

GREATER LONDON AUTHORITY

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Department: Planning
Our reference: LDF06/LDD23/CG01
Date: 27 March 2020

Sent by email to: planningpolicy@camden.gov.uk

Dear Brian

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Draft Camden Site Allocations Local Plan February 2020

Thank you for consulting the Mayor of London on Camden's Draft Site Allocations Local Plan. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to provide comments on the emerging Local Plan on his behalf. Transport for London (TfL) has provided comments, which I endorse, and are attached to this letter as Annex 1.

The draft new London Plan

As you know, the Mayor published his draft new London Plan for consultation on 1st December 2017. The Panel's report, including recommendations, was issued to the Mayor on 8th October 2019 and the Intend to Publish London Plan was published on the 17th December 2019. Publication of the final version of the new London Plan is anticipated in Summer 2020, at which point it will form part of Camden's Development Plan and contain the most up-to-date policies.

The Mayor has received the response from the Secretary of State to his Intend to Publish London Plan and is considering his response. In due time, my officers will be happy to discuss any implications for Camden's Site Allocations Local Plan, particularly in relation to Intend to Publish London Plan Policies E4 and E7 which are referenced in my letter below.

Camden's Site Allocation Plan Development Plan Document will be required to be in general conformity with the new London Plan.

General

The Mayor welcomes the preparation of Camden's Site Allocations Local Plan and its contribution to Good Growth and implementing Camden's Local Plan 2017. However, at this stage the Mayor cannot determine whether the Site Allocations Local Plan is fully aligned with the Intend to Publish London Plan. He is concerned about the potential loss of industrial capacity across the borough as well as the potential quantum of office space proposed outside the Central Activities Zone (CAZ) or a town centre.

To gain an understanding of the quantum of non-residential floorspace proposed, Camden should set out the quantum of industrial capacity to be redeveloped, the quantum of industrial capacity to be re-provided, including the Use Class and the quantum of B1(a) office to be provided, and on which sites or sub-areas. In addition, Camden should clarify what uses are included under 'employment' and 'commercial' within the site allocations. For industrial use, Camden should be clear that this includes B1(c), B2 and B8 as well as other industrial uses as set out in Intend to Publish London Plan Policy E4 and its supporting text.

The Mayor welcomes the references to the Neighbourhood Plans for the relevant sub-area. Any Site Allocations identified in the Neighbourhood Plans should be reflected in this document, subject to consistency with the Intend to Publish London Plan.

Industrial land

The Intend to Publish London Plan places a strong emphasis on protecting and increasing industrial capacity in line with the London Industrial Land Demand Study 2017 (CAG). London, including the CAZ depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system which can respond to business and consumer demands. Industrial land and floorspace provides the capacity for these activities to operate effectively. In 2015, London had an estimated 6,976 hectares of land in industrial and related uses of which about 36 per cent was in Non-Designated Industrial Sites which are not designated in Local Plan policies maps.

Over the period 2001 to 2015, more than 528 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was released to other uses. This was well in excess (280 per cent) of the previously established London Plan monitoring benchmarks of 37 hectares per annum set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). Research for the Greater London Authority (GLA), the London Industrial Land Demand Study 2017 (CAG), indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, mostly driven by strong demand for logistics to service growth in London's economy and population. This has been recognised in the Panel Report which noted that demand for industrial land was probably greater than that identified through the new London Plan and this was likely to be due to a greater demand for B8 floorspace. Spatially, the Panel stated there will likely be long term need for new industrial sites in certain locations, including in and around the CAZ.

Camden's Local Employment Review (LER) 2014¹ noted that Camden has one of the smallest amounts of industrial floorspace across London and has been losing industrial stock rapidly, whilst demand is high and unlikely to wane. The key reason for the positive and sustained level of demand is Camden's strategic location near the CAZ. This is despite the conclusion of Camden's LER 2014 that there was a potential decrease in demand equivalent to 2.2ha of industrial floorspace. However, this study is potentially out of date and uses an employment based methodology instead of an economic growth based projection which the GLA believes is more appropriate for assessing the demand for industrial floorspace, particularly for servicing, distribution and logistics activities.

Camden's LER 2014 states that the cumulative effect of loss of industrial land in central London boroughs would increase inefficiencies, for example in logistics; costs would be likely to increase and reliability issues would likely arise. The LER notes the potential to improve and modernise the existing industrial stock, including those owned by the Council. In this regard, the Mayor supported Camden's Local Plan policies that seek to protect employment floorspace and the retention of industry, light industry, and warehousing/ logistic uses that support the function of the CAZ and the local economy. Planning permission has already been granted by the Council for the loss of numerous industrial sites.

Recent changes to the Planning Practice Guidance (Paragraph: 031 Reference ID: 2a-031-20190722) require planning authorities to assess the need and allocate space for logistics. In this regard, it would be useful for Camden to revise its LER, especially in light of the 20ha of industrial land identified for redevelopment through this Site Allocations Local Plan.

Given Camden's part location in the CAZ, there should be a focus in the Sites Allocations Local Plan on the provision of essential services to the CAZ, and in particular sustainable 'last mile' distribution/logistics, 'just in time' servicing, waste management and recycling and land to support transport functions and therefore Class B8 uses should be prioritised in line with Intend to Publish London Plan Policies E4 and SD4M.

On existing industrial sites, the re-provision of industrial capacity should be the priority use, as once lost to other uses it is unlikely that industrial uses can be reintroduced to meet demand over the plan period. Where there is no masterplan or where the Site Allocation does not set out a clear quantum of industrial capacity to be re-provided the site should not be allocated so that Intend to Publish London Plan Policy E7C(2) would not apply.

To protect well-functioning industrial sites Camden should instead refer to Intend to Publish London Plan Policy E7C(3) to facilitate the long term functioning of the London and local economy.

