the impact on creation of mixed, inclusive and sustainable communities;



- n. the impact of provision for particular housing needs on the efficiency and overall quantum of development;
- o. 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-let housing; and
- p. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

### High quality accessible homes

- 3.139 Many aspects of housing quality have a critical impact on the health and well-being of occupiers. These aspects of quality include the external environment, the condition of the property and its state of repair and decoration, accessibility, internal space and number of bedrooms, separation between functions such as kitchens, living rooms and bedrooms, adequate noise insulation, and daylight and sunlight and all of which can affect physical and mental health and influence life chances. The Council will therefore seek to secure a variety of high quality housing to meet the needs of different users, and will not sacrifice quality in order to maximise overall housing delivery.
- 3.140 Housing should be designed with regard to:
- relevant policies throughout the Plan, particularly Policy C6 Access for all, and policies relating to Protecting amenity, Design and Heritage, Sustainability and climate change and Transport;
  - our supplementary planning documents, known as Camden Planning Guidance, particularly Camden Planning Guidance on design, housing, sustainability, amenity and transport;
  - Supplementary Planning Guidance issued by the Mayor of London; and
  - Building for Life - the industry and government endorsed standard for well-designed homes and neighbourhoods.
- 3.141 Housing should also be designed to take account of changes in the age profile of Camden residents, and particularly the growth in the number of older people. One aspect of this is an increase in the number of people with dementia. Considering dementia when designing homes can help people to stay in their own homes as they get older. Helpful aspects include a focus on good natural light and lighting, safety, security, accessibility and ease of use.
- 3.142 London Plan Policy 3.5 indicates that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose and meet the changing needs of Londoners over their lifetimes. The Local Plan therefore encourages design of all new housing to provide functional, adaptable and accessible spaces. In addition, the Local Plan applies specific space standards to all proposals for new self-contained homes, and applies specific accessibility requirements to all proposals for new-build homes that are self-contained, as set out in the following paragraphs.



### Space standards

- 3.143 A high quality home should be designed to ensure sufficient space is available for furniture, activity and movement. The government has produced a 'nationally described space standard' which local plans can adopt to ensure that homes are designed with sufficient internal space. The standard sets out the minimum acceptable gross internal area in square metres depending on the number of bedrooms, the number of intended occupiers, and the number of storeys. The nationally described space standard was formally incorporated into the London Plan in March 2016 (Table 3.3 on page 103), and also forms part of Local Plan Policy H6.
- 3.144 The Mayor's Housing SPG advises that the nationally described space standard should be applied to all new dwellings, whether they are created through new-building, conversions or changes of use. Where dwellings will be created from conversions or changes of use, the Council will apply the nationally described space standard flexibly taking into account the constraints arising from conversion of existing buildings, particularly listed buildings and other heritage assets.
- 3.145 In accordance with the Mayor's Housing SPG, applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against Policy H6 requirements relating to space standards.
- 3.146 Specific arrangements apply to considering the standard of internal spaces in developments of specialist housing and housing with shared facilities. These are set out in paragraphs 3.159 and 3.160 of the Plan.

### **Accessible and adaptable dwellings (Lifetime Homes) and wheelchair user dwellings**

- 3.147 Lifetime Homes are dwellings specifically designed to support the changing needs arising through a family's lifecycle, incorporating features to help accommodate pregnancy, prams and pushchairs, injury, disability, and old age. These features also allow a dwelling to be easily adapted for even higher levels of accessibility in the future, if the need arises, allowing people to live in their own home for as much of their life as possible. Wheelchair housing is designed to more demanding criteria relating to ease of movement and activity and is intended to be easy to adapt for households that include someone who needs to use a wheelchair within the home.
- 3.148 Since 2006, the Council has been using planning policies to ensure that new homes meet Lifetime Homes criteria wherever possible, and that 10% of new homes meet wheelchair housing standards. Since 2010, the Council has also required any wheelchair housing provided for social rent to be fully fitted out to meet the needs of a future wheelchair user.
- 3.149 The government has produced optional Building Regulations which can be used to increase the accessibility of new build homes to people with mobility difficulties. Where accessibility requirements are warranted by local circumstances and are financially viable, the optional Building Regulations can be incorporated in local plan policy and applied to specific homes in a development through planning conditions. A requirement to comply with optional Building Regulations was formally incorporated into the London Plan in March in 2016, and equivalent measures are also included in Policy H6.
- 3.150 The optional Building Regulations in approved document Part M4 include Category 2 for "accessible and adaptable dwellings". This is known as M4(2), and is broadly equivalent to satisfying Lifetime Homes criteria. Approved document Part M4 also includes Category 3 for "wheelchair user dwellings" – known as M4(3). Part M4(3) further distinguishes between "wheelchair accessible" dwellings (homes readily useable by a wheelchair user at the point of completion) and "wheelchair adaptable" dwellings (homes that can be easily adapted to meet the needs of a wheelchair user).
- 3.151 Policy H6 includes a requirement for 90% of new build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair user dwellings). These requirements are consistent with the London Plan and apply across London. Information about where we will require "wheelchair accessible" dwellings and where we will require "wheelchair adaptable" dwellings is provided in paragraph 3.155.
- 3.152 Compliance with Optional Building Regulations can only be required by planning condition where Part M of the Building Regulations applies. Part M applies to new-build dwellings, but does not apply to dwellings created by changes of use or conversions of an existing building. Planning conditions can also only be used where all elements of the relevant Regulation can be achieved. They cannot be applied to a dwelling where step-free access cannot be achieved. Circumstances where a planning condition may be inappropriate include flats above or below the entry level in a building where incorporation of a lift would

not be viable. Information about the provision of lifts is contained in paragraph 3.48A of the London Plan and paragraphs 2.3.10 to 2.3.11 of the Mayor's Housing SPG.

- 3.153 In applying the requirement for 90% M4(2) accessible and adaptable dwellings and 10% M4(3) wheelchair user dwellings, the Council will round the number of homes required in each category to the nearest whole number such that the total requirement for M4(2) and M4(3) dwellings adds up to 100%. The Council will not require M4(3) wheelchair user dwellings as part of developments that provide five additional dwellings or fewer.
- 3.154 The Council will generally apply the requirement for 10% wheelchair user dwellings across each housing type or tenure in a scheme, seeking 10% of market housing, 10% of social-affordable rented housing and 10% of intermediate housing. We may seek to increase the percentage of wheelchair user dwellings in the social-affordable sector and reduce the percentage in the market or intermediate sectors, or both, where this will enable us to meet an identified need for wheelchair users in social-affordable housing.
- 3.155 In the market and intermediate sectors, we will use planning conditions to secure wheelchair user dwellings that comply with Part M4(3)(2)(a) requirements for "wheelchair adaptable" dwellings. Households that include a wheelchair user are much more likely to occupy social rented housing than other tenures, and the waiting list for wheelchair user dwellings far exceeds supply. In the case of social-affordable rented housing, future occupiers can be nominated from the Housing Register (waiting list), and from transfer lists. The Council will therefore require 10% of social-affordable rented housing in each development to be "wheelchair accessible" and be fully fitted-out for occupation by a household containing a wheelchair user. We will use planning conditions to specify those social-affordable homes that must comply with Part M4(3)(2)(b) requirements for "wheelchair accessible" dwellings.
- 3.156 The Council expects all new developments to be car free, where no provision for resident parking is made within the development or on the street (see Policy T2 Parking and car-free development). However, wheelchair users may need access to a car as a consequence of their disability. The Council will generally expect the parking needs of wheelchair users to be met on street, but may exceptionally seek suitably located and designed off-site parking to serve wheelchair accessible dwellings, particularly large wheelchair accessible dwellings (3 bedrooms or more).
- 3.157 In accordance with the Mayor's Housing SPG, applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against Policy H6 Housing choice and mix requirements relating to accessibility.
- 3.158 Specific arrangements apply to considering accessibility in developments of specialist housing and housing with shared facilities. These are set out in paragraphs 3.159 and 3.160 of the Plan.





### **Space and accessibility for specialist housing and shared housing**

- 3.159 The Mayor's Housing SPG advises that the nationally described space standard and the optional Building Regulations do not apply to specialist forms of housing such as student housing and care homes. However, the space needed for furniture, activity and movement should be considered when designing all forms of housing, and the Council will expect all proposals to provide adequately sized rooms and convenient and efficient room layouts that are functional and fit for purpose.
- 3.160 Houses and flats shared by 3-6 people who do not live as a family (small houses in multiple occupation, Use Class C4) can change to Use Class C3 without a planning application under the freedom provided in legislation. Proposals for homes in Use Class C4 should be designed to comply with Policy H6 in respect of space standards and optional Building Regulations if they are to benefit from the freedom to change to Use Class C3. Where homes in Use Class C4 do not comply with these aspects of Policy H6 we will consider using planning conditions to remove the freedom to change to self-contained homes. The Council has also agreed minimum standards for housing with shared facilities under the Housing Act 2004, please see Policy H10 Housing with shared facilities ('houses in multiple occupation') for more information.



## Variety of housing suitable for existing and future households

### Range of products including intermediate housing and Starter Homes

- 3.161 As indicated in paragraph 3.137 of the Plan, we will consider the opportunities presented by each site to contribute to the overall mix of housing types required to meet the general and particular needs of existing and future households. We will consider all the needs identified by Policy H6, including those addressed in detail by Policies H7, H8 and H9. The following paragraphs provide more information about particular needs that are not fully explained in other parts of the Plan.
- 3.162 The split between affordable housing and market housing will not secure housing suitable for households across a full range of incomes in Camden. There are wide gaps between the cost of housing at target social rents and the very cheapest privately rented housing, and between the costs of the cheapest private rented housing and the cost of entering owner-occupation. Local housing allowance (the benefit provided to help with private rents) is generally insufficient to cover the full cost of privately rented housing.
- 3.163 These gaps are particularly wide in the case of large homes (with 3 or more bedrooms) and there is a growing risk that middle-income households will be squeezed out of Camden by housing costs, particularly those with children. The outcome could be social polarisation between low income households in social-affordable rented accommodation and high income households in owner-occupation.
- 3.164 Intermediate housing is intended to bridge the gap between social-affordable rented housing and market housing. High capital values in Camden make it highly challenging to provide intermediate housing in the form of shared-ownership housing that meets the income thresholds set out in the London Plan. For intermediate housing to tackle social polarisation effectively, it therefore needs to include homes for intermediate rent and other innovative intermediate housing products that can be made affordable to a wider range of groups than homes for shared-ownership.
- 3.165 The Housing and Planning Act 2016 provides for the introduction of Starter Homes as a way to help first-time buyers who are at least 23 years old but not yet 40 to buy their own home at a discount price. Starter Homes should be offered at a discount of at least 20% below market value, and are subject to a price cap (in London the price cap has been set initially at £450,000, based on the average price paid by a first-time buyer).
- 3.166 The Housing and Planning Act 2016 requires councils to promote Starter Homes. The government has consulted on proposed Starter Homes Regulations that would require certain types of development to include a set percentage of Starter Homes. Policy H6 Housing choice and mix provides for the Council to comply with Starter Home requirements once they come into effect.
- 3.167 Further guidance on how the Council will seek a variety of intermediate housing types and comply with government requirements relating to Starter Homes will be included in as necessary in our supplementary planning document Camden Planning Guidance on housing.

### Private rented homes

- 3.168 Census data indicates that the share of households in private rented homes in Camden grew from 23.5% in 2001 to 32.3% in 2011, an addition of almost 10,000 households. In the same period, the share of households in social rented housing fell from 37.4% to 33.1%, a reduction of almost 2,000 households. The private rented sector is currently the largest source of housing for people who are not eligible for social rented housing and cannot afford to buy. Private renting is thought to play a significant role in limiting the social polarisation in the borough, and the Council will seek to actively foster the sector and support private tenancies for people in housing need.
- 3.169 Historically private rented homes have often been regarded as badly maintained properties suffering from overcrowding, hazards, poor facilities and insecure tenancies. The Council is actively working to improve the quality of accommodation in the private rented sector through the introduction of additional licensing (which provides for more inspection of privately rented houses in multiple occupation) and through the London Landlord Accreditation Scheme that the Council operates on behalf of authorities across the capital. We are also piloting our own local lettings agency, Camden Homes, which aims to provide an outstanding property management service for landlords and tenants.
- 3.170 The government and the Mayor are promoting the growth of a new development sector building homes specifically for private rent. Such a sector could potentially appeal to investors seeking a consistent long-term return, attracting a new source of finance into house-building, and also attract a new style of market developer involved in long-term management of the stock. We consider that build-to-let housing could potentially help to increase overall housing output in Camden, and could also help to fill part of the gap between social-affordable rent and owner-occupation. However, the turnover of occupiers of private rented housing tends to be rapid (particularly given its popularity amongst young adults and students), so localised concentrations could potentially harm the stability and sustainability of a community.
- 3.171 Build-to-let development may well attract less interest from families than development for market sale, and a different mix of dwelling sizes may be appropriate. Financial viability for build-to-let development is different from developments built for sale because returns are realised over a longer period, and may mean that the appropriate level of affordable housing provision is lower. The Council will be flexible in the application of affordable housing and dwelling size policies to development of build-to-let housing where we consider such housing will help to create mixed, inclusive and sustainable communities. We consider that build-to-let has the best potential to contribute to a sustainable community where occupiers are able to secure leases for longer periods such as 2-5 years, where a long-term commitment is in place to secure the management of the private housing element as rented accommodation, and affordable housing is provided on-site.

### Service families

- 3.172 The NPPF indicates that councils should plan for a mix of housing to meet the needs of various groups including the needs of service families. The government has made a number of commitments regarding housing members



of the armed forces, including a requirement for councils to give additional preference to seriously injured service personnel who have urgent housing needs, referral schemes with a number of housing associations, tailored low cost home ownership schemes and assistance for necessary adaptations for injured service people.

- 3.173 The 2011 Census suggests that there are approximately 160 service personnel living in Camden, around a quarter of whom live in communal establishments. Regent's Park Barracks is located in the borough, and is thought to be a home of a number of Camden's service personnel. Camden's Local Plan policies seek provision of affordable housing, including intermediate housing such as low cost home ownership, and seek housing to suit people with mobility difficulties and other support needs. We consider that the needs of members of the armed forces and their families can be met by giving them appropriate priority in the allocation of the housing intended to meet the needs of the wider community. Through the housing allocation scheme for social-affordable rented homes, the Council gives additional preference to current and former members of the armed forces with a recognised housing need. The Council has also included service families in its priority list for intermediate housing.

#### **People wishing to build their own homes**

- 3.174 The NPPF indicates that councils should plan to meet the needs of people wishing to build their own homes. This is understood to refer to self-build and custom-build arrangements where prospective occupiers substitute their own skills for some of the services usually provided by a speculative developer. Self-build generally refers to people who bring their own building skills to bear

as part of the construction process, whereas custom-build more often involves people who can provide professional services such as architecture or project management. In some cases custom-build can simply involve people who procure other professionals to build a bespoke home to personal specifications rather than a speculative home built to a standard design.

- 3.175 The London Strategic Housing Market Assessment 2013 (London SHMA) indicates that self-build provides 32% of new homes in Wales and 23% in Scotland, compared with only 4% in England, and possibly as little as 2.1% in London. The government envisages that self-build could be promoted in England as a way of increasing overall housing output.
- 3.176 The London SHMA suggests that typical self-build sites in London are small infill sites, end of terrace spaces, backland sites, gardens, garages and small industrial sites. Based on records of completed new-build housing schemes involving a single new home, the London SHMA estimates that self-build output in London from 2009 to 2013 amounted to between 1.9% and 3.5% of the total. The London SHMA notes a survey that has indicated 13% of Londoners appear to be researching self-build (similar to the national average) but only 2% are actively working towards acquiring a site, submitting a planning application or starting construction work. The London SHMA also documents some group self-build activity in London, usually in partnership with councils or registered providers such as housing associations. The London SHMA concludes that single unit self-build schemes are most likely to be practicable in low-cost parts of London, and group self-build has the best potential to deliver significant additional housing output in higher cost areas.
- 3.177 Land costs in Camden are extremely high, and the majority of housing output takes the form of flats built at relatively high densities. Consequently, the potential for people to acquire a site and use their own building skills to provide low cost homes is very limited. However, there is some evidence to suggest that custom-build for wealthier households is quite common in northern parts of the borough with a more suburban character. These sometimes involve infill sites and sometimes involve redevelopment of an existing residential plot. There may also be some interest in group self-build involving council-owned land, possibly in association with the Community Investment Programme.
- 3.178 Development monitoring records for Camden (2009/10 to 2013/14) show that an average of 40 additional homes per year were completed in single unit schemes (around 9.7% of the output of self-contained homes), although more research would be needed to determine how many of these involved speculative development. It seems likely that custom-build is making a significant contribution to Camden's housing output, albeit probably involving households with high incomes. With respect to the wider community the conclusions of the London SHMA are likely to hold good in Camden, with group self-build offering the best potential for significant additional output and for lower income households to be involved in building their own home.
- 3.179 The Self Build and Custom Housing Building Act 2015 passed in March 2015 requires councils to create a public register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. The Act also provides for government to issue regulations about what the register should include and how it should work. Late in 2015, the GLA launched a Build



Your Own London Home register, intended to run for one year and assist the GLA in assessing the level of interest in developing self-build and custom-build homes. The Council launched its own register for prospective self-builders in April 2016.

- 3.180 Through the Housing and Planning Act 2016, the government requires councils to give permission for enough serviced plots to meet the demand for self-build and custom-build homes. The Act also provides a mechanism for councils to seek an exemption from this requirement.
- 3.181 There are no large areas of unused, underused or cleared land in Camden that would provide an immediate opportunity to create serviced plots. Furthermore, self-build and custom-build housing are likely to involve low density development, which would make it very hard for a prospective self-builder to compete with other developers to acquire land, and would also represent an underuse of land in many parts of Camden, in conflict with Policy H1 Maximising housing supply. Given these constraints, the Council considers that the best prospect for bringing forward suitable land will be in conjunction with development of a large site involving other types of housing, and has made provision in Policy H6 for development of sites of 0.5 ha or greater to include serviced plots for self-build and custom-build.
- 3.182 There is no recent history of land in Camden being parcelled and sold in this way, so the strength of the market and land values that could be supported are uncertain. The Council may therefore allow developers to test that market before a decision is made on whether part of any particular site should be developed for serviced plots. Further guidance on how the Council will seek comply with government requirements relating to serviced plots will be included as necessary in our supplementary planning document Camden Planning Guidance on housing. Depending on the level of interest shown by registrations for self-build and custom-build and the extent of land available, the Council may also consider applying for exemption from elements of the Housing and Planning Act relating to serviced plots.



## Large and small homes

- 3.183 Policy H7 seeks a mix of dwelling sizes where the following types of housing are proposed:
- self-contained houses and flats (Use Class C3);
  - houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (small houses in multiple occupation or HMOs, Use Class C4); and
  - live/ work units, which are self-contained homes that include a dedicated work area (not in any planning use class, we will treat them as Use Class C3 when we apply Local Plan policies).
- 3.184 Policy H7 applies wherever there is development that affects the mix of dwelling sizes for these housing types, whether the development involves construction of new buildings, extensions, alterations, conversions or changes of use, or includes the creation of separate homes from ancillary residential accommodation. Other policies in this section provide more specific provisions relating to particular types of housing as follows:
- housing designated for occupation by older people, homeless people or vulnerable people – see Policy H8; and
  - housing that is generally restricted to occupation by students during term-time - see Policy H9.
- 3.185 Large and small homes are defined as follows:
- large homes are homes with 3 bedrooms or more; and
  - small homes are studio flats, 1-bedroom and 2-bedroom homes.
- (note – evidence on the need for homes of different sizes generally does not distinguish between studio and one-bedroom homes).

## Policy H7 Large and small homes

The Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

We will seek to ensure that all housing development, including conversion of existing homes and non-residential properties:

- a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and
- b. includes a mix of large and small homes.

We will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:

- c. the different dwelling size priorities for social-affordable rented, intermediate and market homes;
- d. any evidence of local needs that differ from borough wide priorities;
- e. the character of the development, the site and the area, including the impact of the mix on child density;
- f. site size, and any constraints on developing the site for a mix of homes of different sizes;
- g. 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-let housing; and
- h. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.

- 3.186 Camden's existing stock of homes is made up largely of relatively small dwellings, particularly homes rented from Housing Associations and the Council. The 2011 Census indicates that 70% of Camden households live in homes with two bedrooms or fewer, rising to 75% for households in social rented housing. The 2011 Census indicates that 11.7% of households overall are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 19.3% for households in social rented housing, and 5.7% for households in owner-occupation and shared ownership.
- 3.187 Census data shows that the average household size in Camden grew from 2.06 in 2001 to 2.18 in 2011. In the same period the proportion of 1-person households fell from 46% to below 41%. In 2011, Camden's household composition was 40.5% 1-person households, 42.6% households comprising one family only (including 19.0% with dependent children) and 16.9% other household types such as unrelated people sharing a flat. GLA household projections suggest relatively little change to this composition over the Plan period.
- 3.188 The Camden Strategic Housing Market Assessment (SHMA) calculates the likely requirement for homes of different sizes in the market and affordable sectors on the basis of the projected household composition over the Plan period, and the size/ tenure of dwelling that each household type is likely to occupy. The Camden SHMA indicates that the greatest requirement in the



market sector is likely to be for two- and three-bedroom homes, followed by one-bedroom homes/ studios. The greatest requirement in the affordable sector is likely to be for two and three-bedroom homes followed by homes with four bedrooms or more.

- 3.189 The Dwelling Size Priorities Table (Table 1) has been based on the outputs of the Camden SHMA, considered alongside the mismatch between the need for large affordable homes (indicated by overcrowding) and supply (indicated by average number of bedrooms per household) and the cost constraints on delivering large intermediate homes. Dwelling sizes are expressed in terms of number of bedrooms and distinct priorities are identified for market housing, intermediate housing and social-affordable rent.

**Table 1: Dwelling Size Priorities**

	<b>1-bedroom (or studio)</b>	<b>2-bedroom</b>	<b>3-bedroom</b>	<b>4-bedroom (or more)</b>
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

- 3.190 The Council acknowledges that there is a need and/ or demand for dwellings of every size shown in Table 1. We expect most developments to include some homes that have been given a medium or lower priority level. However, the Council has prioritised some sizes as high priority (primarily on the basis of a high level of need relative to supply). We will expect proposals to include some dwellings that meet the high priorities wherever it is practicable to do so. In the

social-affordable element we will give particular priority to large homes (with three or more bedrooms) at or around the level of guideline targets for social rents, as resources and development viability permit.

- 3.191 Having regard to criteria (c) to (h) in Policy H7, the Council acknowledges that it will not be appropriate for every development to focus on the higher priorities in the Table 1. However, we consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall, in accordance with clause (b). Where possible a mix of large and small homes should be included for both the social-affordable rented and the market housing. In accordance with clause (b) the Council will also generally resist development proposals for self-contained general needs housing that contain only one-bedroom and studio flats.
- 3.192 Between 2001 and 2011 an increase in the proportion of one-person households in Camden and a reduction in average household sizes was consistently anticipated by population projections and failed to materialise. This mismatch between expectations and outcomes suggests that projections around dwelling size requirements are fraught with difficulties, especially in the context of rapidly rising housing costs. Consequently, any more detailed percentage aims for specific dwelling sizes will be provided in our supplementary planning document Camden Planning Guidance on housing where they can be rapidly reviewed to reflect changing circumstances. Camden Planning Guidance on housing currently indicates that the Council will aim for at least 50% of social-affordable rented dwellings in each scheme to be large homes, and on the basis of mismatches in the existing stock we expect to retain this aim.
- 3.193 The Council will be flexible when assessing development against Policy H7 and the Dwelling Size Priorities Table. The mix of dwelling sizes appropriate in a specific development will be considered taking into account the character of the development, the site and the area. The following paragraphs set out a number of the relevant considerations. Please see our supplementary planning document Camden Planning Guidance on housing for further details.

#### **Character of the development, the site and the area, and child density**

- 3.194 Where a development involves reuse of an existing building, this may limit the potential to provide a range of dwelling sizes. Issues that can arise include the creation of access via an existing staircase or lift, respect for the integrity of existing structural walls and patterns of windows, changes in floor level, and significant features in heritage assets (including listed buildings and conservation areas) that may restrict alterations.
- 3.195 Flexibility around dwelling sizes may also be required to achieve rational layout and the best possible accessibility arrangements. Adjustments to the mix may be needed to satisfy design and amenity concerns, such as minimising noise disturbance between flats – see also Section 7 of the Plan on design and heritage. The Council is working to return vacant properties to use, and will use flexibility in Policy H7 to ensure that layout difficulties which limit the introduction of large homes do not prevent empty properties from returning to use, particularly upper floors above commercial premises.
- 3.196 Where a development is for the conversion of existing homes (including the creation of self-contained homes from residential accommodation that is





ancillary to another use), the Council will seek to minimise the loss of market homes with 3 bedrooms, particularly where the 3-bedroom homes have access to outside space. Conversions involving affordable housing should retain or re-provide any existing large affordable homes unless the creation of small homes will allow the release of other large affordable homes that are currently under-occupied. Conversions that involve the loss of existing homes should also comply with Policy H3 Protecting existing homes.

3.197

When considering the proportion of large homes appropriate within a specific development, we will take account of any features that make the development particularly suitable for families with children. We will also take into account the flexibility that larger dwellings create for other types of households, allowing for arrangements such as shared households and adults caring for elderly or infirm relatives. A number of features are listed here that help to make developments





suitable for children to live in, and where a number of these features are present we will expect the inclusion large homes, and particularly seek the inclusion of four-bedroom social-affordable rented homes. Child-friendly features include:

- the potential to provide space on site where children can play (open space or private amenity space);
- dedicated children's play space available nearby;
- a number of homes with direct access to the street, private amenity space or open space;
- no direct access to a major road;
- a limited number of homes served from each internal corridor and each communal staircase or lift; and
- potential to provide a broad range of dwelling sizes in the development appropriate for new families with very young children and established families with older children.

3.198 There are relatively few opportunities in Camden for housing development that will provide more than one or two of these features. The Council does not consider that the absence of any or all of these features justifies the omission of large homes from a development, and the all criteria in Policy H7 should be fully considered.

3.199 High child densities can cause difficulties in some circumstances, typically where large numbers of children in the same age-group grow up in an environment with limited safe external recreation space. We will take account of existing child densities in an area and the likely child density of the proposals, and consider whether mechanisms such as a sensitive lettings policy should be used to manage child density, or whether a reduced proportion of large homes would be appropriate.

**Development economics, financial viability, and demand**

- 3.200 As indicated in the paragraphs supporting Policy H1, the Council intends to be flexible in pursuit of its policy objectives, and will take into account the findings of our monitoring of housing supply in the light of economic circumstances. These paragraphs note specifically that the Council may vary the range of home sizes sought in order to maximise housing delivery.
- 3.201 Large affordable homes are expensive to build relative to their rental value and are challenging to provide under the current grant framework, but they are a high priority for the Council and the London Plan. The demand for market homes of different sizes can vary across the borough and change quite rapidly, so that small homes generate higher values per square metre in some circumstances, and large homes generate higher values per square metre in others. The Council recognises that the rigid application of dwelling size priorities can prejudice the financial viability of a development, and will consider adjusting the mix of dwellings (particularly the mix of market dwellings) in order to achieve the maximum reasonable amount of affordable housing floorspace on the site.
- 3.202 The Council may support development that exceeds our affordable housing target and provides affordable housing for a particular group e.g. intermediate housing designed to provide discount home ownership for first time buyers. When considering such proposals we will operate Policy H7 flexibly having regard to the needs and financial resources of the intended occupiers.

## Housing for older people, homeless people and vulnerable people

- 3.203 Policy H8 relates to all housing designated for occupation by older people (people who are approaching pensionable age or have reached it) and housing designated for occupation by homeless people and vulnerable people who need support to enable them to live safely. Such housing is often referred to as 'supported housing'.
- 3.204 Examples of types of housing designated for older people, homeless people or vulnerable people include:
- sheltered housing - clusters of accommodation where people live independently in self-contained homes where low intensity support is available, sometimes on-site (usually within Use Class C3);
  - extra-care homes – also independent living in self-contained homes, but designed to enable provision of higher intensity care as occupiers' needs increase, with on-site care usually available. On-site facilities may also provide support for older people in the wider community. Shared lounges and other social and leisure facilities are sometimes provided. Care home accommodation may also be included on-site (extra-care homes are usually within Use Class C3, but this may vary depending on the level of self-containment of the homes and the level of care provided);
  - care homes where higher intensity care is available 24 hours – commonly bedsit rooms with shared lounges and eating – this may involve residential care only, nursing homes staffed by qualified nursing staff, or dual-registered care homes where medical assistance is provided to occupiers that need it (care homes are usually within Use Class C2);
  - small supported living schemes – homes shared by no more than 6 people living as a household with support available, sometimes on-site (within Use Class C3); and
  - hostels occupied by people with a shared support need (typically more than 6 people), most commonly homeless people (hostels are outside any use class).
- 3.205 Policy H8 does not address homes that happen to be occupied by older people or people with support needs, but are not designated for use by these groups. Specifically, other policies deal with:
- hospitals, religious orders and boarding schools – see Policy C2;
  - hostels aimed at tourists and backpackers – see Policy E3; or
  - student housing – see Policy H9; or
  - houses, flats and other hostels shared by 3 or more occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (such as bedsits and hostels for migrant workers) – see Policy H10.
- 3.206 The term 'vulnerable people' refers to a very broad group of people who need some kind of support with their living arrangements. Examples include people using mental health services, people with learning disabilities, looked-after children/young people leaving care, people at risk of domestic violence, people with alcohol or drug dependencies, and ex-offenders. Often individuals

have multiple support needs, such people with both physical and learning disabilities, elderly people with a mental illness and homeless people with a drug dependency.

## **Policy H8 Housing for older people, homeless people and vulnerable people**

The Council will aim to ensure that there is a sufficient supply of appropriate housing available for older people, homeless people and vulnerable people to live as independently as possible.

We will support development of a variety of housing aimed at meeting the specific needs of older people and vulnerable people provided that the development:

- a. is needed to meet a demonstrable need within the borough and will be targeted at borough residents;
- b. will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and/or care;
- c. will be accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers;
- d. contributes to creating a mixed, inclusive and sustainable community; and
- e. does not cause harm to nearby residential amenity.

In accordance with Policy H4 Maximising the supply of affordable housing, the Council may seek affordable housing for older people or vulnerable people as part or all of the affordable housing contribution from developments that include housing and have capacity for 25 or more additional homes. In accordance with Policy H6 Housing choice and mix, we may also support the inclusion of housing for older people or vulnerable people where housing is proposed as part of a development with a site area of 0.5 ha or greater. In the case of any market-led development aimed at older people, homeless people or vulnerable people, particularly where the development contains self-contained homes, the Council will expect the development to make a contribution to the supply of affordable housing in accordance with Policy H4.

We will also support development that adapts or replaces existing provision for older people, homeless people or vulnerable people with housing better able to foster independent living and accommodate any changes in their support and care needs.

We will resist development that involves the net loss of housing floorspace for older people, homeless people and vulnerable people unless either:

- f. the existing housing is shown to be surplus to needs within the borough; or

- g. it can be demonstrated that the existing homes are incapable of meeting contemporary standards for the support and/or care of the intended occupiers; or
- h. adequate replacement accommodation will be provided that satisfies criteria (a) to (e) above; or
- i. the loss of floorspace is necessary to enable the development of housing for the same intended occupiers that satisfies criteria (a) to (e) above and is better able to foster independent living and meet any changes in their support and care needs; or
- j. the development will otherwise enable the provision of an alternative form of housing or support that better meets the objectives of this policy and the Local Plan.

Where the Council is satisfied that a development involving the loss of housing for older people, homeless people or vulnerable people is justified, we will expect it to create an equivalent amount of floorspace for an alternative form of supported housing, or for permanent self-contained housing for people with support needs or for general needs (in Use Class C3), including an appropriate amount of affordable housing, having regard to Policy H4.

- 3.207 Policy H8 covers homes for a broad range of people who need housing that is tailored to their specific circumstances and provides access to support or care. The numbers of people needing some form of support is expected to increase over time due to factors such as greater identification of conditions such as autism, and growing numbers of older people with longer life expectancy.
- 3.208 The Council is currently developing strategies to meet the needs of the various groups of people involved, but common themes across these groups are for the Council to provide support and adaptations that enable people to remain in their own homes or to live as independently as possible in more suitable homes. We aim to reduce the number of people who need to be placed in residential care homes outside the borough, and provide greater opportunities for older people and vulnerable people to live in suitable accommodation within Camden. We anticipate that most needs will be met by providing support for people to live in suitable homes in the general housing stock rather than in homes designed to meet particular needs, but there is likely to be a need for a limited amount of development for supported living.
- 3.209 Accessibility is often a key issue for older people and for vulnerable people. Accessible housing is required by many people of all ages with a physical disability, and a number of older people. We estimate that about 20% of people with learning disabilities also have mobility difficulties. The Council will seek to maximise opportunities for people to live independently in their own homes by ensuring that new homes are designed to be accessible and adaptable (the equivalent of Lifetime Homes) and that a proportion of new homes are wheelchair adaptable dwellings or wheelchair accessible dwellings (homes that are fully fitted out for occupation by a household containing a wheelchair user) in accordance with Policy H6 Housing choice and mix. We will also seek to ensure that there are some larger sized wheelchair accessible homes available for people who need to use non-standard wheelchairs. The Council also adapts



general needs housing to meet the specific needs of its occupiers. We will make better use of adapted and adaptable housing in our borough to meet the needs of people with physical disabilities including older people.

### Older people

- 3.210 Nationally, the number of people over 65 is forecast to grow dramatically over the next 20 years, and the number of people over 85 will more than double. This issue is less pronounced in Camden as the population profile is skewed towards young adults, nevertheless, the number of people aged over 75 is expected to increase from just over 11,000 to just over 16,000 during the Plan period.
- 3.211 The aging of the population could have a major impact on cost of care and support for older people. It is now widely recognised that the quality of life for older people can be increased and support costs reduced if more older people live in homes that can foster their independence but easily accommodate any support needs they may have as they age (e.g. Housing our Ageing Population: Plan for Implementation 2012, or HAPPI2).
- 3.212 We want to support older people to live independently in their own homes for as long as possible. As indicated in Policy H6 Housing choice and mix and supporting paragraphs, we will seek new housing that is accessible to people with mobility difficulties and wheelchair users, and encourage development of dementia-friendly homes (providing features such as good natural light and lighting, safety, security, accessibility and ease of use). We will provide advice and assistance to help people access housing and support that is right for their needs, including access to new technologies such as telecare. We will continue





to support older people to downsize to 'Lifetime Homes' and adapted homes that meet their needs. Where older people have support needs that are too great to be met in their existing home or an alternative home in the general housing stock, we will help them to move to accommodation designed for supported living. These moves may also free up larger homes for young families.

- 3.213 The Council will support development of co-housing where this is consistent with Policy H8 and other relevant policies of the Local Plan. Co-housing is created and run by residents to provide a community encompassing a range of generations. Through the provision of shared facilities, meeting and play areas co-housing can encourage social interaction and community care for younger and older people. We recognise that opportunities for co-housing in the borough are limited by the high cost of land and the limited availability of sites, but opportunities may be increased through the provision of serviced plots for people wishing to build their own homes under Policy H6 Housing choice and mix.
- 3.214 There are over 1,700 homes designated for older people to rent in Camden. These homes are primarily in sheltered housing schemes, but also include a small proportion of extra-care homes developed in the past five years. All are provided by the Council or Housing Associations. There are also two blocks providing sheltered homes to lease and several care homes providing for older people.
- 3.215 The London Plan sets an indicative benchmark for Camden to provide 100 additional homes per year specifically for older people, based on an estimated potential demand from 2.5% of households aged 65-74 and 15% of households aged 75 and over. The London Plan's indicative benchmarks suggest that only 15% of new provision in Camden should be for affordable rent and the

remainder should be for private sale and intermediate sale. The London Plan also suggests that there could be potential need across London for 400 – 500 additional care home places per year. The likely need for homes for older people in Camden has also been assessed using the Housing LIN Older People Resource Pack 2012. This modelling distinguishes between different support needs, but also suggests an aggregate need for 100 additional homes per year of which two-thirds should be homes to buy or lease.

### **Affordable housing for older people**

- 3.216 Extra-care housing is an effective way to facilitate people maintaining their independence while ensuring their care and support needs are met. The Council has brought forward four extra-care schemes across the borough (over 130 places), one in association with a new care home. We are also developing a further 38 extra-care places on a site near Chalk Farm incorporating a resource centre to support older people in the wider community. New places will be tailored particularly for high needs groups such as people living with dementia.
- 3.217 The Council has recently developed two new care homes for older people at Maitland Park and Gospel Oak (both registered for residential and nursing care), each providing 60 places. Together with new developments of extra-care housing, these care homes have replaced four older care homes that have now been decommissioned.
- 3.218 We anticipate that further needs for affordable housing for older people will be met primarily through redeveloping or reconfiguring the existing sheltered housing stock. Much of the existing stock will need modernising to better meet the needs of older age groups, and those requiring higher levels of support to maintain their health. In some cases it may be necessary to decommission some sheltered housing that cannot practically be modernised, and to develop housing for sale on some former sheltered housing sites to provide funding towards modernisation of the remaining stock.
- 3.219 If existing sites are unable to provide all the affordable housing required to meet the particular needs of older people, we will seek to negotiate additional provision as part or all of the contribution to affordable housing from developments that include housing and have capacity for 25 or more additional homes, in accordance with Policy H4 Maximising the supply of affordable housing.

### **Market housing for older people**

- 3.220 There is a growing market for leasehold housing designated for older people, although the supply in Camden is very limited at present. The resources older people have to access such accommodation vary considerably depending on whether they own their existing housing, any other assets and investments they have, and whether they have an occupational pension. The London Plan suggests that 65% of Camden's need for additional older people's homes is for homes for private sale and 20% is for homes for intermediate sale. The London Plan particularly encourages councils and other providers to support intermediate models that will provide low cost ownership to those who would otherwise be unable to access housing designed specifically for older people.



- 3.221 The Council recognises that older people can benefit from living in homes that are designed to foster independence whilst accommodating increasing support needs. However, the Care Act 2014 is underpinned by a principle of sustaining people in their own homes for as long as possible. Furthermore, a cap on personal contributions to residential care is due to be introduced under the Act, and this means any development that attracts additional care users into the borough could have a significant impact on Council resources. The Council will therefore support new development of housing for older people provided that it meets a demonstrable need to provide for existing borough residents and is targeted towards meeting that need. In accordance with Policy H1 and supporting paragraphs, we will seek to ensure that homes are marketed and available for sale in Camden for at least two months before they are marketed more widely. To help bring forward housing for older people in line with the London Plan's indicative benchmarks, on sites with an area of 0.5 ha or greater where housing is proposed, the Council may negotiate the inclusion of housing in a variety of tenures to meet the particular needs of older people, in accordance with Policy H6 Housing choice and mix.
- 3.222 The London Plan indicates that boroughs should apply the principles of their affordable housing policies to the range of housing for older people, including those in Use Class C2. Consequently, when considering market-led proposals for homes for older people to buy or lease, we will seek affordable provision in accordance with the principles set out in Policy H4 Maximising the supply of affordable housing. The Council acknowledges that arrangements for assessing affordability to people of pensionable age will be different from assessing affordability to people of working age, especially when housing costs include an element of care. We also recognise that this sector will have distinct viability characteristics, particularly where shared facilities and on-site support or care are provided. However, we will strongly encourage the providers to include a variety of tenures to suit older people from different backgrounds, including homes for intermediate sale. Where on-site provision would not be practical, we will seek off-site affordable provision for older people or for general needs, or exceptionally a payment-in-lieu.

### **Homeless people and vulnerable people**

- 3.223 The Council works to prevent homelessness, guide households into more settled accommodation, and operates a 'pathway' approach that gradually prepares single homeless people for independent living. Pathway services offer temporary accommodation and support in buildings ranging from large hostels to small supported housing schemes. Support can take a variety of forms: often, factors such as mental health problems or alcohol/drug dependency have contributed to homelessness. There is a specific Young People's Pathway, a Hostel Pathway and a Mental Health Pathway. For homeless families, the Council's focus is to reduce the need for temporary accommodation by helping families to settle into private rented housing.
- 3.224 There are currently 520 families living in temporary accommodation. The success of our homeless prevention work has meant that this number is slowly decreasing and we want to continue this work to find suitable long-term housing. We will work with individual families to find the right solution, taking into account

the cost of different types of temporary accommodation and making full use of suitable private rented sector housing. We will also seek to convert temporary accommodation into self-contained homes which can offer a long-term housing solution for homeless families.

- 3.225 The Council is currently providing supported living accommodation to approximately 300 people with mental health issues. Recovery outcomes are good, but movement through to settled accommodation is too slow, and around a fifth of people we are supporting are currently placed outside the borough. The Council aims to improve opportunities for people in need of support to receive the right level of care in appropriate accommodation, and to increase move-through rates for people ready to move on to more settled accommodation.
- 3.226 The Council provides a number of supported living schemes for people with learning disabilities within Camden. Some people with learning disabilities currently live in residential care out of borough. The Council intends to increase supported living opportunities in Camden for people with learning disabilities in independent homes across a variety of tenures.
- 3.227 The Council also has a new duty to provide services to people with autism spectrum behaviours. Many already receive support through the learning disabilities services or mental health services. We are considering advice and adaptations we can offer to better support people with an autism/asperger's spectrum diagnosis living in all tenures.
- 3.228 We anticipate that new provision for vulnerable people will be developed by the Council, by independent providers, and through partnership arrangements between them. In accordance with Policy H4 Maximising the supply of affordable housing, we may seek to negotiate affordable housing to meet the particular needs of vulnerable people as part or all of the contribution to affordable housing from developments that include housing and have capacity for 25 or more additional homes. In accordance with Policy H6 Housing choice and mix, we may also negotiate the inclusion of housing in a variety of tenures to meet the particular needs of vulnerable people where housing is proposed as part of a development with a site area of 0.5 ha or greater.

### **Assessing proposals for new provision**

- 3.229 Policy H8 sets out basic criteria for assessing housing proposals for older people and vulnerable people, including the appropriateness of the location. Key issues are the fit between the proposed facilities and the needs of the occupiers, and the facilities and social networks available in the surrounding community. Links to social networks are vital to prevent people in supported housing from becoming isolated, particularly older people.
- 3.230 In some parts of the borough there have been problems in the past where supported housing facilities such as homeless hostels have been too large or have been clustered together, becoming a focus of antisocial behaviour. A concentration of people who have high support needs can unbalance the social mix in an area, create noise and disturbance and damage the amenity and quality of life for other local residents and visitors. The location of and character of new provision should be such that antisocial behaviour can be controlled and occupiers can contribute to the balance and inclusiveness of community. Where



appropriate, the Council will use conditions and/or legal agreements to control the management of housing for people with support needs, and to specify the group or groups that it is intended to support.

### Protecting existing provision

- 3.231 In the context of the high land values and limited supply of development sites in Camden, sites that are currently used for supported housing represent an important resource. Such sites will tend to have a lower existing use value than general needs housing. They are likely to come under pressure for redevelopment for a higher value use, and once lost they will be very difficult to replace. Consequently, the Council will seek to retain these sites in supported housing use.
- 3.232 The amount and type of supported housing required in the borough is changing, for example less sheltered housing will be required for older people with low support needs and more extra care provision will be required for older people needing intensive support. Some of the Council's supported provision is in properties that are not suitable to meet contemporary needs, such as hostels for homeless people. Where supported housing is no longer suitable or needed to provide for a particular group of older people or vulnerable people, we will consider whether it could be remodelled or redeveloped to meet the supported housing needs of alternative group in the borough. We will also consider whether it could be redeveloped to provide self-contained housing for people in the borough with support needs.
- 3.233 Where supported housing is no longer suitable or needed for a particular group, and there are no suitable options to meet alternative needs for supported housing in the borough, we will expect the site to be developed for self-contained general needs housing. We will resist the use of supported accommodation in Camden to meet support needs arising outside the borough since the provisions of the Care Act 2014 mean that any development that attracts additional care users into the borough could have a significant impact on Council resources. In accordance with Policy H1 Maximising housing supply and Policy H3 Protecting existing homes , we will also resist the conversion of supported accommodation with shared facilities (such as hostels for homeless people) into alternative accommodation with shared facilities and short-stay accommodation (such as houses in multiple occupation and backpackers' hostels). Hostels do not fall into a planning use class, so the Council will regard any material change to the use (including a change to the type of occupier) as development.
- 3.234 When considering redevelopment for self-contained general needs housing, the Council will have regard to the criteria set out in Policy H4 Maximising the supply of affordable housing and any need to generate funding for replacement housing for older people, homeless people or vulnerable people elsewhere. If replacement supported housing is provided elsewhere, we will consider the proportion of affordable housing provided across both sites. We will resist proposals for non-residential development in accordance with Policy H3 Protecting existing homes and will seek to retain existing affordable housing in accordance with Policy H5 Protecting and improving affordable housing.

## Student housing

- 3.235 This policy particularly relates to housing that:
- is primarily occupied by students, and managed by an education institution or an independent provider;
  - is generally restricted to occupation by students during term-time;
  - is generally let to each occupier for the duration of an academic year, and not less than an academic term; and
  - provides some common facilities and/or services, although the extent of these can vary.
- 3.236 Other policies contain specific provisions for some kinds of housing that may be occupied by students:
- other houses and flats shared by 3 or more occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (houses in multiple occupation or HMOs) are considered in Policy H10;
  - key-worker accommodation such as nurses' homes and hostels are considered in Policies H4 and H5;
  - self-contained houses and flats are considered in Policies H2, H3, H4, H6 and H7; and
  - hotels, serviced apartments and hostels aimed at tourists and backpackers are considered in Policy E3.
- 3.237 In this plan the expressions "academic term" and "term" refer to a continuous period of classes or learning, whether the year is divided into two, three or four. The minimum length of a term is usually eight weeks.

### Policy H9 Student housing

The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.

We will seek a supply of student housing to meet or exceed Camden's target of 160 additional places in student housing per year and will support the development of student housing provided that the development:

- a. will not involve the net loss of 2 or more self-contained homes;
- b. will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year;
- c. will not involve a site identified for self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for self-contained housing;
- d. complies with any relevant standards for houses in multiple occupation (HMOs);
- e. serves higher education institutions that are accessible from it;
- f. includes a range of flat layouts including flats with shared facilities wherever practical and appropriate;

- g. has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole;
- h. will be accessible to public transport, workplaces, shops, services, and community facilities;
- i. contributes to creating a mixed, inclusive and sustainable community; and
- j. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity.

Where proposed student housing development is not robustly secured as student housing that provides accommodation affordable to the student body in accordance with criterion (g), the Council will expect the development to provide an appropriate amount of affordable housing for general needs having regard to Policy H4 Maximising the supply of affordable housing.

We will resist development that involves the net loss of student housing unless either:

- k. it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing;
- l. adequate replacement accommodation will be provided that satisfies criteria (a) to (j) above;
- m. it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere.

Where the Council is satisfied that a development involving the loss of student housing is justified, we will expect it to create an equivalent amount of floorspace in another permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing, having regard to Policy H4.

- 3.238 The number of students at London's universities has increased steadily from 2001-2011, and growth is expected to continue. Many education institutions of national and international significance are based in Camden, notably ten publicly funded universities. In addition, Camden has a number of other colleges that prepare young adults for higher education, and the Universities have advised that these colleges can support Camden's international academic reputation by helping them to attract students, particularly overseas students. The provision of higher education and research makes a major contribution to Camden's economy and is part Camden's wider Central London role as a focus of employment, shopping, culture and entertainment.
- 3.239 The 2011 Census indicated that 25,130 full-time students aged 18 over were resident in Camden during term-time, or 11.4% of the usual resident population. We estimate that by 2011/12, Camden had 8,500 places in housing provided specifically for students. This is generally consistent with the recommendation of the Mayor's academic forum that student accommodation should be available for around 33% of full-time students. Since 2011/12, more than 2,300 additional student places have been provided, and we estimate that the total had reached around 11,000 places by 2015.

- 3.240 The main alternative source of accommodation available to students in Camden is private rented housing. Depending on property size, median private rents in Camden have risen by 6% to 17% from mid-2011 to mid-2014 (based on VOA data in the GLA Rents Map, with the largest rises applying to homes with four or more bedrooms). The Council considers that the provision of additional designated student housing can help to limit additional pressure on the wider private rented market.
- 3.241 Camden provides the main base for a quarter of the publicly funded higher education institutions in London, and has experienced rapid growth in independently operated student accommodation in the last 10 years. We therefore expect a significant number of student housing schemes to come forward in the borough over the Plan period. Policy H9 sets out criteria that we will use to assess proposals involving student housing, including additions and losses. Details of how we will apply the policy are summarised below and set out more fully in our supplementary planning document Camden Planning Guidance on housing.

### Student housing target

- 3.242 Given the concentration of recent student housing development in Central London, the London Plan encourages a more dispersed distribution of future provision. Based on the London Plan position, the Council expects the provision of purpose-built student housing in Camden to grow in line with the growth of full-time student numbers across London, and expects the share of London's full-time 18+ students living in Camden to remain at around the same percentage.
- 3.243 The final report of the Mayor's Academic Forum in 2014 estimated that the need for additional places in dedicated student housing in London from 2011/12 to 2025/26 at 2,500 to 3,100 per year. The 2011 Census indicated that Camden was the term-time home of 4.7% of London's full time students aged 18 and over. Data on students registered at London's publicly funded higher education institutions in 2012/13 indicated that Camden's resident students were 6.6% of the London total. The mid-point of the two ranges suggests a London need for 2,800 places, and a Camden share of 5.65%.
- 3.244 We have estimated the need for additional student housing in Camden by multiplying the London requirement by the borough's share, giving a range of from 117.5 to 204.6 places per year. Taking the mid-point, we consider the minimum requirement for additional student housing over the Plan period to be 160 places per year, or 2,400 places in total. This minimum requirement forms our annual target in Policy H9. We recognise that the growth in student numbers and student housing demand may be higher, and Policy H9 therefore supports development to meet or exceed the target.
- 3.245 We consider that there are already identified sites with potential to provide more than 2,200 places in student housing from 2016/17 to 2030/31, which is over 90% of the student housing target. The Council's housing trajectory (included in the Local Plan as Appendix 2) indicates that Camden has a pipeline of sites with planning permission expected to deliver over 900 additional student housing places from 2016/17 to 2020/21. The pipeline represents sufficient deliverable sites to meet the target for student housing for the first five years of the Local





Plan period. Camden's Site Allocations Document 2013 and the Euston Area Plan also designate further sites where student housing could be developed, in most cases as part of a mixed-use scheme. The housing trajectory indicates that these represent sufficient developable sites to provide 1,300 places in student housing over the subsequent ten years of the Plan period. A full review of the Site Allocations document is expected to commence when the current Local Plan proceeds to adoption, and will identify any further sites needed to meet the student housing target in full over the entire Plan period.

- 3.246 In terms of student numbers, UCL is Camden's largest higher education institution. UCL seeks to provide guarantees to offer student housing places to all first-year undergraduate and postgraduate students, and forecasts a growth of 50% in its own students up to 2024/25. On that basis, UCL considers that even an additional 205 places in student housing in each year (the upper end of the Council's estimate of needs) would be a conservative target. Consequently, the Council will consult with UCL and other higher education institutions on a regular basis to review the actual growth in student numbers and need for additional places in student housing.
- 3.247 Student housing forms part of the Council's overall target of 16,800 additional homes over the Plan period (see Policy H1 Maximising housing supply). The overall target also encompasses our target for 11,130 self-contained homes and 480 vacant homes returning to use. Subtracting the targets for self-contained homes and reuse of vacant homes from the overall target leaves more than 5,000 homes that could potentially be provided as purpose built student housing over the Plan period, more than double the Policy H9 target. We therefore note



that there is considerable scope to accommodate a higher level of student housing provision in response to on-going consultation with higher education institutions.

