

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

Issue 1: Site Allocations (West Camden)

Whether the preferred site allocations and area based policies are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.

Site Allocation W2 O2 Centre, car park, car showrooms and 14 Blackburn Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation W2 was identified through the Site Allocation Plan 2013 (existing site allocation), the London SHLAA 2017 and the 2018 call for sites.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area and identifies this site as being central to this. It notes that it has the potential to become a vibrant and diverse new neighbourhood that integrates into the wider area and delivers a significant increase in the number of permanent self-contained homes; town centre uses including retail and leisure; health and community facilities; employment floorspace; and open space.

c. How the boundaries and extent of the site have been defined and justified

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

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, town centre, community, health centre, employment uses and open space.

The site comprises the O2 Centre (retail and leisure uses), associated car parking, a retail warehouse, two car showrooms and a builder's merchant. With the O2 Centre, car park and Homebase element of the site falling within the designated Finchley Road / Swiss Cottage Town Centre.

The site is identified in the Camden Local Plan 2017 as a growth area providing a significant opportunity to deliver a mix of uses. Objectives for the site are also set out in the Council's adopted West End Lane to Finchley Road Supplementary Planning Document (2021). The Fortune Green and West Hampstead Neighbourhood Plan identifies most of the site as being part of the West Hampstead Growth Area and a key potential development site.

The allocation seeks to create a vibrant and sustainable new mixed-use development providing a mix of; town centre, community, health centre, employment uses and open space, alongside a substantial number of homes, that builds on the distinctive community and character of the Fortune Green and West Hampstead Neighbourhood area and makes a significant contribution to meeting identified needs.

The allocated uses reflect the planning permission that was granted for redevelopment of the whole site.

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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for this site is 1800 additional homes. This reflects the planning permissions granted for the site. No estimated floorspace for town centre, retail and leisure, community, health and employment use is included in the allocation. However given the sites partial location within a town centre and the existing uses on the site, it is considered justified to seek these uses here.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy W2 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Site is nearby the West Hampstead Conservation Area to the south, Fitzjohns Netherhall Conservation Area to the east and West End Green Conservation Area to the north. Policy D5 Historic environment sets out the Councils approach to conserving the historic environment, and applicants would be expected to have due regard to this policy.
- Site is adjacent to a Site of Importance for Nature Conservation (SINC). Criterion 13 states that development must enhance biodiversity on-site, contribute to the enhancement of the adjacent Site of Nature Conservation along the railway lines and deliver urban greening measures on the site in accordance with Policy NE2 (Biodiversity). This should help to mitigate any impact on the SINC.

- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy W2 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.
- Water supply. Early liaison with Thames Water is required to investigate whether the existing water supply capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.

In addition to the above criteria Policy W2 also sets out other site specific requirements relating to design; housing provision; comprehensive and co-ordinated development; employment floorspace; town centre, leisure and community uses; car parking; active travel; public realm and open space provision; tall buildings; access arrangements; walking, cycling and public transport improvements; local energy generation; SuDs; servicing; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy W2 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

The Camden Building Heights Study (EB34) has identified this site as a location where tall buildings may be an appropriate form of development, with 9m - 54m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies. The Council has granted planning permission for a development ranging in height from 33 - 61m. That decision was based on an assessment of the impacts and benefits of the specific development proposal, and it should not be assumed that the permitted heights would necessarily be appropriate for any subsequent development.

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation W2 is located near South Hampstead and Fitzjohns Netherhall Conservation Areas. There are locally listed buildings adjacent to the site on Finchley Road.

This site has planning permission. Given this, there is no in principle issue with the scale of development proposed in relation to the historic environment. Any future development proposals will however be assessed against the allocation and all relevant Local Plan policies including D5 (Historic Environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in three phases with development commencing in 2028/2029 and completing in 2040/2041.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required. The site allocation states that development must:

- 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;
- deliver a strong, convenient, direct, safe and accessible east-west route linking Finchley Road with West End Lane, including substantial improvements to the western end of Blackburn Road cul-de-sac;
- be supported by a Bus Infrastructure Plan to deliver improvements to bus stop facilities both within, and in the vicinity of, the site;
- incorporate pedestrian, cycling and environmental improvements to ensure the development is fully integrated with, and accessible to, the wider area;
- improve the Blackburn Road and West End Lane junction; and

¹ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

- provide an integrated servicing and vehicle access strategy that does not detrimentally impact the quality of walking and cycling routes, spaces and public realm.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site, reflects the Council's priorities for the site and reflects an existing planning consent.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in three phases with development commencing in 2028/2029 and completing in 2040/2041.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in multiple private ownerships.

