

London Borough Camden Statement on Matter 8 - Safe, Healthy and Sustainable Transport

Issue:

Whether Chapter 14 in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to transport.

Questions:

With reference to Policy T1:

- 1. Is it consistent with national policy and in general conformity with the London Plan?**
 - 1.1 Policy T1 Safe, healthy and sustainable transport is consistent with national policy and in general conformity with the London Plan. It sets out the Council's overarching strategy to the delivery of safe, active, healthy, affordable, and sustainable transport in line with the Camden Transport Strategy (LD63), Climate Action Plan (LD71), and Clean Air Action Plan (LD72) to maximise health and well-being, reduce traffic congestion, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities. Policy T1 also seeks to deliver London-wide transport initiatives including the Mayor's Healthy Streets approach (RD37) and Vision Zero Strategy (RD35).
 - 1.2 The policy aims to:
 - improve health and reduce health inequalities;
 - deliver the Mayor's Healthy Streets approach;
 - promote highways greening, including through the introduction of more street trees, pocket parks, green space, rain gardens and Sustainable Drainage Systems;
 - reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise;
 - safeguard existing transport infrastructure;
 - increase walking, wheeling, cycling and public transport use;
 - improve street safety, comfort, convenience, and amenity; and
 - support these outcomes through sensitively designed servicing facilities.
 - 1.3 This is consistent with the NPPF 2024 (ND01), in particular:
 - paragraph 96 which states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lives;

- paragraph 109 which encourages Local Plans to understand and address the potential impacts of development on transport networks; and identify and pursue opportunities to promote walking, cycling and public transport use; and
- Paragraph 110 which advises that “significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

1.4 The policy approach is also in general conformity with the London Plan 2021 (RD01), in particular:

- London Plan Policy T1 Strategic approach to transport which states that “Development Plans should support, and development proposals should facilitate the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041”.
- Policy T2 Healthy Streets which states that “Developments Plans should promote and demonstrate the application of the Mayor’s Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities”.
- Policy T3 Transport capacity, connectivity and safeguarding which states that “Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East...”.
- Plan Policy T4 Assessing and mitigating transport impacts which states that “Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified”.

1.5 This is confirmed by Appendix R (Camden Local Plan London Plan Policy Assessment) 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).

2. Should the supporting text of the Policy acknowledge infrastructure linkages to neighbouring areas

2.1 To ensure that the supporting text of the policy acknowledges infrastructure linkages to neighbouring areas we propose the following modification to paragraph 14.10 - “When determining applications for new development, the Council will consider the impacts of movements to, from and within a site, including links to existing transport networks, through transport assessments, travel plans, delivery and servicing management plans, and construction management plans, to manage and mitigate the impact of developments on ~~Camden’s~~ infrastructure, environment and communities in Camden and neighbouring areas.”

2.2 This is set out in SD50 Schedule of minor modifications reference NMM33.

With reference to Policy T2:

3. Are the requirements in criterion C.2 of the policy in relation to the requirement to provide cycle parking facilities that exceed the minimum standards outlined in the London Plan justified?

- 3.1 Policy T2 Part C.2 represents a continuation of the Council's existing policy approach in Policy T1 of the adopted Local Plan (LD01).
- 3.2 London Plan Policy T5 - Cycling sets out minimum standards for cycle parking (Part 1 (2) and Table 10.2 - Minimum Parking Standards). It states that development plans requiring more generous provision of cycle parking based on local evidence will be supported (Part C). This is to "facilitate and encourage cycling, and reduce car dependency and the health problems it creates" (paragraph 10.5.1).
- 3.3 Policy T2 expects development to exceed the minimum standards outlined in the London Plan to help deliver the Council's and Mayor's aspirations to increase cycling, promote active travel and encourage modal shift, thereby reducing reliance on cars. Fewer trips by car will reduce congestion, contribute to better air quality, and lower carbon emissions in the borough.
- 3.4 The approach helps to deliver the objectives of the Camden Transport Strategy (LD63) and associated Cycling Action Plan (LD64). A key objective of the Strategy is to improve cycling facilities for those living, visiting, and working in the borough. The Cycling Action Plan, which forms part of the Camden Transport Strategy, sets objectives and targets to increase secure cycle parking provision in the borough. The Camden Clean Air Strategy 2019-2034 and Camden Clean Air Action Plan 2023-2026 (LD72) two-part document sets out the Council's approach to improving air quality and protecting health from exposure to air pollution in Camden. The action plan describes the actions the Council will take to achieve this objective, which includes a modal shift away from private vehicles towards cycling, by improving cycling infrastructure throughout the borough.
- 3.5 The GLA / Mayor of London have not raised any issues in respect of the Plan's approach to cycle parking. This is confirmed by the Statement of Common Ground that the Council has signed with the GLA (SD19).