### **Additional student housing and the priority for self-contained homes**

- 3.248 Policy H1 indicates that self-contained housing is the priority land use of the Plan, while Policy H3 Protecting existing homes resists proposals involving the net loss of two or more homes. Given this priority, we will resist proposals for student housing which involve redeveloping two or more self-contained homes, or the development of a site allocated for self-contained homes in the Camden Site Allocations document. We will also resist proposals involving the development of a site that has an existing consent for self-contained housing where the consented scheme would better meet Camden's housing needs and there is a reasonable prospect of the consent being implemented.
- 3.249 The Council separately monitors net additions to self-contained homes, student housing, and other non-self-contained homes. Over the last five years, approximately a third of the additional homes monitored have been spaces in student accommodation. As indicated in connection with Policy H1, the Council is concerned that pressure for development of additional student housing could severely constrain the availability of sites for self-contained housing. Consequently, the Council will resist proposals for student housing that would prejudice our ability to meet the annual target for additional self-contained homes, having regard to their impact on the supply of land for self-contained housing, whether we are meeting our cumulative target for additional self-



contained homes over the Plan period so far, and whether the sites involved have particular characteristics and constraints that make them more suitable for student housing or self-contained homes. In some cases, we may seek a mix of student housing and self-contained homes on the same site.

- 3.250 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation, 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. We will resist proposals for student housing that fail to comply with the relevant minimum standards.

### **The Institutions to be served**

- 3.251 London's publicly-funded Universities are part of the national and regional education infrastructure, support London's role as an international centre of academic excellence, and are a key part of the growing knowledge-based economy. Linking the student housing to publicly-funded Universities is a straightforward way for the provider and the Council to ensure that accommodation is only offered to bona fide students registered for an academic course of study. Where new student housing is proposed we will negotiate planning obligations to ensure that the term-time occupiers are students at one or more recognised institutions, which will generally be institutions supported by the Higher Education Funding Council for England (HEFCE).
- 3.252 There are a number of other colleges in the borough that help to support London's international academic reputation. The final report of the Mayor's Academic Forum 2014 estimated that 14% of London's full-time students could be at colleges of this type. In some instances the Council may support development of student housing by these colleges. Further information about how proposals will be considered is provided in our supplementary planning document Camden Planning Guidance on housing.
- 3.253 Student housing that is remote from the institution that it serves may have a significant impact on public transport services between the two sites. Consequently we will generally expect student housing developments to serve institutions that are within walking or cycling distance, or to be accessible to them by public transport with existing or committed capacity to meet the demand arising from the development. These are most likely to be institutions within Camden or the adjoining boroughs, although institutions in other locations may be acceptable if appropriate walking, cycling and/ or public transport links are available.

### **Affordability and range of accommodation**

- 3.254 The London Plan indicates that student housing should be affordable to the student body as a whole. The final report of the Mayor's Academic Forum 2014 highlighted affordability as an issue, noting that independent providers may charge £300 or more for a room, estimated at twice the rent that would be affordable on the basis of a student loan. The median rent for a studio flat in Camden in mid-2014 was £240 per week (VOA data in the GLA Rents Map).

The Council considers that additional designated student housing can help limit pressure on the wider private rented market, but to do so the rooms will need to be available at a rate that is competitive with the wider market.

- 3.255 To ensure that a proportion of student housing is available at competitive rates, we will:
- expect student housing developments to include a range of flat layouts including clustered study-bedrooms with some shared facilities wherever this is practical and appropriate (having regard to any constraints on the site or the development and any specific characteristics of the proposed occupiers);
  - prevent lease or sale of the accommodation as general market housing;
  - wherever possible expect undertakings with one or more education institutions to tie occupation to students attending the specified education institutions or; and
  - where undertakings are not in place with specific institutions, subject to viability expect student housing developments to include an element of student accommodation that is affordable in the context of average student incomes and rents for comparable accommodation provided by Camden based Universities.
- 3.256 Where affordable student accommodation is expected, we will be guided by the Mayor's Housing SPG (as updated in Annual Monitoring Reports) in negotiating the proportion of affordable housing and its cost, and in making arrangements for its allocation. The SPG suggests that the cost should be no more than 55% of average student income for a UK full-time student living in London away from home, and suggests that the proportion of affordable housing can be set having regard to the financial viability of the development and the proportion of all students receiving a maintenance grant for living expenses (around 30% in 2013). In accordance with the SPG, planning obligations will be used to secure the affordability and availability of the affordable accommodation for as long as the student housing use continues.
- 3.257 The optional Building Regulations intended to secure accessible homes do not apply to student housing. Nevertheless, in accordance with Policy H6 Housing choice and mix, the Council will seek housing suitable for people with disabilities, and will expect a proportion of accommodation in student housing developments to be suitable for occupation by students who are wheelchair users, having regard to the proportion of wheelchair users among the student body and the wider population.
- 3.258 The Council will use design mechanisms, conditions and planning obligations to meet these expectations, and provide additional details of how they will operate in our supplementary planning document Camden Planning Guidance on housing.

### **Location of student housing and provision for travel**

- 3.259 In two of Camden's Central London wards, students now account for around a third of the population (Census 2011, 18+ full-time students at term time address as a share of usual resident population). Consequently, the Council supports the proposal for greater dispersal of additional student housing in the London Plan,



both within the borough and more widely through London. However, a number of factors will be considered when assessing whether locations are appropriate for student housing.

- 3.260 Like all housing, student housing should be located so it that its occupiers have access to public transport, workplaces and services. The advent of UK student loans has made access to workplaces all the more important, as almost a fifth of Camden's full-time students are in employment (Census 2011, 18+ students at term time address). Services such as GPs and sports facilities are also more likely to be required for locations remote from campus based provision in Central London.
- 3.261 Student housing can have a significant impact on a single public transport route or service, particularly where development towards the north of the borough serves the cluster of Universities in Bloomsbury and the Central London Area. Consequently we will expect student housing to be designed to prioritise walking and cycling, with accessible and secure cycle parking facilities provided in accordance with Policy T1 Prioritising walking, cycling and public transport. Student housing should also ideally be located within cycling distance of the institutions it serves, or otherwise be accessible to them by public transport services. Public transport and other services that will support new student housing should have existing or committed capacity to accommodate the demand generated by the development. Funding towards services may be sought through planning obligations or CIL as appropriate.
- 3.262 The creation of mixed, inclusive and sustainable communities can be a particular consideration where student housing is proposed, especially given the high concentrations in some parts of Camden. Students are sometimes perceived as short-term residents with little connection to the established



community. Specific concerns can include noise disturbance, over-crowding on public transport, or the loss of shops and services that meet the needs of longer term residents. The Council will therefore assess proposals for student housing having regard to any existing concentrations in the area, and the wider housing mix in the community. Where the scale or concentration of student housing proposed is likely to harm the balance and sustainability of the community or otherwise harm local amenity, the Council will seek a range of mitigating measures such as management plans, and will resist proposals where mitigation is not possible.

### **Protecting existing student accommodation**

- 3.263 Given the anticipated growth of full-time students attending higher education institutions in the borough and the potential for pressure on the wider private rented stock, we will seek to protect existing student housing, including housing managed by education institutions and independent providers unless it is replaced or there is no longer a demand for it. Where the loss of student housing is justified, alternative development should provide an equivalent floorspace in another permanent housing use in accordance with Policy H3 Protecting existing homes. Development could potentially provide housing for people with support needs in accordance with Policy H8 Housing for older people, homeless people and vulnerable people, and/ or provide self-contained housing in accordance with our priority set out in Policy H1 Maximising housing supply. In all cases we will expect an appropriate contribution to affordable housing in accordance with Policy H4 Maximising the supply of affordable housing.
- 3.264 Within Camden there is a modest supply of housing with shared facilities which is available to young people and visitors on a short or longer-term basis, usually run by charities and religious institutions. Such housing can be a valuable resource for students arriving in London for the first time, and in some cases is largely occupied by students. However, where this housing is not managed by an education institution or restricted to occupation by students during term-time, we will assess proposals involving its loss on the basis of Policy H10 Housing with shared facilities ('houses in multiple occupation') rather than Policy H9.



## Housing with shared facilities ('houses in multiple occupation')

- 3.265 A house with shared facilities or a house in multiple occupation generally refers to a flat or house that is the main residence for three or more occupiers forming two or more households and who share a kitchen, bathroom or toilet. A household is generally a family (or people with relationships equivalent to a family). The properties covered by Policy H10 mostly take the form of homes let to a group of friends, homes let room-by-room to unrelated individuals, or properties formally divided into bedsits, but also include other types of accommodation where facilities are shared if the occupiers live there long-term (e.g. hostels for migrant workers).
- 3.266 Policy H10 specifically relates to types of housing such as:
- houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (small houses in multiple occupation or HMOs, Use Class C4) – although different policies apply in different circumstances as set out in paragraph 3.268;
  - houses or flats shared more than six occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (large houses in multiple occupation or HMOs, outside any planning use class); and
  - other accommodation with shared facilities where people live long-term (outside any planning use class), often designated for particular groups, but excluding designated student housing and housing for older people, homeless people and vulnerable people.
- 3.267 Other policies contain specific provisions for some kinds of housing with shared facilities:
- key-worker accommodation such as nurses' homes and hostels is considered in Policies H4 and H5;
  - housing for older people, homeless and vulnerable people is considered in Policy H8;
  - student housing is considered in Policy H9;
  - self-contained houses and flats occupied by a single household are considered in Policies H2, H3, H4, H6 and H7; and
  - provisions for hotels, serviced apartments and hostels aimed at tourists and backpackers are considered in Policy E3.
- 3.268 For most purposes we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3), to reflect the freedom provided in legislation for changes between these two uses without a planning application. However, where new small homes in multiple occupation are proposed in order to create a long-term addition to the supply of low cost housing, we will consider using planning conditions to remove the freedom to change to self-contained homes without an application. Where the freedom to change from Use Class C4 to Use Class C3 has been removed (e.g. by a planning condition) we will apply Policy H10 and resist the loss of small houses in multiple occupation.

- 3.269 The preceding paragraphs should not be regarded as providing detailed definitions or accounts of the legal position. Planning use classes are set out in The Town and Country Planning (Use Classes) Order 1987 (as amended). Provisions relating to licensing of some types of housing are set out in the Housing Act 2004 and related secondary legislation.

### **Policy H10 Housing with shared facilities ('houses in multiple occupation')**

The Council will aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with limited incomes and modest space requirements.

We will support development of housing with shared facilities (houses in multiple occupation) provided that the development:

- a. will not involve the loss of two or more self-contained homes;
- b. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it is shown that the site is no longer developable for self-contained housing;
- c. complies with any relevant standards for houses in multiple occupation;
- d. contributes to creating a mixed, inclusive and sustainable community;
- e. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity; and
- f. is secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing, having regard to Policy H4 Maximising the supply of affordable housing.

We will resist development that involves the net loss of housing with shared facilities (houses in multiple occupation) or the self-containment of any part of such a housing unless either:

- g. it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities; or
- h. adequate replacement housing with shared facilities will be provided that satisfies criteria (a) to (f) above; or
- i. the development provides self-contained social-affordable rented homes.

Where the Council is satisfied that a development involving the net loss of homes with shared facilities is justified, we will expect it to create an equivalent amount of floorspace for permanent self-contained housing (in Use Class C3), secured as a long-term addition to the supply of low cost housing, or otherwise providing an appropriate amount of affordable housing, having regard to Policy H4.

- 3.270 The 2011 Census identified 700 homes in the borough that are shared by separate households, providing homes for over 3,000 individuals or households in total. These are likely to be primarily properties where rooms



are let separately to unrelated individuals. On the basis of housing stock data, we estimate that at least 2,300 further homes are being shared by groups who do not form a family. The 2011 Census recorded more than 31,000 households living in privately rented accommodation, of whom over 8,000 are multi-adult households, and it is likely that more than a quarter of private renting households are in a home where they share facilities with one or more unrelated individuals .

- 3.271 Data from the London Rents Map (May 2014) indicates that in Camden rents for a room are typically around 70% of the cost of a studio flat and 50% of the cost of a 1-bed flat. Consultation on Camden's private rented sector suggests that significant proportions of shared accommodation are occupied by students, single males, 40 to 60 year olds, and people who are low wage earners or unemployed. Few single people and couples without children are eligible to be housed by the Council. Single people under 35 can only claim for the cost of a bedsit or room in shared accommodation. Many of the households in shared accommodation would not be able to access or afford self-contained accommodation.

### **Additional housing with shared facilities**

- 3.272 Given that planning legislation provides freedom for changes in either direction between self-contained homes in Use Class C3 and small houses in multiple occupation in Use Class C4, the sector has scope to expand and contract in accordance with relative demand in each sector. Consequently, aside from housing designated for particular groups (such as students and older people), the Council does not currently anticipate a significant number of proposals for development creating new homes with shared facilities. Nevertheless,



given the rapid growth of the private rented sector in the borough there is certainly potential for new types of shared accommodation to emerge, such as accommodation modelled on student housing but available to a wider range of occupiers. Consequently Policy H10 provides criteria for assessing such proposals. Further details will be provided in our supplementary planning document Camden Planning Guidance on housing as appropriate.

3.273 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 two or more homes. Given this priority, we will resist proposals for houses in multiple occupation which involve redeveloping two or more self-contained homes, or the development of a site allocated for self-contained homes in the Camden Site Allocations document. We will also resist proposals involving the development of a site that has an existing consent for self-contained housing where the consented scheme would better meet Camden's housing needs and there is a reasonable prospect of the consent being implemented. With the exception of student housing, there is no recent history in Camden of significant new build development for homes with shared facilities, and no reason to suppose that it will prejudice the Council's ability to meet our target for additional self-contained homes.

3.274 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation and other homes with shared facilities. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. We will resist proposals that fail to comply with the relevant minimum standards.



- 3.275 We will consider whether proposals could reduce mix, inclusivity and sustainability of a neighbourhood, for example whether large-scale accommodation or additions to an existing concentration could skew the population towards particular groups or lifestyles. We will also consider the potential for harm to nearby residential amenity, for example from residents congregating in outside areas close to other homes. Where appropriate we will seek a planning obligation to protect amenity, for example by securing a management plan.
- 3.276 The Council's priority land-use is self-contained housing, which is generally required to provide affordable housing. Policy H10 therefore includes measures to ensure that financial viability is not tilted towards development of housing with shared facilities. We support continued provision of housing with shared facilities for people with low incomes, and where proposals are intended for low-income occupiers we will negotiate planning obligations to ensure that housing is available to low income occupiers in the long-term. However, new forms of housing with shared facilities could potentially be aimed at providing high density Central London living for relatively wealthy young people, with facilities such as gyms, swimming pools and restaurants. Where proposals come forward that cannot be secured for low income occupiers, we will seek provision of an appropriate amount of affordable housing in accordance with Policy H4 Maximising the supply of affordable housing taking account of the additional residential floorspace proposed and its capacity for self-contained homes.

### Existing housing with shared facilities

- 3.277 The Council protects housing with shared facilities because many individuals and couples in Camden would be unable to access or afford anything else (as referred to in paragraph 3.271). Despite this protection, there are some indications that the number of homes with shared facilities has diminished in recent years. Estimates based on the Private Sector House Condition Survey 2004 suggest that 11,000 households were living in bedsits or other shared accommodation, predominantly in the private rented sector. More recent housing stock data suggests that this number could have halved (see paragraph 3.270). Developments leading to a loss of housing with shared facilities have tended to involve either self-containing the existing bedsits (putting pressure on internal space by adding facilities for personal use), converting the property into larger flats, or creating a single large dwelling for one household.
- 3.278 The gap between rents for studio flats and rents for rooms in shared accommodation indicates that rents for bedsits will increase as a consequence of self-containment (not necessarily rents charged to existing tenants, but certainly rents charged to new ones). Self-containing bedsits therefore reduces the amount of accommodation available to single people and couples with the lowest incomes. Self-containment also tends to involve the loss of access to previously shared spaces, such as kitchens, sitting rooms or gardens, laundries and drying areas, and bathrooms containing a bath. However, the bedsit itself is rarely large enough to contain a full range of facilities, or to provide space to socialise with visitors.
- 3.279 The Council's minimum space standards for houses in multiple occupation, set under the Housing Act 2004, provide for single rooms as small as 9sqm and



double rooms as small as 11sqm. Additional space is required where kitchen facilities, baths/ showers or toilets are provided in the room so that occupiers can move around and use them safely. The Council's standards would require at least 4.2sqm to be added if the room contains kitchen facilities, a wash basin, a shower and a toilet, but this would not be sufficient for all the facilities tenants would often expect, such as freezers and washing machines. The Government's nationally described space standard is much more demanding, with 37sqm given as the minimum standard for a self-contained flat. The limited space in existing bedsits means that self-containment tends to create hazards, such as conflict between cooking facilities and beds or doors.

- 3.280 Converting a home with shared facilities into a single large dwelling or a number of flats larger than the existing bedsits would reduce the amount of accommodation available to small households on low incomes, and would also be likely to reduce the number of people occupying the property. Homes with just one room for sleeping tend to be the most densely occupied as they have no further bedrooms to leave vacant. Camden's Survey of New Housing 2002-2008 did not include bedsits, but found that the number of occupiers per bedroom for studio and 1-bedroom homes was significantly higher than the number in larger homes. Notably, 3-bedroom homes had an average of less than one occupier per bedroom.
- 3.281 Nevertheless, the Council is actively working to improve the quality of accommodation in the private rented sector, particularly houses in multiple occupation. Where such properties do not meet current standards, are in serious disrepair, or have a history of vacancy, we will assess the form of renovation or development best able to provide residential accommodation of reasonable quality, and may accept self-containment in some circumstances. The Council will consider the extent of the works required to meet contemporary standards, their likely impact on any designated heritage assets, the cost of restoring the property to use (having regard to any fixtures and fittings removed from the property by the owner), the potential rental return from the property, and the prospect of investment coming forward to make the property suitable for occupation as housing with shared facilities.
- 3.282 In the past, Camden's policies for development of self-contained homes have required provision of affordable housing, but no similar policies have applied to housing with shared facilities. Consequently where we consider that proposals for self-containment of shared accommodation are the best option, we will seek appropriate provision of affordable housing or other low cost accommodation. The Council will generally favour solutions that secure long-term provision of housing suitable for small households with limited incomes. Where there is a long history of vacancy we may agree arrangements that secure the availability of some or all of the property for homeless or vulnerable people for a fixed period. Where we are unable to secure properties that have been self-contained as low cost housing for small households, homeless people or vulnerable people, we will seek an appropriate contribution to affordable housing in accordance with Policy H4 Maximising the supply of affordable housing. Further details will be provided as necessary in our supplementary planning document Camden Planning Guidance on housing.

- 3.283 Proposals to replace existing bedsit accommodation, or other housing with shared facilities, usually involve relocating it into an existing self-contained dwelling, and converting the shared accommodation into one or more larger self-contained homes. Such swaps can help a developer or owner to meet a demand for self-contained accommodation in a particular location, provide bedsits in a property that can more easily meet contemporary standards, and/or maximise the value of properties in their control. The Council will not resist such swaps as long as the replacement bedsits are in an appropriate location, represent equivalent or better accommodation (in terms of the number of bedsits, the floorspace, and the standard of facilities and amenities), and are secured by a planning obligation.
- 3.284 There is a small stock of social rented housing in the borough that takes the form of bedsit rooms with communal facilities. Small homes are over-represented in this sector, and bedsits are very unpopular with tenants, especially since they will be sharing facilities with people they don't know, often people classed as vulnerable people and sometimes people with challenging behaviour. The Council therefore supports development or remodelling of social rented accommodation with shared facilities to create self-contained social-affordable rented homes, subject to the self-contained homes meeting appropriate space standards.
- 3.285 In some cases, properties in Camden have been subdivided into flats that are not self-contained because the layout of entrance halls and staircases made self-containment difficult or costly. Where these properties are not let out as bedsits and only share circulation spaces, they do not form housing with shared facilities, and the Council will not resist proposals to convert the properties into wholly self-contained flats provided that they are able create homes of a reasonable layout and quality. Where such proposals would result in a loss of homes, they will be considered against Policy H3.

## Accommodation for travellers

- 3.286 For planning purposes, the government's 'Planning policy for traveller sites' (revised August 2015) sets out definitions of travellers, gypsies and travellers, and travelling showpeople. In summary:
- 'Travellers' means 'travelling showpeople' and 'gypsies and travellers';
  - 'Travelling showpeople' are members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such);
  - 'Gypsies and travellers' are other persons of nomadic habit of life whatever their race or origin;
  - in all cases, people are still included if they have ceased to travel temporarily, for example due to health or education needs.
- 3.287 There is an established community of travellers in Camden that has lived in the borough for over twenty years. The Council recognises that this community has longstanding connections with local social networks and services. The Council currently provides five travellers pitches in Camden (four at Carol Street and one at Castlehaven Road). There is also a private site providing a five plots for travelling show people (the North Fairground Site at the Vale of Health). The Council will protect these sites from change to alternative uses unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations, or are demonstrably no longer needed. The Council will also seek to plan for the existing and future accommodation needs of Camden's established traveller community.
- 3.288 Providing suitable accommodation for the established traveller community will help us to deliver the Camden Plan objective of tackling inequality and creating sustainable and resilient neighbourhoods by relieving the community's overcrowding, improving travellers' health and wellbeing and improving potential for children and young people to take advantage of education and training opportunities. Providing suitable accommodation will also help us to ensure the right housing for Camden's diverse communities in line with the recommendations of the Equality Taskforce.

### **Policy H11 Accommodation for travellers**

The Council will aim to secure a sufficient supply of pitches/ plots to meet the existing and future needs of Camden's established traveller community.

We will protect existing lawful sites, plots and pitches for travellers. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, pitches and/or plots in suitable locations, or are demonstrably no longer needed.

We will identify deliverable sites to meet or exceed Camden's projected need for seven additional pitches for the established traveller community by 2020/21 and seek to identify developable sites or broad locations to meet Camden's projected need for a further nine additional pitches by 2030/31.

New sites, pitches and/or plots for travellers should:

- a. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
- b. be capable of connection to energy, water and sewage infrastructure;
- c. provide safe access to and from the main road network;
- d. support the health and wellbeing of the occupiers;
- e. provide an appropriate layout and facilities;
- f. be attractive and of the highest design quality; and
- g. protect local amenity and the environment.

### Assessing needs

- 3.289 The Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014 (the Accommodation Assessment) indicated that 16 additional pitches will be required for Camden's established traveller community by 2031. This is made up of households on the waiting list for pitches and the anticipated growth in the number of households from 2013 to 2031. Households on the waiting list include a number of households who currently live on an overcrowded site and do not have their own pitch, and a number of households who currently live in bricks and mortar homes.
- 3.290 The government's 'Planning policy for traveller sites' has been revised since the Accommodation Assessment was completed, and the Assessment is not fully consistent with all aspects of the policy. The Accommodation Assessment does not establish whether all the households on the waiting list and in bricks and mortar homes have a housing need or a nomadic habit of life. Consequently, the Council will engage with the established traveller community, representative bodies, support groups and the wider community to consider whether an updated assessment should be carried out, and what form it should take. In the interim, the Plan adopts the full need for additional pitches from the Accommodation Assessment, namely seven additional pitches by 2021 and a further nine additional pitches from 2021-31, to give a total of sixteen additional pitches minimum over the whole period.
- 3.291 The Accommodation Assessment also considered the need for transit sites (sites for travellers who are visiting or passing through an area) and the needs of travelling showpeople. The Accommodation Assessment concluded that there was no evidence of major travelling routes through Camden that would generate any need for a transit site. The Assessment also found that two of the existing plots for travelling showpeople are unoccupied and there is no evident need for additional plots.

### Site allocations

- 3.292 To comply with the government's 'Planning policy for traveller sites', the Council should identify a supply of specific deliverable sites to meet needs for the first five years of the Plan period (deliverable sites are suitably located, available now, viable to develop, and have a realistic prospect of delivery within five years). The Council should also identify a supply of specific developable sites or



broad locations for growth for the subsequent 5-10 years (developable sites are suitably located and have a reasonable prospect of being available and viable to develop at the time envisaged).

- 3.293 The Council adopted the local development document Camden Site Allocations in 2013. As part of preparation of the Site Allocations document, the Council attempted to identify sites to meet the needs of Camden's travellers identified by the London Gypsy and Traveller Accommodation Needs Assessment 2008. By the time of adoption, the Site Allocations process has been unable to identify deliverable or developable sites for travellers, and the 2008 Needs Assessment was no longer up-to-date. Consequently the Council commissioned the new Accommodation Assessment published in 2014, and indicated through the Local Development Scheme that it would identify sites for travellers by obtaining planning permissions and/ or through review of the Site Allocations document.

### **Meeting immediate needs**

- 3.294 A full review of the Site Allocations document is now expected to commence when the current Local Plan proceeds to adoption. The reviewed Site Allocations document will identify sites for travellers' accommodation but will not reach adoption for some years. The most realistic source of deliverable sites for the first five years of the Plan period is for the Council to reserve sites in its ownership for future provision of traveller accommodation. We have established a process for assessing the suitability of all sites within the Council's ownership, and begun to examine feasibility. Through this process, we aim to identify sufficient land to accommodate seven traveller households. The land is likely to take the form of a number of small sites rather than a single large site.
- 3.295 Once Council-owned sites have been identified, we anticipate that the Council will decide formally which sites should be reserved so that they cannot be sold or developed for an alternative permanent use. Reserved sites will then be taken forward through planning permissions or inclusion in the reviewed Site Allocations document. If sufficient Council-owned sites have not come forward to meet needs for the first five years of the Plan period, we will seek to make good the shortfall in the reviewed Site Allocations document.
- 3.296 Travellers commonly live on pitches providing for a static caravan supported by an amenity block, but the Council will engage with the established traveller community, representative bodies and support groups to explore whether the needs of some traveller households could be met by alternative forms of accommodation that support their lifestyle. One possible model is a lightweight 'chalet' construction providing living accommodation accompanied by a hardstanding area for a touring caravan. As part of the site assessment process, we will consider whether there is an acceptable form of accommodation that would allow existing sites to be used more intensively.

### **Meeting longer-term needs**

- 3.297 To meet needs for traveller accommodation after the first five years of the Plan period, we will seek to identify sufficient suitable sites through the Site Allocations process. Given the connection between Camden's gypsy and

traveller community and local support networks, we will particularly explore the potential for sites located broadly in the same areas of the borough as the existing sites.

### **Assessing proposals**

- 3.298 We will aim to ensure that new sites/ pitches are both adequate and appropriate to the needs of the gypsy and traveller communities and integrated with adjoining communities. All proposals for sites, plots and pitches for gypsies, travellers and travelling showpeople, whether identified by the Council or proposed independently, should meet the criteria set out in Policy H11 and the requirements of the government's 'Planning policy for traveller sites'. Proposals will also be expected to satisfy all other relevant Local Plan policies, including those relating to the impact of development and the protection of green infrastructure.

### **Monitoring and review**

- 3.299 The Council will keep the accommodation needs of travellers under review, taking into account any changes to national or regional policy and guidance, and any considerations that emerge from ongoing cross-boundary cooperation. We will seek to maintain an up to date understanding of needs, including the numbers of households who live in unsuitable housing and have a nomadic habit of life, and the forms of accommodation that might be considered suitable. We will engage with the traveller community, representatives and support groups to consider whether an updated Accommodation Assessment should be carried out, and what form it should take.
- 3.300 Once a supply of deliverable sites has been identified, the Council will keep this under review and update it annually to maintain sufficient sites to meet Camden's assessed needs for traveller accommodation for the following five years.

# 4. Community, health and wellbeing

## Health and wellbeing

- 4.1 Camden has one of the largest health inequality gaps between occupational groups in England for both men and women and there are stark geographical health inequalities in Camden. People suffering from poor general health, mental ill health and low life expectancy are generally concentrated in the borough's most deprived wards including St Pancras and Somers Town, Haverstock and Kilburn. In contrast, residents in the most affluent parts of the borough have longer life expectancy, better general health, and fewer mental health problems than the England average.
- 4.2 There is an important link between the physical and social environment in which we live and how healthy we are, both physically and mentally. This policy seeks to ensure that development in Camden considers local issues relating to health and wellbeing at an early stage of the planning process in order to positively improve outcomes for the people who live, work and visit the borough.

### Policy C1 Health and wellbeing

The Council will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities.

Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate.

The Council will require:

- a. development to positively contribute to creating high quality, active, safe and accessible places; and
- b. proposals for major development schemes to include a Health Impact Assessment (HIA).

We will:

- c. contribute towards the health priorities of the Health and Wellbeing Board and partners to help reduce health inequalities across the borough;
- d. support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements; and
- e. protect existing health facilities in line with Policy C2 Community facilities.

### Health and wellbeing in Camden

- 4.3 The Camden Health and Wellbeing Board (HWB) brings together the NHS (Camden GP Clinical Commissioning Groups), local authority cabinet members, public health, other local authority directorates and Healthwatch, to plan how best to meet local health and care needs and influence the commissioning



of services. Camden's Joint Health and Wellbeing Strategy (2015-2018) sets out the following priorities: healthy lives; mental health and wellbeing; and continuing to strengthen the integration of health and social care. These priorities are underpinned by the Camden Joint Strategic Needs Assessment (JSNA). Consideration must be given to the actions identified in Camden's Joint Health and Wellbeing Strategy.

- 4.4 The population make up of an area such as age, gender, ethnicity, and deprivation can determine the likely health issues it may face. Camden's JSNA 2013 describes the borough's current and future health and wellbeing needs. In Camden the age and gender profile is very similar to London but younger than England with significantly greater proportions of younger adults. There are, however, an increasing number of older people in the borough (over 75) with numbers expected to rise to over 50% during the plan period which will impact upon the demand for services such as social care and end of life care.
- 4.5 Chronic illness, lower life expectancy, and unhealthy lifestyles are often linked to high levels of deprivation. There are health inequalities within Camden by location, gender, deprivation and ethnicity. Men and women from the most deprived areas have a life expectancy of 12.9 and 8.4 years less respectively than those from the least deprived areas. Camden scores significantly worse than the national average for hospital stays for alcohol related harm, drug misuse, and acute sexually transmitted infections. Camden is also significantly worse than the national average for obese children, new cases of tuberculosis, early deaths (under the age of 75) from heart disease and stroke, and road injuries/deaths. Cancer, cardiovascular disease and respiratory disease make up the largest causes of deaths amongst all age groups in Camden, apart from those under the age of 35.



## Role of planning in health and wellbeing outcomes

- 4.6 The creation of healthy environments for people of all ages across the borough will be a key consideration when the Council assesses planning applications. A healthy environment can promote and encourage healthy lifestyles and these are aided through good urban design, green open spaces and access to active travel choices such as walking and cycling. Other than the built and natural environment, there are social and cultural factors that promote good health and wellbeing – such as a variety of community groups, religious institutions, arts, culture and leisure facilities.
- 4.7 Planning can play a pivotal role in influencing key health determinants, especially towards improving long-term outcomes and addressing health inequalities. The determinants of health shown in the diagram below include:
- social and economic environment;
  - physical environment; and
  - individual characteristics and behaviours.



The Determinants of Health (1992) Dahlgren and Whitehead

(Dahlgren and Whitehead, 1992)

- 4.8 To ensure that development promotes and positively contributes to a healthy living environment, development will be expected to consider health outcomes at an early stage, prior to the submission of a planning application. For major developments this will be evidenced through the submission of a Health Impact Assessment (HIA). Major developments are regarded as developments of 10 or more homes or a floorspace of 1,000sqm or more, including student housing and non-residential development.

## Health Impact Assessments

- 4.9 The scope of a HIA will vary depending on the size of the development and its location. The HIA should identify the likely health impacts of the development and include measures to improve health outcomes and address negative effects and inequalities. HIAs for developments of 100 homes or more, including student housing, will be expected to include details of the engagement

they have undertaken with local health and community stakeholders in the community and how their input has influenced the development. Further information on HIA can be found in our supplementary planning document Camden Planning Guidance on amenity and the Mayor's Social Infrastructure supplementary planning document.

### Planning for all ages

- 4.10 Camden's high proportion of young adults, growing elderly population and outside visitors requires greater consideration of these groups in shaping places to live, work and visit. It is possible to make the health outcomes of an area better by ensuring that development helps to promote active travel choices and physical activity through for example, enhancing the feeling of safety and security, creation of permeable and attractive street frontages, and areas where people can sit down, take part in sport, or socialise. If a person's day-to-day activities are limited, housing and places which enable such activity to be easier will lead to better health outcomes.
- 4.11 It is important that developments consider the needs of occupants and users in terms of accessibility, space requirements and ease of movement. In consideration of Camden's growing older population, the Council strongly encourages the inclusion of dementia friendly design<sup>3</sup>. Design can have an impact on the ease with which people with dementia are able to navigate around or through an area by lighting (avoiding deep shadows), materials, clear signage, distinctive buildings and use of colour.
- 4.12 Child obesity is a problem in the borough and children who are overweight are more likely to remain obese into adulthood and develop long term health problems such as diabetes and cardiovascular disease. Creating places that make it easier to take part in physical activity, access to healthier food choices, and safe and accessible spaces for play, sport and recreation will help to tackle this issue.
- 4.13 Environmental issues such as poor air quality and flooding/overheating events particularly affect the most vulnerable in society, namely young children, older people and those with physical and mental health problems. Policy CC4 Air quality seeks to ensure that sensitive uses (e.g. housing and schools) are not unduly affected by new development or located in areas of existing poor air quality unless acceptable mitigation measures are included. Given the existing poor levels of air quality in the borough, we will seek innovative measures to improve local air quality. Development should also consider the impacts of overheating and flooding on human health and should be designed so that they are adaptable in accordance with policies CC2 Adapting to climate change and CC3 Water and flooding.

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<sup>3</sup> 'At a Glance: a Checklist for Developing Dementia Friendly Communities (Housing, Learning and Improvement Network, June 2012)'

## Integrated approach to health and wellbeing

4.14

Many measures set out in other parts of this Local Plan play a part in promoting health and wellbeing and addressing health inequalities and should be addressed, where appropriate:

- **Housing quality** – there are a number of factors that contribute to the quality of housing, including (but not restricted to) overcrowding, accessibility, space and layout, noise insulation, fabric energy efficiency, shading, and ventilation. The cost of housing is a significant issue for residents in Camden, where increased cost can lead to difficult decisions between heating and healthy food. Residential developments will be expected to meet affordable housing targets set out in Policy H4 Maximising the supply of affordable housing on maximising the supply of affordable homes.
- As part of the Council's Community Investment Programme (CIP) we are undertaking widespread estate regeneration and works to existing homes to ensure that tenants live in good quality accommodation that meets contemporary standards. This programme will also generate funds for the Council's 'Better Homes' initiative which refurbishes existing Council homes.
- **Access to healthcare services and other social infrastructure** – Policy C2 Community facilities recognises that community facilities such as schools, community centres, leisure facilities and health centres are a vital part of the infrastructure supporting Camden's quality of life. We will seek to ensure that community facilities and services are developed and modernised



in a way that is sustainable and retained for the benefit of communities in Camden.

- **Access to open space and nature** – the benefits of open space are seen to be particularly important for physical exercise, relaxation and stress relief, reducing pollutants, cooling the urban heat island and providing areas for local volunteer groups and food growing (Policy A2 Open space). We will protect, maintain and enhance Camden’s parks, open spaces and green corridors and seek to tackle deficiencies and meet increased demand for open space.
- **Air quality, noise and neighbourhood amenity** – Policies CC4 Air quality, A1 Managing the impact of development, and A3 Biodiversity recognise that development can have a significant effect upon the amenity, health and wellbeing of those who live, work and visit the borough. We will only grant permission for development that does not cause harm to amenity or/and would cause harm to air quality unless appropriate mitigation measures are adopted.
- **Accessibility and active travel** – active travel, such as walking and cycling, is one of the easiest and most cost effective means for people to achieve substantial health benefits. Our transport policies prioritise active travel choices and seek to improve the walking and cycling environment.
- **Crime reduction and community safety** – crime and fear of crime is a significant concern for many of Camden’s residents and businesses and can undermine people’s quality of life, health and wellbeing (Policy C5 Safety and security). We will require development to demonstrate it has incorporated design principles which contribute to community safety and security.
- **Access to work and training** – we want residents to benefit from the employment opportunities created by Camden’s economic success by linking the efforts of the Council, schools and employers to provide local people with the skills needed to gain employment. We will seek to reduce inequality through training and apprenticeship schemes and affordable space for small and medium-sized enterprises (SMEs) managed by businesses, higher education institutions and the third sector.
- **Social cohesion and lifetime neighbourhoods** – Policy D1 Design notes the significant link between improving physical and mental wellbeing by creating streets, spaces and buildings which allow for and encourage healthy lifestyles.
- **Climate change and minimising the use of resources** – there are links between poor health and wellbeing and the ability to heat a home cost effectively, or in hot weather ensure that the property does not overheat. Policies CC1 Climate change mitigation and CC2 Adapting to climate change will seek to ensure that buildings are designed to be more energy efficient and to cope with changes to our climate system such as wetter winters and hotter summers.

4.15

Health should not be seen as an isolated topic when assessing planning applications, rather it should be integrated as per the areas noted above. This approach has been adopted in this Plan where we have considered the impact of our policies upon the physical and mental health and wellbeing of those living, working and visiting the borough.

## Health facilities

- 4.16 The location and accessibility of health facilities has a direct impact on the health of the population. The Healthy Urban Development Unit (HUDU) recognises that in addition to advice on healthy living, appropriate health services, access and the quality of healthcare can prevent ill health and lead to better management of long-term conditions where these are identified early.
- 4.17 Camden has a wide range of health facilities, with four major hospitals, 36 GP practices and over 150 other facilities, such as dentists, optometrists, and pharmacists. As the population grows and ages, there will be a requirement for different models of health and social care provided closer to home, which will need to be recognised in the development and alteration of health care premises. Policy DM1 Delivery and monitoring and Appendix 1 set out the infrastructure requirements for the borough over the Plan period, including many that relate to improving health.
- 4.18 Policy C2 Community facilities specifically states that we will resist the loss of community facilities (which include health), unless a replacement facility that meets need is provided or where evidence demonstrates that the facility, or similar facility, is no longer required. We will also require contributions towards supporting existing or providing for new facilities from developments that result in additional need for community facilities, such as those for health.



## Community facilities

- 4.19 A diverse range of community facilities helps to enhance quality of life and social cohesion, improve personal health and wellbeing, instil a sense of community identity and belonging and may help reduce crime and anti-social behaviour. They can often support valuable services for the most vulnerable and least well-off in society.
- 4.20 Policy C2 sets out how the Council will ensure that there is provision of community facilities to meet the needs of a growing population and safeguard against the loss of viable community facilities. This is linked to the Camden Plan's aims of 'investing in our communities to ensure sustainable neighbourhoods' and 'creating the conditions for and harnessing the benefits of economic growth'.
- 4.21 The term "community facilities" in this section refers to a wide range of social infrastructure that provides a service to the community. This includes childcare, education, adult learning and training, healthcare, police stations, youth provision, libraries, public houses, community halls, places of worship and public toilets. These facilities form a vital part of town centres and neighbourhoods and address the local community's needs. However, it is acknowledged that some facilities offer large-scale or specialist provision, in some cases for a specific community and serve a wider catchment. Camden is home to health, education, scientific and research facilities with global reach and impact, which in many cases enjoy links with the local community, including in the provision of services.
- 4.22 For the foreseeable future, many of these community facilities are expected to experience reductions in funding, increased levels of demand and rising expectations. The long-term sustainability of facilities is a particular concern as funding continues to decline. The Council's Community Investment Programme is helping to re-invest proceeds from the disposal and redevelopment of land and buildings back into new and updated community facilities. For example, the Netley campus project has delivered a nursery, primary school and pupil referral unit, a multi-purpose hall and accommodation for the Adult and Community Learning Service.
- 4.23 Increasingly, complementary services are managed by a variety of different providers and are being brought together within the same site or building, improving accessibility, the user experience and helping to realise savings and efficiencies.
- 4.24 As technologies have developed, a far greater range of services are now capable of being delivered on-line. However, the presence of physical infrastructure will continue to be an important feature of service delivery in many cases. The Camden Infrastructure Study (2015) sets out the existing capacity and future need for social infrastructure in the borough. Its findings have informed the 'Infrastructure Schedule' in Appendix 1 to this Local Plan. Area/neighbourhood and site-specific infrastructure needs are also set out in other policies in the Local Plan, other development plan documents and by neighbourhood plans.

## Policy C2 Community facilities

The Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services.

The Council will:

- a. seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments. The Council may also fund improvements to community facilities using receipts from the Community Infrastructure Levy where this is identified on the Council's CIL funding list;
- b. expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements;
- c. ensure that facilities provide access to a service on foot and by sustainable modes of travel;
- d. facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community, except for facilities occupied by the emergency services due to their distinct operating needs;
- e. support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure;
- f. seek the inclusion of measures which address the needs of community groups and foster community integration;
- g. ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met:
  - i. a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;
  - ii. the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing;
- h. take into account listing or nomination of 'Assets of Community Value' as a material planning consideration and encourage communities to nominate Assets of Community Value.

### Meeting the need for community infrastructure

4.25

It is important that the growth in Camden's population does not place unacceptable pressure on existing community facilities and there is sufficient provision to support new developments. It is also recognised that some



community facilities serve a catchment extending outside the Borough boundary and the needs of residents in adjoining boroughs will be taken into account, where appropriate.

- 4.26 The Council will seek section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing community infrastructure and services is met. The Council began collecting the Community Infrastructure Levy (CIL) on 1 April 2015 and over the plan period, this will provide funding towards community infrastructure projects identified on the Council's CIL funding list (sometimes referred to as the 'Regulation 123 List'). The funding list sets out the infrastructure projects and types of infrastructure to which CIL funding will be applied and which, by default, section 106 planning obligations will not be sought. The funding list will be updated in light of changing priorities and the availability of funding. The Council has developed a ward member-led spending system for the local element of CIL. It is expected that a significant proportion of this income will provide funding for community infrastructure.
- 4.27 When we use Section 106 agreements, we will take into account viability as a factor in determining the types of facilities or services that are required and the timeframe in which these can be delivered. In addition, the Council recognises that the pooling of planning obligations is limited to a maximum of five section 106 agreements per infrastructure project or type of infrastructure. The Council will also not seek contributions for community infrastructure and services from small scale and self-build developments in line with the circumstances set out in the National Planning Practice Guidance. The Council will use strategies relating

to the accommodation requirements of the public and voluntary sectors when establishing need and local priorities for community infrastructure identified through consultation on neighbourhood and ward CIL spending.

- 4.28 The sustainability of the funding arrangements for new community facilities, including maintenance and management, is a serious concern. Where the Council is unable to enter into an agreement to meet the ongoing revenue costs of a facility itself, it will expect the applicant to demonstrate how the successful long-term future of the facility will be secured.
- 4.29 Providers of new community provision are encouraged to engage early in the development process with ward members and local communities, including Neighbourhood Forums where they exist. This ensures that local people can meaningfully input into a scheme's development.

### **Ensuring facilities are accessible for their users**

- 4.30 The Council will also assess the potential accessibility of a new or extended facility for its intended users. Where a facility is anticipated to generate a large number of visits, we would expect it to be provided within the Central London Area or the town centres of Camden Town, Kentish Town, Kilburn High Road, Swiss Cottage/Finchley Road and West Hampstead.
- 4.31 To help sustain community facilities and improve accessibility for our residents, we will expect opportunities to be fully assessed to co-locate different services or activities from one site or premises. The Council will also seek opportunities to improve access to facilities through agreements allowing the shared use of a facility by the wider community or increased hours of community access where this is practicable. A number of these arrangements already exist, e.g. schools allowing access to their premises out-of-hours. This provides a cost-effective and sometimes the only viable means of addressing deficiencies in provision and reduces the need to travel.

### **Managing the concentration of community uses and addressing the needs of all sections of the community**

- 4.32 There are significant numbers of health, education, scientific and research facilities in Camden. These facilities may perform a largely local role and function but there are many institutions in the borough with a national or international orientation. This is helping to deliver solutions for society's problems, for example new medical treatments and models of healthcare. These institutions contribute to the local and national economy by supporting enterprise and innovation, the generation of jobs and the procurement of goods and services. A cluster of research-based organisations is based around an area of King's Cross, Euston Road and Bloomsbury, known as the Knowledge Quarter. Their geographical proximity and concentration is a catalyst for collaborative-based working. In order for these institutions and enterprises to meet changing standards and requirements and sustain their leading edge, there is often an ongoing need to update and modernise facilities. It is important this is realised in a way which balances the impact on residential amenity, local transport infrastructure and the character of the local area.



- 4.33 The scale and intensity of use of some community facilities, such as schools, colleges and higher education facilities can lead to adverse impacts on residential amenity. This is principally related to the movement of large numbers of people at certain times of day, impacts such as noise and air pollution and the pressure on the transport system. The Council will ensure schemes satisfactorily address the impacts of changes to the balance and mix of uses in the area, including the cumulative impact of schemes with planning permission or awaiting determination. Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the 'school run'. We will refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase. Policy A1 Managing the impact of development refers to how the Council will manage the impact of traffic movements.
- 4.34 Some community facilities offer particular support and safe, welcoming environments for protected groups or communities which in turn contribute to Camden's diversity and social and economic wellbeing. The sometimes dispersed nature of minority groups means this benefit may extend far beyond Camden's administrative boundary. Under the Equality Act 2010, we are required to assess the impact of policies against the 'protected characteristics' of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, sex/gender and sexual orientation. We would expect proposals for new community facilities to take into account the particular disadvantages that can be experienced by individuals and groups with these characteristics. Paragraphs 4.35 to 4.42 provide examples of facilities which are important in meeting the needs of protected groups.





### Child care facilities

- 4.35 There is a wide range of nursery education and childcare options in Camden. These include children's centres operated by Camden Council, those run by local primary schools and nurseries operated by the independent, voluntary and private sector. Childcare provision is an important means of tackling the Borough's inequalities as a lack of childcare can prevent our residents from taking up employment opportunities or restrict parents to part-time work close to home. The Council will, therefore, encourage non-residential developments to include provision for child care facilities.

### Schools and colleges

- 4.36 As part of its statutory duty to ensure there are sufficient places within the Borough, the Council undertakes annual place planning for primary and secondary schools. This takes into account the current capacity of schools, the projected future demand for places, variations in demand across Camden, housing developments and proposed changes in other boroughs. Capacity from year-to-year can fluctuate rapidly due to factors such as parental choice and housing developments.
- 4.37 The 2014 primary school assessment identified a high need in the north-west of the Borough, which the expansion of Kingsgate school (with 2 forms of entry) is expected to help address. Provision has also recently increased through the opening of free schools. The 2014 secondary school assessment notes there is capacity for two further forms of entry at Regent High School. This is considered sufficient to meet needs to 2022/23 although further expansion will be needed over the longer-term.

### Faith facilities

- 4.38 Camden has many meeting places, churches, synagogues, community facilities and Islamic prayer centres that cater for a range of faiths and beliefs. It is expected that further provision will be required to meet the needs of faith communities during the Plan period. The main sources of demand arise from the inadequate size of Islamic prayer spaces in the borough and the growth in forms of evangelical Christianity.
- 4.39 The Council welcomes investment by faith communities to develop new space to meet or worship, subject to other policies in the Local Plan. The Council will also encourage faith communities to consider sharing facilities where one community has spare capacity and another has a need for space. Where new spaces are provided, the Council will expect applicants to submit an Equality Impact Assessment examining the balance between maintaining Camden's unique diversity and community cohesion.

### Provision for older people

- 4.40 Camden has a much lower proportion of older people aged over 65 compared to the national average for England and Wales, although one which is growing rapidly. A 'person centred approach' to social care support is helping older people to live more independently and for longer.



- 4.41 Older people generally have greater health needs than the wider population. It is important that development schemes take into account the physical, sensory and mental health barriers they experience. Modifications to the internal layout of buildings and features such as tactile surfaces, hearing loops, good signage and lighting and additional seating can provide significant benefits. Policy C6 of the Local Plan requires all buildings and places to meet the highest practicable standards of accessible and inclusive design.

#### **Public toilets**

- 4.42 The need for public toilets is more prevalent amongst certain groups such as the elderly, disabled, children and people suffering from bladder or bowel conditions. The lack of provision can deter people going out in the community, increasing the risk of social isolation and poor mental health. The Council will expect major schemes with large numbers of visitors to provide public toilets. We will also continue to encourage schemes whereby businesses allow the public to use their facilities.

#### **Safeguarding community facilities**

- 4.43 Community facilities are vulnerable to pressure from uses which attract higher land values and once they are lost cannot easily be replaced. The Council will normally seek the retention of community facilities except in defined circumstances. This includes where there is suitable replacement provision secured through the use of a planning obligation. We will assess whether the accessibility of the replacement provision satisfactorily addresses the needs of the facility's users and how this addresses relevant plans or programmes of re-

provision of public sector bodies. In exceptional cases, the Council may seek a financial contribution based on the cost of providing a replacement facility. The Council will expect that replacement facilities are sufficient in size and a high quality design which facilitates the successful operation of the community use.

- 4.44 There may also be circumstances where a community use, either wholly or in part, is no longer required or viable 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 not create, or add to, a shortfall in provision for the existing community use and if it would not, that the facility is unable to address a need for any other community use in the local area. The Council may require marketing evidence to show that the premises have been offered at a reasonable charge to community groups or voluntary organisations. We will set out further details in Camden Planning Guidance. 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.
- 4.45 Where an alternative community use cannot be found for the existing facility, the Council will seek the provision of affordable housing as its preferred alternative use. Community facilities generally have a relatively low capital value compared with housing sites. We will seek the maximum reasonable amount of affordable housing in accordance with Policy H4 Maximising the supply of affordable housing, having regard to financial viability. We will expect the proportion of affordable housing to reflect the value of the development site in its former community use.

### **Assets of Community Value**

- 4.46 The Council supports the community, including Neighbourhood Forums, wishing to nominate 'Assets of Community Value' (ACV). An ACV is a building or piece of land which currently, or in the recent past, furthers the social wellbeing or cultural, recreational or sporting interests of the local community and is expected to do so in the future. The Council will formally register the asset if it meets certain criteria. If it does, if and when the owner decides to sell the asset, a local group can trigger a six month moratorium on the sale giving them time to raise the funds to purchase it (sometimes referred to as a 'right to bid'). Owners have to consider bids, but they do not have to accept them.
- 4.47 The Council, when determining planning applications involving loss of community facilities, will treat the listing of an Asset of Community Value as an indicator of local support and evidence that it furthers the social wellbeing and interests of residents.
- 4.48 Policy C3 Cultural and leisure facilities provides more detail on how we will protect cultural and leisure facilities and Policy C4 Public houses relates to the safeguarding of pubs.



## Cultural and leisure facilities

- 4.49 Cultural and leisure facilities, such as theatres, galleries and museums; live music, comedy and dance venues; and provision for sports and exercise, contribute enormously to Camden's attractiveness as a place to live, work or study. These facilities support opportunities for people from all walks of life to meet and interact and promote a sense of belonging and connection. The variety and richness of culture and leisure facilities has an influence on community identity and mix, townscape character and the local economy.
- 4.50 Camden has a long history as a centre of creativity, attracting artists to live, study and work. This is demonstrated in the breadth of facilities in the borough, which include the British Museum, Roundhouse, Cockpit Arts, Camden People's Theatre, Akademi, The Place, Camden Arts Centre, Freud Museum and the New Diorama Theatre. Part of the West End theatre district lies in Camden and there are a number of cinemas and theatres elsewhere in the Borough catering for local/specialist audiences. Camden Town, in particular, acts as an internationally recognised centre for cultural activities, particularly the live music scene. There is also an important cluster of cultural activities and creative industries around King's Cross.
- 4.51 The ability to sustain and build on this success relies on the availability of a wide range of suitable accommodation, including small and affordable spaces, in appropriate locations. This includes retaining supporting infrastructure such as rehearsal rooms and studios. Policies E1 and E2 of the Local Plan seek to ensure there is a continuing supply of small and medium-sized employment



premises, which may be suitable for businesses in the arts and creative sector and facilitates the clustering of firms. Policy A2 Open space of the Local Plan seeks to deliver improvements to open spaces, such as outdoor gyms and multi-use games areas.