Some land assembly may be required to deliver the later phases of development on the site.

There is an approved planning application for the phased delivery of the site, with phase 1 being a detailed approval and phase 2 and 3 outline approvals. Discussions are ongoing with the developer. It is therefore considered that there is developer interest in this site.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM44 and MM100.

Site Allocation W3 11 Blackburn Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation W3 was identified through a call for sites.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and employment in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land submitted through a call for sites and planning application 2015/3148/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and employment uses.

The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 Maximising housing supply. This is consistent with the objectives for this site set out in the Council's adopted West End Lane to Finchley Road Supplementary Planning Document (2021) and Fortune Green and West Hampstead Neighbourhood Plan.

Given the site is currently in employment use, it is considered justified to continue to provide employment uses here as part of a mixed use development.

The allocation reflects the fact that planning permission was granted for the mixed use development of the site incorporating residential and employment use.

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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for the site is 24 additional homes. The capacity for this site is based on a design-led assessment as set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

A scheme involving residential and employment uses was modelled. The site is occupied by two structures - a Victorian warehouse which is identified as being of high architectural quality and therefore worthy of retention; and another structure which is considered to be in poor condition, and therefore could potentially be

demolished. The capacity has therefore been assessed on the basis of a scheme involving the retention and extension of the Victorian warehouse, in addition to an element of new build development. No estimated floorspace for the employment use is included in the allocation. However given the site is currently in employment use, it is considered justified to continue to provide employment uses here as part of any re-development.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy W3 identifies one constraint in relation to this site. This is set out below along with the proposed approach to mitigation:

- The Victorian warehouse building is a non-designated heritage asset. Criterion 2 states that development must prioritise the retention of the Victorian warehouse building (which is a non-designated heritage asset), as it is considered to be of high architectural quality and worthy of retention.

In addition to the above criteria Policy W3 also sets out other site specific requirements relating to the delivery of development; design; demolition of existing buildings; employment floorspace; and safety and security.

It is considered that the site specific requirements set out in Policy W3 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan

has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on

allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

Site Allocation W3 is not located within or adjacent to a Conservation Area. There are no listed or locally listed buildings within or near the site. The Victorian warehouse is however identified as being a non-designated heritage asset.

This site has planning permission. Given this, there is no in principle issue with the scale of development proposed in relation to the historic environment. Any future development proposals will however be assessed against the allocation and all relevant Local Plan policies including D5 (Historic Environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2031/32.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans².

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

² That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site, reflects the Council's priorities for the site and reflects an existing planning consent.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2031/32.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

This site was put forward as part of a call for sites. It is therefore considered there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W4 13 Blackburn Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation W4 was identified through the Fortune Green and West Hampstead Neighbourhood Plan.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and employment in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2020/2940/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, and employment (office) uses.

The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with

Policy H1 Maximising housing supply. This is consistent with the objectives for this site set out in the Council's adopted West End Lane to Finchley Road Supplementary Planning Document (2021) and the Fortune Green and West Hampstead Neighbourhood Plan.

Given the site is currently in residential and employment use, it is considered justified to continue to provide both residential and employment uses here as part of a mixed use development.

The allocation reflects the fact that planning permission was granted for the mixed use development of the site incorporating residential and employment use.

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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for this site is 24 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the employment use is included in the allocation. However given the site is currently partly in employment use, it is considered justified to continue to provide employment uses here as part of any mixed use re-development.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

No constraints are identified in Site Allocation Policy W4 in relation to this site. The policy does however set out a number of site specific requirements relating to the delivery of development; design; demolition of existing buildings; housing provision; employment floorspace; and safety and security.

It is considered that the site specific requirements set out in Policy W4 are necessary to guide the development of the site. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). It should however be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough.

