



Camden Local Plan Examination Matters, Issues and Questions

Following my review of the evidence and the representations submitted on the Camden Local Plan (Local Plan) and having considered the Council's responses to my initial questions I have set out Matters, Issues and Questions (MIQs) on which I am seeking further representations. Participants should only respond to the questions directly related to the written representations they submitted during the Regulation 19 consultation on the Plan.

Further information on the Hearings is provided in the accompanying guidance note and should be read alongside the MIQs.

The Council has prepared a Schedule of Main Modifications that it considers could be made to the Plan in response to Regulation 19 consultation representations. Participants may comment on these in their representations.

Matter 1: Procedural and Legal Requirements

Issue:

Whether the Council has complied with the relevant procedural, legal and other requirements.

Questions:

Plan Preparation and Scope

1. Has the Plan been prepared in accordance with the latest adopted Local Development Scheme?
2. Have the relevant notification, consultation, publication and submission requirements been met in line with the Town and Country Planning (Local Planning) Regulations 2012 and Statement of Community Involvement?
3. What is the plan period and how is it justified?
4. What policies that make up the current development plan will be retained and what policies will be superseded following adoption of the submitted Plan?
5. Does the Plan clearly distinguish between strategic and non-strategic policies? Are strategic policies limited to those necessary to address the strategic priorities of the area and any relevant cross-boundary issues?

6. In terms of existing and proposed Supplementary Planning Documents (SPD):
 - a. Please provide their title, scope and timescales for adoption?
 - b. What is the intended relationship of each of the SPDs with specific policies in the Plan?
 - c. Is this relationship clear and appropriate?
 - d. Are there any elements of the SPDs that should be contained within policy?

Sustainability Appraisal

(Please focus on the legal compliance of the Sustainability Appraisal. Any implications of the Sustainability Appraisal on the soundness of individual policies should be addressed elsewhere).

7. In terms of the Sustainability Appraisal:
 - a. Is the methodology applied robust?
 - b. Is the baseline information upon which the Sustainability Appraisal is based up to date and relevant in terms of its scope?
 - c. How were the appraisal framework objectives of the Sustainability Appraisal derived and how do they link to the individual policies in the Plan?
 - d. How were the options considered through the Sustainability Appraisal for the following:
 - i. The overall scale of housing and other growth
 - ii. The broad distribution of development across the District
 - iii. Potential allocation sites
 - iv. Individual policy approaches
 - e. Is the assessment of the likely effects of the Plan's strategy, policies and allocations adequate? Is the scoring against the Framework objectives reasonable?
 - f. Is consideration of reasonable alternatives and reasoning for rejecting alternatives clearly justified?
 - g. How have the conclusions of the Sustainability Appraisal been reflected in the Plan?
8. Have any concerns been raised about the undertaking and/ or outcomes of the Sustainability Appraisal and what is the Council's response to these?
9. Have the legal requirements for Sustainability Appraisal / Strategic Environmental Assessment been met as part of the plan preparation process?

Habitats Regulations Assessment (HRA)

10. How was the HRA carried out and is the methodology appropriate?
11. Does the HRA identify all the relevant sites?
12. What potential impacts of the Plan, including in combination effects, were identified through the HRA and how have these been considered and addressed?

13. How have the conclusions of the HRA informed the preparation of the Plan?
14. Are the screening findings in the HRA justified and has a precautionary approach been taken?
15. Have any concerns been raised regarding the HRA and if so, what is the Council's response to the points made?
16. How has Natural England been involved in HRA matters and how have any concerns raised been responded to?
17. Overall, how does the HRA meet the Conservation of Habitats and Species Regulations 2017 as amended?

Climate Change

18. How does the Plan ensure the mitigation of and adaption to climate change, paying regard to the duty in S19(1A) of the Planning and Compulsory Purchase Act 2004?

Equality and Diversity

19. How has the Council had regard to all other relevant matters set out in section 19 of the Planning and Compulsory Purchase Act 2004 and Regulation 10 of the Town and Country Planning (Local Planning) Regulations 2012?
20. In relation to those who have a relevant protected characteristic, how does the Plan seek to ensure that due regard is had to the 3 aims expressed in section 149 of the Equality Act 2010?

Duty to Co-operate

21. Meeting housing need, accommodation for Gypsies and Travellers and tall buildings have been identified as strategic matters requiring cross boundary co-operation for the Plan. Have all the genuinely strategic matters requiring cross boundary co-operation been identified?
22. Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters with cross-boundary impacts, in order to maximise the effectiveness of plan preparation?
23. Has any neighbouring authority or Duty to Co-operate body indicated that the duty to co-operate has not been complied with? If so, what was the Council's response?
24. The Council has provided additional information to supplement Statements of Common Ground with neighbouring Local Planning Authorities. Have all relevant signed and dated Statements of Common Ground been provided and are they consistent with the requirements of the National Planning Policy Framework and the associated Planning Practice Guidance? If not, why?

