

# London Borough Camden Statement on Matter 10: Site Allocations and Area Based Policies

## Issue 2: South Camden

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

### Questions:

#### With reference to Policy S1:

- 2. How does the designation of Seven Dials as a “Specialist Area” affect its ability to support evening and night-time economy activities?**
  - 2.1 Seven Dials in Covent Garden is designated for its retail offer; however it is also an area with a significant number of residential properties. The designation is long-standing having featured in the adopted Camden Local Plan, and previous iterations of the Plan. However, this has not been a barrier to the provision of evening and night time uses in the area, as our Retail Study finds (EB26).
  - 2.2 The draft Local Plan does not impose a cap on evening and night time uses, however it is appropriate that they are assessed on a case-by-case basis, so the impact on residential properties is considered.
  - 2.3 Seven Dials is a fine grained area, with residential uses interspersed with commercial activity, located generally on lower floors. As part of Lambert Smith Hampton’s Retail and Leisure Study (EB26), a ‘health check’ was undertaken to review Camden’s designated centres, including the Specialist Areas. The consultants found that there were already 17 bars, nightclubs and public houses operating in Seven Dials (which accounted for nearly 7% of premises in the area vs nearly 4% on average in designated centres in the borough). They considered that “the extensive F&B offer is reflected in high footfall levels in the evening period. There is also a reasonable level of footfall in the night time period especially at weekends.” It is clear that while being designated as a Specialist Area, a varied evening economy is being sustained in Seven Dials, with over a quarter of uses identified as “cafes, restaurants, takeaways, bars and public houses” (page 44).
  - 2.4 Camden Planning Guidance on Town Centres and Retail (LD34) considers the character and role of Seven Dials/Covent Garden. It notes its “specialist fashion retailing role with a high proportion of independent retailers... with mostly smaller sized shop premises. The shopping environment is of a high quality, and the retailers tend to occupy the upper end of the market... Covent Garden is considered to be a

retail destination of national and international significance.” (CPG on Town Centres and Retail, paragraphs 3.47 and 3.48). Lambert Smith Hampton’s Retail Study health check confirms that this remains a vital part of the area’s function: “The offer is comparison oriented with a high number of important/branded retailers represented selling clothing, shoes and accessories” and is an “area often used by retailers to showcase their offer and test new instore experiences and products, making it a destination location for their customers”. Given this, it is considered that the Specialist Area designation remains appropriate.

2.5 The Council has identified on the draft Policies Map (SD10) several ‘CAZ Retail Clusters’ but these locations have an overwhelmingly commercial character and tend to have greater separation from residential uses, where they exist. We do not consider there is the same ability to accommodate additional evening and night time uses in Seven Dials as in the other CAZ Retail Clusters due to the mixed commercial and residential character of the Seven Dials area. As highlighted above, where it can be demonstrated that evening and night time uses would not give rise to unacceptable impacts on local amenity, they will be supported.

### **3. What role does the British Museum make to the area? To what extent is this appropriately reflected in Policy S1?**

3.1 The British Museum is one of the most visited attractions in the UK and paragraph 3.3 of the Plan accordingly acknowledges that the British Museum is a “renowned institution” in South Camden.

3.2 Policy S1 South Camden sets out the Council’s overarching strategy for supporting development in this sub-area, focussing on the delivery of new homes, employment and the economy, retail and town centres, and infrastructure provision. Given this, it is not considered necessary specifically to refer to the British Museum, or other individual institutions, within S1 policy.

3.3 The Council have recently adopted the Holborn Vision (LD44) as a Supplementary Planning Document. This sets out the Council’s vision and aspirations for the Museum Quarter around the British Museum, to ensure its continued success. With further detail set out in the draft Bloomsbury Vision public realm strategy (LD92). Camden Planning Guidance on Town Centres and Retail 2021 (LD34) also has a section on the Museum Street area which is home to the British Museum.

### **4. To what extent does the Policy S1 conform with the London Plan?**

4.1 The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden (as shown on the Key Diagram on page 31 of the Plan).

- 4.2 Policy S1 sets out the Council's overarching strategy for supporting development in this sub-area, focussing on the delivery of new homes, employment and the economy, retail and town centres, and infrastructure provision. The approach taken is based on that set out in the topic specific policies in the Plan, and informed by evidence (for example the Infrastructure Delivery Plan EB43) and other Council strategies where relevant.
- 4.3 Within each sub-area, site allocations have also been identified, in accordance with the Council's development strategy, to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities, together with necessary infrastructure, and this is reflected in Policy S1 South Camden.
- 4.4 The policy is intended to guide how development comes forward in this sub-area over the plan period, in line with the Plan's vision and objectives. Other policies in the Plan set out detailed approaches which deliver the requirements of Policy S1.
- 4.5 The Council considers that Policy S1 South Camden is in general conformity with the London Plan 2021 (RD01), in respect of the approach taken to promoting 'good growth' as advocated by paragraph 1.0.1 of the London Plan and policies GG1 – GG6; and in terms of the approach to the CAZ set out in London Plan Policy SD4 The Central Activities Zone (CAZ). Whilst the GLA made comments on the treatment of the CAZ in their response to the consultation on the Proposed Submission Draft Local Plan, they did not raise any concerns in relation to this policy. This is confirmed 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).
- 4.6 London Plan Policy SD4 The Central Activities Zone states that "in development plans boroughs should:
- 1) define the detailed boundaries of the CAZ, the Northern Isle of Dogs, town centres (including the International centres), CAZ retail clusters, Special Policy Areas and specialist clusters of strategic functions having regard to the CAZ Diagram shown in Figure 2.16
  - 2) develop locally sensitive policies to meet this Plan's objectives for the CAZ"
- 4.7 The Local Plan Policies Map (SD10) shows the boundary of the CAZ in Camden. Furthermore, Policy S1 South Camden states that the CAZ (and Knowledge Quarter) will continue to be the main focus of employment development in Camden (Part K). It also supports the specialist clusters of activity in the CAZ (Part M), as well as the CAZ retail clusters and Specialist Shopping Areas (Part S). It is therefore considered that the approach taken in the Local Plan aligns with Policy SD4 of the London Plan.

**With reference to Policy S2:**

**5. What is the purpose of the policy and is the scope appropriate?**

- 5.1 The purpose of Policy S2 Euston Area is to provide an overarching policy context to support the Euston Area Plan, which sets out the planning framework to guide development in the Euston area.
- 5.2 The Euston Area Plan was adopted in 2015 and is currently being reviewed. The updated Euston Area Plan sets strategic objectives and guidelines for development at Euston, in addition to allocating sites for development in the area to deliver a new world class station, new homes, jobs, shops and other community benefits.
- 5.3 Policy S2 was introduced in the Proposed Submission Draft Plan in response to comments received from the GLA on the draft Camden Local Plan at Regulation 18 stage (see ED03u).
- 5.4 The policy sets out the Council's overarching approach to delivering development at Euston and reflects the key development principles set out in the Euston Area Plan. Detailed policies and guidance are then set out in the revised Euston Area Plan (LD93), which is currently at Regulation 19 stage. Given this, it is considered that the scope of the Policy is appropriate.
- 5.5 Euston is identified as an Opportunity Area in the London Plan 2021 and a growth area in the current Camden Local Plan. It forms a key part of the Council's development strategy. It is therefore considered justified and appropriate to include a policy on Euston in the Local Plan to reflect the importance of the Euston Area in meeting the Council's overall development ambitions for Camden and to ensure a robust policy position is maintained while the revised Euston Area Plan is being prepared.
- 5.6 Further information on the relationship between the Local Plan and the Euston Area Plan is set out in Topic Paper TP02.

**6. Should Policy S2 support educational uses in the Euston Area?**

- 6.1 The Council considers that it is appropriate for Policy S2 to support educational uses in the Euston Area and has proposed the following modification to Policy S2 Part A.3:  
“expect development to deliver new and replacement employment floorspace across the Euston Area, and support and prioritise the creation and retention of suitable ~~employment~~ floorspace for employment, education, research, learning and knowledge-based uses;...”
- 6.2 This is set out in SD51 Schedule of main modifications reference MM05.

**7. Is it appropriate for Policy S2 to specify a housing requirement of between 1,500 and 2,500 additional homes with the provision of appropriate replacement homes?**

7.1 The housing capacity figure for the Euston Area included in the Local Plan (Policy S2) reflects the proposals in the draft Euston Area Plan 2023 (LD94). This sets out that the revised housing projection for Euston is based on the outcomes from a design-led capacity study which took into account additional site constraints, less enabled land, higher costs, and viability issues.

7.2 The Council published the Submission Draft of the updated Euston Area Plan (LD93) for consultation in mid-January 2026. This states that:

“Developments in the Euston area are expected to deliver in the region of 2,000 additional homes and optimising the potential of sites to deliver a greater number of homes will be supported (subject to meeting the other policies in the Development Plan). In line with policies in the London Plan and draft Local Plan, additional homes along with the provision of appropriate replacement homes across the whole Euston plan area should be provided as a mix of unit sizes, whilst ensuring a high-quality and inclusive residential environment.” (draft Strategic Principle EAP 1).

7.3 Given this, it is considered appropriate for Policy S2 to continue to specify a housing requirement of between 1,500 and 2,500 additional homes with the provision of appropriate replacement homes. Furthermore, as noted in the Euston Area Plan, due to uncertainty around station designs and proposals for enabling works at Euston, it is not considered appropriate to be more specific about housing numbers at this time.

**With reference to Policy S3:**

**8. What impact will the requirement of Policy S3(d) have on the viability of development? What evidence is there to support this?**

8.1 The draft criterion in Policy S3 continues the existing approach in the adopted Camden Local Plan (LD01). Hatton Garden is a successful centre for jewellery-related products and has experienced low vacancy/ high demand from traders in this sector over the last decade, as evidenced in the Camden Retail and Leisure Study (EB26). This shows that the approach is effective and viable.

