

London Borough Camden Statement on Matter 6: Supporting Camden's Communities

Please note that where document references are included below, these relate to documents in the Council's examination library which is available to view on the [Council's website](#).

Issue:

Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to community infrastructure?

Questions

Policy SC1

With reference to Policy SC1:

- 1. Is the Policy consistent with national policy and in general conformity with the London Plan?**
 - 1.1 The Council considers that Draft Local Plan Policy SC1 Improving Health and Well-being is consistent with national policy and is in general conformity with the London Plan 2021.
 - 1.2 Supporting communities' health and wellbeing is an integral part of the social objective which contributes towards achieving sustainable development, as set out in National Planning Policy Framework paragraph 8b). Draft Policy SC1 B1 sets out the expectation that development should be designed to support good health and well-being, minimise adverse impacts on health and well-being, and reduce health inequalities; provide a healthy living and working environment, and support healthy and active lifestyles. This is consistent with NPPF paragraph 96a) in Chapter 8 Promoting healthy and safe communities, which states that planning policies and decisions should aim to achieve healthy, inclusive and safe places. Policy SC1 B4 expects development to be safe and accessible for all, consistent with NPPF paragraph 96b).
 - 1.3 Draft Policy SC1 is consistent with a number of London Plan policies, including Policy GG3 Creating a healthy city, which aims to improve Londoners' health and reduce health inequalities and promotes the use of Health Impact Assessments, Policy D5 Inclusive design, and Policy T2 Healthy streets. The Mayor / GLA did not raise any concerns with the approach to this matter in the draft Local Plan.
- 2. What evidence supports the threshold and scope for Health Impact Assessments, in part C of the Policy?**

- 2.1 The approach in the draft Plan is considered to be appropriate, justified and sound. Health Impact Assessments (HIA) help to ensure that health and well-being is properly considered as part of the planning process. An HIA should identify the likely health impacts of a development and include measures to improve health outcomes and address negative effects and inequalities. The approach to HIAs in the draft Local Plan is supported by the Health Impact Assessment of the draft Camden Local Plan carried out by Camden Council's Health and Wellbeing Department and NHS London Healthy Urban Development Unit (SD09), and is consistent with London Plan Policy GG3 Creating a healthy city (Part D), and national planning policy guidance (NPPG) on Health and safe communities. The Council has been requiring Health Impact Assessments from relevant developments for a number of years in accordance with policy in the adopted Local Plan.
- 2.2 The NPPG states that a health impact assessment is a useful tool to use where there are expected to be significant impacts. The approach in the Local Plan is consistent with this, with HIAs expected for major applications, which are likely to have the most significant impacts due to their size, and other applications where they have the potential to give rise to significant adverse health impacts. The scope of a HIA will vary depending on the size of the development and its location, as set out in draft Local Plan paragraph 10.11.

Policy SC2

With reference to Policy SC2:

- 3. Is Policy SC2 consistent with national policy and in general conformity with the London Plan?**
- 3.1 Policy SC2 Access for All is consistent with national policy and is in general conformity with the London Plan 2021. Policy SC2 seeks to ensure that developments are designed to promote access and inclusion, that community infrastructure is located where it is easily accessible, and that streets and spaces are fully accessible. The NPPF states that planning policies should aim to achieve healthy, inclusive and safe places which are safe and accessible (paragraph 96b) and ensure that developments create places that are safe, inclusive and accessible (para 135 f). Policy SC2 also encourages the provision of public transport in Camden that is easily accessible to everyone in accordance, consistent with NPPF paragraph 177.
- 3.2 Draft Policy SC2 is consistent with the London Plan 2021, in particular Policy D4 Inclusive design, which promotes development meeting the highest standards of accessible and inclusive design; Policy D8 Public realm, which states that development plans should ensure the public realm is well-designed, safe, accessible and inclusive; Policy S1 Developing London's social infrastructure, which expects community facilities to be easily accessible by public transport, cycling and walking, and in terms of their location; Policy D7 Accessible housing; and Policy S6 Public toilets.

Policy SC3

With reference to Policy SC3:

- 4. Is Policy SC3 consistent with national policy and in general conformity with the London Plan?**
- 4.1 Draft Local Plan Policy SC3 Social and Community Infrastructure is consistent with national policy and in general conformity with the London Plan.
- 4.2 Paragraph 10.40 explains which types of “social and community infrastructure” the policy is intended to be applied to. The draft Local Plan has dedicated policies dealing with a number of uses which can be considered social infrastructure and are referenced in paragraph 98 of the National Planning Policy Framework (NPPF). Policy IE6 (11) addresses local shops, Policy SC4 open spaces and playing fields Policy SC4, Policy SC6 cultural facilities and Policy SC7 public houses.
- 4.3 Policy SC3 Part C criteria 1, 2, 5, 6 and 8 are particularly relevant in ensuring that new or expanded provision will be effective and will support the NPPF’s objective at paragraph 98 for the development and modernisation of facilities and services. Part D sets out how social and community infrastructure is to be protected which the Council considers is in line with paragraph 98 (c) of the NPPF.
- 4.4 The Council has taken a positive planned approach to identifying infrastructure needs through engaging with colleagues and partners delivering services in the borough. This engagement extended to the preparation of an Infrastructure Delivery Plan (EB43), which considers the need for a wide range of infrastructure types and draws on the findings of existing strategies, where available. The Council has extensive experience of delivering social infrastructure as a component of major mixed-use developments, including estate regeneration schemes and in its role in managing or leasing community and mixed-use buildings.
- 4.5 Paragraph 100 of the NPPF refers to provision for early years, school and post-16 education. These matters are examined further in the Council’s Infrastructure Delivery Plan (EB43). This draws on ‘sufficiency assessments’ such as the Council’s statutory duty to undertake school place planning.
- 4.6 In recent years, persistently low birth rates have resulted in surplus capacity across the school estate, resulting in the closure and merger of schools. Over the next ten years, it is highly likely that additional school places can be provided within existing schools. This takes into account the Council’s housing trajectory (including draft Local Plan site allocations) and forecast child yield. Policy S14 of the draft Local Plan carries forward an allocation for Land at Pakenham Street and Wren Street where an education use would be supported subject to evidence of need.
- 4.7 An objection made by the Department for Education to the draft Local Plan requests that the Council allocates a site to accommodate Abacus Primary School. We have referenced this requirement in the Infrastructure Delivery Plan, however there is no obligation for Local Plans to allocate land for specific schools and, as noted above,

there is a surplus of school places in the borough. This school serves a catchment including Belsize and Hampstead which is already well served by primary schools and is an area where a relatively limited supply of large development sites come forward.

- 4.8 Draft Policy SC3 is consistent with and will support policies in Chapter 5 of the adopted London Plan. The Council's Infrastructure Delivery Plan (EB43) and draft Policy SC3 accord with London Plan Policy S1 Developing London's social infrastructure part (A), Policy S2 on Health and social care facilities and Policy S3 on Education and childcare facilities. Where the loss of social infrastructure is proposed, we will take into account wider public sector transformation plans and seek alternative community uses, as per London Plan Policy S1 Developing London's social infrastructure parts (F) and (G).
- 4.9 Draft Local Plan Policy SC3 also includes reference to the provision of public toilet facilities, baby change facilities and access to free drinking water which supports London Plan Policies S6 Public toilets and D8 Public realm.
- 4.10 It should also be noted that the GLA's response to the draft Local Plan did not raise any concerns with the policy. This is evidenced by Appendix R of the Council's letter to the Inspector dated the 12 December 2025 (ED03r) and the Statement of Common Ground that the Council has signed with the GLA (SD19).

5. Does the Policy provide clarity to applicants on when and how contributions will be sought?

- 5.1 The Council considers that draft Policy SC3 provides sufficient clarity to applicants on when and how contributions will be sought.
- 5.2 Part B of draft Policy SC3 states that "The Council will seek planning obligations to secure contributions towards new and improved social and community facilities and services to mitigate the impact of development", while paragraph 10.44 of the supporting text explains that "The Council will seek section 106 planning obligations, where necessary, to ensure that the additional demand a development places on existing community infrastructure and services will be met." We consider this will generally apply to large major schemes and is subject to viability, as paragraph 10.44 confirms: "When using Section 106 agreements, the Council will take into account viability as a factor in determining the types of facilities or services that are required and the timeframe in which these can be delivered".
- 5.3 To provide further clarity regarding the circumstances in which contributions will be sought, the Council are proposing a main modification to SC3 Part B: 'The Council will seek planning obligations to secure contributions towards new and improved social and community facilities and services necessary to mitigate the impact of development.' The Council will update the Schedule of proposed main modifications to the Camden Local Plan Proposed Submission Draft accordingly (see SD51 ref MM82).

5.4 Further information on how planning obligations are sought for community provision is then set out in Camden Planning Guidance (CPG) on Community uses, leisure facilities and pubs (LD23). Here paragraph 2.4 of the adopted CPG sets out the thresholds at which contributions will be sought.

6. Are the requirements of criterion D.1b of Policy SC3 which expects the provision of marketing and vacancy evidence for a 12 month period justified and effective?

6.1 The Council considers that the approach in draft Policy SC3 is justified and effective. It reflects the Council's current approach set out in adopted Policy C2 Community facilities (LD01) and in Camden Planning Guidance (CPG) on Community uses, leisure facilities and pubs (LD23), and is consistent with paragraph 98 (c) of the NPPF.