As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation W4 is not located within or adjacent to a Conservation Area. There are no listed or locally listed buildings within or near the site.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2027/28 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with

its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans³.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site, reflects the Council's priorities for the site and reflects an existing planning consent.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions have been secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

³ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2027/28 of the Plan period.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

Planning permission has recently been granted for the re-development of the site. It is therefore considered that there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W5 188 – 190 Iverson Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation W5 was identified through the London SHLAA 2017 and the 2018 call for sites.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and employment in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the London SHLAA and submitted through the call for sites 2018.

The policy makes it clear however that this site is allocated for the delivery of additional homes to the front of the site and that the re-development of the whole site is not envisaged.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, offices and light industrial uses.

The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 Maximising housing supply. This is consistent with the objectives for this site set out in the Fortune Green and West Hampstead Neighbourhood Plan

Given the site is currently in employment use, it is considered justified to continue to provide employment uses here as part of a mixed use re-development. Furthermore, if the whole site was to be taken forward for re-development then it would be considered appropriate to re-provide the existing employment floorspace on the site.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for the site is 17 additional homes. The capacity for this site is based on a design-led assessment, as set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

A scheme involving residential and employment uses was modelled. The capacity work only considered the front section of the site however, based on the information provided as part of the call for sites, which stated there was a need to retain the existing employment space to the rear of the site.

The allocated capacity is based on the retention and extension of one of the existing buildings, in addition to the demolition of the other building and an element of new build development. No estimated floorspace for the office and light industrial employment use is included in the allocation. However given the site is currently in employment use, it is considered justified to provide light industrial and office uses here as part of any mixed use re-development.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy W5 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- There is a designated open space which is also a Site of Importance for Nature Conservation (SINC) to the south of the site. Criterion 5 states that development must be designed and operated to ensure there is no direct, or indirect, impact on the designated open space (Medley Orchard) to the south of the site, which is also a Grade I Site of Importance for Nature Conservation (SINC) and Local Green Space. This should mitigate any impact on the designated areas.

- Trees. Criteria 7 states that development must seek to retain the mature street trees along the frontage of the site with Iverson Road in accordance with Policy NE3 (Tree Planting and Protection), which should mitigate any impact on the existing trees.

In addition to the above criteria Policy W5 also sets out other site specific requirements, relating to the provision of employment floorspace; the operation of the site for an employment use; access; housing; biodiversity; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy W5 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is either at very low or low risk of surface water flooding, with 3% of the site identified at medium/high risk of surface water flooding.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation W5 is not located within or adjacent to a Conservation Area. There are locally listed buildings near the site on Iverson Road. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 (Historic Environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2031/32.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁴.

⁴ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required. Furthermore, criteria 3 of the Policy states that development must maintain a suitable vehicular access and turning space to ensure that the operation of existing, or future, employment uses on the site are not compromised;

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2031/32.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. 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. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably 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.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

This site was put forward as part of a call for sites. It is therefore considered there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W6 Land to the rear of Meridian House 202 – 204 Finchley Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation W6 was identified through the 2018 call for sites.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land submitted to the Council as part of the call for sites in 2018.

The policy makes clear that the site is allocated for the delivery of additional housing on the land to the rear of the site, where the former caretaker's cottage is situated and that the re-development of other parts of the site are not envisaged.

No objections to the boundary or extent of the site were received during Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, light industrial and office uses.

The allocated uses reflect the fact that the site is adjacent to, but not within, Swiss Cottage / Finchley Road Town Centre.

The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 Maximising housing supply.

Given the site is currently in employment use, it is considered justified to continue to provide employment uses here as part of a mixed use development. Furthermore, if the whole site was to be taken forward for re-development then it would be considered appropriate to re-provide the existing employment floorspace on the site.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for the site is 15 additional homes. The capacity for this site is based on a design-led assessment, as set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

A scheme involving residential was modelled, focused on the rear part of the site, currently occupied by a derelict single storey caretakers' cottage. The structure is in poor condition; therefore it is considered unlikely that this building could be retained and re-used. As a result a scheme involving the demolition of this building was considered, as this would also make optimal use of the site.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy W6 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Site is adjacent to the Redington Froggnal Conservation Area, it is also next to a locally listed terrace. Policy D5 Historic environment sets out the Councils approach to conserving the historic environment, and applicants would be expected to have due regard to this policy.
- Trees. Criterion 3 states that development must ensure that the trees in the wooded copse within the site, which are subject to a TPO, are protected and sensitively integrated into any redevelopment. It also acknowledges that there are protected trees on adjacent sites that will need to be sensitively considered as part of any development, in accordance with Policy NE3 Tree planting and protection. This should help to mitigate any impact on the existing trees.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy W6 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.

