

**Statement of Common Ground
between the London Borough of
Camden and Transport for
London concerning the Camden
Local Plan Proposed Submission
Draft**

9 December 2025

1. Introduction

- 1.1 This document is a Statement of Common Ground between the London Borough of Camden and Transport for London, and concerns planning policies included in the Camden Local Plan Proposed Submission Draft at the Regulation 19 stage.
- 1.2 It has been prepared to demonstrate that Camden's Local Plan Proposed Submission Draft is 'based on effective joint working on cross boundary strategic matters' throughout the plan preparation period in accordance with Paragraph 36 of the National Planning Framework (NPPF) and will inform further engagement to ensure effective implementation of Local Plan policies.
- 1.3 It focusses on the matters raised by Transport for London in their response to consultation on the Camden Local Plan Proposed Submission Draft. It highlights matters where agreement has been reached between the Council and Transport for London, and areas where agreement has not yet been reached.
- 1.4 In the spirit of collaboration, the document has been prepared as a 'live' document, which can be updated as matters progress and agreement is reached on outstanding issues. It therefore includes details on mechanisms for monitoring, reviewing and updating the Statement of Common Ground.
- 1.5 The London Borough of Camden is reviewing its Local Plan to ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics. The Council published the Camden Local Plan Proposed Submission Draft for comment in May - June 2025. The draft Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this.
- 1.6 Transport for London (TfL) on behalf of the Mayor of London provided a response to the Camden Local Plan Proposed Submission Draft on 26 June 2025.
- 1.7 In London, planning and co-operation on strategic matters relating to transport generally take place at the Londonwide level, with more locally specific matters covered in Local Plans. The Mayor of London is responsible for producing the London Plan, which sets out the strategic vision for the development of London over the next 20-25 years. The London Plan sets out the Mayor's strategic approach to transport and also includes a number of more detailed transport policies.
- 1.8 Further to this, the Mayor of London is also responsible for producing a Londonwide Transport Strategy. The [Mayor's Transport Strategy](#) sets out plans to transform London's streets, improve public transport and create opportunities for new homes and jobs.

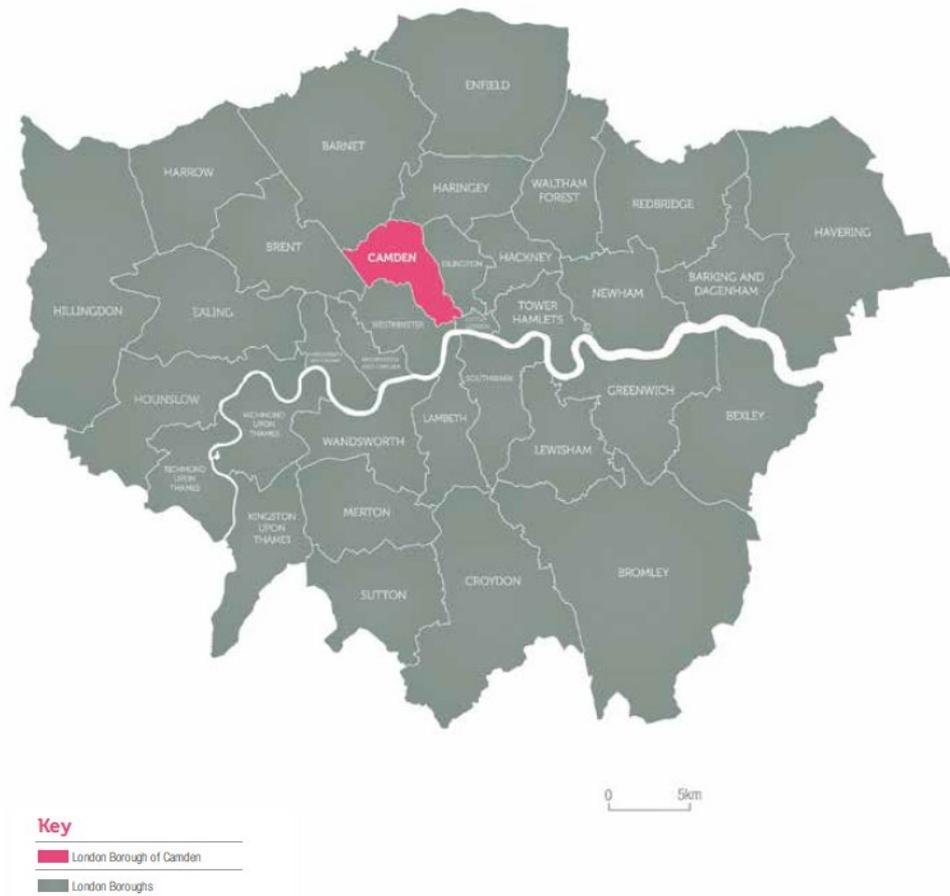
- 1.9 In order to implement the Mayor's Transport Strategy at a borough level TfL partner with individual London borough's. To support the delivery of the Mayor's Transport Strategy Camden are required to produce a Local Implementation Plan, which is agreed with TfL. This sets out details of transport infrastructure changes over a three year period to support the Mayor's Transport Strategy. Camden's latest [Local Implementation Plan](#) was agreed with TfL in March 2025.

2. Strategic Geography

- 2.1 The parties to this SoCG are the London Borough of Camden and Transport for London.

London Borough of Camden

- 2.2 Camden is a diverse inner London Borough with a population of approximately 215,000. Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. The southern portion forms part of the Central Activities Zone (CAZ) and includes Bloomsbury and Holborn, which neighbour the West End and City of London. Further north the character changes with many residential areas and neighbourhoods, including Camden Town, Hampstead, Highgate, Swiss Cottage, West Hampstead and Kentish Town, each with their own distinctive identity and characteristics. The character of the borough is also shaped by its topography and by significant parks and open spaces including Hampstead Heath and Primrose Hill.
- 2.3 London Borough of Camden is bordered by six other London boroughs: City of London, Westminster City Council, London Borough Brent, London Borough Barnet, London Borough Haringey and London Borough Islington.



Transport for London

- 2.4 Transport for London (TfL) is the transport operator and highway authority for the whole of London and is the integrated transport authority responsible for the implementation of the Mayor’s Transport Strategy. The Transport Strategy 2018 aims to achieve an 80 per cent sustainable mode share target across London by 2041 and uses the ‘Healthy Streets Approach’ and Vision Zero with overarching aim of enabling more people to travel by walking, cycling and public transport. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. A list of TfL’s assets in Camden is set out on their [website](#).

3. Key Strategic Matters

- 3.1 Many of the strategic matters and key issues to be addressed through compliance with the duty to co-operate are, in London, a matter for the London Plan and addressed through the preparation of the London Plan. The London Plan is part of the development plan for all planning authorities in London and Local Plans prepared by London boroughs are required to be in general conformity with it.
- 3.2 As strategic transport matters for London are covered by the London Plan, to which Transport for London are a key stakeholder, and Camden and other

boroughs engage with the preparation of the London Plan, it is considered that in the context of the Camden Local Plan Proposed Submission Draft, there are no outstanding strategic transport matters to be addressed through the Duty to Co-operate.

- 3.3 Officers from Camden's Planning and Transport Services and TfL's Spatial Planning team have quarterly liaison meetings, providing an opportunity for strategic transport matters to be discussed. The Council also has regular meetings with TfL to discuss the Euston Area Plan and TfL have not raised any concerns in relation to the Local Plan and strategic transport matters at these meetings.
- 3.4 There are no strategic matters in relation to the Camden Local Plan Proposed Submission Draft upon which TfL have any concerns. Camden have engaged with TfL in an appropriate, proportionate and effective manner throughout the preparation of the Local Plan and TfL are satisfied that the Duty to Co-operate has been met. It is therefore appropriate for this SoCG to focus on areas of agreement and disagreement between Camden and Transport for London in respect of the matters raised by TfL in their response to the consultation on the Plan, which are non-strategic in nature.

Matters where the parties agree or disagree

- 4.1 The table below sets out the matters raised by Transport for London in their representation on the Camden Local Plan Proposed Submission Draft (Regulation 19), and the status of those representations.
- 4.2 The table seeks to provide clarification and clarity to the extent to which matters raised by Transport for London are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between London Borough of Camden and Transport for London.

Relevant section of the Camden Local Plan Proposed Submission Draft	TfL comment on the Camden Local Plan Proposed Submission Draft	Camden Response	Common Ground Agreed?
Whole Plan	<p>The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.</p> <p>We therefore welcome policies, alongside the amendments made in response to our Regulation 18 Comment, in the draft Local Plan as these support shifting journeys to sustainable modes and exceed London Plan requirements for car parking and cycle parking. We particularly commend the Council for continuing to have a requirement for car-free development across the borough which continues to set an example for other well-connected local planning authorities in London. We welcome support for public transport and active travel improvements and requirements for developments to contribute to transport infrastructure where appropriate.</p> <p>The Sustainable Transport, Walking and Cycling London Plan Guidance, published in November 2022 provides additional detail on the preparation of development plans to be in line</p>	Support welcome.	Agreed. Subject to the proposed modifications set out below.

	<p>with Chapter 10 of the London Plan. For the benefit of clarity and to be consistent with the Sustainable Transport, Walking and Cycling London Plan guidance, we continue to encourage the Council to include a map of the planned and aspirational walking and cycling networks, as well as other transport improvements needed to support the plan. The Camden Town station capacity upgrade remains a project of strategic importance given it is an essential enabling component of a future Northern line upgrade, which would facilitate more than the current 24 trains per hour. We therefore encourage the Council to carefully consider how the policies and site allocations in the plan could make the most efficient use of land to help deliver this upgrade alongside step-free access.</p> <p>We encourage the Council to make clear in the draft Plan where and how bus infrastructure, including priority measures, will be enhanced to support the efficient operation of the bus network and improved journey times. Relevant site allocations should be more specific with infrastructure requirements to protect access to the bus network and enhance infrastructure as part of development and design principles, linked to achieving sustainable mode share targets.</p> <p>Furthermore, the council should make clear the process of Crossrail 2 safeguarding limits and outline how this might affect development of safeguarded sites within the relevant site allocations.</p> <p>We have a number of detailed Comment and</p>		
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	suggestions for amendments on specific policies, area plans and site allocations. These are included in the table in appendix A, below.		
Whole Plan	Our comments made in response to the Regulation 18 consultation remain valid. We would like to reiterate our comments on setting out specific objectives to enhance bus infrastructure through policy. For relevant policies, we encourage the council to include maps outlining proposed walking and cycle routes for clarity. This includes Policy S1 South Camden, Policy C1 Central Camden, Policy W1 West Camden, Policy T2 Prioritising Walking, Wheeling and Cycling.	We consider that the Plan clearly sets out the Council's approach to enhancing bus infrastructure in Policy T3 Public Transport and relevant site allocation policies. We do not consider it necessary or appropriate to include detailed walking and cycling maps in the Local Plan. These are available to view online on the Council's website.	We believe inclusion or signposting of such maps would aid the effectiveness of the plan as a whole and for securing planning obligations and is set out as a requirement of the Sustainable Transport, Walking and Cycling LPG.
Policy S1 South Camden	The Council should make the safeguarding limits, including sites of surface interest, clear within the relevant area policies of the draft Plan. We note that the safeguarding directions are now clearly stated in the relevant site allocations, except where stated below.	Policy T1 Safe, Healthy and Sustainable Transport states that the Council will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure projects. Local Plan Transport Safeguarding Areas, HS2 Phase 1 Safeguarding and HS2 Homeowner Protection Zones are then designated on the Policies Map. Given this we do not consider that it is necessary to also add reference to this into Policy S1 South Area.	Agreed, subject to the following modification to part A (6) of Policy T1 Safe, Healthy and Sustainable Transport: provide additional text at the end so that it reads 'safeguarding of strategic infrastructure projects, including Crossrail 2' for clarity and to aid the effectiveness of the plan and safeguarding directions. The LB Camden confirm that they agree to the proposed modification and plan to update the Schedule of Proposed Modifications accordingly.