8.2 Part D of Policy S3 seeks the retention of retail uses in the designated specialist area, which is appropriate given its established role and that the centre is performing well.

8.3 Hatton Garden is recognised in the London Plan as a Special Policy Area (RD01). Here, paragraph 2.4.15 states that Special Policy Areas are supported, particularly where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to

London's unique identity, economic function or cultural heritage. Examples include... Hatton Garden (jewellery).”

- 8.4 Specialist jewellery retail is the predominant use at ground floor level in this area. The retail function remains viable and enables the direct sale of finished and repaired jewellery products to the consumer.
- 8.5 Hatton Garden's established role is noted by the Camden Retail and Leisure Study: “Hatton Garden is a large centre with a specialist retail offer, reflecting its historical and on-going links with the jewellery trade. The Central London Frontage continues to be dominated by retail shops, almost all of which are occupied by jewellery related businesses and there has been little change in the overall level of provision since 2014.” (page 73)
- 8.6 The Study identified that the vacancy rate in the area was just 1.68% in 2022, the lowest level in a ten year period where the vacancy rate did not exceed 5%. It found that: “The area remains attractive to retailers, with vacant space being taken up by new occupiers.” It did not consider there was a need to support other uses found in centres when the nearby Leather Lane Neighbourhood Centre is able to meet the local community's needs and has potential capacity to expand and diversify its own offer.
- 8.7 Policy S3 Part D reflects the Council's wider approach to managing centres in draft Policy IE6 Part A 1 which states the Council will “seek to protect and enhance the role and distinctive character of each of Camden's centres, ensuring that new development is of an appropriate type, scale and character for the centre in which it is located...” and Policy IE6 Part A. 7 stating the Council will “resist the loss of active ground floor uses visited by members of the public to ensure the vitality of the centre is sustained”.

**9. Should Policy S3 enable the delivery of uses that are alternative to jewellery such as office space?**

- 9.1 The Council consider that enabling the delivery of uses alternative to jewellery in Policy S3 would undermine the Hatton Garden specialist jewellery cluster contrary to the objectives of the Local Plan, London Plan and national policy.
- 9.2 The approach is supported by the Economic Needs Assessment (EB23) which informed the Local Plan and a continuation of existing policy in the adopted Local Plan, which has helped to preserve and enhance the special character of Hatton Garden as an internationally important cluster of jewellery manufacture and trade.
- 9.3 The Hatton Garden area is home to hundreds of businesses across the whole supply chain of jewellery-making, from artists and designer makers to wholesale and retail. Protecting the pre-eminent role of this cluster of uses is in line with paragraph 87 of

the National Planning Policy Framework which states planning policies “...should recognise and address the specific locational requirements of different sectors”. This includes making provision for “clusters or networks of...creative or high technology industries.” Hatton Garden is a unique and vital component of the creative industries in Camden.

- 9.4 Policy SD4 of the adopted London Plan 2021 (RD01) relates to the Central Activities Zone (CAZ) where a “specialist clusters including... creative and cultural activities, and other more local Special Policy Areas should be supported and promoted” (Part G). Paragraph 2.4.15 says that Special Policy Areas should be supported “where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London’s unique identity, economic function or cultural heritage. Examples include... Hatton Garden (jewellery).”
- 9.5 Policy S3 is also in line with the Council’s adopted Affordable Workspace Strategy (LD60) which considers access to affordable premises across different sectors in the borough. On Hatton Garden, it says: “With a history as a centre of jewellery making stretching back 800 years, Hatton Garden retains a hyper-dense cluster of jewellery-related businesses. Demand from other commercial sectors, rising rental costs and the loss of jewellery workspace has represent significant threats to sector. Affordable jewellery workspace is therefore the priority use within Hatton Garden.”
- 9.6 Camden’s Economic Needs Assessment (ENA) reviews the role and functions of key light industrial clusters in the borough, of which Hatton Garden is one. The consultants’ (Aecom) engagement with property agents revealed that the Hatton Garden area is also becoming increasingly popular with media and digital companies, which has resulted in spaces suitable for jewellers being converted to accommodate these higher value tenants and uses. The study concludes that the policy should aim to protect the supply of such workspaces from conversion to office space (paragraph 6.6.2).
- 9.7 During a site visit, Aecom found that “few vacancies were observed among the jewellery workshops within Hatton Garden”. Hatton Garden is a small area which is in close proximity to dynamic office markets in ‘Midtown’ (which covers the wider Holborn area) and the City of London. These locations are subject to sustained high demand for Grade A+ office space, accompanied by rising rents for the best quality space. The ENA found some evidence of new office space being brought to market in Hatton Garden, however vacancy levels for such space were high for central London (paragraph 6.6.3). This is likely due to the immaturity of Hatton Garden as an office location and its more limited ability to provide the size, amenity and layout of office space investors and tenants in central London particularly seek.
- 9.8 The ENA also reviewed the stock of premises available to support the jewellery sector. It found that many of the jewellery businesses occupy smaller to medium sized properties, often in older converted properties: “workshops are often small in

size and located on the ground or first floors of buildings. They are generally located in older properties and are of good quality” (paragraph 1.5.6). The stock of premises is therefore generally suitable for meeting the needs of the jewellery sector. While the premises remain suitable and viable for occupation by the jewellery sector (and small businesses more generally, in 2017 98% of businesses in Hatton Garden employed only 1-9 employees), they are less well suited to meeting the needs of potential office tenants requiring a central London location, particularly the agglomeration of “significant offices and company headquarters” highlighted in Policy SD4 of the adopted London Plan. As Hatton Garden is a very small area in the context of Central London as a whole and does not have a well-established office market, the Council considers that the floorspace targets in draft Local Plan policy IE2 for office and research and development uses can and should be met elsewhere in Central London and within designated town centres. Further, we also consider this is a reasonable approach when the ENA finds that there have only been limited additions to the stock of jewellery spaces over the last decade, continuing low vacancy levels and that the jewellery sector is continuing to grow in terms of its economic value and numbers of jobs it supports, for example between 2015 and 2021, employment in the jewellery industry in Camden experienced a high level of growth (+4.78%) (paragraph 1.8.9 of the ENA).

- 9.9 Applying policy operative in the rest of central London would not recognise the ‘special’ nature of Hatton Garden nor would this support long-standing efforts by the Council and others to ensure the area’s character is preserved and its function as a centre for the jewellery industry sustained.
- 9.10 The introduction of Class E is likely over time to lead to reductions in jewellery workshop space in the Hatton Garden area. This serves to heighten the need for policy that protects jewellery-related uses as far as possible. The Council have introduced an Article 4 Direction removing the permitted development right to change from Class E to residential, meaning that the impact of additional housing on the balance and mix of uses in Hatton Garden can be managed in accordance with our planning policies. The Council recognises that employment clusters in the borough evolve over time as business needs and demands change. However, it is important not to lose spaces that remain viable and occupied.
- 9.11 Where planning applications propose the loss of jewellery workshop space, we will apply the approach set out in draft Policy IE3 on Industry. The applicant will need to demonstrate that the potential for the site to remain in industrial use is low and will be expected to provide marketing evidence in line with the draft Local Plan’s approach for offices and demonstrate through viability evidence why there is no realistic option for retaining an industrial use, including, where relevant through the upgrading and refurbishment of premises (paragraph 9.49).
- 10. Is the requirement in Policy S3(c) that seeks to deliver 50% of additional floorspace in developments of more than 200sqm at 50% below market value**

**for equivalent jewellery related uses in the Hatton Garden justified and effective?**

- 10.1 The Council considers that the approach in Policy S3(c) is justified and effective.
- 10.2 The threshold of 200sqm is based on the relatively smaller size of schemes/sites that typically come forward in Hatton Garden. Furthermore, Camden's Economic Needs Assessment (EB23) notes that many of the existing jewellery-related uses occupy premises that are small in size with buildings typically across a range of four to eight storeys (paragraphs 6.6.1 and 6.6.2). The whole of the Hatton Garden area is also designated as a conservation area with many buildings being heritage assets in their own right. The scope for larger scale developments is relatively limited. Having a higher threshold in the policy is likely to reduce the total number of schemes that would be able to provide additional jewellery workspace. We therefore consider the threshold is justified based on local circumstances. As the response to Question 9 above sets out, the Council considers it is appropriate in Hatton Garden that space for jewellery workshops and related uses is the priority land use, not general office space.
- 10.3 The 50% discount is based on the experience of the Council's Inclusive Economy team in negotiating new jewellery workspace in relevant schemes under existing Local Plan policy. They have found that significant discounts are required in order to meet user demands and needs. Given the Central London location of Hatton Garden and the potential difficulties for new businesses to establish a foothold in the area, the Council considers that the 50% provides a realistic and effective benchmark. It will help address the challenges identified by the Council's Affordable Workspace Strategy (LD60) for jewellery related businesses in finding suitable premises in the Hatton Garden area.
- 10.4 The Council acknowledges that a range of factors can influence the rent that may be charged and/or the ability of businesses to take up space. These include the size of premises, specification, condition, the availability of communal facilities and location of jewellery workspace within an individual building or the Hatton Garden area. Business rates and service charges may also have an impact on affordability. The Council will therefore apply the policy flexibly whilst seeking to "negotiate the greatest discount to market rents that is viable", as set out in paragraph 3.26 of the draft Plan.

**With reference to Policy S4:**

**11. Is reference to "University of London or its member institutions" an appropriate term of reference in Policy S4?**

- 11.1 The Council considers that "University of London or its member institutions" is an appropriate term of reference in Policy S4 Bloomsbury Camous Area.

