Part 2 - Consultation on the Regulation 18 Draft Camden Local Plan

The draft new Camden Local Plan was published for consultation and engagement for a period of 8 weeks from 17 January to 13 March 2024, to enable residents, businesses, community groups, landowners and other key stakeholders to share their views on the Plan's policies and approach.

The Plan was available to view online on the planning pages of the Council's website, and on 'we are Camden' the Council's consultation hub. We also created an interactive version of the draft Local Plan on commonplace to aid accessibility Have Your Say Today - Draft New Camden Local Plan - Commonplace Responses were invited via the commonplace site, by email and by letter.

A hard copy of the draft Local Plan was also available to view in all Camden's libraries and this was advertised on our website and on the promotional material we sent out.

The consultation on the draft new Local Plan was widely advertised through the following channels:

- An email sent to our consultation database (895 contacts), neighbourhood forums and Members. We also asked other services to email their contacts;
- An email sent out by commonplace to everyone who has signed up to be notified about Camden consultations (4,000 people);
- We are Camden consultation page;
- Planning policy webpages and a news article on the Council's website;
- The Council's social media platforms, including Facebook and Twitter;
- Posters sent to libraries and community centres to display;
- A press release was sent to local newspapers, which resulted in an article in the Ham and High;
- An advert in the Ham and High and Camden New Journal;
- A short article about the engagement included in the January business newsletter, VAC newsletter, libraries newsletter, friends of Camden's parks newsletter; and climate action newsletter;
- Development Management email alerts; and an
- Article in our Planning Policy Newsletter.

A list of the ‘specific consultation bodies’ we consulted with (as stipulated by the Regulations) and the ‘general bodies’ we consulted with are set out in Part 4 of this report. Details of consultation undertaken with statutory bodies is also set out in the Council’s Duty to Co-operate Statement.

As part of the engagement on the draft new Local Plan we also held a number of meetings, including:

- Three online public engagement sessions held on the 1 February, 7 February and 13 February 2024, to give residents the opportunity to find out more about the Plan and ask questions;
- A workshop with d/Deaf and disabled residents and representative groups held on the 7 March 2024, to discuss what more the Plan could do to better meet their needs;
- A workshop with students from Regent’s High School held on the 31 January 2024, to get their perspective on the policy approach in the Plan and find out how they would like Camden to change in the future; and
- A workshop with the Camden Developer Working Group.

In total we received over 2,350 comments from 245 respondents. 125 respondents commented through commonplace and 120 via email. Over the consultation period, there were also over 5,000 visits to the commonplace site.

A wide range of responses were received to the consultation, with the chapters that generated the most comments overall being:

- The South Area and Central Area chapters, including site allocations;
- Climate Change;
- Design; and
- Housing.

Summary of Consultation Responses

A summary of the consultation responses received and the Council’s response to these is set out by chapter below.

General Comments on the Plan

In total **92** general comments have been made on the Plan. Of these, **50** representations were received via commonplace and **42** representations were received via email.

Responses were received from the following consultees:

- MOD Defence Infrastructure Organisation
- Natural England
- Primrose Hill Conservation Area Advisory Committee
- NHS Healthy Urban Development Unit
- NHS Property Services
- MOD Safeguarding Infrastructure
- London Property Alliance
- Home Builders Federation
- Bedford Estates
- Dartmouth Park Neighbourhood Forum
- Tarmac Trading Ltd
- Lendlease and Euston owners
- Sport England
- University College London (UCL)
- Canal and River Trust
- Covent Garden Community Association
- British Museum
- Historic England
- Highgate Society
- Members of the public

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcome the opportunity to review the draft local plan. No further comments at this stage.	Comment noted.	No change proposed.
Natural England have no comments to make on the draft Local Plan for Camden Council.	Comment noted.	No change proposed.
There is concern that there are inconsistencies within the plan, particularly with regards to heritage. Heritage-led developments have previously been successfully carried out in Camden to the benefit of residents, visitors, businesses and developers. The clarity of heritage policy and cooperative working of Council and communities	Comment noted. Specific comments are addressed in relevant sections.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
should be maintained not weakened in facing the challenges of our times.		
With regards to the site allocations, for residential schemes over fifty dwellings the following wording is suggested under 'Infrastructure Requirements'. "Applicants will be required to liaise with the NHS early in the design process to identify the mitigation required in particular circumstances".	We propose to update the supporting text of Policy SC1 Improving health and wellbeing to state that "…we will also expect applicants to liaise with NHS partners early on in the design process to identify what mitigation is required in particular circumstances." Given the Plan should be read as a whole, we do not consider it necessary to insert this wording into every relevant site allocation.	Change proposed.
NHSPS requests health infrastructure be clearly identified in as essential infrastructure, with an expectation that developers will be obligated to meet the cost of healthcare infrastructure made necessary by the development. Significant housing growth must be met with appropriate funding for health and care services to mitigate direct impacts (both for major schemes and cumulative impacts of smaller schemes.	Draft policy SC1 (Improving Health and Wellbeing) part B vi specifically requires development to support the provision of new or improved health facilities in line with NHS requirements.	No change proposed.
Emphasis on the importance of managed implementation so that healthcare infrastructure is delivered alongside new development.	Comment noted.	No change proposed.
The NHS, Council and other partners must work	Comment noted.	No change proposed.

