

London Borough Camden Statement on Matter 7: Design and Amenity, Tall Buildings and the Historic Environment

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 in relation to design, tall buildings and the historic environment is justified, effective and consistent with national policy and in general conformity with the London Plan.

Questions:

Policy DS1

With reference to Policy DS1:

- 1. Is it consistent with national policy and in general conformity with the London Plan?**
 - 1.1 It is considered that Policy DS1 Delivering healthy and sustainable development is consistent with national policy and in general conformity with the London Plan.
 - 1.2 Policy DS1 seeks to ensure that all development in the borough contributes to 'Good Growth' in order to maximise community benefit, respond to the climate and ecological emergency, create stronger communities and deliver healthy places, both for existing communities and future generations. It ensures development makes a positive contribution to the borough to deliver the vision and objectives of the Local Plan and the ambitions, missions and challenges of We Make Camden, the Council's Corporate Strategy (LD54).
 - 1.3 The policy is consistent with the National Planning Policy Framework (ND01), which states that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). This has three overarching objectives - economic, social and environmental - set out in paragraph 8. Policy DS1 contributes to achieving these objectives by ensuring that developments optimise the use of land, meet the needs for new homes and jobs, is of the highest design quality, provide necessary infrastructure, improve biodiversity, and mitigate and be resilient to climate change.
 - 1.4 As set out in paragraph 1.0.1 of the London Plan 2021 (RD01): "Good Growth - growth that is socially and economically inclusive and environmentally sustainable –

underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved.” Policy DS1 is consistent with this and the GLA have not raised any concerns with the policy. This is confirmed in the Statement of Common Ground between the Council and the GLA (SD19) and Appendix R of the Council’s letter to the Inspector dated the 12 December 2025 (ED03r).

2. Will the requirement to prepare a joint masterplans and/or design codes for sites in multiple ownership be effective in bringing sites forward for development?

2.1 Part A of Policy DS1 Delivering healthy and sustainable development states that:

“The Council will expect development to support the creation of healthy and sustainable places in Camden by:

11. ensuring that a comprehensive approach is taken to site design and layout, including adjacent sites, where these are suitable for re-development, and that a co-ordinated approach is taken to the delivery of development..”

2.2 The supporting text to the policy states that a comprehensive approach could be achieved through the use of masterplans and/or design codes for a site/wider area (paragraph 2.33), and that bringing forward coherent and integrated development proposals where development sites adjoin each other, or are in multiple ownership, could be achieved by the preparation of a joint masterplan (paragraph 2.34).

2.3 The Plan therefore refers to the use of masterplans and design codes as possible mechanisms for achieving the policy aim of ensuring that a comprehensive and co-ordinated approach is taken to development to optimise to optimise development potential. Their use is not a policy requirement, and they will not be expected in all circumstances.

2.4 The Council considers that the approach in Policy DS1 contains appropriate flexibility as to whether the preparation of a joint masterplan and/or design code are appropriate mechanisms for bringing particular sites forward for development. Masterplans have proved effective in achieving comprehensive, co-ordinated development on large sites in the borough, notably at King’s Cross.

2.5 The approach is consistent with the London Plan, which supports the use of masterplans for large scale developments (paragraph 3.3.20 in the supporting text to Policy D3 Optimising site capacity through the design-led approach).

3. Does the policy requirement for major development to contribute to the Citizen Scientist programme meet the tests required for S106 agreements (necessary

to make the development acceptable in planning terms, directly related to the development, fairly and reasonably related in scale and kind to the development) and is it justified?

- 3.1 Part B of Policy DS1 states that the Council will seek contributions from major developments towards the Council's Citizen Scientist community research programme, secured through Section 106 agreements, to monitor the impact of development on Camden's communities.
- 3.2 Contributions will be sought in appropriate circumstances and will be fairly and reasonably related to the development in scale and in kind. These will serve a planning purpose directly related to the development by ensuring that the impacts of major development schemes on Camden's communities are monitored and the effects on communities considered.
- 3.3 It is therefore considered that the requirement meets the tests required for Section 106 (S106) obligations and is justified.