<p>Policy S1 South Camden</p>	<p>Developments above running tunnels should carefully consider foundation design to ensure that there is a pile free corridor that will allow us to build Crossrail 2 tunnels in the future. Development designs should ensure that the building will not be compromised by the future tunnels and that any future occupiers will not experience noise and vibration from the future operation of Crossrail 2. In these circumstances, development can usually proceed but the developer will need to discharge our recommended Crossrail 2 conditions (if recommended) that ensure the foundation design meets these criteria.</p>	<p>Comment noted. This is a consideration for the planning application process, rather than a matter for the content of the Local Plan.</p>	<p>Agreed.</p>
<p>Policy S1 South Camden</p>	<p>While the Council may wish to address Crossrail 2 safeguarding through a separate policy which covers the whole borough, much of the Crossrail 2 safeguarding Limits are Located within the South Camden area. We would recommend Crossrail 2 safeguarding to be referenced in this policy.</p>	<p>We consider that the Plan clearly sets out the Council’s approach to this in Policy T1 Safe, Healthy and Sustainable Transport and relevant site allocation policies. It is therefore not considered necessary to include an additional reference to Crossrail safeguarding in Policy S1.</p>	<p>Agreed, subject to the following modification to part A (6) of Policy T1 Safe, Healthy and Sustainable Transport: provide additional text at the end so that it reads ‘safeguarding of strategic infrastructure projects, including Crossrail 2’ for clarity and to aid the effectiveness of the plan and safeguarding directions.</p> <p>The LB Camden confirm that they agree to the proposed modification and plan to update the Schedule of Proposed Modifications accordingly.</p>

Policy S1 South Camden	Part U Infrastructure Part I - We welcome the council's continued support for HS2 and station improvements at Euston as detailed further in the new Policy S2 Euston area. For consistency with the Euston Area Plan and ongoing discussions with the DfT, the policy should make clear that improvements are needed for other transport infrastructure at Euston such as the Underground station and bus station. We recommend the following modifications to part I of the policy for effectiveness: 'The delivery of a new High Speed 2 station and mainline station improvements at Euston, <u>alongside improvements to other supporting public transport and active travel infrastructure serving the station.</u> '	Agree that the suggested text would add clarity. Propose the following modification to Policy S1, Part U1 - "The delivery of a new High Speed 2 station and mainline station improvements at Euston, <u>alongside improvements to other supporting public transport and active travel infrastructure serving the station.</u> "	Agreed.
Policy S1 South Camden	Part 2 - For consistency with the proposals of the Euston Healthy Streets programme, we recommend the following edits for clarity: 'The transformation of Euston Road <u>in accordance with Euston Healthy Streets</u> and the removal of the King's Cross gyratory.'	Agree that the suggested text would add clarity. Propose the following modification to Policy S1, Part U2 - "The transformation of Euston Road <u>in accordance with Euston Healthy Streets</u> and the removal of the King's Cross gyratory."	Agreed.
Policy S1 South Camden	Part 9 - We welcome the amendments made to the policy to reflect the potential need to reinstate four tracks and a third platform on the North London Line to meet future passenger and freight demand.	Support welcome	Agreed.
Policy S1 South Camden	The policy also has the opportunity to set out proposals more generally to improve bus infrastructure and journey times.	We consider that the Plan clearly sets out the Council's approach to this in Policy T3 Public Transport and relevant site allocation policies. It is therefore not considered	Agreed.

		necessary to include an additional reference in Policy S1	
Policy S2 Euston Area	Welcome the new policy, particularly in emphasising the importance of delivering an improved and integrated transport interchange at Euston as well as seeking connectivity improvements within the area and to surrounding areas of the borough.	Support welcome.	Agreed.
Site Allocation Policy S5 120–136 Camley Street	Part 11 - We welcome the amendments outlining the provision of a new public space that facilitates a coordinated route along the boundary with Agar Grove Estate, enhancing connectivity for pedestrians and cyclists along Carnley Street. We note, however, that parts 11.a and 11.b of the policy appear to be duplicates.	Support welcome. Propose the following modification to Site Allocation S5 Criterion 11 b - 11. contribute towards public realm and connectivity enhancement projects along Camley Street, to strengthen it as a key route for all cyclists and pedestrians, through: a. the provision of a new public space and urban greening to improve the entrance from Agar Grove and the approach from the south under the adjacent bridge. This should include a coordinated route along/across the boundary with Agar Grove Estate (site S21); b. the provision of a new public space and urban greening to improve the entrance from Agar Grove and the approach from the south under the adjacent bridge. This should include a coordinated route along/across the boundary with Agar Grove Estate (site S21);	Agreed.

Site Allocation Policy S5 120–136 Camley Street	Part 12 - We welcome the addition that development will be expected to contribute towards improved access to bus services on Agar Grove.	Support welcome.	Agreed.
Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate	We note the new requirement in Site Allocation 5 for development to contribute towards improved access to bus services. As per our Reg. 18 comments, this should be extended to this site allocation as well.	Propose the following modification to Site Allocation S6 to insert a new criterion - <u>“(19) - seek to contribute towards improved access to bus services in the local area.”</u>	Agreed.
Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate	Part 18 - We welcome the requirement for development in this site allocation to contribute towards a new canal crossing to improve connectivity between King's Cross, Carnley Street and St. Pancras Way.	Support welcome.	Agreed.
Site Allocation Policy S12 Belgrove House	We welcome the amendments made in line with our response to the Regulation 18 consultation, including that TfL is a key consultee for the site due to its status as a site of surface interest.	Support welcome.	Agreed.
Site Allocation Policy S12 Belgrove House	Part 6 - The policy should make clear that an integrated, step-free entrance to Kings Cross St Pancras station should be delivered as works in kind and secured through an appropriate planning obligation.	Integrated step-free entrance has been secured in the permitted scheme, which is under construction. No change to the wording is considered necessary.	Agreed.
Site Allocation Policy S15 Land to the rear of the British Library	Parts 8 & 9 - We welcome the amendments made to the policy, in line with our response to the Regulation 18 consultation.	Support welcome.	Agreed.
Site Allocation Policy S15 Land to the rear of the British Library	We would like to reiterate that any future proposals for this for the site would need to have a contribution secured towards a new Cycle Hire station commensurate with the scale of development. We recommend that this is clearly	Any future contribution towards a cycle hire station would be assessed at the planning application stage against relevant transport policies. It is not considered	Agreed.

	stated, as written in our regulation 18 comments, under 'infrastructure requirements' of the site allocation.	necessary to add a specific reference in allocation S15.	
Site Allocation Policy S17 Selkirk house, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street	Part 5 - We welcome the clarification that development must remove existing on-site car parking, in line with the London Plan Policy T6 and the Council's car free approach set out in the Local Plan Policy TS	Support welcome.	Agreed.
Policy C1 Central Camden	Part O - Infrastructure, Part I - We welcome the amendments made to include Chalk Farm station as a priority for step-free access. It should be noted however that further investigation internally has found that it will be exceptionally challenging to deliver step-free access at this station. While there may still be an opportunity to do so, it will be dependent on providing access from Site Allocation C8 Former Morrisons petrol filling station.	Support welcome. Comment noted.	Agreed.
Policy C1 Central Camden	Part O, 2 - We welcome the amendments made to include capacity upgrades at Camden Town Underground station in light of existing capacity constraints.	Support welcome.	Agreed.
Policy C1 Central Camden	Part O, 3 - We welcome the amendments made to the policy to reflect the potential need to reinstate four tracks and a third platform on the North London line to meet future passenger and freight demand.	Support welcome.	Agreed.
Site Allocation Policy C2 Regis Road and Holmes Road depot	We welcome the further requirement to explore north-south permeability across the railway.	Support welcome.	Agreed.

<p>Site Allocation Policy C3 Murphy Site</p>	<p>Our comments made in response to the Regulation 18 consultation remain valid. The site allocation should clearly set out in that funding for a feasibility study may be required for improvements to Gospel Oak station</p>	<p>The policy seeks a financial contribution towards improvements at Gospel Oak station, which could include funding a feasibility study. No change is considered necessary</p>	<p>Our preferred approach is to make clear anticipated requirements of a given site, where possible, to provide clarity and predictability to applicants.</p>
<p>Site Allocation Policy C5 369-377 Kentish Town Road</p>	<p>Part 6 - Our comments made in response to the Regulation 18 consultation remain valid. We recommend the following edits for clarity: 'contribute towards the relocation <u>and enhancement</u> of the bus shelter, <u>in collaboration with Transport for London</u>, to improve passenger and pedestrian safety, consistent with aspirations for a new Kentish Town Square. <u>Any relocated bus shelter should include real time passenger information.</u>'</p>	<p>The additional detail suggested is not considered necessary.</p>	<p>Noted. The purpose of the proposed modification is to make clear that the existing bus shelter will not meet the needs of future development and an improved bus stop is necessary. We would support a more concise modification that makes this core purpose clear.</p>
<p>Site Allocation Policy C7 Morrisons Supermarket</p>	<p>Our comments made in response to the Regulation 18 consultation remain valid. Part 13 - We do not support permanent off-site bus standing facilities due to the increased operational costs that will be difficult to recover in the long-term, we therefore recommend the following modifications to the policy: 'including the practicality of alternative locations outside the site. <u>Permanent bus standing facilities should be provided on-site, and any off-site provision should be temporary and for the duration of the works. Details of bus standing facilities are subject to agreement with TfL.</u> Furthermore, the policy should state <u>'Development must contribute to any additional costs associated with rerouting of additional bus services to serve the development or alternative bus standing locations.'</u></p>	<p>Part 13 does not require off-site standing facilities. The wording is considered appropriately flexible for a solution to be agreed with all relevant stakeholders.</p>	<p>Noted – a core requirement for bus operations in this area is that on-site bus standing is provided in this location and this should be reflected in the site allocation. Alternatives would lead to increased operational expenditure which would not be sustainable.</p>

Site Allocation Policy C10 Juniper Crescent	We note that the part 11 of policy does require car parking to 'be designed to allow for repurposing when no longer required'. We recommend the policy is modified as follows for clarity: '...be designed to allow for repurposing when no longer required <u>existing residents move out or permits are given up</u> ; and'	The current wording is considered to be sufficiently clear. No change to the wording is considered necessary.	Not agreed. 'No longer required' is vague and allows for the potential that car parking spaces continue to be used after existing residents move out.
Site Allocation Policy C11 Network Rail land at Juniper Crescent	We would like to reiterate our previous comments that a new bus turning area is likely to come with constraints that would need careful planning in collaboration with Transport for London to ensure the changes do not have negative impacts. We recommend this is reflected in the site allocation. We suggest the following edits to part 8 of the policy: 'An operational area within the site could, for example, support a bus turning area at the end of the existing access road <u>in conjunction with the reprovision of stand spaces for five buses with independent bus movements, new bus stops for resident access, and TfL-specified welfare facilities for bus drivers.</u> '	The additional detail suggested is not considered necessary.	Agreed.
Site Allocation Policy C12 Gilbeys Yard	Part 9 of the policy should be modified to state, 'rationalise parking on-site in Line with Policy T5 (Parking and Car Free Development), <u>be designed to allow for repurposing when existing residents move out or permits are given up and reduce vehicular dominance;</u> ' to ensure the development complies with London Plan car parking standards in future.	The current wording is considered to be sufficiently clear. No change to the wording is considered necessary.	Proposed modification seeks to ensure consistency with other site allocations and in line with our preferred text.
Site Allocation Policy C13 West Kentish Town Estate	We welcome the addition of part 8 of the policy, however it should be modified to state, 'where existing residents parking is reprovided, this should be located to <u>minimised car movements within the site</u> , and be -designed to allow for	Support welcome. The current wording is considered to be sufficiently clear. No change to the wording is considered necessary.	Not agreed. 'No longer required' is vague and allows for the potential that car parking spaces

	repurposing when no longer required <u>existing residents move out or permits are given up.</u> '		continue to be used after existing residents move out.
Site Allocation Policy C15 Wendling Estate and St Stephens Close	We welcome the addition of part 6 of the policy, however it should be modified to state, 'where existing residents parking is reprovided, this should be located to minimised car movements within the site , and be -designed to allow for repurposing when no longer required <u>existing residents move out or permits are given up.</u> '	Support welcome. The current wording is considered to be sufficiently clear. No change to the wording is considered necessary.	Not agreed. 'No longer required' is vague and allows for the potential that car parking spaces continue to be used after existing residents move out.
Site Allocation Policy C17 Camden Town over station development	In line with our comments on Policy C1 Central Camden, we encourage the Council to consider how to make most efficient use of land as part of this site to help deliver the Camden Town station capacity upgrade and step-free access. While a development on this site will be unlikely to deliver the station upgrade on its own, any development coming forward on this site should contribute towards the delivery of this scheme and development on this site may need to deliver works in kind for a new ticket hall and station box insofar as ensuring the full station upgrade can be delivered as and when funding is available. Any development on this site should additionally not preclude the delivery of the station capacity upgrade. Developments in the surrounding area should also provide a financial contribution towards the delivery of the station upgrade. While we acknowledge the desire to provide step-free access and capacity improvements to Kentish Town and Chalk Farm stations, we encourage the Council to prioritise Camden Town station for developer contributions.	Comment noted	Agreed.

Policy W1 West Camden	Part L Infrastructure, Part I - We welcome the modifications to highlight capacity improvements to the stations.	Support welcome.	Agreed.
Policy W1 West Camden	Part L, 5 - We strongly welcome the additional priority for improving the interchange experience both between the three West Hampstead stations and in relation to the surrounding bus, pedestrian and cycle network.	Support welcome.	Agreed.
Site Allocation Policy W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road	Part 16 - We welcome the requirement for development to be supported by a bus infrastructure plan to deliver improvements to bus stop facilities both with, and in the vicinity of, the site.	Support welcome.	Agreed.
Policy N1 North Camden	Part F - We welcome the cross referencing of the Camden Transport Strategy and Cycling Action Plan within the policy.	Support welcome.	Agreed.
Site Allocation Policy N4 Hampstead Delivery Office	To ensure the Site Allocation complies with London Plan Policy T6, an additional part 4 of the policy should be added: ' <u>Development must be car free, except for Royal Mail operational parking.</u> '	Any redevelopment of the site would be expected to be in accordance with Policy T5 (Parking and car free development), and should therefore be car free except for essential operational or servicing needs. No additional wording in Policy N4 is therefore considered necessary.	Agreed.
Policy H9 Purpose built student accommodation	Our comments made in response to the Regulation 18 consultation remain valid. For clarity, para. 7.299 should be modified to state, ' <u>Funding A contribution towards public transport and other services may be sought through planning obligations as appropriate where there is deemed to be insufficient capacity or connectivity.</u> '	Further details of the Council's approach to securing planning obligations to support transport projects is set out in the transport policies in the Plan and in the Delivery and Monitoring chapter. No additional wording is considered necessary under policy H9.	Agreed.