Some non-designated industrial sites have been identified in the London Strategic Housing Land Availability Assessment² (SHLAA) as contributing to Camden's 10-year housing target. The London SHLAA³ provides an understanding of potential housing capacity across London. It uses a mix of sources and assumptions and was developed in response to London's dynamic land market. While it used site specific information, it is not a site allocations exercise. The sites' information is used to provide an understanding of aggregate potential housing capacity

¹ <https://www.camden.gov.uk/documents/20142/15788074/Employment+land+review+2014.pdf/834735a1-6edb-da57-f116-0c42ff8b5d69>

² https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

³ https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

at a borough level at a point in time. A site's inclusion or exclusion from the SHLAA does not dictate if it will (or should) come forward for housing development, or not. The approach provides a robust understanding of overall housing capacity across London. Camden's Site Allocation Local Plan includes sites that were included in the SHLAA as well as sites that were not. A site's inclusion in the SHLAA does not preclude co-location.

The Mayor's Industrial Intensification Primer⁴ and Industrial intensification and co-location study: design and delivery testing (Good Growth by Design)⁵ sets out potential options for intensifying industrial sites and co-location with residential development. Where industrial capacity is to be lost, the site allocation should be clear that the affordable housing threshold is 50% in line with Intend to Publish Policy H5; and where residential development is introduced in existing industrial areas/clusters, the Agent of Change principle needs to be applied in line with Intend to Publish London Plan Policy D13.

Camden's Site Allocations Local Plan should clearly set out the quantum of industrial capacity to be provided on each site or within each sub-area and in particular, specify the quantum of B8 logistics to be re-provided where this is an existing activity on the site/area.

The Mayor would welcome masterplans that clearly set out how industrial capacity will be retained and intensified in line with Intend to Publish London Plan Policies E4 and E7.

Offices

The Mayor is also concerned about the potential quantum and type of office floorspace to be provided outside the CAZ and outside Camden's town centres. Whilst the locations are generally within Camden's identified Growth Areas as identified in its Local Plan, Camden should clearly set out the quantum and nature of office floorspace to be provided on each site or within each area. The type of office provision should reflect the nature of the area. For example, larger A grade offices should be concentrated in the CAZ with smaller units in other areas.

Intend to Publish London Plan Policy E1 sets out that outside the CAZ and Opportunity Areas, offices should be directed to town centres and the strategic approach is to consolidate office uses within town centres. Whilst many of the proposed office locations are within Camden's growth areas and adjacent to existing town centres, the Mayor is concerned whether there is an identified need for this quantum of office floorspace and whether a substantial provision of offices in Kentish Town will impact the long-term viability of nearby town centres. It is noted that the Murphy site is not within the Kentish Town Regis Road Growth area. Camden should carry out an assessment of the potential for office floorspace to be provided within nearby town centres, including those in neighbouring boroughs, and the potential impact of significant growth at Kentish Town.

Estate renewal

The Site Allocations Local Plan should clearly state that estate renewal schemes must adhere to Intend to Publish London Plan Policy H8 and provide at least an equivalent level of overall floorspace, and in particular affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Estate renewal schemes should take account of the requirements of the Mayor's Good Practice Guide to Estate Regeneration (2018).

⁴ <https://www.london.gov.uk/sites/default/files/industrialintensificationprimer.pdf>

⁵ https://www.london.gov.uk/sites/default/files/industrial_intensification.pdf

Gypsies and travellers

The Site Allocations Local Plan notes the demand for 16 Gypsy and Traveller pitches by 2031 with an immediate demand for seven pitches by 2020/21. The supporting text states that no sites have come forward to provide pitches. The Mayor strongly welcomes Camden’s proposal to undertake a comprehensive review of its own land and other suggested sites to identify potential sites for new pitches.

Site specific comments

Policy No.	Site Name	Mayor’s Comments
Knowledge Quarter		
Policy KQ1		<p>The policy should make a distinction between the sites in the CAZ, and those that are not. The quantum and type of development proposed should reflect the strategic location of the site.</p> <p>Welcome the aim to provide at least 20% of the additional employment floorspace as affordable workspace. In line with Intend to Publish London Plan Policy E3, affordable workspace should be secured by s106 agreements and managed by a workspace provider. The policy should be clear that this does not apply to additional industrial capacity, unless it is demonstrated through this Site Allocations Local Plan process that such an approach would be viable.</p>
Camden Goods Yard		
CG5Y	Juniper Crescent	The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor’s Good Practice Guide to Estate Regeneration.
CG6Y	Network Rail Site at Juniper Crescent	The Mayor would welcome the provision of industrial capacity on this site which could contribute to addressing the industrial demand in Camden.
CG7Y	Gilbey’s Yard	The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor’s Good Practice Guide to Estate Regeneration.
Camley Street and St Pancras Way Area		