6.2 We consider that sufficient flexibility has been built into Part D and the draft policy will enable the modernisation of facilities and services and the optimisation of sites. At paragraph 10.57 we have noted: "There may also be circumstances where a community use, either wholly or in part, is no longer required in its current use. In this instance, the applicant will be expected to demonstrate to the Council's satisfaction that the loss of the facility would neither create nor add to a shortfall in provision for the existing community use and, if it would not, that the facility is unable to address a need for any other community use in the local area... The loss of a facility may also be acceptable where this forms part of an asset management strategy of a public or voluntary body and the loss is necessary to allow the service to continue operating successfully, for example where a facility is underused or no longer fit for purpose".

Policy SC4

With reference to Policy SC4:

7. How does the Policy reflect the expectations of Policy G4 of the London Plan?

7.1 Part A (1) of Policy G4 states that boroughs should "undertake a needs assessment of all open space to inform policy". The Council undertook an open space needs assessment in 2014 (EB29 and EB30) to inform the current Local Plan 2017. The Study's findings and recommendations remain fit-for-purpose and broadly reflect the existing situation in Camden, i.e. there has not been a significant change in population nor the total supply of sites since the 2014 Study was published. Therefore, the Council did not consider it necessary or proportionate to undertake a new open space study to inform the preparation of the draft Local Plan. See paragraphs 5.13 – 5.16 of the Council's Open Space and Sport Topic Paper (TP06).

7.2 297 open space designations are shown on the draft Policies Map (SD10), including 12 new open spaces identified through this Local Plan review. This supports Part A (2) of Policy G4 which states development plans should "include appropriate designations and policies for the protection of open space to meet needs and address deficiencies" as well as Part A (3) that says plans should "promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the

potential for substantial change”. Policy SC4 prioritises the delivery of ‘public open space’ as defined in paragraph 10.65 of the Plan. Where such open space is provided, the Council will require a management plan to show how a scheme meets the requirements of the Mayor of London’s Public London Charter. We therefore consider our approach also aligns with Part A (4) of Policy G4. Furthermore, we will continue to protect existing spaces and seek provision of new open space, including where there are deficiencies, in line with Part B of Policy G4.

7.3 The draft Local Plan’s site allocations identify the sites that are most likely to facilitate the provision of additional public open space. Further detailed design work at the planning application stage will then determine exactly how much open space can be provided alongside other land uses. This is in line with Policy G4 Part A (3) of the London Plan which states development plans should “promote the creation of new areas of publicly accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change”.

7.4 Furthermore, the draft area policies identify where possible green infrastructure interventions can improve access to green space, particularly in areas of open space deficiency. Many of these emerging projects involve enhancements to walking and cycling routes and areas of public realm and while important in themselves, are distinct from parks and open spaces, which typically form the basis for identifying standards in an open space needs assessment. The Council’s Green Infrastructure Strategy will provide further detail regarding these opportunities, and a draft is due to be published later this year.

7.5 It should also be noted that the GLA’s response to the draft Local Plan did not raise any concerns with the approach on open space. This is evidenced by Appendix R of the Council’s letter to the Inspector dated the 12 December 2025 (ED03r) and the Statement of Common Ground that the Council has signed with the GLA (SD19).

8. How has the Council reviewed its evidence on open space provision and standards to establish whether it remains valid and how does this underpin the justification for the Plan’s approach?

8.1 This is considered in paragraphs 5.14 - 5.16 and 6.5 - 6.7 of the Open Space and Sport Topic Paper (TP06). The Council’s development data shows that it is only possible to deliver on-site open space in exceptional cases, invariably in large-scale major developments (see Appendix 1 of Topic Paper TP06). Camden’s highly built-up nature and high land values mean that it is not practical or viable for the loss of open space to be mitigated through the provision of equivalent or better open space on land either near to the development site or elsewhere in the borough.

8.2 The open space standards have been in place for a number of years (since the 2006 UDP for the 9sqm residential standard and the 2010 LDF for 0.74sqm commercial standard) and the Council has not experienced any significant practical difficulties in their implementation. The standards were found sound at the public examination into the Council’s current Local Plan and at examinations into previous iterations of the plan. Given the limited change in the total quantum of open space and in the

population in Camden, we consider that it is appropriate to retain the 9sqm standard for residential development.