Policy D2

With reference to Policy D2:

- 4. **Is Policy D2 positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan?**
 - 4.1 The Council considers that Policy D2 is positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan. Policy D2, and the overall approach to tall buildings in the Local Plan, were informed by robust evidence provided by the Camden Building Height Study (EB34) carried out in accordance with the London Plan and relevant London Plan Guidance.
 - 4.2 The National Planning Policy Framework (ND01) does not have any specific policies on tall buildings, but does set out a number of more general design and planning principles which are relevant to the development of tall buildings. The NPPF states that local authorities should provide clear guidance on the quality of development expected within their area and promote the efficient use of land through developing at optimal densities. New development should respect existing character, should respect and avoid harm to heritage assets, and contribute to improving their local area.
 - 4.3 The Plan's approach to tall buildings has been proactively and positively prepared, providing clarity on where tall buildings may be appropriate and providing appropriate height ranges. It steers taller development towards the most suitable locations and seeks to safeguard the important character and heritage that are unique to the Borough.

- 4.4 The approach to tall buildings was discussed with the neighbouring boroughs during the preparation of the Local Plan, as set out in the Duty to Co-operate Statement (SD17) and Statements of Common Ground (SD20 - SD25).
- 4.5 Policy D2 is in conformity with London Plan Policy D9 Tall buildings (RD01). The policy approach was discussed with, and has been agreed with, the GLA, as demonstrated by the Statement of Common Ground between Camden and the Mayor of London (SD19).

5. Is the methodology and findings of the Tall Buildings Study robust?

- 5.1 The Camden Building Height Study (EB34) was carried out in accordance with the London Plan (RD01) and the Mayor's Characterisation and Growth Strategy London Plan Guidance (LPG) document (RD50). The LPG provides information for boroughs on how to identify if and where there are locations where tall buildings may be appropriate.
- 5.2 As set out in Section 1.6 of the Building Heights Study, "The methodology used... closely aligns with the LPG Characterisation and Growth Strategy... The building height guidance is also based on a robust sensitivity assessment, assessment of area-wide visions and a scoping exercise to define areas that have the potential to be appropriate for taller buildings."
- 5.3 The Study was carried out by Urban Initiatives, who have undertaken similar studies for a number of London boroughs, including Westminster, Islington and Tower Hamlets, to support the approach to building heights / tall buildings in their local plans.
- 5.4 The methodology and findings of the Building Heights Study are therefore considered to be robust.

6. How has the findings of the Building Heights Study been applied in the Plan and has this been done consistently?

- 6.1 The findings of the Camden Building Heights Study (EB34) have been consistently applied in the Local Plan. Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan, are identified in Figure 22 - Tall Buildings, and listed in Table 12 - Locations where tall buildings may be an appropriate form of development. Guidance on building heights for specific sites is set out in relevant site allocation policies. These reflect the findings of the Building Heights Study, which identified appropriate height ranges for locations where it found tall buildings may be an appropriate form of development.

7. How does the Plan reflect the guidance contained in the London View Management Framework?

- 7.1 The Plan reflects the guidance in the London View Management Framework (LVMF) March 2012 (RD02 - RD04). The LVMF is supplementary planning guidance prepared by the Mayor / GLA to provide further guidance on the management of views designated in the London Plan through Policy HC3 Strategic and Local Views and Table 7.1 Designated Strategic Views (RD01).
- 7.2 Relevant LVMF viewing corridors are included on the draft Local Plan Policies Map (SD10). Where allocated sites lie within the viewing corridors in the LVMF, this is identified in the allocation.
- 7.3 Part C.9 of Policy D2 states that when considering an application for a tall building the Council will give particular attention to the relationship between the building and hills and views, ensuring that any proposal preserves protected strategic views. Part C confirms that proposals for tall buildings will also be considered against the London Plan's tall buildings policy, which makes specific reference to the LVMF.

8. Is it clear what heights are acceptable in different locations within the Borough?

- 8.1 The Plan's approach to building heights in different locations in the borough is considered to be clear.
- 8.2 Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified in Figure 22 - Tall Buildings, and listed in Table 12 - Locations where tall buildings may be an appropriate form of development. Guidance on building heights for specific sites is set out in relevant site allocation policies.
- 8.3 This approach reflects the findings of the Camden Building Heights Study (EB34), which identified appropriate height ranges for locations where it found tall buildings may be an appropriate form of development. The appropriateness of any particular proposal for a tall building will be assessed against Policy D2, London Plan Policies D9 and HC3, all other relevant Local Plan policies, and any relevant site allocation policy.

9. Is criterion C.5 of the policy necessary given that the Plan should be read as a whole?

- 9.1 Criterion C.5 of Policy H2 states that when assessing proposals for tall buildings the Council will consider whether the proposal maximises the supply of affordable housing in accordance with Policy H4 Affordable Housing.