25. The Council has provided additional information and Statements of Common Ground with 6 prescribed bodies. Have all the relevant bodies been identified and are the submitted Statements of Common Ground provided consistent with the requirements of the National Planning Policy Framework and the associated Planning Practice Guidance? If not, why?
26. What implications, if any, does Minister Pennycook's letter dated 27 November 2025 have for the examination? Specifically, if the Duty were to cease to apply over the course of this examination does the Council's co-operation raise any soundness concerns and, if not, how does the evidence base support that view?

General Conformity with the London Plan

27. Overall, is the Plan in general conformity with the London Plan and how is that evidenced?
28. Does the statement in SD19 that there are "no outstanding issues" apply to all strategic and soundness matters or only those listed? What issues are still dependent on future evidence before they can be resolved and how will this be addressed?
29. Is it clear how individual policies in the Plan relate to those of the London Plan?
30. Do any of the policies in the Plan duplicate the content of the London Plan? If yes, please provide details and justification.
31. Where a policy proposes a variation to a London Plan policy should the distinction be identified for clarity and effectiveness?

Oxford Street Development Corporation

32. What is the latest on the establishment of the Oxford Street Development Corporation and does it have any implications for the examination?

Matter 2: Vision, Objectives and Spatial Strategy

Issue:

Whether the Vision, Objectives and Spatial Strategy for Camden are positively prepared, justified, effective, consistent with national policy and, in general conformity with the London Plan.

Questions:

1. Does the Plan's vision and objectives provide a positively prepared and justified approach to Camden's future growth?
2. Are the objectives of the Plan clearly set out and are these measurable?
3. Are the scope and thrust of the Strategic Objectives of the Plan sufficiently reflected in the proposed policies and site allocations so that the Vision may be realised through their implementation?
4. Are any amendments to the Vision and Objectives required for soundness?
5. In terms of the distribution of development across the plan area:
 - a. Is it clear how and why the preferred spatial strategy has been selected?
 - b. What options have been considered for accommodating the identified development requirements in a sustainable manner? Have reasonable alternatives been considered?
 - c. Are the areas identified for new development the most appropriate locations? Is the rationale behind the choices and reasoning for conclusions clear and justified by the evidence? Have the locational needs of different sectors been addressed?
 - d. What roles have the Sustainability Appraisal and Viability Study had in influencing the spatial strategy?
 - e. Have the social, economic and environmental impacts of the spatial strategy on neighbouring areas been identified and addressed?
6. Should the Plan include a specific policy on the Knowledge Quarter?
7. Overall, is the Spatial Strategy sound, having regard to the Borough's assessed development needs, the requirements of national policy, and general conformity with the London Plan?
8. Are any modifications required to the spatial strategy for soundness?
9. Has a comprehensive assessment of the infrastructure needs been undertaken along with mechanisms that will be used for delivery?

10. Has the cumulative impact of all proposals in the Plan on infrastructure been taken into account in the Plan? What evidence demonstrates this and what mitigation will be put in place to ensure any negative effects are minimised?
11. Has appropriate consideration been given to the delivery risks for specific allocations? Do key infrastructure dependencies align with planned growth?
12. Does the strategy consider dependencies on large and complex schemes and does it include contingencies if anticipated quantum or timings change?
13. What indicators, baselines and targets will be used to monitor the delivery of the vision, objectives and spatial strategy and what triggers would prompt an early review or policy adjustment?

Matter 3: Meeting Camden's Housing Needs

Issue 1:

Whether the Plan has been positively prepared and is underpinned by up-to-date and robust evidence, and whether it is justified, effective, consistent with national policy and is in general conformity with the London Plan in relation to meeting Camden's housing needs.

Questions:

1. Is the overall quantity of new homes planned for Camden up to 2041 justified and consistent with national policy?
2. The Plan sets a borough wide housing requirement of 11,550 new homes during the plan period. Is this justified? If not, what should the housing requirement be?
3. Having regard to the London Plan 2021 requirement for net housing completions of 10,380 homes for the 10 year period 2019/20 to 2028/29:
 - i) What is the basis for the Plan identifying a housing requirement for the remaining years to the end of the Plan period?
 - ii) What is the justification for departing from the London Plan 2021 housing requirements, how is it supported by evidence, and does it raise any questions about whether the Plan is in general conformity with the London Plan?
4. Amongst other things, Policy H2 of the London Plan 2021 requires boroughs to identify and allocate suitable small sites (under 0.25 hectares) for housing. How does the expected proportion of homes to come forward on small sites in the Borough reflect a genuinely plan-led approach to meeting this requirement?
5. How clearly does the Plan explain the amount of housing expected to come forward on small and medium sized sites (up to one hectare) in line with the NPPF?
6. Are any modifications required for soundness?