4. Is the Policy effective in its consideration of pedestrians?

- 4.1 Policy T2 Prioritising Walking, wheeling and cycling is considered to be effective in its consideration of pedestrians. Part B of Policy T2 sets out the measures the Council will take to promote walking and wheeling in the borough. The policy seeks to secure a range of infrastructure improvements to create safer, more accessible and inclusive streets for pedestrians and disabled pedestrians, to support the delivery of the Council's Transport Strategy (LD63) and associated Walking and

Accessibility Action Plan (LD65) which provide a framework for increasing walking and wheeling in Camden for all types of journeys.

- 4.2 The approach taken is in accordance with paragraph 109 of the NPPF (ND01) which encourages Local Plans to identify and pursue opportunities to promote walking, cycling and public transport use. It is also consistent with London Plan 2021 Policy T1 Strategic approach to transport, which states that “Development Plans should support, and development proposals should facilitate the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041” and London Plan Policy T2 Healthy Streets.

With reference to Policy T3:

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

- 5.1 Policy T3 - Public Transport sets out the Council’s approach to public transport provision in the borough. It is considered to be consistent with national policy and the London Plan.
- 5.2 As part of Chapter 9 - Promoting sustainable transport, paragraph 109 of the National Planning Policy Framework (ND01) encourages Local Plans to identify and pursue opportunities to promote walking, cycling and public transport use.
- 5.3 Furthermore, London Plan 2021 (RD01) Policy T1 Strategic approach to transport states that “Development Plans should support, and development proposals should facilitate: 1) the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041”. London Plan Policy T4 Assessing and mitigating transport impacts also states that “Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified”.
- 5.4 Camden is extremely well served by public transport, particularly in the south of the borough, which has some of the highest Public Transport Accessibility Level (PTAL) ratings in the country. Areas with relatively lower levels of public transport provision continue to exist however, particularly in the north of the borough. Furthermore, during peak commuting times, the borough’s public transport network operates at or near capacity despite recent upgrades to frequencies and stations, and only a small number of the borough’s stations provide full step-free access.
- 5.5 Investment in public transport is therefore required to support the delivery of the Council’s development strategy to sustain Camden’s economy; deliver the Council’s ambitions around reducing car ownership and use; and deliver equality in access for Camden’s residents. In line with national and regional policy, Policy T3 Public

Transport seeks to ensure that Camden's growth is supported by improvements to public transport secured by planning obligations.

5.6 The GLA commented on this policy as part of their response to the Regulation 19 consultation on the Local Plan, however they did not raise any general conformity issues. The Council and the GLA have an agreed position as set out in the Statement of Common Ground (SD19).

6. Are the requirements regarding expected contributions towards step free access, interchange improvements and bus priority measures viable and deliverable?

6.1 Policy T3 Public Transport seeks to ensure that Camden's growth is supported by improvements to public transport. These improvements will be secured through planning obligations and where appropriate also funded by the Community Infrastructure Levy (CIL).