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together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area.		
The Local Plan should include specific details of the process for calculating developer contributions to health infrastructure to ensure the assessment is robust and in line with NHS requirements.	The Plan states that the Council and NHS partners will use the NHS London Healthy Urban Development Units Planning Contributions Model to assess the health service requirements and cost impacts of new residential developments. We are also proposing to update the Plan to state that "…we will also expect applicants to liaise with NHS partners early on in the design process to identify what mitigation is required in particular circumstances." Given this no additional wording is considered necessary.	No change proposed.
The Council should engage with the NHS and integrated care board (ICB) as part of preparing the Infrastructure Delivery Plan (IDP) regarding the process for determining the appropriate form of contribution towards healthcare provision. Demand should be assessed and existing capacity should be understood in order to direct healthcare provision effectively.	The Council has engaged with the ICB when preparing the infrastructure schedule in Appendix 1 of the draft Plan and will continue to engage with the ICB when preparing the Infrastructure Delivery Plan (IDP) to be published alongside the next version of the Plan.	No change proposed.
Healthcare providers should have flexibility in	The Council have secured both onsite health	No change proposed.

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determining the most appropriate form of healthcare provision, including requirements for new facilities where demand is such. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.	infrastructure and financial contributions from relevant developments, and will continue to engage with the NHS regarding provision on appropriate schemes.	
The area covered by the Camden Local Plan contains and is washed over by MOD safeguarding zones that are designated to preserve the operation and capability of RAF Northolt.	The Council have reviewed the safeguarding zones and consider the draft plan to be in accordance with the MOD requirements.	No change proposed.
A reminder to developers of the statutory requirement to consult the MOD on development that triggers the criteria set out in safeguarding plans and constraints that might be applied to development.	It has been confirmed that the development management service holds up-to date records regarding the MOD safeguarding zone constraints.	No change proposed.
Local Plans should refer to MOD safeguarding zones and/ or provide developers with indicators of limitations.	It is not considered necessary to refer to the safeguarding zone within the Local Plan, as it only affects a small proportion of the borough. If planning applications come forward that are within the safeguarding zone then this will be flagged as a planning constraint and dealt with through the planning application process.	No change proposed.
There is general support for seeking to deliver on "We Make Camden's"	The draft Plan has been subject to a viability study to ensure its policies can	No change proposed.

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ambitions and strategic objectives for development. However, there is concern that draft local plan policies and obligations are layered as such that there is limited flexibility to enable achievement of the We Make Camden vision.	be delivered. Policies are applied with appropriate flexibility and consideration of viability on a case-by-case basis.	
It is noted that a new London (regional) plan is due to be adopted within the life of this draft local plan, and with this in mind, policies should support higher levels of housing delivery.	The next London Plan will set updated housing targets for all boroughs, as noted in the comment. This will allocate London's housing need across the boroughs based on an assessment of their capacity to deliver homes. The draft Local Plan seeks to optimise housing supply taking account of the capacity and availability of development sites in the borough.	No change proposed.
The Plan should acknowledge and make reference to possible future Local Development Orders (LDOs) and Local Listed Building Consent Orders (LLBCOs), with potential to assist delivery of key Council objectives, e.g.) sustainability and energy efficiency, accessibility and works to listed buildings, to mutual benefit of landowners and Council.	The Council has no current plans to introduce LDOs or LLBCOs. Any future decision on this would be taken separately to the preparation of the Local Plan.	No change proposed.
The neighbouring Royal Borough of Kensington and Chelsea introduced LLBCOs relating to solar panels and double glazing. These	As the comment notes, any future decision on LDOs or LLBCOs would be taken separately to the preparation of the Local Plan. The Council has no	No change proposed.

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mechanisms can be introduced separately to the Local Plan process, however it is considered that reference should be made to their potential.	current plans to introduce LDOs or LLBCOs and a reference to them in the plan is not considered necessary.	
General support.	Support welcomed.	No change proposed.
There is concerns that the draft plan documents are very detailed, technical and lengthy which may be daunting to the general public. Consultation would have benefitted from having questions or options to choose from and an easy read version should be available.	By their nature local plans need to contain a certain level of detailed content, which we acknowledge can by daunting for the general reader. Therefore in addition to the Plan itself we set up a consultation website using 'commonplace' to help to engage consultees and encourage wider input.	No change proposed.
The Draft Local Plan is noted to overlap with the policies within Dartmouth Park Neighbourhood Plan. However the DPNP has a specific policy requirement for good design, and it is implied the Draft Local Plan should include a consolidated policy for design.	The new draft Local Plan has a dedicated design policy - D1 - Achieving Excellent Design, which is part of the Design and Heritage chapter.	No change proposed.
The evidence base used in the preparation of the draft plan should include links to neighbourhood plans.	We propose to update our website to include a link to the neighbourhood planning pages of the website from the evidence page. As all existing neighbourhood plans have been taken into consideration in the preparation of the Plan.	Change proposed.
It is noted that the Council have consulted on the draft local plan as per the	Comment noted.	No change proposed.

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Council's Statement of Community Involvement. However it should also be recognised that members of the general public being consulted must balance their own commitments with any desire to respond to local plan consultations. Absence of response does not equate to support for proposed policies.		
The King's Cross Concrete Plant is of strategic importance to the delivery of housing and new office space targets. Whilst the draft plan makes reference to King's Cross Concrete Plant in non-policy paragraphs, there is no mineral infrastructure safeguarding proposed in policy terms. Suggestion for additional policy: it is considered "that the draft plan should add policy protection for mineral sites, particularly trackside and rail linked ones such as Kings Cross, and place greater emphasis on the importance of such sites being crucial to supporting the delivery of ambitious development targets." (To be in line with London Plan policy SI 10 'Aggregates').	The Local Plan Policies Map designates the concrete plant at King's Cross as an Aggregate Safeguarding Site, although this is not mentioned in the Draft Plan. We propose to add a reference to this protection in policy S1 - South Area.	Change proposed
Support for the Local Plan review with effective and up to date policies.	Support welcomed.	No change proposed.