In addition to the above criteria Policy W6 also sets out other site specific requirements, relating to the protection and re-provision of the existing employment uses on the site; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy W6 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site

Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies the site as being at low / very low risk of surface water flooding. The site is located on a previously flooded street and is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation W6 is located partly within the Redington Froggnal Conservation Area. There are locally listed buildings adjacent to the site on the Finchley Road. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 (Historic environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2032/33.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁵.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

⁵ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2032/33.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. 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. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably 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.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

The site was put forward as part of a call for sites. It is therefore considered that there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W7 Gondar Gardens Reservoir

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation W7 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in past planning applications for the site.

A significant proportion of the site is designated as open space and as a Site of Importance for Nature Conservation (SINC). The site is also identified in the Fortune Green and West Hampstead Neighbourhood Plan as a Local Green Space. These designations are shown on the Policies Map (SD10).

Whilst the boundary of the site allocation encompasses the whole of the site. The policy is clear that development must be focused on the un-designated area of the site, to protect the designated open space, SINC and Local Green Space.

The extent of the site is therefore considered to be justified.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and/ or specialist care home uses.

The allocation aims to make optimal use of the site by seeking to optimise residential

use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 Maximising housing supply and also with regard to Policy H8 Housing for older people, homeless people and other people with care or support requirements.

The allocated uses take into account the open space, SINC and Local Green Space designations on the site; and the fact the site is in a residential area. The proposed uses also reflect past planning permissions on the site.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

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

The indicative housing capacity for this site is 30 additional homes. This reflects the planning permission granted on appeal for the site (now lapsed).

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.

f. For employment proposals, the estimated floorspace and whether it is justified

N/A

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

N/A

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy W7 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Site is identified as a Site of Importance for Nature Conservation (SINC), designated open space and Local Green Space. Criteria 1 states that development must be focused on the un-designated area of the site, to protect the designated open space, SINC and Local Green Space; and criteria 3 states that development must ... ensure there is no harm to existing habitats and protected species on the site in accordance with Policy NE2 Biodiversity, to mitigate any impact on the designated area of the site.
- The reservoir is identified on the Council's Local List. Policy D5 (Historic environment) sets out the Council's approach to conserving the historic environment, and applicants would be expected to have due regard to this policy.

In addition to the above criteria Policy W7 also sets out other site specific requirements, relating to optimising residential provision on-site; enhancing the designated open space, SINC and Local Green Space; the protection of views across the site; design; and the retention of existing buildings.

It is considered that the site specific requirements set out in Policy W7 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and

are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies the site as being at low / very low risk of surface water flooding. The site is in the 21 – 40 category for sewer flooding incidents in this postcode area between 2013 – 2023.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation W7 is not located within or adjacent to a Conservation Area. There are locally listed features within the site and locally listed buildings adjacent on Gondar Gardens. Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 (Historic environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2035/36.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁶.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Highways access would need to be created to this site. This would be from Gondar Gardens. Here the policy states that development must be designed to establish clearly defined entrances on the Gondar Gardens street frontage to ensure the development actively contributes towards the street scene.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

⁶ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2035/36.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. 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. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably 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.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

The site has been subject to ongoing pre application discussions, and the owners confirmed their intention to develop the site. It is therefore considered there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W8 88 – 92 Kilburn High Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation W8 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and retail in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land submitted to the Regulation 18 consultation on the draft Local Plan.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and retail/ commercial uses.

The site is located in Kilburn Town Centre. The allocated uses reflect the existing use of the site and are consistent with neighbouring uses. The allocation also seeks to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for the site is 21 additional homes. The capacity for this site is based on a design-led assessment, as set out in Section 10 of the Site Selection and Allocation Topic Paper (TP03), with site specific justifications identified in Appendix S.

A scheme involving commercial and residential was modelled. The allocated capacity is based on the retention and extension of the existing buildings in line with Policy CC2 (Prioritising the retention of existing buildings). Given that the existing structure fronting Kilburn High Road includes three homes on the upper floors of the building, which are separately accessed and are not part of the site allocation, a scheme involving demolition was not considered.

No estimated floorspace for the commercial use is included in the allocation. However, given the site is situated in Kilburn Town Centre, it is considered justified to seek retail / commercial uses here.