CSP1	Camley Street and St Pancras Way Area	<ul style="list-style-type: none"> - whilst the Mayor welcomes the provision of housing in this area, Camden should firstly demonstrate that the industrial capacity can be re-provided, especially storage, servicing and logistics and functions that service the CAZ, in line with local and strategic evidence - the Mayor would welcome the development of a masterplan for this area in line with emerging London Plan Policy E7 - Camden should consider designating the industrial area as LSIS as its quantum and function is locally significant to Camden and the CAZ - transport improvements should ensure the area's industrial functions can still operate efficiently - where industrial capacity is lost, in line with Intend to Publish London Plan Policy H5, the affordable housing threshold is 50%
CSP2	120 – 136 Camley Street	<ul style="list-style-type: none"> - the site allocation should be clear that the industrial capacity is to be re-provided, unless it is consolidated onto another site through a masterplan - the potential quantum of office space should be specified to ensure overall, the quantum of office space does not undermine consolidation in the CAZ and town centres - where industrial capacity is lost, in line with Intend to Publish London Plan Policy H5, the affordable housing threshold is 50%
CSP3	104-114 Camley Street and Cedar Way Industrial Estate	<ul style="list-style-type: none"> - the site allocation should be clear that the industrial capacity is to be re-provided - the text needs to be clear that the full range of industrial uses that support the local and CAZ economies are appropriate, as set out in Intend to Publish London Plan Policies E4 and SD4M and their supporting text - the potential quantum of office space should be specified to ensure overall, the quantum of office space does not undermine consolidation in the CAZ and town centres - where industrial capacity is lost, in line with Intend to Publish London Plan Policy H5, the affordable housing threshold is 50%
CSP4	Parcelforce and ATS Tyre Site	<ul style="list-style-type: none"> - the site allocation should be clear that the industrial capacity is to be re-provided - the text needs to be clear that the full range of industrial uses that support the local and CAZ economies are appropriate, as set out in Intend to Publish London Plan Policies E4 and SD4M and their supporting text - the potential quantum of office space should be specified to ensure overall, the quantum of office space does not undermine consolidation in the CAZ and town centres - where industrial capacity is lost, in line with Intend to Publish London Plan Policy H5, the affordable housing threshold is 50%
CSP6	Shorebase Access Site	<p>The methodology for the London Industrial Demand Study included land for transport infrastructure. Camden should ensure it has met its industrial demand before this site is released from industrial use or the site allocation should include the provision of B1(c) in this location</p> <ul style="list-style-type: none"> - where industrial capacity is lost, in line with Intend to Publish London Plan Policy H5, the affordable housing threshold is 50%

CSP7	Other development sites in Camley Street	<ul style="list-style-type: none"> - it is unclear what the existing uses are for these sites. - any industrial capacity should be re-provided, unless it has been consolidated as part of a masterplan - the term 'commercial' should be clarified - the potential quantum of office space should be specified to ensure overall, the quantum of office space does not undermine consolidation in the CAZ and town centres - The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor's Good Practice Guide to Estate Regeneration and that the affordable housing threshold for public land is 50%
Holborn and Covent Garden Area		
HCG1	Holborn and Covent Garden Area	<ul style="list-style-type: none"> - welcome the recognition of Tottenham Court Road as an Opportunity Area, shared with Westminster, as set out in the London Plan. Growth here will be supported by the Elizabeth Line - welcome the preparation of an urban design study - welcome the aim for active frontages with a broad variety of town centre uses - welcome the aim to increase green infrastructure in line with intend to Publish London Plan Policy G5
HCG4	134-149 Shaftsbury Avenue	- welcome the identification of the site for a theatre/cinema
HCG5	Holborn Library and Cockpit Yard	The site at Cockpit yard appears to be light industrial / maker space. These uses should be re-provided.
Kentish Town Area		
KT1	Kentish Town Area	<ul style="list-style-type: none"> - whilst the Mayor welcomes the provision of housing in this area, Camden should firstly demonstrate that the industrial capacity can be re-provided, especially logistics services - the Mayor would welcome the development of a masterplan for this area in line with emerging London Plan Policy E7 - transport improvements should ensure the area's industrial functions can still operate efficiently - where industrial capacity is lost, in line with Intend to Publish Policy H5, the affordable housing threshold is 50%

KT2	Regis Road Growth Area	<ul style="list-style-type: none"> - welcome the retention or re-provision of the safeguarded waste facility. The list of proposed uses should include waste. - the site allocation should be clear that the industrial capacity is to be re-provided - the policy should be clear on the type and quantum of industrial floorspace to be re-provided - the text needs to be clear that the full range of industrial uses that support the local and CAZ economies are appropriate, as set out in Intend to Publish London Plan Policies E4 and SD4M and their supporting text - it is unclear what land uses 'employment' includes. The potential quantum of office should be specified to ensure overall the consolidation of office space in the CAZ and the local and strategic network of town centres is not undermined - where industrial capacity is lost, in line with Intend to Publish Policy H5, the affordable housing threshold is 50%
KT3	Murphy Site	<ul style="list-style-type: none"> - the policy should identify this site as LSIS and set out the quantum of industrial floorspace to be provided to contribute to meeting Camden's demand for industrial floorspace - the policy should be clear on the type and quantum of industrial floorspace to be provided - it is unclear what land uses 'employment' includes. The potential quantum of office should be specified to ensure overall the consolidation of office space in the CAZ and the local and strategic network of town centres is not undermined
KT5	369-377 Kentish Town Road (car wash site)	<ul style="list-style-type: none"> - This site is industrial in nature. Its industrial capacity could be pre-provided on Site Allocations KT2 and/or KT3. - where industrial capacity is lost, in line with Intend to Publish policy H5, the affordable housing threshold is 50%
West Hampstead Interchange Area		
WH13	13 Blackburn Road	<ul style="list-style-type: none"> - this site is identified as industrial in Camden's LER 2014, therefore Camden should seek co-location with industrial uses on this site - as this site is not in a town centre, Camden must assess the capacity of the adjacent and nearby town centres to supply office capacity before seeking a town centre use (offices) outside a town centre
WH14	188-190 Iverson Road	<ul style="list-style-type: none"> - welcome the retention of a light industrial use of this site. The minimum quantum to re-provided should be specified - as this site is not in a town centre, Camden must assess the capacity of the adjacent and nearby town centres to supply office capacity before seeking a town centre use (offices) outside a town centre
Individual sites		
IDS4	85 Camden Road	This site appears to be outside a town centre and therefore any replacement retail floorspace should be limited.
IDS6	Camden Town over station development	Welcome the inclusion of maker spaces / creative industries under the proposed uses.
IDS9	202 – 204 Finchley Road	Welcome the inclusion of light industrial under the proposed uses.