- 9.2 Given the acute need for affordable housing in Camden (as evidenced by Camden’s Local Housing Needs Assessment (EB10) which indicates that around 60% of the anticipated housing supply would be required to meet the need for low-cost rented housing) and the scale of development opportunity afforded by a tall building, it is considered reasonable for the Council to give particular attention to whether the proposal maximises the supply of affordable housing in accordance with Policy H4 Affordable Housing, as part of its consideration of a tall building application.
- 9.3 Furthermore, cross references to other relevant policies are included in a number of policies in the Plan, where this is considered relevant (for example Policies H2, H4 and H6). This is a common approach in local plans and is considered reasonable and appropriate, although it is recognised that, as the plan should be read as a whole, all relevant policies should be taken into account when planning applications are assessed, notwithstanding the inclusion of cross references.

10. Is criterion C.9 of Policy D2 (which requires attention to be given to the relationship between building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views) consistent with the requirements of criterion B4 of Policy D1 (which expects development to respect local views and preserve protected strategic views)?

- 10.1 To ensure consistency between criterion C.9 of Policy D2 and criterion B4 of Policy D1 the following modification is proposed to criterion B4 of Policy D1:
“~~respect~~ consider local views and preserve protected strategic views”
- 10.2 The Council have updated the Schedule of Main Modifications to the Proposed Submission Draft Local Plan accordingly (see SD51 MM85).

Policy D3

With reference to Policy D3:

- 11. Is it consistent with national policy and in general conformity with the London Plan?**
- 11.1 The design of homes has a huge influence on the health and well-being of its occupiers. It is therefore important that new homes are designed to meet the needs of all Camden’s residents. Policy D3 sets out the Council’s approach to the design of new homes in Camden to ensure they are designed and built to create high quality, accessible homes.
- 11.2 The Council considers that Policy D3 is consistent with the National Planning Policy Framework (ND01). In particular:
- paragraph 131 which states that “the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable

development, creates better places in which to live and work and helps make development acceptable to communities”;

- paragraph 35 which states that planning policies should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and
- footnote 51 of the NPPF which states that “Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.”

11.3 Here it should also be noted that national planning policy guidance on housing for older and disabled people states that planning policies for housing can set out the proportion of new housing that will be delivered for M4(2) Category 2: Accessible and adaptable dwellings and M4(3) Category 3: Wheelchair user dwellings.

11.4 The Council also considers that Policy D3 is in general conformity with London Plan Policy D7 Accessible Housing (RD01), which applies across London. This states that:

“To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:

1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’

2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.”

12. What evidence is there to justify the requirement that new-build self contained housing are to meet Parts M4(2) or M4(3) of the Building Regulations?

12.1 Many households in Camden require accessible housing to lead dignified and independent lives. This is evidenced by the fact that at the time of the 2021 Census, 15.2% of Camden residents were disabled under the Equality Act.

12.2 To help bring forward an adequate supply of accessible housing, Local Plan Policy D3 Design of Housing requires 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2) and 10% of new-build self-contained homes to be wheelchair user dwellings in accordance with Building Regulation M4(3). These requirements are consistent with Policy D7 Accessible Housing in the London Plan 2021 (RD01).

- 12.3 The accessibility standards in Policy D3 were tested as part of the Local Plan Viability Study (EB01). For appraisals incorporating the costs associated with meeting the accessibility criteria this showed only a marginal reduction in residual land values which are unlikely to have a significant impact on scheme viability (see page 114 of EB01).
- 12.4 Given this, it is considered that the requirement for new-build self-contained housing to meet Parts M4(2) or M4(3) of the Building Regulations is justified.

Policy D5

With reference to Policy D5:

13. Is the approach in Policy D5 relating to the historic environment positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan. In particular:

- 13.1 The Council considers that the approach in Policy D5 Historic environment is positively prepared, effective, justified and consistent with national planning policy and is in general conformity with the London Plan.

a) To what extent is the approach consistent with national policy on conserving and enhancing the historic environment?

b) The approaches to proposals affecting designated heritage assets, the significance of heritage assets and harm – whether substantial or less than substantial?