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. without unacceptable harm to the amenity of occupiers and neighbours.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy W8 identifies one constraint in relation to this site. This is set out below along with the proposed approach to mitigation:

- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy W8 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.

In addition to the above criteria Policy W8 also sets out other site specific requirements, relating to the delivery of mixed use development; the co-location of uses; servicing; design; amenity and prioritising the retention of existing buildings.

It is considered that the site specific requirements set out in Policy W8 are necessary to guide the development of the site and mitigate the constraints identified. The requirements are also proportionate given the size of the site and the scale of development envisaged and justified by the evidence of constraints set out in the Site Selection and Allocation Topic Paper (TP03). Furthermore, the requirements are considered to appropriately address the technical constraints identified, along with other requirements in other policies in the Plan. Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and

are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

The Sequential Test of the Site Allocations (EB22) identifies that the majority of the site is identified as being at either very low or low risk of surface water flooding. The site is located in a Local Flood Risk Zone and on a previously flooded street. The site is in the 41 – 60 category for sewer flooding incidents in this postcode area between 2013 – 2023. Given this, a criterion has been added to the policy to state that a flood risk assessment will be required in accordance with Policy CC10 (Flood risk), to mitigate this. Recommendations in the Flood Risk Assessment will be secured by planning condition.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 Air Quality as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

Site Allocation W8 is not located within or adjacent to a Conservation Area. There is a locally listed building nearby on West End Lane. The site allocation is within an Archaeological Priority Area (Kilburn Priory and Settlement, Tier II). Development proposals will be assessed against the allocation and all relevant Local Plan policies including D5 (Historic environment).

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward between 2031/32.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁷.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

⁷ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

The infrastructure identified is considered necessary to support the delivery of the site and reflects the Council's priorities for the site.

This infrastructure required to support the delivery of this site will be secured through the planning application process and legal agreements.

It is not considered that the infrastructure identified is required prior to the commencement of development. Rather, it will be provided as part of the comprehensive development of the site, or, where necessary, infrastructure will be provided beyond the site. Here, appropriate provision or contributions will be secured through planning obligations. The Infrastructure Delivery Plan (EB43) provides further information on the funding and delivery of key infrastructure projects in the borough.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward between 2031/32.

As the infrastructure identified is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

Sites have been allocated in the Plan on the basis that they are considered to be available and deliverable. Further information on this is set out in the Site Selection and Allocation Topic Paper (TP03).

Planning proposals for allocated sites will be assessed against the allocation and all other relevant plan policies, and these were subject to viability appraisal. 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. It notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the Plan's policies contain sufficient flexibility to allow development to come forward viably 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.

The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

This site was put forward as part of a call for sites held to inform the preparation of the Plan. It is therefore considered that there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM90.

W9 Land at Midland Crescent Finchley Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02).

Site allocation W9 was identified through the London SHLAA 2017, the Fortune Green and West Hampstead Neighbourhood Plan and a review of planning applications.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and town centre uses in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in the London SHLAA and the planning application for the site (2014/5527P).

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes, student housing and town centre uses.

The site is partly within Finchley Road Town Centre. Given this, it is considered that the allocated uses are consistent with the character of the area and justified in accordance with Policy IE6. The allocation also aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing.

The allocated uses reflect the fact that planning permission was granted for a mixed use scheme comprising self-contained residential, student accommodation and town centre uses.

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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for this site is 9 additional homes and 60 student rooms. This reflects the planning permission granted for the site. No estimated floorspace for the town centre use is included in the allocation. However, given the allocation is partly within Finchley Road Town Centre, it is considered justified to seek town centres uses in this location, as part of a mixed use development scheme.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

Site Allocation Policy W9 identifies one constraint in relation to this site. This is set out below along with the proposed approach to mitigation:

- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy W9 states that a Flood Risk Assessment will be required in accordance with Policy CC10 (Flood risk) and that recommendations in the Flood Risk Assessment will be secured by planning condition, to mitigate any impact.

As this site has planning permission, no further site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Where relevant key considerations are identified in relation to this site it is considered that these are proportionate and justified and appropriately address any technical constraints on the site.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 (Air quality) as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning

application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2029/30 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁸.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No specific infrastructure is identified as being considered necessary to support the delivery of this site.