Policy D6 Basements	We note that the policy requires developments to demonstrate that any basement development would not cause harm to neighbouring properties. This should also include London Underground infrastructure.	Agree that clarification in A(1), that it is intended to include infrastructure, would be helpful. Propose the following modification to Policy D6 Part A.1 - "neighbouring properties <u>and infrastructure</u> ".	Agreed.
Policy T1 Safe, healthy and sustainable transport	Paragraph 14.4 - We welcome the references made to the Mayor's Vision Zero strategy and Healthy Streets Approach, alongside the council's LIP target of 93 per cent of all journeys in Camden to be made by sustainable modes by 2041.	Support welcome.	Agreed.
Policy T2 Prioritising walking, wheeling and cycling	We welcome the measures in this policy which are in alignment with the London Plan and the Sustainable Transport, Walking and Cycling LPG. We recommend including the maps of the planned walk and cycle networks as part of the supporting text.	Support welcome. We do not consider it to be necessary or appropriate to include detailed walking and cycling maps in the Local Plan. These are available to view online on the Council's website.	We believe inclusion or signposting of such maps would aid the effectiveness of the plan as a whole and for securing planning obligations and is set out as a requirement of the Sustainable Transport, Walking and Cycling LPG.
Policy T3 Public transport	We note that Part A of the policy has been modified to state 'bus infrastructure' in lieu of listing relevant bus infrastructure. It would aid the effectiveness and clarity of the policy to reinstate the list, including the proposed additions in our response to the Regulation 18 consultation as part of the supporting text.	We consider that the Plan clearly sets out the Council's position in relation to this. The suggested amendment is not considered necessary.	Agreed.
Policy T3 Public transport	Paragraph 14.30 - We strongly welcome the addition that passenger transport interchange facilities should be designed and delivered in accordance with Transport for London's Interchange Best Practice Guidelines.	Support welcome.	Agreed.

Policy T4 Shared transport infrastructure and services	Our comments made in response to the Regulation 18 consultation remain valid. While car clubs are potentially able to reduce car use and ownership in areas which currently have high rates of car ownership (when paired with a reduction in general car parking), the opposite is potentially true in areas which have low rates of car ownership. This could ultimately have the opposite of the desired effect to restrain car use in parts of Camden, particularly should car clubs become readily available on demand.	Comment noted	Agreed.
Policy T5 Parking and car-free development	Part A - We welcome the amendments made in Line with our response to the Regulation 18 consultation.	Support welcome	Agreed.
Policy T5 Parking and car-free development	Part 6 - As per our Regulation 18 comments, we would like to reiterate that the wording of the policy should be clarified as follows: ' <u>where residential estates are redeveloped</u> , reduce on-site parking, as far as possible, <u>with a land for the redeveloped site to eventually be car free as part of re-development schemes</u> .' The London Plan is clear that where sites are redeveloped the most up to date parking standards should be applied. The car free requirement of this Local Plan policy should be applied to all residential and commercial redevelopments except where existing residents with entitlements to parking permits are rehoused as part of an estate redevelopment. The amended wording would be consistent with paragraph 14.48.	We consider that the Plan clearly sets out the Council's position in relation to this. The suggested amendment is not considered necessary.	Noted. Part L of London Plan Policy T6 Car Parking which requires that the current approach is followed and London Plan standards are not exceeded where sites are redeveloped. The proposed modification would ensure a more consistent approach with the London Plan and aid the efficacy of the draft Local Plan's policy.
Policy T6 Sustainable movement of goods, services, and materials	Part A.5 - We welcome the amendments made to the priority order in line with our response to the Regulation 18 consultation.	Support welcome	Agreed.

<p>Policy T6 Sustainable movement of goods, services, and materials</p>	<p>Part B.3 - The comments made in our response to the regulation 18 consultation remain valid. We would like to reiterate our point on the consistent use of the terms Construction Logistic Plans and Delivery Servicing Plans throughout the Local Plan to provide better clarity for readers. This is in accordance with the London Plan and TfL Guidance.</p>	<p>Construction Logistics Plans form part of a Construction Management Plan. The Local Plan refers to both Construction Management Plans and Delivery and Servicing Plans. These are terms that have been in use in Camden for a number of years and which stakeholders are familiar with. Given this, we do not consider it necessary or helpful to change how we refer to these documents.</p>	<p>Agreed.</p>
<p>Policy T6 Sustainable movement of goods, services, and materials Paragraph 14.58</p>	<p>Paragraph 14.58 - We welcome the clarification that any cycle infrastructure to support cargo bike usage should be provided in addition to wide-spaced Sheffield stands for non-standard cycles.</p>	<p>Support welcome</p>	<p>Agreed.</p>
<p>Policy DM1 Delivery and monitoring</p>	<p>Welcome the amendments made in Line with our response to the regulation 18 consultation.</p>	<p>Support welcome.</p>	<p>Agreed.</p>

5. Governance arrangements

- 5.1 This Statement has been prepared as a 'living' document, which will be reviewed and updated:
- whenever agreement is reached on any outstanding matters; or
 - at key stages in the plan-making process, as the Plan progresses through examination.
- 5.2 Specific officer-level meetings to discuss cross-boundary issues will continue to be held on a regular basis, together with attendance at sub-regional or London wide group and partnership meetings where cross boundary issues are discussed.
- 5.3 Officers in each authority will feed back to senior officers any relevant issues raised in discussions. Likewise, any senior level discussions on relevant cross-boundary issues will inform discussions on strategic planning matters.

Signatures

Signed on behalf of London Borough of Camden

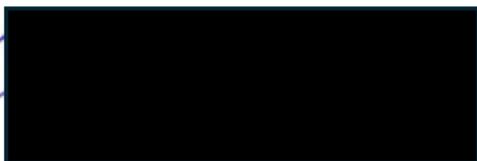
R. Burden

Rebecca Burden

Development Plans Manager

9 December 2025

Signed on behalf of Transport for London



Josephine Vos

London Plan & Planning Obligations manager

9 December 2025

Appendix 1 – Consultation Responses from TfL



TfL Ref: CMDN/20/12

London Borough of Camden
planningpolicy@camden.gov.uk

Transport for London
City Planning
5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

27/03/2020

Dear Sir/Madam,

Re: Camden Site Allocations Review

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made by TfL with regard to its role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Property to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on Camden's draft site allocation review. Given the advanced stage of the draft London Plan in the adoption process – with the Intend to Publish version now available on the [GLA website](#) – we will have regard to it when assessing and responding to local planning policy consultations, including Camden's draft site allocations review. We also note that the Mayor has received direction from the Secretary of State and is currently considering his response.

New development should be delivered in line with relevant draft London Plan policy and the aims set out in the Mayor's Transport Strategy (MTS). In particular, the approach taken at individual sites should reflect the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. We therefore strongly support site requirements and development guidelines that prioritise walking, cycling and using public transport in the location and design of new development and associated public realm. We will continue to work closely with

the Mayor and Camden to identify the improvements needed to support mode shift and growth. We will also continue to provide strong justification for investment in transport capacity and connectivity.

We welcome the support the document provides for walking and cycling, both through setting out Camden's overarching policy approach (including the requirement for car-free development) and through references to improving pedestrian and cycle permeability at most of the sites listed. Opportunities to support improvements in line with the Healthy Streets Approach should be taken as far as possible at all sites.

It is important that alongside improvements to walking and cycling, public transport is also supported. We would welcome references to the need for street improvements to also support bus operations including journey time and reliability. Where developments are located close to London Underground or London Overground infrastructure, these should not compromise the operation or necessary enhancement of these services. This may involve mitigation in the design of sites (for example to reduce the transmission of noise) or the restriction of certain development at certain sites. Similarly all proposals should avoid generating any negative impact on bus infrastructure including stops and stands.

Comments and suggestions relating to specific draft site allocations proposed are set out in more detail in the Appendix below.

Yours faithfully,

Josephine Vos | Acting Manager
London Plan and Planning Obligations team | City Planning
Email: [REDACTED]



Appendix: Comments from TfL on specific site allocations

Knowledge Quarter Innovation District

- We generally support the proposals for the Knowledge Quarter, in particular policy h) which states that new development within the Knowledge Quarter district will need to 'contribute to relevant infrastructure improvements, including to pedestrian and cyclist movement within, around and across the Euston Road corridor'.
- We are currently progressing a Healthy Streets scheme for this location, and it will be important that developments in the area contribute if improvements are going to be delivered. Wording could potentially be expanded to explicitly cover contributions towards design development as well as implementation, and for developers to actively consider ways they could limit their impact on Euston Road e.g. through innovative servicing strategies which make use of consolidation centres or out of hours deliveries etc.

Bloomsbury Campus

- We generally support the proposals being put forward, and the strong emphasis being put on improving walking and cycling connections and open space. In the context, we would question if there is any merit in expanding policy e) around delivering 'sustainable growth' to include specific measures around servicing. The area includes a number of major buildings which fall under a single landowner (UCL) so there is a question around there are opportunities to further limit their servicing impact such as by adopting collaborative and innovative approaches. This also has links to the 'Knowledge Quarter' policies, as making any radical changes to Euston Road in the future is likely to require a reduction in traffic, so nearby areas should be taking measures to help support this.
- Similarly, the document references improving east-west links and walking and cycling routes to integrate with the West End Project. While we support this, we would suggest there may also be merit in improving north-south links to Gordon Street (and beyond) in particular, given that the northern end is due to be pedestrianised under HS2 and there will be new and improved connections across Euston Road and into Euston station

Camden Goods Yard area

- We generally support the transport related policies contained in CGY1 – new development should however also have regard to the impact they may have on nearby London Underground stations, namely Camden Town and Chalk Farm. While we support the introduction of measures to support walking and cycling, care should be taken to avoid any significant negative impacts on bus operations, including bus journey times and reliability.
- Policy CGY2 (g)- deliveries and servicing will remain important in the future if the site is to remain a supermarket. The policy could potentially be more explicit about the need to identify innovative ways to support such activities on-site. Buses provide an important form of public transport and their continued provision should be seen as integral to the re-development of the site. By 2020 all buses will meet or exceed Euro VI emission standards and by

2037 at the latest all buses within the M25 will be zero emission. As such, the impact from buses will naturally be lower in the future as they will be quieter and generate lower emissions.

- Policy CGY2 (h) refers to exploring the relocation of bus services. While we are open to discussion on this topic, we would want to avoid any disproportionate negative impacts, particularly for those reliant on a service to access work or those less physically mobile. Any proposed changes would need to meet customer demand, enable efficient interchange with other modes where relevant and have a minimal impact on bus operations and customer experience were they to be considered in detail. Any changes that would have a negative financial impact would need to be fully funded by the developer.
- Para- 5.41- The presence of suitably located bus-stands are essential for operating the bus network and we would object to any proposal to relocate/ remove any bus-stands without a suitable alternative location being agreed (in line with draft London Plan policy T3 Transport capacity, connectivity and safeguarding). It is also imperative that bus-stands are provided off-street wherever possible to provide greater security of tenure. Any increases to operating costs as result of bus-stands being re-located would need to be fully funded by the developer.
- Policy CGY5(f) and Para 5.76- Same comments as above (policy CGY2 (h) and Para 5.41) in relation to buses apply.

Camley Street and St Pancras Way

- Policy CSP1 c) – we support reference to new development contributing to new and improved pedestrian and cycle links. We recommend this is extended to also include reference to contributing towards bus improvements to support new development where necessary
- Policy CSP1 f) – we welcome proposals to minimise the servicing impact of new developments.

Holborn and Covent Garden

- Para 7.4- This paragraph will need to be updated to be in line with the new London Plan, which underwent its Examination in Public (EiP) last year and is nearing adoption. For example, Table 2.1 identifies indicative capacity at Tottenham Court Road for 300 homes and 6,000 jobs.
- We support the policies in HCG1, in particular (f) which seek contributions from new development towards a safe and attractive network of routes for pedestrians and cyclists. It also makes reference to reducing traffic dominance, however if this is to be achieved we would recommend that specific measures that developments are expected to deliver/contribute towards to support this are also referenced within the policy e.g. servicing initiatives
- We support the reference to the Liveable Neighbourhoods programme.

Kentish Town

- We are currently working with the London Borough of Camden to progress new strategic cycle routes, as set out in TfL's Cycling Action Plan (Dec 2018) and LB Camden's Cycling Action Plan (April 2019), including a number of routes that connect to Kentish Town and the surrounding area. To support the growing

cycle network serving Kentish Town, TfL recommends policy support for more cycle parking along the current and future cycle network, not only within developments but outside stations and other key destinations within Kentish Town. The area also plays an important role for industry/logistics, and it is important that Vision Zero is at the heart of providing new cycle routes to allow both cycling and industrial activity to take place safely.