- 4.52 Some of Camden’s cultural and leisure facilities are considered to be at risk from demolition or a change of use due to the high values generated by alternative uses, particularly housing. Also, development in the vicinity of some facilities, particularly live music venues and theatres, can potentially lead to pressure from their occupants for additional restrictions on venues to be applied. This could affect their viability and may even lead to a facility closing despite of its wider community benefit. This risks diminishing the mix and richness of Camden’s culture and leisure offer. Pubs are closely linked to the vibrancy of Camden’s culture by providing space for live music, comedy and theatre and are protected through Policy C4 Public houses.
- 4.53 There are a number of sports facilities in the Borough including multi-purpose sports halls, fitness centres/gyms, swimming pools and bespoke provision for individual sports. There is a mix of private, voluntary and public sector providers and shared-use agreements are an important means of securing access for the wider community. It is desirable to protect these facilities, if viable. There is a very high level of demand on some sports facilities in the Borough linked to the large population of students and popularity of after-work sports activities. The Council will seek to ensure these demands do not harm the opportunity for the wider population to participate in physical exercise and sport or adversely affect the development of sports or athletes.
- 4.54 Some cultural facilities, such as museums and galleries, are classified as D1 under the Use Classes Order, as they are considered to provide a service to the community. They will be protected in accordance with Policy C2 Community facilities. Most other cultural and leisure uses fall under D2 of the Use Classes Order or are sui-generis (not belonging to a specific use class) for which this policy will apply.
- 4.55 This policy aims to ensure we give particular attention to the value provided by cultural and leisure facilities in planning decisions. It also seeks to address their vulnerability from higher value land uses.

## **Policy C3 Cultural and leisure facilities**

### **Protection of cultural and leisure facilities**

The Council will seek to protect cultural and leisure facilities and manage the impact of adjoining uses where this is likely to impact their continued operation.

Where there is a proposal involving the loss of a cultural or leisure facility, it must be demonstrated to the Council’s satisfaction there is no longer a demand. When assessing such planning applications, we will take the following into account:



- a. whether the premises are able to support alternative cultural and leisure uses which would make a positive contribution to the range of cultural and leisure facilities in the borough;
- b. the size, layout and design of the existing facility;
- c. proposals for re-provision elsewhere;
- d. the impact of the proposal on the range of cultural and leisure facilities; and
- e. the mix of uses in the area.

Exceptionally it may be practicable for a cultural or leisure facility to re-provided on-site through redevelopment, or elsewhere in the Borough. The Council will take the following into account when determining the suitability of proposals:

- i. the impacts of the re-provision on the existing occupier and users of the facility;
- ii. changes in the mix of uses arising from the loss of the existing cultural/leisure facility;
- iii. the loss of cultural heritage; and
- iv. the affordability of the new facility.

If a replacement facility is provided, it should be at the same or better standard than the facility which is lost and accessible to its existing users.

#### **New cultural and leisure facilities**

The Council will seek opportunities for new cultural and leisure facilities in major, mixed use developments and support the temporary use of vacant buildings for cultural and leisure activities. We will seek shared-use or extended access for the community in appropriate developments through developer agreements.

We will expect the siting of new facilities, including the expansion of existing provision, to take into account its associated impacts. Large-scale facilities should be located where as many people as possible can enjoy their benefits and make use of public transport to get there. Central London and town centres will, therefore, be the most appropriate locations.

Smaller facilities may, however, be appropriate anywhere in the Borough providing they do not have an adverse impact on the surrounding area or the local community.

#### **Retaining cultural and leisure facilities**

4.56

The Council will seek to retain cultural and leisure facilities. In assessing planning applications, we will consider the effects of the proposal on both the local area and the wider borough and whether the loss of a use would be detrimental to the range of leisure and cultural facilities, including specific cultural and leisure activities (e.g. live music), where appropriate. We will also consider whether the scheme would be detrimental to health and well-being through the loss of facilities which provide meeting spaces for the community. We will take into account any planned new facilities which may address a shortfall in provision.



4.57 Cultural and leisure facilities can contribute to townscape value and the special character and appearance of conservation areas and may be a heritage asset in their own right. The civic importance of buildings, such as theatres and music venues, is often reflected by the quality of their architectural design and internal fabric and fittings. Cultural and leisure facilities support consumer expenditure, tourism and business investment in the Borough and contribute to the vibrancy and success of town centres and the night-time economy. The following types of facility are considered to be important in helping to define Camden's cultural and leisure offer:

- small, affordable accommodation highly valued by artists and performers;
- the range of live music venues and performance spaces, including the concentration of these uses in Camden Town;
- theatres of national, metropolitan and local/community significance, including part of London's 'theatreland';
- the mix of galleries and venues supporting visual arts;
- nationally and internationally important museums, archives and collections;
- a wide range of indoor and built sports provision, including for specialist sports;
- schools which through community access agreements provide opportunities for residents to participate in physical activity and sport; and
- facilities supporting protected groups, e.g. children and young people.

4.58 The Council recognises that the users of a leisure or cultural facility will be drawn from a catchment unique to the particular venue and therefore we will consider the value a facility provides to Londoners, including protected groups (as set out in the Equality Act 2010) where relevant, as well as the local community.

4.59 Cultural and leisure facilities are seen as being under particular threat in London due to rising property values and their siting in prominent locations. There are a wide range of facilities we wish to see protected, in particular affordable accommodation as this is becoming increasingly scarce in inner London. Certain facilities are particularly valuable due to their significance in helping to define Camden's cultural and leisure offer.

4.60 The Council wants to ensure that existing cultural and leisure attractions are sustained and enhanced. It is important that noise sensitive uses, such as residential, built adjacent to an established facility, do not affect the ability for cultural and leisure premises to continue operating successfully, e.g. live music venues. Policy A4 Noise and vibration provides further advice on this matter.

#### **Additional considerations where the loss of a cultural or leisure facility is proposed**

4.61 Demand for cultural and leisure uses varies over time and as a result, there may no longer be a demand for an existing facility. Where proposals would involve the loss of a cultural or leisure facility we will expect the applicant to demonstrate to the Council's satisfaction there had been a search for alternative cultural and leisure uses for the site through a marketing exercise according to requirements which will be set out in Camden Planning Guidance. The marketing exercise should be undertaken over a period of not less than 12 months and be based on a realistic price/rent which is supported by the Council. Alternative uses should support culture and leisure strategies in Camden and London and provide benefit for the local community or protected groups. This recognises that competition from other land uses could harm the variety, richness and character of Camden and London's cultural offer. Once lost, cultural and leisure uses cannot easily be replaced as land and construction costs make it challenging to provide new facilities.

4.62 When a proposal would result in the loss of existing cultural or leisure uses, we will take into account the size, layout and design of the existing facility, the mix of uses in the area and proposals for the re-instatement of a cultural or leisure facility on-site or elsewhere. It is considered that scope for re-providing cultural and leisure facilities is constrained by factors such as cultural history, including associations (e.g. with prominent people or important periods or events) or experience, where these are intrinsic to a particular premises, as well as the benefits an attraction may enjoy from being located close to other cultural and leisure uses.

4.63 The sustainability of the funding arrangements for Council run facilities is a serious concern. There may be circumstances where a cultural or leisure facility is no longer viable. In considering proposals for replacement provision, we will take into account relevant plans and programmes to ensure services can continue to operate successfully.

#### **Enhancing culture and leisure provision**

4.64 The cultural and leisure sector will require more floorspace as Camden and London's population grows and in order to sustain its future success. The Council will seek opportunities for new accommodation in major mixed use



schemes. Cultural and leisure facilities can enhance the potential appeal and character of a development although an impact assessment may be required for the largest facilities.

- 4.65 Major new cultural and leisure facilities should be located where as many people as possible can enjoy their benefits and make use of public transport to get there. Smaller facilities may be appropriately located anywhere providing they do not adversely affect the amenity of the area or the local community. We will also encourage temporary cultural and leisure attractions which can bring life back to vacant buildings and land and can help to offset the environmental impacts of a development's construction phase.
- 4.66 The Council will also support communities in nominating cultural and leisure facilities as 'Assets of Community Value'. For further details, please see Policy C2 Community facilities.

## Public houses

- 4.67 Public houses (pubs) play an important community and cultural role. As places where members of the community meet and gather, they support social wellbeing and strengthen community cohesion. They sometimes provide important community meeting space and host local meetings, events and entertainment. Some pubs also support Camden's social diversity by providing a valuable support function for minority groups. In some areas, the community pub continues to provide the main public space for socialising with friends, making new contacts, exchanging ideas, celebrating important occasions and staging large gatherings including live music, theatre and comedy nights.
- 4.68 Many pubs contribute to local culture and identity and this is often closely related to a pub's long-standing presence in the street scene. The closure of a pub can lead to the loss of an area's vibrancy as well as its diversity and interest. Some pubs are important because they are heritage assets and architecturally distinguished.
- 4.69 Pubs also have an important economic function in contributing to the vitality of town or neighbourhood centres and providing a hub for the surrounding neighbourhood. Some of the most interesting and unique pubs attract customers from a wide catchment area and may be important in terms of their tourism value or to a protected group defined under the Equality Act 2010. Pubs support local employment and entrepreneurship, provide valuable work experience for young people and support jobs in the wider economy through the pub supply chain. They provide an important outlet for breweries in Camden and London to sell their products.
- 4.70 However, pubs across London and nationally are under immense pressure from higher value uses, especially housing development, the availability of cheap alcohol in supermarkets and increasing operating costs. In the London region between 2008-2012 around 100 pubs closed every year (net). Pubs in residential areas are considered to be especially vulnerable to demolition or a change of use due to the high residential values.
- 4.71 A related issue is the loss of part of an operating pub, such as beer gardens and ancillary residential accommodation. This can raise concerns about the impact of such changes on the pub's character and continuing ability to operate successfully. The loss of one or more elements of a pub may undermine its appeal or lead to negative impacts on the amenity of the surrounding area or conflict between incompatible uses.
- 4.72 National planning policy recognises that public houses, along with other community facilities, enhance the sustainability of local communities and should be safeguarded and retained for the benefit of the community while allowing them to develop and modernise in a sustainable way.
- 4.73 In April 2015, changes were made to the Town and Country Planning Act to give protection to pubs nominated by the local community as Assets of Community Value (ACV). These amendments remove certain 'permitted development' rights for a limited time period. This means that pubs cannot be changed to other uses, like retail, without planning permission. This restriction also applies to



pubs which have not yet been designated as an ACV but where the Council has notified the developer of the nomination. The Council welcomes nominations from the community for pubs to be listed as an Asset of Community Value<sup>4</sup>.

- 4.74 Traditional public houses fall into the same use class as other drinking establishments. This means that it is not possible for the Council to use its planning powers to resist changes from one type of drinking establishment to another, e.g. when a traditional pub is changed into a wine bar.

## Policy C4 Public houses

The Council will seek to protect public houses which are of community, heritage or townscape value.

The Council will not grant planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless it is demonstrated to the Council's satisfaction that:

- a. the proposal would not result in the loss of pubs which are valued by the community (including protected groups) unless there are equivalent premises available capable of meeting the community's needs served by the public house; or
- b. there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term;

Where a public house is converted to an alternative use, the Council will seek the retention of significant features of historic or character value.

Applications involving the loss of pub floorspace, including facilities ancillary to the operation of the public house, will be resisted where this will adversely affect the operation of the public house.

Where it has been demonstrated to the Council's satisfaction that a public house can no longer be retained, the suitability of the premises for alternative community uses for which there is a defined need in the locality should be assessed before other uses are considered. If the pub is a heritage asset, it should be conserved in a manner appropriate to its heritage significance.

The Council will support the provision of new public houses in appropriate sites in growth areas, other highly accessible locations and town centres, subject to other policies in this Plan.

### Protection of valued pubs

- 4.75 The Council will seek to protect pubs that are important to the local community. This reflects paragraph 70 of the National Planning Policy Framework (NPPF) which urges Local Planning Authorities to plan positively for the provision and

<sup>4</sup> 'Assets of Community Value' (ACV) are buildings or land which currently, or in the recent past, further the social wellbeing or cultural, recreational or sporting interests of the local community and are expected to do so in the future. If the owner decides to sell an asset listed or nominated as an ACV, a local group can trigger a 6 month moratorium on the sale giving them time to raise funds to purchase it.

use of public houses and guard against the unnecessary loss of valued facilities. Policy C4 allows flexibility by supporting development where it would not be contrary to the interests of the economy, historic environment or community. The overall aim is to ensure that the Council is able to protect all of its public houses which provide a significant benefit or value to the local community, including access to range of facilities; that public houses of historic and cultural value are conserved and enhanced according to their significance; and that the vibrancy and vitality of Camden's centres and local economies are sustained.

- 4.76 The Council will determine whether a proposal would result in the loss of a pub with community, cultural or heritage value. A 'community pub' predominantly serves a local residential community or a 'protected group' (for example the Lesbian, Gay, Bisexual and Transgender communities) which may have a catchment wider than the local area. There may exceptionally be a justification for protecting a pub which does not meet this criterion if it is the last facility capable of meeting the local community's needs and could conceivably do so in the medium term.
- 4.77 It is important that the local community have a say in whether pubs are protected. The Council may require an applicant to fund a survey to establish the views of the community, including members of protected groups where appropriate, on the loss of the public house. The methodology and content of the survey would need to be agreed in writing by the Council and be funded by the applicant. If a pub is registered as an Asset of Community Value, a survey will not be required to demonstrate to the Council the community value of a pub.
- 4.78 Where the proposed development would result in the loss of a valued pub, the Council will require evidence setting out alternative public house provision



in the local area or for the community, including information on the location, size, range and quality of facilities, taking account of any unimplemented planning permissions for the addition or loss of public houses. The availability of alternative premises will only be considered where they meet equivalent needs of the community, such as performance spaces, meeting rooms or a beer garden. The loss of a pub cannot be overcome by the availability of other public houses if it would lead to the loss of pub facilities or services of particular value to the community.

- 4.79 The Council will also require applicants to fund a marketing exercise to demonstrate whether there is a demand for the pub at a realistic rent or freehold value which is 'free of tie'. The Council will expect a mounted sales/letting board to be provided throughout the marketing period to draw the community's attention to the marketing exercise.
- 4.80 There are many instances in London of a struggling pub being turned around by new operating models and management. This includes pubs being run as community social enterprises. The Council will require applicants to demonstrate to the Council's satisfaction there is no reasonable prospect of a pub being able to trade from the existing premises in the medium term. We will require details including rents, turnover figures and other factors relevant to a pub's viability including the style of operation, hours of opening, supply of food and availability of meeting and event rooms. Applicants should set out what operating models have been used to help sustain or improve the pub's potential.
- 4.81 At the applicant's expense, the Council will require a qualified licensed leisure chartered surveyor independent of the selling agent to confirm that the rental and freehold value of the pub used in the marketing exercise is reasonable. We will also require an independent chartered surveyor to provide written confirmation that the pub has no potential in the medium term. Further details on the community survey, marketing and other evidence requirements in this policy will be set out in Camden Planning Guidance.
- 4.82 Many pubs are valued for their architectural interest, historic fabric and contribution to the character and townscape value of the local area, for example through their distinctive signage, windows or fittings. They can also support the character and attractiveness of the wider townscape by supporting a diversity of uses and vitality in the local area. Pub gardens can be particularly valued for providing communal open space in the built-up area. Where the Council agrees to the conversion of a public house, we will seek the retention of significant features which contribute to the building's character and heritage value. Some of Camden's pubs are listed buildings and are therefore afforded protection under the Planning (Listed Buildings and Conservation Areas) Act 1990. The Conservation Area Appraisals and Management Strategies may provide further guidance in conservation areas.

#### **Partial loss of a public house**

- 4.83 The partial loss of a pub and ancillary facilities may be detrimental to its character, community value or future viability. Outdoor amenity spaces, gardens, cellars and parking areas attached to pubs can also be subject to pressures for residential development. These changes can lead to a pub becoming less profitable and as a consequence, more vulnerable to further redevelopment,

potentially leading to a pub being lost altogether. In determining whether the loss of floorspace is acceptable, the Council will take into account the effect of changes to the pub's layout and reduction in its trading area on its continuing ability to operate successfully. We will also consider whether these changes would adversely impact on the pub's community, historic and townscape value. In some cases the loss of part of a pub may lead to its continuing operation being undermined by the greater likelihood of complaints relating to noise and nuisance from occupants of new non-ancillary uses. A particular problem is the potential harm to residential amenity which cannot be overcome through mitigation measures to the building's fabric, for example where the loss of a pub's garden is proposed. Camden Planning Guidance will provide advice on evidence the Council will require to justify the loss of pub facilities.

## Safety and security

- 4.84 Crime and the fear of crime can undermine people's quality of life, health and wellbeing. Planning plays an important role in reducing crime and helping to create safe and secure places. Our challenge is to make the borough a safer place for everyone, while making sure that Camden maintains the vibrancy that contributes so much to its character and success. The following policy will help us make Camden a safer place.

### Policy C5 Safety and security

The Council will aim to make Camden a safer place.

We will:

- a. work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;
- b. require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;
- c. require appropriate security and community safety measures in buildings, spaces and the transport system;
- d. promote safer streets and public areas;
- e. address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design; and
- f. promote the development of pedestrian friendly spaces.

Where a development has been identified as being potentially vulnerable to terrorism, the Council will expect counter-terrorism measures to be incorporated into the design of buildings and associated public areas to increase security.

### Camden Community Safety Partnership

- 4.85 The Camden Community Safety Partnership is a statutory body established to reduce crime, disorder and nuisance in the borough. The Partnership is a network of organisations involved in community safety including the Council, Metropolitan Police, Transport Police, the Mayor's Office for Policing and Crime (MOPAC) and the Camden Safer Neighbourhood Board. Every year the partnership sets priorities based on safeguarding of risk and harm and mitigating against the impact of crime and antisocial behaviour. Its current priorities include tackling antisocial behaviour and reducing the impact of the night time economy on local communities. Planning policies can assist with these goals.



- 4.86 The level and type of crime and antisocial behaviour varies across the borough and areas of higher crime have been identified within Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury wards. The borough's central location and thriving night time economy can be linked to a range of problems, including alcohol and drug related criminal and antisocial activity. Development in the borough provides the opportunity to implement measures to improve community safety, in particular where development takes place in areas with relatively high levels of crime and antisocial behaviour.

#### **Design and security**

- 4.87 Consideration of how crime, disorder and fear of crime can be addressed is an important element in good design. This can create safe and attractive places to live and work, reduce the opportunity for crime and allow for better maintenance and management of buildings and spaces. The Council will require all developments to incorporate appropriate design, layout and access measures to help reduce opportunities for crime, the fear of crime and to create a more safe and secure environment. Crime Impact Assessments will also be sought for major developments.
- 4.88 We strongly encourage security features to be incorporated into a scheme from the beginning of the design process and complement other key design considerations. Internal security measures are preferred. Further information on designing safer environments is set out in our supplementary planning document Camden Planning Guidance on design.
- 4.89 The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would encourage antisocial behaviour. The use of the site and layout should also be carefully considered as these can also have a major impact on community safety.

#### **Food, drink and entertainment uses**

- 4.90 Camden's food, drink and licensed entertainment premises contribute to the attractiveness and vibrancy of the borough but, where there is a concentration of late night activity, there can also be problems such as noise and disturbance, littering, antisocial behaviour, crime and violence. The cumulative impact of these uses will therefore be assessed in line with our town centre policies, particularly Policy TC4 Town centre uses and Policy A1 Managing the impact of development. The Council will also take into consideration any concerns raised from stakeholders within adjoining areas beyond Camden's boundaries.
- 4.91 Alcohol related crime and late night disorder have been identified as significant issues, particularly within Camden Town and the Seven Dials area of Central London. Camden's Statement of Licensing Policy sets out the Council's approach to licensing and special licensing policies apply to these areas.
- 4.92 We will also use management and maintenance plans with owners and operators, secured by planning condition and/or legal agreement, to make sure that the areas outside of premises are appropriately managed. Further

information regarding food, drink and entertainment uses and where these may be acceptable is set out in our supplementary planning document Camden Planning Guidance on town centres, retail and employment.

#### **Pedestrian use and natural surveillance**

- 4.93 Encouraging pedestrian use is known to deter crime by natural surveillance (i.e. limiting the opportunity for crime by increasing the likelihood of it being seen). To encourage pedestrian use, the Council aims to ensure spaces are permeable (i.e. easy to walk and cycle through). Gated community developments are therefore unlikely to be acceptable.
- 4.94 To further encourage pedestrian use, developments should also maximise the use of 'active frontages' designed to give buildings a safer, more welcoming appearance and enable overlooking of public areas. External security features which obscure the front of buildings such as solid roller shutters can make places seem hostile and unsafe which can discourage pedestrian movement, they will therefore be resisted. Further information is available regarding the design of security features is set out within Policy D1 Design, Policy D3 Shopfronts and our supplementary planning document Camden Planning Guidance on design.

#### **Counter-terrorism**

- 4.95 Camden's position in the centre of a major international city, its high profile major transport interchanges and famous buildings and places make resilience to terrorism an important issue in some areas of the borough. If necessary, the Council will therefore work with the Ministry of Defence's Strategic Planning



Team and local security advisors and take into account the most up-to-date information provided regarding potential security risks. The design of these buildings, spaces and transport facilities will be expected to include appropriate and proportionate security and community safety measures and follow design principles contained within the government publication Protecting Crowded Places: Design and Technical Issues.

## Access for all

- 4.96 Good access and inclusion benefits everyone. However, many people are disadvantaged by poor access to facilities and buildings and many vulnerable and disadvantaged groups, such as disabled people, older people and others who experience a barrier to the built environment, can be particularly affected. Poor access can also be caused by difficulties in using the specific facilities themselves.

### Policy C6 Access for all

The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.

We will:

- a. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;
- b. expect facilities to be located in the most accessible parts of the borough;
- c. expect spaces, routes and facilities between buildings to be designed to be fully accessible;
- d. encourage accessible public transport; and
- e. secure car parking for disabled people.

The Council will seek to ensure that development meets the principles of lifetime neighbourhoods.

- 4.97 Many people experience difficulties in using buildings and spaces as their access needs are ignored, or considered too late in the development process to ensure inclusive design principals are included.
- 4.98 The Council will require all buildings and spaces to be designed to be fully accessible and promote equality of opportunity. As accessibility is influenced by perceptions as well as physical factors, buildings should also be designed to appear, as well as be, accessible. We will require a Design and Access Statement for new developments and spaces to show how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.
- 4.99 The Council will balance the requirement to provide access with the interests of conservation and preservation. We will seek sensitive design solutions to achieve access for all, to and within listed buildings. Policy D2 Heritage sets out our detailed approach to development affecting listed buildings and other heritage assets.
- 4.100 Making sure that people can move through streets and places easily and safely is as important as making the buildings themselves accessible. The Council will expect improvements for all pedestrians including disabled people to ensure

good quality access and circulation arrangements, including improvements to existing routes, surfaces and footways. The Camden Streetscape Design Manual and supplementary planning document Camden Planning Guidance on design provide further guidance on this issue.

- 4.101 The Council aims to increase the attractiveness of public transport by creating networks which make people feel safe, link to all parts of the borough and enable use by everyone including disabled people. The provision of public transport allows independence in travel choices and is vital to those without access to, or without the means to use, a car.
- 4.102 While the Council encourages public transport and car-free schemes, in line with sustainable development objectives, we recognise that some disabled people rely on private motorised transport. We will therefore require relevant planning applications to demonstrate how the needs of disabled drivers have been addressed. Where appropriate, the Council will support provision of disabled parking and drop-off facilities which are integrated with public transport facilities.
- 4.103 The Council believes that new housing should allow less mobile residents to live as independently as possible. Accessible homes give them greater choice about where to live and mean people are less likely to need to move when they become less mobile. The Council's policies on accessible and adaptable dwellings and wheelchair user dwellings are set out in Policy H6 Housing choice and mix and in supplementary planning document Camden Planning Guidance on housing.

#### **Lifetime Neighbourhoods**

- 4.104 Lifetime Neighbourhoods are a government initiative to ensure that our places allow people to live fulfilling and independent lives as they grow older. Lifetime neighbourhoods is broad in scope, but the elements most relevant to planning are providing homes to meet people's needs (including lifetime homes), ensuring development promotes sustainable travel (including walking and cycling), protecting the vitality and viability of our town centres and shopping areas and protecting community facilities. Further information is available in the document Lifetime Homes (Communities and Local Government 2011).





# 5. Economy and jobs

## Economic development

- 5.1 Camden has one of the most successful economies in the country: home to 24,000 businesses and over 300,000 jobs. The success of its economy relies on the wide variety of employment sectors including professional and business services, the 'knowledge economy', for example higher education and research, and creative industries such as design, fashion and publishing. Camden also has a large number of jobs in the health sector, hotels and restaurants, legal services, and transport and distribution. We want to maintain and build on this success by encouraging investment that supports business growth creating further job opportunities for Camden residents and developing the infrastructure that will help existing businesses to thrive.
- 5.2 Camden also attracts mid- and small-scale creative organisations. These often cluster together in tailored buildings, for example Cockpit Arts and Kingsgate Workshops, or in certain parts of the borough, such as the wider King's Cross area, which contains over 300 small cultural and creative industries, and Camden Town, with its concentration of design and media firms. Camden's shops also have a significant role as local employers as well as being valuable community facilities.
- 5.3 The majority of jobs in Camden are located in the south of the borough, in Camden Town and other town centres. Thousands of people travel into the borough every day to work and take advantage of these opportunities. However, a number of local residents do not have the skills or qualifications sought by the borough's employers, particularly in 'knowledge-based' businesses. We want residents to benefit from the employment opportunities created by Camden's economic success by linking the efforts of the Council, schools and employers to provide local people with the skills needed to gain employment. We will also work with partners to reduce inequality through training and apprenticeship schemes and affordable space for small and medium-sized enterprises (SMEs) managed by businesses, higher education institutions and the third sector.
- 5.4 The policies on economy and jobs will be a key element in achieving the vision and objectives of the Camden Plan and this Local Plan by providing for the jobs and training opportunities needed to support Camden's growing population and by securing land and premises for the borough's businesses. This will contribute to achieving the Camden Plan aspiration of making Camden a better borough, where everyone has a chance to succeed and nobody gets left behind, through creating the conditions for, and harnessing the benefits of, growth.
- 5.5 Throughout this section the terms 'business' and 'employment' are used to refer to the following uses:
- offices, research and development and light industry (Use Class B1);
  - general industrial uses (Use Class B2);
  - storage and distribution (warehousing) (Use Class B8); and
  - other unclassified uses of similar nature to those above, such as depots or building merchants (classified as Sui Generis).

## Policy E1 Economic development

The Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

We will:

- a. support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;
- b. maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;
- c. support local enterprise development, employment and training schemes for Camden residents;
- d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;
- e. support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;
- f. direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;
- g. support Camden's industries by:
  - i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;
  - ii. supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;
  - iii. safeguarding the Kentish Town Industry Area;
  - iv. promoting and protecting the jewellery industry in Hatton Garden;
- h. expect the provision of high speed digital infrastructure in all employment developments; and
- i. recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.

### Providing a range of employment premises

5.6

In order to secure a strong and successful economy, the Council will support businesses of all sizes, particularly start-ups, small and medium-sized enterprises. Camden has a large proportion of small businesses, with 83% employing less than nine people and a further 14% employing between 10 and 49 employees. However, premises suitable for small businesses as well as medium sized enterprises are currently under pressure from rising land values, limited land availability and 'permitted development' rights which allow the change of use from offices (B1(a)) to housing (C3) without the need for planning permission and therefore without assessment against our planning policies.

- 5.7 The majority of Camden's office stock is in Central London, particularly in the area between the City and the West End, which is characterised by a high number of small to medium sized, multi-let buildings, with a smaller number of large, single occupier buildings. However, most of the secondary local office provision is located in Camden Town, Kentish Town and Kilburn. These locations also provide a substantial amount of workshop space, which supports the needs of digital technology, communication, media and consultancy businesses.
- 5.8 The Council has introduced 'Article 4 Directions' to remove the right to convert offices to homes without planning permission across much of the borough and secured an exemption for Camden's part of the Central Activities Zone (CAZ). Evidence shows that the demand to convert office premises to residential has been particularly high in Kentish Town, Camden Town with Primrose Hill and Kilburn where there are significant concentrations of premises suitable for start-up, small and medium-sized enterprises. This demand is linked to rising residential values which are making these types of conversions attractive development propositions. This raises a risk that the growth sectors, in particular creative industries, as well as small and medium-sized enterprises, will find it difficult to find suitable premises in which to locate and grow in Camden. Therefore, we will continue to use the measures available to us to protect such premises in the borough and ensure that new proposals do not result in a net loss of premises suitable for such uses.
- 5.9 Small businesses often seek premises that have flexible terms like shorter leases, layouts that can adapt as the business grows or changes and networking space to interact with other small business or to meet with clients. Therefore, as well as safeguarding existing employment sites, we will seek the provision of innovative new employment floorspace in developments that will provide a range of facilities including: flexible occupancy terms; flexible layouts; studios; workshops; and networking, socialising and meeting space that will meet the needs of a range of business types and sizes.

### **Digital infrastructure**

- 5.10 The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in business premises.

### **Supporting local employment training schemes and enterprise development**

- 5.11 There is often a mismatch in the skills needed by the borough's employers and the skills of some members of the community. Improving access to training will increase employment opportunities for Camden residents by giving them the skills needed to fill jobs both locally and further afield. The Council will promote the use of services like the King's Cross Recruit, Job Centre Plus and Camden Apprenticeships job brokerage service to employers and/or developers to ensure developments employ a proportion of local people.



- 5.12 To ensure that local residents benefit from employment opportunities, we will require suitable developments to provide training and employment opportunities on-site. The King's Cross Construction Training Centre will provide a key point of contact to assist developments delivering benefits to local residents.
- 5.13 Large schemes which have significant job creation potential will be expected to produce an Employment and Training Strategy to demonstrate how employment and training requirements will be addressed and supported. This will be agreed by the Council and secured via planning obligation. More information on our approach to Employment and Training Strategies is provided in the Camden Planning Guidance on town centres, retail and employment.
- 5.14 We aim to make Camden the best place to do business in London. To help us achieve this goal, we have produced the Camden Business Charter which sets out the Council's commitment to business across the following five key priority areas:
- attracting investment into Camden;
  - improving services for you as a business customer;
  - connecting your business to the local community;
  - investing in business infrastructure; and
  - supporting SMEs and social enterprises.
- 5.15 The Charter will help us to support Camden's 26,000 existing businesses and the many firms moving into the borough through major developments such as King's Cross Central. The Charter also links to our wider aim of creating the conditions for and harnessing the benefits of economic growth as outlined in the Camden Plan.





- 5.16 The Council recognises the importance of targeted private sector partnerships and their role in supporting Camden's growth. The Council will work with local business groups, major estate owners and partnerships, including the Camden Business Board to achieve the aims of the Local Plan.

### **Growth sectors**

- 5.17 Camden is experiencing significant change with substantial population growth and increases in demand for housing and employment. The latest estimates show that the total number of jobs in Camden could increase from 286,000 in 2011 to 375,000 by 2031. The Council's overall objective is to create the conditions for growth, to provide the needed homes, jobs and other facilities, while ensuring that this growth delivers opportunities and benefits for our residents and businesses.
- 5.18 There are a number of growth sectors that are particularly attracted to Camden. The Council will promote these sectors, recognising the contributions they make to the Camden economy and beyond. These are outlined below:

### **Professional and business administration**

- 5.19 The industries that account for most of the jobs in this sector include legal, accountancy and management consultant industries as well as engineering, smaller financial services and the insurance sector. Administration and business support services also account for more than 40,000 jobs and include employment placement agencies as well as jobs in building services and landscape activities, real estate and office administration support.

### **Creative industries**

- 5.20 Camden is home to a large proportion of creative and cultural businesses, particularly in the visual and performing arts, music, and video, film and photography sectors. The Creative and Cultural Industries Research Report and Action Plan 2009 found that these types of businesses create around 40,000 jobs and have an annual gross turnover of about £1 billion in Camden. The report also identifies concentrations of creative and cultural businesses across the borough, with the largest in Camden Town and smaller concentrations in and around King's Cross, Euston, Gospel Oak and Hatton Garden.
- 5.21 Camden Town has one of the largest concentrations of creative businesses in Inner London with over 500 creative workplaces and around 5,000 employees. Creative businesses are attracted to the area because of its value for money, with rents lower than in locations such as Soho and Shoreditch, and also because of Camden Town's unique character, which attracts a young and creative workforce.
- 5.22 The Council recognises the importance of creative industries, especially the contribution they make to the unique character and vitality of the borough. We have a number of initiatives to develop and support the creative economy in Camden, including funding for a range of agencies which help to promote the sector. The variety and richness of Camden's cultural and creative offer also relies on the availability of small affordable accommodation, such as studios and workshops for artists. We will continue to encourage and support the growth of this sector by promoting the provision of a range of premises via Policy E2 Employment premises and sites, particularly for businesses that require more flexible workspaces.

### **Knowledge Quarter and science growth sector**

- 5.23 Camden has a thriving knowledge economy with world-class institutions in science and creative industries. We will support the development of these industries and promote the development of the Knowledge Quarter around Euston and King's Cross. The Knowledge Quarter Partnership was established in December 2014 to recognise and develop this strength. The partnership is made up of 35 academic, cultural, research, scientific and media organisations all within a mile radius of King's Cross. Its overall vision is for a world-class knowledge hub for the 21st century, raising awareness and leveraged support for innovation, collaboration and knowledge exchange. Among the Knowledge Quarter's members are Central Saint Martins College, the University of London, UCL, the Wellcome Trust, the Royal College of Physicians, the British Library, The British Museum and Google, who will be building their new UK headquarters at King's Cross.

### **Office floorspace**

- 5.24 The high concentration of property, banking and service activities and large number of publishing and media businesses in the borough mean that a significant number of Camden's jobs are in offices. The Camden Employment Land Review 2014 forecasts that the demand for offices will increase by

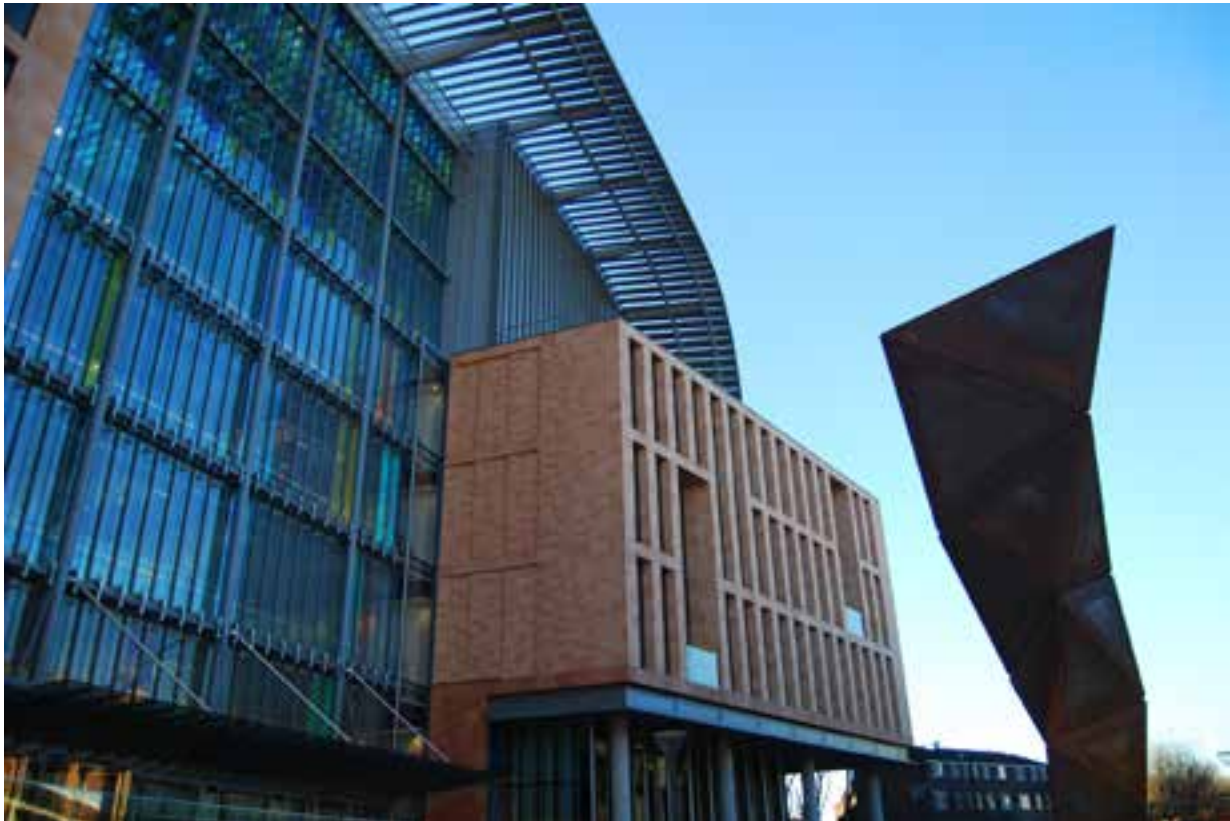


695,000sqm between 2014 and 2031. To meet this demand, the Council will direct new office development primarily to the growth areas and Central London (see also Policy G1 Delivery and location of growth).

- 5.25 The majority of demand will be met at King's Cross, through the implementation of 444,000sqm of permitted office space in King's Cross Central. There are plans for further large-scale office development in Euston, where the Council envisages in the region of 180,000 to 280,000sqm of business floorspace being provided in the second half the plan period.
- 5.26 Smaller scale office development will also occur at other sites across Central London, with some provision in Camden Town. The Council's expectations for major development sites in the borough are set out in our Site Allocations document, the Fitzrovia Area Action Plan and the Euston Area Plan.
- 5.27 The Camden Employment Land Review 2014 identifies the town centres of Swiss Cottage, Kilburn and Kentish Town as having an important role for businesses that provide local services. Although these areas are not expected to experience an increase in demand for office space, we will seek to protect existing offices in these locations subject to the criteria set out in policies E1 and E2.

### Industrial and warehousing use

- 5.28 Camden has a limited industrial and warehousing stock, which includes some modern, purpose-built premises, and a large number of older purpose-built units, railway arches, mews and converted residential spaces. These are spread across the borough with concentrations in areas such as Kentish Town, West Hampstead, Kilburn, Gospel Oak and Hatton Garden. The Camden



Employment Study 2014 found that the cost of industrial locations in Camden is high, indicating that supply does not meet demand. There has been pressure to redevelop the borough's stock of land used for employment purposes, particularly manufacturing and industry, for higher value uses, principally housing. Once an industrial or warehousing use is developed for an alternative use it is unlikely that it will be returned to such use.

- 5.29 Camden has strong trading links with London's Central Activities Zone (CAZ) and the borough's industrial and warehousing businesses provide it with a range of vital goods and support services. To make sure Camden's new and existing businesses support and benefit from the Central London economy, we need to ensure that sites and premises of adequate quality are provided.
- 5.30 Premises suitable for industrial, manufacturing and warehousing businesses provide jobs for people who would otherwise be at relatively high risk of being unemployed. The Camden Employment Study 2008 found that the skills required for these sectors are fundamentally different from other sectors with similar qualification level requirements, such as retail, leisure and hospitality. Therefore, it is unlikely that the retail or hospitality sectors will provide a straightforward alternative job opportunity for people losing industrial/warehousing jobs in the borough.
- 5.31 In response to the factors above, the Council will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use and to safeguard the identified Kentish Town Industry Area (as shown on the Policies Map). This is a large area with a mix of industrial uses and no housing, making it particularly suited for continued industrial employment use (see also paragraph 5.46) We will support proposals for intensification of employment sites where the proposals can provide additional employment benefits in terms of the number and types of jobs and training for local people alongside other Council priorities in line with Policy E2 Employment premises and sites. This approach will help to protect the supply of premises for new and expanding businesses, support the Central London economy and secure job opportunities for local people. The Council will expect training and job opportunities to be prioritised for those who would lose their jobs as a result of the proposals. Policy E2 Employment premises and sites below sets out the Council's approach to applications involving employment land in the borough.

### **Hatton Garden**

- 5.32 Hatton Garden has been an established centre for the jewellery industry since the 19th Century and today the area is home to nearly 500 businesses and over 50 shops related to the industry. In order to promote Hatton Garden as a location for jewellery related uses, the Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses through planning obligations. Please see Policy E2 Employment premises and sites for our detailed approach.



### Other employment generating uses

- 5.33 The Council recognises that jobs are provided by many types of uses within the borough, not just those based in offices or industrial premises. These include shops and markets, hotels and restaurants, leisure and tourism uses, as well as knowledge-based sectors such as health and education. For example, University College London Hospitals (UCLH) employ some 8,000 people and provide emergency and health care services locally, regionally and nationally, working and sharing staff with other Knowledge Quarter members to provide a link between research and healthcare users. Camden's visitor economy provides around 16,500 jobs in the borough, 10% of all tourism related employment in Inner London (Study of the Visitor Economy in Camden 2009) and is worth £566 million per annum. Other policies in this plan support these uses, in particular Policy C2 Community facilities, Policy E3 Tourism and policies TC1 - TC6 on town centres and shops.

## Employment premises and sites

- 5.34 Policy E2 provides further guidance on the Council's approach to maintaining and securing a range of premises for businesses to support Camden's economy and provide employment opportunities for the borough's residents. Throughout this section the terms 'business' and 'employment' are used to refer to the uses in B use class and other unclassified uses of similar nature as set out in paragraph 5.5 on page 164.

### **Policy E2 Employment premises and sites**

The Council will encourage the provision of employment premises and sites in the borough. We will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.

We will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:

- a. the site or building is no longer suitable for its existing business use; and
- b. that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.

We will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that:

- c. the level of employment floorspace is increased or at least maintained;
- d. the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;
- e. it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;
- f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
- g. the scheme would increase employment opportunities for local residents, including training and apprenticeships;
- h. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and
- i. for larger employment sites, any redevelopment is part of a comprehensive scheme.

### **Hatton Garden**

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

Where the applicant can demonstrate criterion a. and b. above we will expect the proposals to provide a mix of uses that include premises suitable for use as jewellery workshops.

We will consider redevelopment of premises or sites that are suitable for continued jewellery workshops provided that:

- j. the level of jewellery workshop space is increased or at least maintained;
- k. the redevelopment retains existing businesses on the site as far as possible; and
- l. the relocation of businesses will not cause harm to CAZ functions or Camden's local economy.

Where proposals in Hatton Garden would increase total gross internal floorspace by more than 200sqm, we will seek 50% of the additional floorspace as affordable premises suitable for the jewellery sector.

### **Business and employment uses**

- 5.35 Having a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility is vital to maintaining and developing Camden's successful economy. An increase in the number and diversity of employment opportunities is fundamental to improving the competitiveness of Camden and of London. The Council wants to encourage the development of a broad economic base in the borough to help meet the varied employment needs, skills and qualifications of Camden's workforce.
- 5.36 We will seek to ensure that existing and future employment uses can operate effectively without being in conflict with other sensitive uses such as housing. Policy A4 Noise and vibration provides further advice on this matter.

### **Proposals involving loss of business premises and sites**

- 5.37 When assessing proposals that involve the loss of a business use to a non-business use we will consider whether there is potential for that use to continue. We will take into account various factors including:
- the suitability of the location for any business use;
  - whether the premises are in a reasonable condition to allow the use to continue;
  - the range of unit sizes it provides, particularly suitability for small businesses; and
  - whether the business use is well related to nearby land uses.
- 5.38 For further details on how we will take these into account can be found in our supplementary planning document Camden Planning Guidance on employment sites and business premises.



- 5.39 In addition to the considerations above, where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. The premises should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers.

#### **Redevelopment of sites that are suitable for continued business use**

- 5.40 Where premises or sites are suitable for continued business use, the Council will consider higher intensity redevelopment schemes which improve functional efficiency, maintain or, preferably, increase the amount of employment floorspace and number of jobs and provide other priority uses, such as housing (and, in particular, affordable housing), community facilities and open space, where this would not prejudice the continued operation of businesses on the site. The loss of a business supporting the CAZ or the local economy as part of a redevelopment scheme will only be permitted if it is demonstrated that it is possible for the existing business to be relocated to a sustainable location and that this would not cause harm to CAZ functions or Camden's local economy. (Further guidance on business uses considered to support the CAZ is set out in the Mayor of London's Central Activities Zone Supplementary Planning Guidance.) Redevelopment should retain as far as possible existing businesses that desire to remain on the site, and in particular retain industrial and warehouse/logistic uses that support the functioning of the CAZ or the local

economy. The reprovided employment floorspace on the proposal site should be designed flexibly to be able to accommodate a range of business types and sizes, in particular small and medium-sized enterprises (SMEs) and businesses in growth sectors such as the creative industries. The provision of affordable workspaces will be particularly welcomed.

- 5.41 Applicants must demonstrate to the Council's satisfaction that the commercial element of any redevelopment scheme is appropriate to meet the likely needs of the end user. The provision of inappropriate business space (e.g. inappropriate floor to ceiling height or poor access arrangements) will not be acceptable as this often fails to attract an occupier, which can lead to vacancy. Clear separation of the residential element and effective management of the business space will also be important. Further information on new workspace can be found in our supplementary planning document Camden Planning Guidance on employment sites and business premises.
- 5.42 Where it is proposed to redevelop employment land for another business use, the Council will seek to retain features that will enable the flexible use of the premises for a range of business purposes. This will help to maintain the range of employment premises available and is especially important given the limited supply of non-office premises.
- 5.43 We will also seek the provision of managed workspace or premises where this can be incorporated into developments with an employment component. This will help small and growing businesses and social enterprises in Camden to find suitable and affordable premises in buildings which are managed by a third party. Some workspace providers also supply administration and business services as well as a café/bar or other social space. Developers will be expected to liaise with the Council and managed workspace providers to ensure





that appropriate accommodation is provided. Please see our supplementary planning document Camden Planning Guidance on employment sites and business premises for more information on the provision of flexible and affordable workspace.

- 5.44 Where provision of SME workspace has been agreed as part of a development, the Council will seek to secure this via the use of planning obligations. We will also seek to secure through a planning obligation an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm or more. The cost per square foot or per workstation that would be considered affordable will vary according to a range of factors such as location, type, quality etc. Where workspace has been specified as affordable, the Council's Economic Development Team will work with developers to agree appropriate terms of affordability on a case by case basis. The following are examples of ways in which affordability could be considered:
- an element of the space could be provided at less than 80% of comparable market values (however, for many sectors and locations in Camden rents will need to be lower than this to make them affordable to target occupiers);
  - a sponsorship programme through which a number of local businesses are able to access space at reduced rents for an agreed period; and
  - an average of market rents paid by tenants in the area occupying an equivalent type and quality of space.
- 5.45 The Council will also consider alternative suggestions made by developers.

### **Industry Area**

- 5.46 The Council will retain the Kentish Town Industry Area for industrial and warehousing uses as set out in Policy E1 Economic development, by resisting any proposals that would lead to the loss of sites in Use Classes B1(b), B1(c), B2 and B8 and sui generis uses of a similar nature. Part of the Industry Area is in low density employment use. The Council will consider higher intensity redevelopment proposals for employment uses for the use classes identified within this paragraph. Redevelopment proposals for the Industry Area will be assessed in accordance with Policy E2. The inclusion of other priority uses, as set out in criterion h, will not be required as part of any redevelopment scheme; however the inclusion of such uses could form part of development proposals provided that they would not prejudice the successful operation of businesses in the area.

### **Hatton Garden**

- 5.47 The designated Hatton Garden area has a special character due to its nationally and internationally important cluster of jewellery manufacture and trading. The Council seeks to preserve and enhance the special character of the Hatton Garden, and to secure and protect a stock of premises available for small jewellery workshops and related light industry.
- 5.48 We will seek to ensure that existing and future employment uses, particularly workshops, in Hatton Garden can operate effectively without being in conflict with other sensitive uses such as housing. Policy A4 Noise and vibration provides further advice on this matter.

- 5.49 In line with Policy E2, in the Hatton Garden area the conversion of employment premises will only be permitted where it can be demonstrated that they have been vacant and marketed for at least two years and they are replaced by a mixed use development that includes premises suitable for use as jewellery workshops as well as other appropriate uses.
- 5.50 The Council will expect the marketing evidence to clearly demonstrate that these premises have been marketed explicitly for the jewellery industry through appropriate media. Applicants should contact the Council's Economic Development team, who can provide information and guidance.
- 5.51 We will use planning obligations and conditions to ensure that the premises provided are suitable for jewellery uses in terms of design, layout and affordability.
- 5.52 Where redevelopment proposals would increase total gross floorspace by more than 200sqm, we will seek 50% of additional floorspace as affordable premises suitable for the jewellery sector. In such cases the Council will expect rents for the designated jewellery space to be no more than the average of market rents for B1c space in jewellery use in Hatton Garden and will seek to negotiate lower rents where possible. When the provision of workspace is not possible due to the nature of the site or the development, we will seek a financial contribution towards support for the jewellery industry. The requirement to provide workspace will be determined by the supply of such space in the area. Where considered appropriate, contributions towards training and support activities for industry in Hatton Garden may be sought in lieu of workshop provision. The level of contribution will be related to the area of workspace that would otherwise have been expected.

#### **Live/work premises**

- 5.53 It is recognised that combined live/work units can provide a valuable contribution to the range of business premises and may enable certain sites to remain in employment use. The Council will allow live/work developments where they do not result in the loss of sites that are suitable for continued business use or the loss of permanent housing.

## Tourism

- 5.54 Local Plan Policy E1 Economic development sets out the Council's overall strategy for Camden's economy. It recognises the contribution that tourism makes to the character of Camden and the way that is perceived by those living outside the borough, and also the substantial number of jobs it provides. Policy E3 sets out our detailed approach to supporting tourism and providing accommodation for those visiting the borough.

### Policy E3 Tourism

The Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation.

We will:

- a. expect new, large-scale tourism development and visitor accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn;
- b. allow smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage;
- c. consider tourism development outside of the areas listed above where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough;
- d. encourage large-scale tourism development and visitor accommodation to provide training and employ Camden residents;
- e. protect existing visitor accommodation in appropriate locations.

All tourism development and visitor accommodation must:

- f. be easily reached by public transport;
- g. provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;
- h. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and
- i. not lead to the loss of permanent residential accommodation.

### Tourism in Camden

- 5.55 Camden has a wide variety of tourist and cultural attractions, from major institutions, such as the British Museum and British Library; to open spaces like Hampstead Heath and Primrose Hill; shopping destinations like Camden Town's markets and Covent Garden; venues such as the Roundhouse, Koko and the Forum; Regent's Canal; and historic places, such as Hampstead and Bloomsbury. These attract high numbers of visitors throughout the year from London, the UK and beyond and contribute greatly to the vibrancy, image and economy of Camden and London as a whole.



- 5.56 Camden also has the second largest number (17,580) of serviced rooms in London, after Westminster (GLA Working Paper 58, Understanding the demand for and supply of visitor accommodation in London to 2036, August 2013). Visitor numbers to London are expected to continue to increase, creating demand for more hotels and other overnight accommodation, particularly in Central London. The London Plan sets a target of achieving 40,000 net additional hotel rooms by 2036 across London. The Working Paper also states that 37% of the expected increase in the number of rooms across Greater London will be met in Westminster, City of London and Camden. This policy aims to maintain and encourage a range of attractions and accommodation in the borough for Camden's visitors.
- 5.57 Visitor accommodation includes hotels, bed and breakfast premises, youth hostels, backpacker accommodation, aparthotels, serviced apartments and most other short-stay accommodation that is intended for occupation for periods of less than 90 days. Please see Policy H8 Housing for older people, homeless people and vulnerable people for more information on short stay accommodation for homeless people and other vulnerable people.