⁸ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and will be provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2029/30 of the Plan period.

As any infrastructure secured through the planning application process is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

There is an extant planning permission for the site, and the owners have confirmed through the Regulation 19 consultation on the Plan that they wish to take the site forward. It is therefore considered that there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W10 104A Finchley Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation W10 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and employment in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2022/3553/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and commercial uses.

The site is within Finchley Road Town Centre. Given this, it is considered that the allocated uses are consistent with the character of the area and justified in accordance with Policy IE2 and Policy IE6. Furthermore, given the location of the site, Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) applies. The allocation of this site to deliver self-contained homes as part of a mixed use development is therefore consistent with the approach set out in H2.

The allocation also reflects the fact that the Council has granted planning permission, subject to S106, for a mixed use scheme comprising residential and commercial uses.

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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for this site is 31 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the commercial use is included in the allocation. However, given the site is situated in Finchley Road Town Centre, it is considered justified to seek commercial uses here as part of the mixed use development of the site.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 (Air quality) as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2029/30 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans⁹.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

⁹ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No specific infrastructure is identified as being considered necessary to support the delivery of the site.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and will be provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2029/30 of the Plan period.

As any infrastructure secured through the planning application process is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has a resolution to grant planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

Planning permission has recently been granted to redevelop the site. It is therefore considered that there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W11 Abbey Co-op Housing Site, Emminster and Hinstock

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation W11 was identified through the 2018 call for sites and a review of planning applications.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and employment in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land submitted in the 2018 call for sites and planning application 2022/2542/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and flexible commercial uses.

The allocation supports the redevelopment of the existing Abbey Road housing estate and aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing. To support the creation of healthy and sustainable places, the site is also allocated to provide an element of commercial floorspace, in line with Policy DS1 Delivering healthy and sustainable development.

Phases 1 and 2 of the development are complete. The allocation therefore reflects the fact that planning permission was granted in March 2023 for phase 3 of the scheme, to deliver residential and flexible commercial uses.

The approach taken to allocated uses in the policy 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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for this site is 65 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the commercial use is included in the allocation. However, the allocation of this site to deliver a mix of uses is considered justified as it is in line with Policy DS1 (Delivering healthy and sustainable development).

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 (Air quality) as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is currently under construction and forecast to complete in 2025/2026. Given this, it has not been included in the housing trajectory.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No specific infrastructure is identified as being considered necessary to support the delivery of the site.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and has been provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is currently under construction and forecast to complete in 2025/2026. Given this, it has not been included in the housing trajectory.

As any infrastructure secured through the planning application process has been provided as part of the development of the site it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission and is under construction. The site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in Council ownership.

The Council is not aware that land assembly is required to take this site forward.

The development of this site is being taken forward by the Council's Community Investment Team. Planning permissions have been granted for the site and phased construction has begun and is nearly complete.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W12 100 Avenue Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation W12 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes town centre and community uses in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2014/1617/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes; ground floor town centre uses and a community use.

The allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing. Furthermore, given the allocation is within Finchley Road Town Centre, it is considered justified to seek town centres uses in this location, consistent with Policy IE6. The mix of uses allocated on this will also support the creation of healthy and sustainable places in line with Policy DS1 (Delivering healthy and sustainable development).

The allocation reflects the fact that planning permission was granted at appeal for the mixed use development of the site comprising residential, retail and community use.

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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for this site is 184 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the town centre or community use is included in the allocation. However, the allocation of this site to deliver town centre and community uses is considered justified as it is in line with Policy IE6 and Policy DS1.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

This site has planning permission. The key considerations in the policy note that this site has been identified as being a location where tall buildings may be an appropriate form of development. No further site specific requirements have been included in the policy however, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is identified as a location where tall buildings may be an appropriate form of development, with 12m - 63m considered the potentially appropriate height range. The policy notes however that planning permission was granted for a development up to 82m.

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land, we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 (Air quality) as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council's Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council's housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is expected to come forward in years 2027/28 to 2028/29 of the Plan period.

The Council has estimated the number of homes likely to come forward each year on the basis of information submitted with planning applications or submitted in responses to Local Plan consultations (including 'call for sites' exercises), along with its own assessments carried out as part of the preparation of the Submission Draft Local Plan and earlier proposed plans¹⁰.