Issue 2:

Whether the Plan will be effective in delivering affordable housing to meet the Borough's needs and in providing an appropriate mix and standard of homes for different groups in the community during the Plan period?

Questions:

7. What factors and evidence underpin the Council's approach to meeting objectively assessed needs for affordable housing?
8. Are the affordable housing needs in Camden clearly identified?

9. How does Local Plan policy support the delivery of the strategic target and approaches to the delivery of affordable housing set out in Policies H4 and H5 of the London Plan?
10. How well is the approach to affordable housing supported by robust evidence of financial viability, having regard to other requirements of the Plan and how clearly does it set out the decision making process for viability?
11. Is the type and tenure of housing needed for different groups in the community assessed and reflected in the Plan, including the groups of society set out in the NPPF?
12. Is the interaction with Policies H6 and H10 of the London Plan clear?
13. Having regard to the requirements of the NPPF, how do policies in the Plan assess and reflect the size, type and tenure of housing needed for different groups in the community and are they in general conformity with the London Plan?

Policy H1

With reference to Policy H1:

14. Is support for purpose built student accommodation in Policy H1 justified?
15. Is the definition of “permanent self-contained housing” justified and effective?
16. When considering optimising sites to deliver housing should paragraph 7.31 of the Plan refer to the Sustainable Residential Quality density matrix?

Policy H2

With reference to Policy H2:

17. Is the policy requirement to provide a mix of uses on all qualifying sites justified and effective?
18. Is the area where a contribution to permanent self contained housing is required justified?
19. Is the threshold of 200sqm or more justified and effective?
20. Given the Viability Study identifies that the viability of office led schemes varies by location, how will a 50% self contained housing requirement be deliverable across all defined high accessibility areas. Is the requirement justified and effective?
21. Does the policy provide sufficient flexibility in the type of housing provided?
22. To what extent do the policy requirements reflect the indicative site capacities identified for site allocations?

23. Is the relationship between Policy H2 and H4 clear?
24. Are the exclusions identified in the policy where a requirement is not required comprehensive and justified?
25. How does the requirement for residential development within non-residential schemes affect the economic objectives of South Camden and the CAZ?
26. Does the mixed use policy align with Policy SD4 and SD5 of the London Plan regarding the strategic functions of the CAZ?

Policy H3

With reference to Policy H3:

27. How does Policy H3 D.1 align with Camden's objective to maximise housing supply?
28. How does consolidation affect the availability of smaller, more affordable market units?

Policy H4

With reference to Policy H4:

29. Is the policy consistent with national policy and in general conformity with the London Plan?
30. What evidence underpins the borough wide target of 3,000 additional affordable homes between 2026/27-2040/41?
31. The Viability Study finds that there is no uniform level of affordable housing that can viably be delivered across the borough. How has the Council ensured that the 50% strategic target is deliverable?
32. What is the basis of setting a threshold of 100sqm?
33. Is Policy H4 of the Camden Local Plan in conformity with Policy H4 of the London Plan?
34. Is a sliding scale for affordable housing below 10 dwellings justified and effective?
35. What effect is the policy expected to have on affordable housing provision in the Borough?
36. Is reference to flexibility in tenure split sound?
37. What evidence is there to support the requirement in Policy H4B(8) that may require developments of 100+ homes to provide affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision?

38. Have the viability impacts of the policy been tested? If so, what were the findings? Does the viability evidence support Camden's affordable housing targets and tenure mix?
39. Should the Local Plan explicitly reference Shared Ownership as acceptable where it meets London Plan affordability criteria?
40. Is the approach to payment in lieu of provision clear and effective?
41. Is there sufficient flexibility in the policy?

Policy H5

42. Is Policy H5 effective in protecting and improving affordable housing?

Policy H9

With reference to Policy H9:

43. Is the Council's approach to identifying a target of 200 additional places in student housing per year justified and effective?
44. How does the policy demonstrate general conformity with London Plan?
45. Should Policy H9 make specific reference to the Bloomsbury Campus Area?
46. In B.1 of the Policy what is meant by "disproportionate loss", how will it be determined and is it effective?
47. Is the requirement in B.3 of the Policy to comply with relevant standards for houses in multiple occupation justified?
48. In B.12 of the Policy how will an "appropriate contribution" be determined?
49. The Viability Study identifies that purpose built student accommodation viability is stronger in the south of the borough. How has spatial variation informed the borough wide implementation of Policy H9?
50. What indicators, baselines and targets will be used to monitor affordable housing and housing mix outcomes and what triggers would prompt an early review or policy adjustment?