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The Local Plan should adopt a flexible approach to largescale mixed use masterplans, e.g.) Euston Masterplan. The Local Plan should reflect the viability challenges.	Para 15.37 of the draft Plan highlights the importance of sensitivity and flexibility with regards to the implementation of policies, but also the need to avoid uncertainty to deliver Camden's vision and objectives. The council's approach to delivering development at Euston shall be set out in detail in the EAP rather than the Local Plan.	No change proposed.
It is noted that the Euston Area Plan is also being updated, and that this draft Local Plan has not considered development sites which sit within the EAP boundary.	Comment noted.	No change proposed.
There is concern that the Local Plan and the Euston Area Plan need to ensure consistency to avoid unintended consequences for the delivery of masterplans.	The Council will seek to ensure that the Local Plan and Euston Area Plan are consistent and compatible and that cumulative impacts are considered.	No change proposed.
There is limited detail regarding the scale of opportunities at Euston. Opportunities at Euston should be more explicitly referenced due to its critical importance.	We propose to update the Plan to include a policy for the Euston Area.	Change proposed.
To note that, as stated in the NPPF; sport facilities should be protected unless they are surplus to current or future needs, replaced or lost to another sport facility the benefits of which outweighs the harm caused by the loss.	Comment noted.	No change proposed.
New housing generates demand for sports facilities. Where existing	Draft Local Plan policy SC2 (Social and Community Infrastructure)	No change proposed.

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facilities do not have capacity, policies should be applied to secure new or improved facilities through planning obligations or CIL.	states that the Council will seek planning obligations to secure contributions towards new and improved facilities and services to mitigate the impacts of development.	
There is concern that the site allocations (except N2, Mansfield Bowling Club) do not identify any locations for new sports/ community facilities. As per comments on SC3, the Council's evidence base in this regard needs to be updated.	The site allocation policies for the O2, Regis Road and the Murphy site include requirements for the provision of new or improvement of existing community facilities (which would include sports facilities). On other sites, given their size and location, it is likely that where required, a contribution will be sought to the improvement of existing sports facilities in line with Policy SC2 Social and Community Infrastructure, rather than seeking provision on-site. The Infrastructure Delivery Plan identifies where new sports provision is planned in Camden over the Plan period.	No change proposed.
To note that the proposals map referenced at para 11.6 regarding 4 new SINCs does not appear to be available. The Council should provide this map and label clearly.	An updated Policies Map will be published as part of the Reg 19 consultation on the proposed submission version of the Local Plan.	No change proposed
Summary of key aspects of the plan on which UCL wish to comment: 1 Support of educational uses. 2 Support for student accommodation. 3 Consideration of tall	Comment noted. Responses to detailed comments are included under the relevant chapter.	No change proposed

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buildings policy. 4 Consideration of site allocations. 5 Importance of sustainability.		
The Trust owns and manages the Regent's Canal and its towpath, which is 6th busiest recorded on the national network in 2023. It is an important resource for visitors and residents. The Trust would welcome reference to the Canal and River Trust being owner and guardian in the Local Plan document, as well as a signpost for proposed waterside developers to benefit from free pre-app advice: https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-were-interested-in/pre-application-advice	There is a section on the Regents Canal in the supporting text to Policy NE1 Natural Environment. We propose to update the supporting text to state… Developments that come forward in proximity to the Regents Canal should consult with the Canal and Rivers Trust at an early stage in the planning application process.	Change proposed
To note the need for effective enforcement of consents and planning conditions. A huge sense of unfairness is felt by the local community when developers treat law, policy and conditions imposed with contempt and without sanction from the Council. If conditions cannot be enforced, consent should be refused.	In accordance with para 55 of the NPPF, planning conditions must be necessary, relevant, enforceable, precise and reasonable. The Council will only impose conditions which meet these requirements. The Local Plan does not cover the matter of enforcement, however we have shared this comment with the council's Planning Enforcement Team.	No change proposed.
Noting the importance of the Museum locally, nationally and	Support welcomed.	No change proposed.

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internationally; with expectations to address challenges faced with regards to sustainability of the Bloomsbury Estate and gallery display spaces, and the work ongoing with the council relating to the Bloomsbury Visions development. The BM is broadly supportive of the emerging draft objectives and principles coming out of the vision.		
Potential impacts of building heights on heritage assets should be given meaningful consideration during assessment of suitable capacity. Further advice can be found at: • The Setting of Heritage Assets historicengland.org.uk • The Historic Environment and Site Allocations in Local Plans historicengland.org.uk	Comments noted.	No change proposed.
General support for details relating to heritage assets potentially affected by developments within site allocations, however it is also suggested to include reference to any relevant conservation area appraisal.	Where site allocations fall within a conservation area, these are identified within the site allocation policy. It is therefore not considered necessary to also include a reference to the relevant conservation area appraisal or management plan.	No change proposed.
There is much to welcome in the draft document with regard to the management of potential impacts on	Support welcomed.	No change proposed.

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heritage of the borough. (Particularly; the strategic objective on page 16, related DS1 part A i), and broad thrust of policy D5. Further comments are provided). Nevertheless, there are certain areas of the draft Plan that we consider could be further strengthened and clarified in order to achieve the positive strategy for the historic environment as required by the NPPF.		
There is much to welcome in the draft plan and its focus on high quality design. Nevertheless, given the concentration of heritage and historic character across the borough, we consider there could be a greater alignment with the NPPF in its approach to the historic environment – a term that is largely absent within the consultation document. Greater emphasis on heritage significance in key sections of the plan would help ensure appropriate consideration of potential impacts. For example, we would suggest that reference to heritage significance should be made in policies DS1 (Delivering Healthy and Sustainable Development) and D1 (Achieving Design Excellence) in order to set the tone that its conservation is one of the	We propose to amend the plan to make greater reference to the historic environment and heritage significance in response to these comments, to ensure our approach to the historic environment is in line with the NPPF.	Change required.