- 13.2 This response seeks to address qns 13.a. and 13.b. together. Policy D5 sets out the Council's approach to conserving and, where appropriate, enhancing Camden's rich and diverse heritage assets and their settings and supports the heritage-led regeneration schemes. It ensures that the local historic environment is at the heart of place making, to maintain the unique character of the borough's heritage assets and deliver high quality new buildings and spaces which enhance their settings. The policy sets out the approach to designated heritage assets, sustainability improvements to designated heritage assets, conservation areas, listed buildings, archaeology, registered parks and gardens, and non-designated heritage assets.
- 13.3 Parts C to F of the Policy set out the Council's general approach to proposals affecting designated heritage assets, with Part D covering how the Council will consider developments that have an impact on the significance of heritage assets and / or may cause harm – whether substantial or less than substantial.
- 13.4 The Council considers that the policy approach is consistent with national and regional policy on conserving and enhancing the historic environment in Chapter 16

of the National Planning Policy Framework (ND01) and Policy HC1 Heritage conservation and growth of the London Plan 2021 (RD01).

- 13.5 Historic England were engaged and consulted throughout the preparation of the Local Plan as set out in the Local Plan Duty to Co-operate Statement (SD17). In their response to the consultation on the Proposed Submission Draft Local Plan Historic England welcomed the Plan's approach and also the amendments that had been made to individual policies, including Policy D5, as a result of their comments on earlier drafts and subsequent discussions. This is confirmed by the Statement of Common Ground between the Council and Historic England (ED03m).

c) Development affecting Conservation Areas?

- 13.6 As noted in Local Plan paragraph 12.2, Camden has over 40 conservation areas, which contribute towards local distinctiveness both within Camden and London as a whole.
- 13.7 Part A of Policy D5 states that the Council will conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. Parts C to F of Policy D5 set out the general approach to designated heritage assets, which includes conservations areas, while Parts K and L of the policy set out the specific approach to development in conservation areas.
- 13.8 The Plan's approach is consistent with Chapter 16 Conserving and enhancing the historic environment of the NPPF (ND01), London Plan Policy HC1 Heritage conservation and growth (RD01), and the Council's responsibilities under the Planning (Listed Buildings and Conservation Areas) Act which requires local authorities to pay special attention to preserving or enhancing the character or appearance of conservation areas.

d) Development affecting Listed Buildings?

- 13.9 As noted in Local Plan paragraph 12.2, Camden has over 5,600 nationally listed buildings and structures. These provide a rich and unique historic and architectural legacy.
- 13.10 Part A of Policy D5 states that the Council will conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including listed buildings. Parts C to F of Policy D5 set out the general approach to designated heritage assets, which includes listed buildings, while Part M sets out the specific approach to listed buildings. The approach is in accordance with NPPF Chapter 16 Conserving and enhancing the historic environment (ND01) and London Plan Policy HC1 Heritage conservation and growth (RD01).

13.11 As set out in Local Plan paragraph 12.96, the Council pays special regard to preserving listed buildings in accordance with Section 16 of the Planning (Listed Buildings and Conservation Areas) Act.

e) How heritage at risk is considered?

13.12 Policy D5 Part C states that proposals that bring redundant or under-used buildings and areas, including those on the Heritage at Risk Register, into appropriate and viable use consistent with their conservation, will be encouraged. As detailed in paragraph 12.77, the Council identifies buildings and structures at risk and proactively seeks to conserve, where required and return them to viable use. This approach is in accordance with paragraph 203 of the NPPF (ND01) and London Plan Policy HC1 Heritage conservation and growth (RD01).

f) How sites of archaeological importance are managed?

13.13 Camden has a rich archaeological heritage, with 17 Archaeological Priority Areas (APAs), which are identified on the Local Plan Policies Map (SD10).

13.14 Part A of Policy D5 states that the Council will conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including archaeological remains. Parts N, O and P of Policy D5 set out the Plan's approach to how sites of archaeological importance are managed. The Council seeks to ensure that development makes provision for the preservation of archaeological assets and their setting. Paragraphs 12.100 - 12.107 set out further detail on how the Council expects archaeological assets to be preserved and managed.

13.15 Policy D5 is in accordance with the approach set out in NPPF Chapter 16 Conserving and enhancing the historic environment (ND01) and Policy HC1 Heritage conservation and growth (Part D) in the London Plan (RD01).

g) Development affecting Registered Parks and Gardens?

13.16 As noted in Local Plan paragraph 12.108, Camden contains 14 Registered Parks and Gardens. These are identified on the Local Plan Policies Map (SD10) and protected through Local Plan Policy D5 and Policy SC4 Open Space.

13.17 Part A of Policy D5 states that the Council will conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including historic parks and gardens. Parts Q and R of Policy D5 state that the Council will protect Registered Parks and Gardens (and London Squares) in the borough, and that proposals which protect and enhance the character, fabric, features, setting, and views into and from the borough's Historic Parks and Gardens and London Squares will be supported.