The Council therefore considers that the expected timescales and rate of development in relation to the delivery of this site are realistic.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of

¹⁰ That is, the draft Camden Site Allocations Local Plan 2020 and the draft Camden Local Plan published in 2024 (which incorporated the content of the draft Site Allocations Local Plan)

additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No specific infrastructure is identified as being considered necessary to support the delivery of the site.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and will be provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is expected to come forward in years 2027/28 to 2028/29 of the Plan period.

As any infrastructure secured through the planning application process is not required to be delivered in advance of the site coming forward, it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

It is therefore considered that the assumptions relating to infrastructure dependencies and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission, and the site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

Planning permission has been granted for the development of this site and construction has commenced. Furthermore, the new owners of the site are undergoing pre application discussions to amend the approved scheme. It is therefore considered that there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.

Site Allocation W13 551 – 557 Finchley Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation W13 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and employment in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2020/5444/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and flexible commercial uses.

The site forms part of a small local parade of shops and businesses, all of which have commercial uses on the ground floor and residential above. It is therefore considered that the allocated uses are consistent with the character of the area.

Furthermore the allocation aims to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing.

The allocation reflects the fact that planning permission was granted for the mixed use development of the site comprising residential and flexible commercial use.

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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for this site is 15 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the commercial use is included in the allocation. However, the allocation of this site to deliver commercial uses as part of the mixed use development of the site is considered justified as it is in line with Policy DS1.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 (Air quality) as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is currently under construction and forecast to complete in 2025/2026. Given this, it has not been included in the housing trajectory.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No specific infrastructure is identified as being considered necessary to support the delivery of the site.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and has been provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is currently under construction and forecast to complete in 2025/2026. Given this, it has not been included in the housing trajectory.

As any infrastructure secured through the planning application process has been provided as part of the development of the site it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission and is under construction. The site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

The site has planning permission and construction is at an advanced stage, with completion expected by the end of April 2026. It is therefore considered that there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

The Council has proposed modifications to this policy. These are set out in the Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft (SD51) - modification reference MM45.

Site Allocation W14 317 Finchley Road

1. For each proposed development site, please set out:

a. The background to the site allocation and how it was identified

The process undertaken to identify and assess sites for allocation is set out in the Council's Site Selection and Allocation Topic Paper (TP03). Details on each site including existing planning permissions and designations is set out in the Context section of each site allocation in the Submission Draft Local Plan (SD02)

Site allocation W14 was identified through a review of planning applications.

b. How the site contributes to delivering the spatial strategy

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.

This site is in West Camden. Policy W1 West Camden sets out the Council's overarching strategy to guide the future development of this area. This site is allocated to deliver new homes and employment in accordance with Policy W1, contributing to the delivery of the spatial strategy for the area.

c. How the boundaries and extent of the site have been defined and justified

The boundary reflects the extent of land identified in planning application 2016/2910/P.

The boundary reflects the Council's understanding of the extent of the development opportunity at this location.

No objections to the boundary or extent of the site were received during the Regulation 19 consultation.

d. The uses to be permitted and how they are justified

The allocated uses are permanent self-contained homes and flexible commercial uses.

The site is within Finchley Road Town Centre. Given this, it is considered that the allocated uses are consistent with the character of the area and justified in accordance with Policy IE2 and Policy IE6. Furthermore, given the location of the site, Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) applies. The allocation of this site to deliver self-contained homes as part of a mixed use development is therefore considered to be consistent with the approach set out in H2.

The allocation reflects the fact that planning permission was granted for the mixed use development of this site to deliver permanent self contained homes and flexible commercial uses on ground and lower floors.

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.

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).

e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified

See the response to g. below.

f. For employment proposals, the estimated floorspace and whether it is justified

See the response to g. below.

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified

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

The indicative housing capacity for this site is 22 additional homes. This reflects the planning permission granted for the site. No estimated floorspace for the commercial use is included in the allocation. However, given the site is situated in Finchley Road Town Centre, it is considered justified to seek commercial uses here as part of a mixed use development.

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.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan

The constraints for each site allocation 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 individual allocations as necessary. Where measures are needed to mitigate any identified constraints, these are also identified in the site allocation policies.

The site allocation policies in the Plan have also been subject to sustainability appraisal (SA), to appraise the likely effects of the site allocation policies against the SA Framework (further information on this is set out in SD03 Sustainability Appraisal of the Camden Local Plan Proposed Submission Draft.)