11.2 The area covered by Policy S4 is at the heart of higher education in Camden, providing the main base for the University of London and several member institutions including UCL (University College London), SOAS (the School of African and Oriental Studies), London School of Hygiene and Tropical Medicine, and Birkbeck. This is recognised in paragraph 3.30 of the Plan. Given this, it is considered that the wording in the Policy is appropriate.

**12. Is Policy S4 sufficiently flexible to enable Higher Education institutions to adapt to meet changing needs?**

12.1 The Council considers that the Plan contains sufficient flexibility to enable on-balance judgements to be made to enable Higher Education institutions to adapt to meet changing needs. Any application for the conversion of educational facilities would be considered against all relevant policies in the Plan, including Policy S4 Bloomsbury Campus Area and Policy SC3 Social and Community Infrastructure.

Here, paragraph 3.40 of the Plan states...

“This Plan identifies self-contained housing as the Council’s priority land use across the borough. However, given the existing concentration of higher education in the Campus Area, the benefits of co-locating university facilities, and the high value and limited supply of land, the Council will give a high priority to development of academic and ancillary facilities for the University of London in the Campus Area”.

Whilst paragraph 10.57 of the Plan states...

“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.”

**13. How was the boundary map for Policy S4 determined? Is it justified and effective?**

13.1 The Bloomsbury Campus Area extends over 22 hectares between Euston Station and the British Museum and contains a concentration of university-related buildings and activities.

13.2 The site area where Policy S4 applies, as shown on the Policies Map (SD10) and Figure 9 of the Plan, is based on the area identified in the Council’s Town Centres CPG (2021) (LD34) on page 44.

13.3 The campus area is considered to be the core area where university buildings predominate and while we acknowledge that there are other university related buildings outside this area, the character of the surrounding area is more mixed,

including residential uses, and we therefore do not consider that it is appropriate for the provisions of Policy S4 to apply there.

- 13.4 Whilst Policy S4 applies in the defined campus area, the supporting text to the policy acknowledges there are many higher education institutions and facilities in other parts of Camden. These will continue to be supported by the Council subject to compliance with relevant development plan policies.
- 13.5 The Council therefore considers that the extent of the Bloomsbury Campus Area designation is justified and effective.

**With reference to the site allocations:**

**Site Allocation S6**

- 14. Is residential development at this location compatible with the adjacent cement and aggregates rail depot?**
- 14.1 The Council considers that residential development on site allocation S6 - 104 - 114 Camley Street and Cedar Way Industrial Estate is compatible with the adjacent cement and aggregates rail depot use.
- 14.2 The policy includes a criterion (8) to ensure that the design and layout of the proposed scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities in accordance with the 'Agent of Change' principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity).
- 14.3 Furthermore, criteria 15 and 16 of the policy state that development must ensure that proposals for the redevelopment of this site appropriately consider their impact on the railway and its operations and be designed and located so as not to prejudice the continued operation of the aggregates transshipment facility which straddles the railway immediately east of this site.
- 14.4 It should also be noted that the Council has recently resolved to grant planning permission for the mixed use re-development of the northern part of this site to provide residential and commercial uses, subject to a Section 106 Agreement. The appropriateness of residential uses on this site was considered as part of the planning application, and considered to be acceptable.

**Site Allocation S8**

- 15. What are the site constraints facing this site and to what extent is this reflected in the policy requirements?**

- 15.1 The site constraints for site allocation S8 - St Pancras Hospital were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the site allocation policy as necessary. Where measures are needed to mitigate any identified constraints, these are also identified.
- 15.2 The key site constraints and mitigation identified in the policy are:
- Flood risk. Here the policy states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding.
  - The site is within the St Pancras Gardens sub-area of the King's Cross St. Pancras Conservation Area and adjacent to St Pancras Old Church Garden, which is a designated heritage asset and Grade 2 Site of Importance for Nature Conservation. Here, criterion 4 states that development must be designed to conserve or enhance existing heritage assets, including building, spaces and the adjacent St Pancras Gardens, recognising their contribution to the character of the conservation area, and seek to retain and restore buildings that make a positive contribution in accordance with Policy D5 (Historic Environment).
  - The site is adjacent to the Regent's Canal and Regents Canal conservation area. Here criterion 10 states that development must incorporate measures to manage the effects of lighting on the Canal to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.
  - The 'other considerations' section of the policy recognises that part of the site is within a viewing corridor set out in the London View Management Framework SPG.

## **16. Are the uses identified for the site appropriate?**

- 16.1 The site (S8) is allocated for health, permanent self-contained homes, education, and employment (including research and knowledge base uses, light industrial, maker spaces, offices).
- 16.2 The allocated uses reflect the fact that part of the site has planning permission (2020/4825/P) for a new purpose-built facility for Moorfields Eye Hospital, University College London and Moorfields Eye Charity.
- 16.3 The allocated uses proposed for the remainder of the site reflect the objectives set out in the Council's Canalside to Camley Steet SPD (LD49); the Council's priority for self-contained homes to meet housing need; and support for growth sectors including knowledge and creative based uses and maker spaces, given the location of the site in the Knowledge Quarter. The approach taken is also consistent with Policy DS1 Delivering healthy and sustainable communities Part A, which expects development to meet the needs for new homes and jobs and provide a mix of uses.

Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

## **17. Are the requirements of the policy justified and consistent with national policy?**

17.1 The policy sets out a number of requirements. These relate to –

- Ensuring that a comprehensive approach is taken to the design and layout of the site (1) and that the delivery of the site is taken forward in a co-ordinated way (2). This is in line with Policy DS1 Part A.11 and therefore considered justified;
- Optimising the provision of self-contained homes (3). This is in accordance with Policy H1 and considered justified due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs;
- The protection of heritage assets (4). This is considered justified due to the need to mitigate any impacts on adjacent heritage assets in line with Policy D5;
- Creating an active and engaging street frontage (5); creating new public routes for pedestrians and cyclists (6); open space provision (7); reinforcing the role of the Granary Street / Camley Street junction as a key gateway location (8); design (9) and viewing corridors (other considerations). This is in accordance with Policy D1 and therefore considered justified;
- Managing the effects of lighting on the Regents Canal (10). As the Regents Canal is a designated Site of Importance for Nature Conservation and a protected open space, it is considered justified to mitigate any impact on the canal.
- Building heights. This is 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. It is therefore considered justified;
- Securing contributions to the creation of a new canal crossing (11). This is considered justified in accordance with Policy T2;
- Flood risk (other considerations). This is in accordance with Policy CC10 and therefore considered justified;
- Upgrades to water supply infrastructure (other considerations). This reflects the comments made by Thames Water on the Plan and is considered justified;
- The retention of existing buildings (other considerations). This is in accordance with Policy CC2 and therefore considered justified.

17.2 The Council therefore consider that the requirements of the policy are justified to guide the development of the site and ensure that any identified constraints are effectively mitigated.

17.3 Furthermore, the Council considers that the approach taken in the policy is also consistent with the NPPF (ND01), in particular –

- Paragraph 16 which states that “Plans should: a) be prepared with the objective of contributing to the achievement of sustainable development; b) be prepared

positively, in a way that is aspirational but deliverable; c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals...”;

- Paragraph 124 which states that “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”;
- 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. Being clear about design expectations, and how these will be tested, is essential for achieving this.”;
- Paragraph 162 which states that “Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk”; and
- Paragraph 203 which states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.”

## **18. Is criterion 4 of the policy necessary and effective and is it consistent with Policy D5?**

- 18.1 The site is within the St Pancras Gardens sub-area of the King’s Cross St. Pancras Conservation Area and adjacent to the Regent’s Canal conservation area. The King’s Cross and St. Pancras Conservation Area Appraisal (LD52) identifies a number of positive contributors within and adjacent to the site. Here, the appraisal notes that the east and west Hospital Wings and the Residence Building around the edge of the Grade II listed St Pancras Gardens are arguably the most cohesive and important collection of buildings on the site and that the water tower in the central section is a distinct landmark. St Pancras Gardens is also a Grade 2 Site of Importance for Nature Conservation and a designated historic park and garden.
- 18.2 The Council consider that criterion 4 is therefore necessary given the site is within a conservation area and adjacent to St Pancras Gardens, a designated heritage asset.
- 18.3 This approach is also endorsed by Historic England (see meeting notes from the 5 September 2024 on pages 37/38 of the Statement of Common Ground between the Council and Historic England ED03m) and consistent with national policy and the Council’s statutory duties in relation to heritage.

- 18.4 The policy is considered effective in that it would ensure full consideration of heritage aspects at the planning application stage. The criterion is considered consistent with Policy D5, with the modification proposed in the schedule of main modifications (SD51) reference MM16.

### **Site Allocation S10**

**19. What are the site constraints facing this site and to what extent is this reflected in the policy requirements?**

19.1 The site constraints for this site allocation S10 Bangor Wharf and Eagle Wharf were considered as part of the site selection and assessment work, as set out in Appendix B, E, H, K, N of the Site Selection and Allocation Topic Paper (TP03). Key constraints are then set out in the site allocation policy as necessary. Where measures are needed to mitigate any identified constraints, these are also identified.

19.2 The key site constraints and mitigation identified in the policy are:

- The site is within the Regent's Canal Conservation Area and the Conservation Area Appraisal and Management Strategy identifies the former forage warehouse at Eagle Wharf and former dock as positive contributors. Here, criterion 4 states that development must retain and enhance the wharf building at Eagle Wharf; criterion 8 states that development must be of a form and scale which is appropriate to the Regent's Canal Conservation Area, and responds to the open character of this part of the Canal and to surrounding listed buildings, and respects the amenity of neighbouring residents; and criterion 13 states that development must retain or reuse (on site) the granite setts at Bangor Wharf.
- The site is immediately adjacent to the Regent's Canal (Grand Union Canal), which is a designated Site of Importance for Nature Conservation (SINC), open space, and Green Corridor. Here, criterion 11 states that development must contribute to improvements in the biodiversity of the Canal, which is designated as a Site of Importance for Nature Conservation; and criterion 12 states that development must incorporate measures to manage the effects of lighting on the Canal to avoid light pollution, protect biodiversity and allow for the continued use of the canal corridor by protected bat species.
- Flood risk. Here the policy states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is larger than 1 hectare and identified by the Council as being at risk of flooding.
- The 'other considerations' section of the policy recognises there is a critical trunk sewer running through this site which would need to be appropriately considered through the planning and design stage.