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key objectives of the draft Plan. Similarly, cross-references to the importance of considering impacts on the historic environment could be made within other policies with potential implications – for example CC2, D3 and D4 all of which could have significant effects.		
There is concern for treatment of Highgate as half a village given its position astride two local authority boundaries. Both Camden and Haringey should liaise on issues relating to the whole of Highgate Village.	The Council have engaged with Haringey planners during the preparation of the draft local plan. Both Camden and Haringey have adopted the Highgate Neighbourhood Plan, prepared by the community, which sets out planning policy for the Highgate area across LPA boundaries. Any other engagement is outside of the scope of the local plan, however the council shall continue to work with neighbouring boroughs where appropriate.	No change proposed.
Suggestion for specific policy on 'Community Consultation' to emphasise the importance of pre-application engagement with the local community in accordance with para 137 of the NPPF regarding early discussions between interested parties and stakeholders.	The Council's Statement of Community Involvement sets out how we will consult with the community on planning issues: Other planning policy and guidance - Camden Council In addition, new draft Local Plan paragraphs 12.9 - 12.11 set out the Council's expectation that applicants engage with local communities on the design of schemes.	No change proposed.

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Concern for apparent lack of transparency around conservation committees with a suggestion that; All conservation committees should post online details of their meetings (time, location) and notes from their meetings. Committee members should be publicly listed and there should be term limits on how long a committee member can remain. The process for electing committee members should be made public.	The Council's Statement of Community Involvement sets out how we will consult with the community on planning issues: Other planning policy and guidance - Camden Council The operation of CAACs is not a matter for the Local Plan. However, this comment has been passed to colleagues in the DM service who are in the process of updating the terms of reference for CAACs in the borough.	No change proposed.
Concern that planning approvals are sometimes based on the action of others, with a suggestion that Planning permission (whether in a conservation area or not) should be based on the suitability of the individual application and not conditional on other property owners making the same decision at the same time.	Policy D4 sets out the Councils approach to extensions and alterations to existing buildings. It supports residents to alter and extend their own homes subject to meeting the criteria set out in the policy. In some circumstances extensions and alterations can be undertaken without needing to apply for planning permission however, as they are considered to be 'permitted development' under national planning rules. Where an application is required, each application is assessed on a case-by-case basis.	No change proposed.
Reference should be made to the challenge	Tourism is addressed in the introductory section 'The Challenges We	No change proposed.

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posed by mass tourism: Camden Lock/ Market	Face' as well as elsewhere in the document. It is noted within the plan that visitors require appropriate management to ensure that there is no harmful impact on local residents. This includes siting visitor accommodation in suitable locations. The Council has also recently adopted an Evening and Night-time Economy Strategy developed in conjunction with the citizen's assembly of residents, visitors, workers and businesses.	
There are opportunities for biodiversity improvements in Central Camden and Camden Square. Camden Square LTN should be made permanent with public realm improvements and greening.	Comment noted. This comment has been passed on to colleagues in the council's transport team.	No change proposed.
Broad support for the local plan.	Support welcomed.	No change proposed.
Close the streets around Camden Lock to traffic.	The Council has recently consulted on proposals to create a motor traffic free section of Camden High Street.	No change proposed.
Very laudable indeed. Let's hope all objectives are met.	Support welcomed.	No change proposed.
Consider introducing "Free Towns" where local people provide key services: housing, education, safety, waste disposal, transport and	This is not a matter for the local plan.	No change proposed.

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health - within the context of national and global perspectives. So not parochial, but genuinely promoting local democracy, so that I know who is delivering services for me and can see them operating or meet them easily. This is aiming to renew our democratic (which is chronically oligarchic) from the roots-up.		
Kilburn High Road seems to have been ignored. This is one of the most important centres and should be made more attractive for pedestrians.	Camden, Brent and Westminster councils are working together to make Kilburn Town Centre a more enjoyable area to walk, cycle and shop and have recently consulted on proposals to achieve this. Kilburn High Road is a designated town centre in the Local Plan and is covered by policy IE6 (Supporting town Centres and High Streets) and policy W1 (West Camden).	No change proposed.
Kilburn High Road is a historic area that you have ignored. It has a rich cultural and musical history and this should be recognised in your plan.	Kilburn High Road is a designated town centre in the Local Plan and is covered by policy IE6 (Supporting town Centres and High Streets) and policy W1 (West Camden). Camden, Brent and Westminster councils are working together to make Kilburn Town Centre a more enjoyable area to walk, cycle and shop and have recently consulted	No change proposed.

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	on proposals to achieve this.	
Kilburn High Road has potential to be improved for the benefit of a wide catchment area of the community (fresh food, social and active travel opportunities for car-free days, storage space to replace parking).	Camden, Brent and Westminster councils are working together to make Kilburn Town Centre a more enjoyable area to walk, cycle and shop and have recently consulted on proposals to achieve this. Kilburn High Road is a designated town centre in the Local Plan and is covered by policy IE6 (Supporting town Centres and High Streets) and policy W1 (West Camden).	No change proposed.
I have already made a comment. Camden council makes no attempt to consult with local people. It's a tick box exercise and then they go and do whatever they want.	Comment noted.	No change proposed.
Why build MORE houses. The ones Camden have are left empty.	The Plan seeks to deliver more homes to meet Camden's housing need, in line with national and London wide policy. Empty homes are not a matter for the Local Plan.	No change proposed.
Camden should roll out double glazing and insulation for homes. Cycle lanes waste money and hold up public transport congesting the roads causing more pollution.	The Council is carrying out a programme of retrofit works over the coming years to make council homes more energy efficient.	No change proposed.