- 8.3 As set out in the Inclusive Economy chapter of the draft Local Plan, utilisation of offices has been impacted by changing working patterns post Covid, and amenity spaces, such as roof terraces and balconies are now an increasingly common element of office refurbishment projects. Therefore, although there has been significant growth in the stock of offices since the Local Plan 2017 was adopted, we do not consider it necessary or appropriate to alter the commercial standard of 0.74sqm at the current time. The Council also considers that the standard for student accommodation in Table 11 of the draft Local Plan continues to be reasonable and appropriate - with several large higher education institutions in Central London, students are a significant user of parks and open space.
- 8.4 Where on-site provision is not possible, the draft Plan states that the Council will seek a financial payment-in-lieu (PIL) to fund improvements to existing open spaces in proximity to the development (continuing the approach in the current Local Plan). This is based on the formula set out in Figure 3 of the Camden Planning Guidance on Open Space (LD32). The formula has been used for calculating PIL across several iterations of the Local Plan (with minor amendments) and generates significant funding to offset the impacts of increased use of existing public open space. Payments are commensurate with the size and type of scheme and subject to viability (in line with the approach set out in paragraph 15.30 of the draft Local Plan). The level of payment takes into account the Council's costs in managing and maintaining open spaces in the borough, including play areas. Smaller schemes below the threshold in Table 11 are not required to make an open space contribution.
- 8.5 The Council also uses funding collected through the Community Infrastructure Levy to support major open space projects in some instances, e.g. in parts of the borough where limited development comes forward. Here, the local proportion of CIL helps to support many small scale open space and greening projects promoted or led by community groups.
- 8.6 The Local Plan Viability Study (EB01) demonstrates that the Local Plan's approach to open space remains viable. The open space standard was included as part of the cost of site-specific mitigation in the Study (through Section 106 Agreements). It found that an open space contribution is unlikely to be a barrier to development for most typologies. The Council, therefore, consider the standards and thresholds to be justified and deliverable.

9. What evidence supports the use of a standards based approach for new open space and sports provision?

- 9.1 The current open space standards of 9sqm standard per occupant for residential schemes and 0.74sqm standard for non-residential uses are based on the Council's own evidence of the supply of open space in the borough (including many sites that the Council owns and manages itself) and findings set out in previous Open Space studies prepared in 2003 and 2008. The standards and approach to seeking

contributions have been found sound across multiple Camden local plan examinations.

- 9.2 The August 2008 'Open Space, Sport and Recreation Study Update' noted that: "Meeting the standard of provision in new developments will be challenging and in many areas is unlikely to be achievable, particularly as most identified future housing sites are below 1 hectare in size. It is important to provide usable public open space of sufficient size and therefore the priority in most parts of the Borough will be to improve the quality of existing public open space, and improve the accessibility to open space. The quantity standard provides a useful measure for assessing existing provision in the catchment of development proposals, and provides a mechanism for calculating contributions for improving the quality of existing provision where on site provision is not feasible" (paragraphs 5.11-5.12).
- 9.3 On applying a standard for commercial schemes, the Study considered: "Most jobs in Camden are located south of Euston Road in the Central sub area, and most new commercial development is likely to be located in this area. The current working population in the central sub area is 153,4409, and the existing public open space provision in the sub area is 11.4 ha, the amount of provision per worker therefore equates to 0.74 sqm per worker" (paragraph 5.15).
- 9.4 The standard of 9sqm is based on the overall amount of publicly accessible open space available per resident in Camden. Several types of open space were included: parks, amenity spaces, natural greenspace, play areas and allotments. The total 'supply' figure was adjusted based on certain assumptions: (i) only publicly accessible space be included; (ii) it should address access to locally accessible amenity space, therefore, for very large metropolitan open spaces (such as Hampstead Heath) only a 'buffer' be included in proximity to residential areas, rather than the whole of the open space, as would have a disproportionate impact on the borough's overall supply, and (iii) larger amenity areas in housing estates be included as they have a role in addressing open space deficiencies.
- 9.5 The Camden Open Space Study 2014 (EB29 and EB30) reviewed the supply of sites and open space standards. The consultants recommended a significant increase in the 9sqm standard the Council be applied to residential development to resolve existing 'deficiencies' in access to open space. These higher standards were based purely on the need for open space and did not consider whether this would be viable or deliverable or its effect on other Local Plan priorities, such as the delivery of new homes and job opportunities. If the Council had taken up the recommendations, it would not only be responding to the additional demand generated by each scheme but would be expecting developments to address the Borough's general shortfalls in open space provision. We considered that such an approach would conflict with the National Planning Policy Framework's advice on the circumstances in which developer contributions may be secured as this would address needs not 'directly related to the development' (paragraph 58 of current NPPF).
- 9.6 The Open Space standard of 0.74 per worker was originally introduced as part of the Council's Local Development Framework Core Strategy & Development Management Policies adopted in 2010. The Camden Open Space Study 2008 considered that: "It would be unreasonable to expect a commercial development to

provide open space at the same rate as residential developments, as workers may only use open space for a short period during their lunch break or after work.” The standard took into account the availability of open space in Central London (where the majority of commercial premises are located) and divided this by the total number of workers. As set out in our response to Question 8 above, we do not consider there is merit in increasing the standard when there is diverging practices between firms/sectors in terms of how they utilise office space, and commercial property market trends suggest utilisation/density per worker is falling (‘the flight to quality’). Higher standards are likely to result in even fewer schemes delivering open space on-site and therefore less open space being delivered.