- Other initiatives to improve cycling within Kentish Town that the document could consider are:
 - More location-specific interventions that help overcome severance for walking and cycling caused by major roads and railways, i.e. better crossings
 - Neighbourhood-scale traffic management, especially through local roads, to minimise through-movement by motorised traffic
 - Improving permeability on existing roads for cycling, e.g. more contraflows on one-way streets, gaps to permit cycle movement where there is no motor vehicle access
 - Exploring Cycle Streets, Play Streets and temporary closures for events, play, etc. These are ways of changing the balance between users and promoting active travel and a more diverse use of streets and public spaces in line with paragraphs J and K of policy D7 of the new draft London Plan (2019)
 - Policy KT5- any proposals which require the relocation of bus infrastructure (including bus shelters), will need to be done in consultation and agreement with TfL

West Hampstead interchange

- Policy WHI - we generally support what is being proposed as the redevelopment of the land to the north side of the railway between West Hampstead and Finchley Road stations creates significant opportunities. With regard to WHI (j) and the potential to create step-free access, it should be noted that we have produced a feasibility report which focused on step-free access but also identified potential capacity enhancement measures and options for commercial development above and around an expanded ticket hall. As such, funding is needed to develop the scheme further and take it through to concept design. As such, we recommend the wording is enhanced, either here or under site specific policies to make clear the need for further design work as well as implementation.
- We welcome the reference in 9.8 to the need to explore step-free access at Finchley Road station and potentially other improvements via the adjacent O2 Centre. We do however wish to highlight that any works at this site would be difficult to implement owing to the curved nature of the station's platforms and high level of disruption that would be caused because of its crucial location on the Jubilee line. It is unclear why the building that is located between Finchley Road station and the O2 has not been included within the site boundary, given this currently presents a poor pedestrian environment
- There does not appear to be any reference to the development potential for the low-rise retail and commercial buildings on the southern side of Blackburn Road from its junction with West End Lane. This could be a key enabler for the

station improvements, as well as present an opportunity for joint development with TfL.

- Policy WHI2 (d) – we support increasing pedestrian and cyclist links between Finchley Road and West End Lane. As per our comments on ‘a new neighbourhood in West Hampstead’, we recommend that any improvements to this route be for pedestrians and cyclists only, to prevent any new route being used as a through route for vehicular traffic.
- Policy WHI3- As per our comments on ‘a new neighbourhood in West Hampstead’, any proposals for Blackburn Road should allow for the continued safeguarding of existing bus facilities, namely:
 - Two separate bus stops on Blackburn Road (one may be incorporated into a stand space)
 - Four stands which can be independently used by 12 metre buses
 - Driver toilets within a two minute walk of the stand and turning point for buses on the western end of Blackburn Road (as now)

IDS6: Camden Town Station OSD

- Paragraph 10.47 should make it clear that proposals are for a *station* capacity upgrade specifically.
- This site was acquired by TfL to be used as a main construction site (as well as deliveries) in order to be able to keep the existing station entrance open and minimise disruption during construction. We therefore suggest the following addition to paragraph 10.48: ‘It is envisaged to be used as the main construction site in order to be able to keep the existing station entrance open and minimise disruption during construction.’
- The possibility of sharing the site with the developer to bring forward the OSD can and should be looked at, so we suggest adding to the end of paragraph 10.49: ‘...unless a shared site agreement can be reached with the main contractor for the station box.’
- We would also add the following bullet points to Policy IDS6: ‘i. Ensure that the OSD does not compromise TfL’s existing, enhanced or additional infrastructure

IDS19: Land to the rear of the British Library

- This site falls within the Crossrail 2 safeguarding limits (March 2015). Liaison with Crossrail 2 should take place at an early stage as part of any development proposals for this site. We request that part j of the policy is replaced by the following wording: ‘Ensure the design of the development and public realm takes account the Crossrail 2 infrastructure requirements to deliver a design of exceptional quality.’



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City Planning

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24th January 2022

Dear Sir/Madam,

RE: Camden Site Allocations

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA).

The comments TfL provided as part of the original consultation on the Site Allocations document back in March 2020 (see attached) remain largely valid and should be used to inform future iterations of the document. Things have however evolved with regard to the Camden Goods Yard site, and it is therefore recommended that the policy for this area is updated accordingly.

It should also be noted that since 2020 we have been involved in discussions with the developer and LB Camden in relation to the West Hampstead interchange and have contributed to an SPD for the site. We would recommend that any future updates to the site allocations document take those ongoing discussions into account and is updated accordingly.

Camden Goods Yard

Over the past 12 months we have been involved in discussions with both Camden council and the developer with regard to the design of the site and the requirements for new bus stands and stops to serve both the proposed development and to support the wider bus network.

To date we have had difficulty in agreeing an operationally acceptable layout for buses with the applicant and are currently looking to redesign the stands at the site. As such, we would strongly recommend that any policy update for this site makes it clear that there is a requirement to both safeguard and deliver the necessary bus infrastructure (stops and stands)

needed to successfully operate the bus network in this area, and that this needs to be agreed with TfL in order to ensure operational requirements are being met.

It should also be stated in policy terms that contributions may be needed, as appropriate, to support the delivery of any changes to the bus network or associated infrastructure considered necessary as a result of the development.

I trust the above comments are helpful in the further preparation of the SPD, please do not hesitate to contact the case officer [REDACTED] should you have any questions.

Yours sincerely,

Josephine Vos
London Plan and Planning Obligations Manager, TfL City Planning
Email: [REDACTED]



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Dear Sir/Madam,

Re: Consultation on Camden draft local plan (Regulation 18)

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

Thank you for giving TfL the opportunity to comment on the Regulation 18 version of the Camden local plan.

The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

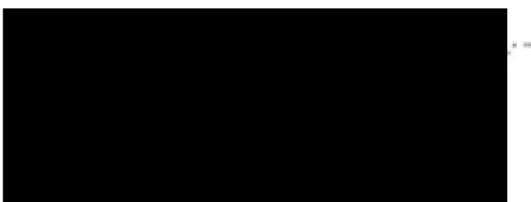
We therefore welcome policies in the draft Local Plan which support shifting journeys to sustainable modes, adopt the Healthy Streets Approach and exceed London Plan requirements for car parking and cycle parking. We particularly commend the Council for continuing to have a requirement for car-free development across the borough which continues to set an example for other well-connected local planning authorities in London.

We welcome support for public transport and active travel improvements and requirements for developments to contribute to transport infrastructure where appropriate. The Sustainable Transport, Walking and Cycling London Plan Guidance, published in November 2022 provides additional detail on the preparation of development plans to be in line with Chapter 10 of the London Plan. For the benefit of clarity and to be consistent with the Sustainable Transport, Walking and Cycling London Plan guidance, we encourage the Council to include a map of the planned and aspirational walking and cycling networks, as well as other transport improvements needed to support the plan.

Camden Town station capacity upgrade is a project of strategic importance to TfL given its importance in relation to the capacity upgrade on the Northern line. We encourage the Council to consider how the policies and site allocations in the plan could help deliver this.

We have a number of detailed comments and suggestions for amendments on specific policies, area plans and site allocations. These are included in the table in appendix A, below.

Yours faithfully,



Josephine Vos | Manager
London Plan and Planning Obligations team | Spatial Planning
Email: 

Appendix A: Detailed comments and suggestions for amendments

Policy	Page	Amendment/comment
General comments		<p>We welcome the Council's commitment and support for improving walking, cycling and public transport across the borough throughout the sub-area policies. We would encourage further setting out objectives to enhance bus infrastructure and improve bus journey times through these policies, as well as to protect and improve bus infrastructure across the borough.</p> <p>The plan should also clearly show the extent of the Crossrail 2 safeguarding limits which extend across a significant portion of the borough.</p>
Policy SI South Camden	29-32	<p>Part S Infrastructure</p> <p>Part i – We welcome continued support for HS2 and station improvements at Euston. We would encourage the Council to include improvements to the bus station and a link between Euston and Euston Square London Underground stations as part of this priority.</p> <p>Part ii – We welcome support for the planned upgrade of Holborn station. Developments in the vicinity of the station should contribute towards its delivery through a S.106 contribution.</p> <p>We welcome the Council's support for the removal of the King's Cross gyratory in Part iii of the policy. The policy should also clearly set out the potential to implement 2-way running for buses along Pancras Way and Midland Road. As outlined in Appendix I, TfL will work with the Council to design street improvements for the removal of the King's Cross gyratory. We also support proposals for improvements through the Holborn Liveable Neighbourhood scheme in part vii and further neighbourhood-based schemes in part viii. We support the delivery of a public realm which provides positive environment for people walking and cycling.</p> <p>Part iv - We support the plans to deliver improved pedestrian and cycle links, in line with Sustainable Transport, Walking and Cycling London Planning Guidance. We encourage the provision of a map of proposed walking and cycling routes and improvements to ensure they maximise the delivery of Healthy Streets and active travel guidance.</p>

Policy	Page	Amendment/comment
		Part ix - We anticipate a need to reinstate four tracks and a third platform on the North London line from the 2030s onwards to meet future passenger and freight demand, and provisions have been made in the disposal for this land to be returned to operational rail use when necessary. We recommend this is reflected in this policy.
ALLOCATION S4 (CSP2) – I20-I36 Camley Street	40-42	We support the requirements for improved public realm and connectivity along Camley Street. We would also encourage the site allocation to explicitly state how this would contribute to improved access to bus services on Agar Grove.
ALLOCATION S5 (CSP3)	42-44	We support the proposed improvements to the public realm along key routes. Given the site's relative isolation from the public transport network, development should also improve or contribute to improved access to the bus network. We note the requirement in Site Allocation S7 for development there to contribute towards a new canal crossing to improve connectivity between King's Cross, Camley Street and St. Pancras Way. This should be stated in this site allocation as well.
ALLOCATION S10 (ids1) – Network Building and Whitfield Street	53-54	This site is within the limits of the Crossrail 2 Safeguarding Directions which should be listed under 'Other Considerations'. Any development on this site should not result in piling which affects the planned running tunnels.
ALLOCATION S13 (IDS16) - Belgrove House 13- 21 Euston Road	59-60	<p>This site is within the limits of the Crossrail 2 Safeguarding Directions and is a site of surface interest insofar as it could be required for works at surface level. This should be clearly stated as part of the site allocation. While we did not object to the existing planning permission on the grounds that the site is outside the current scheme designs, any future planning applications should still be referred to TfL to confirm that this remains the case.</p> <p>We support the proposal for an integrated, step-free entrance to Kings Cross St. Pancras station to improve access for those who need a step-free route and improve the experience along Euston Road. Although implicit in the text, it should be clearly set out that this will be delivered as part of the development as works in kind and secured through an appropriate planning obligation.</p>
ALLOCATION S14 (IDS17) - Former Thameslink station, Pentonville Road	61-62	London Underground services and Thameslink services continue to operate through the former Kings Cross NR station which was decommissioned as part of the Thameslink programme. TfL should be closely consulted on any proposals which affect this site. We welcome the requirement to retain an entrance to Kings Cross St. Pancras station on the site.