**20. What evidence is there to demonstrate that housing can be delivered on the site?**

20.1 The site is allocated to deliver a mixed use development including self-contained homes and employment use. The indicative capacity is for 50 homes to be delivered across the site (Bangor and Eagle Wharf).

20.2 Whilst the site is currently occupied as offices, studios and storage it is located in a predominantly residential area and therefore considered appropriate for mixed use development, incorporating residential. This is also in line with Policy H2 Maximising the supply of self-contained housing from mixed-use schemes, which promotes the inclusion of permanent self-contained housing as part of a mix of uses and applies in the defined South Camden sub-area where this site is located. There is nothing to distinguish this site from the many other sites which have been successfully brought forward for mixed-use development in the borough. The Council therefore do not consider there to be any reason why housing cannot be delivered on this site over the plan period. Given the identified need for housing in Camden, it is considered justified and necessary for the Council to take every available opportunity to deliver additional housing, in line with Policy H1 and Policy H2.

20.3 The Local Plan Viability Study (EB01) appraised a range of development typologies, which are representative of development across Camden to assess the cumulative impact of the Plan's policies on viability, rather than focussing on individual site allocations. This is consistent with Paragraph 003 of the Viability Planning Practice Guidance, which states that:

“Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.”

20.4 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.

**21. How will multiple ownership of the site effect delivery?**

21.1 The site allocation is in two separate ownerships. Criteria 1 and 2 are included in the allocation to ensure a comprehensive approach is taken to site design and layout and that development is taken forward in a co-ordinated way.

- 21.2 This is considered to be an appropriate approach and is in accordance with Local Plan Policy DS1 Delivering Healthy and Sustainable Development criterion 11 and consistent with the approach taken to other allocated sites. Given the wording of the allocation, it is not considered that the delivery of the site would be adversely affected by the fact that the site is in two separate ownerships.

### **Site Allocation S13**

#### **22. Are the identified uses for the site justified and appropriate?**

- 22.1 Site S13 Former Thameslink station, Pentonville Road is allocated to deliver employment (including research and knowledge based uses, maker spaces, offices) and permanent self-contained homes.
- 22.2 The allocated uses reflect the Council's priority for self-contained homes to meet housing need; and support for knowledge and creative bases uses and maker spaces, given the location of the site in the Central Activities Zone and Knowledge Quarter.
- 22.3 Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

#### **23. Are tall buildings justified in this location?**

- 23.1 This site is not identified as a location where a tall building may be an appropriate form of development, reflecting the findings of the Camden Building Heights Study (EB34). The site is within the King's Cross Conservation Area, between a Grade II listed building and a building identified as a positive contributor to the conservation area. It also lies within two strategic viewing corridors identified in the London Plan (RD01) and the London View Management Framework SPG (RD02).
- 23.2 Any proposal for a tall building on this site would need to take account of these constraints and be assessed against the allocation, Local Plan Policy D2 Tall Buildings, London Plan Policy D9 Tall Buildings, and all other relevant policies.

### **Site Allocation S20**

#### **24. What impact will surrounding uses have on the proposed residential development?**

- 24.1 The Council considers that Site Allocation 20 York Way Depot and adjacent land at Freight Lane includes appropriate criteria to ensure that residential development as part of a mixed use scheme is compatible with surrounding uses.

- 24.2 The policy includes a criterion (6) to ensure that the design and layout of the proposed scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities in accordance with the Agent of Change principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity).
- 24.3 Criteria 11 and 12 of the allocation state that development must ensure that proposals for the redevelopment of this site appropriately consider their impact on the railway and its operations and be designed and located so as not to prejudice the continued operation of the aggregates transshipment facility which straddles the railway immediately east of this site.

### **Modifications:**

**25. Overall, are any modifications required to site allocations in South Camden for soundness?**

- 25.1 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.
- 25.2 The Council has proposed modifications to Site Allocations S5, S6, S7, S8, S9, S11, S16 and S30. These are set out in SD51 Schedule of main modifications reference MM11 – MM21.

### **Issue 3: Central Camden**

**Whether the proposals for Central Camden are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.**

#### **With reference to Policy C1:**

**26. Do the requirements set out in Policy C1 provide sufficient detail to be effective?**

- 26.1 The Council considers that Policy C1 Central Camden provides sufficient detail to be effective.
- 26.2 The Local Plan takes an area-based approach to support and guide the delivery of new development in the borough, focussing on the sub-areas of South Camden, Central Camden, West Camden and North Camden (as shown on the Key Diagram on page 31 of the Plan).
- 26.3 Policy C1 sets out the Council's overarching strategy for supporting development in this sub-area, focussing on the delivery of new homes, employment and the

economy, retail and town centres, and infrastructure provision. The approach taken is based on that set out in the topic specific policies in the Plan, and informed by evidence (for example the Infrastructure Delivery Plan EB43) and other Council strategies where relevant.

26.4 Within each sub-area, site allocations have also been identified, in accordance with the Council's development strategy, to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities, together with necessary infrastructure, and this is reflected in Policy C1 Central Camden.

26.5 The policy is intended to guide how development comes forward in this sub-area over the plan period, in line with the Plan's vision and objectives. Other policies in the Plan set out detailed approaches which deliver the requirements of Policy C1.

**27. With regards criterion O(1), is step free access at Chalk Farm station deliverable? If not are amendments to the policy necessary?**

27.1 Policy C1 Part O sets out key infrastructure priorities for the central area of the borough. Reference to the delivery of step-free access at Chalk Farm Underground Station was included at Part O. 1 in response to the comments made by TFL on the draft Local Plan at Regulation 18 stage.

27.2 TFLs comments on the Proposed Submission Local Plan at Regulation 19 stage welcome the amendments made to Policy C1 to include Chalk Farm station as a priority for step-free access. However, they go on to state that "further investigation internally has found that it will be exceptionally challenging to deliver step-free access at this station. While there may still be an opportunity to do so, it will be dependent on providing access from Site Allocation C8 Former Morrisons petrol filling station."

27.3 Given this, the Council still considers it justified to identify the delivery of step-free access at Chalk Farm Underground Station as a key infrastructure priority for the central area, in line with TFL's aspirations.

27.4 The Statement of Common Ground between the Council and TFL sets out an agreed position in relation to this (see ED03I).

**28. With reference to criterion O(3), does the Plan provide clear evidence that the objectives of supporting the Camden Highline and reinstating 4 tracks and a third platform at Camden Road station compatible. If not, how does the policy resolve the conflict?**

28.1 The Plan reflects the fact that planning permission has been granted for the first phase of the Camden Highline between Kentish Town Road and Royal College Street

including Camden Gardens and 223 Royal College Street and Camden Road Railway Station, Camden Road.

- 28.2 The Plan also acknowledges the comments made by TFL on the draft Local Plan at Regulation 18 that the policy should be updated to reflect the potential need to reinstate four tracks and a third platform on the North London line from 2030 to meet future passenger and freight demand (see Statement of Common Ground with TFL ED03I). TFL have advised that provisions have been made in the disposal for this land for it to be returned to operational rail use when necessary.
- 28.3 Given this, the Plan is supportive of both the Highline and the upgrade to the north London line to re-instate four tracks and deliver a third platform at Camden Road overground station. The Council envisages that these projects would be taken forward sequentially. It is therefore considered that both objectives are compatible. Neither the promoters of the Highline or TFL have raised an objection to the approach taken in Policy C1 Part O in respect to this.

#### **With reference to Policy C2:**

#### **29. Do the requirements of the policy give sufficient priority to pedestrians?**

- 29.1 The Council considers that Policy C2 Regis Road and Holmes Road depot gives sufficient priority to pedestrians through a number of specific criteria, particularly:
- Criterion 12 – ensure that the design and layout of the site gives priority to the movement of pedestrians, people using wheelchairs, cyclists and public transport over the operational, servicing and parking demands of private vehicles and that vehicle movements and parking provision are minimised. Where new and/or improved routes are provided, these should be designed to be inclusive, accessible, welcoming, safe, green, well-lit and overlooked;
  - Criterion 24 – ensure that Regis Road is transformed into a green pedestrian and cycling route by moving large vehicles on to a separate service road in advance of any significant commercial development. This should be included as part of the Phasing Plan required for the development;
  - Criterion 25 – provide a new safe and attractive pedestrian and cycle route between Regis Road and Kentish Town Road via York Mews; and the wider area; and
  - Criterion 26 – provide a new pedestrian and cycle route between Regis Road and Arctic Street.
- 29.2 To manage a diverse and often conflicting demand for limited carriageway, footway and kerbside space, the Council currently adopts a road user hierarchy, which prioritises the most efficient, sustainable, and healthy modes of travel - walking, wheeling, cycling and public transport. This approach is set out in the Council's Transport Strategy (LD63) and is reflected in the approach taken in this Local Plan, which seeks to improve the conditions for pedestrians, cyclists (including disabled pedestrians and cyclists) and public transport users in the borough.

29.3 Any application for this site would also be assessed against all relevant Local Plan policies including those on Transport. Policy T1 Safe, Healthy and Sustainable Transport Part A.2 states that the Council will “expect development that involves changes to existing, or the provision of new streets, to implement the Mayor’s Healthy Streets approach, to ensure that streets are designed to be attractive, safe, inclusive and accessible for all, giving particular attention to the needs of older people, users with disabilities, neurodiverse people, women, girls and gender diverse people in accordance with the Mayor’s Healthy Street approach” and that “all major development proposals will be required to include a Healthy Streets Assessment as part of a Transport Assessment.” With Policy T2 then setting out the Council’s approach to promoting active travel by prioritising walking, wheeling and cycling in Camden.