#### **Location of tourism developments**

- 5.58 The Council will guide tourism development that is likely to attract large numbers of people to Camden's part of Central London, particularly the growth areas of King's Cross, Euston, Holborn and Tottenham Court Road. The Council will generally consider large-scale developments to be those that provide additional floorspace of 1,000sqm or more. For tourism developments in Fitzrovia please refer to the Fitzrovia Area Action Plan. Tourist attractions may also be

acceptable in other parts of the borough if they have a local focus and a limited number of expected visitors. Examples of this type of attraction are the Freud Museum, near Finchley Road, and Keats' House in Hampstead.

- 5.59 We will protect existing visitor accommodation in appropriate locations. Central London, our growth areas and the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage are considered to be appropriate locations. Other locations may also be appropriate where they are highly accessible by public transport and do not harm amenity, the environment or transport systems.

### **Access**

- 5.60 Visitor attractions and accommodation can generate significant vehicle movements, particularly by taxi, private hire cars and coach. New tourism developments should therefore be easily reached by public transport and should include set down and pick-up points for any private hire cars and coach visits they are likely to attract. The Council will require the provision of both taxi ranks and coach parking where necessary. Taxi ranks and coach parking are often most appropriately located on street, rather than off the highway. Please refer to London Plan Policy 6.13, which sets minimum requirements for coach parking. The Council will also protect existing coach facilities and taxi ranks in line with London Plan Policy 6.2 and the Mayor's Land for Industry and Transport SPG, in particular SPG16 and SPG17. Where it is not possible to provide for a suitable set down point for coaches, the Council may negotiate planning obligations with developers to prevent coach access to these sites. Please see our supplementary planning document Camden Planning Guidance on transport for further information.

### **Training and employment**

- 5.61 Large-scale tourism attractions and visitor accommodation employ a large number of people. New developments will be encouraged to provide training and employ Camden residents in line with Policy E1 Economic development.





# 6. Protecting amenity

## Managing the impact of development

- 6.1 Standards of amenity (the features of a place that contribute to its attractiveness and comfort) are major factors in the health and quality of life of the borough's residents, workers and visitors and fundamental to Camden's attractiveness and success. Camden's Inner London location, the close proximity of various uses and the presence of major roads and railways means that amenity is a particularly important issue within the borough.
- 6.2 Policy A1 therefore seeks to ensure that standards of amenity are protected. Other policies within the Plan also contribute towards protecting amenity by setting out our approach to specific issues, such as the impact of food, drink and entertainment uses in Policy TC4 Town centre uses, Policy A4 Noise and vibration, and Policy CC4 Air quality.

### **Policy A1 Managing the impact of development**

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.

We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- d. require mitigation measures where necessary.

The factors we will consider include:

- e. visual privacy, outlook;
- f. sunlight, daylight and overshadowing;
- g. artificial lighting levels;
- h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
- i. impacts of the construction phase, including the use of Construction Management Plans;
- j. noise and vibration levels;
- k. odour, fumes and dust;
- l. microclimate;
- m. contaminated land; and
- n. impact upon water and wastewater infrastructure.

### **Protecting amenity**

- 6.3 Protecting amenity is a key part of successfully managing Camden's growth and ensuring its benefits are properly harnessed. The Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.

### **Visual privacy and outlook**

- 6.4 A development's impact upon visual privacy, outlook and disturbance from artificial light can be influenced by its design and layout. These issues can affect the amenity of existing and future occupiers. The Council will expect that these elements are considered at the design stage of a scheme to prevent potential harmful effects of the development on occupiers and neighbours. Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.

### **Sunlight, daylight and overshadowing**

- 6.5 Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011). Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.

### **Artificial lighting levels**

- 6.6 Camden's dense character means that light pollution can be a bigger problem in the borough than in lower density areas where uses are not so close together. Artificial lighting should only illuminate the intended area and not affect or impact on the amenity of neighbours.
- 6.7 Developments in sensitive areas, such as those adjacent to sites of nature conservation, should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife. For further information please see our supplementary planning document Camden Planning Guidance on amenity.

### **Transport impacts**

- 6.8 The Council will consider information received within Transport Assessments, Travel Plans and Delivery and Servicing Management Plans to assess the transport impacts of development. Guidance regarding these documents is available within our supplementary planning document Camden Planning Guidance on transport. In instances where existing or committed capacity cannot meet the additional need generated by the development, we will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts.

- 6.9 Proposals should make appropriate connections to highways and street spaces, in accordance with Camden's road hierarchy, Transport for London's Street Type Framework and to public transport networks. Any development or works affecting the highway will also be expected to avoid disruption to the highway network, particularly emergency vehicle routes and avoid creating a shortfall to existing on-street parking conditions or amendments to Controlled Parking Zones. To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever possible. Major developments dependent upon large goods vehicle deliveries will also be resisted in predominantly residential areas. Further details regarding the movement of goods and materials is available within Policy T4 Sustainable movement of goods and materials.
- 6.10 Highway safety, with a focus on vulnerable road users should also be considered, including provision of adequate sightlines for vehicles leaving the site. Development should also address the needs of vulnerable or disabled road users.
- 6.11 Highway works connected to development proposals will be undertaken by the Council at the developer's expense. This ensures that highway works, maintenance and materials adopted by the Council are constructed to an appropriate standard. This includes highway works that form part of a planning approval appropriate for adoption, including design and implementation of new routes to be adopted, owned and managed by the relevant Highway Authority. Development requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces. Separate arrangements will apply for any works on roads managed by Transport for London.

### **Construction Management Plans**

- 6.12 Disturbance from development can occur during the construction phase. Measures required to reduce the impact of demolition, excavation and construction works must be outlined in a Construction Management Plan.
- 6.13 Construction Management Plans may be sought for:
- major developments;
  - basement developments;
  - developments involving listed buildings or adjacent to listed buildings;
  - developments that could affect wildlife;
  - developments with poor or limited access on site;
  - developments that are accessed via narrow residential streets;
  - developments in areas with a high number of existing active construction sites; and;
  - developments that could cause significant disturbance due to their location or the anticipated length of the demolition, excavation or construction period.
- 6.14 We will require Construction Management Plans to identify the potential impacts of the construction phase and state how any potential negative impacts will be mitigated.
- 6.15 Whether a Construction Management Plan is required for a particular scheme will be assessed on a case by case basis. Construction Management Plans will





usually be sought for major developments, however there are many instances where smaller schemes can have very significant impacts, particularly within predominantly residential areas.

- 6.16 A Construction Management Plan will usually be secured via planning obligations between the developer and the Council after an application is approved. We will expect developers to sign up to the Considerate Constructors Scheme and follow guidance within Camden's Considerate Contractors Manual. Financial contributions and monitoring fees may also be sought if necessary.
- 6.17 The level of detail contained within a Construction Management Plan should be proportionate to the scale and/or complexity of the development. To assist developers in providing the right information, the Council has created a Construction Management Plan Pro-forma which is tailored towards the specific needs of the borough. The criterion in the Pro-forma are drawn from relevant aspects of Transport for London's (TfL) Construction Logistics Plans and follows TfL's construction safety best practice guidelines. Construction Logistics and Cyclist Safety scheme (CLOCS) standards and Camden's Minimum Requirements for Building Construction also form the basis for the Pro-forma criterion. The Pro-forma is available on the Council's website.
- 6.18 The Council seeks to minimise the movement of goods and materials by road through the use of consolidation facilities and rail and water freight where possible. Please see Policy T4 Sustainable movement of goods and materials on the movement of goods and materials for further detail. For further details regarding Construction Management Plans please refer to our supplementary planning documents Camden Planning Guidance on amenity and Camden Planning Guidance on planning obligations.

### Noise and vibration

- 6.19 Noise and vibration can have a major effect on amenity. The World Health Organisation (WHO) for example states that excessive noise can seriously harm human health, disturb sleep and have cardiovascular and behavioural effects. Camden's high density and mixed-use nature means that disturbance from noise and vibration is a particularly important issue in the borough.
- 6.20 Where uses sensitive to noise are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application. Further detail can be found in Policy A4 Noise and vibration and our supplementary planning document Camden Planning Guidance on amenity.

### Odours, fumes and dust

- 6.21 Odours, fumes and dust can be generated from commercial cooking, industrial process and construction and demolition which have the potential to cause a range of health problems, including respiratory diseases.
- 6.22 We will require all development likely to generate nuisance odours to install appropriate extraction equipment and other mitigation measures. These should be incorporated within the building where possible. External extraction equipment and ducting should be sited sensitively, particularly on listed buildings and within conservation areas. Further details can be found in our supplementary planning documents Camden Planning Guidance on design and Camden Planning Guidance on amenity.
- 6.23 The Council will limit the disturbance from dust due to construction and demolition by expecting developers and their contractors to follow the Greater London Authority and London Councils' Best Practice Guidance: The control of dust and emissions from construction and demolition. Details of how these measures will be implemented should be provided in a Construction Management Plan. Further information regarding the management of dust can be found within Policy CC4 Air quality.

### Microclimate

- 6.24 Large developments can alter the local climate. Buildings can affect the flow of air and cause wind tunnels which can potentially affect the enjoyment of public spaces. A building's colour can affect how much heat it absorbs and therefore impact upon local air temperatures. Developments should therefore consider local topography and the local microclimate in their design. Developments large enough to alter the local climate will be required to submit a statement demonstrating how the design has considered local conditions. Further detail can be found in our supplementary planning documents Camden Planning Guidance on sustainability and Camden Planning Guidance on amenity.

### Contaminated Land

- 6.25 Development on contaminated land can expose people to a wide range of potential health risks. Examples of sites that may have contaminated land include those that have been used for vehicle repair, industrial processes and petrol stations. The Council will expect proposals for the redevelopment of sites



that are known to be contaminated, have the potential to be contaminated, or are located in close proximity to such sites to submit relevant assessments and take appropriate remedial action to the Council's satisfaction if required. Remedial action is particularly important in developments where people will have access to the ground for gardening, play or planting food for consumption. Please refer to our Contaminated Land team and our supplementary planning document Camden Planning Guidance on amenity for further information.

### **Water and wastewater infrastructure**

6.26

The Council will work with water providers to ensure that there is adequate water and wastewater infrastructure serving developments likely to put pressure on existing water infrastructure. Developers may be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to reductions in water pressure, sewer flooding or overloading of existing water and wastewater infrastructure. Where there is a infrastructure capacity constraint and no improvements are programmed by the water provider, we will use planning conditions and/or obligations requiring developers to provide secure mitigation and compensatory measures which must be completed prior to occupation of the development. Further information regarding flood risk, drainage and water supply can be found within Policy CC3 Water and flooding and further detail regarding obligations can be found within our supplementary planning document Camden Planning Guidance on planning obligations.

## Provision and enhancement of open space

- 6.27 Camden benefits from a wide range of open spaces including parks, natural or semi-natural green spaces, housing estate amenity areas, playgrounds, historic cemeteries, churchyards, allotments, community gardens, outdoor sports facilities and the Regent's Canal. Hampstead Heath is the largest open space in the Borough, providing nearly half of the total area of open space and a range of outdoor sports facilities. There are over 280 designated public and private spaces shown on the Local Plan Policies Map.
- 6.28 Camden has large areas of Metropolitan Open Land (MOL) which is important to the whole of London, as well as the Borough, and provides attractive, visual breaks to the built-up area, keeping land permanently open. This designation is broadly equivalent to the Green Belt, meaning development is only permitted in very special circumstances. The Regent's Canal forms part of the Blue Ribbon Network of waterspaces and is of strategic significance to London. It contributes to open space provision by providing amenity, opportunities for recreation and support for biodiversity. The London Plan sets out in detail how development affecting the MOL and Blue Ribbon Network will be assessed.
- 6.29 The Borough has a variety of locally significant open spaces performing a range of functions. About two-thirds of all spaces are small parks, linear green space/ green corridors or amenity land used and highly valued by local residents. A significant number of open spaces are designated for their nature conservation importance and Policy A3 Biodiversity relates to the safeguarding of these sites. The Borough's open spaces, together with street trees, soft landscaping, roof gardens, green/brown roofs and walls and the Regent's Canal, form a network of 'green infrastructure' performing a range of functions and delivering a wealth of benefits for the local population and wildlife.
- 6.30 The Mayor of London has published the 'All London Green Grid' Supplementary Planning Guidance (SPG) to support the implementation of the Green Infrastructure policies of the London Plan. A series of Area Frameworks expand on this by setting out objectives and strategic opportunities in eleven sub-areas – (part of) the Lee Valley and Finchley Ridge and Central London Frameworks provide detail relating to opportunities and projects in Camden. The SPG identifies two strategically important landscape corridors partly in Camden: the Regent's Canal Link and the Nash Ramblas Link: a continuous route connecting Parliament and the Thames with Parliament Hill and Hampstead Heath.
- 6.31 Open space is critical to sustainability and wellbeing. It performs a social role by providing a variety of areas in which to relax, socialize, enjoy sport and take part in physical exercise. This is especially important at a time when the Council is seeking to address the prevalence of obesity and weight issues and their link with conditions leading to premature death. Quiet areas of green space can enhance personal wellbeing and play space is an important tool in supporting the development of children and young people. Businesses are more likely to invest in areas which offer attractive green spaces. The upgrading of open spaces and the public realm is often a key driver of regeneration and renewal



plans, restoring confidence and pride in an area. Open space and greenery can limit the risks to human health and the economy from extreme weather events and environmental threats through cooling the air, the absorption of pollutants and attenuating run-off. This will become even more important if climate change results in more extreme weather events.

## Policy A2 Open space

The Council will protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure.

### Protection of open spaces

In order to protect the Council's open spaces, we will:

- a. protect all designated public and private open spaces as shown on the Policies Map and in the accompanying schedule unless equivalent or better provision of open space in terms of quality and quantity is provided within the local catchment area;
- b. safeguard open space on housing estates while allowing flexibility for the re-configuration of land uses. When assessing development proposals we will take the following into account:
  - i. the effect of the proposed scheme on the size, siting and form of existing open space and the functions it performs;
  - ii. whether the open space is replaced by equivalent or better provision in terms of quantity and quality; and
  - iii. whether the public value of retaining the open space is outweighed by the benefits of the development for existing estate residents and the wider community, such as improvements to the quality and access of the open space.
- c. resist development which would be detrimental to the setting of designated open spaces;
- d. exceptionally, and where it meets a demonstrable need, support small-scale development which is associated with the use of the land as open space and contributes to its use and enjoyment by the public;
- e. protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;
- f. conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets;
- g. give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);
- h. promote and encourage greater community participation in the management of open space and support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;
- i. consider development for alternative sports and recreation provision, where the needs outweigh the loss and where this is supported by an up-to-date needs assessment;



- j. preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath; and
- k. work with partners to preserve and enhance the Regent's Canal, including its setting, and balance the differing demands on the Canal and its towpath.

#### **New and enhanced open space**

To secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough's network of open spaces, the Council will:

- l. seek developer contributions for open space enhancements using Section 106 agreements and the Community Infrastructure Levy (CIL). The Council will secure planning obligations to address the additional impact of proposed schemes on public open space taking into account the scale of the proposal, the number of future occupants and the land uses involved;
- m. apply a standard of 9 sqm per occupant for residential schemes and 0.74 sqm for commercial and higher education developments while taking into account any funding for open spaces through the Community Infrastructure Levy;
- n. give priority to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision;
- o. ensure developments seek opportunities for providing private amenity space;
- p. give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space;
- q. seek opportunities to enhance links between open spaces recognising the multiple benefits this may bring;
- r. tackle deficiencies to open space through enhancement measures; and
- s. seek temporary provision of open space where opportunities arise.

### **Protection of public and private open spaces and land on housing estates**

6.32

It is important that we protect the public and private open spaces designated on the Local Plan Policies Map, as well as areas of land on housing estates with the potential to be used as public open space. They are a limited resource and highly valued by the community. There will be increased pressure on this space from the anticipated growth in Camden's population. Camden's open space designations include outdoor sports provision, including playing fields and ancillary facilities, which the Council will seek to protect, maintain and enhance. The Council's Open Space, Sport and Recreation Study (2014) provides further information relating to the attributes of individual open spaces. The loss of an

open space will only be acceptable where provision of equivalent or better space is made within an appropriate catchment area for the type of open space. Catchment distances are set out in Camden Planning Guidance on amenity.

- 6.33 Camden has many large housing estates with extensive areas of amenity land. This has generally not been formally designated as open space but constitutes a potential resource for providing enhanced public or communal open space. The Council wishes to protect this land, while allowing for the reconfiguration of open space and other land uses across estates where significant public benefits have been demonstrated (for example provision of new homes, schools and other community benefits), in particular for residents of the estate. The Council will consider whether such schemes provide equivalent or better provision in terms of the quality and quantity of usable open space and secure improvements to the accessibility and range of uses. This can bring enhancements where land set within housing estates is of poor quality, badly arranged or offers limited value in terms of open space functions for which it can be used.
- 6.34 The success and viability of open spaces is closely linked to the scale, character and quality of the adjacent townscape and development. We will resist proposals which would affect the use and enjoyment of an open space through detrimental changes to its setting. This includes changes to the space's appearance or character, effects on the microclimate, levels of external light or noise pollution and overshadowing, overlooking or disruption to views in or out of the space.
- 6.35 When assessing proposals that would involve the loss of open space, it must be demonstrated to the Council's satisfaction there is an exceptional need for the development and it is associated with the use of the land as open space.



Any development should be the minimum necessary to address the identified need. We will resist proposals which would be detrimental to the amenity and character of the space or reduce the public's use and enjoyment of the open space and its setting. The Council will seek replacement provision elsewhere to compensate for the loss.

- 6.36 Extensions and alterations to existing buildings on open space should be proportionate to the size, including the volume, of the original building. Proposals seeking the change of use of an existing building should also be sensitive to the role and function performed by the open space. The poor quality of an open space will generally not be accepted as a reason for its partial development to fund improvements as, once built on, the open space is lost to the community for ever.

### **Protection of other undeveloped areas including gardens**

- 6.37 Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area. The Council will protect such spaces in accordance with paragraph 74 of the National Planning Policy Framework. Gardens help shape their local area, provide a setting for buildings, provide visual interest and may support natural habitats. Therefore they can be an important element in the character and identity of an area (its 'sense of place'). We will resist development that occupies an excessive part of the garden, and the loss of garden space which contributes to the character of the townscape. Part of the established character of these spaces may also be defined through features such as railings and garden walls. We will seek the retention of these features where they make a positive contribution to townscape value.
- 6.38 We will seek the retention of important views and glimpses of green space where these have been identified in a conservation area appraisal or development brief, particularly where schemes are unable to meet the requirement to provide public open space on-site, to enhance the amenity of residents and occupants. Spaces above rooflines, gaps between buildings and even small, sometimes isolated pockets of amenity space, can be vital in supporting the notion of openness, provide visual interest, soften the built environment and contribute to wellbeing. These views may also help to define the significance of heritage assets.

### **Open space designations**

- 6.39 Many of the Borough's designated open spaces are located within Conservation Areas or designated as heritage assets in their own right. This includes 'London Squares' protected for their leisure and recreational value and non-designated heritage assets identified on the Council's 'Local List' or through neighbourhood plans. A number of spaces are Parks and Gardens of Special Historic Interest – significant designed landscapes registered by Historic England. Open spaces can positively contribute to a conservation area's character and the setting of heritage assets. We will have regard to conservation area appraisals and management plans, the National Heritage List for England, the Greater London Historic Environment Record (HER) and other appropriate sources when establishing the contribution made by open spaces to the historic environment.

- 6.40 Camden's designated open spaces include areas of MOL. This is open space of London-wide significance that provides a break in the built up area and receives the same presumption against development as green belt land. There are four main areas of Metropolitan Open Land in Camden, which are of great importance to the borough and its character – Hampstead Heath and adjoining areas, Regent's Park, Primrose Hill/Barrow Hill Reservoir and Highgate Cemetery/Waterlow Park/Fairseat. We will protect the openness and character of these spaces in accordance with London Plan policy 7.17 and policy guidance in the National Planning Policy Framework (NPPF) on Green Belts.
- 6.41 The NPPF introduced the concept of a Local Green Spaces designation. This is green space where development is ruled out other than in very special circumstances. A Local Green Space should be within reasonably close proximity to the community it serves, be demonstrably special to a local community and hold particular local significance, be local in character and not form an extensive tract of land. The Council is supporting Neighbourhood Forums in identifying these spaces through neighbourhood plans.
- 6.42 The Council recognises that the need for sports and recreation provision can change over time. The Council will consider proposals for alternative provision of such uses where a need has been demonstrated to its satisfaction and this need outweighs the loss of the existing provision. The proposal will also be assessed taking into account its impact on the integrity of the open space and against other relevant policies.

#### **Key open spaces in Camden**

- 6.43 Hampstead Heath is the largest open space in the Borough providing nearly half of our total area of open space and many of our outdoor sporting facilities. The Council will work with partners, including the City of London (who own and manage the Heath), to ensure it is properly safeguarded. There are numerous large private gardens adjacent to the Heath that are designated as open space. We will continue using guidance in conservation area appraisals and management strategies to preserve and enhance the built environment around the Heath and preserve outlooks and views from it. This includes protected views from Kenwood House and Parliament Hill to St. Paul's and from Parliament Hill to the Palace of Westminster.
- 6.44 The Regent's Canal is Camden's only significant open watercourse and winds through the borough from Regent's Park to King's Cross. It is an important historical feature and development near the Canal will be expected to reflect its unique character. We will take into account the Regent's Canal Conservation Area Appraisal and Management Strategy when assessing applications for sites along and adjacent to the Canal. Other issues relevant to development proposals include increasing demands on the towpath by pedestrians and cyclists, the potential for crime and anti-social behaviour due to the canal's relative isolation and importance of retaining dark, unlit land in sustaining habitats and species, particularly the foraging of bats. The Canal is designated as a site of metropolitan importance for nature conservation and there is considerable scope to improve biodiversity along the Canal through planting, the provision of green or brown roofs and green walls.





### **New and enhanced open space**

- 6.45 The growth of Camden's population will lead to increased use and pressure on our open spaces and therefore the Local Plan seeks to secure sufficient open space with the capacity to meet the additional demand arising from new development (including a change of use).
- 6.46 The Council will seek Section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing open spaces is met. In some cases the Community Infrastructure Levy will be used to provide funding for open space improvements identified by the Council on the CIL funding list. Where the Council negotiates a planning obligation, we will apply the standards set out in criterion I. Planning obligations will not be sought for open space projects which are included in the CIL funding list. In addition, the Council recognises that the pooling of planning obligations is limited to a maximum of five section 106 agreements per infrastructure project or type of infrastructure. The Council will also not seek contributions for open space from small scale and self-build developments in line with the circumstances set out in the National Planning Practice Guidance.
- 6.47 The Council will seek on-site provision of open space wherever possible, particularly in areas we have identified to be deficient in open space. Where it is demonstrated to the Council's satisfaction that on-site provision is not possible, the Council will seek other forms of open space contribution, giving preference to off-site provision which is capable of meeting the needs generated by the development. This includes securing public access to existing open spaces; potential sites include land around housing estates and large private spaces.



### Securing high quality new open space

- 6.48 Where new open space is provided, it should take into account the characteristics of the site and the local context. This includes existing street patterns and pedestrian routes. The open space should be easy to use by people of all ages and consider the particular barriers that can be experienced by people with physical and sensory disabilities and must be safe and secure for everyone. An important consideration will be the long-term ability for a space, including landscaping, planting, street furniture and surfaces, to be managed effectively and with demands minimised on natural resources, where relevant.
- 6.49 Private amenity space is also important in adding to residents' quality of life and applicants are therefore encouraged to explore all options for the provision of new private outdoor space. Gardens, balconies and roof terraces are greatly valued and can be especially important for families. However, the densely built-up nature of the borough means that the provision of private amenity space can be challenging, and the Council will require that the residential amenity of neighbours is preserved. In densely developed areas, we will consider use of a financial contribution to create usable spaces within the public realm, for example through the widening of pavements, as this can be an effective means of achieving a range of environmental and quality of life benefits. These measures may also contribute to the implementation of conservation area management plans, e.g. the installation of sympathetic lighting or restoration of pavement materials.
- 6.50 Where a development generates a need, the Council will give priority to securing suitable provision of playspace for children and young people and an appropriate level of amenity space for the occupiers of a development. Camden Planning Guidance on amenity provides further detail on how financial contributions for open space provision will be calculated for individual schemes. It also sets out our requirements in relation to the maintenance of open spaces.

### Enhancing our green infrastructure

- 6.51 The term 'green infrastructure' refers to the network of green and open spaces, green features such as trees and green roofs and water bodies, such as the Regent's Canal, which taken together provide multiple quality of life benefits. There is a particular opportunity to continue improving links between open spaces to improve access for recreation and corridors which allow species to move between habitats. Schemes should contribute to the implementation of green infrastructure strategies (e.g. All London Green Grid) and wider strategies seeking to enhance green infrastructure, such as the Thames River Basin Management Plan.

### Tackling open space deficiencies

- 6.52 The Camden Open Space, Sports and Recreation Study (2014) shows the continuing presence of a number of 'deficiency areas' in the Borough where the local population is farther than 280m (or a 5 minute walk) from a designated public open space. The mapped deficiency areas are shown on Map 2: Locations deficient in access to open space on page 199. There are particularly large areas of deficiency in the west of the Borough and Gospel Oak. The Council's Community Investment Programme is helping to address



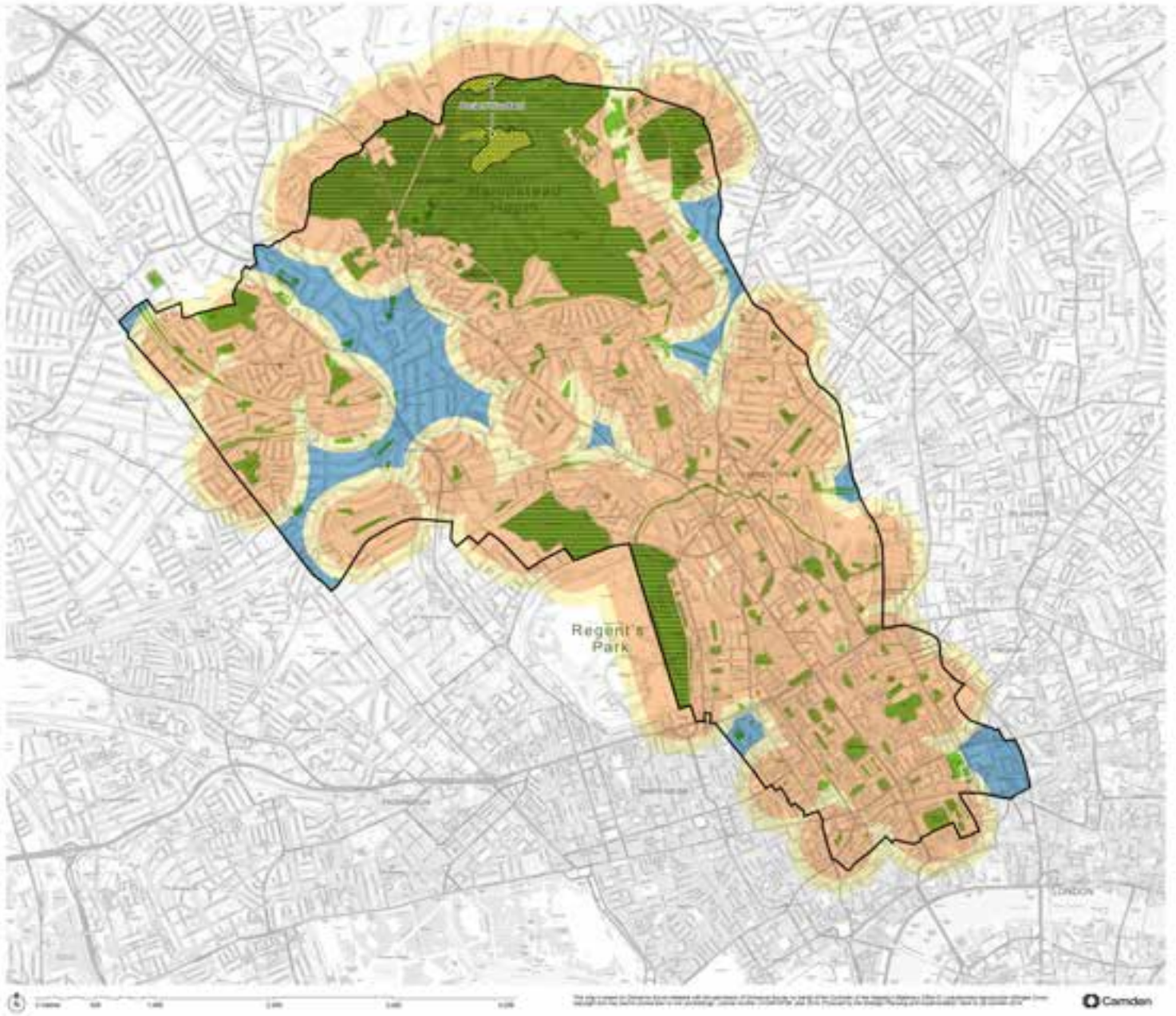
this through improving access to high quality open spaces. There are also deficiencies in the south of the Borough where it will be very difficult to create new areas of formal open space although there will still be opportunities for green and brown walls, roof gardens or public realm improvements.

- 6.53 The Open Space Study maps the areas that do not meet standards for different types of open space (parks, children's play areas, allotments and outdoor sports pitches). The Study advises that deficiency areas should be applied flexibly because they do not take into account local demographics and population density. Nevertheless, the Council considers the deficiency areas to represent a reasonable starting point for identifying where future on-site provision should be prioritised. The Open Space Study sets out a range of measures across seven sub-areas which could potentially address the issues relating to the supply of open space.
- 6.54 Camden's Site Allocations document has identified areas and development sites where there may be opportunities for incorporating new public open space. The Fitzrovia Area Action Plan and Euston Area Plan also identify how access to open space can be improved in association with development in these areas.

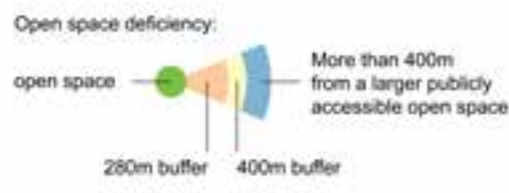
#### **Temporary provision of open space**

- 6.55 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 provide a potential location for local food growing projects.

Map 2: Locations deficient in access to open space



- Open Space
- Metropolitan Open Land
- Site of Special Scientific Interest (SSSI)
- Borough boundary





## Protection, enhancement and management of biodiversity

- 6.56 Nature provides us with a variety of environmental, social, cultural, education, health and recreation benefits. For example, trees and plants improve air quality, absorb carbon dioxide and help to regulate city temperatures; vegetated areas reduce surface water run-off and flooding risk; and insects such as bees provide pollination.
- 6.57 Biodiverse green spaces provide opportunities for inspiration and contemplation, boosting mental wellbeing. Local Nature Reserves and other natural sites provide a focus for conservation activities, support physical activity and contribute to community spirit and social inclusion. These sites also provide a rare opportunity for young people living in the urban area to learn about the natural environment. Biodiversity can provide colour and contrast to the built environment and may be important to an area's character and amenity.
- 6.58 Camden's Open Space, Sport and Recreation Study identifies there are 186 spaces with a least 5% natural greenspace cover in the Borough. Amenity grassland is the most prevalent habitat to be found across Camden. It has limited biodiversity value but does offer scope for improvement. Woodland is the second most prevalent habitat and supports a range of wildlife but is mainly in the north of the borough, meaning it is not accessible to all residents. There are also smaller areas of UK Priority habitat (i.e. of national importance) including acid grassland, heathland, ponds and reedbeds. Sites have a range of wildlife designations which reflect their national, regional and local importance. Around three quarters of all provision in the borough is found within four large sites of metropolitan importance (Hampstead Heath, Highgate Cemetery, Regent's Park and Regent's Canal).
- 6.59 Policy A3 is intended to support the London Biodiversity Strategy and the Camden Biodiversity Action Plan (BAP) by ensuring Camden's growth is accompanied by a significant enhancement in the borough's biodiversity. The Council aims to maximise opportunities for biodiversity in and around developments in order to deliver a net gain in biodiversity and a range of wider environmental benefits.

### Policy A3 Biodiversity

The Council will protect and enhance sites of nature conservation and biodiversity. We will:

- a. designate and protect nature conservation sites and safeguard protected and priority habitats and species;
- b. grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;
- c. seek the protection of other features with nature conservation value, including gardens, wherever possible;

- d. assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;
- e. secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;
- f. seek to improve opportunities to experience nature, in particular where such opportunities are lacking;
- g. require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species;
- h. secure management plans, where appropriate, to ensure that nature conservation objectives are met; and
- i. work with The Royal Parks, The City of London Corporation, the London Wildlife Trust, friends of park groups and local nature conservation groups to protect and improve open spaces and nature conservation in Camden.

#### **Trees and vegetation**

The Council will protect, and seek to secure additional, trees and vegetation. We will:

- j. resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;
- k. require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout;
- l. expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development;
- m. expect developments to incorporate additional trees and vegetation wherever possible.

#### **Protection of designated nature conservation sites and safeguarding of habitats and species**

6.60

Designated sites of nature conservation interest are shown on the Local Plan Policies Map. Taken together, these sites occupy some 414 ha of land. They are as follows:

- Hampstead Heath Woods Site of Special Scientific Interest (SSSI), which is Camden's only SSSI. SSSIs are designated by Natural England due to their nationally important habitats and species and/or geological features and must be given the highest protection in accordance with legislation.
- 36 Sites of Importance for Nature Conservation (SINC) which are graded into four categories according to spatial significance and quality. As part of the evidence base for the Local Plan, LB Camden commissioned the London

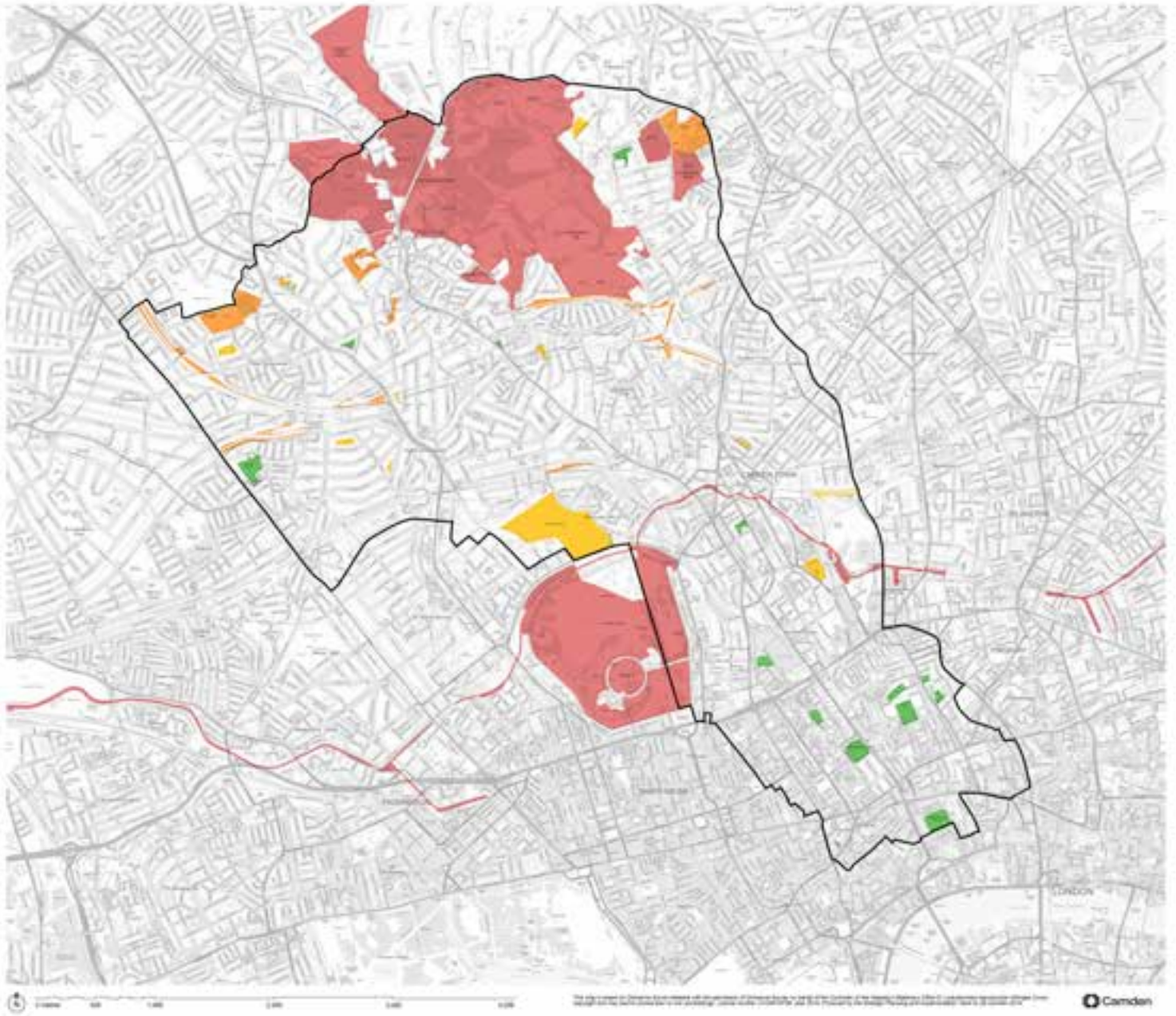


Wildlife Trust to undertake a review of these sites. This resulted in a number of boundary changes and the identification of 3 new SINCs which are reflected on the Policies Map.

- 4 nationally designated Local Nature Reserves (LNR) which host a rich variety of flora and fauna and provide opportunities for local communities to access and engage with nature – Adelaide, Belsize Woods, Westbere Copse (all managed by LB Camden) and Camley Street Natural Park (managed by London Wildlife Trust).

- 6.61 The Council will protect designated nature conservation sites from inappropriate and harmful development, proportionate to the weight afforded by these designations. In a highly built-up area, relatively small sites can be highly valued by providing access to nature. Most of the SINCs are not in the Council's control and therefore it is difficult for the Council to protect species, habitats and foraging areas other than those formally protected by international and national legislation. To protect existing sites, the Council will resist the development of designated sites where the nature conservation value has been diminished or lost, especially where this loss is due to neglect and damage as it is possible for the habitat to be restored.
- 6.62 Camden's green spaces and built environment support species protected under UK and international legislation. The presence of protected habitats or species is a material planning consideration. Protected species in Camden include significant populations of bats and rare species of birds and amphibians. Species and habitats of principal importance to the conservation of biodiversity or 'priority species', are identified in the BAP. The Council will give specific consideration to habitats and species on this list when assessing planning applications. The current BAP (2013-2018) contains targets and actions to protect and enhance habitats and species and increase opportunities to engage with nature.
- 6.63 The Council will also seek the retention of other areas with nature conservation value, such as gardens. Development will be resisted where it would result in the loss of an excessive part of the garden or garden space which contributes to the character of the townscape. Native hedgerows and vegetation comprised of native species should be retained as far as possible. However, we also recognise that existing non-native plants may also make a significant contribution to biodiversity.
- 6.64 We will expect applicants to appropriately address the indirect impacts a development could potentially have on a designated nature conservation site, (such as noise, light, shading, inappropriate planting and increased human presence). Applicants should give consideration to the need for species to move between habitats. Proposals should therefore seek to connect with existing green corridors where it is appropriate to do so.

Map 3: Sites of Importance for Nature Conservation



- Site of Importance for Nature Conservation (SINC)       Borough boundary
-  Metropolitan
  -  Borough 1
  -  Borough 2
  -  Local





### Ecological surveys

- 6.65 Our supplementary planning document Camden Planning Guidance on sustainability sets out when the Council will require ecological surveys, the level and scope of detail required and the times in which they should be carried out. These surveys are used to identify important habitat features. It is expected that an ecology scoping survey will be required on all major sites unless the Council has specifically agreed it is not.

### Enhancing nature conservation value

- 6.66 On larger schemes where development is considered to place a significant additional demand on natural greenspace, the Council will seek the provision of new natural greenspace within the site. Our Camden Planning Guidance on amenity sets out the size of scheme this relates to and how much greenspace will be sought based on the occupancy of the development. The layout and type of new habitats should take into account the site's role in buffering and connecting nature sites and wildlife corridors. Habitats and wildlife features should be integrated throughout the site, rather than being isolated pockets of nature.
- 6.67 Where on-site provision is not possible, the impact should be mitigated through works to create, reinstate or enhance habitats nearby. Enhancements will be secured through the use of planning conditions and where appropriate, planning obligations. Strategic projects will potentially be funded through the Community Infrastructure Levy (CIL).
- 6.68 In many developments, it should be feasible to incorporate biodiversity enhancing measures. These can deliver a wide range of environmental and social benefits. This includes retrofits of existing buildings, subject to impacts

on heritage assets and amenity. Potential responses including biodiverse-rich landscaping, sustainable urban drainage systems, 'species features' such as bird and bat boxes, artificial roosts for bats, tree planting and green roofs and walls. The Council will negotiate the provision of biodiverse living roofs in all suitable developments. Front gardens also provide an opportunity to provide soft landscaping (planting) which can improve biodiversity as well as enhancing the character and attractiveness of the area.

- 6.69 Developers and landowners should also give consideration to the need for species to move between different types of habitats. The Council will seek opportunities to secure green corridors as part of developments and through public realm improvements. Areas that could provide these corridors include land adjacent to railway lines and the Regent's Canal, where existing vegetation can be enhanced or new vegetation provided, and sites adjoining existing open spaces.
- 6.70 All enhancement measures, including the provision of natural greenspace, should contribute to the delivery of the BAP and green infrastructure strategies. As highlighted in Policy A2 Open space, the Mayor of London is supporting the development of a multi-functional network of accessible spaces and natural features (the All-London Green Grid).

#### **Increasing opportunities to experience nature**

- 6.71 A key objective of the BAP is to increase engagement with nature. There are typically lower levels of active engagement in more deprived areas of the borough. This is partly related to the limited spatial extent of natural habitat in these locations, where nature conservation sites are generally quite small, with parts of the west, east and south of the borough having the lowest coverage. In some cases, access to nature conservation sites is restricted in order to safeguard their nature conservation interest. The Council will need to give particular priority to addressing deficiencies in the areas shown in Map 2: Locations deficient in access to open space on page 199.
- 6.72 Of particular social benefit to the borough are Local Nature Reserves. They support a variety of learning and community based activity and it is important to protect and maximise their value. By raising awareness of our links, and dependence on the environment, these sites can foster an interest in the stewardship of natural habitats.

#### **Use of management plans to protect and sustain habitats**

- 6.73 The demolition and construction process can pose a significant risk to habitats and species, including green corridors. The Council may request a construction management plan for developments adjoining or within sites of high nature conservation value in order to protect biodiversity.
- 6.74 Once a development has been completed, management and monitoring of habitats may be required. Management plans are used to ensure areas with nature conservation value are retained and reach their full potential. Monitoring can confirm that relevant environmental measures have been implemented successfully. Maintenance and monitoring may be secured through a planning condition or legal agreement.

### Trees and vegetation

- 6.75 Trees and vegetation are integral to the amenity and character of the street scene, provide connections and habitat for wildlife, offer shade and cooling to improve the local microclimate, reduce the impacts of flooding and filter pollutants from the air. There is a strong representation of native species in Camden reflecting local soil types including trees first planted to support the substantial growth of Camden's built form in the 18th and 19th centuries. Increasing trees and vegetation is an important way of adapting to projected/ future temperature increases linked to climate change.
- 6.76 The Council will seek the retention of trees and vegetation of significant amenity, historic, cultural or ecological value. This includes trees within the public highway which can potentially be affected by a development. Trees and vegetation are important to the contribution a site and its setting make to townscape character and amenity and have a sense of maturity which may often be lacking from replacement planting. Ancient woodland and ancient or veteran trees found outside ancient woodland are particularly valuable as once lost they can never be replaced. The ancient woodland in Camden forms part of the Hampstead Woods Site of Special Scientific Interest (SSSI).
- 6.77 Applicants will be required to take measures to the Council's satisfaction to minimise any adverse impacts from development on retained and proposed trees and vegetation. This includes the potential risk of damage arising from demolition or construction works and development which fails to allow sufficient space above and below ground to prevent damage to root systems or facilitate future growth.
- 6.78 Camden Planning Guidance on design supplementary planning document sets out the information required by the Council to ensure that there is a systematic approach to the safeguarding of trees and vegetation within the development site and on adjacent land (including street trees) both during and following the construction process. We will expect developers to follow the principles and practice set out in 'British Standard 5837:2012 (or as subsequently updated) Trees in relation to design, demolition and construction - Recommendations'.

### Tree Preservation Orders

- 6.79 Tree Preservation Orders (TPOs) are used by the Council to legally protect specific trees or groups of trees that provide public amenity. Cutting, lopping or removing any part of a tree subject to a TPO other than the removal of deadwood requires the Council's consent. Where a planning application relates to trees in conservation areas, the Council will pay special attention to the desirability of preserving or enhancing the character of that area. Where a tree in a conservation area is already protected by a TPO, we will apply the normal procedures and controls associated with a TPO. In other cases, a notification procedure exists (Section 211) unless an exception applies allowing the opportunity to consider whether to make a TPO on the tree. The felling of protected trees will only be permitted in exceptional circumstances and in accordance with relevant legislation, policy and guidance.



**Replacement and additional planting**

- 6.80 Where the loss of trees or vegetation of value cannot be avoided or would adversely affect their future growth, the Council will require suitable replacements capable of providing at least equal amenity and ecological value. Where this cannot be achieved on-site, the Council will require a financial contribution towards re-provision. Tree planting should, as a minimum, offset the capacity of trees lost as a result of the development to absorb carbon, taking account of the time needed to reach maturity.
- 6.81 The Council will also expect developments to incorporate additional trees and vegetation wherever possible as part of the package of biodiversity enhancing measures described above. This should include large species trees where opportunities allow. It is particularly important that new trees and vegetation are provided on sites where this is currently lacking or where this would enhance public areas.
- 6.82 We will take a 'right tree for the right site' approach which takes account of:
- the amenity value of any trees to be removed,
  - ecology,
  - historic context,
  - availability of space,
  - soil conditions including hydrogeology,
  - potential improvements to air and soil quality,
  - reducing the effects of and adapting to climate change; and
  - the guidance provided in BS 8545 Trees: from nursery to independence in the landscape – Recommendations'.
- 6.83 The ability to sustain an attractive treed environment will often be contingent on age and species diversification.

## Noise and vibration

- 6.84 This policy seeks to ensure that noise and vibration is appropriately considered at the design stage and that noise sensitive uses are not negatively impacted by noise and vibration or that existing uses (such as music venues, theatres and some employment uses) are not unduly restricted through the introduction of nearby noise sensitive uses.
- 6.85 Noise and vibration can have a major effect on health and amenity and quality of life. Camden's high density and mixed use nature means that disturbance from noise and vibration is a particularly important issue for health and wellbeing in the borough. The Council may seek to explore the identification and designation of Quiet Areas, which are local green spaces identified for their particular tranquility and amenity value.

### Policy A4 Noise and vibration

The Council will seek to ensure that noise and vibration is controlled and managed.

Development should have regard to Camden's Noise and Vibration Thresholds (Appendix 3). We will not grant planning permission for:

- a. development likely to generate unacceptable noise and vibration impacts; or
- b. development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

We will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity.

We will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

### Sources and the character of noise in Camden

- 6.86 The main sources of noise and vibration in Camden are; road traffic, railways, industrial uses, plant and mechanical equipment, food, drink and entertainment uses, and building sites. The top six sources of noise that receive the most complaints in Camden are; music, construction noise, general people noise (e.g. footsteps, gathering), parties, fixed machinery and burglar alarms.
- 6.87 There is a proliferation of fixed machinery, such as air conditioning units in Camden's centres which cumulatively can have a harmful impact. The borough is also home to a large number and variety of food, drink and entertainment uses, often close to where people live, and as a result, conflicts can arise (see Policy TC4 Town centre uses). Such sources of noise and the character of noise can increase stress levels and cause significant disturbance. Other sources of noise such as those associated with construction are considered in Policy A1

Managing the impact of development, whereby measures required to attenuate impacts are secured by legal agreement through a Construction Management Plan.

- 6.88 The aim within development proposals should be to design out noise prior to proposing mitigation. The effect of noise and vibration can be minimised by separating uses sensitive to noise and vibration from sources that generate them and by taking other design and operational measures to reduce any impact.

### **Assessing the impact of noise and vibration**

- 6.89 Where uses sensitive to noise and vibration are proposed close to an existing source of noise or when development is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application. In assessing applications, we will have regard to noise and vibration thresholds, set out in Appendix 3, and other relevant national and regional policy and guidance and British Standards. Further guidance on the application of these standards will be provided in supplementary planning document Camden Planning Guidance on amenity.
- 6.90 Noise sensitive development includes housing, schools and hospitals as well as offices, workshops and open spaces. The impacts on external amenity spaces such as gardens and balconies will also be considered. Our supplementary planning document provides further information on how to minimise the impact of noise of developments; ways to mitigate noise emitted from developments and further detail on how the Council will assess the impact of noise and vibration.
- 6.91 Noise generating uses and fixed machinery will likely have a greater impact on amenity when the background noise level is lower or in areas where noise sensitive uses such as residential developments co-exist with other uses. The Council will take into consideration the general character of the noise (whether noise is intermittent, has a distinct screech, bang, hiss) and where appropriate, the cumulative impacts of noise from one or more noise sources and will assess whether tighter noise restrictions, secured by planning condition, should be imposed.
- 6.92 Planning permission will not normally be granted for development sensitive to noise in locations that have unacceptable levels of noise and vibration. The Council will only grant planning permission for development sensitive to noise and vibration, in locations that experience high levels of noise and for development likely to generate noise impacts, if appropriate attenuation measures can be taken. Such attenuation measures should be included on plans. Planning permission will not be granted in instances where there will be a significant adverse impact on external amenity areas including gardens, balconies and open spaces unless they can be appropriately mitigated.
- 6.93 In cases where noise sensitive development is proposed in close proximity to an existing noise generating use (such as music venues and pubs) the Council will determine whether the introduction of the sensitive use will be harmful to the



existing premises continued operation. In some cases the Council may require the developer to be responsible for future costs of soundproofing (known as the “agent of change” principle), secured by a legal agreement.

- 6.94 The Council will also consider the impact of attenuation measures on the character and appearance of the building and locality (see Policy D1 Design and associated supplementary planning document Camden Planning Guidance on design). Measures to mitigate the impacts of noise and vibration associated with demolition and construction will be secured by legal agreement through Construction Management Plans (Policy A1 Managing the impact of development).

### **Acoustic reports**

- 6.95 Where uses sensitive to noise and vibration are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application. Supplementary planning document Camden Planning Guidance on amenity provides further detail of the key information expected to be reported in acoustic reports.
- 6.96 Camden noise thresholds (see Appendix 3) reflect observed effect levels outlined in National Planning Practice Guidance and will be explained further in the Camden Planning Guidance on amenity supplementary planning document. The thresholds set noise levels for:
- noise sensitive development in areas of existing noise; and
  - noise generating development in areas sensitive to noise.

## Internal noise levels and vibration

- 6.97 Planning permission will not be granted where it is not possible to achieve suitable and sufficient internal noise levels with reference to the most up to date and appropriate guidance. This will be of particular relevance to new residential developments in areas of existing noise but will also include other noise sensitive uses. Conditions may be imposed to require that suitable internal noise levels are achieved and where appropriate, post installation testing to demonstrate that the standards have been met.
- 6.98 The most common sources of vibration that a development is likely to be exposed to are railways and industrial or commercial sites. Where a development sensitive to vibration is proposed in an area that vibration is anticipated to be present, an appropriate vibration survey should be carried out. Where vibration levels exceed those set out in Appendix 3 the proposal should demonstrate that vibration can be mitigated to acceptable levels.