- 9.7 The Council considers the existing approach is deliverable, based on experience of using the standards over a number of years and iterations of the Local Plan. Applying this approach consistently over time ensures that that existing levels of open space per person are maintained. In addition, the local element of the Community Infrastructure Levy provides additional funding to address the cumulative impact of schemes where no open space contribution is required and can also be used to fund projects tackling open space deficiency.
- 9.8 Since the Council introduced its local open space standards, the Mayor of London added a requirement in Policy S4 of the London Plan 2021 (RD01) that at least 10sqm play space standard per child for residential schemes should be delivered. As it has been long-standing practice in Camden to secure play space enhancements as part of the overall open space contribution, the Council has set out in the Camden Planning Guidance on Open Space (LD32) how the London Plan and Local Plan requirements for play and open space should be considered (paragraph 1.35). Since London Plan Policy S4 forms part of Camden’s development plan, the Council’s starting point will be the 10sqm standard; however, where there is evidence that this is difficult to achieve, we consider that the wording in the CPG provides useful flexibility. Here it should be noted that the GLA have not raised any objections to our approach to play provision.
- 9.9 Many of the borough’s larger open spaces are multi-functional and include provision for sports including Multi-Use Games Areas and tennis courts. Draft Policy SC4 and the associated open space standards therefore apply to outdoor sports facilities and provide a framework for protecting and enhancing these facilities. As noted above, it is extremely challenging to create new areas of open space, and consequently new outdoor sports facilities, in Camden. In a borough with very limited land availability, increasing access to sports and physical activity depends, to a considerable extent, upon optimising the use of existing facilities, including ‘shared use’ agreements with landowners such as schools, which the draft Local Plan supports (at paragraph 10.51). This potentially includes the repurposing of existing amenity areas within housing estates, for example where there are LB Camden Community Investment Programme (CIP) projects.
- 9.10 Chapter 12 of the Council’s Infrastructure Delivery Plan (EB43) addresses Sport and Physical Activity identifying where additional provision is planned, (unmet) future needs and potential funding sources. It highlights the priority being given by the Council and partners to increasing participation in sport and physical activity for those least engaged. This involves leveraging existing community assets and

infrastructure in combination with well-trained staff to deliver 'doorstep' services. In the Council's view, a significant limitation of quantitative standards is that they cannot readily capture the diverse range of sport and activity offered in Camden across different settings. As the IDP finds, while new physical infrastructure is required in some instances, this is far from being a complete picture of what is needed. Furthermore, which sports are prioritised and how physical activities are delivered are matters which are largely outside of the Local Plan process (and in some cases no planning application will be required), and will be 'shaped' in line with consultation with existing users of facilities and local residents.

9.11 Where appropriate, site allocation policies in the draft Local Plan identify on which sites new open space is expected, the largest of these sites are likely to have the most realistic opportunities for delivering new provision such as C2- Regis Road and Holmes Road depot, C3- Murphy Site and sites S5 and S6 in Camley Street. The Council has also adopted planning frameworks/briefs, as supplementary planning guidance, for the most significant areas of development identified in the Local Plan. The frameworks provide further detail on how open space might be delivered in these areas, which could include sports facilities. Detailed design and development work will be required to understand to what extent these spaces can support different forms of formal/informal outdoor leisure provision. Further opportunities to support active, healthy lives will be identified through the Council's forthcoming Green Infrastructure Strategy.

9.12 Indoor sports provision is predominantly delivered through the Council's leisure centres which have their own funding arrangements. Since the current Local Plan was adopted 2017, one new leisure centre has opened - within the King's Cross Central development, part of a London Plan Opportunity Area and Local Plan growth area. No other schemes are expected to come forward at this scale during the first ten years of the plan period, with the exception of development in the Euston area, which is subject to the separate Euston Area Plan. Given this, there is not considered to be the opportunity to provide major new indoor sports facilities on any of the sites allocated in the Local Plan. The larger sites, primarily in Kentish Town and Camley Street, are areas which are already well-served by existing leisure centres. We, therefore, do not consider that a standard for indoor sports provision is necessary or justified.

10. Why was a standards based approach chosen over alternatives such as the Sport England's Sports Facility Calculator or Playing Pitch Calculator?

10.1 The Council does not consider using the Sports Facility Calculator or Playing Pitch Calculator is appropriate or justified based on Camden's circumstances, nor does it reflect how sport and physical activity services are delivered in Camden.

