

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

Issue 1: Site Allocations (North 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 N2 Mansfield Bowling Club

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 N2 was identified through a past planning permission.

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 North Camden. Policy N1 North 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 infrastructure in accordance with Policy N1, 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 applications for the site.

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 / or specialist care home, open space and sports facilities.

The allocation seeks to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, open space and sports provision, taking into account the site's location in a residential neighbourhood in a conservation area, partial open space designation and former sports use. This site is also covered by the Dartmouth Park Neighbourhood Plan, which identifies it as a 'specific neighbourhood site' and designates part of it as a Local Green Space.

The proposed uses reflect that a planning permission was granted on appeal in January 2017 for 21 new dwellings, a new public space, enhanced tennis facilities and ancillary sports provision. This permission was later varied to include two additional dwellings (2018/1701/P). A subsequent planning application for a residential care home, open space and three tennis courts has also been submitted for this site. This is reflected in both the proposed allocated uses for the site and in criterion 1 of the policy.

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

Please see the response to g. below.

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

Please 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 23 additional homes. This reflects the planning permission granted on the site. No estimated floorspace for the sports facilities is included in the allocation. However, the allocation of the site for on-going sports use is considered justified given the need to protect existing sports facilities wherever possible in line with Policy SC3 and the evidence of need for tennis courts set out in the Open Space, Sport and Recreation Study 2014 (EB29).

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 N2 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Site is within the Dartmouth Park Conservation Area. 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.
- Part of the site is designated as private open space. Criteria 2 of site allocation policy N2 states that development must make provision for a new public open space, which should be provided in accordance with Policy SC4 (Open space), to mitigate the loss of the existing open space.
- On-site tennis courts. Criteria 2 of site allocation policy N2 states that development must make provision for enhanced tennis facilities and an ancillary sports pavilion on site in accordance with Policy SC3 (Social and community infrastructure), to mitigate the loss of the existing sports facilities in line with Policy SC3 the evidence of need for tennis courts set out in the Open Space, Sport and Recreation Study 2014 (EB29).
- Existing mature trees. Criteria 4 of site allocation policy N2 states that development must seek to protect existing trees on-site in accordance with Policy N3 (Tree Planting and Protection), to mitigate the impact of development on existing trees.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy N2 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.

- Roosting bats. Policy N2 states that a bat mitigation strategy will be required to mitigate the impact of the development on bats and that any application will be assessed against Policy NE1 (Natural environment) and Policy NE2 (Biodiversity).

In addition to the above criteria, Policy N2 also sets out other site specific requirements, namely criteria 1 (provision of a residential care home) and 3 (design). The site specific requirements in the policy also reflect recent planning applications on the site.

It is considered that the site specific requirements set out in Policy N2 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)).

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).

As set out in Site Allocation N2, the site is located in the Dartmouth Park Conservation Area. There are no listed or locally listed buildings on or adjacent to the site.

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 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 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.

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 for this site is considered necessary to support the delivery of 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 will 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.

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)

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 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.

There is developer interest in the site. The site has an extant planning permission for self-contained homes and sports facilities. There is also a current planning appeal yet to be determined on the site for a specialist care home and sports facilities. Together with ongoing pre application discussions.

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 MM46.

Site Allocation N3 Queen Mary's House

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 N3 was identified through a past planning permission.

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 North Camden. Policy N1 North 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 infrastructure in accordance with Policy N1, 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 through engagement with the landowner.

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 use is for permanent self-contained homes.

The allocation seeks to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 Maximising housing supply, taking into account the site's location in a residential neighbourhood in a conservation area. The Hampstead Neighbourhood Plan also supports the allocation of this site and the continued provision of affordable 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

The approach taken to estimating 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 98 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.

Specifically for this site, the capacity is based on the retention and extension of existing buildings with an element of infill new build. A scenario involving demolition was not tested given the site's location within a Conservation Area and the fact that Queen Mary's House is identified as a building of historical significance.

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 N3 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Site is within the Hampstead Conservation Area. 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.
- Queen Mary's House is considered to be of historical significance and much of the wall on Heath Street is Grade II listed. Criterion 1 of the site allocation policy states that development must retain the original Queen Mary's House building taking into account its historical interest and criterion 4 states that development must retain the listed wall on Heath Street, to mitigate any impact on the historic environment in accordance with Policy D5.
- Trees. Criterion 3 states that development must seek to protect existing trees on-site in accordance with Policy NE3 (Tree planting and protection), to mitigate any impact on existing trees.

- This site is within the Secondary A Aquifer. Policy NE4 Water quality sets out the Council approach to protecting water quality. This should ensure any impact is mitigated.
- Flood risk. As the site is within an area identified by the Council as being at risk of flooding Policy N3 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 N3 also sets out other site specific requirements, namely criterion 2 (affordable housing).

It is considered that the site specific requirements set out in Policy N3 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 very low risk of surface water flooding with limited potential for ground 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 N3 is located in the Hampstead Conservation Area. There is a Grade II listed wall on Heath Street with Grade II listed building south of the site on Heath Street and Hampstead Square. The site allocation is within an Archaeological Priority Area (Hampstead, 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 in years 2032/33 - 2033/34 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 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.

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 for this site is considered necessary to support the delivery of the site and reflects the Council priorities for the site.

The 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

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)

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 years 2032/33 - 2033/34 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

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 public ownership.

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

There is developer interest in the site. The owners have confirmed their desire to develop the site in their Regulation 19 consultation response.

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 MM47 and MM91.

Site Allocation N4 Hampstead Delivery Office

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 N4 was identified through the London SHLAA 2017.

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 North Camden. Policy N1 North 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 infrastructure in accordance with Policy N1, 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 the land identified in the London SHLAA.

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 use is for permanent self-contained homes.

The allocation seeks to make optimal use of the site by seeking to optimise residential use to contribute towards meeting Camden's need for housing, in accordance with Policy H1 Maximising housing supply, taking into account the site's location in a residential neighbourhood in a conservation area. The Hampstead Neighbourhood Plan also supports the provision of housing on this 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 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 45 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. The capacity was based on the demolition of the existing buildings given that the site is currently used as a Royal Mail delivery office and the existing structure is considered to be a relatively low quality building, which is unlikely to be suitable for an alternative use. It is considered that a scheme involving demolition on this site has the potential to provide benefits substantially greater than those that could be realised through the retention of the existing buildings. However, any application involving the substantial demolition of an existing building/s will need to demonstrate compliance with Policy CC2 Prioritising the retention of existing buildings, including consideration of whether the specific scheme proposed would constitute the best 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.

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 N4 identifies a number of constraints in relation to this site. These are set out below along with the proposed approach to mitigation:

- Site is within the Fitzjohns Netherhall Conservation Area. 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.
- This site is within the Secondary A Aquifer. Policy NE4 Water Quality sets out the Council approach to protecting water quality. This should ensure any impact is mitigated.

In addition to the above criteria Policy N4 also sets out other site specific requirements, namely criteria 1 (optimising development), 2 (design), 3 (active frontage / improvements to the pedestrian walkway).

It is considered that the site specific requirements set out in Policy N4 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 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 and limited potential for ground 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 N4 is located in Fitzjohns Netherhall Conservation Area. There are no listed or locally listed buildings on or adjacent to the site. 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 in years 2036/37 - 2037/38 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 and reflects the Council priorities for the site.

The 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

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)

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 years 2036/37 - 2037/38 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

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. Given this, it is taken 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.