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The Council should focus on delivery of services for the people of Camden.	Comment noted.	No change proposed.
Consider supporting a Universal Basic Income to ensure equity, inclusion and diversity - paid for by Land Value dividend (land value is levied for local government).	Comment noted.	No change proposed.
All nice statements but where is the funding? How are these objectives to be achieved?	Information on the delivery of the plan is set out in Chapter 15 - Delivery and Monitoring.	No change proposed.
Tall buildings should not be considered as the best way to achieve greatest density. Tall buildings create wind canyons and age badly. Towers are not wanted and policies should be worded to clearly state this.	Draft Local Plan policy D2 sets out our approach to tall buildings, which sets out the criteria against which they will be assessed.	No change proposed.
Support for the majority of proposals, but concern that developments may be approved due to CIL money the Council will receive.	Support welcomed. CIL contributions are not a material consideration in planning decisions.	No change proposed.
General support for proposals for the local community, with suggestion for additional consideration of health assistance and training programmes.	Comment noted.	No change proposed.
Support for parks and greenery with benefits for physical and mental health. Also strong support for food growing.	Comment noted.	No change proposed.

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Noting plans for reducing pollution and air quality improvement.	Comment noted.	No change proposed.
Consideration should be given to elderly people and people with disabilities, avoiding steps, uneven/ slippery flooring. Comfortable seating, accessible toilets. Buildings should be adaptable.	Draft policy D1 specifically states that the Council will require that development meets the highest practicable standards of accessible and inclusive design. The Plan seeks the provision of publicly accessible toilets in appropriate developments and locations.	No change proposed.
To note the open space at Swiss Cottage, behind the library and gym.	Comment noted.	No change proposed.
Support for emphasis on biodiversity, climate change and high design standards.	Support welcomed.	No change proposed.
The consultation is too complicated and difficult to read. The main points should be highlighted.	Comments noted. We will look to publish a summary of the Plan, the next time we go out to public consultation.	No change proposed.
Dissatisfaction with Camden consultation processes.	Comments noted.	No change proposed.
General support.	Support welcomed.	No change proposed.
This is what the community needs, more housing and access to more jobs.	Comment noted.	No change proposed.
Please continue green strategies and safe cycling	Comment noted.	No change proposed.

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General support, with suggestion for a 'waste tax' on empty property.	Support welcomed. A tax on empty property is not a matter for the Local Plan.	No change proposed.
Kilburn High Road needs attention to attract higher quality businesses, improve social interaction and reduce conflict between people in the areas and people who drive through the area without adding value there.	Camden, Brent and Westminster councils are working together to make Kilburn Town Centre a more enjoyable area to walk, cycle and shop and have recently consulted on proposals to achieve this.	No change proposed.
You lack a strategy for Kilburn High Road area. You should be encouraging car free development, active travel, car clubs, higher quality office space along the road, and a better environment along the high road.	The draft new Local Plan expects all new development to be car-free and promotes active travel and public realm improvements. Camden, Brent and Westminster councils are working together to make Kilburn Town Centre a more enjoyable area to walk, cycle and shop and have recently consulted on proposals to achieve this.	No change proposed.
Being able to access all community services on foot should be more prominent in the plan.	Chapter 14 of the new draft plan seeks to ensure safe, healthy and sustainable travel, including prioritising walking, wheeling and cycling. The Plan expects new, improved and extended community facilities to be accessible for all.	No change proposed.
Dissatisfaction with house building opposed by local residents, and empty properties. Camden builds unwanted cycle lanes and concrete flats	Comments noted.	No change proposed.

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replace trees. Kentish Town Road is a mess. Dog walkers disturb the peace on Hampstead Heath.		
More housing is needed.	The Council aims to deliver over 11,000 homes over the Local Plan period. Housing is the priority land use of the Plan.	No change proposed.
Prioritise walking and cycling over motor vehicles.	Chapter 14 of the draft plan outlines the Council's approach to Safe, Healthy and Sustainable Transport, which includes the prioritisation of walking, wheeling, and cycling over motor vehicles as suggested.	No change proposed.
I agree with strategy. Whether it will be implemented or not is another matter	Comments noted.	No change proposed.
I hope lots of land will be used for leisure, sport and activities for the young	Comments noted.	No change proposed.
Infrastructure planning must consider the requirement for vehicular access both for safe and accessible transport options and delivery vehicles. This is especially important for women travelling at night. The LTNs have stopped Ubers access to many quiet roads now which makes coming home at night dangerous. So future planning needs to	Low-Traffic-Neighbourhoods are part of the Council's wider transport strategy and not a matter specifically for the local plan. We have passed these comments on to the Transport team.	No change proposed.