10.2 Draft Policy SC3 builds on a well-established and effective approach for supporting investment in the borough's outdoor sports facilities; that is, the use of the standards generates funding for outdoor sports facilities commensurate with the size of scheme and likely impacts arising from additional residents and workers (e.g. renewal of Multi Use Games Areas). As there is very limited scope for providing new playing fields in Camden, we do not consider it would be reasonable or effective to introduce the Playing Pitch Calculator as a local requirement. The largest open spaces in the

borough, such as Hampstead Heath, are not managed by the Council and subject to their own management plans and governance arrangements.

- 10.3 As identified in the IDP (EB43), there are already separate funding mechanisms beyond planning to support indoor sports facilities, e.g. memberships and charges. These pay for the maintenance of existing facilities and improvement schemes as and when it is required. What sports are available and where these are located is not something that developers are able to directly influence. The Council is aware that some facilities in Camden are under pressure, particularly due to the high student and working population, and that they can be expensive to use. Development in Camden is limited in its ability to materially alter this situation.
- 10.4 Only in the Euston area, which is subject to the separate Euston Area Plan (EAP), is there considered to be the opportunity to provide major new sports facilities. The Council has undertaken a sports needs assessment for the Euston Area Plan 2022 (EB32) that provides a recent assessment of capacity across different types of sports facilities and is borough-wide in scope. Policies in the EAP set out what is expected in terms of open space and infrastructure within this area. Larger site allocations in the draft Local Plan, primarily in Kentish Town and Camley Street, are locations which are already well-served by indoor sports facilities.
- 10.5 The Council recognises that there is a vibrant mix of community and voluntary sector organisations, many of which are engaged in supporting physical activity, removing barriers to participation in sport and complement what the Council and its leisure services provider can offer within the borough's leisure centres. In some cases, these organisations operate from facilities which require funding to support modernisation work and optimise their offer to residents. Over the last decade, the local element of the Community Infrastructure Levy has provided an appropriate and effective means of funding a great variety of smaller to medium projects in the borough such as the refurbishment of Multi Use Games Areas (e.g. Three Point Park), swimming and outdoor exercise equipment for the Swiss Cottage Leisure Centre and funding support for youth football league teams (Coram's Fields and Castlehaven). This occurs without the need for the calculators as set out above.

Policy SC5

With reference to Policy SC5:

- 11. Is Policy SC5 consistent with national policy and in general conformity with the London Plan?**
- 11.1 The Council considers that draft Policy SC5 Food Growing is consistent with national policy and in general conformity with the London Plan.
- 11.2 Chapter 8 of the National Planning Policy Framework (NPPF) relates to 'Promoting healthy and safe communities'. Food growing supports both social interaction and healthy lives, as per paragraph 96(c) of the NPPF which says policies should "enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived

communities – for example through the provision of... access to healthier food...”. It also enhances the sustainability of communities and residential environments and can be viewed as an integrated approach to considering the location of housing, economic uses and community facilities and services, as per NPPF paragraph 98 a) and e). It is a legitimate way in which open spaces can be used to support “communities’ health, social and cultural well-being”, in line with NPPF paragraph 8 b).

11.3 The adopted London Plan 2021 (RD01) has a dedicated Policy G8 on Food Growing. It states that boroughs should protect existing allotments and encourage provision of urban agriculture, including through meanwhile uses. Policy SC5 is entirely in line with these objectives. The London Plan policy also states that Council’s should identify potential sites for food production. A number of Local Plan site allocations identify their potential to provide new areas of public open space which could contribute to the supply of food growing areas. The quantum and siting of any community food growing areas and/or allotments will depend on the detailed design and development of schemes for these sites, giving consideration to the types of matters identified in paragraph 10.90 of the draft Local Plan.

11.4 Furthermore, the GLA did not raise any concerns with the draft Plan’s approach on food growing, as evidenced by Appendix R of the Council’s letter to the Inspector dated the 12 December 2025 (ED03r) and the Statement of Common Ground that the Council has signed with the GLA (SD19).

12. Are the requirements of Policy SC5 justified?

12.1 Domestic and community food growing has many benefits, including improving the sustainability of food production, increasing access to healthier food, providing opportunities for healthy outdoor activity and enhancing Camden’s network of green spaces. Food growing can also enable socialisation and the learning of new skills, having a positive impact on the health and well-being of residents.

12.2 In 2022, the Council published We Make Camden (LD54), the corporate vision and strategy for the borough. It includes a Food Mission: “By 2030, everyone eats well every day with nutritious, affordable, sustainable food”. Having a dedicated policy on food growing in the Local Plan is intended to be part of the Council’s plans for delivering against this Mission, taken together with other interventions outside of planning.