IDS11	Wendling Estate and St Stephens Close	The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor's Good Practice Guide to Estate Regeneration.
IDS13	West Kentish Town Estate	The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor's Good Practice Guide to Estate Regeneration.
IDS12	Former Mansfield Bowling Club	Support the re-provision of a public open space and a sporting or recreation facility
IDS16	Belgrove House	This site is non-designated industrial land. B8 uses are essential to the functioning of London's economy and the B8 capacity on this site should be retained.
IDS18	Land bounded by Pakenham Street and Wren	This site appears to be non-designated industrial land. There is a significant demand for industrial capacity and therefore the site allocation should require replacement industrial capacity.
IDS20f	Jamestown / Arlington Road depot	Welcome proposed uses of light industrial / depot. The site allocation should be clear what quantum of industrial capacity is to be re-provided.
IDS20s	11-12 Ingestre Road	Welcome the continued use of this site for assisted living housing – 50 additional units
IDS20t	Eastman Dental Clinic	Welcome the allocation of this site for student housing to contribute to meeting local and strategic need.
IDS20z	Liddell Road Industrial Estate	Welcome proposed uses of light industrial. The site allocation should be clear that quantum of industrial capacity is to be re-provided.

Next stages

I hope that these comments can inform the development of Camden's revised Site Allocations Local Plan. If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss any of the issues raised. The Mayor will provide his opinion on general conformity with the London Plan at the Regulation 19 stage.

Yours sincerely,



Debbie Jackson

Director – Built Environment

Cc Andrew Dismore, London Assembly Constituency Member
 Andrew Boff, Chair of London Assembly Planning Committee
 National Planning Casework Unit, MHCLG
 Lucinda Turner, TfL



London Borough of Camden

TfL Ref: CMDN/20/12

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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
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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 WH1- 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 WH1 (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.’

London Borough of Camden
Strategic Planning
5 Pancras Square
London
N1C 4AG

Department: Planning

Our reference: LDF06/LDD25/LP02/JB01

Date: 13 March 2024

By email: planningpolicy@camden.gov.uk

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local
Development) (England) Regulations 2012**

Re: London Borough of Camden Local Plan Regulation 18 Consultation.

Dear Brian,

Thank you for consulting the Mayor of London on the proposed New Local Plan for Camden (Regulation 18) consultation. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. A separate detailed response has been prepared by Transport for London Spatial Planning on transport matters.

This letter provides advice and sets out where you should make amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021). The LP2021 was formally published on the 2 March 2021, and now forms part of the London Borough of Camden's (LBC's) Development Plan and contains the most up-to-date policies.

The GLA are happy to work with LBC following on from this consultation and prior to the next round of consultation to help resolve these issues.

Opportunity Areas and Central Activities Zone

LBC contains three Opportunity Areas identified in the London Plan at Tottenham Court Road, Kings Cross and Euston. The draft Plan states that both Tottenham Court Road and Kings Cross are largely complete and there is unlikely to be significant further development in the plan period.

Table 2.1 in the LP2021 sets out an indicative capacity for 2,800 – 3,800 homes in the Euston Opportunity Area along with 8,600 – 15,000 jobs. As set out in paragraph 2.1.1 of the LP2021, these figures should be used as a starting point to be tested through the assessment process. Currently, the strategy for the Euston Opportunity Area is still being developed, with an Area Plan scheduled to follow in the summer of 2024. However, it is

recommended that the draft Plan provides an outline of what is expected to come forward in the Euston Area with indicative capacities and a clearer definition of the boundaries of the Opportunity Area. This will help to reflect the importance of the Euston Area in the overall strategy and provide a certain level of clarity while the Area Plan is being developed.

Within LBC is an area of the Central Activities Zone (CAZ), as defined in Policy SD4 of the LP2021. Part N of Policy SD4 sets out that Development Plans should look to define the boundary in detail and included on policy maps. As per Policy SD5 of the LP2021, the draft Plan should ensure that residential development within in the CAZ does not compromise the strategic uses as set out in paragraph 2.4.4 of the LP2021. Part G of SD5 also sets out that any mixed-use development within the CAZ should not lead to a net loss of office floorspace and the use of land use swaps, credits and off-site contributions should also be explored as per Part H.

Housing

Table 4.1 of the London Plan Policy H1 sets out a 10-year target of 10,380 new homes to be delivered from 2019/20 until 2028/29 within LBC, equivalent to 1,380 homes per year. Included in this target, a minimum 3,280 new homes should be identified from small sites (set out in Table 4.2 of the LP2021). The draft Plan should include a clear commitment to meet its LP2021 housing target by 2029 being clear how they will achieve that.

Policy H1 of the draft Plan sets out a target of 11,550 new homes over a 15 year plan period of 2026 to 2041, equivalent to 770 homes per year. This is significantly below the current annualised London Plan target and is of concern.

The draft Plan states that this figure is derived from rolling forward the small sites target as per Table 4.2 of the LP2021 across the plan period as well as taking into account the capacity of large sites in the 2017 SLHAA referenced in paragraph 4.1.11 of the LP2021. However, it should be noted that there is greater uncertainty on sites contained within the 2017 SLHAA that were expected to come forward in the later phases and new sites might have become available since the SLHAA was carried out.

Paragraph 4.1.11 also sets out that when calculating a housing target beyond 2029, London boroughs should also include additional capacity that could be delivered as a result of any committed transport infrastructure improvements, as well as additional sites that have come forwards as part of the borough's call for sites. Further to this, LBC should be aware of the ongoing SLHAA work (referred to as LAND4LDN) that is part of the review of the London Plan and any sites that might be identified as the process continues.

In determining capacity, Objective GG2 of the LP2021 sets out the importance of making the best use of land within London, with Part C promoting higher densities in areas that are well connected to infrastructure and jobs. LBC should ensure that in the evidence base to support the draft Plan, densities are set at an appropriate level making the best use of land.

Policy H1 in the draft Plan should also set out whether there has been a shortfall in delivery since 2019 and factor this into the overall housing need. Any shortfall should be made up

over the remaining time up to 2029 to account for the whole London Plan housing target period.