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consider the safety of female residents in particular.		
Concerns for proliferation of new undesirable buildings/ student accommodation and changing housing into hotels with lack of infrastructure. None of the housing is for poor working class people. Existing housing stock is not well maintained.	Comments noted.	No change proposed.
Consultation information is written in a biased way.	Comments noted.	No change proposed.
Camden desperately needs to introduce healthy school areas. The volume of traffic and cars around schools is unacceptable.	Comments noted. This is not a matter for the local plan. The Council has introduced over 30 Healthy School Streets to date and is trialling more.	No change proposed.
We should build more high quality housing. Financed without borrowing money to construct mixed use properties to enable a return on the investment for the benefit of the local authority. New homes should have solar roofs and be 'passive' houses. Social rents should be low to maintain the building, not to make profit.	The building of homes by the council is not a matter for the local plan.	No change proposed.
Scepticism about Camden's commitment to sustainability and net zero carbon emissions, especially in relation to	The draft Plan outlines the council's commitment to tackling the climate emergency and promoting sustainability. As per draft	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
site allocations. Doubts are reinforced by planning committee decision for One Museum St/ Selkirk House despite huge local opposition.	policy CC2 – Retention of existing buildings. Retention and retrofit schemes are prioritised over demolition and re-build, however there will be circumstances where demolition is acceptable, but only where the criteria set out in the policy are met.	
Scepticism about the Council's support for local residents and communities in the Holborn area or ability to conserve the historic environment. Recent decisions such as Museum Street and Great Ormond Street demonstrate that neither officers nor committee members give priority to residential amenity or the harm to heritage when considered against purported public benefits. No evidence that the new plan will change this. A stronger requirement to retrofit, to prevent unnecessary demolition is needed. Offices deemed unsuitable for commercial use should be converted to housing to strengthen local residential communities and to support local services.	Draft plan policies in relation to Design and Heritage, and also Responding to Climate Change will ensure that retention and retrofit schemes are prioritised over demolition and re-build. For example, demolition will only be acceptable where the criteria set out in policy CC2 – Retention of existing buildings are satisfactorily met.	No change proposed.
Whilst the Mary Ward Centre is outside of the Campus area, it is disappointing that it has	Comments noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
been allowed to change its use to medical. The historic buildings have been in continuous educational use since 1861, with access to a wide section of the public.		
No more student housing in Somers Town. Transitory populations do not aid community.	Local Plan policy H9 states that student housing should not create a harmful concentration in the local area or cause harm to nearby residential amenity. We will assess proposals for student housing having regard to any existing concentrations in the area.	No change proposed.
Heritage is important. Historic buildings should not be pulled down. New developments should occur on brownfield sites. The London School of Mosaic is in Gospel Oak, mosaic should be used in the public realm.	Policy D5 (Heritage) seeks to protect designated heritage assets in Camden.	No change proposed.

Chapter 1 - Introduction

In total **32** representations were made on Chapter 1 Introduction. Of these, **16** representations were received via commonplace and **16** representations were received via email.

Responses were received from the following consultees:

- Covent Garden Community Association (CGCA)
- Kentish Town Neighbourhood Forum (KTNF)
- The Fitzrovia Partnership
- Camden Town Unlimited
- Dartmouth Park Neighbourhood Forum
- Canal and River Trust
- Eton Conservation Area Advisory Committee

- Sport England
- Royal Mail Group
- Members of the public

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Add 'Seven Dials' to the list of Camden's attractive and historic neighbourhoods.	Para 1.41 is not an exhaustive list of all Camden's historic areas, but mentions some areas as examples. The additional wording proposed is not considered necessary.	No change proposed.
Welcome the ambitious Vision and Objectives set out in Camden Council's draft new Camden Local Plan.	Support welcomed.	No change proposed.
Welcome that the draft Plan supports several priorities in the Kentish Town Neighbourhood Plan.	Support welcomed.	No change proposed.
KTNF notes that it will not be easy to achieve the Vision and Objectives and to overcome the challenges identified in the draft against the background of the current economic climate, the forthcoming changes in national planning policy and the Mayor of London's priorities.	Comments noted.	No change proposed.
The effectiveness of the draft plan could be improved by emphasising at the beginning that the Local Plan is intended to be implemented holistically, rather than piecemeal, illustrated by more mutually supported cross-referencing to emphasise and make explicit where one spatial	We propose to update the Plan to make clear that it should be read as a whole and included more cross references where appropriate within the document.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
or thematic policy and strategy supports another.		
It would also be useful to avoid contradictions in the draft Local Plan. For example, locations where tall buildings may be an appropriate form of development are identified on Map 13 below and listed in Appendix 2. Yet, the construction of tall buildings inevitably involves massive quantities of concrete and steel, whose production is a proven major contributor of greenhouse gases. This directly contradicts the ambitions of Policy CC1 - Responding to the climate emergency.	The London Plan requires boroughs to define what a 'tall building' is for specific localities and identify locations where tall buildings may be an appropriate form of development in Camden. Policy D2 tall buildings does state however that in determining applications for tall buildings the Council will give particular attention to whether the proposal maximises energy efficiency and resource efficiency in accordance with Policies CC3, CC4, CC5 and CC6 in the Climate Change Chapter.	No change proposed.
While currently not offering significant new development opportunities, Fitzrovia can remain an important contributor to the growth of Camden's wider economy and the creation of skilled, well-paid jobs. However, without policy and practical support and investment, Fitzrovia risks not fulfilling its potential. We are encouraged by Fitzrovia's designation as a Neighbourhood Plan area and would be delighted to contribute to	Comments noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
the development of a Neighbourhood Plan, working with local residents and businesses.		
Recommend mentioning BIDS (Business Improvement Districts) as strategic partners in this section and for Camden Council to proactively engage with Business Improvement Districts to deliver the Council's Vision and objectives where appropriate through partnership work.	It is not considered that this additional wording is necessary.	No change proposed.
There is not a single word about "efficiency" use of resources and not a single word about "cost-effective" to support a "sustainable" future development in the introduction.	Reference to the need to deliver sustainable development that minimises the use of resources is included in the introduction chapter and elsewhere in the Plan. A Viability Study of the Plan has been carried out which assesses the viability impacts of emerging plan policies The Plan acknowledges the need to consider the viability when assessing development proposals.	No change proposed.
The language used in the Local Plan on the application of Neighbourhood Plan policies must be much more prescriptive and less ambiguous than is currently the case.	The Plan states that Neighbourhood Plans set out the communities' visions for designated neighbourhood areas, and include a range of planning policies, which are used alongside the Council's own adopted policies when making planning decisions in the neighbourhood areas. No amendment to the wording of the Plan is considered necessary.	No change proposed