**30. Is a comprehensive masterplan for the site deliverable and would piecemeal development achieve regeneration and the strategic objectives for the area? What evidence is there to support this?**

30.1 The Council supports a comprehensive masterplanning approach for this site in accordance with Policy DS1 Delivering Healthy and Sustainable Development, the adopted Kentish Town Planning Framework (ref LD46) and Regis Road Area Guidance (Ref LD47), as it considers this will best achieve the regeneration and strategic objectives for the area.

30.2 The Context section of the allocation suggests that “proposals should be progressed through a comprehensive masterplanning process, informed by the Kentish Town Planning Framework and the Regis Road Area Guidance”. However, it does not prevent development coming forward in phases, through the submission of separate planning applications, provided schemes are taken forward in a co-ordinated way consistent with the objectives set out in the allocation and do not prejudice future development and design quality across the whole site and wider area in accordance with criterion 22 of the policy.

30.3 It is considered that Policy C2, taken alongside the Local Plan as a whole, adopted Planning Frameworks and the Kentish Town Neighbourhood Plan (LD10) provides a robust planning framework that will ensure that, when schemes come forward for the site, whether as a single application or more than one application, they achieve the Council’s regeneration and strategic objectives for the area.

**31. Does the policy enable vehicular and pedestrian access to the Big Yellow store? Are any modifications required for soundness**

31.1 The Council considers that the policy enables vehicular and pedestrian access to be maintained to the Big Yellow store.

- 31.2 For clarity, the Council has proposed a modification to criterion 24 to read -  
'ensure that Regis Road is transformed into a green pedestrian and cycling route by moving large vehicles on to a separate service road where possible in advance of any significant commercial development provided as part of the redevelopment. This should be included as part of the Phasing Plan required for the development'.
- 31.3 This is set out in in SD51 Schedule of main modifications reference MM22.
- 31.4 This would retain vehicular and pedestrian access to the site in accordance with the adopted planning framework objectives. No further modifications are considered necessary for soundness.

## **32. Does the policy provide sufficient flexibility?**

- 32.1 It is considered that the site allocation and the policies in the Local Plan as a whole contain appropriate flexibility to enable 'on balance' assessments to be made when any planning applications relating to this site are considered, and to respond to changing circumstances where necessary.

### **With reference to Policy C3:**

## **33. Do the requirements of the policy give sufficient priority to non vehicular modes of travel through the site?**

- 33.1 Site allocation C3 Murphy Site is considered to give appropriate and sufficient priority to non vehicular modes of travel through the site.
- 33.2 The policy promotes new pedestrian and cycling connections both into and within the site to facilitate pedestrian and cycling movement. Specifically –
- Criterion 20 seeks to ensure that the site is designed to minimise vehicle movements and parking;
  - Criterion 22 seeks to ensure that conflict between servicing traffic and public areas is minimised, with separation as far as possible;
  - Criterion 24 promotes a new key pedestrian priority route through the site, the Heath line; and
  - Criterion 27 promotes new pedestrian and cycling connections to adjacent sites. These connections include a new north-south cycle route from Kentish Town to Highgate Road and a new pedestrian and cycle bridge across the railway line, to connect the Murphy and Regis Road sites, to facilitate pedestrian and cycling movement and provide connections to the wider area.
- 33.3 As set out in the Camden Transport Strategy (LD63), the Council prioritises the most efficient, sustainable, and healthy modes of travel - walking, wheeling, cycling and

public transport. This is reflected in the approach taken in this Local Plan, which seeks to improve the conditions for pedestrians, cyclists including disabled pedestrians and cyclists) and public transport users in the borough.

- 33.4 Any application for this site would also be assessed against all relevant Local Plan policies including those on Transport. Policy T1 Safe, Healthy and Sustainable Transport Part A.2 states that the Council will “expect development that involves changes to existing, or the provision of new streets, to implement the Mayor’s Healthy Streets approach, to ensure that streets are designed to be attractive, safe, inclusive and accessible for all, giving particular attention to the needs of older people, users with disabilities, neurodiverse people, women, girls and gender diverse people in accordance with the Mayor’s Healthy Street approach” and that “all major development proposals will be required to include a Healthy Streets Assessment as part of a Transport Assessment.” With Policy T2 then setting out the Council’s approach to promoting active travel by prioritising walking, wheeling and cycling in Camden.

#### **34. Are the uses identified for the site appropriate?**

- 34.1 The uses identified for allocation in Policy C3 are considered appropriate. The site is allocated to deliver industry / employment; permanent self-contained homes and student accommodation, community uses and open space. The indicative housing capacity for the self-contained homes is 750 additional homes.
- 34.2 The Murphy site forms part of the Kentish Town Industry Area, which is considered to be a Locally Significant Industrial Site (LSIS) in terms of the London Plan.
- 34.3 Part of the site lies within the Dartmouth Park neighbourhood area and part lies within the Kentish Town neighbourhood area. The site is identified in the Kentish Town Neighbourhood Plan as being within the Kentish Town Potential Development Area. The Plan supports the mixed-use redevelopment of the site for housing, business and industrial uses. The Dartmouth Park Neighbourhood Plan identifies the site as providing an opportunity for development for a mix of residential and business/ employment units, to enhance the area, and sets out aspirations for any development.
- 34.4 The allocation promotes the comprehensive redevelopment of the site, which is characterised by low density industrial use with areas of yard space and parking.
- 34.5 The allocation seeks to deliver an employment-led development, designed to create a vibrant, sustainable new mixed-use area, taking the opportunity for significant intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses. The site is not considered appropriate for leisure, cinema or hotel uses as it is not within an identified town centre.

- 34.6 The uses reflect the Council's priorities for this site in terms of promoting a mixed use development that intensifies industrial and other employment uses, reflecting the designation of the Kentish Town Industry Area, whilst also helping meet the Local Plan housing target and providing uses for a mixed community. The allocation will also deliver 750 homes, which will contribute towards meeting Camden's need for housing.
- 34.7 Furthermore, the Council considers that the approach taken in relation to this site is in line with Policy E7 Industrial intensification, co-location and substitution of the London Plan (RD01).

**With reference to the site allocations:**

**Site Allocation C4**

**35. Does the wording of the policy make it clear that a continuing police use presence is expected on the site?**

- 35.1 The Council consider that it is clear that a continued police use presence is expected on this site. Police facilities are included in the allocated use and criterion 1 of the policy requires that development must provide for continued police facilities on site, either alone or part of a mixed use development.
- 35.2 The site is subject to a current planning application ref 2025/4861/P which includes the relocation of the police services from the 'Station House' to the 'Section House' buildings within the site as part of a wider redevelopment scheme.

**36. Is a pedestrian and cycle link between Holmes Road and Regis Road justified and effective?**

- 36.1 The Council consider that a pedestrian and cycle link between Holmes Road and Regis Road is both justified and effective. This would provide a safe and attractive walking, wheeling and cycling route, helping to improve connectivity and permeability to the area and helping to promote more active travel.
- 36.2 A pedestrian and cycle route between Holmes Road and Regis Road through this site, forms part of the current planning application being considered for this site and the wider Regis Road site (Planning ref 2025/4861/P).

**37. Are the uses identified for the site appropriate?**

- 37.1 This site is allocated to deliver police facilities, permanent self-contained homes and student accommodation. The Council considers that these allocated uses are

appropriate, as they reflect the need to protect the existing police service facilities on the site, while seeking to optimise residential use to contribute towards meeting Camden's need for housing.

- 37.2 Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

### **Site Allocation C5**

**38. Should criterion 6 of Policy C5 include reference to improvements to bus shelter provision in addition to its relocation?**

38.1 Criterion 6 of site allocation C5 369 - 377 Kentish Town Road states that development must contribute towards the relocation of the bus shelter. This is considered necessary to improve passenger and pedestrian safety, given the potential pinch point adjacent to the site that would arise from the development of this site, and is consistent with aspirations for a new Kentish Town Square. It was a requirement of the planning permission granted for the development of the site and the Section 106 agreement.

38.2 It should however be noted that the Site Allocation policies have been written to be read with the other policies in the Plan. Part A of Policy T3 Public Transport would therefore also apply here. This states that... "To safeguard and promote the provision of public transport in the borough the Council will seek to ensure that development contributes towards improvements to bus network infrastructure..." Given this, it is not considered necessary to refer to the need for 'improvements to the bus shelter' in addition to its re-location in Policy C5.

### **Site Allocation C6**

**39. Is it clear what is meant by "alternative community use?"**

39.1 The site allocation seeks to retain the existing fire station use as part of a mixed use development. Emergency service uses are considered a social and community infrastructure use (see paragraph 10.40 of the Plan). If the fire station is declared surplus to requirements, then an alternative community use should be considered in line with Policy SC3 Social and Community Infrastructure.

### **Site Allocation C7**

**40. Should the policy identify whether the water supply and wastewater network can accommodate the development?**

40.1 In their response to the consultation on the Proposed Submission Draft Plan, Thames Water (responder ID409) noted that: 'this site has planning approval, so we

have not undertaken any further assessment. If the proposal changes, we will need to reassess'. As planning permission has been granted and development is under way, the reference is not considered necessary. A main modification is proposed in the schedule of proposed main modifications (SD51) reference MM28 to remove reference to the need to liaise with Thames Water early in the design process to investigate whether the existing water and wastewater network.