While the draft Plan recognises that a forthcoming review of the London Plan would likely change the housing target for LBC, which is welcomed, it is recommended that there is flexibility in the draft Plan to safeguard for this eventuality. It is also noted that the current London Plan does not meet London's identified need and therefore the overall amount of housing required annually should not be expected to reduce.

Small Sites

Due to the importance of the delivery of homes on small sites in the borough, the Mayor's LPG on Small Sites Design Codes and Optimising Site Capacity: A Design Led Approach¹ provides guidance to help boroughs capitalise on the ability of small sites to contribute towards housing delivery. The Mayor welcomes LBC referencing the LPG within the draft Plan. It will be crucial in light of the overall low housing figures to ensure that LBC's policy framework provides a positive and clear approach to drive up delivery of homes on small sites.

Affordable Housing

Policy H4 of the draft Plan reflects the Mayor's strategic target that 50% of all housing is to be affordable, which is welcomed. The draft Plan sets out a sliding scale to secure affordable housing contributions, using a floorspace based approach rather than habitable rooms to calculate the percentage of contribution required increasing in 2% increments for every additional 100sqm (equivalent to 1 unit) for schemes under 25 units. LBC should note that the required level of affordable housing should be based on gross residential development and not on net increases in housing as currently set out in Part B of Policy H2 in the draft Plan. Paragraph 4.5.3 of the LP2021 is clear that in some cases it may be appropriate to use habitable floorspace as a measure of affordable housing. The definition of what constitutes habitable floorspace is included in the glossary of the LP2021 and should be the one applied in the draft Plan.

The sliding scale approach is not in line with Policy H5 of the LP2021 which sets out the Threshold Approach to affordable housing contributions. The Threshold Approach seeks to limit those circumstances where viability evidence is required by providing an incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route, thereby avoiding scrutiny of viability at various stages of development. The threshold set in Policy H5 has been informed by viability testing and embeds affordable housing requirements into land values which creates consistency across London.

It is also unclear whether the draft Plan takes account of LP2021 Policy H5, in relation to the threshold levels of 50% for affordable housing on publicly owned sites and designated industrial sites, where there is a net loss of industrial capacity in order to qualify for the Fast

¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63501>

Track Route. The proposed approach also does not account for those sites where there is a portfolio agreement with the Mayor.

The sliding scale approach to affordable housing in the draft Plan may result in more applications following the Viability Tested Route. On average this route provides less affordable housing and results in longer determination times when compared to those that take the Fast Track Route.

Policy H5 of the LP2021 has been proven effective at securing affordable housing with the 2022 Annual Monitoring Report establishing that 84% of all strategic applications provided at least 35% affordable housing, this represents an increase from 53 per cent of schemes in 2018. The average rate of affordable homes per scheme was 41 per cent of all units and 45 per cent of all habitable rooms.

On average schemes that were referable to the Mayor that followed the Fast Track Route provided 44 per cent affordable housing in 2022, whereas viability tested schemes provided only 28 per cent. Applicants also typically seek to demonstrate the existence of 'viability deficits' through the viability assessment process and use these as a credit in viability review mechanisms which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development.

LBC should consider if there is an opportunity for the proposed sliding scale approach to be combined with the Mayor's Threshold Approach. The policy should also reflect the different threshold levels of affordable housing required to qualify for the Fast Track Approach on different sites as set out in LP2021 Policy H5 Part B. As currently written, the policy could be a potential General Conformity issue with the LP2021.

Gypsy and Traveller Accommodation

Draft Plan Policy H11 sets out that LBC have identified the need for 16 additional pitches for the Gypsy and Traveller community through the 2014 accommodation assessment. The draft Plan should use site allocations to explore opportunities to meet this need. As set out in Policy H14A of the LP2021 LBC should plan to meet identified need and must include the ten-year pitch targets.

Tall Buildings

Policy D2 of the draft Plan sets out LBC's approach to tall building development within the borough. At part A the policy defines tall buildings as those which are greater than 40m in the Central Activities Zone and over 30m elsewhere. This is consistent with Policy D9 of the LP2021 and is welcomed. Map 13 sets out the threshold for when a development is considered to be 'tall' in two separate areas. This is in line with D9 of the LP2021. However, when identifying the specific locations suitable for tall buildings, the policy does not identify the appropriate suitable height in each of the different locations but has this information in the specific site allocations.

LBC should consider whether it would be more appropriate to identify areas, rather than specific sites (for which boundaries might change in the future), as suitable for tall buildings.

This is particularly relevant where the draft Plan identifies several adjoining sites as separate areas on Map 13. LBC should also identify the harm that would arise as a result of a tall building being proposed outside the identified areas or sites and should not exclude areas where harm cannot be identified. This documentation will be critical for considering any planning applications for tall buildings that come forward outside identified areas in future. LBC should assess whether areas surrounding identified sites are also suitable for tall buildings, especially where they share similar townscapes.

It would make the policy much clearer if the information on suitable heights in the identified areas was contained within the policy text itself rather than in the site allocations and appendix to the draft Plan.

Industrial and Employment Land

Policy IE3 of the draft Plan sets out it will 'manage and protect' industrial and warehousing land, although some sites could be redeveloped to deliver wider objectives. Part C of Policy IE3 sets out the factors that redevelopment of industrial sites should pay regard to in the application process. This is in line with Policy E4 of the LP2021 which sets out the importance of having sufficient industrial uses due to their roles in supporting London's economy. Part C of Policy IE3 sets out that any releases of industrial land, including non-designated sites, should be facilitated through intensification, co-location and substitution as per Policy E7 of the LP2021.

The draft Plan should note the significance of its location in the Central Services Area (CSA). Paragraph 6.4.7 of the LP2021 makes it clear that all boroughs in the CSA should recognise the need to provide essential services to the CAZ and in particular sustainable 'last mile' distribution/logistics, 'just-in-time' servicing, waste management and recycling, and land to support transport functions.