## Plant and other noise generating equipment

- 6.99 Planning conditions will be imposed to require that plant and equipment which may be a source of noise is kept working efficiently and within the required noise limits and time restrictions. Air conditioning will only be permitted where it is demonstrated that there is a clear need for it after other measures have been considered (Policy CC2 Adapting to climate change). Conditions may also be imposed to ensure that attenuation measures are kept in place and are effective throughout the life of the development.
- 6.100 Emergency equipment such as generators which are only to be used for short periods of time will be required to meet the noise criteria of no more than 10dB above the background level (L90 15 minutes). During standby periods, emergency equipment will be required to meet the usual criteria for plant and machinery. Conditions to this effect may be imposed in instances where emergency equipment forms part of the application.
- 6.101 Security alarms cause significant disruption to local amenity and wellbeing. Whilst security alarms would generally not require planning permission, we would strongly encourage developers and householders to install silent alarms or alarms with a maximum of a 20 minute cut out.

## Food, drink, entertainment and leisure noise

- 6.102 Assessments for noise and vibration from entertainment and leisure premises must include consideration of amplified and unamplified music, human voices, footfall and vehicle movements and general activity. The impact of noise and vibration from food, drink and entertainment uses is outlined in Policy TC4 Town centre uses. Generally, these uses and noise from leisure uses alter the noise environment through audio devices, amplified and unamplified music, footfall, congregations of people, plant and equipment, deliveries and transport and can be particularly evident when the background noise level is quieter.
- 6.103 Where such uses are considered acceptable planning conditions restricting opening hours will be imposed to ensure that they do not adversely impact nearby noise sensitive uses.



## Delivery management

- 6.104 Deliveries, collections and the loading and unloading of goods and refuse can be a source of disruption and cause noise nuisance to nearby residential properties, particularly when undertaken at night. Therefore, to manage potential noise issues from deliveries, conditions will usually be applied to require deliveries, collections and the loading and unloading of goods and refuse take place between the hours of 08:00 to 20:00.
- 6.105 Developments requiring deliveries outside of these times will be required to provide an acoustic report to demonstrate there will be no adverse impact on the acoustic environment with particular reference to residential occupiers as a result of these activities. This could be inserted within the wider Delivery and Servicing Management Plan of the site. Regard should also be taken to the Noise Abatement Society's silent approach quiet time delivery scheme and TfL 'Retimed Deliveries' to mitigate the negative effects of possible out of hours deliveries.
- 6.106 Please see Policy T4 Sustainable movement of goods and materials and Policy A1 Managing the impact of development.

## Basements

- 6.107 With a shortage of development land and high land values in the borough, the development of basements is a popular way of gaining additional space in homes. Basements are also often included in developments in the Central London part of Camden and used for various purposes including commercial, retail and leisure uses, servicing and storage.
- 6.108 Basement development and other development that involves excavation changes the ground and water conditions of the area which can potentially lead to ground instability or flooding. Basement development can also have significant construction impacts due to the need to remove spoil and the general complexities of excavation. The Council recognises the need to protect the environment and adjoining neighbours properties and buildings from these impacts.
- 6.109 When this policy refers to basement development this includes basements, lightwells and other underground development.
- 6.110 A basement is a floor of a building which is partly or entirely below ground level. A ground or lower ground floor with a floor level partly below the ground level (for example on a steeply sloping site) will therefore generally be considered basement development.
- 6.111 When this policy refers to gardens and garden space this includes all outdoor (unbuilt) space on the property, including paved areas, driveways, as well as grassed or landscaped areas.
- 6.112 The following policies in this Local Plan are also relevant to basement development and will be taken into account when assessing basement schemes:
- Policy A2 Open space;
  - Policy A3 Biodiversity;
  - Policy D1 Design;
  - Policy D2 Heritage; and
  - Policy CC3 Water and flooding.

## Policy A5 Basements

The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a. neighbouring properties;
- b. the structural, ground, or water conditions of the area;
- c. the character and amenity of the area;
- d. the architectural character of the building; and
- e. the significance of heritage assets.

In determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- f. not comprise of more than one storey;
- g. not be built under an existing basement;
- h. not exceed 50% of each garden within the property;
- i. be less than 1.5 times the footprint of the host building in area;
- j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- k. not extend into or underneath the garden further than 50% of the depth of the garden;
- l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- m. avoid the loss of garden space or trees of townscape or amenity value.

Exceptions to f. to k. above may be made on large comprehensively planned sites.

The Council will require applicants to demonstrate that proposals for basements:

- n. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
- o. avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- p. avoid cumulative impacts;
- q. do not harm the amenity of neighbours;
- r. provide satisfactory landscaping, including adequate soil depth;
- s. do not harm the appearance or setting of the property or the established character of the surrounding area;
- t. protect important archaeological remains; and
- u. do not prejudice the ability of the garden to support trees where they are part of the character of the area.

The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

We will generally require a Construction Management Plan for basement developments.

Given the complex nature of basement development, the Council encourages developers to offer security for expenses for basement development to adjoining neighbours.

## Basement development

- 6.113 Although basement developments can help to make efficient use of the borough's limited land it is important that this is done in a way that does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment.

## Basement impact assessment

- 6.114 The Council will require evidence of the impact of basement schemes in the form of a Basement Impact Assessment to be carried out by appropriately qualified professionals. Basement Impact Assessments are to include geotechnical, structural engineering, and hydrological investigations and modelling to ensure that basement developments do not harm the built and natural environment or local amenity. Basement Impact Assessments must be prepared according to the specifications set out in our supplementary planning document Camden Planning Guidance on basements and the Camden Geological, Hydrogeological and Geological Study (ARUP 2010).
- 6.115 The level of information required will be commensurate with the scale and location of the scheme. All schemes will be expected to provide evidence against each of the considerations in Policy A5 Basements. Schemes will also be expected to submit information which relates to any specific concerns for that particular scheme or location (e.g. any history of flooding at the site or in the vicinity of the site, the presence of underground watercourses, proximity to water bodies such as the ponds on Hampstead Heath, structural instability of the development or of neighbouring properties, or unstable land). Basement Impact Assessments must use the Burland Scale in estimating effects on neighbouring properties, in accordance with the details set out in our supplementary planning document Camden Planning Guidance on basements.
- 6.116 Information submitted with basement applications must be contained within a Basement Impact Assessment which is specific to individual sites and particular proposals. Where hydrological and structural reports are required, they should be carried out by independent professionals (e.g. Chartered Structural Engineers) according to the qualifications set out in Camden Planning Guidance on basements.



- 6.117 In order to provide the Council with greater certainty over the potential impacts of proposed basement development, we will generally expect an independent verification of Basement Impact Assessments funded by the applicant. The circumstances where verification is required include:
- where a scheme requires applicants to proceed beyond the screening stage of Basement Impact Assessment;
  - where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow;
  - where there is conflicting evidence; or
  - for any other basement applications where the Council feels that independent verification would be appropriate.
- 6.118 Basement Impact Assessments must contain a non-technical summary of the evidence that applicants have gathered against each stage of the assessment. This should be presented in a format which can be fully understood by those with no specialist technical knowledge in these matters.
- 6.119 Details of the requirements and process of Basement Impact Assessments are set out in our supplementary planning document Camden Planning Guidance on basements. Applicants may also contact the Council about the level of information that should be provided for a particular scheme.

### **Burland Scale**

- 6.120 Where a BIA identifies risk of damage to properties by subsidence this risk should be described using the Burland Scale. The Burland Scale methodology has been adopted for projects internationally and has been used by the Building Research Establishment and the Institution of Structural Engineers, London. The classification system of the scale is based on the ease of repair of



visible damage. Subsidence is only one element in the many potential impacts assessed in a BIA and other methods will be employed when describing these other impacts.

- 6.121 In the Burland Scale the damage to properties caused by subsidence may be considered in three broad categories:
- (i) visual appearance or aesthetics;
  - (ii) serviceability and function; and
  - (iii) stability.
- 6.122 Burland Scale categories 0, 1, and 2 refer to (i) aesthetic damage, category 3 and 4 relate to (ii) serviceability and function, and 5 represents damage which relates to stability.
- 6.123 Burland states that it is a major objective of design and construction to maintain a level of risk to buildings no higher than category 2, where there is only risk of aesthetic damage to buildings (see Burland, J. “The assessment of the risk of damage to buildings due to tunnelling and excavations”, Imperial College London, 1995). However the Council considers that neighbouring residential properties are particularly sensitive to damage, where relatively minor internal damage to a person’s home can incur cost and considerable inconvenience to repair and redecorate. Applicants must therefore demonstrate in the Basement Impact Assessment that the basement scheme has a risk of damage to neighbouring properties no higher than Burland Scale 1 ‘very slight’.

### **Cumulative impact**

- 6.124 The cumulative effect of several underground developments in close proximity can be more significant than the impact of a single basement. The impacts include changes to ground water flow, land stability, surface water flow and flooding. Basement Impact Assessments must consider the potential wider impacts of basement schemes and the potential cumulative impact of other basement schemes in the area. Basement Impact Assessments must identify all relevant basements in the neighbouring area, including their extent and ground conditions and make an assessment of the combined effect of underground development with all nearby basements considered together. The assessment must include existing and planned development including schemes with planning permission and those to be developed under permitted development with a Certificate of Lawful Development.

### **Demolition and construction**

- 6.125 The demolition and construction phases of a development can have an impact on amenity and this is a particular issue for basements. Many basement schemes are constructed in residential areas in close proximity to people’s homes, with the construction works often involving significant disturbance (including removing significant quantities of spoil) extending for many months. Construction impacts (including noise) are also controlled by other legislation, in particular the Control of Pollution Act, with traffic impacts considered under relevant highways legislation.
- 6.126 The Council will seek to minimise the disruption caused by basement development and will generally require Construction Management Plans to

be submitted with applications. Construction Management Plans can be used to establish a community working group involving neighbouring residents to discuss, advise and make recommendations, before and during the construction period. Construction Management Plans should be based on the Construction Management Plan Proforma which is available for download from the Council's website. Please see Camden Planning Guidance on basements for further information.

## Basement Construction Plan

- 6.127 To ensure that basement construction is undertaken without causing damage to neighbouring properties and the water environment the Council may require the developer to provide a Basement Construction Plan in some circumstances. Basement Construction Plans may be required when a Basement Impact Assessment shows acceptable estimated effects but a particular construction methodology needs to be applied to ensure there is no damage to neighbouring properties. If a Basement Construction Plan is required this will be identified in the independent assessment of the Basement Impact Assessment. Basement Construction Plans will be secured by planning obligation.
- 6.128 A Basement Construction Plan sets out detailed information relating to the design and construction of the basement with a view to minimising the impacts of the development on neighbouring properties and the water environment and provides a programme of measures to be undertaken by the owner with the objective of maintaining the structural stability of the property and neighbouring properties. The developer must also ensure that throughout the construction phase a suitably qualified engineer from a recognised relevant professional body is engaged to monitor, inspect and approve the construction works. The detailed requirements of a Basement Construction Plan are set out in Camden Planning Guidance on basements.

## Size of basements

- 6.129 In addition to protecting against flooding, ground instability and damage to neighbouring buildings as set out above, the Council will also seek to control the overall size of basement development to protect the character and amenity of the area, the quality of gardens and vegetation and to minimise the impacts of construction on neighbouring properties. Larger excavations cause greater construction impacts and can have greater risks and complexity in construction.
- 6.130 A basement development that does not extend beyond the footprint of the original building and is no deeper than one full storey below ground level is often the most appropriate way to extend a building below ground.
- 6.131 Criterion f. above states that basements should not comprise more than 1 storey. The Council considers a single storey for a basement to be approximately 3 to 4 metres in height. Where appropriate we will allow a proportion of the basement to be deeper to allow development of swimming pools.
- 6.132 Criterion h. above states that basements should not exceed 50% of each garden within the property. This criterion applies to the front garden, the rear garden and gardens to the side of the property individually, rather than calculated as an

aggregated garden area for the whole property. This criterion applies to gardens as they currently exist and not the gardens of the proposed development. The unaffected garden must be in a single area and where relevant should form a continuous area with other neighbouring gardens. Sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees.

- 6.133 Exceptions to criterion f. to k. above may apply on large comprehensively planned sites. For the purposes of this policy, large comprehensively planned sites are:
- new major developments, for example schemes which comprise 1000sq m additional non-residential floorspace or 10 or more additional dwellings;
  - large schemes located in a commercial setting; or
  - developments the size of an entire or substantial part of an urban block.

### **Party Wall Act and security for expenses**

- 6.134 The Council encourages developers to offer security in all instances where basement schemes have a risk of causing damage to neighbouring properties. Many types of basement developments such as excavation near a neighbouring building will require that building owners meet a number of obligations under the Party Wall etc. Act 1996. These obligations include serving advanced notice of works, stating whether you will be strengthening or safeguarding the foundations of the neighbouring property and providing plans and sections. Under the Party Wall Act adjoining owners may request the building owner to provide a bond or insurances to provide security in the event of a dispute. Security bonds may be provided either as part of a party wall agreement or as a separate private arrangement between the developer or owner and the neighbour.

### **Flood risk**

- 6.135 The National Planning Policy Framework (NPPF) states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk” (paragraph 100). The Council will not allow habitable rooms and other sensitive uses for self contained basement flats and other underground structures in areas at risk of flooding. No parts of the borough are currently identified by the Environment Agency as being prone to flooding from waterways although some areas are subject to localised surface water flooding, as set out in Map 6: Historic flooding and Local Flood Risk Zones on page 266 and identified in the North London Strategic Flood Risk Assessment. Please see Section 8: Sustainability and Policy CC3 Water and flooding for more on the location of these areas and our approach to flooding.
- 6.136 The Council will require the submission of a development-specific flood risk assessment with applications for basements within flood risk areas identified on Map 6: Historic flooding and Local Flood Risk Zones, in the Flood Risk Strategy, or in any future updated Strategic Flood Risk Assessment in line with the criteria set out in the National Planning Practice Guidance on Flood Risk, unless it can be demonstrated to the Council’s satisfaction that the scale of the scheme is such that there is no, or minimal, impact on drainage conditions (refer to our supplementary planning document Camden Planning Guidance on sustainability for further information).

- 6.137 Some parts of Camden contain unusual and unstable subsoils, along with many underground streams and watercourses, making drainage and structural safety key concerns (including around Hampstead Heath). In such areas, applications for basement developments may be required to show through hydrological modelling whether it will be possible through the inclusion of drainage systems to prevent any significant harm from changes to groundwater levels or flow.
- 6.138 The use of Sustainable Drainage Systems (SuDS) will be encouraged in all basement developments that extend beyond the profile of the original building. For basements that encroach into garden space or reduce the area of permeable surface on the site, the use of SuDS will be required to mitigate any harm to the water environment. Further guidance on sustainable urban drainage is contained in Policy CC3 Water and flooding.

### Protection of gardens and trees

- 6.139 As set out in Policy A3 Biodiversity, the Council will protect green areas including gardens and retain and protect trees of significant amenity value and which make a positive contribution to the character and appearance of a conservation area. Basement development should be designed to retain and protect gardens and trees.
- 6.140 The protection of garden space to support large canopy trees is of particular importance near to open spaces. Basement development should be designed to avoid damage to trees both on or adjacent to the site, including street trees and the root protection zones needed by these trees. Where there are trees on or adjacent to the site, the Council will require an arboricultural report to be submitted as part of a planning application. Further information on protection of trees is available in our supplementary planning document Camden Planning Guidance on design.
- 6.141 Basement developments should mitigate any loss of storm water infiltration capacity or biodiversity habitat caused by that development through the planting of vegetation above the basement and other appropriate measures. This will usually take the form of a soft landscaping or retention pond on the top of the underground structure, which is designed to temporarily hold a set amount of water while slowly draining to another location. The Council expects that a minimum of 1 metre of soil is provided above the basement development, where this extends beyond the footprint of the building, to enable garden planting and for rainwater runoff and flood mitigation.

### Listed buildings

- 6.142 Basement development underneath a listed building can harm the fabric, structural integrity, layout, inter-relationships and hierarchy of spaces and architectural features of the building. The addition of a floor level beneath the original lowest floor level of a listed building (basement, cellar, or vault) may affect the hierarchy and historic integrity of the floor levels within the building. The development of a basement beneath a listed building can also necessitate the removal of significant parts of the original structure and fabric of the building.
- 6.143 The Council will only permit basements where they do not cause harm to the significance of a listed building or its garden. Listed buildings often form an

intrinsic element of the character of conservation areas and therefore basement development which harms the special architectural and historic interest of a listed building is also likely to fail to preserve or enhance the character or appearance of the conservation area in which it is located. Further details on the Council's approach to preserving heritage assets are set out in Policy D2 Heritage.

### Lightwells

- 6.144 Where basements and visible lightwells are not part of the prevailing character of a street, new lightwells should be discreet and not harm the architectural character of the building, the character and appearance of the surrounding area, or the relationship between the building and the street. In situations where lightwells are not part of the established street character, the characteristics of the front garden or forecourt will be used to help determine the suitability of lightwells.
- 6.145 In plots where the front garden is quite shallow, a lightwell is likely to consume much, or all, of the garden area. This will be unacceptable in streets where lightwells are not part of the established character and where the front gardens have an important role in the local townscape.
- 6.146 Lightwells to the side or rear of a property should be set away from the boundary of a neighbouring property. Excessively large lightwells will not be permitted in any garden space.





# 7. Design and Heritage

## Design

- 7.1 Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. The National Planning Policy Framework establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning.

### Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

#### Tall buildings

All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
- q. the historic context of the building's surroundings;
- r. the relationship between the building and hills and views;
- s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
- t. the contribution a building makes to pedestrian permeability and improved public accessibility.

In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.

#### **Public art**

The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.

#### **Excellence in design**

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.

### **Local context and character**

- 7.2 The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:
- character, setting, context and the form and scale of neighbouring buildings;
  - the character and proportions of the existing building, where alterations and extensions are proposed;
  - the prevailing pattern, density and scale of surrounding development;
  - the impact on existing rhythms, symmetries and uniformities in the townscape;
  - the composition of elevations;
  - the suitability of the proposed design to its intended use;
  - inclusive design and accessibility;
  - its contribution to public realm and its impact on views and vistas; and
  - the wider historic environment and buildings, spaces and features of local historic value.
- 7.3 The Council will welcome high quality contemporary design which responds to its context, however there are some places of homogenous architectural style (for example Georgian Squares) where it is important to retain it.
- 7.4 Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. Character is about people and communities as well as the physical components.

How places have evolved historically and the functions they support are key to understanding character. It is important to understand how places are perceived, experienced and valued by all sections of the community. People may value places for different reasons, often reflecting the services or benefits they provide for them. In addition, memory and association are also a component of how people understand a place. All of these values and experiences are part of understanding the character of a place. Planning applications should include a Design and Access Statement which assesses how the development has been informed by and responds to local context and character.

- 7.5 Design should respond creatively to its site and its context including the pattern of built form and urban grain, open spaces, gardens and streets in the surrounding area. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials.
- 7.6 The Council has two sets of documents which describe the character and appearance of areas and set out how we will preserve or enhance them. Each conservation area has a Conservation Area Statement or Appraisal and Management Strategy. These detailed documents have been developed with the relevant Conservation Area Advisory Committee and are adopted supplementary planning documents. For areas outside of conservation areas the Council commissioned the Camden Character Study to identify and record their character. This is not a formal supplementary planning document. These documents can help developers to inform their understanding of the specific character of the area in which their proposals are located. Policy D2 Heritage provides further guidance on the preservation and enhancement of the historic





environment. When assessing design, we will also take into account guidance contained within supplementary planning document Camden Planning Guidance on design. For areas where Neighbourhood Plans are being prepared, these documents will form a valuable source of information on the character of the local area.

### **Sustainable design and durability**

- 7.7 The Council expects development to be sustainable in design and construction. Development should be consistent with the policies set out in section 8 of this plan on sustainability and also consistent with Camden Planning Guidance on sustainability.
- 7.8 Design should be durable in construction and where appropriate should be flexible and adaptable for a range of uses over time, a quality known as robustness. Robustness is influenced by factors including the size and shape of rooms, points of access and the depth of floorplates. The overall quality of a building is also a consideration as buildings with character and charm are more likely to be retained and adapted.

### **Details and materials**

- 7.9 Architectural detailing should be carefully integrated into a building. In new development, detailing should be carefully considered so that it conveys quality of design and creates an attractive and interesting building. Architectural features on existing buildings should be retained wherever possible, as their loss can harm the appearance of a building by eroding its detailing. The insensitive replacement of windows and doors can spoil the appearance of buildings and can be particularly damaging if the building forms part of a uniform group.
- 7.10 Schemes should incorporate materials of a high quality. The durability and visual attractiveness of materials will be carefully considered along with their texture, colour, tone and compatibility with existing materials. Alterations and extensions should be carried out in materials that match the original or neighbouring buildings, or, where appropriate, in materials that complement or enhance a building or area.

### **Street frontages and legibility**

- 7.11 Building facades should be designed to provide active frontages and respond positively to the street. Active frontages are building facades that allow people on the street to see inside the building. A more active type of frontage is one where the use opens out to the street, like a shop with a window display and entrance, or a use like a café or restaurant with outdoor dining. Active frontages add interest and vitality to public spaces. Views into buildings provide interest to passers-by and views out of buildings provide safety through passive surveillance or 'eyes on the street'. Positive factors for frontages are entrances, shop fronts and windows. Negative factors include long blank facades, high boundary walls, solid roller shutters and service entrances and yards.
- 7.12 Buildings and spaces should also allow people to easily navigate their way around an area – a quality known as legibility. Designs should provide

recognisable routes and be easy to understand. Buildings and spaces should be permeable by providing clear and direct routes between places. Routes should be direct, safe and attractive for walking and cycling.

- 7.13 Ground floors in new developments should have a storey height appropriate to their use. In mixed use schemes where a commercial use is provided on the ground floor this should typically have a more generous storey height (of approximately 4.5m). Further information on the design of retail spaces is in Policy TC2 Camden's centres and other shopping areas.

### Access

- 7.14 Good access benefits everyone. The Council requires new buildings and spaces to be inclusive and accessible to all. As accessibility is influenced by perceptions as well as physical factors, buildings should also be designed to appear, as well as be, fully accessible. The Council will require Design and Access Statements for developments to show how the principles of inclusive design, ensuring access for all, have been integrated into the proposed development and how inclusion will be maintained and managed.
- 7.15 Making roads and pavements and the spaces between buildings fully accessible is as important as making the buildings themselves accessible. The Council will seek improvements for all pedestrians to ensure good quality access and circulation arrangements, including improvements to existing routes and footways. The Camden Streetscape Design Manual and our supplementary planning documents Camden Planning Guidance on design and Camden Planning Guidance on amenity provide more detailed information on this issue.
- 7.16 Any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building's character and appearance. Please refer to "Policy C6 Access for all" for the Council's policies on access and to Policy D2 Heritage for the policy on providing access to listed buildings.

### Health

- 7.17 The way an area is designed and managed can have a significant impact on people's quality of life, health and wellbeing. Planning has a key role in promoting good physical and mental health by creating streets, spaces and buildings which allow and encourage healthy lifestyles. Architecture and urban design can affect human health through the quality and design of buildings and spaces, access to open space and nature, air quality, noise, opportunities for active transport such as walking and cycling, crime reduction and social cohesion. The Council will require applicants to consider how development will contribute to improving health. Please see Policy C1 Health and wellbeing and Sport England's Active Design Guidance for further information on the principles of Active Design.

### Secure design and crime prevention through urban design

- 7.18 Design should create safe and attractive places and be designed to prevent crime and antisocial behaviour. The impacts of proposals on crime and community safety should be considered and addressed from an early stage in the design process to prevent the need for reactive security measures. Access

and movement routes, the layout of buildings, overlooking and active frontages, lighting, the clear delineation of spaces and ownership and the creation of activity all play a role in designing out crime. The Council will seek to maintain good accessibility in urban areas to foster flows of movement which produce vitality and natural surveillance and in doing so increase safety. Gating as a solution to crime and antisocial behaviour problems will be resisted unless there are exceptional circumstances. Further details are set out in supplementary planning document Camden Planning Guidance on design and in the document Safer Places – The Planning System and Crime Prevention (ODPM April 2004). Please refer to Policy C5 Safety and security for further information.

### **Responding to natural features and preserving gardens and open space**

- 7.19 New developments should respond to the natural assets of a site and its surroundings, such as slopes and height differences, trees and other vegetation. Extensions and new developments should not harm existing natural habitats, including in private gardens. Policy A3 Biodiversity sets out the Council's policy on nature conservation, protecting trees and biodiversity.
- 7.20 Development within rear gardens and other undeveloped areas can often have a significant impact upon the amenity and character of an area. The Council will resist development that occupies an excessive part of a garden and where there is a loss of garden space which contributes to the character of the townscape.
- 7.21 The Council will resist development which fails to preserve or is likely to damage trees on a site which make a significant contribution to the character and amenity of an area. Where appropriate the Council will seek to ensure that developments make adequate provision for the planting and growth to maturity of large trees.



### Landscape design and greening

- 7.22 The Council will expect development schemes to provide a high standard of landscape design and encourages the development of green and brown roofs and walls. The design of new hard and soft landscaping should be contextual and consider access requirements. Where appropriate, the Council will expect planting plans to be accompanied by a maintenance schedule. Detail on our approach to green infrastructure and landscape design is set out in Camden Planning Guidance on design and Camden Planning Guidance on sustainability supplementary planning documents.

### Amenity space

- 7.23 Private outdoor amenity space including gardens, balconies and roof terraces, can add significantly to resident's quality of life and applicants are therefore encouraged to explore all options for the provision of new private outdoor space. Please refer to Policy A2 Open space for the Council's approach to ensuring that new open space is provided in development. The Council also requires that the residential amenity of neighbours be considered in accordance with Policy A1 Managing the impact of development.

### Public art

- 7.24 The Council encourages provision of high quality public art in development where appropriate. Public art can help to create a distinctive character to places and spaces. As well as adding visual interest it can influence the use of a space, encouraging or discouraging particular uses, or it can act as a focal point to provide directions. Public art can take many forms and occupy sites and spaces that span a range of scales and of varying character. It may take the more traditional form of a sculpture or other artwork in a public space but could also be conceived as a garden, the façade of a building or a lighting installation. Public art should be designed to be an integral part of a new development.
- 7.25 In assessing applications for artworks, statues and memorials the Council will also take into consideration the matters set out in the supplementary planning document Camden Planning Guidance on design, including:
- the number of artworks, statues, or memorials already in the area;
  - whether the proposal has contextual and historic connections to the site; and
  - whether the proposal meets the Council's corporate guidance on artworks, statues and memorials.

### Views

- 7.26 A number of London's most famous and valued views originate in, or extend into, Camden. These are:
- views of St Paul's Cathedral from Kenwood, Parliament Hill and Primrose Hill;
  - views of the Palace of Westminster from Primrose and Parliament Hills; and
  - background views of St Paul's from Greenwich and Blackheath.
- 7.27 The Council will protect these views in accordance with London-wide policy and will resist proposals that would harm them. Where existing buildings that affect a view are redeveloped it is expected that any replacement building will

be of a height that does not harm the view. The current framework for protecting these views is set by the London Plan (policies 7.11 and 7.12) and the Mayor's London View Management Framework supplementary planning guidance.

- 7.28 The Council will also consider the impact of a scheme, in terms of the townscape, landscape and skyline, on the whole extent of a view ('panorama'), not just the area in the view corridor. Developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces. They should seek to avoid buildings that tightly define the edges of the viewing corridors and not create a crowding effect around the landmark.
- 7.29 The Council will also seek to protect locally important views that contribute to the interest and character of the borough. These include:
- views of and from large public parks and open spaces, such as Hampstead Heath, Kenwood Estate, Primrose Hill and Regent's Park, including panoramic views, as well as views of London Squares and historic parks and gardens;
  - views relating to Regent's Canal;
  - views into and from conservation areas; and
  - views of listed and landmark buildings, monuments and statutes (for example, Centrepont, St Stephen's, Rossllyn Hill and St George's, Bloomsbury).
- 7.30 The Council will seek to ensure that development is compatible with such views in terms of setting, scale and massing and will resist proposals that we consider would cause harm to them. Development will not generally be acceptable if it obstructs important views or skylines, appears too close or too high in relation to a landmark or impairs outlines that form part of the view. Further guidance on important local views is set out in our supplementary planning documents, for example in individual conservation area statements, appraisals and management strategies.
- 7.31 The Council recognises that neighbouring boroughs have identified views for protection in supplementary planning documents and that development on some sites within Camden could affect these views. The Council will take into consideration these protected views of neighbouring authorities when deciding planning applications.

### **Design of housing**

- 7.32 All residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, both new build and change of use:
- is self-contained and has its own secure private entrance;
  - has good ceiling heights and room sizes;
  - is dual aspect except in exceptional circumstances;
  - has good natural light and ventilation;
  - has good insulation from noise and vibration;
  - has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities);
  - incorporates adequate storage space;
  - incorporates outdoor amenity space including balconies or terraces; and
  - is accessible and adaptable for a range of occupiers.



- 7.33 New dwellings and conversions to residential use will be expected to meet the government's nationally described space standard as set out in London Plan Table 3.3. The Council will also require development to adhere to the Mayor's Housing Supplementary Planning Guidance.

#### **Building services equipment**

- 7.34 Building services equipment, such as air cooling, heating, ventilation and extraction systems, lift and mechanical equipment, as well as fire escapes, ancillary plant and ducting should be contained within the envelope of a building or be located in a visually inconspicuous position.

#### **Tall buildings**

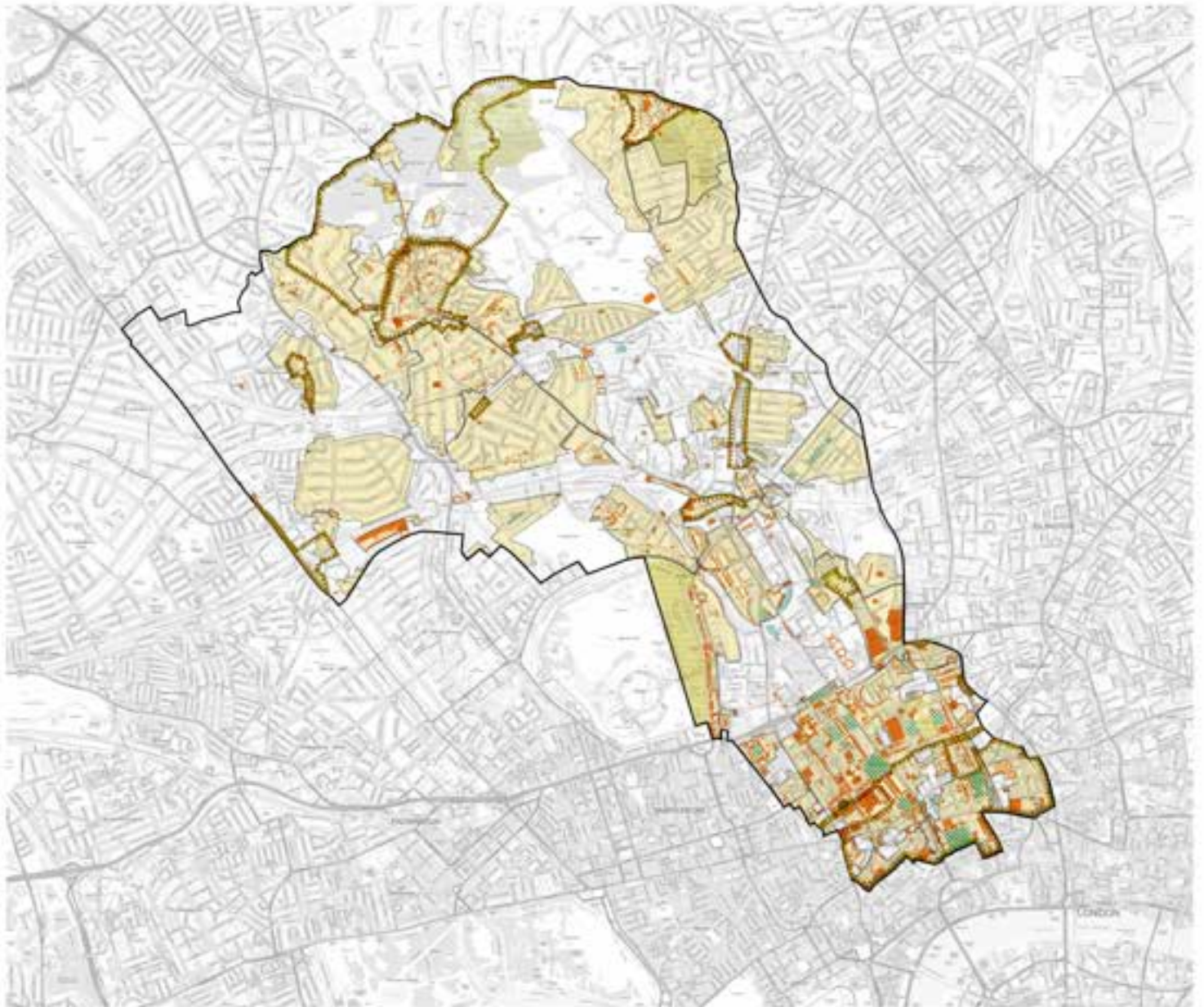
- 7.35 For this policy tall buildings are considered to be those which are substantially taller than their neighbours or which significantly change the skyline. While tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered in order not to detract from the nature of surrounding places and the quality of life for living and working around them. Applications for tall buildings will be considered against Local Plan policies on design and heritage, along with the full range of policies, including those on mixed use, sustainability, amenity and microclimate. The effect on views and provision of communal and private amenity space will also be important considerations. In assessing applications for tall buildings the Council will have regard to the London Plan Policy 7.7 on the location of tall and large buildings and the Historic England Advice Note 4 on Tall Buildings.
- 7.36 Due to the dense nature of Camden with extensive range and coverage of heritage assets, such as conservation areas, numerous listed buildings and five strategic views and two background views crossing the borough, the Council do not consider that it is practical to identify broad areas either suitable, or not suitable, for tall buildings. In the borough, a site may be suitable for a tall building while adjacent sites are not, due to impact on either views, conservations areas or listed buildings. Indeed, in some cases, suitability for a tall building differs across a single site. Given Camden's environmental characteristics, the entire borough is considered as being within the 'sensitive' category, as defined by the English Heritage / CABE Guidance on Tall Buildings. Tall building proposals in Camden will therefore merit detailed design assessments.
- 7.37 Further relevant guidance to the Council's approach to tall buildings is set out in:
- Area Action Plans including the Euston Area Plan and the Fitzrovia Area Action Plan;
  - Site Allocations;
  - Conservation area appraisals and management strategies;
  - The Camden Character Study; and
  - Neighbourhood Plans.
- 7.38 The Council will take these documents into account where relevant in assessing applications for tall buildings.

# Heritage

## Camden's heritage

- 7.39 Camden has a rich architectural heritage with many special places and buildings from throughout Camden's history (see Map 4: Heritage and Archaeological Sites on page 234). 39 areas, covering much of the borough, are designated as conservation areas, recognising their special architectural or historic interest and their character and appearance. We have prepared conservation area statements, appraisals and management strategies that provide further guidance on the character of these areas. We will take these documents into account as material considerations when we assess applications for planning permission in these areas.
- 7.40 Over 5,600 buildings and structures in Camden are nationally listed for their special historical or architectural interest and 53 of the borough's squares are protected by the London Squares Preservation Act 1931. In addition, 14 open spaces in Camden are on Historic England's Register of Parks and Gardens. The Council also maintains a local list of over 400 non-designated heritage assets. Camden also has a generally well-preserved archaeological heritage, with 13 identified archaeological priority areas, although this can be vulnerable to development and changes in land use.
- 7.41 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings.

Map 4: Heritage and Archaeological Sites



- Conservation area
- London Squares
- Borough boundary
- Listed building
- Gardens and Squares of Historic Interest
- Archaeological priority area

## Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

### Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

### Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. 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.

### Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.

### Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

### Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

## Enhancing the historic environment

7.42

The Council has a proactive approach to conserving heritage assets. In addition to the application of Local Plan policies the Council protects the historic environment through the following areas of work:

- Conservation Area Management Strategies: The Council works with the Conservation Area Advisory Committees to update and support the implementation of the strategies.
- Heritage at Risk: The Council identifies buildings and structures at risk and proactively seeks to conserve and where required put them back into viable use, including identifying sources of funding.
- Local list of undesignated heritage assets: The Council introduced the local list in 2015 and it will be updated annually.
- Guidance: The Council has adopted detailed guidance for the preservation of heritage assets in the supplementary planning document Camden Planning Guidance on design, and Retrofitting Planning Guidance (for sustainability measures in historic buildings). The Council updates planning guidance as required.



- Area based work: Conservation and enhancement of the historic environment is a key objective of area action plans and the Site Allocations. The Fitzrovia Area Action Plan for example sets principles for developing key sites which retain and enhance the setting of listed buildings.

7.43 The Council recognises that development can make a positive contribution to, or better reveal the significance of, heritage assets and will encourage this where appropriate. Responding appropriately to the significance of heritage assets and its setting can greatly enhance development schemes (for example, King's Cross Central).

### **Designated heritage assets**

7.44 Designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas. The Council will apply the policies above and will not permit harm to a designated heritage asset unless the public benefits of the proposal outweigh the harm. Further guidance on public benefits is set out in National Planning Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20140306). Any harm to or loss of a designated heritage asset will require clear and convincing justification which must be provided by the applicant to the Council. In decision making the Council will take into consideration the scale of the harm and the significance of the asset.

7.45 In accordance with the National Planning Policy Framework the Council will only permit development resulting in substantial harm to or loss to a grade II listed building, park or garden in exceptional circumstances and will only permit development resulting in substantial harm to or loss to a grade I and II\* listed building, grade I and II\* registered park or garden in wholly exceptional circumstances.

### **Conservation areas**

7.46 In order to preserve or enhance important elements of local character, we need to recognise and understand the factors that create that character. The Council has prepared a series of conservation area statements, appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas and set out how we consider they can be preserved or enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a way that retains the distinctive characters of our conservation areas and will expect new development to contribute positively to this. The Council will therefore only grant planning permission for development in Camden's conservation areas that preserves or enhances the special character or appearance of the area.

7.47 The character of conservation areas derive from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing and uses. These elements should be identified and responded to in the design of new development. Design and Access Statements should include an assessment of local context and character and set out how the development has been informed by it and responds to it.



- 7.48 Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.

#### **Demolition in conservation areas**

- 7.49 The Council has a general presumption in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area, whether they are listed or not, so as to preserve this character and appearance. The Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless circumstances are shown that outweigh the case for retention. Applicants will be required to justify the demolition of a building that makes a positive contribution to a conservation area, having regard to the National Planning Policy Framework, Camden's conservation area statements, appraisals and management strategies and any other relevant supplementary guidance produced by the Council.
- 7.50 When considering applications for demolition, the Council will take account of group value, context and the setting of buildings, as well as their quality as individual structures and any contribution to the setting of listed buildings. Applications must clearly show which buildings or parts of buildings are to be demolished.

7.51 Applications for total or substantial demolition in conservation areas must demonstrate to the Council's satisfaction that effective measures will be taken during demolition and building works to ensure structural stability of retained parts and adjoining structures. Before planning permission for demolition is granted, the Council must be satisfied that there are acceptable detailed plans for the redevelopment.

7.52 In addition proposals for demolition and reconstruction should be justified in terms of the optimisation of resources and energy use in comparison with the existing building. Further details on this are in Policy CC1 Climate change mitigation.

### **Use**

7.53 Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment. Two uses of particular importance to the character of conservation areas are pubs and local shops, especially when they are located in historic buildings. The Council will protect these uses as set out in Policy C4 Public houses and Section 9 Town centres and shops.

### **Details**

7.54 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the original. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration. The Council will consider the introduction of Article 4 Directions to remove permitted development rights for the removal or alterations of traditional details where the character and appearance of a conservation area is considered to be under threat.

### **Landscape**

7.55 The value of existing gardens, trees and landscape to the character of the borough is described in Policy A2 Open space and they make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.

### **Sustainable design and retrofitting**

7.56 Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration

the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas and the Historic England website.

### Listed buildings

- 7.57 Camden's listed buildings and structures provide a rich and unique historic and architectural legacy. They make an important and valued contribution to the appearance of the borough and provide places to live and work in, well known visitor attractions and cherished local landmarks. We have a duty to preserve and maintain these for present and future generations.
- 7.58 The Council has a general presumption in favour of the preservation of listed buildings. Total demolition, substantial demolition and rebuilding behind the façade of a listed building will not normally be considered acceptable. The matters which will be taken into consideration in an application for the total or substantial demolition of a listed building are those set out in the National Planning Policy Framework.
- 7.59 In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Consent is required for any alterations, including some repairs, which would affect the special interest of a listed building.
- 7.60 The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it can often extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement.

### Access in listed buildings

- 7.61 Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.

### Sustainability measures in listed buildings

- 7.62 Proposals that reduce the energy consumption of listed buildings will be welcomed provided that they do not cause harm to the special architectural and historic interest of the building or group. Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and



heating and lighting systems and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics.

## Archaeology

- 7.63 Camden has a rich archaeological heritage which comprises of both above and below ground remains, in the form of individual finds, evidence of former settlements and standing structures. These remains are vulnerable to modern development and land use. There are currently 13 archaeological priority areas in the borough (see Map 4: Heritage and Archaeological Sites) although these are scheduled for review in 2017.
- 7.64 The archaeological priority areas provide a general guide to areas of archaeological remains, but do not indicate every find site in the borough. These are based on current knowledge and may be refined or altered as a result of future archaeological research or discoveries.
- 7.65 It is likely that archaeological remains will be found throughout the borough, both within and outside the archaeological priority areas. Many archaeological remains have yet to be discovered, so their extent and significance is not known. When researching the development potential of a site, developers should, in all cases, assess whether the site is known or is likely to contain archaeological remains. Where there is good reason to believe that there are remains of archaeological importance on a site, the Council will consider directing applicants to supply further details of proposed developments, including the results of archaeological desk-based assessment and field





evaluation. Scheduled monument consent must be obtained before any alterations are made to scheduled ancient monuments. Camden has only one scheduled ancient monument: Boadicea's Grave in Hampstead Heath.

- 7.66 If important archaeological remains are found, the Council will seek to resist development which adversely affects remains and to minimise the impact of development schemes by requiring either in situ preservation or a programme of excavation, recording, publication and archiving of remains. There will usually be a presumption in favour of in situ preservation of remains and, if important archaeological remains are found, measures should be adopted to allow the remains to be permanently preserved in situ. Where in situ preservation is not feasible, no development shall take place until satisfactory excavation and recording of the remains has been carried out on site and subsequent analysis, publication and archiving undertaken by an archaeological organisation approved by the Council.
- 7.67 The Council will consult with, and be guided by, Historic England and the Greater London Archaeology Advisory Service (GLAAS) on the archaeological implications of development proposals. The Greater London Historic Environment Record, maintained by Historic England, contains further information on archaeological sites in Camden. When considering schemes involving archaeological remains, the Council will also have regard to the National Planning Policy Framework.

### Other heritage assets

- 7.68 In addition to conservation areas, listed buildings and archaeological remains, Camden contains 14 registered parks and gardens, as identified by Historic England. There are also 53 London squares in the borough protected by the London Squares Preservation Act 1931. The Council will encourage the management of registered parks and gardens and London squares to maintain, and where appropriate, enhance their value and protect their setting. The Council will consult with Historic England over proposals affecting these parks and gardens. We also encourage the restoration and management of registered parks and gardens and London squares to enhance their value.

### Non designated heritage assets

- 7.69 The borough also has many attractive, historic, locally significant buildings and features which contribute to the distinctiveness of local areas, but which are not formally designated. The National Planning Policy Framework identifies these features as non-designated heritage assets. Non-designated heritage assets may either be identified as part of the planning process or on Camden's Local List. Camden's Local List identifies historic buildings and features that are valued by the local community and that help give Camden its distinctive identity but are not already designated in another way (for example a listed building). When planning permission is required for any proposal that directly or indirectly affects the significance of a non-designated heritage asset (either on the Local List or not) then the Council will treat the significance of that asset as a material consideration when determining the application. The Local List is available at [www.camden.gov.uk/localist](http://www.camden.gov.uk/localist).

## Shopfronts

- 7.70 Shopfronts contribute greatly to the character of centres and their distinctiveness. Most of Camden's town and neighbourhood centres date back to the 19th Century and earlier, having developed from commercial activities that first took place within dwellings, although there are some significant 20th Century shopping parades.
- 7.71 Please refer to Policy TC2 Camden's centres and other shopping areas for policy on the design of new retail spaces.

### Policy D3 Shopfronts

The Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features.

When determining proposals for shopfront development the Council will consider:

- a. the design of the shopfront or feature, including its details and materials;
- b. the existing character, architectural and historic merit and design of the building and its shopfront;
- c. the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;
- d. the general characteristics of shopfronts in the area;
- e. community safety and the contribution made by shopfronts to natural surveillance; and
- f. the degree of accessibility.

The Council will resist the removal of shop windows without a suitable replacement and will ensure that where shop, service, food, drink and entertainment uses are lost, a shop window and visual display is maintained.

Where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention. Where a new shopfront forms part of a group where original shop fronts survive, its design should complement their quality and character.

### Protecting existing shopfronts

- 7.72 Shopfronts form an essential part of the character and attractiveness of many areas in Camden, in particular its centres, and contribute to the creation of vibrant streets and public spaces. We will seek to protect existing shopfronts that make a significant contribution to the appearance and character of an area, for example through their architectural and historic merit. We will consider the need to keep the appearance of the shopfront, taking into account the quality of its design, its historic importance and its location. Good examples of shopfronts should be retained wherever possible.

- 7.73 A number of Camden's centres lie within conservation areas. The Council has prepared conservation area statements, appraisals and management strategies for these which set out detailed information on the area and its character and the Council's approach to their preservation and enhancement, including, where relevant, shopfronts.

#### Design of new shopfronts

- 7.74 The quality of shopfronts and the way in which they relate to their surroundings make an important contribution to the character and attractiveness of an area. The Council will therefore seek to ensure that new shopfronts are of a high quality and are sensitive to the area in which they are located. Transparent shopfronts will be sought for units containing shops and other town centre uses, due to the contribution that they make to the vitality and attraction of centres.
- 7.75 The Council considers that the attractiveness of shopfronts can usually best be maintained by taking inspiration from the architecture of the building and neighbouring premises and reflecting the general scale and pattern of shopfront widths in the area. New shopfronts should contribute towards the maintenance of a cohesive streetscape appearance, retain a consistent building line and contribute to the character and attractiveness of the centre they are located in. As shopfronts are seen at close quarters, the detailing, type and quality of materials, execution and finishes are very important. Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all.



### Replacement shopfronts

- 7.76 If a shopfront is replaced or altered, the design should respect the characteristics of the building and, where appropriate, shopfront windows and framework features, such as pilasters, fascias and console brackets, should be retained or restored. Careful consideration will be given to proposals for excavating or re-opening lightwells in front of shopfronts, particularly those in a group, as they can affect the cohesiveness of a frontage.
- 7.77 Folding or opening shopfronts will not generally be acceptable, as they can create a void at ground level that can harm the appearance of a building and can also have a negative impact on local amenity, for example in terms of noise and disturbance.

### Shop windows

- 7.78 Shop windows provide views into and from premises and can help bring activity and enhance feelings of security by providing natural surveillance. Displays in shop windows can add to the attractiveness of a premises and the vitality and attraction of the centre. Security features associated with shop window displays should be internal in order to avoid harming the appearance of shop premises and creating clutter. Solid shutters are only considered to be acceptable in exceptional cases as they are unsightly and can generate feelings of insecurity in those walking by, hide internal intruders and encourage graffiti.
- 7.79 Lighting from shop windows can help to increase security after dark. The Council may therefore seek the maintenance of some shopfront lighting overnight, where appropriate, particularly in areas identified as having high levels of crime. However, this lighting should be well designed so it does not cause light pollution.
- 7.80 The Council discourages shop window displays and graphics that completely obstruct views into the shop (for example vinyl graphics applied to the window). The layout of shop units should be designed to overcome the need for excessive window graphics, for example to hide shelving. The supplementary planning document Camden Planning Guidance on design provides more detail on the Council's approach to the design of shopfronts.

## Advertisements

- 7.81 This policy applies to all advertisements requiring advertisement consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Certain types of advertisements do not require advertisement consent and are regarded as having ‘deemed consent’ as they meet the specifications set out in the regulations. Information on what types of advertisements require consent is set out in Outdoor advertisements and signs: a guide for advertisers (Communities and Local Government, June 2007). Advertisements are only controlled in respect to their effect on amenity and public safety. Further guidance on Camden’s approach to advertisements is available in the supplementary planning document Camden Planning Guidance on advertisements.

### Policy D4 Advertisements

The Council will require advertisements to preserve or enhance the character of their setting and host building. Advertisements 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.

We will support advertisements that:

- a. preserve the character and amenity of the area; and
- b. preserve or enhance heritage assets and conservation areas.

We will resist advertisements that:

- c. contribute to an unsightly proliferation of signage in the area;
- d. contribute to street clutter in the public realm;
- e. cause light pollution to nearby residential properties or wildlife habitats;
- f. have flashing illuminated elements; or
- g. impact upon public safety.

The Council will resist advertisements on shopfronts that are above fascia level or ground floor level, except in exceptional circumstances.

Shroud advertisements, banners, hoardings / billboards / large outdoor signboards are subject to further criteria as set out in supplementary planning document Camden Planning Guidance on advertisements .

### Character and amenity

- 7.82 Advertisements and signs should be designed to be complementary to and preserve the character of the host building and local area. The size, location, materials, details and illumination of signs must be carefully considered. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment. The Council will resist advertisements where they contribute to or constitute clutter or an unsightly proliferation of signage in the area.



### **Heritage and conservation areas**

- 7.83 Advertisements in conservation areas and on or near listed buildings require particularly detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.

### **Street furniture and the public realm**

- 7.84 Street furniture includes objects placed on the street including traffic signs and signals, benches, street names, CCTV cameras, lighting, cycle parking, guardrails, bollards and bus shelters. The Council aims to reduce visual street clutter, reducing the number of objects on the street, rationalising their location and limiting the palette of materials. Free standing signs and signs on street furniture will not normally be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway.

### **Illumination and light pollution**

- 7.85 Advertisements should not become unduly dominant in the street scene, cause light pollution that disturbs residents at night, cause light pollution to wildlife habitats, or cause safety hazards to drivers. To achieve these aims, consideration should be given to the intensity of illumination, surface area to be illuminated and the positioning and colours of advertisements. The type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon, etc.) should be determined by the design of the building. Illuminated signs, both internal and external, should not be flashing or intermittent.

### **Impact on safety**

- 7.86 Advertisements will not be considered acceptable where they impact upon public safety, including when they:
- obstruct or impair sight lines to road users at junctions and corners;
  - reduce the effectiveness of a traffic sign or signal;
  - result in glare and dazzle or distract road users;
  - distract road users because of their unusual nature;
  - disrupt the free flow of pedestrian movement; or
  - endanger pedestrians forcing them to step on to the road.

### **Placement of advertisements on shopfronts**

- 7.87 Generally shopfront advertisements will only be acceptable at the ground floor level, at fascia level or below. Fascia in this context refers to the signboard on the upper part of a shopfront showing the name of the shop. Advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties.

**Discontinuance**

- 7.88 The Council takes a proactive approach to preserving or enhancing the townscape and public realm. Where existing advertisements with deemed consent are considered to harm the character and amenity of a building or local area the Council will, where appropriate seek removal of these advertisements, which may include serving of discontinuance notices.

**Estate agent boards**

- 7.89 A certain number and size of estate agent boards can be erected on properties without the benefit of advertisement consent. Areas may be exempted from this deemed consent under Regulation 7 of the 1992 Regulations. In these areas no boards will be granted advertisement consent by the Council because of their effect on visual amenity, except in exceptional circumstances. Please refer to the Camden website for the list of exempted areas.

# 8. Sustainability and climate change

## Climate change mitigation

- 8.1 The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and assess the feasibility of decentralised energy and renewable energy technologies.
- 8.2 Green Action for Change: Camden's environmental sustainability plan (2011-2020) commits Camden to a 27% borough wide Carbon Dioxide (CO<sub>2</sub>) reduction by 2017 and a 40% borough wide CO<sub>2</sub> reduction by 2020 (London carbon reduction target). Over 90% of Camden's carbon dioxide emissions are produced by the operation of buildings.
- 8.3 Any new development in Camden has the potential to increase carbon dioxide emissions in the borough. If we are to achieve local, and support national, carbon dioxide reduction targets, it is crucial that planning policy limits carbon dioxide emissions from new development wherever possible and supports sensitive energy efficiency improvements to existing buildings.