Policy	Page	Amendment/comment
ALLOCATION S16 (IDS19) - Land to the rear of the British Library	65-67	<p>We note that the site allocation refers to the Crossrail 2 Safeguarding Directions which cover the site. The site is also an area of surface interest which will be necessary to construct the planned Euston St. Pancras station. Any development proposals for the site would need to demonstrate that:</p> <ul style="list-style-type: none"> • they will be compatible with the location of Crossrail 2 structures (tunnels, shafts and temporary works) proposed in the vicinity of the development, • accommodate any potential ground movement anticipated to arise from construction works and • mitigate against any potential effects of the operation of Crossrail 2. <p>We support the requirement for Crossrail 2 infrastructure to be incorporated into the design in a manner which responds positively to the public realm.</p> <p>As part of the extant planning permission for the site, a S.106 contribution of £150k has been secured towards a new Cycle Hire docking station in Ossulston Street. Any future proposals would also need to have a commensurate contribution secured towards a new Cycle Hire station.</p>
ALLOCATION S18 (HCG3) - Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street	70-72	<p>The development and design principles should make clear that no car parking should be retained, in line with London Plan and Camden policy and given the proximity of the site to Holborn and Tottenham Court Road stations.</p> <p>We welcome the requirement to contribute to public realm improvements planned for the area through the Holborn Liveable Neighbourhood project. We particularly support designs which enhance permeability through the site to create new pedestrian and cycle routes which complement the Liveable Neighbourhood scheme.</p>
Policy CI Central Camden	81-83	<p>Part O - Infrastructure</p> <p>We welcome the inclusion of step-free access at Kentish Town and Camden Town stations. Part i of the policy should be amended to also include Chalk Farm station.</p> <p>We are concerned however that the Council does not include the proposed Camden Town station capacity upgrade in the policy given the acute capacity constraints which exist at Camden Town station. Table 10.1 of the London Plan sets out our infrastructure priorities for delivering the London Plan, including London Underground step-free stations, station capacity upgrades and line upgrades. In addition to the capacity</p>

Policy	Page	Amendment/comment
		<p>pressures at Camden Town station, the station upgrade is an essential enabling component of a future Northern line upgrade which would allow more than the current 24 trains per hour. As such, this station upgrade is of strategic importance, not just for Camden, but London more widely.</p> <p>Although we continue to make the case for capital funding which could deliver this much needed upgrade, S.106 contributions, CIL and, where appropriate, works-in-kind from development in the surrounding area will be essential to enabling the station upgrade.</p> <p>As stated above, we anticipate a need to reinstate four tracks and a third platform on the North London line from the 2030s onwards to meet future passenger and freight demand, and provisions have been made in the disposal for this land to be returned to operational rail use when necessary. We recommend this is also reflected in this policy.</p> <p>We support the creation of spaces safe and attractive for pedestrians and bicycle users, as in line with Healthy Streets T2 London Plan Policy and Sustainable Transport, Walking and Cycling LPG. It should be ensured that development proposals improve permeability, and a map showing proposed walking and cycling routes would be beneficial.</p>
ALLOCATION C2 (KT2) – Regis Road and Holmes Road depot	86-89	<p>As noted in the site allocation, improvements to walking and cycling routes to and through the site will be critical to the delivery of Good Growth on this site. TfL supports proposals to enhance permeability and walking and cycling routes to provide an environment which enhances the public realm and delivers a positive environment for active travel. Additionally, we support the diversification of railway arch uses while enhancing the local public realm. Opportunities to increase permeability across the railway through the arches should also be explored, as noted in part p of the policy.</p> <p>We welcome the requirement for development proposals to contribute towards improvements of Kentish Town and Gospel Oak stations. We would encourage the allocation to also clearly refer to potential capacity upgrades at Kentish Town station. Funding for feasibility work may also be required.</p>
ALLOCATION C3 (KT3) – Murphy Site	90-92	<p>The railways and lack of permeability across the site present a significant challenge towards supporting travel by walking, cycling and public transport. Therefore, we strongly support all plans to deliver improved walking and cycling routes across the site and connecting to neighbouring sites.</p>

Policy	Page	Amendment/comment
		As with site C2 above, we welcome the requirement for development proposals to contribute towards improvements of Kentish Town and Gospel Oak stations. Funding for feasibility work may also be required in the case of Gospel Oak station.
ALLOCATION C5 (KT5) – 369 – 377 Kentish Town Road	95-96	We support widening of the pavement in this location, however any relocation of the existing bus shelter (Stop KF) would require consultation with TfL to confirm an appropriate new location which may prove challenging due to the road layout to the south of the site. A relocated bus shelter should also include real time passenger information.
ALLOCATION C7 (CGY2) – Morrisons supermarket	99-101	<p>We strongly support the removal of existing car parking on the site, in line with London Plan and draft Camden Local Plan policies. Access to the bus network should be included as part of the development and design principles, linked to achieving sustainable mode share targets.</p> <p>While the infrastructure requirements reference aiming to ‘minimise the environmental impacts of bus movements’, the bus stops, stands and routing into the site provides critical access and operational capacity to passengers and this should be recognised in the policy text. Indeed, the extant planning permission for the site provides for replacement bus stops and standing facilities. In addition to ‘ensuring that accessibility to bus services is maintained’, protecting bus operation, minimising bus delays and improving access to the bus network should also be included. This is important for current and future residents, employees and shoppers; particularly those with limited mobility. The note should also include the requirement to provide a safe and comfortable waiting environment for bus passengers.</p>
ALLOCATION C9 (CGY4) – 100 Chalk Farm Road	104-105	<p>We support the proposal for the enhancement of the public realm for walking and cycling. We further welcome the removal of existing car parking.</p> <p>Given the location of this site, it should safeguard future access to Chalk Farm station to enable step-free access and capacity improvements if required.</p>
ALLOCATION C10 (CGY5) – Juniper Crescent	106-108	We welcome the requirement for any development proposals to rationalise car parking on-site and that it is designed to allow for repurposing when no longer required. It should be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.

Policy	Page	Amendment/comment
		Proposals should have regard to the location of bus stops and stands as necessary. We note that the extant planning permission for the Morrisons site includes proposed reprovision of bus stops and stands adjacent to this site.
ALLOCATION CII (CGY6) – Network Rail land at Juniper Crescent	109-110	The infrastructure requirements of this site suggest that a new bus turning area should be considered in place of the planned arrangement at the Morrisons site. This would have to be in conjunction with the reprovision of stand spaces for five buses with independent bus movements and new bus stops for resident access, along with TfL-specified welfare facilities for bus drivers. Extending bus routes to a new terminus would incur ongoing operational cost which would need to have a viable business plan and be financially sustainable and would require a S.106 contribution.
ALLOCATION CI2 (CGY7) – Gilbeys Yard	111-113	We welcome the requirement for any development proposals to rationalise car parking on-site. It should be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.
ALLOCATION CI3 (IDS13) – West Kentish Town Estate	114-116	The site allocation should include a clear requirement for any development proposals to rationalise car parking on-site. It should also be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.
ALLOCATION CI4 (IDS11) – Wendling Estate and St Stephens Close	117-119	The site allocation should include a clear requirement for any development proposals to rationalise car parking on-site. It should also be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.
ALLOCATION CI6 (IDS6) - Camden Town over station development	122-124	<p>In line with our comments on Policy CI Central Camden, we encourage the Council to consider how to make most efficient use of land as part of this site to help deliver the Camden Town station capacity upgrade and step-free access.</p> <p>While a development on this site will be unlikely to deliver the station upgrade on its own, any development coming forward on this site should contribute towards the delivery of this scheme and development on this site may need to deliver works in kind for a new ticket hall and station box insofar as ensuring the full station upgrade can be delivered as and when funding is available. Any development on this site should additionally not preclude the delivery of the station capacity upgrade.</p>

Policy	Page	Amendment/comment
		Developments in the surrounding area should also provide a financial contribution towards the delivery of the station upgrade. While we acknowledge the desire to provide step-free access and capacity improvements to Kentish Town and Chalk Farm stations, we encourage the Council to prioritise Camden Town station for developer contributions.
Policy WI West Camden	133-135	Part L – We welcome that a new link and step-free access into West Hampstead and/or Finchley Road Underground stations are considered a key priority for the Council and note that progress towards enabling this is already underway. We would encourage the Council to clearly state that such improvements would also improve capacity at those stations. We also welcome support for the creation of walking and cycling routes which are set out in the Camden Transport Strategy (CTS). It would however be useful to include a map of these routes as part of the policy and supporting text itself. While we support the Council’s desire to improve the public realm around the West Hampstead stations and along the A41 Finchley Road among other areas, consideration should be given to improving the interchange experience, including with buses, and resulting pedestrian desire lines between the stations.
ALLOCATION W2 (WHI2) - O2 Centre, car park, car showrooms and 14 Blackburn Road	137-139	We support the infrastructure requirements included for this site allocation which gives strong consideration for all active, efficient and sustainable modes. However, part n of the policy should also require incorporating bus standing and driver facilities to TfL standards. We particularly welcome part t of the policy which requires the development to contribute towards bus priority and cycle infrastructure along West End Lane and Finchley Road, which are key public transport and active travel corridors.
Policy NI North Camden	153-154	Part F – We support the prioritisation of area-based schemes to improve conditions for walking and cycling through traffic reduction as well as extensions to the cycle network. For consistency and to aid in the effectiveness of the policy, part i and part ii should cross-reference the Camden Transport Strategy and Cycling Action Plan. As with other relevant policies, it would be clearer to include a map of the proposed walking and cycling networks.
ALLOCATION N4 (IDS201) - Hampstead Delivery Office	160	We note that this site allocation is intended to apply should the delivery office become surplus to Royal Mail requirements. Given this site allocation is in a PTAL 4 location we would expect one of the development requirements to specify that there should not be any car parking reprovided. Should the site be intensified with a delivery office remaining with other uses above, only Royal Mail operational parking would be acceptable.

Policy	Page	Amendment/comment
Policy H9 Purpose built student accommodation	209-216	<p>Part B vii – We welcome the requirement that development will be accessible to public transport and will not have a detrimental impact on the transport network. We suggest also expecting development to be located in proximity to the cycleway network given students’ propensity to cycle which should be fostered through policy.</p> <p>Para. 7.227 – We welcome the statement that ‘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.’ However, we recommend that the final sentence is clarified by stating that ‘Funding A <u>contribution towards public transport and other</u> services may be sought through planning obligations as appropriate <u>where there is deemed to be insufficient capacity or connectivity.</u>’</p>
Chapter 8 – Responding to climate change	225-250	We welcome that Policy CCI requires developments to prioritise sustainable transport as part of addressing the climate emergency. We would suggest that either this chapter or Chapter 14 highlights the significant role that decarbonisation of the transport network and mode shift play in reducing the carbon emissions of development. Transport is responsible for 27 per cent of carbon emissions in London.
Policy IE9 Delivery led food businesses	276-277	<p>Part A – We strongly support the requirements that:</p> <ul style="list-style-type: none"> ii. vehicle movements are minimised, and sustainable transport practices have been adopted with priority given to bicycles and cargo bikes. The Council may set limits on the number of vehicle movements and hours of operation; and iii. the premises will operate in accordance with an approved Travel Plan and Delivery and Servicing Management Plan. <p>We would also support the requirement for travel plans, supported by an appropriate planning condition, and/or a standalone planning condition to not permit deliveries from the site to be made by moped or motorcycle.</p>
Policy DI Achieving design excellence	321-324	We support the movement requirements of this policy, which are in line with Policy T2 Healthy Streets of the London Plan. We also welcome the requirement for public spaces to be uncluttered and accessible for all.
Policy D6 – Basements	342-343	We note that the policy requires developments to demonstrate that any basement development would not cause harm to neighbouring properties. This should also include London Underground infrastructure.

Policy	Page	Amendment/comment
Policy A1 – Protecting Amenity	355-360	We support the transport requirements of the policy, which are in line with London Plan Policies T4 Assessing and mitigating transport impacts and T7 Deliveries, servicing and construction.
Policy T1 Safe, Healthy and Sustainable Transport	374–375	We broadly support the approach to transport set out in this policy which is in close alignment with the London Plan. As part of the policy, we recommend that reference is made to supporting the Mayor's target for 80 per cent of all journeys to be made by active, efficient and sustainable modes through including the borough's LIP target of 93 per cent of all journeys in Camden to be made by sustainable modes by 2041. We also recommend including support for the Mayor's Vision Zero target.
Policy T2 Prioritising walking, wheeling and cycling	376–378	We welcome the measures in this policy which are in alignment with the London Plan and the Sustainable Transport, Walking and Cycling LPG. We recommend including the maps of the planned walk and cycle networks as part of the supporting text.
Policy T3 Public Transport	378–379	<p>Part A – We welcome this statement although we recommend that bus stands and drivers facilities are added to the list of infrastructure so that it reads as follows: 'To safeguard and promote the provision of public transport in the borough the Council will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, <u>bus stands, drivers' facilities, real time passenger information</u>, signage, and timetable information.'</p> <p>Part B – We welcome confirmation that 'Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments and the provision of improved public transport infrastructure including bus shelters and passenger information, and step free access at stations in the borough.' We additionally welcome the explicit reference to securing contributions towards providing step-free access at stations in the borough.</p> <p>Part C – We welcome the requirement for developments, as appropriate, to facilitate and improve interchange opportunities. The policy or supporting text could additionally refer to TfL's Interchange Best Practice Guidelines, available at: https://content.tfl.gov.uk/interchange-best-practice-guidance-2021.pdf</p>
Policy T4 Shared Transport	379-381	Part A – We broadly welcome the approach to shared transport infrastructure and services including the commitment in part i. to 'work with Transport for London to expand and improve the Santander cycle

Policy	Page	Amendment/comment
Infrastructure and Services		<p>hire docking station network in the borough.' However, caution may be required with part vi. 'work with car club operators to expand and improve the network of car club bays in the borough, including the provision of electric car club vehicles where possible.' Given the requirement for car free development, car clubs are best targeted at areas that are less well-connected and have higher rates of car ownership where they can substitute for private vehicles. Car club spaces count towards parking provision in new developments and would therefore not be appropriate generally, and less so in well-connected locations with a choice of active travel and public transport alternatives because of the potential risk of encouraging car use which would otherwise might not happen.</p> <p>We would be interested to see the methodology and outputs of the Shared Transport Access Level in Camden (STALC) work which is referenced in the supporting text.</p>
Policy T5 Parking and Car Free Development	381-383	<p>Part A – We strongly support the policy that 'The Council will limit the availability of parking and require all new developments in the borough to be car-free.' It is important for any car club provision to be consistent with this, for example, if car clubs were provided in locations where the overall supply of parking is reduced, this could be in line with the spirit of reduced car ownership and vehicle dominance.</p> <p>Part iic – As noted under T4, car club spaces may not be appropriate for car free developments in well-connected locations and could encourage car use, contrary to the overall aims of the policy. Car club spaces should not be permitted in areas which the London Plan requires to be car free, as only blue badge car parking is permitted such developments.</p> <p>Part v – We strongly support the redevelopment of existing car parks for alternative uses. This should be expanded to include redevelopment of vehicle storage areas such as garages above and below ground and the repurposing of individual car parking spaces both on and off street, including the removal of redundant crossovers.</p> <p>Part vi – The wording should be clarified as follows: '<u>where residential estates are redeveloped</u>, reduce on-site parking, as far as possible, <u>with a plan for the redeveloped site to eventually be car free as part of re-development schemes</u>.' The London Plan is clear that where sites are redeveloped the latest parking standards should be applied. The car free requirement of this Local Plan policy should be applied to all residential and commercial redevelopments except where existing residents with entitlements to parking</p>