As this site has planning permission, no site specific requirements have been included in the policy, as any technical constraints on this site would have been assessed as part of the planning application and mitigation agreed where necessary.

Here it should be noted that the Plan has been written to be read as a whole and all relevant Local Plan policies also apply to the site allocations.

j. How any site-specific recommendation on building heights is justified on terms of local context

This site is not identified as suitable for a tall building, reflecting the findings of the Camden Building Heights Study (EB34).

The Study was prepared in accordance with London Plan policy and guidance and included context analysis and consideration of specific sensitivities for each site/area, including townscape and character, heritage, topography, views and context heights.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

Flood risk on sites was considered as part of the Site Suitability Assessment (see TP03 Site Selection and Allocation Topic Paper) and the Sequential Test of the Site Allocations (EB22). All sites in Camden are within Flood Zone 1. Flooding from surface water and sewer surcharge pose the greatest risk of flooding in the borough. As all the site allocations are on previously developed land we do not consider that flood risk will impact on the capacity of sites. Where a potential flood risk has been shown to exist then this has been identified in the site allocation policy, and mitigation is proposed.

This site has planning permission. Any mitigation required in respect of flood risk has been secured through the planning application process.

The Council considers that a consistent approach to managing flood risk has been applied to all relevant site allocations in the Plan. It should also be noted 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)).

I. Is the approach of the Plan to air quality matters relating to planned growth sound?

The approach of the Plan to air quality matters relating to planned growth is considered sound. Local Plan Policy A3 (Air quality) requires submission of an Air Quality Assessment for certain types of development, including major planning applications. The assessment determines what mitigation measures are needed to protect future occupants and limit the impact of the development on local air quality.

Air quality matters were considered as part of the site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03). Where planning applications come forward on allocated sites, these will be assessed against the allocation and all relevant Local Plan policies including Policy A3 (Air quality) as appropriate.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met

Heritage matters were considered as part of the Site suitability assessment carried out for all sites considered for allocation, as set out in the Council’s Site Selection and Allocation Topic Paper (TP03).

This site has planning permission. Evidence that the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage has been met are outlined within the assessment of the planning application. Any mitigation required in respect of heritage will have been secured through the planning application process.

n. Evidence of the expected timescale and rate of development, and whether they are realistic

The Council’s housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan (see Figure 1). This site is currently under construction and forecast to complete in 2025/2026. Given this, it has not been included in the housing trajectory.

o. The highways implications of the site, including accesses and the effect on the highway network

The Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking; the provision of alternative, sustainable modes of travel; supporting improvements to and investment in public transport; and by prioritising the sustainable movement of people, goods, services and materials. Given this the site allocations in the Camden Local Plan Proposed Submission Draft should not give rise to significant levels of additional traffic. Highways implications are considered through transport assessments and statements at the planning application stage where necessary.

Development would be expected to be car free in accordance with Local Plan Policy T5 - Parking and car-free development. No additional highway access to the site is required.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes

The Site Allocation Infrastructure Requirements table - Appendix T (ED03t) identifies infrastructure requirements for each of the site allocations in the Plan.

No specific infrastructure is identified as being considered necessary to support the delivery of the site.

This site benefits from planning permission and the infrastructure required to support the delivery of this site has been secured through the planning application process and legal agreements and has been provided as part of the development of the site.

The housing trajectory and five year housing land supply note (SD14) sets out the anticipated timescales for the delivery of sites allocated in the Plan. This site is currently under construction and forecast to complete in 2025/2026. Given this, it has not been included in the housing trajectory.

As any infrastructure secured through the planning application process has been provided as part of the development of the site it is not considered that the delivery of the infrastructure requirements will impact on the timescales for the delivery of the site.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

This site has planning permission and is under construction. The site allocation policy reflects the permitted scheme. The site is therefore considered to be viable and developable at the scale of development expected within the plan period.

s. The situation with regards land ownership, land assembly and developer interest

The site is in private ownership.

The Council is not aware that land assembly is required to take this site forward.

The site has planning permission and construction is at an advanced stage, with completion expected by the end of April 2026. It is therefore considered that there is developer interest in the site.

t. Any modifications that are necessary for reasons of soundness

No modifications are proposed to this site allocation.