Monitoring

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

Modifications

52. Are any modifications required for soundness?

Issue 3:

Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in addressing the accommodation needs of Gypsies, Travellers and Travelling Showpeople?

Questions:

53. To what extent can the evidence of need used by the Council provide:
 - a) A robust and up to date assessment of need that reflects current circumstances?
 - b) Sufficient justification for any changes in the numbers of Gypsies, Travellers or Travelling Showpeople now living the Borough?
 - c) Justified assumptions on household formation rates, evidence of concealed households, overcrowding or pitches/ plots that should be accommodated in the Borough?
54. How will the need for Gypsy, Traveller and Travelling Show People within the Borough be met?
55. Is the approach to Policy H11 consistent with the Planning Policy for Traveller Sites (PPTS) insofar as it expects plans to a) identify a supply of specific deliverable sites to provide 5 years worth of sites against locally set targets and b) to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15?
56. How does the Plan address the needs of Gypsies in light of the Smith v Secretary of State [2022] EWCA Civ 1391 judgement regarding the interpretation of Planning Policy for Traveller Sites and the application to Gypsies and Travellers who have ceased to pursue a nomadic lifestyle?
57. Does the Plan respond appropriately to the needs of other members of the travelling community, including Travelling Show People and Boat People?
58. Has the need for any transit sites within the Borough been considered and where appropriate addressed?
59. Do the requirements of criterion B of Policy H11 provide a positively prepared and effective approach to safeguarding existing sites to support the needs of Gypsies, Travellers and Travelling Showpeople?
60. Criterion C of Policy H11 allocates 2 permanent traveller pitches. What process and methodology did the Council use to identify and determine which sites to allocate? Is the approach sound?
61. Does the requirements of criterion D of Policy H11 provide a positively prepared approach in setting criteria for sites to come forward as windfalls and is the approach justified and consistent with paragraphs 25-28 of the PPTS?

Monitoring

62. What indicators will the Council use to monitor Gypsy, Traveller and Travelling Showpeople needs and what triggers would prompt an early review or policy adjustment?

Modifications

63. Are any modifications necessary for soundness?

Matter 4: Housing Land Supply

Issue:

Whether the Local Plan is justified, effective and consistent with national policy, and in conformity with the London Plan in relation to demonstrating the housing land supply position throughout the plan period.

Questions:

1. What is the relevant 5-year period on adoption and what is the 5- year housing land requirement?
2. Does the trajectory identify the components of the housing land supply across the plan period with sufficient clarity? Is it based on up-to-date evidence?
3. The Council Housing Trajectory and 5 Year Housing Land Supply Note (SD14) provides 3 different 5 year housing land supply results; 5.2 years, 4.4 years and 2.8 years. Which of the supply results is the Council relying upon for soundness and does this comply with national policy requirements for backlog and a buffer?
4. What modifications would be required to make the Plan deliverable in the event that only 2.8 year supply could be shown, with national backlog and buffer requirements on top?
5. Document SD14 states at paragraph 5.3 that increasing delivery or adding a buffer in the early years “would not be achieved”. What evidence supports the statement that additional early period uplift or the addition of a buffer is “not achievable” and how does this affect the effectiveness of the anticipated supply?
6. The plan incorporates an assumed London Plan backlog of 1,721.4 homes to 2025/26. What is the evidence base for the assumed backlog of 1,721.4 and how does this relate to the subsequent updated backlog of 2,724.8 homes?
7. The Plan assumes that only half of Euston capacity (875 homes) is delivered in the Plan period. What evidence supports the delivery of the 875 homes within this timeframe given noted delays?
8. Overall, are the assumptions about deliverability realistic and justified?
9. Several major sites are at pre-application stage but have nonetheless been included as deliverable (for example, St Pancras Hospital, Royal College Street, Regis Road). What evidence demonstrates deliverability in instances where a site does not have planning permission?
10. Does the evidence demonstrate that at least 10% of the housing requirement set out in the Plan would be delivered on smaller sites?
11. What is the compelling evidence to show that windfall sites will provide a reliable source of supply as anticipated in the Plan?