Policy	Page	Amendment/comment
		<p>permits are rehoused as part of an estate redevelopment. The amended wording would be consistent with para. 14.33.</p> <p>Para. 14.30 – We welcome clarification that ‘Staff parking is not considered essential and will not be permitted.’</p>
Policy T6 Sustainable Movement of Goods, Services and Materials	383–386	<p>Part A – We support an approach that encourages movement by bicycle, canal and rail where possible, including provision for cargo bikes. In part v, the priority order should be foot, cargo bike or zero emission vehicles because even zero emission vehicles take up space within the development and the street thereby contributing to congestion.</p> <p>We welcome the requirement in part ii for cargo cycle parking in major developments, although this should be in addition to wide-spaced Sheffield stands for non-standard cycles expected in new developments. We also welcome the requirement in part iii for contributions towards new and improved cycle infrastructure for logistics developments resulting in additional cargo cycle movements, including exploration of the provision of loading and short-term parking spaces for cargo cycles to facilitate their use in a way that is safe and non-disruptive for others, in particular people walking and using buses.</p> <p>In part vii. Care should be taken in the location and design of micro mobility hubs and urban logistics hubs so that they do not attract vehicles into areas designed primarily for walking and cycling. We therefore welcome the statement in 14.49 that ‘The Council will seek to secure contributions towards the provision of freight consolidation hubs and micro mobility hubs where such provision would result in reduced vehicle trips and impacts on the environment.’</p> <p>Part B – We recommend the consistent use of the terms Construction Logistics Plans and Delivery and Servicing Plans throughout the Local Plan in accordance with the London Plan and TfL guidance.</p>
Policy DMI Delivery and Monitoring		<p>Part A.vi – We welcome the commitment to ‘using CIL, planning contributions and legal agreements where appropriate to:</p> <ul style="list-style-type: none"> a. support healthy and sustainable development b. secure the infrastructure, facilities and services to meet the needs generated by development c. mitigate the impact of development’

Policy	Page	Amendment/comment
		<p>Para. 15.20 – The list of matters that are likely to be addressed through planning obligations should include <u>'public transport and active travel improvements'</u> to ensure consistency with Local Plan policies T2 and T3 and London Plan policy DFI D which states that in setting policies seeking planning obligations priority should be given to affordable housing and necessary public transport improvements. This is important because some transport improvements such as contributions towards bus capacity or step free access cannot easily be addressed through CIL and should be explicitly identified in the list of planning obligation matters.</p> <p>Para – 15.23 We welcome the statement that 'Pooled contributions will be used when the combined impact of development in an area creates the need for related infrastructure or works that will not be funded by CIL.' This is particularly relevant to transport improvements such as step-free access, bus capacity or Healthy Streets improvements.</p>
Appendix I – Infrastructure Schedule	396-424	<p>37 Potential redevelopment of Euston station – The Euston Area Plan proposals to 'help shape change in the area around Euston station' are supported and it is encouraged that these plans support a positive environment for pedestrians and active travel under public realm guidance in the London Plan. We encourage the Council to include improvements to London Underground stations, particularly the proposed link between Euston and Euston Square stations, as well as improvements to Euston bus station.</p> <p>38 Crossrail 2 –We welcome the continued support for Crossrail 2 which will provide much needed capacity benefits to stations and lines in Camden, particularly with the commencement of HS2 services to Euston station. For consistency, the text should be amended to read 'Crossrail 2'. Additionally, the anticipated opening date of Crossrail 2 is now beyond the plan period given ongoing funding challenges.</p> <p>39 Piccadilly line improvement – For consistency, this should refer to the 'Piccadilly line upgrade'.</p> <p>40 Bus service enhancement – We support the improvement of bus services through frequency, capacity and route improvements funded through developer contributions.</p> <p>41 Camden Town station capacity upgrade – We note that the status of this project is currently shown as paused, subject to funding. We encourage the Council to amend the delivery period to 'Plan period' in line with other schemes which are not currently committed but otherwise deliverable.</p>

Policy	Page	Amendment/comment
		<p>42 Holborn station – The location should be corrected to read 'Holborn'. Due to funding constraints, this will not be delivered by 2026.</p> <p>43 Step free access at Kentish Town, Camden Town and West Hampstead stations – We welcome support for further step-free access at stations in Camden. TfL is committed to providing step-free access at additional stations as funding becomes available and developer contributions towards step-free access will be essential to further delivery as has been the case at West Hampstead station.</p> <p>52 Bus priority – We welcome the Council's commitment to extending bus priority measures across the borough. In addition to new and extended bus lanes and removing on-street car parking, we would encourage the inclusion of measures such as bus gates, which can be implemented in context where bus lanes are not feasible, particularly on roads where space is constrained. We also strongly suggest reviewing and extending hours of bus lane operation which can ensure efficient operation of the bus network throughout the day. This can also have additional benefits for people cycling on streets without dedicated cycle infrastructure as well as allowing for safer and smoother journeys on buses, ie fewer trips and falls as buses do not need to pull in and out.</p>



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Dear Sir/Madam,

Re: Consultation on Camden draft local plan (Regulation 19)

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

Thank you for giving TfL the opportunity to comment on the Regulation 19 version of the Camden local plan.

The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

We therefore welcome policies, alongside the amendments made in response to our Regulation 18 comments, in the draft Local Plan as these support shifting journeys to sustainable modes and exceed London Plan requirements for car parking and cycle parking. We particularly commend the Council for continuing to have a requirement for car-free development across the borough which continues to set an example for other well-connected local planning authorities in London.

We welcome support for public transport and active travel improvements and requirements for developments to contribute to transport infrastructure where appropriate. The Sustainable Transport, Walking and Cycling London Plan Guidance, published in November 2022 provides additional detail on the preparation of development plans to be in line with Chapter 10 of the London Plan. For the benefit of clarity and to be consistent with the Sustainable Transport, Walking and Cycling London Plan guidance, we continue to encourage the Council to include a map of the planned and aspirational walking and cycling networks, as well as other transport improvements needed to support the plan.

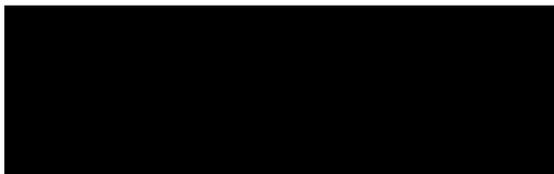
The Camden Town station capacity upgrade remains a project of strategic importance given it is an essential enabling component of a future Northern line upgrade, which would facilitate more than the current 24 trains per hour. We therefore encourage the Council to carefully consider how the policies and site allocations in the plan could make the most efficient use of land to help deliver this upgrade alongside step-free access.

We encourage the Council to make clear in the draft Plan where and how bus infrastructure, including priority measures, will be enhanced to support the efficient operation of the bus network and improved journey times. Relevant site allocations should be more specific with infrastructure requirements to protect access to the bus network and enhance infrastructure as part of development and design principles, linked to achieving sustainable mode share targets.

Furthermore, the council should make clear the process of Crossrail 2 safeguarding limits and outline how this might affect development of safeguarded sites within the relevant site allocations.

We have a number of detailed comments and suggestions for amendments on specific policies, area plans and site allocations. These are included in the table in appendix A, below.

Yours faithfully,



Josephine Vos | Manager
London Plan and Planning Obligations team | Spatial Planning
Email: 

Appendix A: Detailed comments and suggestions for amendments

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
General comments & Crossrail 2		<p>We welcome the Council's commitment and support for improving walking, cycling and public transport across the borough throughout the sub-area policies. We would encourage further setting out objectives to enhance bus infrastructure and improve bus journey times through these policies, as well as to protect and improve bus infrastructure across the borough.</p> <p>The plan should also clearly show the extent of the Crossrail 2 safeguarding limits which extend across a significant portion of the borough.</p>		<p>Our comments made in response to the Regulation 18 consultation remain valid. We would like to reiterate our comments on setting out specific objectives to enhance bus infrastructure through policy. For relevant policies, we encourage the council to include maps outlining proposed walking and cycle routes for clarity. This includes Policy SI South Camden, Policy CI Central Camden, Policy WI West Camden, Policy T2 Prioritising Walking, Wheeling and Cycling.</p> <p>The Council should make the safeguarding limits, including sites of surface interest, clear within the relevant area policies of the draft Plan. We note that the safeguarding directions are now clearly stated in the relevant site allocations, except where stated below.</p> <p>Developments above running tunnels should carefully consider foundation design to ensure that there is a pile free corridor that will allow us to build Crossrail 2 tunnels in the future. Development designs should ensure that the building will not be compromised by the future tunnels and that any future occupiers will not experience noise and vibration from the future operation of Crossrail 2. In these circumstances, development can usually proceed but the developer will need to discharge our recommended Crossrail 2 conditions (if recommended) that ensure the foundation design meets these criteria.</p>
Policy SI South Camden	29-32	<p>Part S Infrastructure</p> <p>Part i – We welcome continued support for HS2 and station improvements at Euston. We would encourage the Council to include improvements to the bus station and a link between Euston and Euston Square London Underground stations as part of this priority.</p>	44-47	<p>While the Council may wish to address Crossrail 2 safeguarding through a separate policy which covers the whole borough, much of the Crossrail 2 safeguarding limits are located within the South Camden area. We would recommend Crossrail 2 safeguarding to be referenced in this policy.</p> <p>Part U Infrastructure</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>Part ii – We welcome support for the planned upgrade of Holborn station. Developments in the vicinity of the station should contribute towards its delivery through a S.106 contribution.</p> <p>We welcome the Council’s support for the removal of the King’s Cross gyratory in Part iii of the policy. The policy should also clearly set out the potential to implement 2-way running for buses along Pancras Way and Midland Road. As outlined in Appendix I, TfL will work with the Council to design street improvements for the removal of the King’s Cross gyratory. We also support proposals for improvements through the Holborn Liveable Neighbourhood scheme in part vii and further neighbourhood-based schemes in part viii. We support the delivery of a public realm which provides positive environment for people walking and cycling.</p> <p>Part iv - We support the plans to deliver improved pedestrian and cycle links, in line with Sustainable Transport, Walking and Cycling London Planning Guidance. We encourage the provision of a map of proposed walking and cycling routes and improvements to ensure they maximise the delivery of Healthy Streets and active travel guidance.</p> <p>Part ix - We anticipate a need to reinstate four tracks and a third platform on the North London line from the 2030s onwards to meet future passenger and freight demand, and provisions have been made in the disposal for this land to be returned to operational rail use when necessary. We recommend this is reflected in this policy.</p>		<p>Part 1 – We welcome the council’s continued support for HS2 and station improvements at Euston as detailed further in the new Policy S2 Euston area. For consistency with the Euston Area Plan and ongoing discussions with the DfT, the policy should make clear that improvements are needed for other transport infrastructure at Euston such as the Underground station and bus station. We recommend the following modifications to part 1 of the policy for effectiveness: ‘The delivery of a new High Speed 2 station and mainline station improvements at Euston, <u>alongside improvements to other supporting public transport and active travel infrastructure serving the station.</u>’</p> <p>Part 2 – For consistency with the proposals of the Euston Healthy Streets programme, we recommend the following edits for clarity: ‘The transformation of Euston Road <u>in accordance with Euston Healthy Streets</u> and the removal of the King’s Cross gyratory.’</p> <p>Part 9 – We welcome the amendments made to the policy to reflect the potential need to reinstate four tracks and a third platform on the North London line to meet future passenger and freight demand.</p> <p>The policy also has the opportunity to set out proposals more generally to improve bus infrastructure and journey times.</p>
Policy S2 Euston area	N/A	N/A	48-51	We welcome the new policy, particularly in emphasising the importance of delivering an improved and integrated transport