The challenges we face

Summary of Key Points	Council's Response	Proposed Changes to the draft Local Plan
We understand there have been national legislation changes, which bring this outside of Planning regulations. Thus, it may not be entirely within Camden's control to meet the objectives in their plan regarding a balanced mix residential and economic centres, etc. However, we understand that this document will become an official document against which all planning applications will be measured. So we are concerned that there is no mention of the relationship of Planning Applications relating to change of use applications.	Where planning permission is required for a change of use then the policies in the Plan will apply. If planning permission is not required and the work can be undertaken as 'permitted development' then it is not a matter that the local plan can control.	No change proposed.
The Canal can be a hugely valuable asset for improving health and wellbeing in the borough.	Comments noted	No change proposed.
New development should not just 'respect' (para 1.41) this 'character, heritage and distinctiveness. It should be amended to include: *"…safeguard and promote it as an integral part of Camden's future and prosperity."*	The Plan's detailed approach to heritage is set out in policy D5. This states that the Council will conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings. The policy is considered to align with the wording in the NPPF. Additional wording in paragraph 1.41 is not considered necessary.	No change proposed.
Under 'Responding to the climate and ecological	We propose to update this section to refer to the	Change proposed.

emergency' there's no reference to the borough's ecology, the need to conserve and enhance the key biodiversity that also reside or visit the borough, and the role of a high quality natural environment in helping to make parts of the borough adapt to and help make more resilient to the impacts of climate change.	need to respond to the ecological emergency.	
From 2021 census there are 15,600 unpaid carers in Camden. Over 3500 care unpaid for 50 hours+ a week. Please remember to think of unpaid carers when designing services. Unpaid carers save the borough millions of pounds each year.	Comments noted. This comment covers matters outside of the scope of the Local Plan. We have shared them with the relevant Council service.	No change proposed.
It is important to recognise that there are attractive and historic neighbourhoods which are not listed above. Crime is certainly a serious issue, and designing out crime by including sight lines that allow public scrutiny of anti-social activities is important. It is true, as you argue that "Many people want to live in Camden but there is a limited supply of homes and prices are high." At the same time it is impossible for Camden to house everyone who wishes to live here. This needs to be explicitly recognised in the report.	Comments noted. The aim of this section of the Plan is to highlight some of the key challenges and issues facing the borough that we need to address in our planning policies. More detail on particular issues is included in the topic specific plan sections. It is not considered that additional wording is necessary.	No change proposed.

A balance has to be maintained between the lives of existing residents and those who wish to become residents.		
Shaping "look and feel" heavily dependent on protection of heritage buildings and open spaces/private gardens/biodiversity. None mentioned above.	The issues of heritage, open spaces, private gardens and biodiversity are dealt with by policies within the Local Plan.	No change proposed.
"Attractive" historic neighbourhoods and parks/open spaces are to be respected by new development. Is that the same as conservation and protection? In the past these kind of warm words have been shown to pay lip service to the reality.	Draft Local Plan Policy D5 Heritage sets out the Council's detailed approach to the conservation of heritage assets in Camden.	No change proposed.
Object to the inclusion of short term lets in larger developments, as it doesn't create mixed and balanced communities.	Comments noted. The Draft Plan seeks to resist the development of sites for permanent short term let housing, unless it can be evidenced to the Council's satisfaction, that the site is unsuitable for the provision of permanent self-contained housing.	No change proposed.
Just focus on realistic goals for recycling & reuse and make smart choices for public spaces. We are not going to be 'tackling the climate emergency' anytime ever. But you can give us decent recycling systems and rubbish collection rather than simply	Comments noted. This comment covers matters outside of the scope of the Local Plan. We have shared them with the relevant Council service.	No change proposed.

outsourcing to a company. You want people to be growing green spaces in Camden? Then encourage them to do so - don't start charging for green waste collection and force them to get in the car to take it to be recycled.		
Putting cycle lanes behind the bus stops is impractical and dangerous.	Comments noted. This comment covers matters outside of the scope of the Local Plan. We have shared them with the relevant Council service.	No change proposed.
Supporting Camden's centres This is crucial and should be far higher on the agenda than 'tackling the climate emergency' Rates are completely out of proportion and parking near to local shops in Camden becomes ever more difficult	Comments noted. The issues facing Camden are not listed in order of priority. Where comments are not a matter for the Local Plan we have shared them with the relevant Council service.	No change proposed.
'Therefore, it is even more crucial that the Local Plan aids achieving equitable outcomes in Camden for all.' What does this mean in practice	The Local Plan is a key mechanism for delivering the Council's corporate strategy. The Plan seeks to deliver new homes, jobs, and infrastructure, whilst seeking to ensure that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents	No change proposed.