12. Does the Plan provide appropriate contingency to ensure a sufficient pipeline supply of homes? What flexibility is there within the Plan should some of the housing allocations not come forward in line with expected timescales?
13. Does the evidence demonstrate that the Plan, taken together with completions, commitments and allocations in the existing development plan for the area and windfall allowance will provide a supply of specific, developable or broad locations for growth for years 6-10 and wherever possible years 11-15 of the plan period?
14. Based on the housing trajectory, how many dwellings are expected to be delivered in the first 5 years following adoption of the Local Plan? How many dwellings would come forward from each source of supply?

Monitoring

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

Modifications

16. Are any modifications required for soundness?

Matter 5: Delivering an Inclusive Economy

Issue: Whether the Plan has been positively prepared, is justified, effective, consistent with national policy and in general conformity with the London Plan in addressing the economy and employment needs of the Borough.

Questions

1. What is the identified need in terms of economic development and does the Plan provide a robust approach to identifying and bringing forward developments to meet the identified need?
2. Should the Plan include a strategic policy setting out an overall employment requirement for the Borough during the Plan period?
3. The Council's Economic Needs Assessment 2023 forecasts demand for 406,359 sqm of net additional floorspace up to 2041. Is the Council approach to meeting this requirement positively prepared, justified and effective?
4. Is the Council's approach to industrial land provision by intensifying employment uses on designated and non-designated sites positively prepared, justified and effective?
5. To what extent are the employment growth proposals of the Plan consistent with national policy and in general conformity with the London Plan?

Policy IE1

With reference to Policy IE1:

6. Are the requirements of Policy IE1 in relation to the provision of facilities such as childcare facilities (criterion 11) justified?
7. Is the requirement to provide high-speed, reliable digital connectivity in criterion 12 justified?

Policy IE2

With reference to Policy IE2:

8. Is the requirement in criterion C to market offices using a variety of agents for at least 12 months justified?
9. Is the requirement in criterion C (part 2) of the Policy to consider discounted rents, incentives and flexible leasing arrangements justified?
10. Is the requirement in criterion C (part 3) of the Policy to consider reconfiguration of the premises justified?
11. Should railway arches be excluded from the requirements of criterion C of the policy?

12. Is the preference for housing in circumstances where an office use of a building is no longer feasible in Policy IE2 justified?
13. In criterion D of the Policy, is the requirement to retain a proportion of floorspace as affordable workspace in losses over 4,000sqm (GIA) justified and effective?

Policy IE3

With reference to Policy IE3:

14. Should the Plan identify the amount of industrial capacity that is required to be delivered over the Plan period?
15. What is the purpose of the Policy and how does it support the strategic objectives of the Plan?
16. Are the circumstances in which the loss of industrial and warehousing land identified in criterion B of the Policy justified, effective and comprehensive?
17. Is criterion 2B of the Policy justified?
18. How does the Plan balance priorities regarding industrial retention and housing delivery?

Policy IE4

With reference to Policy IE4:

19. What evidence supports the requirement in A.2 of the Policy which seeks a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent?
20. Is the minimum period of 15 years justified given that the Viability Study has established that term length is a viability variable?
21. Should there be any exemptions from the requirements of the Policy?
22. What are the viability implications of the Policy requirements?

Policy IE5

23. Criterion B.2 of Policy IE5 refers to smaller and medium-sized hotels. How are these defined?

Policy IE6

With reference to Policy IE6:

24. Criterion A.6 of the Policy requires there to be evidence that a centre is in decline and struggling relative to other similar centres in Camden. What evidence would this include and is the requirement justified?
25. Criterion A.9 of the Policy resists proposals involving the formation of larger units in certain circumstances. Is this justified and effective?
26. In criterion A.10 of the Policy, what evidence is there to support the requirement for developments providing 2,500 sqm or more of retail floorspace to include a proportion of smaller units, including floorspace available at a discount to market rents?

Policy IE7

With reference to Policy IE7:

27. What evidence supports the proposals in criterion A.1 and A.2 of the policy to resist new hot food takeaways in certain locations within the Borough?
28. Is the requirement for hot food takeaways to undertake a Health Impact Assessment in line with criterion A.3 of Policy IE7 justified?

Policy IE8

With reference to Policy IE8:

29. How does the Plan define “gambling uses” and is it consistent with national policy?
30. What is the policy objective behind restricting gambling uses and how does this relate to the Plan’s strategic aims for the economy?

Policy IE10

With reference to Policy IE10:

31. How does the Policy align with national policy objectives for supporting economic growth and town centre vitality?
32. What evidence is there to support the position that specifying rent variety in the policy is necessary and effective for supporting start-ups and affordability in Camden markets?
33. Do the policy requirements have any impact on viability?