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
				interchange at Euston as well as seeking connectivity improvements within the area and to surrounding areas of the borough.
ALLOCATION S5 (Formerly S4) (CSP2) – 120-136 Camley Street	40-42	We support the requirements for improved public realm and connectivity along Camley Street. We would also encourage the site allocation to explicitly state how this would contribute to improved access to bus services on Agar Grove.	62-64	Part II – We welcome the amendments outlining the provision of a new public space that facilitates a coordinated route along the boundary with Agar Grove Estate, enhancing connectivity for pedestrians and cyclists along Camley Street. We note, however, that parts II.a and II.b of the policy appear to be duplicates. Part 12 – We welcome the addition that development will be expected to contribute towards improved access to bus services on Agar Grove.
ALLOCATION S6 (Formerly S5) (CSP3) – 104 – 114 Camley Street and Cedar Way Industrial Estate	42-44	We support the proposed improvements to the public realm along key routes. Given the site's relative isolation from the public transport network, development should also improve or contribute to improved access to the bus network. We note the requirement in Site Allocation S7 for development there to contribute towards a new canal crossing to improve connectivity between King's Cross, Camley Street and St. Pancras Way. This should be stated in this site allocation as well.	65-67	We note the new requirement in Site Allocation S5 for development to contribute towards improved access to bus services. As per our Reg. 18 comments, this should be extended to this site allocation as well. Part 18 – We welcome the requirement for development in this site allocation to contribute towards a new canal crossing to improve connectivity between King's Cross, Camley Street and St. Pancras Way.
ALLOCATION S12 (Formerly S13) (IDS16) - Belgrove House 13- 21 Euston Road	59-60	This site is within the limits of the Crossrail 2 Safeguarding Directions and is a site of surface interest insofar as it could be required for works at surface level. This should be clearly stated as part of the site allocation. While we did not object to the existing planning permission on the grounds that the site is outside the current scheme designs, any future planning applications should still be referred to TfL to confirm that this remains the case. We support the proposal for an integrated, step-free entrance to Kings Cross St. Pancras station to improve access for those who need a step-free route and improve the experience along Euston Road. Although implicit in the text, it should be clearly set out that this will be	80-81	We welcome the amendments made in line with our response to the Regulation 18 consultation, including that TfL is a key consultee for the site due to its status as a site of surface interest. Part 6 – The policy should make clear that an integrated, step-free entrance to Kings Cross St Pancras station should be delivered as works in kind and secured through an appropriate planning obligation.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		delivered as part of the development as works in kind and secured through an appropriate planning obligation.		
ALLOCATION S15 (Formerly S16) (IDS19) - Land to the rear of the British Library	65-67	<p>We note that the site allocation refers to the Crossrail 2 Safeguarding Directions which cover the site. The site is also an area of surface interest which will be necessary to construct the planned Euston St. Pancras station. Any development proposals for the site would need to demonstrate that:</p> <ul style="list-style-type: none"> • they will be compatible with the location of Crossrail 2 structures (tunnels, shafts and temporary works) proposed in the vicinity of the development, • accommodate any potential ground movement anticipated to arise from construction works and • mitigate against any potential effects of the operation of Crossrail 2. <p>We support the requirement for Crossrail 2 infrastructure to be incorporated into the design in a manner which responds positively to the public realm.</p> <p>As part of the extant planning permission for the site, a S.106 contribution of £150k has been secured towards a new Cycle Hire docking station in Ossulston Street. Any future proposals would also need to have a commensurate contribution secured towards a new Cycle Hire station.</p>	86-87	<p>Parts 8 & 9 – We welcome the amendments made to the policy, in line with our response to the Regulation 18 consultation.</p> <p>We would like to reiterate that any future proposals for this for the site would need to have a contribution secured towards a new Cycle Hire station commensurate with the scale of development. We recommend that this is clearly stated, as written in our regulation 18 comments, under 'infrastructure requirements' of the site allocation.</p>
ALLOCATION S17 (Formerly S18) (HCG3) - Selkirk House, 166 High Holborn, I	70-72	The development and design principles should make clear that no car parking should be retained, in line with London Plan and Camden policy and given the proximity of the site to Holborn and Tottenham Court Road stations.	90-92	Part 5 – We welcome the clarification that development must remove existing on-site car parking, in line with the London Plan Policy T6 and the Council's car free approach set out in the Local Plan Policy T5.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street		We welcome the requirement to contribute to public realm improvements planned for the area through the Holborn Liveable Neighbourhood project. We particularly support designs which enhance permeability through the site to create new pedestrian and cycle routes which complement the Liveable Neighbourhood scheme.		
Policy CI Central Camden	81-83	<p>Part O - Infrastructure</p> <p>We welcome the inclusion of step-free access at Kentish Town and Camden Town stations. Part i of the policy should be amended to also include Chalk Farm station.</p> <p>We are concerned however that the Council does not include the proposed Camden Town station capacity upgrade in the policy given the acute capacity constraints which exist at Camden Town station. Table 10.1 of the London Plan sets out our infrastructure priorities for delivering the London Plan, including London Underground step-free stations, station capacity upgrades and line upgrades. In addition to the capacity pressures at Camden Town station, the station upgrade is an essential enabling component of a future Northern line upgrade which would allow more than the current 24 trains per hour. As such, this station upgrade is of strategic importance, not just for Camden, but London more widely.</p> <p>Although we continue to make the case for capital funding which could deliver this much needed upgrade, S.106 contributions, CIL and, where appropriate, works-in-kind from development in the surrounding area will be essential to enabling the station upgrade.</p>	106-109	<p>Part O – Infrastructure</p> <p>Part 1 – We welcome the amendments made to include Chalk Farm station as a priority for step-free access. It should be noted however that further investigation internally has found that it will be exceptionally challenging to deliver step-free access at this station. While there may still be an opportunity to do so, it will be dependent on providing access from Site Allocation C8 Former Morrisons petrol filling station.</p> <p>Part 2 – We welcome the amendments made to include capacity upgrades at Camden Town Underground station in light of existing capacity constraints.</p> <p>Part 3 – We welcome the amendments made to the policy to reflect the potential need to reinstate four tracks and a third platform on the North London line to meet future passenger and freight demand.</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>As stated above, we anticipate a need to reinstate four tracks and a third platform on the North London line from the 2030s onwards to meet future passenger and freight demand, and provisions have been made in the disposal for this land to be returned to operational rail use when necessary. We recommend this is also reflected in this policy.</p> <p>We support the creation of spaces safe and attractive for pedestrians and bicycle users, as in line with Healthy Streets T2 London Plan Policy and Sustainable Transport, Walking and Cycling LPG. It should be ensured that development proposals improve permeability, and a map showing proposed walking and cycling routes would be beneficial.</p>		
ALLOCATION C2 (KT2) – Regis Road and Holmes Road depot	86-89	<p>As noted in the site allocation, improvements to walking and cycling routes to and through the site will be critical to the delivery of Good Growth on this site. TfL supports proposals to enhance permeability and walking and cycling routes to provide an environment which enhances the public realm and delivers a positive environment for active travel. Additionally, we support the diversification of railway arch uses while enhancing the local public realm. Opportunities to increase permeability across the railway through the arches should also be explored, as noted in part p of the policy.</p> <p>We welcome the requirement for development proposals to contribute towards improvements of Kentish Town and Gospel Oak stations. We would encourage the allocation to also clearly refer to potential capacity upgrades at Kentish Town station. Funding for feasibility work may also be required.</p>	112-116	We welcome the further requirement to explore north-south permeability across the railway.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
ALLOCATION C3 (KT3) – Murphy Site	90-92	<p>The railways and lack of permeability across the site present a significant challenge towards supporting travel by walking, cycling and public transport. Therefore, we strongly support all plans to deliver improved walking and cycling routes across the site and connecting to neighbouring sites.</p> <p>As with site C2 above, we welcome the requirement for development proposals to contribute towards improvements of Kentish Town and Gospel Oak stations. Funding for feasibility work may also be required in the case of Gospel Oak station.</p>	117-120	Our comments made in response to the Regulation 18 consultation remain valid. The site allocation should clearly set out in that funding for a feasibility study may be required for improvements to Gospel Oak station.
ALLOCATION C5 (KT5) – 369 – 377 Kentish Town Road	95-96	We support widening of the pavement in this location, however any relocation of the existing bus shelter (Stop KF) would require consultation with TfL to confirm an appropriate new location which may prove challenging due to the road layout to the south of the site. A relocated bus shelter should also include real time passenger information.	123-124	Part 6 – Our comments made in response to the Regulation 18 consultation remain valid. We recommend the following edits for clarity: ‘contribute towards the relocation <u>and enhancement</u> of the bus shelter, <u>in collaboration with Transport for London</u> , to improve passenger and pedestrian safety, consistent with aspirations for a new Kentish Town Square. <u>Any relocated bus shelter should include real time passenger information.</u> ’
ALLOCATION C7 (CGY2) – Morrisons supermarket	99-101	<p>We strongly support the removal of existing car parking on the site, in line with London Plan and draft Camden Local Plan policies. Access to the bus network should be included as part of the development and design principles, linked to achieving sustainable mode share targets.</p> <p>While the infrastructure requirements reference aiming to ‘minimise the environmental impacts of bus movements’, the bus stops, stands and routing into the site provides critical access and operational capacity to passengers and this should be recognised in the policy text. Indeed, the extant planning permission for the site provides for replacement bus stops and standing facilities. In addition to ‘ensuring that accessibility to bus services is</p>	127-130	<p>Our comments made in response to the Regulation 18 consultation remain valid.</p> <p>Part 13 – We do not support permanent off-site bus standing facilities due to the increased operational costs that will be difficult to recover in the long-term, we therefore recommend the following modifications to the policy: ‘including the practicality of alternative locations outside the site. <u>Permanent bus standing facilities should be provided on-site, and any off-site provision should be temporary and for the duration of the works. Details of bus standing facilities are subject to agreement with TfL.</u>’</p> <p>Furthermore, the policy should state ‘<u>Development must contribute to any additional costs associated with rerouting of</u></p>

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		<p>maintained', protecting bus operation, minimising bus delays and improving access to the bus network should also be included. This is important for current and future residents, employees and shoppers; particularly those with limited mobility. The note should also include the requirement to provide a safe and comfortable waiting environment for bus passengers.</p>		<p><u>additional bus services to serve the development or alternative bus standing locations.</u>'</p>
<p>ALLOCATION C10 (CGY5) – Juniper Crescent</p>	<p>106-108</p>	<p>We welcome the requirement for any development proposals to rationalise car parking on-site and that it is designed to allow for repurposing when no longer required. It should be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.</p> <p>Proposals should have regard to the location of bus stops and stands as necessary. We note that the extant planning permission for the Morrisons site includes proposed reprovision of bus stops and stands adjacent to this site.</p>	<p>137-139</p>	<p>We note that the part II of policy does require car parking to 'be designed to allow for repurposing when no longer required'. We recommend the policy is modified as follows for clarity: '...be designed to allow for repurposing when no longer required existing residents move out or permits are given up; and'</p>
<p>ALLOCATION C11 (CGY6) – Network Rail land at Juniper Crescent</p>	<p>109-110</p>	<p>The infrastructure requirements of this site suggest that a new bus turning area should be considered in place of the planned arrangement at the Morrisons site. This would have to be in conjunction with the reprovision of stand spaces for five buses with independent bus movements and new bus stops for resident access, along with TfL-specified welfare facilities for bus drivers. Extending bus routes to a new terminus would incur ongoing operational cost which would need to have a viable business plan and be financially sustainable and would require a S.106 contribution.</p>	<p>140-142</p>	<p>We would like to reiterate our previous comments that a new bus turning area is likely to come with constraints that would need careful planning in collaboration with Transport for London to ensure the changes do not have negative impacts. We recommend this is reflected in the site allocation.</p> <p>We suggest the following edits to part 8 of the policy: 'An operational area within the site could, for example, support a bus turning area at the end of the existing access road in conjunction with the reprovision of stand spaces for five buses with independent bus movements, new bus stops for resident access, and TfL-specified welfare facilities for bus drivers.'</p>

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ALLOCATION CI2 (CGY7) – Gilbeys Yard	111-113	We welcome the requirement for any development proposals to rationalise car parking on-site. It should be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.	143-146	Part 9 of the policy should be modified to state, 'rationalise parking on-site in line with Policy T5 (Parking and Car Free Development), <u>be designed to allow for repurposing when existing residents move out or permits are given up</u> and reduce vehicular dominance;' to ensure the development complies with London Plan car parking standards in future.
ALLOCATION CI3 (IDS13) – West Kentish Town Estate	114-116	The site allocation should include a clear requirement for any development proposals to rationalise car parking on-site. It should also be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.	147-149	We welcome the addition of part 8 of the policy, however it should be modified to state, 'where existing residents parking is reprovided, this should be located to minimise d car movements within the site, and be -designed to allow for repurposing when no longer required existing residents move out or permits are given up. '
ALLOCATION CI5 (Formerly CI4) (IDS11) – Wendling Estate and St Stephens Close	117-119	The site allocation should include a clear requirement for any development proposals to rationalise car parking on-site. It should also be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.	152-154	We welcome the addition of part 6 of the policy, however it should be modified to state, "where existing residents parking is reprovided, this should be located to minimise d car movements within the site, and be -designed to allow for repurposing when no longer required existing residents move out or permits are given up. "
ALLOCATION CI7 (Formerly CI6) (IDS6) - Camden Town over station development	122-124	In line with our comments on Policy CI Central Camden, we encourage the Council to consider how to make most efficient use of land as part of this site to help deliver the Camden Town station capacity upgrade and step-free access. While a development on this site will be unlikely to deliver the station upgrade on its own, any development coming forward on this site should contribute towards the delivery of this scheme and development on this site may need to deliver works in kind for a new ticket hall and station box insofar as ensuring the full station upgrade can be delivered as and when funding is available. Any	157-160	Our comments made in response to the Regulation 18 consultation remain valid.