13.18 This is consistent with London Plan Policy HC1 Heritage conservation and growth (RD01) and paragraph 213 of the NPPF (ND01).

h) Development affecting non-designated heritage assets?

13.19 Part A of Policy D5 states that the Council will conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including locally listed buildings and structures. Part S of the policy then sets out the Plan's approach to development affecting non-designated heritage assets. The Council will seek to protect these assets and will weigh the effect of a proposal on their significance against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the asset. This is in accordance with paragraph 216 of the NPPF (ND01) and London Plan Policy HC1 Heritage conservation and growth (RD01).

13.20 As noted in paragraph 12.109 of the Local Plan, the Council has a Local List which identifies historic buildings and features that are valued by the local community and that help give Camden its distinctive identity but are not already designated in another way.

14. How does the Plan conform with the heritage policies of the London Plan whilst dealing with local heritage concerns?

14.1 It is considered that Policy D5 Historic Environment is consistent with Policy HC1 Heritage conservation and growth in the London Plan (RD01).

14.2 In accordance with Policy HC1 of the London Plan, Policy D5 is based on an evidence-based understanding of the borough's historic environment and sets out a clear vision that recognises and embeds the role of heritage in place-making. Policy D5 ensures that development not only conserves but also takes opportunities to better enhance, or better reveal the significance of heritage assets and their settings. It protects remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, consistent with Policy HC1.

14.3 The Council will continue to maintain and update its heritage evidence, including a comprehensive set of Conservation Area Management Strategies and a Local list of undesignated heritage assets, and will continue to be responsive to the requirements of local heritage concerns.

14.4 The GLA have not raised any concerns about the approach to heritage in the Local Plan. This is confirmed in the Statement of Common Ground between the Council and the GLA (SD19) and Appendix R of the Council's letter to the Inspector dated the 12 December 2025 (ED03r).

14.5 Furthermore, as set out in the Council's Statement of Common Ground with Historic England (ED03m), Historic England's response on the Submission Draft Local Plan

welcomed the Plan's approach and also the amendments that have been made to Policy D5 in response to their comments and discussions with them.

15. With reference to the Borough's heritage assets:

a) What heritage assets could be affected by the proposals in the Plan and how have they been identified?

b) How have the potential impacts been assessed and has this been done in a clear and consistent manner that demonstrates an effective understanding of their significance?

c) How has the setting of the assets been taken into account?

- 15.1 This response seeks to address qns 15.a., 15.b. and 15.c. together. For each site allocated in the Local Plan, heritage matters were considered as part of the site suitability assessment work, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). The first stage of site assessments involved an appraisal of site and their context, which included consideration of listed buildings on or adjacent to the site; whether the site is in or adjacent to a conservation area; positive contributors to the conservation area; Archaeological Priority Areas, Registered Historic Parks and Gardens, and locally listed buildings (see the Appendices to the Topic Paper).
- 15.2 Following this, sites were then physically surveyed and assessed to determine their suitability. Where constraints were identified on sites, these were considered against national, regional and local policy to determine whether they could be mitigated. The Appendices of the Topic Paper provide a summary of the assessment work undertaken.
- 15.3 The Sustainability Appraisal of the Local Plan (SD03) also formed part of the assessment process on heritage. SA objective 12 is to protect and enhance the historic environment. Here it should be noted that additional criteria were added into the SA objective for Heritage in response to Historic England's comments to the Sustainability Appraisal Scoping Report (SD06).
- 15.4 Heritage assets identified through the site suitability work and the Sustainability Appraisal were considered in the drafting of the Site Allocation policies, both in terms of the impact on the asset and the impact on the setting of the asset, with criteria added to the Site Allocation policies where necessary to mitigate any impact and ensure development responds positively to its context , in accordance with Local Plan Policy D5 Historic Environment. The site allocations also set out any relevant heritage assets on or near to the site.
- 15.5 Heritage assets, and their setting was also considered as part of the design-led capacity assessment carried out to inform the indicative capacities of allocated sites.

Further information on this is set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03).

- 15.6 The specific impacts of a particular development proposal on heritage assets will however be assessed in accordance with Policy D5 Historic Environment, regardless of whether the site is allocated or not.

d) What, if any, concerns have Historic England raised and how have they been addressed?