### Policy CC1 Climate change mitigation

The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

We will:

- a. promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;
- b. require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
- c. ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
- d. support and encourage sensitive energy efficiency improvements to existing buildings;
- e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
- f. expect all developments to optimise resource efficiency.

For decentralised energy networks, we will promote decentralised energy by:

- g. working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;
- h. protecting existing decentralised energy networks (e.g. at Gower Street, Bloomsbury, King's Cross, Gospel Oak and Somers Town) and safeguarding potential network routes; and

- i. requiring all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.

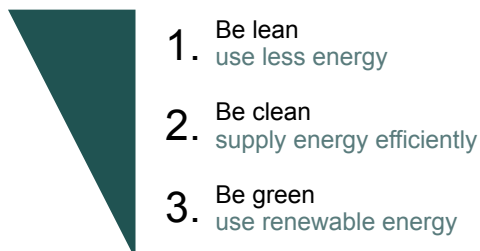
8.4 The Council commissioned two borough wide carbon reduction studies to ensure that local planning policy appropriately responds to the carbon emissions reduction challenge. Our first study, 'Delivering a low carbon Camden', considered carbon reduction scenarios to 2050 to align with the long-term national 80% carbon dioxide reduction target within the Climate Change Act 2008. Our later 2010 study focused specifically on the challenges of achieving a carbon dioxide reduction target of 40% by 2020.

8.5 Both studies concluded that meeting borough carbon dioxide reduction targets depends on the growth of Combined Heat and Power (CHP) led decentralised energy networks; the extensive thermal improvement of existing housing stock; behavior change; the significant deployment of appropriate renewable technologies; and the steady decarbonisation of the national electricity grid.

### The energy hierarchy

8.6 The Council's Sustainability Plan 'Green Action for Change' commits the Council to seek low and where possible zero carbon buildings. New developments in Camden will be expected to be designed to minimise energy use and CO2 emissions in operation through the application of the energy hierarchy. It is understood that some sustainable design measures may be challenging for listed buildings and some conservation areas and we would advise developers to engage early with the Council to develop innovative solutions.

8.7 The energy hierarchy is a sequence of steps that minimise the energy consumption of a building. Buildings designed in line with the energy hierarchy prioritise lower cost passive design measures, such as improved fabric performance over higher cost active systems such as renewable energy technologies. The following diagram shows a simplified schematic of the energy hierarchy, which is explained further in supplementary planning document Camden Planning Guidance on sustainability.



8.8 All developments involving five or more dwellings and/or more than 500 sqm of (gross internal) any floorspace will be required to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction. All new residential development will also be



required to demonstrate a 19% CO<sub>2</sub> reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy). This can be demonstrated through an energy statement or sustainability statement.

### **Be lean**

- 8.9 Proposals should demonstrate how passive design measures including the development orientation, form, mass, and window sizes and positions have been taken into consideration to reduce energy demand, demonstrating that the minimum energy efficiency requirements required under building regulations will be met and where possible exceeded. This is in line with stage one of the energy hierarchy 'Be lean'.

### **Be clean**

- 8.10 The second stage of the energy hierarchy 'Be clean' should demonstrate how the development will supply energy efficiently through decentralised energy. Please refer to the section below on decentralised energy generation.

### **Be green**

- 8.11 The Council will expect developments of five or more dwellings and/or more than 500 sqm of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy), unless it can be demonstrated that such provision is not feasible. This is in line with stage three of the energy hierarchy 'Be green'. The 20% reduction should be calculated from the regulated CO<sub>2</sub> emissions of the development after all proposed energy efficiency measures and any CO<sub>2</sub> reduction from non-renewable decentralised energy (e.g. CHP) have been incorporated.
- 8.12 All major developments will also be expected to demonstrate how relevant London Plan targets for CO<sub>2</sub> reduction, including targets for renewable energy, have been met. Where it is demonstrated that the required London Plan reductions in carbon dioxide emissions cannot be met on site, the Council will require a financial contribution to an agreed borough wide programme to provide for local low carbon projects. The borough wide programme will be connected to key projects identified in the Council's Green Action for Change.
- 8.13 In cases where standards change or are superseded, the Council will use the equivalent replacement standards.

## **Sustainable patterns of development**

- 8.14 The location of development and mix of land uses have a significant influence on the amount of energy used for transport, as well as whether we can generate or supply local energy efficiently. The Council will seek to make the most efficient use of Camden's limited land and steer growth and uses that will generate a large number of journeys to the most accessible parts of the borough. Development will be focused in Camden's growth areas, with other highly accessible locations, such as Central London and most of our town centres, also considered suitable for development that significantly increases travel demand. Please also refer to Policy G1 Delivery and location of growth.

## Resource efficiency, demolition and retrofitting existing buildings

### Resource efficiency and demolition

- 8.15 Given the significant contribution existing buildings make to Camden's CO2 emissions, the Council will support proposals that seek to sensitively improve the energy efficiency of existing buildings. Further guidance on how the energy performance of existing homes in conservation areas can be improved without harming the character and appearance of the area can be found in our supplementary planning documents ('Energy efficiency planning guidance for conservation areas' and 'Retrofitting planning guidance'). Policy D2 Heritage further explains that the Council will take into consideration the public benefits gained from the improved energy efficiency of existing buildings.
- 8.16 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 possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed. Many historic buildings display qualities that are environmentally sustainable and have directly contributed to their survival, for example the use of durable, natural, locally sourced materials, 'soft' construction methods, good room proportions, natural light and ventilation and ease of alteration.
- 8.17 All proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Where the demolition of a building cannot be avoided, we will expect developments to divert 85% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. We will also require developments to consider the specification of materials and construction processes with low embodied carbon content.
- 8.18 We will expect all developments, whether for refurbishment or redevelopment, to optimise resource efficiency by:
- reducing waste;
  - reducing energy and water use during construction;
  - minimising materials required;
  - using materials with low embodied carbon content; and
  - enabling low energy and water demands once the building is in use.

### Embodied carbon

- 8.19 Embodied carbon is the carbon impact associated with the production, transport, assembly, use and disposal of materials. This will include consideration of maintenance and repair but does not include the carbon emissions associated with the energy used for heating, lighting or cooling in the completed building (please see Policy T4 Sustainable movement of goods and materials). Additionally, the Council will expect developers to consider the service life of buildings and their possible future uses to optimise resource efficiency. The durability and lifespan of the buildings' components should be matched to its



likely service life, and where appropriate the building should be designed to be flexible in terms of adaptation to future alternative uses in order to avoid the need for future demolition.

8.20 As part of the assessment of resource efficiency, all developments involving five or more dwellings and/or more than 500 sqm gross internal floor space are encouraged to assess the embodied carbon emissions associated with the development within the energy and sustainability statement. Where such an assessment has been completed we would encourage that the results are logged on the WRAP embodied carbon database in order to contribute to the embodied carbon knowledge base.

8.21 Further guidance on resource efficiency and embodied carbon assessment can be found in supplementary planning document Camden Planning Guidance on sustainability.

### **Decentralised energy generation**

8.22 Decentralised energy systems generate and supply electricity, heating or cooling close to where it is used, rather than at a large plant elsewhere and sent through the national grid. This method reduces transmission losses and lowers carbon emissions. Given the key role decentralised energy is expected to play in borough-wide carbon dioxide reduction, the Council shall expect new developments to play a pivotal role in their growth. Existing decentralised energy networks operate in Gower Street, King's Cross, Bloomsbury, Gospel Oak and Somers Town. It is important that Transport for London is consulted on proposals for energy networks which have the potential to impact upon London Underground infrastructure.

- 8.23 The Council's borough-wide Heat Demand and Heat Source Mapping (2015) identified that new decentralised energy networks are most likely to begin in, and expand out from, areas to the south of Euston Road (Russell Square and Great Ormond Street), areas in the centre of the borough (South Camden and Camley Street), Kentish Town and Kilburn. This is due to the scale and mix of developments in these locations.
- 8.24 Combined Heat and Power (CHP) led decentralised energy networks typically involve a CHP led energy centre supplying heat and electricity to nearby buildings. Cooling can also be incorporated in such systems where there is appropriate demand. Within the context of the energy hierarchy, gas fired networks are considered to sit within stage two, 'Be clean'. However, it is important to note that there are serious air quality implications for the use of CHP plants and biomass boilers. The use of biomass as a renewable energy source will be the Council's least preferred option for the provision of renewable energy and further information on this issue can be found in Policy CC4 Air quality.
- 8.25 New developments are considered to be the most effective catalysts for decentralised energy network growth. The Council will therefore require all new major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network. Developments will be required to follow the steps below, in the order listed, to ensure that energy from an efficient source is used where possible:
- **Connect immediately:** where feasible, development will be required to connect immediately to existing networks;
  - **Connect in immediate future:** where networks do not currently exist, developments will be required to assess feasibility of connecting to identified future decentralised energy network opportunities in the vicinity of the site, having regard to Map 5: Energy Networks on page 257, area specific feasibility studies, energy plans and site allocations. Where shown to be feasible, development proposals must provide on-site infrastructure for connection and agree a timescale for connection where possible;
  - **Provide a site wide low carbon network:** all major developments that cannot immediately connect to an existing or planned network should evaluate the feasibility of a site wide network using low carbon energy sources such as CHP or other low carbon technologies and examine the feasibility of extending the system beyond the site boundary to other sites within a 500m radius, prioritising communally heated Council buildings.
- 8.26 All major developments should incorporate communal heat distribution systems to facilitate a single point of connection to decentralised energy networks unless it can be clearly demonstrated that it is not applicable due to local circumstances. Major developments that do not connect to a network and are located within areas identified (see Map 5: Energy Networks and supplementary planning document Camden Planning Guidance on sustainability) will be required to make a financial contribution towards Council-led decentralised energy feasibility and delivery within these areas. Developers in these areas may also be expected to collaborate with the Council in the production of such studies and install heating infrastructure in accordance with the study conclusions.





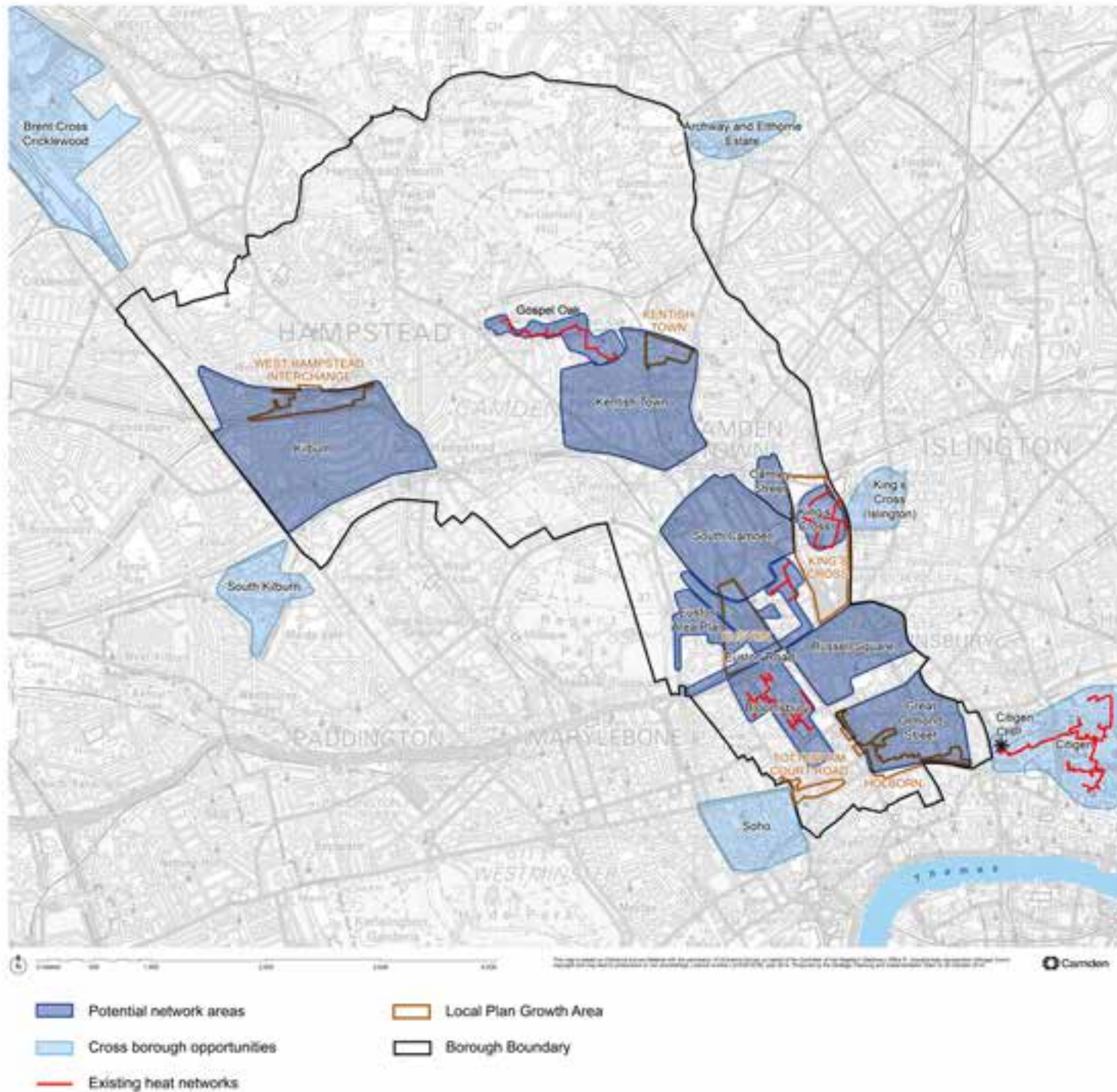
- 8.27 The Council does not support the installation of stand-alone CHP units in small developments where there is neither the potential nor the intention for that development to form part of a wider network. The administrative burden of managing small scale CHP electricity sales, and the low unit price available for small volumes of exported CHP electricity, means it is generally uneconomic for developers to pursue. This can lead to CHP being installed but not operated.

### Monitoring

- 8.28 Energy performance software, used to inform energy statements, is evolving but does have limitations. The installation of monitoring equipment in all major developments will provide important information showing actual energy performance and will aid the Council's and developers' understanding of the effectiveness of measures implemented in the borough. Such data would also inform the Council as to whether policy requirements are being met. Monitoring shall include any renewable or low carbon technology that contributes to meeting London Plan Policy 5.2. A contribution will be sought towards monitoring. The cost of this should be no greater than the cost of metering equipment that is required to be installed through industry standard regulations.



Map 5: Energy Networks



## Adapting to climate change

- 8.30 Climate change adaptation involves changing the way we do things to prepare for the potential effects of climate change. We need to ensure that buildings and people can adapt to changes already evident within the climatic system.
- 8.31 Adapting to a changing climate is identified in Camden's environmental sustainability plan, Green Action for Change (2011-2020). The three key risks which require adaptation measures are flooding, drought and overheating. Specific design measures and 'green infrastructure' such as green roofs, green walls and open spaces can help mitigate some of these risks.
- 8.32 Changes to our climate could also lead to:
- subsidence, due to increased shrinking and expanding of Camden's clay base;
  - poorer air quality;
  - a hotter microclimate;
  - increased summer electricity use due to increased demand for cooling; and
  - threats to the quantity and quality of our water supply.
- 8.33 Such risks impact upon the health and wellbeing of Camden residents, have financial implications and can have impacts upon whether plant and animal species thrive or decline. Ensuring new developments are designed to adapt to these risks should be a key consideration when assessing applications for development in the borough.

### Policy CC2 Adapting to climate change

The Council will require development to be resilient to climate change.

All development should adopt appropriate climate change adaptation measures such as:

- a. the protection of existing green spaces and promoting new appropriate green infrastructure;
- b. not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems;
- c. incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and
- d. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

Any development involving 5 or more residential units or 500 sqm or more of any additional floorspace is required to demonstrate the above in a Sustainability Statement.

#### Sustainable design and construction measures

The Council will promote and measure sustainable design and construction by:

- e. ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;
- f. encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;
- g. encouraging conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings to achieve “excellent” in BREEAM domestic refurbishment; and
- h. expecting non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.

### Climate change adaptation measures

- 8.34 To minimise the risks connected with climate change we will expect the design of developments to consider anticipated changes to the climate. It is understood that some adaptation measures may be challenging for listed buildings and some conservation areas and we would advise developers to engage early with the Council to develop innovative solutions.

#### Green spaces

- 8.35 Camden is fortunate to have Hampstead Heath, Primrose Hill and Regent’s Park which collectively help to temper the urban over-heating in the north of Camden and provide relatively cool space in hot weather. To the south of the Euston Road there is less green space available. Throughout Camden we shall continue to protect our open and green spaces and where possible seek to create additional open spaces. Please see Policy A2 Open space for further information on Camden’s green spaces.
- 8.36 As well as limiting urban over-heating, green spaces help to slow the passage of rainwater to Camden’s drainage network, which in turn reduces the risk of surface water flooding during intense rainfall events. The planting of trees as part of new developments is encouraged but species selection and location will need to be carefully considered to avoid risks of subsidence, drying out the soil or excessive maintenance.

#### Sustainable drainage and biodiversity

- 8.37 To support a sustainable approach to drainage, all development should install green roofs, permeable landscaping, green walls and combination green and blue roofs, where appropriate. Further information on these systems can be found in our supplementary planning document Camden Planning Guidance on sustainability.
- 8.38 As well as playing a vital role in slowing the speed at which rainwater enters the drainage network, green roofs provide valuable habitats which promote biodiversity, cool the local microclimate and can provide visual amenity. Green roof specifications should be tailored to realise the benefits most suitable for the site and should consider appropriate drought resistant planting to ensure that they can survive hot summers with minimal maintenance.

### Urban heat island

- 8.39 The Council will discourage the use of air conditioning and excessive mechanical plant. In addition to increasing the demand for energy, air conditioning and plant equipment expel heat from a building making the local micro-climate hotter. Where the use of this equipment is considered acceptable by the Council, for example where sterile internal air is required, we will expect developments to provide an appropriate level of mitigation towards cooling the local environment. Cooling measures could be passive or active, such as introducing planting in the public realm, green walls and roofs or other measures as recommended in the Mayor's Sustainable construction and design supplementary planning document.
- 8.40 Trees near buildings to mitigate the urban heat effect are best placed to the west, south-west or south of buildings with small leafed species likely to offer the greatest impact. Green spaces and wider green infrastructure should be a minimum of 0.5ha in order to achieve cooling at significant distances beyond site boundaries (Forestry Commission, Air temperature regulation by urban trees and green infrastructure, 2013).

### Cooling

- 8.41 All new developments will be expected to submit a statement demonstrating how the London Plan's 'cooling hierarchy' has informed the building design. Any development that is likely to be at risk of overheating (for example due to large expanses of south or south west facing glazing) will be required to complete dynamic thermal modelling to demonstrate that any risk of overheating has been mitigated.
- 8.42 Active cooling (air conditioning) will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy.
- 8.43 The cooling hierarchy includes:
- Minimise internal heat generation through energy efficient design;
  - Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls;
  - Manage the heat within the building through exposed internal thermal mass and high ceilings;
  - Passive ventilation;
  - Mechanical ventilation; and
  - Active cooling.

### Sustainable design and construction measures

- 8.44 When a building is constructed, the accessibility of its location; its density and mix of uses; its detailed design taking into account the orientation of the site; and the mechanical services and materials chosen can all have a major impact on its energy efficiency. The Council will require all schemes to consider sustainable development principles from the start of the design process and include these in their Design and Access Statement and/or Sustainability

Statement. Developments of five or more dwellings or 500 sqm of any floorspace should address sustainable development principles in an Energy and Sustainability Statement.

- 8.45 In all cases where assessment methods are changed or superseded, the Council will use the equivalent replacement standards.

#### **BREEAM and BREEAM domestic refurbishment**

- 8.46 BREEAM (Building Research Establishment Environmental Assessment Method) is a tool that enables us to assess the environmental sustainability of a development.

- 8.47 BREEAM and BREEAM domestic refurbishment contains the following categories: Energy, Water, Materials, Waste, Surface Water, Management, Transport, Land use, Ecology, Health and Wellbeing, and Pollution. Each category contains credits that can be obtained by implementing a sustainable design or construction measure. We have been successfully applying sub-targets, which we developed in consultation with the Building Research Establishment within the assessment categories of Energy, Water and Materials. The securing of the credits in these categories is considered to have the greatest environmental benefits and more information can be found in our supplementary planning document Camden Planning Guidance on sustainability.

- 8.48 The sustainability of residential development arising from conversions, extensions and changes of use can be assessed through the use of BREEAM domestic refurbishment. We will encourage developments of five or more dwellings or 500 sqm of residential floorspace or above resulting from conversions, extensions and changes of use to achieve an excellent rating in BREEAM domestic refurbishment.

- 8.49 The Council will expect the application of a BREEAM assessment to non-residential developments (including conversions, extensions and changes of use) of 500 sqm or more. We will expect these to achieve a BREEAM rating of excellent and will encourage zero carbon from 2019.

#### **Other assessment measures**

- 8.50 The Home Quality Mark, launched 2015, is one way of demonstrating the standard of a new residential dwelling, which includes measures for low CO<sub>2</sub>, sustainable materials, good air quality and natural daylight. The Council will strongly encourage schemes to use the Home Quality Mark. The use of Passivhaus standard is also encouraged in demonstrating energy efficient design. Further details on energy efficient design and principles and Passivhaus are set out in our supplementary planning document Camden Planning Guidance on sustainability.



## Water and flooding

- 8.51 Our built environment plays a significant role in the way water is consumed, distributed and disposed of. The way water is used in a building and the pollutants it picks up running across a site affect the quality of the water that reaches the combined storm water and sewer system. In addition, the location of a development, and any flood mitigation measures used, can have an impact on local and downstream surface water flooding. Camden is a Lead Local Flood Authority, which means the Council has responsibility for managing flood risk from surface water and groundwater in the borough.
- 8.52 Areas at risk of flooding in Camden are identified in the Council's Surface Water Management Plan and Strategic Flood Risk Assessment. These areas are shown on Map 6: Historic flooding and Local Flood Risk Zones on page 266.
- 8.53 Camden experienced significant flooding in 1975 and 2002 and the probability of such events recurring is likely to increase as a result of climate change. As noted in Policy CC2 Adapting to climate change, flooding and drought are key risks which require mitigation and adaptation measures in the borough. Changes to our climate can also threaten the quantity and quality of our water supply. Such risks impact upon the health and wellbeing of Camden residents.

### Policy CC3 Water and flooding

The Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible.

We will require development to:

- a. incorporate water efficiency measures;
- b. avoid harm to the water environment and improve water quality;
- c. consider the impact of development in areas at risk of flooding (including drainage);
- d. incorporate flood resilient measures in areas prone to flooding;
- e. utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
- f. not locate vulnerable development in flood-prone areas.

Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

The Council will protect the borough's existing drinking water and foul water infrastructure, including the reservoirs at Barrow Hill, Hampstead Heath, Highgate and Kidderpore.

### Water supply and quality

- 8.54 London has lower rainfall than the national average while having a very high population density. This combination of limited water resources and high demand has resulted in London being declared an area of serious water stress

and this trend is likely to be exacerbated by climate change. The Council will protect the borough's existing water infrastructure to ensure there is adequate supply, storage and foul water capability.

- 8.55 Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site. Residential developments will be expected to meet the requirement of 110 litres per person per day (including 5 litres for external water use). Refurbishments and other non-domestic development will be expected to meet BREEAM water efficiency credits. Major developments and high or intense water use developments, such as hotels, hostels and student housing, should include a grey water and rainwater harvesting system. Where such a system is not feasible or practical, developers must demonstrate to the Council's satisfaction that this is the case.
- 8.56 Camden has Groundwater Source Protection Zones (see Map 6: Historic flooding and Local Flood Risk Zones on page 266). The inner zone is located within the south west of Primrose Hill Park and the outer zone covers a section of South Hampstead from Prince Albert Road to Swiss Cottage. These zones are to signal that there are likely to be particular risks posed to the quality or quantity of water obtained, should certain activities take place nearby. These zones should be taken into account when considering the environmental impact of a development.



- 8.57 Water can pick up pollutants running across a site, which in turn enters our combined storm water and sewer system. Developments are required to utilise Sustainable Drainage Systems (SuDS), following the drainage hierarchy (see below), to ensure that development does not harm water quality.

#### **Drainage hierarchy**

1. store rainwater for later use
2. use infiltration techniques, such as porous surfaces in non-clay areas
3. attenuate rainwater in ponds or open water features for gradual release
4. attenuate rainwater by storing in tanks or sealed water features for gradual release
5. discharge rainwater direct to a watercourse
6. discharge rainwater to a surface water sewer/drain
7. discharge rainwater to the combined sewer

#### **Areas at risk of flooding**

- 8.58 The key flood risk to Camden is from surface water flooding. This arises following periods of intense rainfall when the volume and intensity of a rainfall event exceeds the capacity of the drainage system, resulting in localised flooding. Areas considered at risk from flooding are: Local Flood Risk Zones; and previously flooded streets (shown on Map 6: Historic flooding and Local Flood Risk Zones). Reference should also be made to Environment Agency surface water maps.
- 8.59 Thames Water identified that the south east of the borough discharges storm flow into the highly sensitive Counters Creek drainage catchment, where flooding to property already occurs. Changes in land use and rising population in this catchment area has resulted in larger volumes of water entering the system. There are also twelve Local Flood Risk Zones (LFRZs) in Camden. LFRZs are defined as discrete areas of flooding that do not exceed the national criteria for a 'Flood Risk Area' but still affects houses, businesses or infrastructure (refer to Map 6: Historic flooding and Local Flood Risk Zones on page 266).
- 8.60 Camden also has a small risk of groundwater flooding, which takes two principal forms. The most common form of groundwater flooding in Camden is from 'perched' groundwater, water that becomes lodged between the top layer and the impermeable London clay layer. The risk of this type of flooding is difficult to model but has been recorded in parts of the borough, notably Kilburn, Fortune Green and West Hampstead, and will need to be considered and mitigated against in any new development. Aquifer based groundwater flooding is relatively rare in Camden, but it is possible in areas around Hampstead Heath and in the very south of the borough. This occurs when the water table rises due to prolonged heavy rain.
- 8.61 Development can have an impact on the water environment beyond the site where it takes place by altering the flow of water both above and below ground and changing where water is absorbed or rises to the surface. Changing water movements can alter soil conditions in the wider area. All developments should refer to the Council's Strategic Flood Risk Assessment (SFRA) to determine the likely impact the development will make to flood risk.

### Site specific Flood Risk Assessments

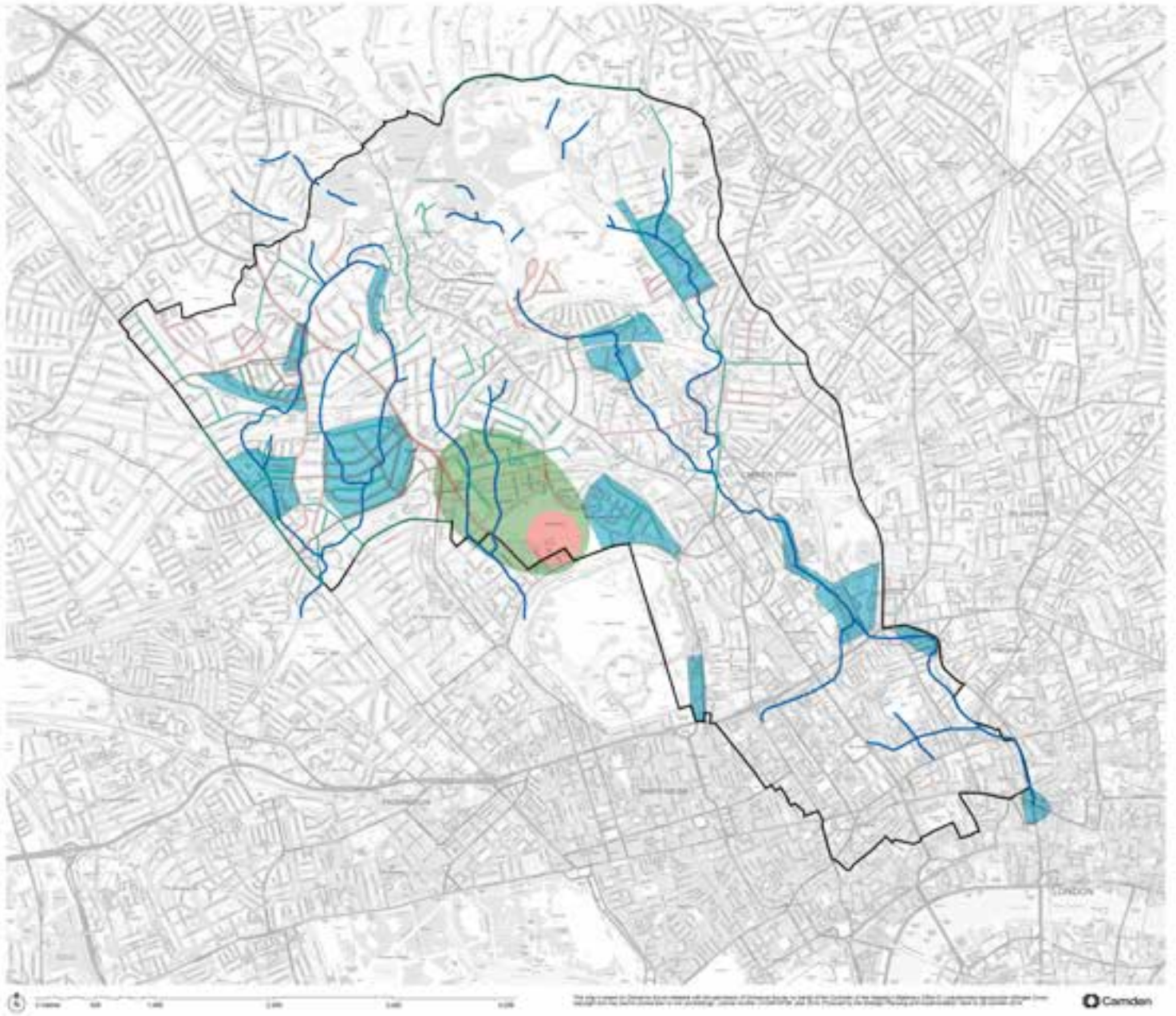
- 8.62 Flood Risk Assessments (FRA) are carried out to identify the main flood risks to a development site, whether a development will increase flood risk, and recommendations for mitigating measures to reduce the impact of flooding at the site and surrounding area.
- 8.63 The Council will require Flood Risk Assessments for:
- all sites of 1 hectare or greater;
  - all major planning applications in areas at high risk to flooding; and
  - all basement development on streets identified as being at flood risk or in an area where historic underground watercourses are known to have been present, or in areas where there is an elevated risk of groundwater flooding.
- 8.64 A Flood Risk Assessment should identify how a development will be designed to cope with flooding and how the risk will be mitigated without increasing the risk elsewhere. Recommendations in the FRA will be secured by planning condition.

### Mitigating flood risk

- 8.65 By decreasing the amount of permeable surfaces into which rainwater can be absorbed and by changing the direction of surface water flows, new development can increase stress on the drainage network and increase risk of flooding to properties downstream which were not previously at risk. Development located within areas at risk of flooding should not place additional pressure on the existing drainage infrastructure.
- 8.66 The Council will require developments to utilise Sustainable Drainage Systems (SuDS), to achieve greenfield run-off rates, unless demonstrated that this is not feasible. Surface water should be managed as close to its source as possible, in line with the drainage hierarchy in the London Plan. Where it is not possible to achieve greenfield run-off rates it should be as close to this as possible (a greenfield run-off rate is one that reflects the natural rate of water run-off from a site before it was developed). Major developments will be required to constrain runoff volumes for a 1 in 100 year, 6 hour rainfall event, where feasible.
- 8.67 A drainage report should be submitted with all major applications, basement developments and other vulnerable development in areas identified at risk of flooding. This should include:
- identification of flood risk;
  - assessment of existing run-off rates;
  - calculation of greenfield run-off rates;
  - identification of measures, in line with the drainage hierarchy, to reduce run-off rates; and
  - calculation of proposed run-off rates.



Map 6: Historic flooding and Local Flood Risk Zones



- Local flood risk zone
- Historic water course
- Flooded street 1975, 2002
- Environment Agency groundwater source protection zone:
  - Inner zone (zone 1)
  - Outer zone (zone 2)
- Borough boundary





- 8.68 Camden's Strategic Flood Risk Assessment includes information as to the suitability of SuDS in the borough and this should be used alongside other local information held by Camden and the Environment Agency. Where appropriate, SuDS measures will be secured by planning condition or by legal agreement. The Environment Agency published in 2016 updated climate change allowances including those for peak rainfall, which should be factored into any flood risk assessments.
- 8.69 Development should also demonstrate how it will mitigate the potential flooding of other properties. When determining the suitability of SuDS, vulnerability and the importance of local ecological resources, such as water quality and biodiversity should be considered.

#### **Vulnerable development**

- 8.70 Basements can affect the ability of the ground to absorb rain when soil is replaced by an impervious structure and can be particularly susceptible to flooding. The Council will not permit basement schemes which include habitable rooms and other sensitive uses for self-contained basement flats and other underground structures in areas prone to flooding (Policy A5 Basements). The Council shall require all new basement developments whether domestic or non-domestic to conduct a Basement Impact Assessment (please see Policy A5 Basements) which considers both groundwater and surface water flooding. A Basement Impact Assessment (BIA) should demonstrate that the impacts of the proposed development are acceptable, or that appropriate mitigation measures will be adopted.

## Regent's Canal

- 8.71 The Regent's Canal (which is a branch of the Grand Union Canal) runs through the centre of the borough. The Canal forms part of London's Blue Ribbon Network, which has its own set of policies within the London Plan. Please refer to Policy A2 Open space for further information on the value of Regent's Canal in Camden.
- 8.72 The quality of the Regents Canal is of 'moderate' status, it is not reaching 'good' as mitigation measures still need to be implemented. The Council will have regard to the Thames River Basin Management Plan which contains the actions needed to tackle the main issues of the water environment.

## Air quality

- 8.73 Improving local air quality, mitigating the impact of development on air quality and reducing exposure to poor air quality in the borough is vital in safeguarding public health and the environment. The focus of Policy CC4 is to mitigate the impact of development on air quality and to ensure exposure to poor air quality is reduced in the borough.
- 8.74 It is recognised that parts of Camden have some of the poorest air quality levels in London and since 2000 the whole of the borough has been declared an Air Quality Management Area (AQMA) for both NO<sub>2</sub> (Nitrogen Dioxide) and PM<sub>10</sub> (Particulate Matter). Camden is also working to assess and address PM<sub>2.5</sub> (the smallest fraction of particulate) because despite Camden meeting EU limit values for PM<sub>2.5</sub>, research suggests that particulates of this size have the worst health impacts. Air pollution is associated with a number of adverse health impacts, and it particularly affects the most vulnerable in society.
- 8.75 A key challenge is to make our local environment better by reducing air pollution. In addition to Policy CC4, this Plan also actively supports the improvement of air quality in Camden by:
- requiring all new development in the borough to be ‘car-free’ (see Policy T2 Parking and car-free development);
  - maintaining and increasing green infrastructure (see Policy A2 Open space);
  - reducing emissions associated with new development (see Policy CC1 Climate change mitigation); and
  - supporting and encouraging sensitive energy efficiency improvements to existing buildings (see Policy CC1 Climate change mitigation).

### Policy CC4 Air quality

The Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council’s Air Quality Action Plan.

Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.

Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in

an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.

- 8.76 The Council's Air Quality Action Plan identifies actions and mitigating measures to be implemented by the Council and partners to reduce NO<sub>2</sub> and PM<sub>10</sub> from the four main emission sources of the borough: road transport; gas boilers; new developments; and small industrial processes. The Air Quality Action Plan takes account of the measures contained within the Mayor's Air Quality Strategy 'Clearing the Air'.
- 8.77 In order to help reduce air pollution and adhere to London planning policy, developments must demonstrate that they comply with Policy 7.14 of the London Plan (to be at least air quality neutral).

### Air Quality Assessments

- 8.78 The Council will require Air Quality Assessments (AQA) where any of the following apply:
- major applications where occupants will be exposed to poor air quality (along a busy road, diesel railway lines or in a generally congested area);
  - development that has potential to significantly change road traffic on a busy road;
  - the development has more than 75 new residences;
  - commercial developments with a floorspace of 2,500 sqm or more;
  - developments that include biomass boilers or CHP (combined heat and power) and connections to existing decentralised energy networks (whereby the increased capacity is not already covered by an existing AQA); and
  - substantial earthworks or demolition.
- 8.79 We will also require a basic AQA for all newly erected buildings/substantial refurbishments and changes of use where occupants will be exposed to poor air quality (due to its location next to a busy road, diesel railway line or in a generally congested area).
- 8.80 Air Quality Assessments must outline the predicted and forecast pollutant concentrations at the proposed development and the planned mitigations. The Air Quality Assessment should also consider wider cumulative impacts on air quality arising from a number of smaller developments.

### Mitigating measures

- 8.81 Where an AQA shows that a development would cause harm to air quality, planning permission will be refused unless mitigation measures are adopted to reduce the impact to acceptable levels. Mitigation measures should be provided on-site, however where this is impractical the AQA should demonstrate that it is possible to include measures in the local area which have equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement where appropriate.
- 8.82 Developments will also be expected to include measures to ensure that the exposure of occupants to air pollution is reduced to within acceptable levels. In addition to mitigation, major developments in these areas will be expected to address local problems of air quality which may include various design solutions

and buffers. Measures that can be taken to reduce exposure to air pollution are contained in our supplementary planning document Camden Planning Guidance on amenity.

### Effect of development on air quality

8.83 A development can affect air quality in three significant ways:

- emissions from construction and demolition;
- emissions from the combustion of fuel for energy within the building; and
- emissions from transport to and from the building.

#### Construction and demolition

8.84 Emissions from construction and demolition can be reduced through the adoption of sustainable design and construction methods (see Policies CC1 and CC2). Any development which involves significant demolition, construction or earthworks will be required to assess the risk of impacts according to Institute of Air Quality Management Dust Guidance and adhere to the Mayor's supplementary planning document (SPD) on 'The control of dust and emissions during construction and demolition'. Mitigation measures appropriate to the risk should be included in the Construction Management Plan. All high risk sites must include real time construction dust monitoring and all medium risk sites to include monitoring where considered necessary, in accordance with the Mayor's SPD.

#### Fuel for energy

8.85 In Central London, one of the most significant sources of air pollution is domestic and commercial boilers, which are a key source of NO<sub>2</sub> (around 40%) and a small source of PM<sub>10</sub>. This can be reduced through energy efficiency and by ensuring new boilers are Ultra Low Nitrogen Oxide (NO<sub>x</sub>) (<40 mg/kWh). There are serious air quality implications for the use of Combined Heat and Power (CHP) Plants and Biomass Boilers. Consequently the use of biomass as a renewable energy source will be the Council's least preferred option for the provision of renewable energy. We will expect developments to focus on energy efficiency and an efficient energy supply. CHP will only be accepted if it is shown to be the most appropriate choice, it must also be of the highest standard in terms of NO<sub>x</sub> emissions and it must adhere to the latest emissions standards contained in the Mayor's Supplementary Planning Guidance 'Sustainable Design and Construction'. An AQA with full dispersion modelling is required for all proposed Biomass and CHP boilers and this must demonstrate that its impact on nearby receptors is minimal.

#### Transport

8.86 Road transport is a significant source of air pollution in London, primarily from vehicle exhaust and tyre and brake wear.

8.87 Vehicles are a major source of both PM<sub>10</sub> and NO<sub>2</sub> in Camden and AQAs will be required when a development will significantly increase traffic volumes, congestion, parking or the number of HGVs in the locality (see Policy C2 Community facilities and Policy A1 Managing the impact of development).



## Waste

- 8.88 The amount of waste we produce is increasing and the traditional ways of dealing with it (for example, exporting it to landfill sites outside London) are becoming increasingly unacceptable, financially and environmentally. Therefore, we need to find better ways of dealing with our waste and taking more responsibility for dealing with it within London. One of the aims of London Plan is to see London manage the equivalent amount of local authority collected waste (LACW) and commercial and industrial (CandI) waste it produces by 2026. This could be achieved by reducing the amount of waste we produce, increasing the reuse and recycling of materials, reducing the proportion of waste exported out from London and finding sites for new waste facilities.
- 8.89 We also face specific challenges in dealing with waste in Camden. For example, the borough's ability to be self-sufficient in waste is limited by its built-up character and the lack of sites on which to build waste management facilities. Also, the nature of Camden's housing stock, with a large proportion of flats and a significant number of homes without gardens, means that some homes have limited space for storing recycling containers and reduced opportunities for composting.
- 8.90 The Council recognises that Camden cannot adequately deal with its waste in isolation. Therefore, it is a member of the North London Waste Authority, which is responsible for the disposal of waste collected in the boroughs of Barnet, Camden, Enfield, Haringey, Hackney, Islington and Waltham Forest and is working in partnership with these authorities in order to prepare a joint North London Waste Plan (NLWP).

### Policy CC5 Waste

The Council will seek to make Camden a low waste borough.

We will:

- a. aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031;
- b. deal with North London's waste by working with our partner boroughs in North London to produce a Waste Plan, which will ensure that sufficient land is allocated to manage the amount of waste apportioned to the area in the London Plan;
- c. safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site; and
- d. make sure that developments include facilities for the storage and collection of waste and recycling.

## Waste production and recycling

- 8.91 The Council is committed to reducing the amount of waste produced in the borough, encouraging recycling and managing collected waste in a sustainable way. It fully supports the objectives of sustainable waste management to move the management of waste up the 'waste hierarchy' of prevention, preparing for reuse, recycling, other recovery, and to only consider disposal as a last resort.
- 8.92 We believe that communities should take more responsibility for their own waste and we will work to meet national and London-wide targets for waste and recycling. The London Plan expects Camden to manage 152,000 tonnes of waste in 2021, and 186,000 tonnes in 2031. However, we are pooling our waste with our partner boroughs in North London and working on joint solutions to the area's waste. The North London boroughs are together expected to deal with a total of 1,211,000 tonnes of waste in 2021, rising to 1,479,000 tonnes in 2031.
- 8.93 Camden will seek to increase recycling/composting in the borough to meet the London Plan target of 50% of household waste recycled by 2020 and 60% by 2031. Recycling in the borough has been increasing and over 30% of household waste was recycled in 2012/13, up from 16% in 2002/3. We have a number of schemes to encourage more recycling, including mini recycling centres, the reuse and recycling centre at Regis Road, and a weekly door-to-door recycling collection service. Green Action for Change, Camden's Environmental Sustainability Plan (2011-2020), aims to reduce the amount of waste we produce in coming years and increase the amount we recycle. It contains our overall objectives for managing Camden's waste and sets out what we are doing to encourage recycling and waste reduction and provide recycling facilities and waste collection services.

## Waste partnership

- 8.94 The North London Waste Authority (NLWA) and the seven boroughs have prepared a Joint Waste Strategy, which plans for managing the waste collected by the boroughs until 2020. This will be used to facilitate the provision of new waste management services, to increase recycling and recovery and divert more waste away from disposal to landfill.
- 8.95 In their role as planning authorities, the boroughs are preparing a joint planning document - the North London Waste Plan (NLWP) - which will form part of borough Local Plans. It will identify appropriate locations, including existing sites, for a range of waste facilities to meet the waste management needs of North London and will aim to ensure that benefits are maximised and the negative aspects minimised. In line with London Plan policy 5.17, the North London Waste Plan will identify sites to deal with the management of local authority collected waste and commercial and industrial waste. In addition, the NLWP will plan for construction, demolition and excavation waste; hazardous waste and agricultural waste. It will also contain some detailed policies to ensure that proposals for waste facilities will be dealt with consistently across the North London area.
- 8.96 Camden currently only has one waste site - the recycling and reuse centre at Regis Road - and will continue to safeguard it for waste use. The change of use or redevelopment of this site will only be permitted if a suitable compensatory

waste site is provided that replaces the facilities and services available at Regis Road. The proposed site will be expected to normally meet the maximum achievable throughput of the Regis Road site (see London Plan policy 5.17).

### **Facilities for storage and collection**

- 8.97 To make sure that residents and businesses can properly store and sort their waste and to make household recycling as easy as possible, the Council will require developments to provide adequate facilities for recycling and the storage and disposal of waste. Facilities for home composting will be encouraged in appropriate development schemes. We will also seek to secure the reuse of construction waste on development sites to reduce resource use and the need to transport materials. Our supplementary planning document Camden Planning Guidance on design contains further information on the Council's expectations for on-site facilities for waste and recycling and on construction waste.

### **Waste Management Plan**

- 8.98 To ensure an integrated approach to waste management and the highest possible reuse and recycling rates, the Council will encourage the submission of a site waste management plan prior to construction. For further details please refer to our supplementary planning document Camden Planning Guidance on sustainability

# 9. Town centres and shops

## Quantity and location of retail development

- 9.1 Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole. They are places of employment, shopping, leisure, and services.
- 9.2 Traditional high street style centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out of centre retail development. However Camden's centres also have strengths in terms of their location, accessibility by public transport, walking and cycling, character and offer (including many independent and specialist shops).
- 9.3 In line with the National Planning Policy Framework, the Council will take a sequential approach when assessing proposals for new town centre uses ensuring that such development takes place in appropriate locations, having regard to the distribution of future retail growth and the hierarchy of centres established this policy.
- 9.4 The development of new shops or other town centre uses, particularly when they are large in scale, can have an impact on other centres. In line with government guidance in the National Planning Policy Framework, the Council will seek to protect the vibrancy and vitality of its centres by assessing the impact of proposed town centre uses in Camden's centres.
- 9.5 Further guidance on assessing the impact of retail development and Retail Impact Assessments is set out in the National Planning Policy Framework and the Planning Practice Guidance.

### Camden Centres

#### Town Centres

- Camden Town;
- Finchley Road / Swiss Cottage;
- Hampstead;
- Kentish Town;
- Kilburn High Road;
- West Hampstead.

#### Central London Frontages

- High Holborn / Kingsway;
- King's Cross;
- Tottenham Court Road / Charing Cross Road / New Oxford Street.



## Neighbourhood Centres

Camden has 37 Neighbourhood Centres, which are identified in supplementary planning document Camden Planning Guidance on town centres and retail.

## Specialist Shopping Areas

- Covent Garden;
- Fitzrovia and south-west Bloomsbury;
- Hatton Garden;
- Museum Street; and
- Denmark Street.

## Growth areas

- Euston;
- Holborn;
- Kentish Town;
- King's Cross / St Pancras;
- Tottenham Court Road; and
- West Hampstead Interchange.

The boundaries of the centres are set out on the Local Plan Policies Map.

The borough's growth areas and town centres are shown on Map 7: Camden's centres on page 280.

## Policy TC1 Quantity and location of retail development

The Council will focus new shopping and related uses in Camden's designated growth areas and existing centres, having regard to the level of capacity available in these locations.

### Distribution of retail across Camden

The Council will promote the following distribution of retail and other town centre uses across the borough:

#### Growth Areas:

- significant development in the King's Cross / St Pancras Growth Area, with approximately 30,000 sqm net additional retail (A1 to A5 use classes) floorspace anticipated;
- significant development in the Euston Growth Area, with approximately 16,450 sqm of net additional retail (A1 to A5 use classes) floorspace anticipated;
- additional provision as part of redevelopment schemes in the growth areas of Tottenham Court Road, Holborn and West Hampstead Interchange; and
- limited additional provision as part of redevelopment of the Kentish Town Growth Area.

**Town Centres:**

- significant additional provision in the Camden Town Town Centre; and
- additional provision in the other town centres.

**Central London Frontages:**

- significant provision in the Tottenham Court Road Central London Frontage; and
- additional provision in the other central London frontages.

**Neighbourhood centres, specialist shopping areas, and small shops outside of centres:**

- appropriate provision in Neighbourhood Centres;
- appropriate provision in Camden's Specialist Shopping Areas; and
- limited provision of small shops outside centres to meet local needs.

This retail floorspace is expected to be supported by a range of other town centre uses, including food, drink and entertainment uses.

**Sequential Approach**

The Council will apply a sequential approach to retail and other town centre uses outside of the areas listed above to support Camden's network of centres. Retail and other town centre uses should be located in designated centres. Only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations.

The Council will require a retail impact assessment for large retail development proposals (of 2,500 sqm or more) that are not in accordance with the above approach and:

- would be in an edge of centre or out of centre location; or
- would be in an existing centre and have the potential to have a harmful impact on other centres.

**New retail provision**

- 9.6 The growth area of King's Cross will provide the major focus for new shop provision in Camden. The King's Cross Central redevelopment will include shops, services and facilities of a scale similar to a town centre to meet the needs of the large numbers of people who will be living, working, or visiting the area. Planning permission has been granted for 45,000 sqm of retail, food and drink floorspace (in A use classes). This will be spread throughout the site and will open in phases. Approximately 30,000 sqm of this is yet to be built.
- 9.7 The Camden Retail and Town Centre Study 2013 indicates a need for around 30,000 sqm of new retail floorspace in the borough by 2031, in addition to that to be provided at King's Cross and St Pancras.
- 9.8 There is opportunity to deliver a significant amount of additional retail floorspace as part of the redevelopment of Euston Station. The Euston Area Plan anticipates that around 20,000 sqm of class A1 to A5 uses could be provided at



Euston both around and within the station. This figure comprises 16,450 sqm of net growth and reversion of around 3,550 sqm of retail to meet demand from current passenger numbers. Approximately 8,000 sqm of this could be in A1 retail use.

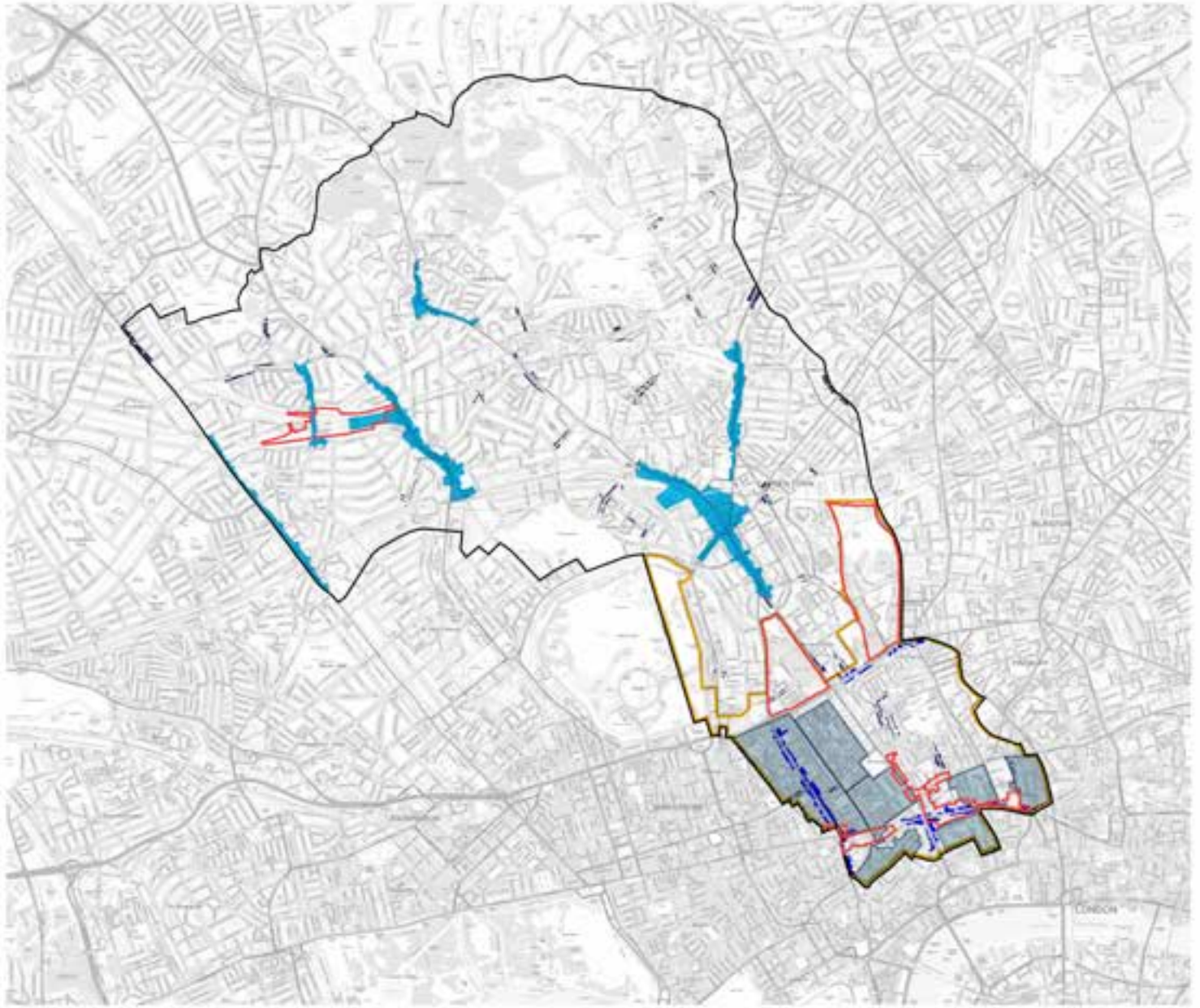
- 9.9 The precise quantum and type of retail to be provided will be subject to detailed site specific assessments and an assessment of any impacts on other centres.