6.2 Sites have been identified in the Plan to support the delivery of step free access, interchange improvements and bus priority measures and criteria have been included in the site allocation policies to help secure this. Where site allocations in the Plan already benefit from planning consent, then direct provision of and financial contributions towards public transport infrastructure have already been secured. For example as part of the planning permission for the re-development of the O2 site (W2) in West Hampstead, the Council has secured a contribution to the delivery of step free access at West Hampstead Underground Station; the planning permission for 120-136 Camley St (S5) includes contributions towards bus stop upgrades (although this is still subject to the section 106 being signed); and the planning permission for the development of the land to the rear of the British Library (S15) includes provisions for Crossrail 2 infrastructure to be incorporated into the scheme.

6.3 The Local Plan Viability Study (EB01) takes account of both the Community Infrastructure Levy (CIL), including the Mayoral CIL, and residual Section 106 contributions as appropriate, on the assumption that these will contribute towards the provision of infrastructure. Actual amounts of Section 106 contributions will, however, be subject to site-specific considerations and negotiations when schemes are brought forward through the development management process.

6.4 The Viability Study (EB01) notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies in the Plan have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the flexible application of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

- 6.5 The Council considers that this policy contains appropriate flexibility and is worded to enable scheme viability to be considered on a case-by-case basis where appropriate. The Council therefore considers that the requirements regarding expected contributions towards step free access, interchange improvements and bus priority measures are viable and deliverable.
- 6.6 It should also be noted that TfL in their response to the consultation on the Proposed Submission Draft Local Plan stated that “We welcome support for public transport and active travel improvements and requirements for developments to contribute to transport infrastructure where appropriate”. This is evidenced in the Statement of Common Ground between the Council and TfL (ED03I).

With reference to Policy T4:

7. Are the requirements of Policy T4 justified and effective?

- 7.1 Policy T4 - Shared transport infrastructure and services sets out where the Council will seek contributions from developments that increase travel demand, towards the delivery of shared transport measures.
- 7.2 The Council is working to promote the use of shared transport infrastructure and services in Camden to reduce private motor vehicle use and provide alternative modes of transport to the public transport network. Shared transport is where travellers share a vehicle either simultaneously as a group or over time as a personal rental. This includes the cycle hire docking station network, the e-bike and e-scooter hire bay network, the electric vehicle charging point network, and the car club bay network. Shared transport is a demand driven, flexible way of accessing transportation services on an as-needed basis, and acts as a hybrid between private vehicle use, and use of public transport.
- 7.3 The Council is committed to working with TfL to expand the existing network of Santander bikes. Improvements to the network will help enable more journeys by residents and visitors to the borough, contributing to the Council’s Cycling Action Plan (LD64) and cycle mode share targets.
- 7.4 E-bike and e-scooter hire are popular with Camden residents and visitors, including people who work or study in the borough. The Council is committed to expanding the network over the Plan period to make it easier and more convenient for citizens to hire e-bikes and e-scooters delivering a network of micro mobility hubs in the borough. Expansion of these networks will provide high quality alternative modes of transport to private motor vehicle use.
- 7.5 The approach is consistent with national and London wide policy. The NPPF (ND01) states that “Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport

solutions that deliver well-designed, sustainable and popular places”. It goes on to state that this should involve “realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage” and “identifying and pursuing opportunities to promote walking, cycling and public transport use” (paragraph 109).

- 7.6 Furthermore, Policy T1 Strategic approach to transport of the London Plan 2021 (RD01) states that “Development Plans should support, and development proposals should facilitate: the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041”.
- 7.7 It is therefore considered that the policy requirements are justified and effective, and in line with national policy and the London Plan.