**41. Are the requirements of the Policy consistent with Policies H1 (Maximising housing supply), H4 (Maximising the supply of affordable housing) and the London Plan?**

- 41.1 It is considered that site allocation C7 Morrisons Supermarket is consistent with Policy H1, Policy H4 and the London Plan. It seeks to promote the mixed use development of the site for self-contained homes, employment, retail and leisure uses. This includes an indicative housing capacity of 644 homes in accordance with the approved planning permission for this site and consistent with the aspiration of Policy H1 to maximise housing supply.
- 41.2 The 'context section' of the allocation makes reference to the expectation for the supply of housing (including the on-site affordable housing) to be maintained or increased should any amendments come forward. This section does not form part of the policy requirements, but is consistent with Policy H1 Part B. 5 that seeks to resist the loss of permanent housing secured through a current planning application, unless it can be demonstrated that the site no longer has a realistic prospect of timely development for the identified form of permanent housing. It is also consistent with Part C of Policy H4 which states that "We will seek to ensure that where development sites are split, additional proposals are brought forward on the same site, or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution is comprehensively assessed for all the proposals together. The Council will seek to use planning obligations to ensure that all parts or phases of split or related sites make an appropriate affordable housing contribution."
- 41.3 Furthermore, the approach taken is also considered to be consistent with London Plan Policy H5 Threshold approach to applications, which sets out specific criteria to deal with scheme amendments – including Section 73 applications and deeds of variations.
- 41.4 This site is currently subject to a planning appeal (ref APP/X5210/W/25/3369926) in relation to the affordable housing provision on the site. This has not been determined to date.

**42. Is the policy requirement that identifies an appropriate height of 12-53m on the site justified and effective?**

- 42.1 The allocation has been informed by the findings of the Camden Building Heights Study (EB34) which was carried out in accordance with the London Plan and relevant London Plan Guidance. The Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m – 53 m considered the potentially appropriate height range.
- 42.2 The policy notes, however, that the Council has granted planning permission for a development of up to 56m (prior to the publication of the Camden Building Heights Study). That decision was based on an assessment of the impacts and benefits of that specific development. It should not be assumed that the permitted height would necessarily be appropriate for any subsequent development.
- 42.3 The policy makes clear that any future application would be considered on its merits and would be assessed against Policy D2 Tall Buildings and other relevant policies.
- 42.4 The approach is therefore considered to be justified and effective.

**43. Is reference to the Camden Good Yard Planning Framework Supplementary Planning Document (SPD) justified and effective?**

- 43.1 The Council considers the reference to the Camden Goods Yard SPD (LD48) to be appropriate and justified and effective. It is the planning framework covering this site which was prepared and adopted by the Council as supplementary planning guidance. It is therefore a material consideration in decision making. It is reasonable and appropriate for the Local Plan to make reference to it.
- 43.2 The approach is consistent with that taken for other allocations, which also refer to relevant planning framework supplementary planning documents.

**44. Does part 13 of the policy take a justified approach to access to bus services?**

- 44.1 It is considered that criterion 13 of the policy takes a justified approach to access to bus services. Criterion 13 seeks to deliver a sustainable long-term solution to minimise the environmental impacts of bus movements on residential amenity and the public realm in the Camden Goods Yard area, whilst ensuring that accessibility to bus services is maintained. It expects applicants to engage with neighbouring landowners and relevant stakeholders (namely Transport for London) to establish the optimal location for bus stands to meet the need of different users. It is considered that this provides appropriate flexibility for the parties involved to agree a suitable solution to this issue through the planning application process.
- 44.2 The site is part of the area covered by the Council's adopted Camden Goods Yard Planning Framework (LD48). Maintaining and improving access to public transport

whilst minimising the environmental impacts of bus movements on residential amenity and the public realm is a key objective of the adopted Framework. Delivery of this requires coordination with adjacent landowners and stakeholders in order to minimise impact on services.

- 44.3 Any application would also be assessed against Local Plan Policy T3 Public Transport, which sets out the Council's approach to public transport contributions.
- 44.4 The Statement of Common Ground with Transport for London (SD31) sets out the parties' position in relation to this matter.

### **Site Allocation C8**

#### **45. Are the proposed uses for the site justified?**

- 45.1 The proposed uses for Site Allocations C8 Former Morrisons petrol filling station are considered to be justified.
- 45.2 The site is allocated to deliver permanent self-contained homes, employment (offices) retail, food and drink. The allocated uses reflect the planning permission granted for the site (2020/3646/P) and the Council's priority for self-contained homes to help meet the borough's housing need, and are therefore considered appropriate.
- 45.3 Further information on the factors considered when determining the proposed mix of allocated uses for the site allocations is set out in Section 8 of the Site Selection and Allocation Topic Paper (TP03).

### **Site allocation C10**

#### **46. Does the policy provide adequate protection to the Grade II\* Roundhouse?**

- 46.1 Site Allocation C10 Juniper Crescent is considered to provide suitable protection for the listed Roundhouse. Criterion 9 states that development must be designed to conserve or enhance the significance of the Grade II\* Roundhouse and its setting, and respect locally important views in accordance with Policy D5 (Historic Environment). The planning application for the re-development of this site has recently been approved by the Council's planning committee, subject to the agreement of the section 106 and referral to the Mayor. Here it should be noted that the heritage assessment of the scheme found that impact on the roundhouse was "Low level of less than substantial harm".
- 46.2 The Statement of Common Ground that the Council has agreed with Historic England sets out the parties' position in relation to this matter (see ED03m).

### **Site allocation C11**

#### **47. Does the policy take a justified approach to bus services?**

- 47.1 It is considered that Site Allocation Network Rail land at Juniper Crescent takes a justified approach to bus services. Criterion 8 states that development must consider whether the site could help address the issues identified in respect of bus operations on adjacent sites (Morrisons supermarket and Juniper Crescent), stating that an operational area within the site could, for example, support a bus turning area at the end of the existing access road. It is considered that this provides appropriate flexibility for the parties involved to agree a suitable solution to this issue through the planning application process.
- 47.2 The site is part of the Camden Goods Yard Planning Framework area. Maintaining and improving access to public transport whilst minimising the environmental impacts of bus movements on residential amenity and the public realm is a key objective of the adopted Camden Good Yard Planning Framework (LD48). Delivery of this requires coordination between relevant landowners and stakeholders in order to minimise impact on services. Any application would also be assessed against Local Plan Policy T3 Public Transport which sets out the Plan's approach to public transport contributions.
- 47.3 The Statement of Common Ground with Transport for London (ED03I) sets out both parties' position in relation to this.

### **Site allocation C12**

#### **48. Does the policy take a justified and effective approach to bus services?**

- 48.1 Site Allocation C12 Gilbeys Yard does not make specific reference to bus services. This reflects the fact that neither the Council nor TFL have identified this as a site where new or enhanced bus infrastructure is required.

### **Site allocation C14**

#### **49. Should the policy acknowledge and address the implications of the site's location adjacent to Conservation Areas?**

- 49.1 Site allocation C14 Hawkridge House, Warden Road is not located adjacent to a Conservation Area, as shown on the map below. It is not therefore appropriate to include a reference or address this.



### Site allocation C16

#### 50. Is the indicative capacity of 197 student units on this site justified?

- 50.1 The indicative capacity for student units on Site C16 Shirley House is considered to be justified. The approach taken to estimating the indicative housing capacity for this site is set out in Sections 9 and 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S of TP03.
- 50.2 The site promoter has indicated there is potential to retain and extend the existing buildings, and the allocated capacity has been identified on this basis, in line with Policy CC2 Prioritising the retention of existing buildings.
- 50.3 The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

### Site allocation C17

#### 51. Is the policy sufficiently flexible in terms of the types of uses permitted on the site?

- 51.1 Site C17 Camden Town over station development is allocated to deliver permanent self-contained homes and student accommodation, employment uses (including maker spaces, creative industries and offices), retail, and food and drink uses (on

the ground level). The Council has also proposed a main modification to include station infrastructure in the allocated uses (see Schedule of Main Modifications (SD51) reference MM39).

51.2 The allocated uses reflect the Council's priorities for the site and seek to optimise residential use to contribute towards meeting Camden's need for housing. Given a number of uses are allocated on this site, it is considered that the approach is sufficiently flexible. If alternative uses were to come forward on this site, then these would be considered against the allocation and other relevant policies in the Plan.

**52. Is the requirement to provide step free access in clause 15 of the policy justified?**

52.1 The provision of step-free access at Camden Town Underground Station is considered appropriate and justified as this reflects an objective of the Council and the Mayor of London / TfL. The Statement of Common Ground between the Council and TFL sets out an agreed position in relation to this (see ED03I).

52.2 Public transport should be accessible to all. It is considered reasonable and appropriate for the development at Camden Town station to incorporate step-free access.

52.3 TFL's comments on the draft Local Plan at Regulation 18 stage welcome the inclusion of reference to the delivery of step-free access at Camden Town station.

52.4 In their comments on the Proposed Submission Local Plan at Regulation 19 stage TFL state that "we encourage the Council to consider how to make most efficient use of land as part of this site to help deliver the Camden Town station capacity upgrade and step-free access.... While we acknowledge the desire to provide step-free access and capacity improvements to Kentish Town and Chalk Farm stations, we encourage the Council to prioritise Camden Town station for developer contributions." (It should be noted that the site boundary of the allocation was amended prior to the publication of the Proposed Submission Plan to incorporate additional land in TfL's ownership to help facilitate development.)

52.5 The allocation is consistent with Policy T3 Public Transport Part B, which states that "Contributions may also be sought towards the improvement of other forms of public transport in major developments and the provision of improved public transport infrastructure including bus shelters and passenger information, and step free access and capacity improvements at stations in the borough."

**53. Does the policy include support for tall buildings in this location?**

- 53.1 The site is not identified as a location where a tall building may be an appropriate form of development. This reflects the findings of the Camden Building Heights Study (EB34) which found that a larger building up to 30m could be appropriate, subject to comprehensive over station development. Here it should be noted that buildings need to be over 30m to be considered a tall building in accordance with the Study and Policy D2 of the Local Plan.
- 53.2 Any proposal for a tall building on this site would be assessed against Local Plan Policy D2 Tall Buildings and other relevant policies.