### Sequential approach

- 9.10 The sequential approach applies to sites outside of designated centres. The Local Plan does not require that retail development seeks sites within the designated centres in any hierarchical order, provided the development meets the policy objectives for each centre as described in the policy. For example, there is no need for retail development to be directed to Growth Areas before Town Centres, or to Town Centres before Central London Frontages.
- 9.11 For the Central London Specialist Shopping Areas of Covent Garden, Fitzrovia and south-west Bloomsbury, Hatton Garden, and Museum Street, sites should be sought within the designated frontages, not the wider boundary. Proposals for new retail development within these areas that are not within the designated frontage will be considered to be in an out of centre location.



Map 7: Camden's centres



- |  |   |  |
|--|---|--|
|  Growth Area             |  Neighbourhood Centre      |  Borough Boundary |
|  Town Centre             |  Central London Local Area |  |
|  Central London Frontage |  Central Activity Zone     |  |

## Camden's centres and other shopping areas

9.12 The Council will ensure that development in its centres is appropriate to the character and role of the centre in which it is located and does not cause harm to neighbours, the local area, or other centres.

9.13 Camden's centres and designated shopping frontages are set out in the Local Plan Policies Map.

### **Protected frontages**

9.14 The Council has identified key frontages within Camden's centres to which further policy and guidance apply. These protected frontages are identified as either primary or secondary frontages and are shown on the Local Plan Policies Map.

### **Permitted development rights**

9.15 The Council seeks to protect the vitality and viability of its centres through application of the retail policies and through the control of shopping and other town centre uses on protected frontages. Under permitted development rights planning permission is not required for many changes of use between retail and other town centre uses, meaning the Council cannot apply our planning policies for town centres in these instances.

9.16 The government has introduced a number of new permitted development rights that affect town centres. These include the new rights to:

- change from A1 retail or A2 financial services to A3 restaurants and cafes (subject to prior approval);
- change from A1 retail to A2 financial services; and
- change from A1 retail or A2 financial services to D2 assembly and leisure uses (subject to prior approval).

9.17 The above permitted development rights that are subject to prior approval from the Council are subject to the change of use not having unacceptable effects on noise, odour, waste, transport and highways and if located in a key shopping area the sustainability of that shopping area.



## Policy TC2 Camden's centres and other shopping areas

The Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors.

We will:

- a. seek to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located;
- b. provide for and maintain, a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice;
- c. make sure that food, drink, entertainment and other town centre uses do not have a harmful impact on residents and the local area and focusing such uses in King's Cross and Euston Growth areas, Central London Frontages, and Town Centres (Refer to Policy TC4 Town centre uses);
- d. support and protect Camden's Neighbourhood Centres, markets and areas of specialist shopping, local shops; and
- e. pursue the individual planning objectives for each centre, as set out in supplementary planning document Camden Planning Guidance on town centres and retail, and through the delivery of environmental, design, transport and public safety measures.

The Council has designated primary and secondary frontages in its centres, which are shown on the Local Plan Policies Map. We will:

- f. protect the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre; and
- g. protect the secondary frontages as locations for shops (A1) together with a broader range of other town centre uses to create centres with a range of shops, services, and food, drink and entertainment uses which support the viability and vitality of the centre.

The Council's expectations for the mix and balance of uses within frontages for each designated centre are set out in Appendix 4.

### Housing above and below shops

The Council supports the development of housing within centres and Central London including above and below shops where this does not prejudice the town centre function and particularly the ability of the ground floor to be used for town centre uses.

### Housing in protected frontages

In order to protect the retail and town centre function of our centres the Council will only permit conversion of retail and other town centre uses to residential use on the protected frontages where it does not harm the role and character of the centre, including maintaining the supply of shop premises in centres across the borough.

### **Neighbourhood Centres**

The Council will seek to retain convenience shopping for local residents in Camden's Neighbourhood Centres and will ensure that development in them does not harm the function, character or success of that centre.

### **Design of new retail spaces**

New retail spaces should be of high quality, provide generous storey heights and incorporate room for signage.

### **Protecting and enhancing the role and character of Camden's centres**

9.18

The Council will protect and enhance the role and character of each of Camden's centres by assessing proposals against this policy and the centre specific guidance set out in Appendix 4 and the supplementary planning document Camden Planning Guidance on town centres and retail. Appendix 4 sets out the mix of uses that the Council expects on primary and secondary frontages, including:

- the minimum proportions of shops (A1 use); and
- the maximum proportions of food, drink and entertainment uses (A3, A4, A5 uses).

### **Housing above and below shops**

9.19

The Council supports development of housing within centres where they do not cause harm to the vitality and viability of these centres, for example by limiting the use of the premises at the ground floor for retail or other town centre uses. In accordance with Policy A4 Noise and vibration the Council will not permit development of housing in locations with high levels of noise unless appropriate attenuation measures are provided. With regard to housing at basement or lower ground floor level, habitable rooms will not be permitted in areas at risk of flooding (refer to Policy A5 Basements). The Council will also take into consideration the centre specific objectives set out in Camden Planning Guidance.

### **Housing in protected frontages**

9.20

Due to high demand for housing and high housing prices in Camden shop units across the borough and particularly those in the Neighbourhood Centres face pressure for conversion to residential use. Shop premises that are converted to homes are likely to stay in residential use even if local market forces swing back in favour of retail uses, whereas changes of use between town centre uses are more flexible over the longer term. The Camden Retail Study anticipates demand for additional retail floorspace in designated centres throughout the Plan period. Camden seeks to protect the role and character of the designated centres. The most significant way we can protect the function of centres is by ensuring that sufficient ground floor premises remain in retail or other town centre uses.

### Neighbourhood Centres

- 9.21 Camden has 37 neighbourhood centres which cater for the day to day shopping and service needs of their local populations. The neighbourhood centres are spread across the borough and vary in size and in role. They contain a range of uses including shops, food and drink uses, doctor and dentist surgeries and financial and professional services and often have housing on upper floors. Housing is the Council's preferred use above ground floor level in neighbourhood centres and we will promote the residential use of vacant or underused floors.
- 9.22 Commercial and community uses are considered acceptable uses of upper floors provided they do not cause harm to the amenity of existing residents or introduce activity that would prejudice future residential use on other levels or in neighbouring properties.
- 9.23 The Council will seek to retain a strong element of convenience shopping for local residents in Camden's neighbourhood centres and ensure that any development in them does not harm the function, character or success of that centre. We will take into account the individual character of the centre when assessing development proposals but, as a guide, we will resist schemes that would result in less than half of ground floor premises in a neighbourhood centre from being in retail use or in more than three consecutive premises being in non-retail use. We will also take into account any history of vacancy in shop units and the prospect of achieving an alternative occupier for vacant premises. Applications for food, drink and entertainment uses will be carefully assessed to minimise the impact on local residents and the local area.



**Design of new retail spaces**

9.24

All units for retail and other town centre uses on protected frontages in Camden's centres and shopping areas should be designed to provide high quality retail space. In particular shop units should provide generous storey heights and space for signage. For most locations the Council will expect a minimum storey height of approximately 4.5m, which provides approximately 3.5m clear internal height. In some key shopping areas even higher storey heights may be necessary to provide spaces that are suitable for larger shops. Such locations include the Central London Frontages and in particular the primary frontages. In these locations the Council may require storey heights of 6m, providing approximately 5m clear internal height.

## Shops outside of centres

- 9.25 Camden has many individual shops, cafés and small shopping and service parades, complementing the role of larger town and neighbourhood centres. These provide for the day to day needs of the local population, workers and visitors and help provide locally accessible facilities for people with mobility difficulties. They also play an important social role in the surrounding community, as well as contributing to the character and identity of the local area.

### **Policy TC3 Shops outside of centres**

The Council will seek to protect shops outside centres.

The Council will only grant planning permission for loss of a shop outside designated centres provided:

- a. alternative provision is available within 5-10 minutes' walking distance;
- b. there is clear evidence that the current use is not viable; and
- c. within the Central London Area, the development positively contributes to local character, function, viability and amenity.

- 9.26 The Council seeks to retain local shops outside centres where possible, including those on small shopping parades. Therefore, we will resist the loss of shops (Use Class A1) unless there is alternative provision within 5-10 minutes walk (approximately 400-800 metres), depending on the scale of provision. We will also take into account the viability of the premises for the existing use, in particular any history of vacancy in a shop unit and the prospect of achieving an alternative occupier. However, we recognise that, as the number of people shopping locally has declined, it is unlikely that all shops outside centres will continue to find an occupier.
- 9.27 Within Camden's Central London area, there is significant competition between competing land uses. This means that additional protection is needed to prevent the widespread loss of A1 retail uses outside centres, in order to ensure that local shops are available for local residents, workers and visitors. Therefore, the Council will only grant permission for the loss of shops outside centres in Central London where it considers that the replacement use will also contribute positively to the local area. Appropriate alternative uses are considered to be housing and uses providing essential services for residents, businesses, workers and visitors such as professional and financial services, community facilities and launderettes.



## Town centre uses

9.28 This section of the plan sets out the Council's policies on the mix and balance of uses with Camden's centres.

### Food drink and entertainment uses

9.29 Camden's image as a dynamic and attractive place is in part due to the number and quality of restaurants, bars and entertainment venues in the borough, with Camden Town and Covent Garden having particular concentrations of such premises. These areas play an important part in the night time economy of Camden and of London, socially, economically and in terms of job provision. Covent Garden, for example, is identified in the London Plan as part of a strategic cultural area. However, night time activity can also lead to problems such as antisocial behaviour, crime and fear of crime, noise, congestion and disturbance.

9.30 Conflicts can arise as, due to the borough's densely developed, mixed use nature, much night-time activity occurs close to places where people live. In addition, large numbers of such uses can change the character of the area in which they are located and reduce its range of shops or the quality of the shopping environment. Conflicts can be made worse where a particular location becomes a focus for late night activity.

9.31 Eating, drinking and other leisure uses provide a key role in the attractiveness of Camden's centres. However, food, drink and entertainment uses can affect the overall viability and vitality of a centre by eroding the retail offer and can have an impact on amenity through noise and other impacts. In order to protect the primarily retail role of core frontages, the preferred location of food, drink and entertainment uses is secondary frontages.

### Other town centre uses

9.32 Town centre uses include:

- shops and markets (use class A1);
- financial and professional services (A2);
- cafes and restaurants (A3);
- drinking establishments (A4);
- hot food takeaways (A5);
- offices (B1a);
- hotels (C1);
- community uses (D1), including neighbourhood police facilities;
- leisure uses (D2);
- theatres (sui generis);
- betting shops (sui generis);
- a number of other uses not in any use class (see Other town centre uses below).

9.33 Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling

centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

- 9.34 This policy will be applied to proposals for these uses, whether located inside or outside of a centre.

### **Policy TC4 Town centre uses**

The Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.

We will consider:

- a. the effect of development on shopping provision and the character of the centre in which it is located;
- b. the cumulative impact of food, drink and entertainment uses, taking into account the number and distribution of existing uses and non-implemented planning permissions and any record of harm caused by such uses;
- c. the Council's expectations for the mix and balance of uses within frontages for each centre are set out in Appendix 4;
- d. the individual planning objectives for each centre, as set out in the supplementary planning document Camden Planning Guidance on town centres and retail;
- e. impacts on small and independent shops and impacts on markets;
- f. the health impacts of development;
- g. the impact of the development on nearby residential uses and amenity and any prejudice to future residential development;
- h. parking, stopping and servicing and the effect of the development on ease of movement on the footpath;
- i. noise and vibration generated either inside or outside of the site;
- j. fumes likely to be generated and the potential for effective and unobtrusive ventilation; and
- k. the potential for crime and antisocial behaviour, including littering.

To manage potential harm to amenity or the local area, we will, in appropriate cases, use planning conditions and obligations to address the following issues:

- l. hours of operation;
- m. noise/vibration, fumes and the siting of plant and machinery;
- n. the storage and disposal of refuse and customer litter;
- o. tables and chairs outside of premises;
- p. community safety;
- q. the expansion of the customer area into ancillary areas such as basements;
- r. the ability to change the use of premises from one food and drink use or one entertainment use to another (within Use Classes A3, A4, A5 and D2); and

- s. the use of local management agreements to ensure that the vicinity of premises are managed responsibly to minimise impact on the surrounding area.

Contributions to schemes to manage the off-site effects of a development, including for town centre management, will be sought in appropriate cases.

- 9.35 New shops, services, food, drink and entertainment uses can add to the vitality and vibrancy of Camden's centres and local areas. However, they can also have other impacts such as diverting trade and displacing existing town centre functions. As a result, the Council will seek to guide such uses to locations where their impact can be minimised. When assessing proposals for these uses, the Council will seek to protect the character and function of our centres. The Council will prevent any reduction in vitality and viability of the centres by requiring sequential assessments and impact assessments where appropriate (in accordance with the National Planning Policy Framework) and through implementing this policy.
- 9.36 The Council will not grant planning permission for development that it considers would cause harm to the character, amenity, function, vitality and viability of a centre or local area. We consider that harm is caused when an impact is at an unacceptable level, in terms of:
- trade and turnover;
  - vitality and viability;
  - the character, quality and attractiveness of a centre;
  - levels of vacancy;
  - crime and antisocial behaviour;
  - the range of services provided; and
  - a centre's character and role in the social and economic life of the local community.
- 9.37 We will consider the cumulative impact of additional shopping floorspace (whether in a centre or not) on the viability of other centres and the cumulative impact of non-shopping uses on the character of the area. The Council will consider cross boundary impacts of shopping provision, both how provision in Camden affects neighbouring boroughs and how provision in neighbouring boroughs affects Camden.
- 9.38 The supplementary planning document Camden Planning Guidance on town centres and retail provides detailed guidance on how we will treat planning applications for shops, food, drink and entertainment uses in particular centres, taking into account their specific circumstances. Camden Planning Guidance on town centres and retail also provides information on when we consider that concentrations of food, drink and entertainment uses, and reductions in the proportion of premises in retail use, would be likely to cause harm to the character, function, vitality and viability of a centre. We will take these and any other relevant supplementary guidance into account when we assess applications in these locations. We will also take into account any history of vacancy in shop units and the prospect of achieving an alternative occupier for vacant premises when considering proposals that involve the loss of retail premises.



### Food, drink and entertainment uses

- 9.39 Within each of Camden's centres, the Council will seek to prevent concentrations of uses that would harm an area's attractiveness to shoppers or its residential amenity. The Council wishes to see a wide range of entertainment uses within its centres, not just those that primarily involve drinking and will encourage suitable uses that contribute towards this.
- 9.40 Where food, drink and entertainment uses are permitted, they will need to be managed to protect the amenity of residents. To ensure such uses do not harm amenity or the character of an area, either individually or cumulatively, we will consider applying controls on:
- hours of operation;
  - refuse and litter;
  - noise/vibration;
  - fumes;
  - customer area;
  - local management issues; and
  - changes of use.
- 9.41 Where appropriate, we will use planning conditions or obligations to ensure that any remaining impact is controlled. Policy A1 Managing the impact of development sets out further measures to manage the impact of development on amenity.
- 9.42 The Council will seek to ensure that community safety issues associated with proposals are fully addressed. As well as appropriate design measures, the Council will seek financial contributions towards management arrangements, including street wardens, CCTV, town centre management and other community safety schemes through the use of planning conditions and obligations, where

appropriate. Camden's Statement of Licensing Policy sets out the Council's approach to licensing and the expectations that the Council and the Metropolitan Police have for those involved in licensed activities.

- 9.43 The supplementary planning document Camden Planning Guidance on town centres and retail provides further advice on the impact of food, drink and entertainment uses and provides detailed guidance on how we will consider applications for such uses in each centre.

#### **Other town centre uses**

- 9.44 A number of uses commonly found in centres (and smaller shopping parades) are not included in the A1, A2, A3, A4, A5, B1a, D1 or D2 Use Classes. These include amusement arcades, launderettes, saunas and massage parlours, car showrooms and minicab offices. While centres are generally the most appropriate location for these uses, the Council will carefully consider their potential impact when assessing planning applications to make sure that they do not harm the centre or the amenity of neighbours.
- 9.45 Particular issues that may arise include emissions and noise (e.g. from launderettes), highway and traffic problems (e.g. from minicab offices and car showrooms) and community safety and the fear of crime (e.g. from amusement arcades, betting shops, massage parlours and saunas, particularly where there are concentrations of such uses). Amusement arcades, massage parlours and saunas are unlikely to be considered acceptable in the busiest parts of centres or near to housing, schools, places of worship, hospitals or hotels.

#### **Health impacts**

- 9.46 In line with the National Planning Policy Framework the Council believes that the planning system can play an important role in facilitating healthy communities. One issue of particular importance in the borough is childhood obesity. The Council seeks to tackle this issue and encourage healthy eating habits. The Council is undertaking a range of programmes aimed at improving the food environment in the borough. While the causes of obesity are complex there is evidence to support that energy dense fast food is one of a number of contributing factors to obesity. The Council will therefore consider the health impacts of the development of new hot food take aways in the borough.

#### **Betting shops, payday loan stores and pawnbrokers**

- 9.47 The number of betting shops, payday loan stores and pawnbrokers has increased in Camden. The Council considers that a proliferation of these uses could damage the character, vitality and viability of town centres. The Council will therefore monitor the number and impact of betting shops, payday loan stores, and pawnbrokers over the plan period and consider whether evidence shows there is a need to introduce limits on such uses in the future.



## Small and independent shops

9.48 Small shops, often run by independent traders and providing specialist shopping, help to sustain the diversity, vibrancy and character of our centres and smaller shopping areas and provide suitable premises for local businesses. As the retail market changes there is a trend towards fewer larger shops. Many residents have expressed support for measures to encourage small shops and initiatives to encourage and promote retail diversity and entrepreneurialism in the borough.

9.49 The Council aims to provide an adequate supply of retail floorspace with a range of small and large units in town centres to meet the needs of different types of businesses. However, the Council's powers to help protect and promote small and independent shops are limited. For example, in most cases planning permission is not required to prevent adjacent shops being combined into larger premises.

### Policy TC5 Small and independent shops

The Council will promote the provision of small shop premises suitable for small and independent businesses.

We will:

- a. expect large retail developments to include a proportion of smaller units;
- b. attach conditions to planning permissions for retail developments to remove their ability to combine units into larger premises, where appropriate; and
- c. encourage the occupation of shops by independent businesses and the provision of affordable premises.

9.50 The Council will resist the loss of shop premises in our centres where we consider that this would harm the character, function, viability and vibrancy of the area, however the Council cannot influence the occupier of individual premises or the type of goods and services they provide.

### Provision of small shops as part of new developments

9.51 The Council will support and encourage the provision of small shop units as part of retail developments and will seek provision of small shop premises suitable for small and independent businesses in large retail developments, typically those over 1,000 sqm. As a guide, small units are considered to be those that are less than 100 sqm of gross floorspace, although we will take into account the character and size of shops in the local area and the function of centres when assessing the appropriate scale of new premises.

9.52 The Council recognise that provision of small shop units may not be appropriate in every large retail development, therefore in seeking premises for small and independent shop premises the Council will consider the character and



function of the centre, having regard to the centre specific profiles set out in the supplementary planning document Camden Planning Guidance on town centres and retail.

9.53

In addition to the above, we will encourage developers and owners to seek independent occupiers for small units, where possible and provide premises at affordable rents to encourage small businesses. This will be achieved through the use of planning obligations. We will work with developers to assess how such provisions can be taken forward as part of new developments. 'Independent occupiers' will be broadly considered to be businesses with no more than five stores. Affordable rents are considered to be those significantly lower than the market rate and would normally be applied to accommodation for smaller, independent businesses.

## Markets

- 9.54 Camden is well served by markets, ranging from street markets such as Inverness Street, Chalton Street, Leather Lane and Queens Crescent to the world famous Camden Town markets (e.g. the Stables and Camden Lock markets). Markets add greatly to the variety, interest and attraction of shopping in the borough and are a source of local employment, often providing more flexible and casual work opportunities. Street markets can be an important source of fresh food, often grown more locally than food from supermarkets. They can also help to meet the specialist food needs of ethnic communities; black and minority ethnic groups tend to make significantly more use of local markets than the general population. It is important that markets are carefully managed to prevent any potential negative impacts such as congestion and litter.

### Policy TC6 Markets

The Council will promote and protect markets in Camden.

We will:

- a. resist the permanent loss of market uses unless comparable replacement provision is made or there is no demand for continued market use;
- b. take into account the character of the existing market when assessing proposals for the refurbishment and redevelopment of markets;
- c. support new markets that will not cause individual or cumulative harm to the local area.

When assessing planning applications for new markets, the Council will consider:

- d. their effect on local residents and environmental conditions;
- e. their impact on transport and pedestrian movement, including the effect on access and circulation, highways, parking and servicing;
- f. their effect on local centres and shopping provision;
- g. the storage and disposal of litter and refuse;
- h. community safety and noise; and
- i. toilet provision.

- 9.55 The Council will protect markets in the borough by resisting their permanent loss unless alternative, comparable market provision is made nearby or it is demonstrated to the Council's satisfaction that the level of demand means that continued market use is no longer economically viable. Where markets are temporarily closed for extended periods, for example to enable priority redevelopment proposals to proceed, comparable temporary provision nearby will be strongly encouraged.
- 9.56 The character of a market depends on many factors including the type, range and quality of goods sold, the size of stalls and pitches and its environmental



quality. Changes to markets can affect their character and consequently the character and attraction of the local area or centre. When assessing proposals for the refurbishment and/or redevelopment of a market, we will take into account its existing character and its importance to the character, vitality and viability of the centre or area in which it is located. We will expect proposals to consider and, where appropriate, reflect this character.

- 9.57 Alongside their benefits, markets can, when poorly designed or managed, cause harm to surrounding areas, for example in terms of congestion on footpaths and roads, litter, refuse storage and noise. Proposals for markets should therefore include provision for careful management, design out opportunities for crime and, where appropriate, contribute towards environmental and street improvements and initiatives such as improving areas for parking and servicing. We will use conditions and/or legal agreements when granting planning permission to ensure the operation of markets do not have harmful impacts and require detailed layout plans to be submitted as part of planning applications for market uses to allow us to consider whether these matters have been properly addressed.





# 10. Transport

## Transport

- 10.1 With Camden's population forecast set to grow by nearly 2,000 per year until 2031, our challenge is to ensure that growth is supported by healthy and sustainable transport choices.
- 10.2 Between 2006 and 2014, trips by car in Camden reduced by 31%, whilst total motor vehicle trips reduced by 27%. Through policies within this section we will build upon this by prioritising sustainable transport such as walking, cycling and public transport and seek to minimise the use of motor vehicles to transport both people and freight. Sustainable transport supports the primary aims and objectives of both the Camden Transport Strategy 2011 and the Camden Plan.

### Health and wellbeing

- 10.3 Transport choices can have huge impacts upon public health. It is estimated that at least 30% of Camden's population do not engage in any physical activity. Lack of activity however has implications for obesity, heart disease, stroke, cancer, Type 2 Diabetes and physical activity. Sustainable transport choices and 'active travel' (travel requiring a person to exercise - such as walking and cycling) in particular are likely to be the main ways that Londoners meet their physical activity needs. The UK Faculty of Public Health states that active travel is the only viable option for significantly increasing physical activity levels across London's whole population (Built Environment & Physical Activity - A Position Statement, The Faculty of Public Health, 2013).

### Air quality

- 10.4 Air pollution is a major environmental risk to health and the Council has a legal responsibility to reduce all pollutants. Despite the reductions in the majority of pollutants, levels of particulate matter (PM10) and Nitrogen Dioxide (NO2) which occur mainly through exhaust emissions, brake and tyre wear continue to exceed the national air quality standards and objectives in some areas of London. Camden has failed the Government's air quality objectives since 2000, and has been declared an Air Quality Management Area (AQMA). Improving the borough's air quality is therefore an urgent issue and reducing the use of motor vehicles will significantly help in achieving this goal.

### Sustainable communities

- 10.5 One of the key aims of the Camden Plan is to enable communities across Camden to become more sustainable so that they can do more to help themselves and each other. Creating safe attractive, neighbourhoods which promote walking and reduce the dominance of motor vehicles in particular have been found to be associated with increased social interactions and a sense of community. It can also help to create a sense of place and give an area identity.
- 10.6 Access to jobs, training, education, support services, shopping, friends and relatives, leisure and participation in community life is dependent on people's ability to move around. Promoting the use of sustainable transport which is more

affordable and more easily accessible therefore provides an alternative to car use and ensures that people unable to use or afford cars are not excluded or isolated.

### **Transport impacts**

- 10.7 The Council will consider the impacts of movements to, from and within a site, including links to existing transport networks via transport assessments, travel plans, delivery and servicing management plans and construction management plans. The application of these documents is covered within Policy A1 Managing the impact of development.

## Prioritising walking, cycling and public transport

- 10.8 To promote sustainable transport choices, development should prioritise the needs of pedestrians and cyclists and ensure that sustainable transport will be the primary means of travel to and from the site.
- 10.9 Walking is a zero carbon means of transport and provides significant benefits in terms of promoting healthy lifestyles and helping to create more vibrant streets and public spaces. Between 2006-2014, travel by bicycle increased by 82%. The Council therefore seeks to build on this by improving cycling facilities, routes and creating the conditions that will encourage further take up of cycling. Contributions may also be sought to improve Camden's bus network where necessary.

### **Policy T1 Prioritising walking, cycling and public transport**

The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

#### **Walking**

In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments:

- a. improve the pedestrian environment by supporting high quality public realm improvement works;
- b. make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;
- c. are easy and safe to walk through ('permeable');
- d. are adequately lit;
- e. provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and
- f. contribute towards bridges and water crossings where appropriate.

#### **Cycling**

In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:

- g. provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and;
- h. provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning

document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;

- i. makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;
- j. is easy and safe to cycle through ('permeable'); and
- k. contribute towards bridges and water crossings suitable for cycle use where appropriate.

### **Public Transport**

In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.

Where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

### **Walking**

- 10.10 Policy D1 Design and our supplementary planning documents Camden Planning Guidance on design and Camden Planning Guidance on transport set out the Council's approach to providing attractive streets and spaces. Public realm improvements will primarily be delivered by the Council using our own funding and, where appropriate, developer contributions and funding from Transport for London. The Council will continue to work with Transport for London and neighbouring London boroughs to deliver improved pedestrian accessibility and way finding within Camden and into neighbouring boroughs.

### **Cycling**

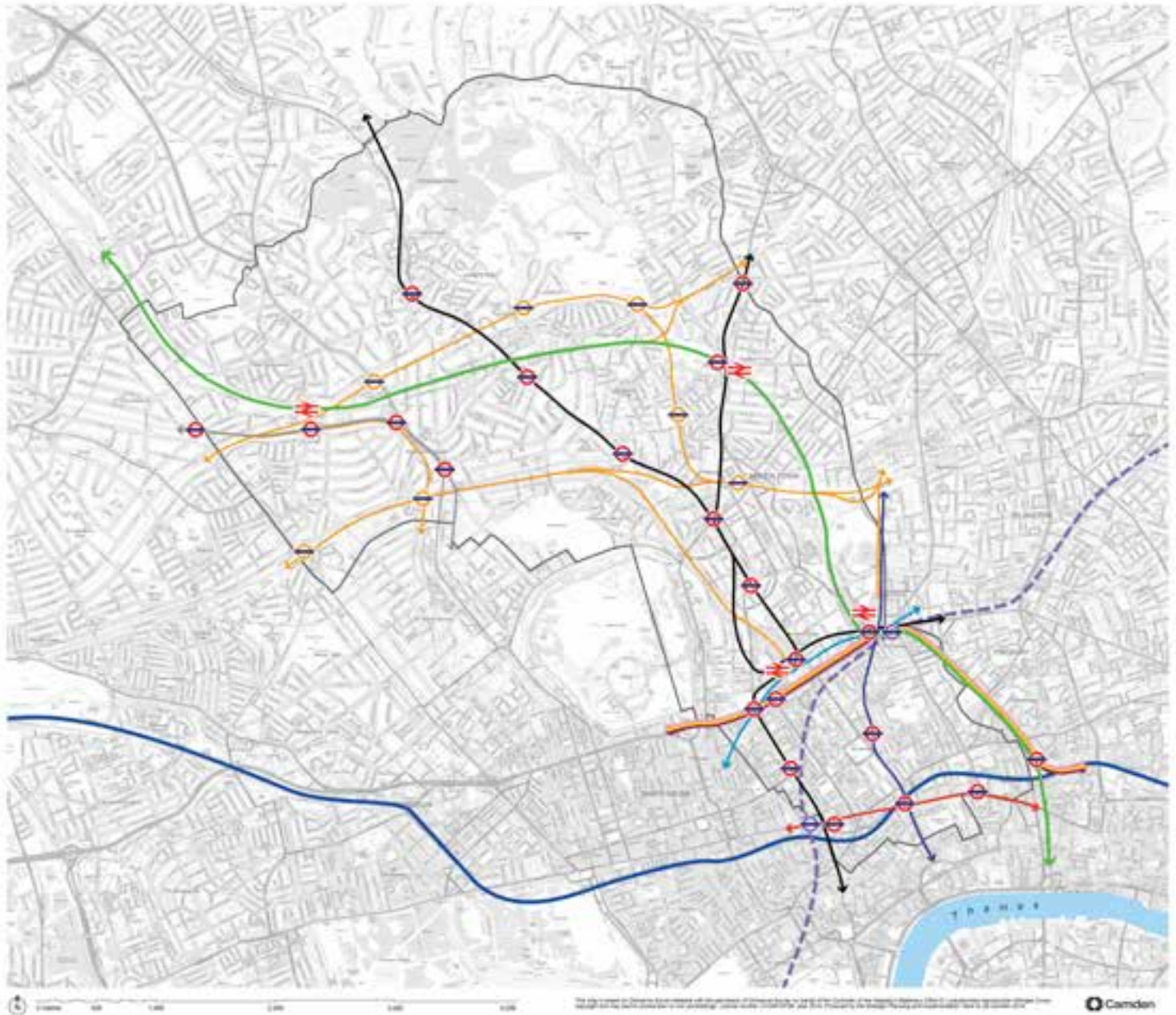
- 10.11 Cycling is an increasingly popular and sustainable means of travel which we hope to encourage further. The Council will therefore seek to ensure that developments contribute to and, where appropriate, provide appropriate links to strategic cycle routes. We will also expect cycle parking to be convenient and secure, so that users of a development are more likely to use bicycles to travel to and from a site. Details regarding cycle parking standards and design can be found within our supplementary planning document Camden Planning Guidance on transport.
















**Public transport**

- 10.12 In partnership with Transport for London, which manages the public transport network across London, the Council will ensure that Camden's growth is matched by improvements to public transport through planning obligations. It is expected that the majority of contributions towards public transport improvements will be sought towards bus network infrastructure (such as bus stops, shelters, passenger seating, waiting areas, signage, timetable information etc.) where the demand for bus services generated by the development is likely to exceed existing capacity (assessed through Transport Assessments). The Council may also seek contributions from major developments towards other forms of public transport if an existing public transport improvement scheme is available and related to the development. Details regarding public transport contributions can be found within our supplementary planning document, Camden Planning Guidance on planning obligations. Details regarding Transport Assessments can be found within Camden Planning Guidance on transport.
- 10.13 Most journeys involve changing between one form of travel and another and developments will sometimes need to cater for this. Passenger transport interchange facilities should provide for the coordination of arrival and departure timetabling on different services as far as possible. Interchanges catering for longer distance journeys should include toilets, baby changing facilities and facilities to provide refreshment for travellers.
- 10.14 Public transport should be accessible to all, however there are a number of rail and tube stations within Camden that do not offer step-free access. Step-free stations offer accessible routes from entrance to platform via lifts and/or ramps without the need for stairs and/or escalators. Step-free projects are largely managed by Transport for London and/or rail network companies. The Council will however promote step-free access where possible and work with organisations seeking to implement step-free access at Camden stations.

Map 8: Regional Rail networks



- |   |  |
|---|--|
|  Crossrail, Crossrail 2 | <b>Underground</b>   |
|  Thameslink            |  Bakerloo           |
|  Overground            |  Central            |
|   |  Circle             |
|   |  Hammersmith & City |
|   |  Jubilee            |
|   |  Metropolitan       |
|   |  Northern           |
|   |  Piccadilly         |
|   |  Victoria           |
|   |  Overground         |

## Parking and car-free development

- 10.15 Limiting the opportunities for parking within the borough can reduce car ownership and use and therefore lead to reductions in air pollution and congestion and improve the attractiveness of an area for local walking and cycling. Car-free development will also mean that the borough's limited land can be used more efficiently, which will help to free up space to allow additional housing, employment uses, community facilities, play areas, amenity spaces and cycle parking. The Council does however also recognise that some people, businesses and organisations, rely on private car use as their only transport option. Parking provision for disabled people and essential uses will therefore be considered where necessary.
- 10.16 Camden is well connected. In most areas of the borough, essential day to day services such as shops, healthcare and education facilities and employment opportunities are no more than short journey away by walking, cycling or public transport. To compliment Camden's existing levels of parking provision, the borough currently also has the largest car club network in London, with over 250 car club parking bays. The car club network therefore provides a real alternative to private car ownership for people who need to use a car occasionally.

### Policy T2 Parking and car-free development

The Council will limit the availability of parking and require all new developments in the borough to be car-free.

We will:

- a. not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
- b. limit on-site parking to:
  - i. spaces designated for disabled people where necessary, and/or
  - ii. essential operational or servicing needs;
- c. support the redevelopment of existing car parks for alternative uses; and
- d. resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.

### Car-free in new developments

- 10.17 Car-free development means that no car parking spaces are provided within the site other than those reserved for disabled people and businesses and services reliant upon parking, where this is integral to their nature, operational and/or servicing requirements (e.g. emergency services, storage and distribution uses). In addition, current and future occupiers are not issued with on-street parking permits.
- 10.18 All new residential developments in the borough should be car-free. Parking will only be considered for new non-residential developments where it can be

demonstrated that the parking provided is essential to the use or operation of the development. Staff parking is not considered essential and will not be permitted. Parking for disabled people for both residential and non-residential developments should be provided where it can be demonstrated as necessary, taking into account existing availability of on-street parking for Blue Badge holders. Further information can be found within Camden Planning Guidance on transport.

### Redevelopments

- 10.19 Land is an important resource, particularly within a densely populated area such as Camden. The Council will therefore support the development of parking space for alternative uses.
- 10.20 In redevelopment schemes, the Council will consider retaining or re-providing existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed. This is common where an existing dwelling or block is being extended or subdivided. It can also occur where a change of use brings a site or property into residential occupation. If a development is to have new occupiers, this should be car-free. Where redevelopment involves a town centre car park identified in Camden's Site Allocations Plan as supporting the functioning of the town centre, the Council will consider the retention of the existing parking provision or a lower level of provision on-site. Any new development on the existing car park should be car free in accordance with Policy T2.





**Boundary treatments and gardens**

- 10.21 Parking can cause damage to the environment. Trees, hedgerows, boundary walls and fences are often the traditional form of enclosure on Camden's streets, particularly in conservation areas, contributing greatly to their character, as recognised in Camden's Conservation Area Appraisals and Management Strategies. This form can be broken if garden features are replaced by areas of paving or hard standing. Development of boundary treatments and gardens to provide on-site private parking often requires the loss of much needed public on-street parking bays to create vehicle crossovers. Areas of paving can also increase the volume and speed of water run-off. This adds to the pressure upon the drainage system and increases the risk of flooding from surface water. Developments seeking to replace garden areas and/or boundary treatments for the purposes of providing on-site parking will therefore be resisted.



## Transport infrastructure

- 10.22 Projects to provide new and improved transport infrastructure will play a central role in supporting growth and promoting sustainable transport within the borough. As major development will largely be concentrated in locations that are, or will be, subject to significant transport improvements, land and facilities will therefore need to be safeguarded in order to ensure delivery of these projects.

### **Policy T3 Transport infrastructure**

The Council will seek improvements to transport infrastructure in the borough.

We will:

- a. not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects; and
- b. protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance;

- 10.23 Camden's Infrastructure Table (Appendix 1) contains details of the key infrastructure improvements due to take place. The schedule includes 32 transport projects such as:
- High Speed 2: new north-south railway linking London to Birmingham including potential redevelopment of Euston Station.
  - Crossrail 1: new east-west railway through London from Reading/Heathrow to Abbey Wood and Shenfield.
  - Crossrail 2: new north-south railway running from Surrey to Hertfordshire through London.
  - West End Project: introduction of two-way traffic at Tottenham Court Road and Gower Street and public realm improvements, including at Euston Circus, St Giles Circus and Princes Circus.
  - Camden Town and Holborn Station capacity improvements.
  - North-South Cycle Superhighway: segregated cycle corridor between King's Cross and Elephant and Castle.
- 10.24 Given the constraints on transport capacity in a densely developed borough like Camden, almost every part of existing transport infrastructure is a valuable asset. The Council will therefore seek to protect all existing and proposed transport facilities and links and safeguard the potential for improvements to the transport network.

## Sustainable movement of goods and materials

- 10.25 The movement of goods and materials by road can have a significant impact on the environment and the health and wellbeing of residents, in terms of noise disturbance and its contribution to road congestion and air pollution. These impacts are particularly severe in an urban, densely populated borough such as Camden.
- 10.26 As Camden grows, demand for freight is also likely to increase. The number of vans in Central London, for example, is forecast to grow by 30 per cent between 2008 and 2031.
- 10.27 The flexibility that road freight offers means that this will remain the most commonly used means of transporting freight for some time. The Council will however seek to promote more sustainable means of freight transport and seek to minimise the movement of goods and materials by road.

### **Policy T4 Sustainable movement of goods and materials**

The Council will promote the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road. We will:

- a. encourage the movement of goods and materials by canal, rail and bicycle where possible;
- b. protect existing facilities for waterborne and rail freight traffic and;
- c. promote the provision and use of freight consolidation facilities.

Developments of over 2,500 sqm likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to:

- d. minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads;
- e. accommodate goods vehicles on site; and
- f. provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.

### **Cycle freight**

- 10.28 The Council will promote the use of cycle freight as an extension to cycle courier services by encouraging developers to make provision for cycle freight as part of Delivery and Servicing Management Plans. This provides the potential to manage deliveries in a way that is zero carbon, has little or no noise or air pollution implications and has a minimal impact on congestion. Further information regarding Delivery and Servicing Management Plans is available within our supplementary planning document Camden Planning Guidance on transport.

### **Rail and water freight**

- 10.29 The Council recognises the problems that are caused by long distance movement of goods by road and the potential advantages of using rail and water as alternatives.
- 10.30 The North London Line, the Gospel Oak to Barking Line and the West Coast Mainline are already used for significant volumes of rail freight. Rail freight is promoted as a real alternative to road as it contributes nearly 90% per tonne fewer emissions.
- 10.31 Regent's Canal is thought to be an economically viable route for some freight movements, notably the removal of demolition waste from canal-side sites. The Council will expect new developments along or close to the Canal to consider its use for the movement of goods and materials and to contribute to the improvement of the Canal towpath, where appropriate. The Canal is a Metropolitan Site of Importance for Nature Conservation (SINC) as it supports a range of aquatic flora, fish species, invertebrates, waterfowl and a variety of waterside plants growing on its brickwork and banks. Developments which generate freight movements via the Canal may be required to provide evidence that operations will not cause excessive disturbance to habitats in line with Policy A3 Biodiversity.
- 10.32 The Council will seek to protect track side freight processing sites such as the existing aggregate handling facility at King's Cross, which is a modern facility re-engineered in association with works for the Channel Tunnel Rail Link. We will also seek to protect Canal-side freight facilities.

### **Freight consolidation**

- 10.33 The Council will promote the use of freight consolidation centres within Delivery and Servicing Management Plans following the success of the London Boroughs Consolidation Centre (LBCC) pilot project. This resulted in over 80 of the Council's external suppliers delivering to a consolidation centre in Edmonton. Within consolidation centres, goods are grouped together so that fewer delivery journeys are required by road. This new approach helps reduce congestion, air pollution and noise on Camden's roads. The project resulted in a 46% reduction in the number of vehicle trips and 45% reduction in kilometres travelled from freight vehicles delivering goods to over 300 buildings covering 10% of London's geography. Further information regarding Delivery and Servicing Management Plans is available within our supplementary planning document Camden Planning Guidance on transport.

### **Moving goods and materials on appropriate roads**

- 10.34 The roads considered to be most suitable for use by lorries and other heavy goods vehicles are those in the Transport for London Road Network and others designated as Major Roads. Heavy goods vehicles should therefore be routed to minimise the use of district and local roads for the movement of goods, particularly roads which provide primarily for access to residential properties.

**Accommodating goods vehicles on site**

- 10.35 The impact of goods vehicles can be reduced where a loading and unloading bay is included within a development, particularly where the bay can be enclosed. Developments should therefore incorporate space within the site for goods vehicles. The space required for service vehicles is set out within our supplementary planning document Camden Planning Guidance on transport.

**Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments**

- 10.36 For further information on the content and application of these documents please refer to Policy A1 Managing the impact of development and our Camden Planning Guidance supplementary planning documents on transport, amenity, and planning obligations.

# 11. Delivery and monitoring



## Delivery and monitoring

- 11.1 This section provides an overview of the ways the Council will deliver the Local Plan's vision, objectives and policies, focussing on how we will:
- work with our partners to deliver our plans;
  - ensure necessary infrastructure is provided;
  - make use of planning obligations and the Community Infrastructure Levy (CIL);
  - monitor the delivery of the Local Plan.
- 11.2 A key mechanism for delivering the Local Plan will be the Council's decisions on planning applications. The policies in the Local Plan and, for relevant locations, the Site Allocations document, Area Action Plans, the forthcoming North London Waste Plan and neighbourhood plans will provide the framework for these decisions. We will also take account of the Council's supplementary planning documents (including Camden Planning Guidance, planning briefs and frameworks and conservation area statements, appraisals and management strategies) when determining planning applications.

### Policy DM1 Delivery and monitoring

The Council will deliver the vision, objectives and policies of the Local Plan by:

- a. working with a range of partners to ensure that opportunities for creating the conditions for growth and harnessing its benefits for the borough are fully explored;
- b. working with relevant providers to ensure that necessary infrastructure is secured to support Camden's growth and provide the facilities needed for the borough's communities. Information on key infrastructure programmes and projects in the borough up to 2031 are set out in Appendix 1;
- c. working proactively in its actions as a landowner and by facilitating land assembly where considered appropriate;
- d. using planning contributions where appropriate to;
  - i. support sustainable development;
  - ii. secure the infrastructure, facilities and services to meet the needs generated by development;
  - iii. mitigate the impact of development;
- e. secure appropriate scheme implementation (including multi-site developments) and control phasing where necessary;
- f. working with neighbouring boroughs to coordinate delivery across boundaries; and
- g. monitoring the implementation of the Local Plan policies and infrastructure provision on a regular basis.

## Working with our partners

- 11.3 Central to the delivery of the Local Plan will be working with our partners and developing new solutions to deliver the Camden Plan. During the preparation of this Local Plan and as part of our duty to cooperate the Council has worked with key delivery partners to ensure the strategy and policies also reflect their aspirations, plans and spending programmes where appropriate.
- 11.4 Camden has a range of distinctive neighbourhoods that are integral to its character which the Local Plan seeks to protect. Our visions and objectives for areas such as Euston and Fitzrovia are set out in Area Action Plans, which have been developed in conjunction with our partners and the communities and business stakeholders.

## Neighbourhood forums

- 11.5 In some parts of Camden, community led neighbourhood plans are being developed by neighbourhood forums to provide additional locally specific policy. The Local Plan sets the strategic context for neighbourhood plans, and these will play an important role in assisting in delivering Camden's growth, as they should not promote less development than set out in the Local Plan. The Council is supporting and advising neighbourhood forums with this work. The Fortune Green and West Hampstead Neighbourhood Plan was the first in Camden to be adopted in September 2015. Once neighbourhood plans are approved they form part of the statutory Development Plan and so will be used alongside other Council adopted planning documents when making decisions on planning applications in the neighbourhood area. Please see our website for more information on the areas in Camden where neighbourhood planning is taking place.

## Central London partners

- 11.6 London's Central Activity Zone (CAZ), with its unique range and concentration of uses/activities, falls within a number of boroughs, including the southern part of Camden (see Map 1: Key Diagram on page 22). The Council will continue to work with Central London boroughs, Central London Forward and the West End Partnership to consider matters such as planning policy, the quality of public areas and pedestrian environment, traffic management / congestion and the infrastructure requirements of Central London, as well as more innovative ways of delivering growth and the objectives for the area.

## Business partners

- 11.7 The Council supports business-led initiatives, including Business Improvement Districts such as Camden Town Unlimited, Inmidtown and Fitzrovia Partnership, that bring together businesses, community groups, third sector partnerships and residents to deliver real change in local areas

## Community

- 11.8 The preparation of the Local Plan has also involved local community groups, residents and businesses as part of the consultation and engagement processes. The Council's Statement of Community Involvement sets out how

we involve the local community and other stakeholders in the preparation and implementation of our planning policy documents and in the consideration of planning applications.

### **Ensuring necessary infrastructure is provided to support growth**

- 11.9 It is vital that the transport facilities and services, utilities and social infrastructure needed to make development work and support local communities are provided, particularly in the parts of the borough that will experience most growth in future years.
- 11.10 In order to support growth in the borough, the Council will safeguard and improve essential social, physical and green infrastructure and work with service providers to ensure the timely delivery of the new and enhanced infrastructure needed to ensure that the quality of life of Camden's residents and workers is not harmed.

### **Infrastructure Study Update 2015**

- 11.11 The Council updated the borough's Infrastructure Study in 2015. This shows the strategic items of infrastructure needed to support growth over the lifespan of the Local Plan. It reviewed relevant infrastructure providers' plans and strategies and was informed by consultation with infrastructure providers. A schedule of key infrastructure programmes and projects likely to be required to support the delivery of new homes, business growth and the creation of sustainable, healthy communities are listed by infrastructure type in Appendix 1. This is not an exhaustive list and other items will be required, as appropriate, in response to new development in the borough.

### **Delivery of infrastructure**

- 11.12 Appendix 1 sets out the anticipated timing or phasing of infrastructure provision where known. This will depend on many factors, including when development takes place, the availability of funding, the timing of major investment (and ability to undertake detailed feasibility studies) and in some cases planning consent for the infrastructure project itself.
- 11.13 Some of the items on the Appendix 1: Infrastructure Table list are already in the process of being delivered. In other cases, they have been identified in service provider strategies and business plans as likely to be required. These investment plans take into account forecast changes in population and household numbers to identify where future capacity issues may occur. There is more scope for certainty in the next 3-5 years than the longer term as major items of infrastructure have been programmed, costs and means of fundraising are at least in outline form and the broad locations of development are well understood.
- 11.14 Where relevant, the individual sections in the Local Plan also contain details of required infrastructure and mechanisms for its delivery.



### **Working with developers and providers**

- 11.15 The Council will encourage dialogue between developers and service providers, including the services provided by the Council itself, to ensure that new infrastructure provision properly acknowledges the opportunities and constraints of the specific development site and its surroundings. For example, it will be important that developers take account of the opportunities to link their schemes with surrounding green infrastructure or consider what infrastructure such as water, waste water, digital or utilities infrastructure need to be in place ahead of development.
- 11.16 Where necessary, development will be phased to ensure it comes forward at the same time as, or following the provision of infrastructure. Growth which is poorly programmed can lead to infrastructure problems and negative impacts on the local population.

### **Council's role in delivery**

- 11.17 Securing development in accordance with the Council's planning policies through the planning application process is the key mechanism for achieving many of the objectives of the Local Plan, together with appropriate enforcement of planning law. Key policies include (but are not limited to) the housing and employment policies, ensuring suitable infrastructure is in place whilst protecting amenity.



- 11.18 Camden Site Allocations (2013) contains information about expected development and the specific infrastructure requirements of the sites and areas in the borough that area expected to experience significant development. The Council will update this document following adoption of this Local Plan.

#### **Council as landowner**

- 11.19 The Council as a landowner can promote and encourage specific development on its land, for example through the Community Investment Programme (CIP). Please see section 1 Delivery and location of growth for more details. The Council may also look to promote or encourage uses on land adjacent to Council land by entering into partnership agreements.

#### **Land assembly**

- 11.20 The Council can play a positive role in implementation of the Plan by facilitating development through use of its land assembly powers, where considered appropriate. Land assembly can be a complex and time consuming process. As a result, the Council will use its powers sparingly, concentrating on priority sites. Council involvement in land assembly is likely to be particularly important at locations where land ownership issues act as a constraint on development and on large sites that offer significant regeneration opportunities. The Council's preferred approach to land assembly will be through negotiation; therefore use of formal land assembly powers will be a last resort. On sites where land assembly is required, the Council will work in partnership with developers and other relevant parties to achieve a mutually beneficial outcome.



## Planning contributions

- 11.21 New development proposals should be sufficiently supported by infrastructure. Both Camden and the Mayor of London have the powers to raise a Community Infrastructure Levy (CIL) to help address this issue. The Council will also use planning obligations, in appropriate circumstances and in accordance with paragraphs 203-205 of the National Planning Policy Framework, to mitigate or compensate for the potential effects of new development.

### Community Infrastructure Levy (CIL)

- 11.22 The Community Infrastructure Levy (CIL) enables local authorities to raise funds for infrastructure to meet the needs arising from new developments. It is based on a formula relating to the type and size of development and is collected when planning permissions for new developments are implemented. Negotiated planning obligations will still be possible for site specific issues and to allow for affordable housing to be delivered.
- 11.23 Camden began collecting the Camden CIL on 1 April 2015, with a charging schedule for different parts of the Borough. The CIL Regulation 123 list was approved in February 2015 and can be found on the Camden website and will be updated as necessary. This defines infrastructure projects or types of infrastructure project to which CIL funding will be applied and in respect of which, by default, Section 106 planning obligations would not normally be sought. CIL will only be charged on the additional floorspace (or 'uplift') in a development.
- 11.24 The infrastructure projects identified for funding through the CIL include improvements to schools, community infrastructure, parks and sports pitches, health projects and transport infrastructure.
- 11.25 The use of CIL limits the use of pooled funding to a maximum of five Section 106 agreements, even where infrastructure is not included in Regulation 123 list.

### Local element of CIL

- 11.26 A meaningful proportion of CIL funding should be spent in the neighbourhood where development arises. Camden has decided to spend 25% of the funding in the relevant local ward, with ward Councillors having a lead role in establishing priorities for and applying to use local CIL monies, in consultation with local communities and neighbourhood forums where these exist. Neighbourhood forums should establish infrastructure priorities (providing detailed projects where possible) in their neighbourhood plan. Where a Neighbourhood Plan has been approved at referendum the priorities contained in the plan that are applicable to the ward should be carried across into the local priorities unless there is a clear reason for doing otherwise agreed by the Cabinet Member.
- 11.27 Additional detail on the Council's approach to CIL is set out in our supplementary planning document Camden Planning Guidance on planning obligations.