- 15.7 Historic England have been engaged and consulted throughout the preparation of the Local Plan as set out in the Local Plan Duty to Co-operate Statement (SD17). Section 4 of the Statement provides detail of how matters raised by Historic England have been considered and influenced the Proposed Submission Draft Local Plan. As set out in the Statement, Historic England's response to consultation on the Proposed Submission Draft welcomed the amendments that had been made to individual policies as a result of their previous comments on earlier drafts and subsequent discussions.
- 15.8 The Council has prepared a Statement of Common Ground with Historic England (ED03m). Section 4 includes a table setting out the matters raised by Historic England in their representation on the Camden Local Plan Proposed Submission Draft and sets out the extent to which these are resolved or remain unresolved. Matters that remain outstanding relate to the proposed amended wording of clause 6 of Allocation S18 – 135-149 Shaftesbury Avenue, and the final sentence of the Development and Design Principles for Allocations C10 - Juniper Crescent and C11 - Network Rail land at Juniper Crescent.

16. Is Policy D5 consistent with national policy and in general conformity with the London Plan?

- 16.1 Policy D5 is consistent with national policy and in general conformity with the London Plan as set out in the response to Questions 13 and 14 above.

Policy D6

With reference to Policy D6:

17. Is it consistent with national policy and in general conformity with the London Plan?

- 17.1 The Council considers that Policy D6 is consistent with national policy and in general conformity with the London Plan.

- 17.2 The National Planning Policy Framework (NPPF) (ND01) does not set out a national policy approach to basements. It only mentions basements in the context of planning for flood risk, where they are considered to be 'highly vulnerable' in the Flood risk vulnerability classification in Annex 1. Paragraph 170 of the NPPF states that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk." This approach is reflected part F 1. of Policy D6 which states "The Council will not permit basement schemes involving self-contained flats or bedrooms, bathroom or kitchens in basements in flood risk areas; require a positive pump device to be installed in basements".
- 17.3 Policy D6 is also considered to be consistent with the objectives of Chapter 12 of the NPPF on 'Achieving well-designed places' and Chapter 15 on 'Conserving and enhancing the natural environment'.
- 17.4 The London Plan 2021 (RD01) introduced a London-wide policy on Basement development (Policy D10), which states boroughs should establish basement policies in their Development Plans where this is identified as an issue locally. Local Plan Policy D6, which largely continues the approach to basement policy pioneered by Camden and originally adopted in 2010 in response to community concerns, is consistent with Policy D10.
- 17.5 London Plan Paragraph 3.10.2 notes that the construction of basements can cause significant disturbance and disruption if not managed effectively. Paragraph 3.10.3 states that:
- "Local authorities are advised to consider the following issues, including any cumulative impacts, alongside other relevant local circumstances when developing their own policies for basement developments: local ground conditions; flood risk and drainage impacts; land and structural stability; protection of trees, landscape, and biodiversity; archaeology and heritage assets; neighbour amenity; air and light pollution; and the impacts of noise, vibration, dust and site waste. Where particular and cumulative flood risk issues exist, boroughs should consider restricting the use of basements for non-habitable uses."
- 17.6 These issues are covered in Local Plan Policy D6 and the GLA has not raised any concerns with the approach to basements in the Local Plan. This is confirmed in the Statement of Common Ground between the Council and the GLA (SD19) and Appendix R of the Council's letter to the Inspector dated the 12 December 2025 (ED03r).
- 17.7 The Council's Basements Topic Paper (TP09) sets out further information on Policy D6 and its consistency with national and London wide policy.

18. Are the requirements of Policy D6 justified?

- 18.1 Draft Policy D6 - Basements takes an appropriate approach based on proportionate evidence, and is therefore justified. It largely continues the Council's established approach to basement development, which has been found sound at successive local plan examinations.
- 18.2 Basement development can have greater impacts than other domestic development. It can change ground and water conditions, potentially leading to ground instability and flooding, and have significant construction impacts, due to the complexities of excavation.
- 18.3 Although the Council considers that Policy A5 Basements in the adopted Local Plan 2017 (LD01) is operating effectively, it is considered appropriate to make some amendments to increase the effectiveness of the policy approach in protecting the environment and neighbours and the property. Further detail and justification for this is set out in the Council's Basements Topic Paper (TP09)
- 18.4 Section 5 of the Topic Paper provides detail on the evidence used to develop and support the approach to basements in the Local Plan, in particular the Camden geological, hydrogeological and hydrological study, carried out by Arup (EB37-EB42), Camden Local Plan Evidence Report - Survey of basement development (EB36, and Embodied carbon impact of basement extensions, Etude, Currie & Brown and Jensen Hunt Design (EB19).

