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For the attention of Pauline Butcher

13.03.2026

**Examination of the Camden Local Plan Proposed Submission Draft (April 2025)
Hearing Statement submitted on behalf of Shaftesbury Capital PLC
Main Matters 5, 9 and 10**

This Hearing Statement has been prepared by Rolfe Judd Planning on behalf of Shaftesbury Capital ("SHC") in advance of the hearing sessions for the Examination in Public of the Camden Local Plan Proposed Submission Draft ("CLP") which are due to commence on 19th May 2026.

The Statement principally responds to the following matters set out within the Inspector's Matters, Issues and Questions ("MIQs") for Examination:

- **Main Matter 5:** Delivering an Inclusive Economy
- **Main Matter 9:** Climate Change and the Environment
- **Main Matter 10:** Site Allocations and Area Based Policies

We understand that the London Borough of Camden ("LBC") will be providing a response to all questions raised. Our response is intended to provide additional clarity/information to particular questions within Matters 5, 9 and 10. This statement builds on the previous representations submitted on behalf of SHC to the Regulation 18 and Regulation 19 versions of the draft CLP.

SHC is a Real Estate Investment Trust which invests in London's West End and has a significant interest in South Camden, primarily Seven Dials (Holborn and Covent Garden Ward), where majority of landholdings are in the Borough. In particular, SHC are committed to ensuring their investment portfolio makes an important contribution to the historic heart of the West End and its global reputation as a shopping, entertainment, culture and visitor destination and high-profile commercial hub. The portfolio includes a significant quantum of residential accommodation therefore SHC works closely with its own tenants and wider residents to address and mitigate the challenges of an intensively used urban environment.

The policies implemented through the Local Plan will directly influence and impact on the future development of this part of South Camden. As such, SHC are committed to participating in the upcoming hearing sessions



to ensure that planning policy remains appropriate to the area.

Statements and Attendance

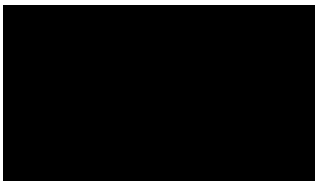
Appended to this letter are the Hearing Statements responding to the Inspector's MIQs in relation to Main Matters 5, 9 and 10.

Shaftesbury Capital welcome the opportunity to continue a constructive dialogue over the evolution of the draft Camden Local Plan and hope our comments, borne out of our practical experience, will make a valuable contribution.

We look forward to the opportunity to discuss these matters further at the forthcoming hearing sessions in May and June 2026.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours faithfully



Andrew Hicks
Estates Director





Main Matter 5: Delivering an Inclusive Economy

Issue: *Whether the Plan has been positively prepared, is justified, effective, consistent with national policy and in general conformity with the London Plan in addressing the economy and employment needs of the Borough.*

Policy IE2 - Question 8: Is the requirement in criterion C to market offices using a variety of agents for at least 12 months justified?

It is not considered that the requirement to market offices using a variety of agents for at least 12 months is justified as this introduces unnecessary tests which may otherwise prevent appropriate redevelopment. Marketing evidence is viewed as a useful tool to demonstrate the lack of demand for office use in general, however applying a blanket and rigid requirement does not allow for variation in building condition, location, market demand or the size of the premises/floorspace which may make the office use unviable or unsuitable. In this instance, it is not considered commercially viable to leave a property in Central London vacant for 12 months.

Similarly, the requirement to appoint “a variety” of agents (later defined in Paragraph 9.36 as at least two agents) is overly prescriptive. A single reputable commercial agent with appropriate market reach would be sufficient to demonstrate genuine marketing efforts.

On the basis of the above, SHC consider that a more flexible approach could be adopted, whereby LBC assess marketing evidence on a case-by-case basis, having regard to aspects including:

- the scale and quality of the office accommodation;
- prevailing market conditions; and
- evidence of demand for similar premises locally.

The policy wording of Part C of IE2 should be amended to require proportionate and robust marketing evidence, rather than mandating a fixed marketing period and requiring input from a variety of agents.

Policy IE2 - Question 9: Is the requirement in criterion C (part 2) of the Policy to consider discounted rents, incentives and flexible leasing arrangements justified?

It is considered that the requirement to consider discounted rents, incentives and flexible leasing arrangements is partly justified, however this should remain realistic, and should not expect landlords offer discounted rents and incentives before alternative uses can be considered.

There is a risk that this approach could undermine the commercial viability of property assets and places a disproportionate financial burden on landowners. In practice, incentives such as rent-free periods and flexible leases are already widely used in the commercial property market where appropriate. By requiring landlords to demonstrate that they have offered discounted rents, this could effectively force property owners to accept rents significantly below market levels. This is not a proportionate planning test and could have wider implications on the rental market.

The policy should therefore be reworded to require marketing to be undertaken at reasonable and realistic market rents, supported by advice from a suitably qualified commercial agent. This would ensure that office space is genuinely marketed for employment use, without adversely impacting on the commercial property market.

Policy IE2 - Question 10: Is the requirement in criterion C (part 3) of the Policy to consider reconfiguration of the premises justified?