### Mayor's CIL

- 11.28 The Mayor of London introduced a CIL in April 2012 with the aim of raising £300m of funding to contribute towards Crossrail, due to open by the end of 2018/19. The Mayor's CIL is charged at £50 per square metre in Camden on all uses except schools/colleges and medical/health services and is collected by Camden.

### Planning obligations

- 11.29 The Council will use planning obligations, in appropriate circumstances and in accordance with paragraphs 203-205 of the National Planning Policy Framework to mitigate or compensate for the potential effects of developments. This will be where existing and planned infrastructure provisions are not adequate to meet the needs generated by a development proposal.
- 11.30 Planning obligations (sometimes called Section 106 agreements) can help to contribute to the success of a development and achieving the Council's aims for a site, its local area and the borough as a whole. They can enhance the quality of a development and ensure it does not give rise to unacceptable planning impacts. Planning obligations will only be sought where it is not possible to deal with the matter through the imposition of a condition on a planning permission. It is not possible to use planning obligations for items that are to be funded by the Community Infrastructure Levy (CIL).



11.31 The measures sought through a planning obligation will vary depending on the nature and scale of a development scheme, its location and impacts. The main matters that the Council considers are likely to be addressed through such agreements are:

- on-site provision of:
  - infrastructure to mitigate the direct impacts of development, such as landscaping, servicing and direct access (these may also be addressed through S278 agreements), particularly for major developments (where not CIL funded);
  - affordable housing;
  - open space and its maintenance (particularly in larger schemes)
- tackling climate change and environmental impacts;
- training, skills and regeneration;
- phasing of development; and
- other obligations necessary to making a development acceptable.

11.32 This list is not exhaustive and development schemes can individually or cumulatively introduce a range of issues, requirements and impacts that may justify the use of planning obligations alongside the Camden Community Infrastructure Levy.

11.33 Planning obligations that reduce some negative impacts of a development or otherwise contribute to the Local Plan objectives will not in themselves justify accepting development that conflicts with planning policy

### **Viability**

11.34 Planning obligations can take different forms and can involve the provision of certain requirements 'in kind' or financial contributions. In considering planning obligations, the Council will take into account economic viability, the full range of benefits provided by a development, the extent to which it contributes towards delivering the objectives of this Local Plan and other planning policies and whether a development is publicly funded.

11.35 Where during the negotiation of a proposed scheme, it is argued that the Council's request for contributions would render development unviable, we will expect developers to provide information on viability through an open-book approach. The Council supports transparency in decision making and will seek the maximum reasonable disclosure of information in viability appraisals having regard to any elements that are commercially sensitive. However, because the provision of certain infrastructure is necessary to make development acceptable in planning terms, there will be instances where reducing contributions on viability grounds would make development unacceptable, either because development cannot come forward without it in physical or safety terms or because it is necessary to mitigate the impacts of growth.

### **Pooled contributions**

11.36 Pooled contributions will be used when the combined impact of up to five schemes create the need for related infrastructure or works that will not be funded by CIL. Additional detail on the Council's approach to planning obligations is set out in the supplementary planning document Camden Planning Guidance on planning obligations.



### Co-ordinating with neighbouring boroughs

- 11.37 Under the Localism Act 2011 and the tests of soundness in the National Planning Policy Framework local authorities have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities
- 11.38 The Council has worked with neighbouring boroughs, the wider North London sub-region and other Central London local authorities to ensure that Camden's Local Plan takes account of their plans and programmes, as well as the spending and delivery plans of regional bodies such as Transport for London.
- 11.39 The Council has worked closely with neighbouring boroughs to ensure that a consistent approach is taken in relation to growth areas and town centres which straddle borough boundaries. To this end, discussions with Westminster, in relation to the Tottenham Court Road area, and with Brent, in relation to Kilburn High Road town centre, have informed and shaped the direction taken on these locations in the Local Plan. In addition, we have prepared our housing market evidence for this Local Plan in conjunction with the London Borough of Islington.
- 11.40 We are also preparing a joint Waste Plan with the six other North London Boroughs (Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest). This will show how the authorities will meet their apportionment of waste in the London Plan. It will also contain a suite of development management policies. See Policy CC5 Waste for further details.
- 11.41 Working closely with our partners in the delivery of the Local Plan will help in the identification, as early as possible, of matters and situations that may affect delivery.



## Flexible implementation of the Local Plan

- 11.42 The Local Plan needs to be flexible enough to ensure that the Council's vision and objectives for Camden can be delivered in future years despite changing circumstances. This is particularly important with regards to delivering our approach to Camden's growth and meeting the borough's needs for homes, jobs, services and infrastructure.
- 11.43 There is a need for sensitive and flexible implementation. However, while our plans must be suitably flexible, it is vital that the level of flexibility does not create uncertainty or harm the overall delivery of the Local Plan. This Local Plan has therefore been prepared to be flexible enough to cope with a changing world, while ensuring our vision and objectives for the borough are delivered.
- 11.44 Sometimes the Local Plan's implementation will rely upon appropriate alternative or amended approaches to deal with emerging issues and changing circumstances.
- 11.45 Individual policies in this Local Plan include an element of flexibility where appropriate, in particular in relation to the consideration of the viability of development schemes, the feasibility of particular measures and site specific issues. Given the plan's priority for housing provision it will be important to closely monitor the supply of housing and make adjustments to the way we implement our Local Plan policies to ensure that targets are met. There are a number of areas of flexibility in the council's policy approach to ensure that our targets for additional homes are met. See the Housing policies for more detail.
- 11.46 Within the Plan period, efficiency savings in the public and voluntary sector will require the need to find more effective ways of delivering services. This may entail the greater consolidation of sites in order to cluster and maximise the impact of local services. The Local Plan takes account of changing forms of delivery in its policies relating to the retention and reprovision of services. It is also anticipated that the demand for some physical assets will continue to decline as more services become accessible online.

## Monitoring

- 11.47 The Council will monitor the effectiveness of the Local Plan in delivering its objectives by regularly assessing its performance against a series of indicators. We will publish authority monitoring reports annually, which will:
- assess the performance of the Local Plan policies;
  - set out the Council's updated housing trajectory;
  - identify the need to reassess or review any policies or approaches;
  - make sure the context and assumptions behind our strategy and policies are still relevant; and
  - identify trends in the wider social, economic and environmental issues facing Camden.
- 11.48 Regular monitoring will be a key tool in providing flexibility. This will measure progress in delivering the Local Plan, and identify any aspects that are not being achieved as planned and any changing circumstances that may affect implementation. This will allow us to adjust the application of policies where appropriate and, if necessary, bring forward alternative approaches or policies.





# 12. Appendices



## Appendix 1: Infrastructure Table

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
<b>CHILDREN AND EDUCATION SERVICES</b>						
1	Early years	Provision of additional 545 full time equivalent early years places (for three and four year olds) to meet identified need.  Extending the early years' places to the most disadvantaged 2 year olds.	Borough wide	LB Camden – Children, Schools and Families Directorate	2017-2031.	Funding partly through S106 where need arises. Potentially through CIL in the future. Places based on statutory requirement of 15 hours per week.  From September 2014, the Government extended eligibility to the 40% of the most disadvantaged 2 year olds. It is expected over 900 children in Camden will be able to qualify.
2	Primary Schools	Expansion of Kingsgate School, Liddell Road (2 Form entry).	West Hampstead (North West sub area)	LB Camden – Children, Schools and Families Directorate (School Place Planning)	2016/17.	Schools' capacity is planned taking into account projected population growth and information on housing sites (e.g. Camden's Site Allocations).  Government funding is used for school place provision and some developer contributions (including provision in kind). Liddell Road is one of the Council's Community Investment Programme schemes.  Provision at King's Cross Academy, Kingsgate School and Hawley is considered to provide sufficient primary school places until at least 2024. Additional capacity of 1FE could potentially be made available at Edith Neville school if required – see below.
3	Primary Schools	New school (2 Form entry) – King's Cross Academy.	King's Cross (South of Euston Road sub area)	LB Camden – Children, Schools and Families Directorate (School Place Planning)	2015	As above

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
4	Primary Schools	Hawley School – additional 123 places (as part of the Hawley Wharf development)	Camden Town with Primrose Hill (Central North sub area)	LB Camden – Children, Schools and Families Directorate (School Place Planning)	2016/17	As above
5	Primary Schools	Abacus Belsize School – expansion of provision (1 Form entry) (unconfirmed).	Belsize (Central North sub area)	Free school / Department for Education	2017.	As above.
6	Primary Schools	Redevelopment of Edith Neville School and Children’s Centre	St Pancras and Somers Town	LB Camden – Children, Schools and Families Directorate	2018	Redevelopment to provide school with improved facilities and flexibility to expand to a 2 Form Entry school in the future, being delivered as part of the Central Somers Town project which forms part of Camden’s Community Investment Programme.
7	Primary Schools	Relocation of Maria Fidelis Lower School	Euston	Education Funding Authority (EFA)	2017/18	Relocation of Maria Fidelis Lower School to a consolidated site at Phoenix Road/Drummond Crescent.
8	Primary Schools	Additional Primary School provision at Euston as part of mixed use development	Euston	Future development partner(s)	2024-2030	Provision at Euston will be to meet demand associated with new development and will be delivered as part of and alongside mixed use development at Euston and/ or the expansion of existing schools in the locality where feasible.
9	Primary Schools	Primary School improvement works – scope of works will differ for each school but will typically include: technology/science teaching facility upgrades, acoustic improvements, kitchen and dining room improvements and accessibility improvements.	Borough wide	LB Camden – Children, Schools and Families Directorate	2017-2031	Community Infrastructure Levy (strategic portion).



Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
10	Secondary Schools	Maintaining secondary school provision to meet the demand for places.	Borough wide	LB Camden – Children, Schools and Families Directorate (School Place Planning)	2017-2031	<p>Schools' capacity is planned taking into account projected population growth and information on housing sites (e.g. Camden's Site Allocations).</p> <p>Government funding and some developer contributions (including provision in kind) are used for school place provision.</p> <p>There are expected to be sufficient school places until 2024/25, although 'bulge classes' / fixed term expansion may be required in 2022/23 and 2023/24. Regent High School can potentially provide 2 Form Entry at the point when needed.</p> <p>Additional capacity is likely to be needed to serve development in the Euston area.</p>
11	Secondary Schools	Site specific modernisation (including ICT improvements) and building works, including accessibility improvements	Borough wide	LB Camden – Children, Schools and Families Directorate (School Place Planning)	2017-2031	Community Infrastructure Levy (strategic portion)
12	Further Education	Gross demand of 1,030 places – 830 sixth form places and 195 Form Entry College and work based learning places	Borough wide or elsewhere in Greater London	Education Funding Agency and Skills Funding Agency	2017-2031	<p>The Further Education provider is Westminster Kingsway College (WKC).</p> <p>The gross demand data was estimated by AECOM as part of the Camden Infrastructure Study using standard benchmarks for Further Education. No data was available from WKC.</p>

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
13	Adult Learning.	281 additional adult learning places will be required to meet growth in population.	Borough wide (and within other London Boroughs)	Skills Funding Agency / various providers including WKC and City Lit.	2017-2031	LB Camden provides a package of Adult Community Learning supported by the Community Learning and Adult Skills Budget.
<b>HEALTHCARE SERVICES</b>						
14	Primary Healthcare – GPs.	Gross demand of 19 additional full time equivalent GPs.	Borough wide	NHS England and Camden	2017-2031	There are a number of models of delivery for meeting increased GP provision including the creation and expansion of facilities and co-location with other community services.  Gross demand estimate: AECOM Infrastructure Study  Existing provision is considered to be vulnerable to expiry of leases, retirement of GPs and poor quality premises.
15	Other healthcare facilities	Proton Beam Therapy cancer treatment facility	Bloomsbury	UCLH NHS Foundation Trust	Planning	Under construction
16	Other healthcare facilities	New laboratory/research space for Institute of Immunity and Transplantation and patient hotel	Gospel Oak, Hampstead Town	Royal Free	Planning	Application approved.
17	Other healthcare facilities	New head and neck outpatient hospital	Bloomsbury	UCLH NHS Foundation Trust	Planning	Application approved.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
<b>ADULT SOCIAL CARE</b>						
18	Community Resource Centre at Greenwood Place.	A new day care facility providing services for people with dementia, mental health conditions and learning difficulties. It will also host the Centre for Independent Living giving advice and support for people with disabilities.	Kentish Town	LB Camden – Adult Social Care	2018	A Community Investment Programme (CIP) project. The proposal provides accommodation for each client group as well as flexible, communal space. Funding from capital receipts, disposal of existing facilities and Section 106.  Provides additional capacity for young people with profound and multiple learning difficulties who use services outside of Camden.
19	New facility in Crogsland Road	Development of a new resource centre with provision of extra care flats for older people	Haverstock	LB Camden – Adult Social Care	2017	Replacement of Charlie Ratchford Resource Centre in Belmont Street.
20	Holmes Road Hostel	Redevelopment of the hostel to create 59 studio units for single homeless people	Kentish Town	LB Camden – Housing and Adult Social Care	2016	A Community Investment Programme (CIP) project. Disposal of one hostel contributing to the redevelopment of two sites (Mount Pleasant opened in 2014 providing 50 studio units).
<b>LEISURE AND COMMUNITY FACILITIES</b>						
21	Increasing capacity of sports halls	This is likely to be met through the provision of new sports halls, extending opening hours and optimising the use of existing facilities, including shared-use agreements	Borough wide taking account of existing provision	Private developer / Schools through dual-use agreements	Plan period.	The Open Space, Sport and Recreation Study 2014 identified the need for additional sports hall provision. At least a further 3 multi-purpose sports halls is estimated to be needed to meet demand.  An indoor MUGA facility is expected to open at King's Cross Central in 2016 and a new sports hall is also expected to be delivered in this area by 2021.  Potential for Community Infrastructure Levy to be used to refurbish and maintain existing sports facilities.
22	Provision of a gymnastics facility	The specialist facilities provided at Talacre Community Sports Centre are at full capacity.	Borough wide taking account of existing provision	LB Camden / private developer	Plan period.	There is currently no commitment to increase provision but there would appear to be an unmet demand, This is included in the overall demand for sports halls referred to above.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
23	Additional tennis provision	New tennis facilities are likely to be needed to support growth.	Borough wide taking account of existing provision	LB Camden / private developer	Plan period	The Open Space, Sport and Recreation Study (2014) identified the need for an additional 4 tennis courts to meet demand.
24	Provision of new public open space and enhancement of existing spaces and their facilities.	New public open space will be secured through development schemes, with priority given to deficiency areas.	Borough wide taking account of deficiency areas	Private developers / LB Camden Parks and Open Spaces working with landowners, land managers and community management.	Plan period	<p>This will be delivered through the implementation of Local Plan Policy A2.</p> <p>Developers to address site-specific need and mitigate impact on existing provision through Section 106 agreements. CIL will potentially fund some strategic park improvement projects which are not directly related to individual development proposals.</p> <p>The Council's Green Spaces Investment Programme is a 5 year programme funded by a combination of developer contributions, capital funding and external grants. Some funding likely to be raised through ward proportion of CIL for community identified projects.</p>
25	Improving access to nature through biodiversity enhancing measures in new development.	<p>Biodiversity gains are achieved through the provision of new natural greenspaces in major developments and enhancement measures delivered through other schemes e.g. green roofs, wildlife corridors, biodiversity enhancing landscaping.</p> <p>The Council is working with partners to develop the biodiversity value of parks and the use of nature sites as an educational resource.</p>	Borough wide taking account of deficiency areas	Private developers / LB Camden Parks and Open Spaces	Plan period	<p>This will be delivered through the application of Local Plan Policy A3.</p> <p>Camden's Biodiversity Action Plan (BAP) runs 2013-2018.</p> <p>There are three key areas of focus:-</p> <ol style="list-style-type: none"> <li>1. Access to Nature</li> <li>2. The Built Environment</li> <li>3. Open Spaces and Natural Habitats</li> </ol> <p>Developments will be required to mitigate their impact through Section 106 agreements.</p>

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
26	Improvements to the quality and access of playspace for children and young people	New and refurbished playspace for children and young people	Borough wide taking account of deficiency areas		Plan period	<p>Developers to address site-specific need and mitigate impact on existing provision through Section 106 agreements. Some strategic playspace improvements may potentially be delivered through CIL funding.</p> <p>The Open Space Study shows all wards in the Borough have areas outside of the catchment area for formal children's play facilities.</p>
27	Establishment of new allotments and food growing areas.	Expansion of opportunities for food growing including incorporation of allotments and community gardens in major developments, planting of food growing strips, roof gardens, re-use of open space (e.g. housing estate amenity space) and temporary use of vacant or derelict land and buildings.	Borough wide taking account of deficiency areas.	LB Camden Parks and Open Spaces / allotment associations / private organisations and voluntary groups	Plan period	<p>The identified space for food growing may be secured on development sites through planning conditions or Section 106 agreements.</p> <p>The spatial provision of allotments is uneven with around half of all households outside the catchment area for council or community managed allotments.</p>
28	Street trees programme	Planting of additional street trees to ensure 800 new trees are planted. New developments and public realm schemes to include trees in their design wherever possible.	Borough wide	LB Camden Trees team and Highways / Transport for London	Plan period – new tree target (2010-2020).	<p>The Council will ensure new trees are considered as part of new developments in the design process, including use of Section 106 agreements.</p> <p>Potential funding through CIL for street trees as part of general public realm works in the future.</p> <p>Funding support will be sought from the Mayor of London /TfL in appropriate cases.</p>
29	Libraries	Review of library service being undertaken by the Council.	Borough wide	LB Camden Culture and Leisure	2016 onwards	The Council ran a 12 week consultation on future options for the running of the library service during Summer/ Autumn 2015. A new Library Strategy is being prepared by the Council and is expected to be implemented in April 2016.



Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
30	Community Centres	Upgrading of community centres	Various locations	LB Camden	2017-2020.	<p>Potential use of S106 funding to address site-specific need and impact on existing provision, particularly on large sites.</p> <p>Projects being implemented include:</p> <ul style="list-style-type: none"> <li>• Re-provision of St Pancras Community Centre;</li> <li>• Repair and improvements to Highgate New town Community Centre;</li> <li>• Redevelopment of the Surma Centre;</li> <li>• New Abbey Community Centre proposed as part of the Abbey area redevelopment project.</li> </ul> <p>Potential use of CIL for general upgrades of community facilities or new provision where the need for this is unrelated to a specific development.</p>
<b>STRATEGIC TRANSPORT</b>						
31	London Overground capacity improvements on North London Line	<p>5 car trains being introduced to reduce crowding.</p> <p>This will potentially increase to 6 car operation, subject to Old Oak Common being delivered.</p>	Highbury and Islington to West Croydon/ Clapham Junction and Richmond/ Clapham Junction to Stratford	Transport for London / Network Rail	2015 2019-2024.	<p>London Overground Capacity Improvement Project.</p> <p>The North London Line runs east to west through Camden; there are 6 stations on this line in the Borough</p>
32	London Overground Gospel Oak – Barking line	Electrification project to allow operation of longer, electric trains.	Gospel Oak to Barking line	Transport for London / Network Rail	By 2017	The Gospel Oak line has one station in Camden at Gospel Oak

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
33	Crossrail 1	Delivery of east-west new railway through London from Reading/ Heathrow to Abbey Wood and Shenfield	Central Activities Zone	Transport for London and Department for Transport	2017-19.	Linked to the realisation of regeneration and intensification opportunities within the Central Activities Zone. Crossrail stations at Tottenham Court Road and Farrington most likely to support Camden's growth. Funding from public bodies, Mayoral CIL and Business Rate Supplement.
34	Crossrail 2	Planned to relieve mainline rail terminals and crowding on London Underground lines. It would link south west and north east London. Stations being proposed in the Borough are at Tottenham Court Road (to link with Crossrail 1) and off Euston Road.	Cross borough	Transport for London and Department for Transport.	By 2030	Updated 'safeguarding directions' for Crossrail 2 were issued by the Secretary of State for Transport in March 2015.  The estimated cost is £12-20bn at 2012 prices.
35	High Speed Two (HS2)	New railway linking London Euston and Birmingham Curzon Street (Phase 1). Further extension to cities north of Birmingham (Phase 2)	Cross borough	Department for Transport / HS2 Ltd	Phase 1	The Secretary of State for Transport has issued 'safeguarding directions' for the HS2 rail line.  Planned construction start date is 2017.
36	Potential redevelopment of Euston Station	Comprehensive redevelopment of Euston railway station – potentially a component of High Speed 2.	Euston area	Network Rail / Transport for London / HS2	Late 2020s	The Euston Area Plan is intended to help shape change in the area around Euston Station up to 2031. It was prepared jointly by Camden Council, the Greater London Authority and Transport for London . Euston is identified as a Growth Area for significant development in this Plan regardless of whether HS2 goes ahead. Camden will also prepare a planning brief to guide the redevelopment above and around the station
37	Thameslink Programme	To allow operation of up to 24 trains per hour during peak periods with longer 12 car trains, significantly enhancing capacity	Cross borough	Network Rail	By 2018	The Thameslink runs north-south from Bedford to Brighton with stations in Camden at West Hampstead, Kentish Town, St Pancras and Farringdon. The Thameslink Programme will provide new destinations including Peterborough and Cambridge.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
38	Northern Line Upgrade and Extension	Increasing service frequency and capacity to at least 30 trains an hour on main branches at peak periods.	Cross borough	Transport for London	2020	Northern line runs from Edgware and High Barnet/Mill Hill East to Morden through the West End and the City. There are stations in Camden at King's Cross, Euston, Warren Street, Goodge St., Tottenham Court Road, Mornington Crescent, Camden Town, Chalk Farm, Belsize Park, Hampstead and Kentish Town.
39	Piccadilly Line improvement	Renewal of signalling and train fleet	Cross borough	Transport for London	Mid 2020s	Piccadilly Line runs from Heathrow to Cockfosters. There are stations in Camden at King's Cross, Russell Square and Holborn.
40	Rebuilding of Tottenham Court Road Station	Provision of new ticket halls to serve the Underground and Crossrail 1. Provision of step free access.	Tottenham Court Road	Transport for London and Department for Transport	2016-2018	Tottenham Court Road station is now refurbished with a new ticket hall and step free access and full completion is due in 2018 when Crossrail (Elizabeth line) services commence.
41	Improvements to Camden Town Underground Station	Station upgrade to increase capacity and provide step-free access from street to platforms.	Camden Town	Transport for London	2019-2024	Subject to funding
42	Capacity upgrade of Holborn Underground Station	Station upgrade to increase capacity and provide step-free access from street to platforms.	Holborn	Transport for London	Mid 2020s	Subject to funding
43	West Hampstead Overground station improvements	Enhanced accessibility and station facilities	West Hampstead	Transport for London	2016-2017	Funding secured. Planning application approved 2015.
44	LU Sub-surface upgrade	New train fleets and new signalling system to allow increased service frequency on Circle, Hammersmith and City and Metropolitan Lines	Cross borough	Transport for London	By 2023	Stations in Camden on the Circle, Hammersmith and City and Metropolitan Lines are Euston, Kings Cross St Pancras and Euston Square.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
45	Night Tube	London Underground will provide night time running on a number of lines on Fridays and Saturdays	Cross borough	Transport for London	From 2016	Initially this service will run on the Jubilee and Victoria lines and parts of the Central, Northern and Piccadilly lines. TfL plans to expand this onto other tube lines once modernisation works have been completed. It is envisaged night running could extend to parts of the Overground network from 2017.
46	Step-free access	Step-free access stations have lifts or ramps (or a combination of both) – so that customers don't have to use escalators or stairs to move between the street and platform.	At specified stations	Transport for London	By 2024	<p>Step-free access is currently programmed at the following stations:</p> <p>Tottenham Court Road – by 2016/17,</p> <p>West Hampstead Overground – by 2017/18,</p> <p>Camden Town and Holborn – by 2023/24 (TfL website).</p> <p>There are a number of stations where step-free access is still not committed including West Hampstead Underground station, Kentish Town National Rail station, Kentish Town Underground station and Kentish Town West on the London Overground.</p> <p>The responsibility for making stations and platforms fully accessible lies with the railway industry (Network Rail, Train Operating Companies and/or TfL depending on the station).</p>
47	West End Project	Introduction of two-way traffic at Tottenham Court Road and Gower Street and public realm improvements at Euston Circus, St Giles Circus and Princes Circus.	Central Activities Zone	LB Camden with partners	2015-2017	Transport for London funding and S106 contributions.
48	Holborn Improvement Project	A major scheme supporting improvements in the area being delivered through Crossrail, In Midtown Business Improvement District and at Holborn Underground Station	Holborn	LB Camden with partners	2016-2021	Potential Transport for London funding, subject to a successful bid. This is distinct from the capacity upgrade of Holborn Underground Station.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
49	Holborn and Bloomsbury Area Scheme	Urban realm and road safety improvements, reducing traffic dominance.	Holborn	LB Camden with partners	By 2018	<p>The Council maintains a rolling three year programme of investment with an annual financial allocation made by TfL to support delivery.</p> <p>Area based schemes are funded through a block grant from Transport for London (part of the Corridors, Neighbourhoods and Supporting Measures programme).</p> <p>Supplemented by funding from developer contributions and LB Camden funding. Works closely related to development on particular sites will be sought through s106 but other works will be funded through CIL..</p>
50	Kilburn Area Scheme	Urban realm and road safety improvements, regeneration of the High Street.	Kilburn	LB Camden with partners	By 2017	As above
51	King's Cross Area Scheme	Walking, cycling and urban realm improvements. Addressing the gyratory and movements north-south across Euston Road. Also see number 58 in this table.	King's Cross	LB Camden with partners	By 2016	As above
52	Farringdon Area Improvements	Urban realm and cycle permeability measures	Routes to Farringdon station	LB Camden with partners	By 2018	As above
53	Camden and Kentish Town and Wider Area Scheme	Improving cycle permeability with a focus on east-west routes and extending the Royal College Street cycle route. Also see number 59 in this table.	Camden Town and Kentish Town	LB Camden with partners	By 2022	As above



Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
54	Borough-wide schemes	Schemes include advanced stop lines for cyclists, a borough-wide 20mph limit, pedestrian signage and way-finding and cycle hire		LB Camden	Rolling 3 year	The Council maintains a rolling three year programme of investment with an annual financial allocation made by TfL to support delivery.  These borough wide schemes are also supported by the block grant from Transport for London (part of the Corridors, Neighbourhoods and Supporting Measures programme).
55	Cycle Superhighway 11	A new cycle route from West Hampstead to Hyde Park Corner including improvements to Swiss Cottage gyratory	Cross borough	Transport for London / LB Camden	No	As above
56	Quietways	Cycle routes intended to link destinations in the Central London area with back street routes, including parks and waterways	Central London	Transport for London / LB Camden	2016 onwards	As above
57	Central London Cycle Grid	A network of high quality and high volume cycle routes formed from cycle superhighways, quiet shared streets and local links	Central London	Transport for London / LB Camden and partners	By 2016	As above
58	King's Cross gyratory project	Transport for London led project to improve safety for road users and reduce the impact of traffic. Part of area scheme above (number 51 in this table).	King's Cross	Transport for London	By 2021	The King's Cross project would focus on a number of 'A' roads in the King's Cross area within LB Camden and Islington. A feasibility study is underway and TfL (with LB Camden and Islington) aim to hold a public consultation on proposals in mid 2017.  Modifications to the gyratories would potentially allow two-way running of traffic.
59	Camden Town gyratory project	Transport for London led project to improve safety for road users and reduce the impact of traffic. Part of area scheme above (number 53 in this table).	Camden Town	Transport for London	By 2022	As above

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
60	Bus service enhancement	Bus service enhancements where required to mitigate the impacts of growth	Borough wide	Transport for London	Plan period	Enhancements to the frequency, capacity and routing of bus services to mitigate the impacts of growth.  Funded by developer contributions to support the impacts of larger developments.
61	Highways maintenance and improvement	Provision, improvement, replacement, operation or maintenance of highway infrastructure (including carriageways, footways, drainage and street lighting)	Borough wide	LBC Highways	Plan period	Community Infrastructure Levy (strategic portion)  Excludes site-specific accessibility improvements (highway and related works) and vehicular crossovers which will continue to be funded through developer agreements.
<b>UTILITIES AND PHYSICAL INFRASTRUCTURE</b>						
62	Water supply	Every five years water companies produce Water Resources Management Plans (WRMPs) which set out the current water supply-demand balance and use population projections to ensure that future population growth is planned for. A c.25MI capacity reservoir has been commissioned at Barrow Hill to provide adequate storage capacity.	Barrow Hill and rest of Borough	Thames Water	2015-2020	The WRMP contains specific resource development schemes and demand management actions.  Thames Water's WRMP 2015-2040 shows there is a forecast surplus of supply in Camden for 2026.

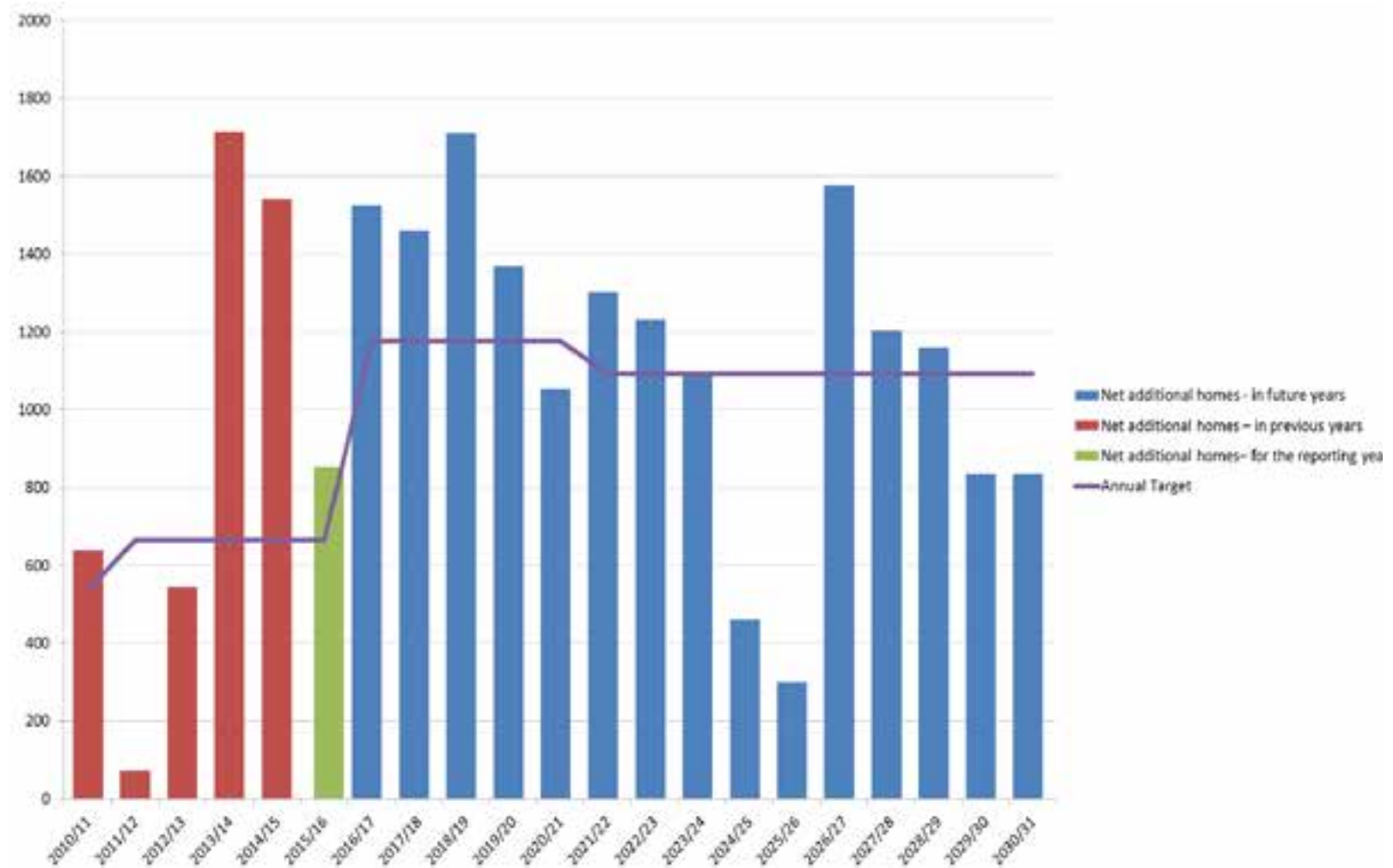
Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
63	Wastewater	<p>A London wide issue is the frequent discharge of storm sewage into the River Thames.</p> <p>The London Tideway Improvement Programme intends to address the issue through the upgrade and extension of Sewage Treatment Works, the construction of the Lee Tunnel and Thames Tideway Tunnel. The current programme of upgrades will accommodate London's growth to 2021. The Thames Tunnel is expected to be complete by 2023.</p>	Whole Borough	Thames Water	Plan period	<p>Investment is financed through charges to water company customers.</p> <p>Thames Water seeks approval of strategic growth schemes from OFWAT through a 5 year periodic review (the next review is in 2019).</p>

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
64	Development of local heating networks	<p>Development of a Combined Heat and Power network in Somers Town to heat four estates and potentially commercial buildings</p> <p>Francis Crick Institute development to provide heat to four estates</p> <p>Priority areas for further investigation</p>	<p>Somers Town, Euston and potentially other parts of the Borough</p> <p>Areas to the South of Euston Road (Russell Square and Great Ormond Street clusters), areas in the centre of the borough (South Camden and Camley Street clusters), Kentish Town and Kilburn</p>	LB Camden	Plan period	<p>This will be delivered through the application of Local Plan Policy CC1.</p> <p>Extensions to heating networks can potentially be funded by developer contributions (Section 106 or CIL) and the Council's Community Investment Programme</p> <p>The Council will require all new major developments to assess the feasibility of connecting to an existing energy network, or where this is not possible establishing a new network.</p>
65	Waste Management	Modern waste facilities to manage North London's waste. This includes the North London Heat and Power Project – the development of an Energy Recovery Facility (ERF) for use by seven North London Boroughs including Camden	Including Edmonton EcoPark (LB Enfield) – the proposed location for the ERF	North London Waste Authority	2025	The North London Waste Authority is applying for a Development Consent Order for the Energy Recovery Facility.

<b>Item No.</b>	<b>Infrastructure item / programme name</b>	<b>Project / programme description</b>	<b>Location</b>	<b>Delivery lead</b>	<b>Delivery period</b>	<b>Comments</b>
66	Digital connectivity	Improved internet access through the acceleration of high speed connectivity, including public wireless systems.	Borough wide with a focus on where this maximises benefits for the community and business	LB Camden, GLA, BT Openreach and other industry partners	Plan period	Camden's Digital Strategy sets out a series of actions to support the uptake of high quality, next generation connectivity. This includes better connections for businesses and residents already on-line, tackling the 'digital divide' where people lack the confidence to use IT and the greater use of digital technology in delivering services.



## Appendix 2: Housing trajectory



**List of allocated sites, other sources of housing supply, the year(s) of delivery and the total annual housing supply**

	5 year housing land supply					10 years					15 years					15 year totals
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
<b>Allocated Sites</b>																
Middlesex Hospital Annex, Cleveland St WC1																
Arthur Stanley House, 44-50 Tottenham St, W1																
Astor College, 99 Charlotte Street (student bedrooms)																
6-17 Tottenham Court Road & others																
61-63 Tottenham Court Road & 1-7 and 11-13 Goodge Street																
Hawley Wharf, Water Lane and 39-45 Kentish Town Rd.																
Westminster Kingsway College, Regents Park Centre, Longford St.																
Bangor Wharf, Georgiana Street																
57-71 Pratt Street, 10-15 Georgiana Street and Royal College Street																
Former Nurses Hostel, 29 New End																
Phoenix Place WC1																
Royal Mail Sorting Office, 21-31 New Oxford St WC1																
St Giles Circus/Denmark Place (inc 126-40 Charing Cross Rd) WC2H																
Herbal House, 10 Back Hill, EC1R 5LQ																
12-42 Southampton Row & 1-4 Red Lion Square (former Central St Martin College)																
Land Bound by New Oxford Street, Museum Street and West Central Street																
Former BR Staff Club, College Lane																
19-37 Highgate Road, Day Centre, former Lensham House (A&A Storage) 25 and 37 Greenwood Place																
Kentish Town Police Station, 10A, 12A, 14 Holmes Road																
Fire Station 20 Highgate Road																
Belsize Road Car Park ( as part of Abbey Area – Phase 1 2 & 3(Car Park, Health Centre, Hinstock & Eminster)																
277a Grays Inn Road																
Land bound by Wren Street, Pakenham Street, Cubit Street, Langton Walk																
Euston Station and tracks																
EAP - Camden cutting																
132-140 and 142 Hampstead Rd, NW1 (BHS Warehouse)																
Granby Terrace																
110-122 Hampstead Road (Former National Temperance Hospital)																
Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East/ Augustus St																
Kings Cross Railway Lands																
Kings Cross Central - Triangle Site																
Elizabeth Garrett Anderson Hospital, 124-54 Euston Rd WC1																
4 St Pancras Way, St Pancras Hospital																
24-58 Royal College Street (Parcel Force Worldwide Depot)																
100 Avenue Road, Swiss Cottage																
187-199 West End Lane NW6 (West End Lane 1)																
156 West End Lane NW6 (West End Lane 2)																
O2 car park																
Senate House																
<b>Total Site Allocations (self-contained)</b>	384	319	711	378	293	592	522	300	90	85	1,068	720	775	450	450	7,137
<b>Other Local Authority sites providing additional housing through CIP</b>	400	400	200	250	250	200	200	200	150							2,250
<b>Kentish Town Regis Road Growth Area (based on initial discussions)</b>					325	325	325	325								1,300
<b>Other self-contained dwellings with permissions at April 2015</b>	554	554	554	554												2,216
<b>Windfall projections (small sites that do not yet have an allocation or permission)</b>			60		185	185	185	185	185	185	185	185	185	185	185	2,035
<b>Total Site Allocations (student bedrooms)</b>								80	35	30	325	200	200	200	200	1,380
<b>Other student bedrooms with permission at April 2015</b>	218	218	218	218												872
<b>Hostel bedrooms with permission at April 2015</b>	-31	-31	-31	-31												-124
<b>Grand total</b>	1,525	1,460	1,712	1,369	1,053	1,302	1,232	1,090	460	300	1,578	1,105	1,160	835	835	17,016
<b>Annual Local Plan Target (with 5% buffer for 2016/17 – 2020/21)</b>	1176	1176	1176	1176	1176	1092	1092	1092	1092	1092	1092	1092	1092	1092	1092	16,800



## Appendix 3: Noise thresholds

The significance of noise impact varies dependent on the different noise sources, receptors and times of operation presented for consideration within a planning application. Therefore, Camden's thresholds for noise and vibration evaluate noise impact in terms of various 'effect levels' described in the National Planning Policy Framework and Planning Practice Guidance:

- NOEL – No Observed Effect Level
- LOAEL – Lowest Observed Adverse Effect Level
- SOAEL – Significant Observed Adverse Effect Level

Three basic design criteria have been set for proposed developments, these being aimed at guiding applicants as to the degree of detailed consideration needed to be given to noise in any planning application. The design criteria outlined below are defined in the corresponding noise tables. The values will vary depending on the context, type of noise and sensitivity of the receptor:

- Green – where noise is considered to be at an acceptable level.
- Amber – where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development.
- Red – where noise is observed to have a significant adverse effect.

### Vibration

**Table A: Vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted**

<b>Vibration description and location of measurement</b>	<b>Period</b>	<b>Time</b>	<b>Vibration Levels (Vibration Dose Values)</b>
Vibration inside critical areas such as a hospital operating theatre	Day, evening and night	00:00-24:00	0.1 VDV ms-1.75
Vibration inside dwellings	Day and evening	07:00-23:00	0.2 to 0.4 VDV ms-1.75
Vibration inside dwellings	Night	23:00-07:00	0.13 VDV ms-1.75
Vibration inside offices	Day, evening and night	00:00-24:00	0.4 VDV ms-1.75
Vibration inside workshops	Day, evening and night	00:00-24:00	0.8 VDV ms-1.75

## Proposed Developments likely to be Sensitive to Noise

Special consideration will need to be given to noise sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise likely to have an adverse effect. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced, or likely to be experienced.

**Table B: Noise levels applicable to noise sensitive residential development proposed in areas of existing noise**

Dominant Noise Source	Assessment Location	Design Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Anonymous noise such as general environmental noise, road traffic and rail traffic ~	Noise at 1 metre from noise sensitive façade/free field	Day	<50dBL <sub>Aeq,16hr</sub> *	50dB to 72dBL <sub>Aeq,6hr</sub> *	>72dBL <sub>Aeq,16hr</sub> *
		Night	<45dBL <sub>Aeq,8hr3</sub> <40 dBL <sub>Aeq,8hr</sub> **	45dB to 62dBL <sub>Aeq,8hr</sub> * >40dBL <sub>night</sub> **	>62dBL <sub>Aeq,8hrs</sub> *
	Inside a bedroom	Day	<35dBL <sub>Aeq,16hr</sub>	35dB to 45dBL <sub>Aeq,16hr</sub>	>45dBL <sub>Aeq,16hr</sub>
		Night	<30dBL <sub>Aeq,8hr</sub> 42dBL <sub>Amax,fast</sub>	30dB to 40dBL <sub>Aeq,16hr</sub> 40dB to 73dBL <sub>Amax,fast</sub>	>40dBL <sub>Aeq,8hr</sub> >73dBL <sub>Amax,fast</sub>
	Outdoor living space (free field)	Day	<50dBL <sub>Aeq,16hr</sub>	50dB to 55dBL <sub>Aeq,6hr</sub>	>55dBL <sub>Aeq,16hr</sub>
	Non-anonymous noise	See guidance note on non-anonymous noise			

\*L<sub>Aeq, T</sub> values specified for outside a bedroom window are façade levels

\*\*L<sub>night</sub> values specified for outside a bedroom window are free field levels

The levels given above are for dwellings, however, levels are use specific and different levels will apply dependent on the use of the premises. The Council will also take into account the likely times of occupation for types of development and will be amended according to the times of operation of the establishment under consideration.

## Industrial and Commercial Noise Sources

A relevant standard or guidance document should be referenced when determining values for LOAEL and SOAEL for non-anonymous noise. Where appropriate and within the scope of the document it is expected that British Standard 4142:2014 'Methods for rating and assessing industrial and



commercial sound' (BS 4142) will be used. For such cases a 'Rating Level' of 10 dB below background (15dB if tonal components are present) should be considered as the design criterion).

**Table C: Noise levels applicable to proposed industrial and commercial developments (including plant and machinery)**

Existing Noise sensitive receptor	Assessment Location	Design Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAL (Red)
Dwellings**	Garden used for main amenity (free field) and Outside living or dining or bedroom window (façade)	Day	'Rating level' 10dB* below background	'Rating level' between 9dB below and 5dB above background	'Rating level' greater than 5dB above background
Dwellings**	Outside bedroom window (façade)	Night	'Rating level' 10dB* below background and no events exceeding 57dB <sub>L<sub>Amax</sub></sub>	'Rating level' between 9dB below and 5dB above background or noise events between 57dB and 88dB L <sub>Amax</sub>	'Rating level' greater than 5dB above background and/or events exceeding 88dB <sub>L<sub>Amax</sub></sub>

\*10dB should be increased to 15dB if the noise contains audible tonal elements. (day and night). However, if it can be demonstrated that there is no significant difference in the character of the residual background noise and the specific noise from the proposed development then this reduction may not be required. In addition, a frequency analysis (to include, the use of Noise Rating (NR) curves or other criteria curves) for the assessment of tonal or low frequency noise may be required.

\*\*levels given are for dwellings, however, levels are use specific and different levels will apply dependent on the use of the premises.

The periods in Table C correspond to 0700 hours to 2300 hours for the day and 2300 hours to 0700 hours for the night. The Council will take into account the likely times of occupation for types of development and will be amended according to the times of operation of the establishment under consideration.

There are certain smaller pieces of equipment on commercial premises, such as extract ventilation, air conditioning units and condensers, where achievement of the rating levels (ordinarily determined by a BS:4142 assessment) may not afford the necessary protection. In these cases, the Council will generally also require a NR curve specification of NR35 or below, dependant on the room

(based upon measured or predicted Leq,5mins noise levels in octave bands) 1 metre from the façade of affected premises, where the noise sensitive premise is located in a quiet background area.

## Entertainment Noise

Assessments for noise from entertainment and leisure premises must include consideration to amplified and unamplified music, human voices, footfall and vehicle movements and other general activity. Appropriate metrics must be used to measure and assess the noise impact including LAeq and LMax metrics and appropriate frequency spectrum. Planning permission will not be granted in instances where it is not possible to achieve suitable and sufficient internal noise levels with reference to the most up to date and appropriate guidance within proposed noise sensitive receptors despite appropriate mitigation proposals due to the totality of noise from existing entertainment venues.

**Table D: Noise levels applicable to proposed entertainment premises (customer noise)**

Noise sensitive receptor	Assessment Location	Design Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAL (Red)
Dwellings	Garden used for amenity (free field)	Day	The higher of 55dB LAeq,5min  Or 10dB below existing LAeq,5min  Without entertainment noise	56dB to 60dB LAeq,5min  Or 9dB to 3dB below existing LAeq,5min  Without entertainment noise	The higher of 61dB LAeq,5min  Or 2dB below existing LAeq,5min  Without entertainment noise
Dwellings	Garden used for amenity (free field)	Evening	The higher of 50dB LAeq,5min  Or 10dB below existing LAeq,5min  Without entertainment noise	51dB to 55dB LAeq,5min  Or 9dB to 3dB below existing LAeq,5min  Without entertainment noise	The higher of 56dB LAeq,5min  Or 2dB below existing LAeq,5min  Without entertainment noise
Dwellings	Garden used for amenity (free field)	Night	The higher of 45dB LAeq,5min  Or 10dB below existing LAeq,5min  Without entertainment noise	46dB to 50dB LAeq,5min  Or 9dB to 3dB below existing LAeq,5min  Without entertainment noise	The higher of 51dB LAeq,5min  Or 2dB below existing LAeq,5min  Without entertainment noise

For entertainment and plant noise rating curves should be measured as a 15 minute linear Leq at the octave band centre frequencies.

<b>Room</b>	<b>Noise rating curve</b>	<b>Design period</b>
Bedrooms	NR25	23:00-07:00hrs
All habitable rooms	NR35	07:00-23:00hrs

Advice note: We recommend that you seek advice from the Environmental Health department in advance of any noise surveys on the location of measurements and the nearest noise sensitive receptor. Further detail will be provided in our supplementary planning document Camden Planning Guidance on amenity.

## Appendix 4: Centre frontages

The Council seeks to protect the retail function of town centres by ensuring there is a minimum proportion of premises in A1 retail (shop) use. In addition in some locations the Council seeks to manage the mix and balance of uses, and the impact of food, drink, and entertainment uses by setting maximum proportion of these uses. The proportion of A1 shop and A3, A4, and A5 food, drink, and entertainment uses the Council expect for primary and secondary frontages is set out on the table below. This policy should be read in conjunction with the detailed centre specific guidance in Camden Planning Guidance on town centres and retail.

Centre	Frontage type Displayed on the Policies Map	A1 shops Minimum proportion of A1 shops in each individual frontage	A3 A4 A5 food, drink, and entertainment uses Maximum proportion of A3, A4, and A5 uses combined in each individual frontage	A3 A4 A5 food, drink, and entertainment uses and other non retail uses Other restrictions
<b>Town Centres</b>				
Camden Town	Primary (north)	Min 50%	Max 20%	No more than 2 consecutive non retail uses
	Primary (south)	Min 75%	Max 20%	No more than 2 consecutive non retail uses
	Secondary	Min 50%	-	-
	Sensitive	-	Max 30%	Max 100sqm for food, drink and entertainment uses
West Hampstead	Primary	Min 75%	Max 25%	No more than 2 consecutively in a frontage
	Secondary	Min 50%	Max 25%	No more than 2 consecutively in a frontage
Finchley Road	Primary	Min 75%	Max 20%	-
	Secondary	Min 50%	-	-
Kentish Town	Primary	Min 75%	-	No more than 2 consecutive non retail uses
	Secondary	Min 50%	-	No more than 3 consecutive non retail uses
Kilburn	Primary	Min 75%	-	No more than 2 consecutive non retail uses
	Secondary	Min 50%	-	No more than 3 consecutive non retail uses



<b>Centre</b>	<b>Frontage type</b> Displayed on the Policies Map	<b>A1 shops</b> Minimum proportion of A1 shops in each individual frontage	<b>A3 A4 A5 food, drink, and entertainment uses</b> Maximum proportion of A3, A4, and A5 uses combined in each individual frontage	<b>A3 A4 A5 food, drink, and entertainment uses and other non retail uses</b> Other restrictions
Hampstead	Primary	Min 75%		No more than 2 consecutive non retail uses
	Secondary	Min 50%		No more than 3 consecutive non retail uses
<b>Central London Frontages</b>				
Tottenham Court Road	Primary	Min 80%	-	-
	Secondary	Min 66%	-	-
Holborn	Primary	Min 50%	Max 25%	-
	Secondary	-	Max 40%	-
King's Cross	Primary	-	No further food, drink and entertainment uses	-
	Secondary	-	Max 50%	-
<b>Specialist Retail Areas</b>				
Covent Garden	Primary	Min 80%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
	Secondary	-	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Fitzrovia and South West Bloomsbury	Primary	Min 80%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
	Secondary	-	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses

Centre	Frontage type Displayed on the Policies Map	A1 shops Minimum proportion of A1 shops in each individual frontage	A3 A4 A5 food, drink, and entertainment uses Maximum proportion of A3, A4, and A5 uses combined in each individual frontage	A3 A4 A5 food, drink, and entertainment uses and other non retail uses Other restrictions
Hatton Garden	Primary	No loss of A1 retail	-	-
Museum Street	Primary	No loss of A1 retail	-	-
Denmark Street	Primary	No loss of A1 retail	-	-

Note: The frontage controls apply to each individual frontage, e.g. where the table above states Minimum 75% A1 retail in a primary frontage it means there must be a minimum of 75% A1 shops in each individual primary frontage in that centre, rather than a minimum of 75% of A1 retail in all primary frontages in that centre.

## Neighbourhood Centres

Large-scale retail development (over 1,000sqm) and late night licensed entertainment will generally be inappropriate in Neighbourhood Centres due to the impact of deliveries, noise and customers on residential amenity.

Neighbourhood Centres will be considered suitable locations for food and drink uses of a small scale (generally less than 100sqm) that serve a local catchment, provided they do not harm the surrounding area.”

### Neighbourhood Centres outside of the Central Activity Zone

As a guide the Council will resist schemes that result in:

- less than 50% of ground floor premises being in retail use; or
- more than 3 consecutive premises being in non-retail use.

### Neighbourhood Centres in the Central Activity Zone

<b>Centre</b>	<b>A1 shops</b> Minimum proportion of A1 shops in each individual frontage	<b>A3 A4 A5 food, drink, and entertainment uses</b> Maximum proportion of A3, A4, and A5 uses combined in each individual frontage	<b>A3 A4 A5 food, drink, and entertainment uses and other non retail uses</b> Other restrictions
Brunswick Centre	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Chalton Street	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Cleveland Street	Min 50%	Max 25%	
Drummond Street	Min 50%		Additional food, drink, and entertainment uses acceptable subject to the assessment of impacts.
Eversholt Street (North and South)	Min 50%		Additional food, drink, and entertainment uses acceptable subject to the assessment of impacts.
Goodge Street	Min 50%	Max 25%	
Lamb's Conduit Street	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Leather Lane	Min 50%	Max 25%	
Marchmont Street / Leigh Street / Tavistock Place	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Store Street	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses



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