### **Site allocation C21**

**54. Is the policy sufficiently flexible in terms of the types of uses permitted on the site?**

- 54.1 Site Allocation C21 Grand Union House is considered sufficiently flexible in terms of the types of uses allocated on this site. The allocated uses are employment (offices), retail (ground floor) and permanent self-contained homes. The allocated uses reflect that the Council has resolved to grant planning permission (2021/0911/P) on the site for 4,000 sq m additional employment space and six homes.
- 54.2 The Council considers that the allocated uses are the most appropriate uses for this site, given its location and the acute need for housing in Camden. Furthermore, we do not consider that there is a need for any further flexibility in the allocated uses as any proposals for other uses will be assessed against the other policies in the Plan.

**55. Should the policy support hotel use and student accommodation on the site?**

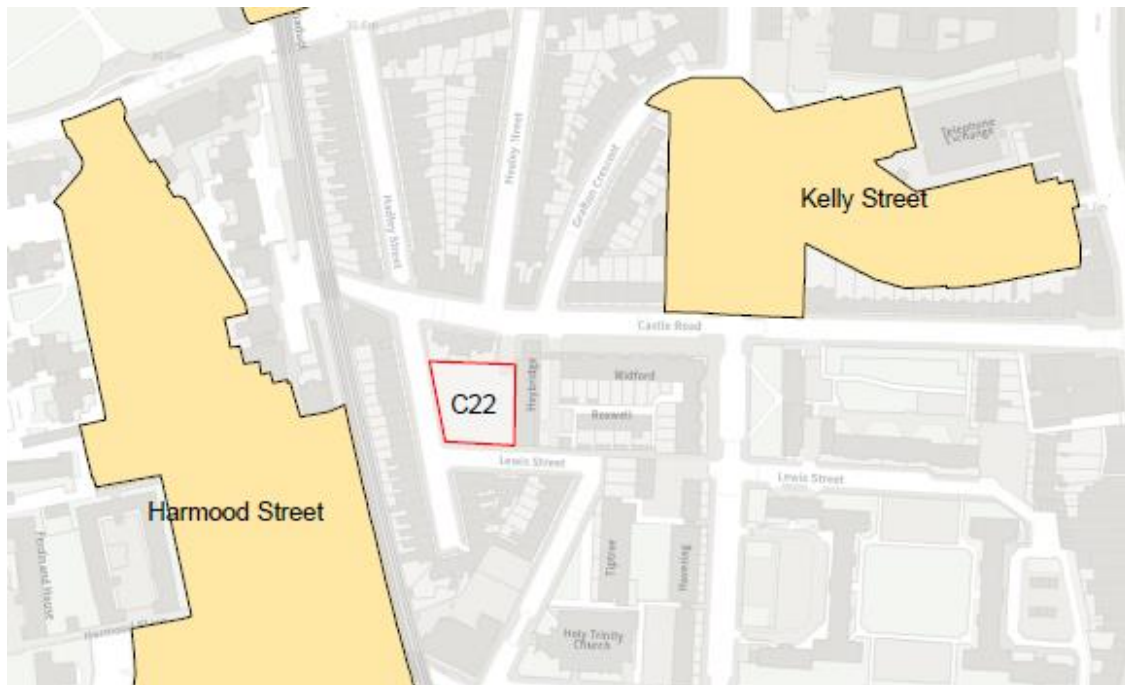
- 55.1 The Council does not consider that the policy should support a hotel or student use on this site. Permanent self-contained housing is the priority use of the Plan. The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Self-contained housing is prioritised relative to other forms of housing because it offers the greatest flexibility to accommodate a wide variety of household types, and the best prospect of delivering affordable housing in the context of very high affordable housing need from households with very limited incomes.
- 55.2 The site has a resolution to grant planning permission for a mixed use scheme including commercial and self-contained residential accommodation. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to plan to meet identified housing needs, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. The approach is consistent with Policy H1 (Maximising

Housing Supply) which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing. Any subsequent application would be considered against all policies in the Local Plan and be determined on its merits.

### Site allocation C22

#### 56. Should the policy acknowledge and address the implications of the site's location adjacent to Conservation Areas?

56.1 Site allocation C22 Heybridge Garages is not located adjacent to a Conservation Area, as shown on the map below. It is not therefore appropriate to include a reference or address this.



### Site allocation C23

#### 57. Is the indicative capacity of 148 dwellings on the site justified?

57.1 The indicative capacity of Site C23 Bacton Low Rise is considered to be justified. This site has planning permission to deliver 314 homes in total (2012/6338/P dated 25/04/2013 (as amended by planning permissions 2014/3633/P, 2015/1189/P and 2016/5358/P). Phase 1 delivered 166 new and replacement homes. The capacity of 148 reflects the net increase of homes still to be delivered on site and does not include the replacement homes. A main modification is proposed in the Schedule of main modifications (SD51) reference MM43 to clarify this.

57.2 The Local Plan identifies in Paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 also states that a larger number of homes than the indicative

capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

### **Site allocation C27**

#### **58. Is allocation of the site for Gypsy and Traveller use justified?**

- 58.1 The allocation of Site C27 Land adjacent to Constable House is considered to be justified.
- 58.2 Councils have a statutory obligation to plan for the needs of Gypsies and Travellers. The Local Plan identifies that the overall need for Gypsy and Traveller accommodation in Camden over the Plan period to 2041 is 19 additional pitches. This figure includes the four existing pitches that were provided in Camden at the time the assessment was undertaken (see Policy H11).
- 58.3 To inform the approach taken in the Plan to meeting the accommodation needs of Gypsies and Travellers, the Council commissioned Aecom to undertake a Gypsy and Traveller Site Identification Study (EB12 and EB13) in 2023. The purpose of this work was to identify a shortlist of Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.
- 58.4 The Study identified a shortlist of 18 sites, including the land adjacent to Constable House, that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council (with some sites containing more than one parcel of land).
- 58.5 Following this, Council officers undertook a more detailed availability and suitability assessment of the shortlisted sites, including this site, in discussion with other Council teams. As part of the suitability assessment of the sites, officers visited the remaining sites to assess their suitability for the provision of Gypsy and Traveller accommodation.
- 58.6 The findings of this work are set out in Chapter 6 of the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP04) and relevant Appendices.
- 58.7 On the basis of this further assessment work and the comments made through the consultation on the Gypsy and Traveller Site Identification Study (see answer to qn 59 below) and those made by other Council services, it was considered that the land adjacent to Constable House was suitable for allocation to help meet the accommodation needs of Gypsies and Travellers.
- 58.8 The allocation of this site to provide 2 Traveller pitches will help to meet the identified need for Gypsy and Traveller accommodation in Camden, in line with national policy, and is therefore considered justified.

58.9 Further information about the Council's approach to meeting the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Camden is set out in Topic Paper TP04.

**59. What consultation took place on the proposed allocation of the site and was it in line with the requirements of the Statement of Community Involvement and the Regulations?**

59.1 To inform the approach taken in the Plan to meeting the accommodation needs of Gypsies and Travellers, the Council commissioned Aecom to undertake a Gypsy and Traveller Site Identification Study (EB12 and EB13) in 2023. The purpose of this work was to identify a shortlist of Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.

59.2 The Study identified a shortlist of 18 sites, including the land adjacent to Constable House, that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council (with some sites containing more than one parcel of land).

59.3 The Gypsy and Traveller Site Identification Study was published for comment on the Council's website from the 17 December 2024 to the 29 January 2025. As part of this engagement, the Council wrote to the occupiers of the two existing Gypsy and Traveller sites in Camden to seek their views. Officers also met with the organisation London Gypsies and Travellers, who offered to liaise with the Gypsy and Traveller community in Camden on the Council's behalf. 17 comments were received as part of the consultation.

59.4 A summary of the main issues raised through the consultation is set out in paragraph 6.11 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04. The comments received as part of the consultation were taken into consideration as part of the further assessment of the sites.

59.5 The land adjacent to Constable House, Adelaide Road, was then subsequently allocated for Gypsy and Traveller use in the Proposed Submission Draft Local Plan. This was published for consultation for a period of 8 weeks from 1 May to 27 June 2025, to enable residents, businesses, community groups, landowners and other key stakeholders to share their views on the soundness of the Plan.

59.6 The Plan was available to view online on the planning pages of the Council's website, and on 'we are Camden', the Council's consultation hub. Responses were invited to be made using the response form provided on our website and by email and letter.

59.7 A hard copy of the Local Plan Proposed Submission Draft was also available to view at the following Camden libraries: Highgate Library, Holborn Library, Kentish Town Library, Pancras Square Library and West Hampstead Library and this was advertised on our website and on the promotional material we sent out.

59.8 The consultation on the Local Plan Proposed Submission Draft was also widely advertised through the following channels:

- An email sent to our consultation database (1154 contacts), neighbourhood forums and Members. We also asked other services to email their contacts;
- We are Camden consultation page;
- Planning policy webpages and a news article on the Council's website;
- The Council's social media platforms, including Facebook and Twitter;
- Posters sent to libraries and community centres to display;
- A press release was sent to local newspapers, which resulted in a number of news articles;
- An advert in the Ham and High and Camden New Journal;
- A short article about the engagement included in the business newsletter, VAC newsletter, libraries newsletter, friends of Camden's parks newsletter; and climate action newsletter; and an
- Article in our Planning Policy Newsletter.