The requirement to consider reconfiguration of a premises as part of the justification for loss of office is not considered to be fully justified. Whilst it may be appropriate in some circumstances to explore whether a building could be adapted to meet modern office requirements, including SMEs and studios, the policy as drafted effectively requires applicants to consider reconfiguration in all cases, regardless of whether it would practically be possible. For instance, many existing office buildings have physical constraints which limit the ability to be reconfigured to meet the needs of modern occupiers. This could include structural limitations, floorspace configurations and servicing and access constraints. Other factors, such as the cost of the works relative to the potential rental value, is also a key consideration.

A requirement for landowners to explore reconfiguration in all cases could also result in disproportionate costs and delays, particularly where the prospects of occupation of the office floorspace is already limited due to practical constraints. A more appropriate approach would be to require applicants to demonstrate that reasonable options for refurbishment or adaptation have been considered, where this is practicable. This would ensure that potentially viable office space is retained where possible, while recognising that certain constraints could result in not all buildings being capable of adaptation to meet modern requirements.

Policy IE2 - Question 12: Is the preference for housing in circumstances where an office use of a building is no longer feasible in Policy IE2 justified?

In principle, the preference for housing in circumstances where an office building is no longer feasible is supported and justified given the significant housing need within the borough.

SHC do, however, consider that further flexibility should be retained within the policy wording to support a range of appropriate alternative uses, rather than establishing housing as the sole preferred outcome. In certain locations, other uses such as community facilities, cultural uses, or other employment-generating uses (particularly similar alternative uses including financial or professional services or research and development) may represent more appropriate forms of development.

As such, while housing may be an appropriate priority use, the policy should ensure that other suitable uses are not unnecessarily constrained where they would deliver broader planning benefits.

Policy IE6 – Question 24: Criterion A.6 of the Policy requires there to be evidence that a centre is in decline and struggling relative to other similar centres in Camden. What evidence would this include and is the requirement justified?

Criterion A.6 requires applicants seeking the loss of Class E uses to demonstrate that a centre is “in decline and struggling relative to other centres in Camden performing a similar role and function”. In practice, this requirement would be extremely difficult to meet, particularly for sites located within the Central Activities Zone, and therefore risks making the policy ineffective. It is therefore not considered that this requirement has been justified, nor is it clear in the policy wording what evidence would be expected to demonstrate this requirement.

SHC’s landholdings are located within an identified ‘Specialist Centre’ (Covent Garden) which typically experiences constant churn in occupiers and uses. Vacancy rates are often short-term and reflective of market adjustment or change rather than structural or sustained periods of decline. As a result, it would be highly unusual for the centre to meet a threshold that could reasonably be described as being “in decline” when assessed against the wider Central London market. This would be as a result of strong indicators such as high levels of footfall, ongoing demand for a range of occupiers, high accessibility by public transport and sustained investment.

Against this backdrop, demonstrating that a centre is both in decline and performing worse than other centres in Camden would be a very high bar to evidence against. Even where individual units or frontages



are vacant, this would rarely amount to evidence that the centre itself is in decline when viewed against the performance of comparable Central London locations. The requirement is therefore considered to create a policy test that is effectively impossible to meet for this particular location, which would significantly limit the ability to support the loss of Class E uses even in circumstances where such changes may be beneficial to the vitality and viability of a centre.

In this context, the requirement to demonstrate that a centre is in decline relative to other Camden centres appears unduly restrictive and insufficiently justified. A more effective approach would be to assess proposals on the basis of whether the loss of a Class E use would harm the vitality and viability of the centre, having regard to factors such as vacancy rates, the diversity of uses, and the overall function of the centre. This approach would align more closely with the objectives of the National Planning Policy Framework, which emphasises supporting the vitality and viability of centres while allowing them to adapt to changing economic conditions.

Accordingly, criterion A.6 should be amended to remove the requirement to demonstrate that a centre is in decline relative to other Camden centres and instead focus on whether the proposed loss of Class E floorspace would support or undermine the vitality and viability of the centre in question.

Policy IE6 – Question 25: Criterion A.9 of the Policy resists proposals involving the formation of larger units in certain circumstances. Is this justified and effective?

It is not considered that the requirements set out by Criterion A.9 in relation to resisting the amalgamation of units is sufficiently justified. Whilst maintaining a diverse retail offer and supporting independent businesses supports wider town centre objectives, the policy as currently drafted is overly restrictive and inflexible to respond to changing market requirements and evolving retail formats.

In SHC's experience, retail and service operators are increasingly requiring larger floorplates in order to be viable and operate efficiently, particularly where onerous building regulations including fire safety, disabled access, and mechanical and electrical requirements, significantly reduce the area of tradeable floorspace. Restricting the formation of larger units could therefore risk limiting the ability of centres to adapt to changing market conditions and discourage investment in centres.

A more effective and appropriate policy wording could be to allow the formation of larger units where it can be demonstrated that the proposal would not undermine the overall diversity of unit sizes within the centre; would support the vitality and viability of the centre; and an appropriate proportion of smaller units would remain available. This ensures that the policy supports retention of smaller independent retail space where appropriate, while also allowing centres to adapt to changing market demands.