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		<p>development on this site should additionally not preclude the delivery of the station capacity upgrade.</p> <p>Developments in the surrounding area should also provide a financial contribution towards the delivery of the station upgrade. While we acknowledge the desire to provide step-free access and capacity improvements to Kentish Town and Chalk Farm stations, we encourage the Council to prioritise Camden Town station for developer contributions.</p>		
Policy WI West Camden	133-135	<p>Part L – We welcome that a new link and step-free access into West Hampstead and/or Finchley Road Underground stations are considered a key priority for the Council and note that progress towards enabling this is already underway. We would encourage the Council to clearly state that such improvements would also improve capacity at those stations. We also welcome support for the creation of walking and cycling routes which are set out in the Camden Transport Strategy (CTS). It would however be useful to include a map of these routes as part of the policy and supporting text itself. While we support the Council’s desire to improve the public realm around the West Hampstead stations and along the A41 Finchley Road among other areas, consideration should be given to improving the interchange experience, including with buses, and resulting pedestrian desire lines between the stations.</p>	172-173	<p>Part L Infrastructure</p> <p>Part I – We welcome the modifications to highlight capacity improvements to the stations.</p> <p>Part 5 – We strongly welcome the additional priority for improving the interchange experience both between the three West Hampstead stations and in relation to the surrounding bus, pedestrian and cycle network.</p>
ALLOCATION W2 (WHI2) - O2 Centre, car park, car showrooms and I4 Blackburn Road	137-139	<p>We support the infrastructure requirements included for this site allocation which gives strong consideration for all active, efficient and sustainable modes. However, part n of the policy should also require incorporating bus standing and driver facilities to TfL standards. We particularly welcome part t of the policy which requires the development to contribute towards bus priority and</p>	176-178	<p>Part I6 – We welcome the requirement for development to be supported by a bus infrastructure plan to deliver improvements to bus stop facilities both with, and in the vicinity of, the site.</p>

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		cycle infrastructure along West End Lane and Finchley Road, which are key public transport and active travel corridors.		
Policy NI North Camden	153-154	Part F – We support the prioritisation of area-based schemes to improve conditions for walking and cycling through traffic reduction as well as extensions to the cycle network. For consistency and to aid in the effectiveness of the policy, part i and part ii should cross-reference the Camden Transport Strategy and Cycling Action Plan. As with other relevant policies, it would be clearer to include a map of the proposed walking and cycling networks.	198-199	Part F – We welcome the cross referencing of the Camden Transport Strategy and Cycling Action Plan within the policy.
ALLOCATION N4 (IDS201) - Hampstead Delivery Office	160	We note that this site allocation is intended to apply should the delivery office become surplus to Royal Mail requirements. Given this site allocation is in a PTAL 4 location we would expect one of the development requirements to specify that there should not be any car parking reprovided. Should the site be intensified with a delivery office remaining with other uses above, only Royal Mail operational parking would be acceptable.	205-206	To ensure the Site Allocation complies with London Plan Policy T6, an additional part 4 of the policy should be added: <u>'Development must be car free, except for Royal Mail operational parking.'</u>
Policy H9 Purpose built student accommodation	209-216	<p>Part B vii – We welcome the requirement that development will be accessible to public transport and will not have a detrimental impact on the transport network. We suggest also expecting development to be located in proximity to the cycleway network given students' propensity to cycle which should be fostered through policy.</p> <p>Para. 7.227 – We welcome the statement that '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.' However, we recommend that the final sentence is clarified by stating that <u>'Funding-A</u></p>	275-284	<p>Our comments made in response to the Regulation 18 consultation remain valid.</p> <p>For clarity, para. 7.299 should be modified to state, <u>'Funding-A contribution towards public transport and other services may be sought through planning obligations as appropriate <u>where there is deemed to be insufficient capacity or connectivity.</u></u></p>

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		<u>contribution towards public transport and other</u> services may be sought through planning obligations as appropriate <u>where there is deemed to be insufficient capacity or connectivity.</u>		
Policy D6 – Basements	342–343	We note that the policy requires developments to demonstrate that any basement development would not cause harm to neighbouring properties. This should also include London Underground infrastructure.	476–483	Our comments made in response to the Regulation 18 consultation remain valid.
Policy TI Safe, Healthy and Sustainable Transport	374–375	We broadly support the approach to transport set out in this policy which is in close alignment with the London Plan. As part of the policy, we recommend that reference is made to supporting the Mayor’s target for 80 per cent of all journeys to be made by active, efficient and sustainable modes through including the borough’s LIP target of 93 per cent of all journeys in Camden to be made by sustainable modes by 2041. We also recommend including support for the Mayor’s Vision Zero target.	516–519	Paragraph 14.4 – We welcome the references made to the Mayor’s Vision Zero strategy and Healthy Streets Approach, alongside the council’s LIP target of 93 per cent of all journeys in Camden to be made by sustainable modes by 2041.
Policy T2 Prioritising walking, wheeling and cycling	376–378	We welcome the measures in this policy which are in alignment with the London Plan and the Sustainable Transport, Walking and Cycling LPG. We recommend including the maps of the planned walk and cycle networks as part of the supporting text.	520–523	The comments made in our response to the Regulation 18 consultation remain valid.
Policy T3 Public Transport	378–379	Part A – We welcome this statement although we recommend that bus stands and drivers facilities are added to the list of infrastructure so that it reads as follows: ‘To safeguard and promote the provision of public transport in the borough the Council will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, <u>bus stands, drivers’ facilities, real time passenger information</u> , signage, and timetable information.’	524–526	We note that Part A of the policy has been modified to state ‘bus infrastructure’ in lieu of listing relevant bus infrastructure. It would aid the effectiveness and clarity of the policy to reinstate the list, including the proposed additions in our response to the Regulation 18 consultation as part of the supporting text. Paragraph 14.30 – We strongly welcome the addition that passenger transport interchange facilities should be designed and delivered in accordance with Transport for London’s Interchange Best Practice Guidelines.

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		<p>Part B – We welcome confirmation that ‘Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments and the provision of improved public transport infrastructure including bus shelters and passenger information, and step free access at stations in the borough.’ We additionally welcome the explicit reference to securing contributions towards providing step-free access at stations in the borough.</p> <p>Part C – We welcome the requirement for developments, as appropriate, to facilitate and improve interchange opportunities. The policy or supporting text could additionally refer to TfL’s Interchange Best Practice Guidelines, available at: https://content.tfl.gov.uk/interchange-best-practice-guidance-2021.pdf</p>		
Policy T4 Shared Transport Infrastructure and Services	379-381	<p>Part A – We broadly welcome the approach to shared transport infrastructure and services including the commitment in part i. to ‘work with Transport for London to expand and improve the Santander cycle hire docking station network in the borough.’ However, caution may be required with part vi. ‘work with car club operators to expand and improve the network of car club bays in the borough, including the provision of electric car club vehicles where possible.’ Given the requirement for car free development, car clubs are best targeted at areas that are less well-connected and have higher rates of car ownership where they can substitute for private vehicles. Car club spaces count towards parking provision in new developments and would therefore not be appropriate</p>	527-529	<p>Our comments made in response to the Regulation 18 consultation remain valid. While car clubs are potentially able to reduce car use and ownership in areas which currently have high rates of car ownership (when paired with a reduction in general car parking), the opposite is potentially true in areas which have low rates of car ownership. This could ultimately have the opposite of the desired effect to restrain car use in parts of Camden, particularly should car clubs become readily available on demand.</p>

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		<p>generally, and less so in well-connected locations with a choice of active travel and public transport alternatives because of the potential risk of encouraging car use which would otherwise might not happen.</p> <p>We would be interested to see the methodology and outputs of the Shared Transport Access Level in Camden (STALC) work which is referenced in the supporting text.</p>		
Policy T5 Parking and Car Free Development	381-383	<p>Part A – We strongly support the policy that ‘The Council will limit the availability of parking and require all new developments in the borough to be car-free.’ It is important for any car club provision to be consistent with this, for example, if car clubs were provided in locations where the overall supply of parking is reduced, this could be in line with the spirit of reduced car ownership and vehicle dominance.</p> <p>Part iic – As noted under T4, car club spaces may not be appropriate for car free developments in well-connected locations and could encourage car use, contrary to the overall aims of the policy. Car club spaces should not be permitted in areas which the London Plan requires to be car free, as only blue badge car parking is permitted such developments.</p> <p>Part v – We strongly support the redevelopment of existing car parks for alternative uses. This should be expanded to include redevelopment of vehicle storage areas such as garages above and below ground and the repurposing of individual car parking spaces both on and off street, including the removal of redundant crossovers.</p> <p>Part vi – The wording should be clarified as follows: <u>‘where residential estates are redeveloped</u>, reduce on-</p>	530-532	<p>Part A – We welcome the amendments made in line with our response to the Regulation 18 consultation.</p> <p>Part 6 – As per our Regulation 18 comments, we would like to reiterate that the wording of the policy should be clarified as follows: <u>‘where residential estates are redeveloped</u>, reduce on-site parking, as far as possible, <u>with a plan for the redeveloped site to eventually be car free as part of re-development schemes</u>.’ The London Plan is clear that where sites are redeveloped the most up to date parking standards should be applied. The car free requirement of this Local Plan policy should be applied to all residential and commercial redevelopments except where existing residents with entitlements to parking permits are rehoused as part of an estate redevelopment. The amended wording would be consistent with paragraph 14.48.</p>

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		<p>site parking, as far as possible, with a plan for the redeveloped site to eventually be car free as part of re-development schemes. The London Plan is clear that where sites are redeveloped the latest parking standards should be applied. The car free requirement of this Local Plan policy should be applied to all residential and commercial redevelopments except where existing residents with entitlements to parking permits are rehoused as part of an estate redevelopment. The amended wording would be consistent with para. 14.33.</p> <p>Para. 14.30 – We welcome clarification that ‘Staff parking is not considered essential and will not be permitted.’</p>		
Policy T6 Sustainable Movement of Goods, Services and Materials	383– 386	<p>Part A – We support an approach that encourages movement by bicycle, canal and rail where possible, including provision for cargo bikes. In part v, the priority order should be foot, cargo bike or zero emission vehicles because even zero emission vehicles take up space within the development and the street thereby contributing to congestion.</p> <p>We welcome the requirement in part ii for cargo cycle parking in major developments, although this should be in addition to wide-spaced Sheffield stands for non-standard cycles expected in new developments. We also welcome the requirement in part iii for contributions towards new and improved cycle infrastructure for logistics developments resulting in additional cargo cycle movements, including exploration of the provision of loading and short-term parking spaces for cargo cycles to facilitate their use in a way that is safe and non-disruptive for others, in particular people walking and using buses.</p>	533– 538	<p>Part A.5 – We welcome the amendments made to the priority order in line with our response to the Regulation 18 consultation.</p> <p>Part B.3 – The comments made in our response to the regulation 18 consultation remain valid. We would like to reiterate our point on the consistent use of the terms Construction Logistic Plans and Delivery Servicing Plans throughout the Local Plan to provide better clarity for readers. This is in accordance with the London Plan and TfL Guidance.</p> <p>Paragraph 14.58 – We welcome the clarification that any cycle infrastructure to support cargo bike usage should be provided in addition to wide-spaced Sheffield stands for non-standard cycles.</p>

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		<p>In part vii. Care should be taken in the location and design of micro mobility hubs and urban logistics hubs so that they do not attract vehicles into areas designed primarily for walking and cycling. We therefore welcome the statement in 14.49 that 'The Council will seek to secure contributions towards the provision of freight consolidation hubs and micro mobility hubs where such provision would result in reduced vehicle trips and impacts on the environment.'</p> <p>Part B – We recommend the consistent use of the terms Construction Logistics Plans and Delivery and Servicing Plans throughout the Local Plan in accordance with the London Plan and TfL guidance.</p>		
Policy DMI Delivery and Monitoring		<p>Part A.vi – We welcome the commitment to 'using CIL, planning contributions and legal agreements where appropriate to:</p> <ul style="list-style-type: none"> a. support healthy and sustainable development b. secure the infrastructure, facilities and services to meet the needs generated by development c. mitigate the impact of development' <p>Para. 15.20 – The list of matters that are likely to be addressed through planning obligations should include 'public transport and active travel improvements' to ensure consistency with Local Plan policies T2 and T3 and London Plan policy DFI D which states that in setting policies seeking planning obligations priority should be given to affordable housing and necessary public transport improvements. This is important because some transport improvements such as contributions towards bus capacity or step free access cannot easily be addressed through CIL and should be explicitly identified in the list of planning obligation matters.</p>	540-546	We welcome the amendments made in line with our response to the regulation 18 consultation.

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		<p>Para – 15.23 We welcome the statement that ‘Pooled contributions will be used when the combined impact of development in an area creates the need for related infrastructure or works that will not be funded by CIL.’</p> <p>This is particularly relevant to transport improvements such as step-free access, bus capacity or Healthy Streets improvements.</p>		