59.9 The Council considers that the engagement undertaken in relation to this site is in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the procedures set out in Council's Statement of Community Involvement (SD12), particularly –

- Table 1 – stages in the preparation of a local plan which sets out how we will consult on the publication and submission version of the Plan;
- Paragraphs 3.7 – 3.13 which set out who we will consult when we are preparing our planning policies; and
- Table 3 – ways of involving the community in preparing planning policy documents, which sets out different methods that may be used to involve the community and stakeholders in the production of planning policy documents; and
- Paragraphs 3.16 – 3.17 which set out how we will use the results of consultation and engagement.

Further information on the engagement the Council has undertaken to inform the preparation of the Local Plan is set out in the Regulation 22 Statement of Consultation (Part 1 - SD26).

## **60. What is the status of the existing open space on the site and has the implications of any loss been assessed?**

60.1 The allocation relates to a self-contained area of concrete hardstanding on the land adjacent to Constable House, Adelaide Road. This was used as a basketball court in the past, but has not been in use for many years, and is currently locked.

Furthermore, the area of the site allocation is not on or adjacent to a designated open space, as shown on the Local Plan Policies Map (SD10). The development of this site to provide Gypsy and Traveller accommodation will therefore not result in the loss of an existing open space.

**61. How will the site be accessed and what are the views of the Highways Authority?**

- 61.1 It is envisaged that the site will be accessed from Eton College Road, as illustrated in the indicative site layouts in Appendix 2 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04.
- 61.2 The Council's Highways Team have commented that access to the site should be achievable, with their preferred point of access being the one shown on the first indicative site layout drawing in Appendix 2 of TP04 (ie. slightly higher up Eton College Road).
- 61.3 Any planning application on this site would be accompanied by detailed access plans, and issues relating to access would be considered as part of the planning application process.

**62. What flood risk is associated with the site and has any impacts been assessed?**

- 62.1 Camden is within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough.
- 62.2 The Sequential Test of the Site Allocations (EB22) identifies that this site is located adjacent to a previously flooded street (Adelaide Road). The majority of the site is identified as being at low risk of surface water flooding, with 35% of the site identified at medium/high risk of surface water flooding (EA Surface Water Flood Risk Map).
- 62.3 In accordance with Local Plan Policy CC10 Flood risk, a site specific flood risk assessment would be required as part of any planning application on this site. The Council considers that any flood risk can be mitigated through the use of sustainable drainage systems.
- 62.4 That the Environment Agency commented in their response to the consultation on the draft Local Plan that "All site allocations are within Flood Zone 1 and we therefore have no comments to make on flood risk." (see the Statement of the Common Ground with the Environment Agency (EB03n)).

**63. Has the environmental impact of the allocation been assessed and if so, what were the findings?**

63.1 As part of the suitability assessment of this site environmental constraints were assessed, in terms of air quality and noise. Further information on this is set out in Section 6 and Appendix 4 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04.

63.2 In addition to this, the Sustainability Appraisal of the Plan (SD03) evaluated the environmental effects of the policies and site allocations in the Plan, in accordance with planning legislation and guidance. The SA did not identify that this site would have an environmental impact.

**64. Has the impact on living conditions been assessed in terms of overlooking and privacy for both new and existing inhabitants? Can any impacts be mitigated?**

64.1 Impact on living conditions (amenity) has been assessed in terms of overlooking and privacy for both new and existing inhabitants as part of the suitability assessment of this site. Further information on this is set out in Section 6 and Appendix 4 of the Gypsy and Traveller and Travelling Showpeople Topic Paper TP04.

64.2 The site comprises a self-contained area of hardstanding. The area of hardstanding sits at a lower level to the rest of the site and is well screened due to existing trees and vegetation, with potential for the trees / vegetation and level of screening to be enhanced. Given this, it is considered that the site will afford residents an appropriate degree of privacy and that any potential for overlooking can be mitigated. It should also be noted that Policy A1 Protecting amenity, which covers privacy and overlooking, would apply to any development scheme brought forward on this site.

**Modifications:**

**65. Are any modifications required to site allocations in Central Camden for soundness?**

65.1 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.

65.2 The Council has proposed modifications to Site Allocations C2, C3, C4, C5, C7, C8, C9, C10, C12, C13, C15, C16, C17, C18, C21 and C23. These are set out in SD51 Schedule of main modifications reference MM22 – MM43.

## **Issue 4: West Camden**

**Whether the proposals for West Camden are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.**

### **Questions:**

#### **With reference to site allocation W2**

**66. Is the requirement in criterion 2 of the policy “The applicant will also be required to explore opportunities to deliver provision for older people, or other people with care or support requirements, as part of the overall affordable housing provision” justified?**

66.1 It is considered justified to seek a proportion of housing to meet the specific needs of these groups on Site W2 O2 Centre, car park, car showrooms and 14 Blackburn Road, given that this is a large site and key area of growth in the borough. This is in accordance with Local Plan Policy H8.

66.2 Policy H8 Housing for older people, homeless people and other people with care or support requirements states that “in accordance with Policy H4 (Maximising the supply of affordable housing), the Council may seek affordable housing to meet the specific needs of older people, or other people with care or support requirements, as a proportion of the additional affordable housing provision from the largest developments (typically those involving 100 homes or more) (Part D)”.

66.3 It goes on to state that “in accordance with Policy H6 (Housing choice and mix), we may also support the inclusion of housing to meet the specific needs of older people, homeless people or other people with care or support requirements, where housing is proposed as Part of a development with a site area of 0.5 ha or greater and the specialised housing would be consistent with the criteria in Part F of this policy (Part E).”

**67. Is the site plan boundary correct? Are amendments required for clarity?**

67.1 The site plan boundary for this site is considered to be correct, and no amendments are considered necessary for clarity. The boundary reflects the Council’s understanding of the extent of the development opportunity at this location.

67.2 The site boundary reflects the extent of land identified in the Site Allocations Plan 2013, call for sites 2018, the London SHLAA, and the planning application approved for this site (2022/0528/P).

67.3 A consultation response was received at Regulation 19 stage in relation to Figures 14 and 15 in the submitted Plan and the intersection between this site and the town

centre boundary (Responder ID 498 comment 7). However, the Council responded to confirm that these figures are for illustrative purposes only and the designated town centre boundaries are shown on the Policies Map (SD10), along with site allocation boundaries.

### **Modifications**

**68. Are any modifications required to site allocations in West Camden for soundness?**

68.1 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.

68.2 The Council has proposed modifications to Site Allocations W2 and W13. These are set out in SD51 Schedule of main modifications reference MM44 – MM45.

### **Issue 5: North Camden**

**Whether the proposals for North Camden are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.**

#### **Questions:**

**69. With reference to site allocations:**

**Site allocation N2**

**70. Is the identified site capacity justified?**

70.1 The identified capacity for Site Allocation N2 Former Mansfield Bowling Club is considered to be justified.

70.2 The approach taken to estimating the indicative housing capacity for this site is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03).

70.3 The indicative housing capacity is 23 additional homes, which reflects the planning permission granted on the site.

70.4 The Local Plan identifies in Paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 also states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

**71. Is the policy sufficiently flexible in terms of the types of uses permitted on the site?**

- 71.1 The policy is considered sufficiently flexible in terms of the types of uses allocated on this site. The allocated uses are permanent self-contained homes / or specialist care home, open space and sports facilities.
- 71.2 The allocation seeks to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, open space and sports provision, taking into account the site's location in a residential neighbourhood in a conservation area, partial open space designation and former sports use.
- 71.3 The proposed uses reflect that a planning permission was granted on appeal in Jan 2017 for 21 new dwellings, a new public space, enhanced tennis facilities and an ancillary sports provision. This permission was later varied to include two additional dwellings.
- 71.4 A subsequent planning application for a residential care home, open space and three tennis courts has also been submitted for this site. This is reflected in both the proposed allocated uses for the site and in criterion 1 of the policy.
- 71.5 The approach taken to allocated uses in the policy is also consistent with Policy H1 Maximising Housing Supply which seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Council's satisfaction that the site is no longer developable for housing.
- 71.6 Furthermore, proposals for other uses will be assessed against the policies in the Plan as a whole and therefore the Council does not consider there to be a need for any further flexibility in the allocated uses on this site.

**Site allocation N3**

**72. Is the identified site capacity justified?**

- 72.1 The site capacity is considered to be justified. The approach taken to calculating indicative housing capacity is set out in Section 9 of the Site Selection and Allocation Topic Paper (TP03). The capacity for this site is based on a design-led assessment, as set out in Section 10, with site specific justifications identified in Appendix S.
- 72.2 Specifically for this site, the capacity is based on extension of existing buildings with an element of infill new build. A scenario involving demolition was not tested given the site's location within a Conservation Area and the fact that Queen Mary House is

identified as a building of historical significance. Any scheme proposing the substantial demolition of the existing buildings would need to demonstrate compliance with Policy CC2 Retention of Existing Buildings. There are also a number of existing trees on the site.

72.3 The Submission Draft Local Plan identifies in paragraph 1.36 that all site capacities are indicative. Paragraph 1.40 states that a larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.

**73. Is retention of the original Queen Mary's House building, in criterion 1, justified?**

73.1 Queen Mary's House was built in the 1920's and is considered to be of historical significance. The site is also located within Hampstead Conservation Area. Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that area. The effect of this section is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas. The approach is therefore consistent with national policy, Local Plan Policy CC2 Prioritising the retention of existing buildings and Policy D5 Historic environment, and is therefore considered justified.

**Modifications**

**74. Are any modifications required to site allocations in North Camden for soundness?**

74.1 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.

74.2 The Council has proposed modifications to Site Allocations N2 and N3. These are set out in SD51 Schedule of main modifications reference MM46 – MM47.

**Issue 6: Site Allocation and Area Based Policies Monitoring**

**Question:**

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

- 75.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.
- 75.2 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.
- 75.3 The Council will monitor the delivery of the site allocations in the Plan as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of sites that are key to the delivery of the spatial strategy, the Council will consider whether any policy adjustments or an early review is appropriate.