12.3 Draft Policy SC5 states that the Council will “seek to secure provision of space for food growing as part of major housing developments and mixed-use developments incorporating housing, and encourage commercial developments to include provision for local food growing.” Here it is important to note that this is not a fixed policy requirement that would be applied in every case. As paragraph 10.89 makes clear, any contribution towards food growing will form part of the overall open space requirement generated by a development, in accordance with Policy SC4 (Open Space). There are not, therefore, any additional cost or viability implications arising from this policy.

12.4 The Council therefore considers that Policy SC5 is justified.

Policy SC6

With reference to Policy SC6:

13. Is Policy SC6 consistent with national policy and in general conformity with the London Plan?

13.1 The Council considers that draft Policy SC6 Cultural Facilities is consistent with national policy and in general conformity with the London Plan.

13.2 Draft Policy SC6 will support paragraph 98 of the National Planning Policy Framework (NPPF), which states planning policies should plan positively for the provision of community facilities, such as cultural buildings, to enhance the sustainability of communities and residential environments, and support “the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”. The draft Policy supports the delivery of ‘The Cultural Strategy for Camden 2026-2031 (LD89) and the Council’s Evening and Night-time Strategy’ (LD59). By safeguarding and enhancing cultural facilities in the borough, the policy will help to deliver “well-designed, beautiful and safe places... and support communities’ health, social and cultural well-being”, as per paragraph 8 of the NPPF.

13.3 Policy HC5 ‘Supporting London’s culture and creative industries’ of the adopted London Plan 2021 (RD01) is the most relevant to cultural facilities. It states that the “continued growth and evolution of London’s diverse cultural facilities and creative industries” should be supported. This should be achieved by protecting existing facilities and informed by “an understanding of the cultural offer”. Parts A and B of the draft Local Plan policy will achieve this. The Council’s Cultural Strategy and Evening and Night-time Strategy will provide an up-to-date understanding of the contribution made by different types of cultural assets and indicate how they should be supported and managed. The policy states that new cultural facilities should be steered to town centres and places with good public transport connectivity. Larger facilities should be provided in the Central Activities Zone or Camden Town (where there are existing clusters of these uses).

13.4 Policy HC5 of the London Plan states that development plans should identify and promote new, or enhance existing, locally distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters. Paragraph 10.97 of the draft Local Plan recognises that cultural facilities in Camden are clustered in both the West End and Camden Town. The Council consider that our draft planning policies for South Camden (S1) and Supporting designated centres and essential services (IE6) will provide appropriate support for cultural uses, including the specialist areas of Denmark Street (‘tin pan alley’) and Museum Street, and therefore, the identification of additional cultural quarters or clusters is not considered to be necessary. The potential use of vacant properties and land for pop-ups and meanwhile uses, as promoted by London Plan policy HC5 Part A (4), is also addressed by draft Policy IE6(4) and supporting text at paragraph 9.99 of the draft Plan, which says “vacant premises in centres...can provide an opportunity to

introduce new uses and activities that benefit local communities...Examples include...artist studios and cultural activities”.

- 13.5 The Council is also developing a ‘Camden Town Vision’ which will act as a framework to guide investment to build on Camden Town’s strengths, retain its uniqueness and promote its role is vibrant, safe, welcoming and sustainable. Cultural uses and activities will be at the heart of this approach. The intention is for the Vision to be adopted during 2026.
- 13.6 London Plan HC5 Part A (5) states development plans should seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events. The Council considers that the Local Plan’s area policies will help achieve this, e.g. Policy C1 on Central Camden, which states that “Development coming forward in this area should have a positive identity, drawing on the area’s rich heritage and Camden’s distinctive cultural energy, community and creative spirit; and deliver substantial benefit to Camden’s communities, the local area and the borough as a whole...”. Site allocations coming forward in these areas will be considered in this context.
- 13.7 Part C of Policy SC6 is positively worded by supporting new provision in principle subject to scale and where it can be demonstrated that new and expanded provision will reflect Camden’s history, culture and diversity with shared use of space encouraged in line with other forms of community facility. The Council’s Cultural Strategy has not identified a need for major purpose-built cultural facilities at this time; however it has identified the need to improve access to affordable and small-scale creative workspaces. Draft Policy IE4 Affordable workspace addresses this issue.
- 13.8 Furthermore, Part E of draft Policy SC3 will help to deliver cultural and arts projects linked to the regeneration of centres and estates, which may be funded by section 106 contributions in appropriate circumstances. This will also help deliver London Plan Policy HC5 A (5).