The draft Plan should be clearer on how much additional industrial land in LBC is required in order to meet demand in the borough over the plan period given the low levels of vacancy as per the London Industrial Land Supply Study 2020² and how this will be delivered through individual planning applications and site allocations.

Policy IE3 is broadly in line with the LP2021 Policies E4 and E7 which seek to ensure there is sufficient industrial sites within London, and that existing sites are intensified where suitable. However, there is concern over site allocation C3 KT3. This allocation covers LBC's one designated Industrial Area, which is equivalent to the LP2021 Local Strategic Industrial Site (LSIS) designation. The allocation should set out more detail on the amount of industrial space currently on site and the amount that would be expected post-development in order to maintain the area as a viable industrial location. Similarly, sites on Camley Street and Regis Road both provide significant industrial floorspace, including uses B8, which should be retained through co-location and because of LBC's location in the CSA.

² [London Industrial Land Supply Study 2020 Main Report](#)

GREATER LONDON AUTHORITY

Policy E4C of the LP2021 advocates a plan, monitor and manage approach towards industrial land and capacity. In light of this, LBC should commit to producing a monitoring framework for industrial capacity in the borough which will help to inform decision making.

Office Space

The draft Plan identifies the need for 340,000sq.m. of office space over the plan period with 210,000sq.m. of this total already in the planning pipeline. Policy E1 of the LP2021 supports the development of new office space where there is demonstratable need, and it should be focused within the Central Activity Zone (CAZ), town centres and Opportunity Areas. The draft Plan and site allocations should reflect the focus of office into these locations in order to take advantage of existing infrastructure and connectivity and avoid allocations outside of these areas as the draft currently does.

Next steps

I hope these comments help to inform the preparation of LCE's Local Plan. We continue to offer our support to work with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021, as well as delivering the Council's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Jonathan Blathwayt on 020 7983 4000 or at jonathan.blathwayt@london.gov.uk.

Yours sincerely



Lisa Fairmaner

Head of London Plan and Growth Strategies

Cc: Anne Clarke, London Assembly Constituency Member
Sakina Sheikh, Chair of London Assembly Planning and Regeneration Committee
National Planning Casework Unit, DLUHC

GREATER LONDON AUTHORITY

Rebecca Burden

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Department: Planning

Our reference LDF06/LDD25/LP04/AT01

Date: 12 June 2025

By email: planningpolicy@camden.gov.uk

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local
Development) (England) Regulations 2012****Re: Camden Local Plan (Regulation 19) consultation**

Dear Rebecca,

Thank you for consulting the Mayor of London on the London Borough of Camden's (LBC's) proposed Draft Submission Local Plan (Regulation 19). As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24(1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below.

The Mayor provided comments on the earlier LBC Local Plan (Regulation 18) consultation on 13th March 2024 (LDF06/LDD25/LP02/JB01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is in general conformity and more closely aligned within the London Plan 2021 (LP2021). These comments should be read alongside the Mayor's previous response.

General

The draft Local Plan is underpinned by a series of strategic objectives to help deliver the vision and ambitions of 'We Make Camden', which is a document that sets out the vision for the future of Camden. The strategic objectives of the draft Local Plan are broadly supported.

However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan due to the proposed housing targets over the Plan period. Further detail on this is provided in the subsequent section of this letter.

Opportunity Areas

LBC contains three Opportunity Areas (OAs) identified within LP2021 – Tottenham Court Road, Kings Cross and Euston. The draft Plan states that limited development is expected in the Tottenham Court Road OA as development there is largely complete, with development in the King's Cross Area mainly delivered through two site allocations.

GREATER LONDON AUTHORITY

Table 2.1 of LP2021 sets out an indicative capacity for 2,800-3,800 homes in Euston OA along with 8,600-15,000 jobs. As set out in paragraph 2.1.1 of the LP2021, these figures should be used as a starting point to be tested through the assessment process. The draft Plan identifies that Euston is expected to deliver between 1,500 and 2,500 new homes. Noting that the indicative capacity is below that identified within Table 2.1, clarity on the capacity assumptions made for the Euston area by LBC would be welcomed.

Draft Policy S2 seeks to ensure that development within this area is in line with the vision and objectives set out within the Euston Area Plan (EAP). Consultation (Regulation 18) on the draft Euston Area Plan was undertaken in March 2023. It is understood LBC is working towards consulting on the Regulation 19 version of the updated Plan in Winter 2025.

Housing

LBC's housing target as set out in Table 4.1 of the LP2021 is for the delivery of 10,380 new homes between 2019 and 2029 and incorporates a small site housing target of 3,280 new homes. This is equivalent to an annualised target of 1,038 homes a year.

For LBC's entire Plan period, 2026-2041, it is the intention to deliver 11,550 new dwellings. This is equivalent to a total of 770 homes being delivered a year. The proposed drop in the housing target is considered significant and is not consistent with paragraph 0.0.21 of the LP2021 which is clear that boroughs should only alter their housing targets where they have evidence demonstrating that they can exceed them.

The draft Plan states that this figure has been derived from the period of 2026 to 2029 of the London Plan, the housing capacity from large sites as set out in 2017 SHLAA, and the small sites target of 328 new homes per year set out within LP2021. The draft Plan indicates that cumulative backlog from under-delivery of completed homes from 2019/20 has also been taken into account, which has been identified as a little over 1,700 homes by April 2026.

As noted in the Regulation 18 consultation response, the current London Plan does not meet London's identified need and therefore the overall amount of housing required annually should not be expected to reduce. Whilst the above approach is in line with London Plan paragraph 4.1.11, in the context of working towards delivering 88,000 homes per annum as calculated at a national level through the standard method, this approach (specifically the text in 4.1.11) is now considered to be out of date. Boroughs who are currently working on their Local Plan, such as LBC, should seek, as a minimum, to roll over the current London Plan target beyond 2028/29, including any shortfall accrued to date, and to continue to take proactive measures to increase housing supply.