Main Matter 9: Climate Change and the Environment

***Issue 1:** Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan with regard to climate change.*

***Question 1:** Is the Plan's approach to climate change consistent with national policy and in general conformity with the London Plan?*

In general terms, the CLP's approach to addressing climate change aligns with the strategic direction of the London Plan 2021. In particular, the ambitions to reduce greenhouse gas emissions and support renewable and low-carbon energy infrastructure.

However, in some areas the CLP goes beyond the requirements of the London Plan, including the requirement to submit a pre-demolition audit and a whole life cycle carbon assessment for schemes which propose substantial demolition, regardless of the scale of the development. The London Plan only triggers the need for these requirements for major developments. Additionally, detailed operational energy performance targets and requirements for on-site renewable energy generation as set out in Policy CC6 would be triggered in situations where a change of use of an existing building over 500sqm occurs or where a proposal creates one or more homes, which is overly onerous, particularly for re-provided floorspace.

While boroughs may set more ambitious targets than strategic targets where justified by evidence, it is important that such requirements remain deliverable and viable, particularly when applied across a wide range of development typologies. The policy requirements need to be commensurate with the scale of the proposals and provide sufficient flexibility for minor schemes.

***Question 4:** What are the implications of Policy CC2 of the viability of development? What evidence is there to support this?*

SHC are of the view that Policy CC2 may have viability implications for development, particularly where significant additional work is required to demonstrate the feasibility of retaining existing structures.

The policy wording in Part B requires developers to submit detailed condition and feasibility assessments and development options appraisals as part of a planning application before demolition proposals can be justified. As a result, development costs would increase through the need for additional structural and technical surveys; engineering assessments; and preparation of multiple development options where required.

Retrofitting or adapting older buildings can in some cases be more expensive than redevelopment, particularly where there are structural constraints or servicing limitations. Inefficient floorplates can further limit the building's suitability for modern uses. While the Council's broader objectives to achieve net-zero supports the reduction of carbon emissions, it is not clear from the supporting policy text how viability implications have been accounted for.

It is considered that policy could be more appropriately worded to allow for viability considerations to be taken into account where retention or retrofit of an existing building would impose unreasonable costs or compromise the deliverability of development.



Main Matter 10: Site Allocations and Area Based Policies

Issue 2: South Camden - *Whether the proposals for South Camden are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.*

Question 2: How does the designation of Seven Dials as a “Specialist Area” affect its ability to support evening and night-time economy activities?

SHC’s primary landholdings are within Seven Dials, in the South of the Borough. Seven Dials is designated as a “Specialist Area” in the CLP which is not considered to fully reflect the role the area currently plays in supporting the evening and night-time economy, and may limit the ability of the centre to continue evolving in this regard.

Seven Dials forms part of the wider West End economy and accommodates a diverse mix of retail, hospitality, cultural and leisure uses. The area supports a significant concentration of restaurants, bars, theatres and entertainment venues which contribute to activity throughout the evening and night-time period, alongside a strong retail offer and an established residential community.

As part of the evidence base for the CLP, the Camden Retail and Leisure Study (2024) identifies that the Seven Dials area comprises approximately 54% retail uses, 26% food and beverage uses (including bars, nightclubs and public houses), and around 20% other uses. Further, Camden’s recently adopted Evening & Night-Time Strategy 2024-2029 highlights that Camden’s evening and night-time activity is strongest in the south with 48% of licensed venues located in this area, and a high concentration around Seven Dials. This evidence demonstrates a wide mix of uses and reflects the area’s important function as both a daytime retail destination and an evening leisure destination.

In the CLP, Policy IE6 describes such areas primarily in terms of clusters of independent or niche retailing and food and drink uses. While this description captures part of the character of Seven Dials, it does not fully reflect the broader leisure and evening economy role the area performs. Additionally, Policy S1 specifically identifies CAZ retail clusters as the locations where the Council will support efforts to widen the range of evening and night-time economy uses. Equivalent support in policy terms is not explicitly provided in locations identified as Specialist Areas. As a result, the policy framework sets out a priority for evening and night-time economy growth in CAZ retail clusters while providing less policy support for areas such as Seven Dials.

Given the strong existing concentration of evening and leisure uses in Seven Dials, and its close functional relationship with the wider West End and the Central Activities Zone, this distinction risks creating an unnecessary constraint on the continued diversification of the area.

The designation may therefore reduce the flexibility needed for the area to respond to changing market conditions and evolving visitor expectations, particularly in relation to hospitality, leisure and cultural uses which form an important part of the West End economy.

A more appropriate approach would be to ensure that the policy framework recognises the existing mixed-use and evening economy role of Seven Dials, either by identifying it as a CAZ retail cluster or by ensuring that Specialist Areas with a strong evening economy function are afforded equivalent policy support for these uses.

This would better reflect the character and economic role of Seven Dials and ensure that the Local Plan supports the continued vitality and resilience of this part of the borough.