14. Are the requirements of criterion D of the policy justified?

- 14.1 The Council considers that these requirements are justified and reasonable.
- 14.2 Part D(1) is intended to reflect the Agent of Change principle to ensure that new/expanded cultural facilities do not impact on the existing operation of uses nearby. The Council will expect the applicant to fund any mitigation measures that may be necessary to ensure that existing operators are not unacceptably impacted by proposed developments. This is consistent with paragraph 200 of the National Planning Policy Framework and Policy D13 of the adopted London Plan.
- 14.3 The information requested under Policy SC6 D(2) will assist the Council in understanding how proposals will accord with London Plan policy HC5 and local strategies, that is, the Camden Cultural Strategy and Evening and Night-time Strategy. More broadly, it will encourage applicants to ensure that their proposals respond to local cultural and community needs. Policy HC5 A (3) of the London Plan states that development plans and development proposals should “identify, protect

and enhance strategic clusters of cultural attractions” and the supporting text of paragraph 7.5.5 says: “boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors...” and “should also consider how the cultural offer serves different groups of people (such as young people, BAME groups and the LGBT+ community), and where the cultural offer is lacking for particular groups”.

- 14.4 Policy SC6 Part D(3) will ensure that best use is made of land and buildings. This accords with London Plan policy HC5 A (4). It recognises that cultural buildings can often be under-utilised during parts of the day. Where shared use of space can be secured, this might be a route for local cultural and arts groups to find accommodation that meets their needs. There is also a desire to extend the range of cultural attractions available in the evening as part of efforts to make the night-time economy safer and more inclusive.
- 14.5 It should however be noted that the Council have proposed a main modification to Policy S6 Cultural facilities Part D in response to the comments made at Regulation 19 stage by the British museum at Reg 19 (ID594) - “Where a proposal includes a new or relocated cultural facilities, or additional floorspace, the Council will expect require the applicant to provide the following, where appropriate.” This is set out in SD51 Schedule of main modifications reference MM65.
- 14.6 To provide further clarity for applicants, the Council propose to insert a new paragraph in the supporting text, following paragraph 10.103, to read:

“In order to assess the impact of a proposal for a new or relocated cultural facility or additional floorspace, the Council will expect the applicant to provide evidence in line with Part D of the Policy. The Council recognises however that the level of evidence required to make a robust assessment, will vary dependant on the nature and scale of the proposal, with a greater level of evidence required to support a proposal for a new cultural facility, compared to the delivery of additional floorspace at an existing cultural facility. Given this, the Council will encourage applicants to take a proportionate approach when providing evidence in accordance with Part D of the Policy.” Subsequent paragraphs will also need to be re-numbered. This is set out in SD51 Schedule of main modifications reference

Policy SC7

With reference to Policy SC7:

- 15. Is Policy SC7 consistent with national policy and in general conformity with the London Plan?**
- 15.1 The Council considers that the draft policy is consistent with national policy and in general conformity with the London Plan. Paragraph 98 of the NPPF states that planning policies and decisions should: “plan positively for the provision and use of shared spaces, community facilities (such as...public houses...) and other local services to enhance the sustainability of communities and residential environments”.

- 15.2 Draft Policy SC7 carries forward the approach set out in Policy C4 of the adopted Camden Local Plan, previously found sound at examination. The Council considers that this has been effective in helping to safeguard pubs in the borough of community, heritage or townscape value. Under the Core Strategy and Development Management Policies that were in operation from 2011-17, 33 pubs were lost in Camden compared to only one (The Pakenham Arms, King's Cross) in the first two years following the adoption of the Local Plan, which takes a more stringent, evidence-based approach to the loss of public houses.
- 15.3 For many years there has been pressure to convert pubs in Camden into higher value uses, such as housing, threatening the loss of facilities which continue to be viable and meet the local community's needs. Policy SC7 carries forward an evidence-based, proportionate approach to proposals involving the loss of pub floorspace and is considered to be in line with NPPF 98(d) which states development plans should "guard against the unnecessary loss of valued facilities and services". There are also a large number of pubs in Camden that have been designated as 'Assets of Community Value' reflecting their importance to the community and the importance of pubs is also something that is recognised in adopted neighbourhood plans, e.g. Kentish Town Neighbourhood Plan 2016 (LD10) and Hampstead Neighbourhood Plan 2025-2040 (LD15).
- 15.4 Policy HC7 of the adopted London Plan addresses public houses and the Council consider the draft Local Plan accords with Parts A and B of that policy. Draft Policy SC7 B 2 states that "proposals for the change of use, redevelopment and/or demolition of a public house" will not be supported unless "there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term". Part F of the draft policy states that new public houses will be supported in the Central Activities Zone and in town centres, subject to other Local Plan policies being met. Camden Planning Guidance on Community uses, leisure facilities and pubs (LD23) provides information about marketing exercises, which aligns with London Plan Policy HC7 B.
- 15.5 Furthermore, a particular concern about development involving pubs is the loss of parts of the premises / use that help to underpin operational viability. Examples include beer gardens, function rooms and kitchens. Part D of the draft policy and the supporting text 10.120 and 10.121 addresses this issue, and align with London Plan Policy HC7 C.