The draft Plan acknowledges that the emerging London Plan will result in a new housing target for Camden once adopted, and as such the housing target contained within the Local Plan may only be in place for a short period of time. Whilst this is welcomed, it is recommended that there is flexibility in the draft Plan to safeguard for this eventuality. Consideration may need to be given to committing to an early Local Plan review following the publication of LBC's new housing targets within the emerging London Plan. The difficult current delivery environment is also noted, including LBC's difficulties in bringing sites forward.

Affordable Housing

It is noted that the draft Plan identifies a borough wide delivery target of 3,000 additional affordable homes from 2026/27 to 2040/41.

GREATER LONDON AUTHORITY

The draft Plan sets a capacity-based approach to affordable housing, with this being detailed in draft Policy H4. The threshold for this Policy starts at 100sqm and the creation of at least one additional unit, with each additional 100sqm equating to the creation of one home. For smaller developments, a sliding scale target will apply, which is discussed in detail below.

For major developments, which have been defined within the draft Plan as being 16 units or more, draft Policy H4B5 states that the London Plan's strategic affordable housing target of 50 per cent will apply, but will be subject to the London Plan's viability threshold approach. Policy H4 of LP2021 refers to the strategic target of 50 per cent of all new homes delivered across London to be genuinely affordable. To achieve this aim, specific measures are identified, which include, but are not limited to, the requirement for major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach, using grant funding to increase affordable housing delivery, and for public sector land and industrial land resulting in a net loss of industrial capacity to deliver at least 50 per cent affordable housing.

Noting this, seeking to apply the strategic target in a site-specific way is an incorrect interpretation of Policy H4. It is also unclear how this would work: for example, how would the 'benefit' or incentive of meeting the 35 per cent threshold as set out in Policy H5 of the LP2021 be realised if negotiations continue past this point up to 50 per cent? It is recommended that the draft Policy H4B5 is amended to remove the reference to the strategic housing target.

A sliding scale for affordable housing contributions for smaller developments is also proposed, starting at 2 per cent for developments with capacity for one additional home, increasing by 2 per cent for each home, reaching an affordable housing target of 30 per cent affordable housing for 15 units. The Mayor raises significant concerns that seeking affordable housing below 10 units is unlikely to support small builders and diversify the housing market. Overall, this is likely to be counter-productive in terms of both housing delivery and affordable housing delivery.

In terms of seeking affordable housing contributions for development schemes delivering 10 to 15 units, whilst the approach set out in the draft Policy differs from LP2021, given it is likely to promote small builders and reduce the 'cliff edge' impacts, it is considered to be an appropriate flexibility.

It is noted that there are references to tenure split being applied flexibly within the supporting text of the policy. Tenure mix is a policy criterion for viability assessments; therefore, it is recommended that this wording is removed.

Draft Policy H4B(8) sets out that 'for the largest developments involving housing (typically those providing 100 homes or more), the Council may seek affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision'. This policy should be supported by evidence to ensure deliverability.

Draft Policy H4(E7) states that the LBC will take into account the economics and financial viability of the development when considering whether affordable housing provision should be made on-site. This policy should be tested at plan making stage and viability assessments should not generally be expected at application stage unless a scheme proposed a non-compliant level of planning obligations i.e. lower level of affordable housing, which is already covered in Part B of the same policy.

GREATER LONDON AUTHORITY

It is recommended that the policy wording within draft Policy H4(F) is clearer on what the triggers are for viability reviews. If the triggers are in line with the London Plan, then it is questioned whether it is necessary to replicate this policy within the draft Plan as the same London Plan policy already applies to all relevant development proposals.

Viability

LP2021 Policy DF1 identifies that affordable housing and necessary public transport improvements should be prioritised by decision makers when seeking planning obligations. There are a number of references within the policies and supporting text in the housing section of the local plan that refer to financial viability as a matter of consideration for development schemes. Whilst it is acknowledged that financial viability could be a material consideration, there is a concern that the references to such within the policy and supporting text could run counter and/or result in securing a lower level of planning obligations with applicants seeking to submit non-policy compliant schemes to justify the submission of viability information.

With this in mind, it is recommended that consideration is given to removing such references with the view of ensuring that viability testing is only used in a limited way as part of the decision-making process and that most applications would not be subject to protracted viability discussions in relation to a wide range of policy matters.

Specialist Older Persons Housing

Draft Policy H8 supports the development of, and resists the net loss of, specialised housing for older people, people experiencing homelessness and other people with care or support requirements. Whilst this is welcomed, the draft Plan should establish what the need is for specialist older persons housing. In the absence of a figure of need, LBC should rely on the Mayor's indicative benchmark figure which is set out in Table 4.3 of LP2021. For LBC, this is for the delivery of 105 units a year. In accordance with Policy H13 of the LP2021 LBC should work in collaboration with providers to identify sites which may be suitable for specialist older persons housing.

Gypsy and Traveller accommodation

Draft Policy H11 states LBC will aim to secure a sufficient supply of pitches/plots to meet the accommodation needs of Camden's established Traveller community over the Plan period to 2041. This is welcomed. The draft Plan identifies a need for 19 additional pitches over the Plan period. Two sites have been allocated within the draft Plan to provide the additional pitches required: S20 – York Way Deport and adjacent land at Freight Lane, and C27 Land adjacent to Constable House, Adelaide Road. It is anticipated that these sites could deliver a maximum of six pitches, and as such LBC is currently unable to meet their identified need over the Plan period.

Policy H14 of LP2021 states that a ten-year pitch target should be included within development plan documents. To be consistent with Policy H14 of the LP2021, LBC should clearly set out their ten-year pitch target and how they plan to meet those needs in full. The draft Plan should be updated to include this target and set out whether the two sites identified are able to fulfil the ten-year target or not. It is understood that LBC have written to other LPAs to ask whether they are able to meet the accommodation needs of Gypsies and Travellers. If LBC cannot meet their ten-year pitch requirement this would be a general conformity issue.