19. Are the requirements of Policies A1-A4 justified and effective?

Policy A1

- 19.1 The Council considers that Policy A1 Protecting Amenity is justified and effective. It seeks to protect the quality of life of existing and future occupiers and neighbours, and states that the Council will grant permission for development unless it causes unacceptable harm to amenity. The draft policy covers amenity matters that can be a particular issue in Camden given its densely built up nature, such as overlooking, privacy, noise, light, and construction impacts.
- 19.2 The draft policy seeks as far as possible to take an objective, evidence-based approach to assessing potential impacts, whilst acknowledging that impacts can have particular effects on certain groups and communities. The level of site-specific investigation and details that applicants need to submit to the Council varies according to the type and scale of development as well as the sensitivity and relationship with adjoining uses, e.g. such as heritage assets or open space.
- 19.3 The policy continues the existing approach of Policy A1 on 'Managing the impact of development' in the adopted Camden Local Plan 2017 (LD01). This is operating effectively and is used in the assessment of a significant proportion of planning applications in the borough.

- 19.4 Policy A1 helps to deliver the Local Plan's strategic objective (in Table 1 of the Plan): "To promote high quality, inclusive and sustainably designed development which protects residents' amenity, respects and conserves the unique character and history of Camden's neighbourhoods...".
- 19.5 Policy A1 is also consistent with national and London wide policy. In particular, paragraph 135(f) of the National Planning Policy Framework (ND01) which states that planning policies should create places with a high standard of amenity for existing and future users and the 'good growth' policies in the London Plan 2021 (RD01) - Policy GG1 on Building strong and inclusive communities, GG2 Making the best use of land and GG3 Creating a healthy city - Policy D3 Optimising site capacity through the design-led approach, and Policy D13 Agent of change.

Policy A2

- 19.6 The Council considers that Policy A2 Safety and Security is justified and effective.
- 19.7 The Policy aims to create safe strong and open communities by ensuring that developments include design measures to contribute to community safety and security; give consideration to designing out crime and anti-social behaviour at an early stage in the planning process; and create an inclusive environment that avoids or minimises real and perceived danger as far as possible.
- 19.8 The policy addresses matters that are particularly relevant to Camden, such as reducing opportunities for crime relating to food, drink and entertainment uses, resilience to terrorism and natural hazards and mitigating potential suicide risks, especially in relation to tall buildings. In April 2025, Camden's Department of Health and Wellbeing published a 'Mental Health Needs Assessment for Adults' (LD91) in which it identifies some of the key at risk groups in the borough. As paragraph 13.51 of the draft Local Plan notes, planning has a role in preventing suicide, by ensuring that suicide prevention measures are incorporated into the design of new buildings and infrastructure.
- 19.9 Policy A2 is also considered to be consistent with national policy. NPPF (ND01) paragraph 98 states that planning policies should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Paragraph 102 then states that planning policies should promote public safety and take into account wider security and defence requirements. In addition to this, the social objective of sustainable development set out in NPPF paragraph 8 includes supporting strong, vibrant and healthy communities, and fostering well-designed, beautiful and safe places.
- 19.10 Furthermore, the policy is considered to be in general conformity with the London Plan (RD01), in particular Policy GG1 Building strong and inclusive communities which states that "planning and development must ensure that streets and public

spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging”, Policy D11 Safety, security and resilience to emergency, Policy SD6 Town centres and high streets, and Policy D3 Optimising site capacity through the design-led approach.

Policy A3

- 19.11 The Council considers that Policy A3 Air quality is justified and effective.
- 19.12 Paragraph 199 of the National Planning Policy Framework (ND01) states that “Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas”.
- 19.13 The whole of Camden is defined as an Air Quality Management Area (AQMA) which was declared by the Council in 2002 to address nitrogen dioxide and particulate matter pollution. The GLA has identified a number of Air Quality Focus Areas in Camden, where the problems of high levels of air pollution and human exposure to air pollution are most acute. The Camden Clean Air Action Plan 2023 – 2026 (LD72) sets out the actions that we will take over the period to 2026 to improve indoor and outdoor air quality and protect public health in the borough.
- 19.14 Draft Policy A3 expects development to contribute to improving air quality in Camden to protect public health and the natural environment. It takes an evidenced-based approach to the assessment of air quality, which is a continuation of the approach in the adopted Local Plan (LD01) and is considered to be operating effectively. The types of development requiring an assessment of air quality have been identified as those in the borough most likely to give rise to short- or long-term air quality impacts or increased exposure to poor air quality. The definitions of poor air quality and particularly poor air quality in Appendix 3 of the submitted Plan have been taken from the Council’s Clean Air Strategy 2019 - 2034 / Clean Air Action Plan 2023 – 2026 document (LD72).
- 19.15 The draft Policy is also consistent with London Plan Policy S11 Improving air quality which states that development plans should seek opportunities to identify and deliver improvements to air quality, and expects development proposals to be at least Air Quality Neutral (RD01).