Monitoring

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

Modifications

35. Overall, are any modifications required to economic policies in the Plan required for soundness?

Matter 6: Supporting Camden's Communities

Issue:

Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to community infrastructure?

Questions:

Policy SC1

With reference to Policy SC1:

1. Is the Policy consistent with national policy and in general conformity with the London Plan?
2. What evidence supports the threshold and scope for Health Impact Assessments, in part C of the Policy?

Policy SC2

With reference to Policy SC2:

3. Is Policy SC2 consistent with national policy and in general conformity with the London Plan?

Policy SC3

With reference to Policy SC3:

4. Is Policy SC3 consistent with national policy and in general conformity with the London Plan?
5. Does the Policy provide clarity to applicants on when and how contributions will be sought?
6. Are the requirements of criterion D.1b of Policy SC3 which expects the provision of marketing and vacancy evidence for a 12 month period justified and effective?

Policy SC4

With reference to Policy SC4:

7. How does the Policy reflect the expectations of Policy G4 of the London Plan?
8. How has the Council reviewed its evidence on open space provision and standards to establish whether it remains valid and how does this underpin the justification for the Plan's approach?

9. What evidence supports the use of a standards based approach for new open space and sports provision?
10. Why was a standards based approach chosen over alternatives such as the Sport England's Sports Facility Calculator or Playing Pitch Calculator?

Policy SC5

With reference to Policy SC5:

11. Is Policy SC5 consistent with national policy and in general conformity with the London Plan?
12. Are the requirements of Policy SC5 justified?

Policy SC6

With reference to Policy SC6:

13. Is Policy SC6 consistent with national policy and in general conformity with the London Plan?
14. Are the requirements of criterion D of the policy justified?

Policy SC7

With reference to Policy SC7:

15. Is Policy SC7 consistent with national policy and in general conformity with the London Plan?

Monitoring

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

Modifications

17. Are any modifications necessary for soundness?

Matter 7: Design and Amenity, Tall Buildings and the Historic Environment

Issue:

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

Questions:

Policy DS1

With reference to Policy DS1:

1. Is it consistent with national policy and in general conformity with the London Plan?
2. Will the requirement to prepare a joint masterplans and/or design codes for sites in multiple ownership be effective in bring sites forward for development?
3. Does the policy requirement for major development to contribute to the Citizen Scientist programme meet the tests required for S106 agreements (necessary to make the development acceptable in planning terms, directly related to the development, fairly and reasonably related in scale and kind to the development) and is it justified?

Policy D2

With reference to Policy D2:

4. Is Policy D2 positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan?
5. Is the methodology and findings of the Tall Buildings Study robust?
6. How has the findings of the Building Heights Study been applied in the Plan and has this been done consistently?
7. How does the Plan reflect the guidance contained in the London View Management Framework?
8. Is it clear what heights are acceptable in different locations within the Borough?
9. Is criterion C.5 of the policy necessary given that the Plan should be read as a whole?
10. Is criterion C.9 of Policy D2 (which requires attention to be given to the relationship between building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views) consistent with the requirements of

criterion B4 of Policy D1 (which expects development to respect local views and preserve protected strategic views)?

Policy D3

With reference to Policy D3:

11. Is it consistent with national policy and in general conformity with the London Plan?
12. What evidence is there to justify the requirement that new-build self contained housing are to meet Parts M4(2) or M4(3) of the Building Regulations?

Policy D5

With reference to Policy D5:

13. Is the approach in Policy D5 relating to the historic environment positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan. In particular:
 - a) To what extent is the approach consistent with national policy on conserving and enhancing the historic environment?
 - b) The approaches to proposals affecting designated heritage assets, the significance of heritage assets and harm – whether substantial or less than substantial?
 - c) Development affecting Conservation Areas?
 - d) Development affecting Listed Buildings?
 - e) How heritage at risk is considered?
 - f) How sites of archaeological importance are managed?
 - g) Development affecting Registered Parks and Gardens?
 - h) Development affecting non-designated heritage assets?
14. How does the Plan conform with the heritage policies of the London Plan whilst dealing with local heritage concerns?
15. With reference to the Borough's heritage assets:
 - a) What heritage assets could be affected by the proposals in the Plan and how have they been identified?
 - b) How have the potential impacts been assessed and has this been done in a clear and consistent manner that demonstrates an effective understanding of their significance?
 - c) How has the setting of the assets been taken into account?
 - d) What, if any, concerns have Historic England raised and how have they been addressed?
16. Is Policy D5 consistent with national policy and in general conformity with the London Plan?

Policy D6

With reference to Policy D6:

17. Is it consistent with national policy and in general conformity with the London Plan?
18. Are the requirements of Policy D6 justified?
19. Are the requirements of Policies A1-A4 justified and effective?