Tall Buildings

There are a number of viewing corridors which run through LBC that should be taken into consideration when planning for tall buildings. These are Primrose Hill summit to St Paul's Cathedral; Parliament Hill oak tree to Palace of Westminster; Parliament Hill summit to Palace of Westminster; Parliament Hill summit to St Paul's Cathedral; and Kenwood viewing gazebo to St Paul's Cathedral. Extensions of the Blackheath Point to St Paul's Cathedral and Greenwich Park Wolfe statue to Tower Bridge also fall within the borough. It is recommended that the LVMF view corridors are included within the Policies Map and local plan.

When considering tall buildings in the locations affected by the views, the guidance in the London View Management Framework and Policy HC3 of LP2021 should be taken into consideration.

Draft Policy D2 sets out LBC's approach to tall building development within the borough. The draft Plan defines tall buildings as 40m within the CAZ and 30m elsewhere. This is in line with Policy D9 of the LP2021. Table 12 of the draft Plan details a number of sites in which tall buildings may be an appropriate form of development. It is recommended that appropriate heights are included within Figure 22 or Table 12 of the Plan, to provide clarity on what heights may be acceptable in the identified locations.

Industrial land and Waste

Camden is located within the Central Services Area (CSA) that supports the Central Activity Zone. There are no SIL sites located within LBC. The draft Plan identifies an 'Industry Area' within the borough, which is equivalent to LSIS. The LSIS site is subject to a site allocation (C3 – Murphy Site), identified to deliver 750 additional self-contained homes. The site allocation states that development at this site should be 'employment-led' and seek to 'intensify industrial provision to increase, or at least maintain, industrial storage and warehousing capacity'. The site allocation needs to be clearer in terms of the amount of industrial space that is envisaged at this site.

Overall, the draft Plan identifies that there is just under 35ha of industrial land within LBC. The draft Plan does not identify the amount of industrial capacity that is required to be delivered over the Plan period. This should be provided and broken down so that is clear what the need is for Class B uses. It is noted that draft Policy IE3 sets out a 'manage and protect' approach to the supply of industrial and warehousing land within the borough, but this should be strengthened to ensure that sufficient supply is planned for to meet demand.

Within LBC's industrial land there is one waste management site, and one aggregates site. The waste management site is identified within the North Waste London Plan, with the aggregates site safeguarded through draft Policy S1(Q). The Regis Road site allocation includes LBC's waste management site. The site allocation is clear that the development must retain or re-provide the Regis Road Recycling Centre, unless suitable compensatory sites are provided elsewhere that replace the existing provision. It should be noted that if the waste site is identified as surplus capacity, it should in the first instance be offered to other LPAs within London who are unable to meet their apportionment requirements.

It should be ensured that LSIS, waste sites and aggregate sites are clearly identified on the Policies Map.

GREATER LONDON AUTHORITY

Office Development

The draft Plan sets out an estimate that circa 400,000sqm of floorspace will be provided for office and research development uses over the Plan period. Draft Policy IE2 seeks to manage and protect the stock of offices within the borough. The draft Plan contains site allocations seeking to provide office floorspace. Office floorspace should be directed towards the CAZ, town centres and Opportunity Areas.

Town Centres/CAZ

The south of Camden forms part of the Central Activities Zone (CAZ), as defined in Policy SD4 of the LP2021. Part N of Policy SD4 sets out that Development Plans should look to define the boundary in detail and include on policy maps. Policy SD5 states that new residential development should not compromise the strategic functions of the CAZ.

Transport

The draft Plan sets out a number of policies that support shifting journeys to sustainable modes, adopt the Healthy Streets Approach and exceeding London Plan requirements for car parking and cycle parking, which is supported. We particularly commend LBC for retaining the requirement for car-free development across the borough.

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 allow more than the current 24 trains per hour. We therefore encourage LBC to carefully consider how the policies and site allocations in the plan could make the most efficient use of land to help deliver this upgrade alongside step-free access.

LBC is encouraged to make clear in the draft Plan where and how bus infrastructure, including priority measures, will be enhanced to support the efficient operation of the bus network and improved journey times. Relevant site allocations should be more specific with infrastructure requirements to protect access to the bus network and enhance infrastructure as part of development and design principles, linked to achieving sustainable mode share targets. LBC should make the safeguarding limits, including sites of surface interest, clear within the draft Plan. This includes within site allocations which are subject to Crossrail 2 safeguarding directions. Policy should clearly set out the process for safeguarded sites and how this might impact development within the relevant site allocations.

Further comments on Transport elements can be found within TfL's detailed comments, which are provided in a separate response.

Green Spaces

There are four areas of MOL within Camden: Hampstead Heath and adjoining areas, Regent's Park, Primrose Hill/Barrow Hill Reservoir, and Highgate Cemetery/Waterlow Park/Fairseat. Draft Policy NE1 seeks to give strong protection to maintaining the openness and character of MOL. It is noted that the supporting text for this policy states that LBC will 'protect the openness and character of these spaces in accordance with London Plan Policy and Policy guidance in the National Planning Policy Framework (NPPF) on Green Belts'. For clarity, the GLA do not consider the changes to the NPPF in December 2024 to apply to MOL and will be seeking to address this through the new London Plan.

GREATER LONDON AUTHORITY

Next Steps

I hope these comments positively inform the ongoing preparation of LBC's Local Plan. GLA officers are keen to continue working with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021 as well as delivering LBC's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Amy Tempest at amy.tempest@london.gov.uk

Yours sincerely,



Lisa Fairmaner

Head of the London Plan and Strategic Planning

Cc: Anne Clarke, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning and Regeneration Committee
National Planning Casework Unit, MHCLG