Policy A4

- 19.16 The Council considers that Policy A4 Noise and vibration is justified and effective.
- 19.17 As set out in the supporting text to Policy A4 Camden's high density and mixed-use nature means that exposure to noise and vibration is a particularly important issue in the borough. Noise sensitive uses such as housing, schools, hospitals, workplaces and open spaces are often located close to noise generating uses. The main sources of noise and vibration in the borough are road traffic; railways; industrial uses; plant and mechanical equipment; food, drink and entertainment uses; some cultural uses; and building sites.
- 19.18 Noise and vibration can have a significant effect on the environment and on the health and quality of life of communities and individuals. Exposure to noise can lead to sleep disturbance, poor cardiovascular health, and poor mental health.
- 19.19 Policy A4 seeks to ensure that noise and vibration is appropriately considered at the design stage of developments, that sensitive uses are not detrimentally impacted by noise and vibration, and that existing uses (such as music venues, theatres and some employment uses) are not unduly restricted through the introduction of nearby sensitive uses in accordance with the Agent of Change principle.
- 19.20 The approach in Policy A4 is a continuation of the approach in the adopted Local Plan (also Policy A4 Noise and Vibration) (LD01) and previous iterations of Camden's development plan, which has been operating effectively.
- 19.21 The Plan's approach is consistent with the National Planning Policy Framework (ND01) which states that:
- “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life” (paragraph 198).
- 19.22 National Planning Policy Guidance on Noise states that plans may include specific standards to apply to various forms of proposed development and locations in their area. Camden's noise standards are set out in Appendix 4 of the submitted Plan.

These continue the approach in the adopted Camden Local Plan 2017 (LD01), which have been operating effectively.

- 19.23 The policy is also consistent with the London Plan 2021 (RD01), in particular Policy D13 Agent of Change and Policy D14 Noise.

Monitoring

20. What indicators, baselines and targets will be used to monitor amenity outcomes and what triggers would prompt an early review or policy adjustment?

- 20.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.
- 20.2 The Council has sought to ensure that the policies in the Plan contain appropriate flexibility and are worded to enable 'on balance' judgements. This will help ensure that the Plan's policies remain relevant notwithstanding any changing future circumstances.
- 20.3 The Council will monitor amenity outcomes as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of the Plan's amenity objectives, the Council will consider whether any policy adjustments or an early review is appropriate.

21. What indicators, baselines and targets will be used to monitor tall buildings outcomes and what triggers would prompt an early review or policy adjustment?

- 21.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.
- 21.2 The Council has sought to ensure that the policies in the Plan contain appropriate flexibility and are worded to enable 'on balance' judgements. This will help ensure that the Plan's policies remain relevant notwithstanding any changing future circumstances.
- 21.3 The Council will monitor tall buildings outcomes as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of the Plan's design and placemaking objectives, the Council will consider whether any policy adjustments or an early review is appropriate.

22. What indicators, baselines and targets will be used to monitor heritage outcomes and what triggers would prompt an early review or policy adjustment?

- 22.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.
- 22.2 The Council has sought to ensure that the policies in the Plan contain appropriate flexibility and are worded to enable 'on balance' judgements. This will help ensure that the Plan's policies remain relevant notwithstanding any changing future circumstances.
- 22.3 The Council will monitor heritage outcomes as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of the Plan's heritage objectives, the Council will consider whether any policy adjustments or an early review is appropriate.

Modifications

23. Are any modifications necessary for soundness?

- 23.1 The Council has proposed a schedule of main modifications (SD51) and a schedule of minor modifications (SD50) to the Camden Local Plan Proposed Submission Draft.
- 23.2 The Council has proposed modifications to Policy D1 Achieving Design Excellence, Policy D2 Tall Buildings, Policy D6 Basements, and Policy A3 Air Quality. These are set out in SD51 Schedule of main modifications reference MM67, MM68, MM69, MM70, MM71, MM72, MM73, MM74 and MM85.