Monitoring

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

Modifications

23. Are any modifications necessary for soundness?

Matter 8: Safe, Healthy and Sustainable Transport

Issue:

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

Questions:

With reference to Policy T1:

1. Is it consistent with national policy and in general conformity with the London Plan?
2. Should the supporting text of the Policy acknowledge infrastructure linkages to neighbouring areas?

With reference to Policy T2:

3. Are the requirements in criterion C.2 of the policy in relation to the requirement to provide cycle parking facilities that exceed the minimum standards outlined in the London Plan justified?
4. Is the Policy effective in its consideration of pedestrians?

With reference to Policy T3:

5. Is it consistent with national policy and in general conformity with the London Plan?
6. Are the requirements regarding expected contributions towards step free access, interchange improvements and bus priority measures viable and deliverable?

With reference to Policy T4:

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

With reference to Policy T5:

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

With reference to Policy T6:

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

Monitoring

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

Modifications

11. Are any modification necessary for soundness?

Matter 9: Climate Change and the Environment

Issue 1: Climate Change

Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan with regard to climate change.

1. Is the Plan's approach to climate change consistent with national policy and in general conformity with the London Plan?
2. What is the background to the approach to operational energy performance set out in the Plan and what is the evidence to justify it?
3. How will the requirements of Policy CC2 affect the delivery of relevant allocated sites?
4. What are the implications of Policy CC2 of the viability of development? What evidence is there to support this?
5. In Policy CC3, is it clear in what circumstances a Construction Management Plan is required and what should be included?
6. Is Policy CC6 consistent with the parameters set out in the Written Ministerial Statement on Energy Efficiency (December 2023) in terms of:
 - a. the proposed target levels
 - b. the robustness of the submitted evidence supporting any proposed uplift
 - c. how the proposed targets are expressed within policy
 - d. the viability implications on future development proposals, including when assessed cumulatively with other development plan policy requirements
 - e. providing flexibility to respond to the viability findings of individual schemes

Monitoring

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

Modifications

8. Are any amendments necessary for soundness?

Issue 2: Environment

Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan with regard to the environment.

9. Is the Plan's approach to the environment consistent with national policy and in general conformity with the London Plan?

10. To what extent does Policy NE1 adequately reflect the role of gardens in conserving and enhancing Camden's natural environment?
11. Does Policy NE1 identify all the areas that require protection in order to conserve and enhance the natural environment?
12. Are the requirements of criterion A.1 of Policy NE2 justified?
13. Are the requirements of criterion A.2 of Policy NE2 justified?
14. Should the Policy wording make specific reference to Local Nature Recovery Strategies?
15. Are the requirements of Policy NE3 effective in protecting existing trees and securing additional trees within the borough?
16. How is the two for one replacement benchmark in Policy NE3 justified and will it be effective?

Monitoring

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

Modifications

18. Are any amendments required for soundness?

Matter 10: Site Allocations and Area Based Policies

Issue 1: Site Allocations

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.

Questions:

1. For each proposed development site, please set out:
 - a. The background to the site allocation and how it was identified;
 - b. How the site contributes to delivering the spatial strategy;
 - c. How the boundaries and extent of the site have been defined and justified;
 - d. The uses to be permitted and how they are justified;
 - e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified;
 - f. For employment proposals, the estimated floorspace and whether it is justified;
 - g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified;
 - 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;
 - j. How any site-specific recommendation on building heights is justified on terms of local context;
 - 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?
 - l. Is the approach of the Plan to air quality matters relating to planned growth sound?
 - 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;
 - n. Evidence of the expected timescale and rate of development, and whether they are realistic;
 - o. The highways implications of the site, including accesses and the effect on the highway network;
 - 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;
 - r. Clear evidence of whether the site is 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; and
- t. Any modifications that are necessary for reasons of soundness.

Issue 2: South Camden

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

Questions:

With reference to Policy S1:

- 2. How does the designation of Seven Dials as a “Specialist Area” affect its ability to support evening and night-time economy activities?
- 3. What role does the British Museum make to the area? To what extent is this appropriately reflected in Policy S1?
- 4. To what extent does the Policy S1 conform with the London Plan?

With reference to Policy S2:

- 5. What is the purpose of the policy and is the scope appropriate?
- 6. Should Policy S2 support educational uses in the Euston Area?
- 7. Is it appropriate for Policy S2 to specify a housing requirement of between 1,500 and 2,500 additional homes with the provision of appropriate replacement homes?