With reference to Policy T5:

8. Is the Policy approach to car free development justified and effective?

- 8.1 Policy T5 Parking and Car-free Development is considered to be justified and effective. It sets out the Council’s approach to parking and car-free development in Camden. The policy represents a continuation of the existing approach in Policy T2 in the adopted Camden Local Plan 2017 (LD01).
- 8.2 Camden is highly accessible and well connected, with residents in most areas of the borough able to access essential day to day services such as shops, healthcare, education facilities and employment opportunities either by walking, wheeling, cycling, or by public transport, to help them live a fulfilling and healthy life in their local area.
- 8.3 Limiting the opportunities for parking within the borough can reduce car ownership and use and therefore lead to reductions in air pollution and congestion and improve the attractiveness of an area for walking, wheeling and cycling. The Council have pioneered car-free housing policy and the approach has been applied for many years and over a number of iterations of the Local Plan. This has resulted in a decline in vehicle ownership and use in Camden. As a result the majority (65.2%) of Camden households do not have access to a car, and the number of households without access to a car has increased by 19% since 2008-9/2010-11 to 2014/15-16/17. Similarly there has been a year on year 1% reduction in mode share for residents’ trips undertaken by car every year since 2011, from 19% to 13% in 2016/17, demonstrating that growth does not have to be accompanied by an increase in car trips (see paragraph 2.45 of the Camden Transport Strategy LD63).
- 8.4 Car-free development also means that the borough’s limited land can be used more efficiently, helping to free up space to allow additional housing, employment uses, community facilities, play areas, amenity spaces and cycle parking.

- 8.5 The Council does, however, also recognise that some people, businesses and organisations rely on private vehicle use as their only transport option. Parking provision for disabled people and essential uses are therefore considered where necessary.
- 8.6 TfL in their response to the consultation on the Proposed Submission Draft Local Plan stated: “We particularly commend the Council for continuing to have a requirement for car-free development across the borough which continues to set an example for other well-connected local planning authorities in London.” This is confirmed by the Statement of Common Ground between the Council and TfL (ED03I).
- 8.7 The approach taken is also consistent with national and London wide policy. The NPPF (ND01) states that “If setting local parking standards for residential and non-residential development, policies should take into account: a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles (paragraph 112).” Furthermore, Part B of London Plan Policy T6 Car Parking (RD01) states that “Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).”

With reference to Policy T6:

9. Are the requirements of Policy T6 justified and effective?

- 9.1 Draft Local Plan Policy T6 Sustainable Movement of Goods, Services, and Materials is considered to be justified and effective. It sets out the Council’s approach to the sustainable movement of goods, services and materials. The policy represents a continuation of the existing approach in Policy T4 in the adopted Camden Local Plan 2017, which was found sound at examination.
- 9.2 The movement of goods, services, and materials (freight) is fundamental for Camden’s economy and supporting day to day living. However, as this movement largely relies on Camden’s road network, it can have a significant impact on the environment and the health and well-being of residents, in terms of noise disturbance, road safety, and its contribution to road congestion, air pollution, and climate change.
- 9.3 Policy T6, seeks to minimise the movement of goods, services, and materials by road by reducing the number of freight trips generated; shifting freight trips to cleaner, more sustainable and more efficient transport modes, for example cargo bikes; and encouraging freight trips to be undertaken outside of peak hours in

particular locations. This approach is in line with the Council's Freight and Servicing Action Plan (LD68).

- 9.4 This approach is consistent with national and London-wide policy. In particular –
- paragraph 109 of the NPPF (ND01) which states that “Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve.... ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places....and.... understanding and addressing the potential impacts of development on transport networks....and.... realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage”; and
 - London Plan Policy T7 Deliveries, servicing and construction, which requires development plans to facilitate sustainable freight movement by rail, waterways and road.

Monitoring

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

- 10.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.
- 10.2 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.
- 10.3 The Council will monitor transport outcomes as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the Plan's transport objectives the Council will consider whether any policy adjustments or an early review is appropriate.

11. Are any modification necessary for soundness?

- 11.1 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.
- 11.2 The Council has proposed a modification to Policy T1 Safe, Healthy and Sustainable Transport. This is set out in SD51 Schedule of main modifications reference MM84.

11.3 Minor modifications (not relating to soundness) are also required to Policies T1 Safe, Healthy and Sustainable Transport and T2 Prioritising walking, wheeling and cycling and these are set out in SD50 Schedule of minor modifications reference NMM30 and NMM33.