With reference to Policy S3:

- 8. What impact will the requirement of Policy S3(d) have on the viability of development? What evidence is there to support this?
- 9. Should Policy S3 enable the delivery of uses that are alternative to jewellery such as office space?
- 10. Is the requirement in Policy S3(c) that seeks to deliver 50% of additional floorspace in developments of more than 200sqm at 50% below market value for equivalent jewellery related uses in the Hatton Garden justified and effective?

With reference to Policy S3:

- 11. Is reference to “University of London or its member institutions” an appropriate term of reference in Policy S4?

12. Is Policy S4 sufficiently flexible to enable Higher Education institutions to adapt to meet changing needs?
13. How was the boundary map for Policy S4 determined? Is it justified and effective?

With reference to the site allocations:

Site Allocation S6

14. Is residential development at this location compatible with the adjacent cement and aggregates rail depot?

Site Allocation S8

15. What are the site constraints facing this site and to what extent is this reflected in the policy requirements?
16. Are the uses identified for the site appropriate?
17. Are the requirements of the policy justified and consistent with national policy?
18. Is criterion 4 of the policy necessary and effective and is it consistent with Policy D5?

Site Allocation S10

19. What are the site constraints facing this site and to what extent is this reflected in the policy requirements?
20. What evidence is there to demonstrate that housing can be delivered on the site?
21. How will multiple ownership of the site effect delivery?

Site Allocation S13

22. Are the identified uses for the site justified and appropriate?
23. Are tall buildings justified in this location?

Site Allocation S20

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

Modifications:

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

Issue 3: Central Camden

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

With reference to Policy C1:

26. Do the requirements set out in Policy C1 provide sufficient detail to be effective?
27. With regards criterion O(1), is step free access at Chalk Farm station deliverable? If not are amendments to the policy necessary?
28. With reference to criterion O(3), does the Plan provide clear evidence that the objectives of supporting the Camden Highline and reinstating 4 tracks and a third platform at Camden Road station compatible. If not, how does the policy resolve the conflict?

With reference to Policy C2:

29. Do the requirements of the policy give sufficient priority to pedestrians?
30. Is a comprehensive masterplan for the site deliverable and would piecemeal development achieve regeneration and the strategic objectives for the area? What evidence is there to support this?
31. Does the policy enable vehicular and pedestrian access to the Big Yellow store? Are any modifications required for soundness?
32. Does the policy provide sufficient flexibility?

With reference to Policy C3:

33. Do the requirements of the policy give sufficient priority to non vehicular modes of travel through the site?
34. Are the uses identified for the site appropriate?

With reference to the site allocations:

Site Allocation C4

35. Does the wording of the policy make it clear that a continuing police use presence is expected on the site?
36. Is a pedestrian and cycle link between Holmes Road and Regis Road justified and effective?

37. Are the uses identified for the site appropriate?

Site Allocation C5

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

Site Allocation C6

39. Is it clear what is meant by “alternative community use?”

Site Allocation C7

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

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

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

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

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

Site Allocation C8

45. Are the proposed uses for the site justified?

Site allocation C10

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

Site allocation C11

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

Site allocation C12

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

Site allocation C14

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

Site allocation C16

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

Site allocation C17

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

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

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

Site allocation C21

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

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

Site allocation C22

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

Site allocation C23

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

Site allocation C27

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

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

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

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

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

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

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

Modifications:

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

Issue 4: West Camden

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

Questions:

With reference to site allocation W2

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

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

Modifications

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

Issue 5: North Camden

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

Questions:

69. With reference to site allocations:

Site allocation N2

70. Is the identified site capacity justified?

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

Site allocation N3

72. Is the identified site capacity justified?

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

Modifications

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

Issue 6: Site Allocation and Area Based Policies Monitoring

Question:

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

Matter 11: Viability

Issue:

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

Questions:

1. How has the Council ensured that its viability evidence is up to date in line with national policy and guidance and in what ways has the evidence shaped the policy requirements of the Plan?
2. How are the development requirements and principles set out in the Plan's policies justified, effective and aligned with national policy and the London Plan in relation to:
 - a) Affordable housing
 - b) Housing mix
 - c) On and off site provision of services and facilities and
 - d) Financial contributions towards infrastructure?
3. How has the Council ensured that typologies chosen reflect the scale and nature of likely development, particularly in lower value or high existing use value locations?
4. The Viability Study identifies that when all policy requirements are applied some schemes in lower value zones move into negative residual land value. How will the Plan ensure that the cumulative cost of all policy requirements does not undermine the deliverability of the Plan's objectives?
5. What does the evidence show about the impact of the Plan's policy requirements on the viability and deliverability of allocated sites and has this been addressed to ensure the Plan is sound?