Vision and objectives

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Sport England supports the ambitions set out with in the Local Plan.	Support welcomed.	No change proposed.
Suggest the following amendments - 'To promote health and well-being and reduce physical and mental health inequalities through good design and place making; improving access to nature; enabling affordable healthy food choices; supporting people to lead healthy and active lifestyles; and improving access to healthcare and sport facilities.'	We propose to update the Plan to reflect the proposed amendment.	Changed proposed.
The draft Local Plan seeks to deliver on Camden's corporate ambitions in "We Make Camden" and sets out strategic objectives and vision for development in the Borough which we support.	Support welcomed	No change proposed.
More emphasis should be given to Camden's heritage and the part it can play in Camden's Vision, Strategic Objectives and planning strategy for the future. At present, it lacks reference to the importance of Camden's rich 'built (and unbuilt – parks and squares) heritage'; to Its iconic buildings and spaces, historic character, culture,	A number of references are made to Camden's heritage in the introduction and throughout the Local Plan as a whole. No additional wording is considered necessary.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
attractiveness and contribution to economic prosperity (tourism), education, health and overall well-being, and the importance of safeguarding and promoting this heritage for future generations as a place as a place to enjoy, live, work and visit.		
This includes the mission: "By 2030, Camden's estates and their neighbourhoods are healthy, and sustainable and unlock creativity." Whilst the draft document goes on to explain approaches to the attainment of healthy and sustainable neighbourhoods, perhaps the idea of "creativity" needs more development.	This is a reference to the missions set out in the Council's Corporate Strategy: We Make Camden. Further detail on the Council's missions is set out in that document. It is not considered necessary to add additional wording into the Local Plan.	No change proposed.
Replace "genuinely affordable homes" (which means nothing as it stands) with "Social Housing".	The supporting text of policy H4 maximising the supply of affordable housing explains the meaning of affordable housing in the context of the Local Plan and the London Plan. Given this it is not considered necessary to amend the wording in objective 2 of the Local Plan.	No change proposed.
"High Streets" must be included in this objective.	High streets are covered by the reference to 'designated centres', which reflects the designations in the Local Plan.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The Council needs to work with TFL to maintain the upkeep of main roads long term.	Comment noted. This comment covers matters outside of the scope of the Local Plan. We have shared them with the relevant Council service.	No change proposed.
Support the Vision and the Strategic objectives, especially 1, 6, 8 and 9.	Support welcomed	No change proposed.
Nothing about looking after what we already have. The emphasis is entirely on development with nothing on the stewardship of the historic built environment. The use of the word "respect" is verging on the disingenuous. Why not be clear and use "protect" and "conserve"?	We propose to update Local Plan objective 6 to refer to the need to respect and conserve the unique character and history of Camden's neighbourhoods. The Plan's detailed approach to heritage is set out in policy D5.	Change proposed.

Chapter 2 - Development Strategy

In total **87** representations were made on the Development Strategy Chapter. Of these, **13** representations were received via commonplace and **74** representations were received via email.

Responses were received from the following consultees:

- Belsize Parkhill and Elsworthy Conservation Area Advisory Committees
- Bloomsbury Conservation Area Advisory Committee
- British Land
- Camden Town Unlimited (CTU)
- Covent Garden Community Association (CGCA)
- Eton Conservation Area Advisory Committee
- Greater London Authority (GLA)
- Hilson Moran
- Home Builders Federation
- Kentish Town Neighbourhood Forum (KTNF)
- LabTech
- Lendlease and Euston landowners
- London Property Alliance
- LS Finchley Road Ltd

- Network Rail
- NHS Healthy Urban Development Unit (HUDU)
- Primrose Hill Conservation Area Advisory Committee
- Royal Free London NHS Foundation Trust
- Royal London Asset Management
- Royal Mail Group (RMG)
- Sport England
- St George West London Ltd
- Students' Union UCL
- Woodland Trust
- Members of the public

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Figure 2. Haverstock Hill South of Old Town Hall retail area should be included.	The Key diagram is a high level strategic map which is intended to show key areas of development in Camden. It would not be appropriate for the key diagram to show every neighbourhood centre.	No change proposed.
Para 2.25 - Excellent work has been done by council officers in Agar Grove and West Kentish Town estate. It would be helpful to refer applicants to schemes like these which add social value.	Comment notes. No additional wording in para 2.25 is considered necessary.	No change proposed.
Agree that there should be strong support for delivering new development within the Central Activities Zone.	Support welcomed.	No change proposed.
Figure 2 illustrates the overall spatial strategy for Camden. This should highlight the Knowledge Quarter Innovation District.	The key diagram shows areas designated in the Local Plan. The Knowledge Quarter is not a designated area and is therefore not shown.	No change proposed.
The importance of the Knowledge Quarter in Camden should be emphasised in a stand-alone Knowledge Quarter policy within the draft Plan.	The role of The Knowledge Quarter is located in the south of the borough. It is therefore identified in Policy S1 for the South Area and in the supporting text. An additional stand-alone	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	policy is not considered necessary.	
Update this section to refer to Business Improvement Districts as a strategic partner.	Chapter 2 of the Plan sets out the overarching development strategy for Camden, in terms of the quantum and spatial distribution of development to be delivered over the Plan period. The chapter does not refer to who the Council will engage with as part of the planning application process. This is instead set out in the Council's Statement of Community Involvement. It is not considered necessary to add additional wording to this chapter.	No change proposed.
The diagram is very low res and can't see or read the detail also not accessible	Comment noted. We are proposing to replace the maps in the next version of the Plan, with better quality maps.	Change proposed.
This seems like a very unambitious goal. 12k homes over more than a decade is very slow progress when housing prices are crippling the financial future of generations. The biggest barriers to housing construction are regulatory. Why can't Camden council build more homes and make it easier for the private sector to build more?	Comment noted. The housing target in the Plan is a capacity based target and reflects the limited availability of land in Camden. The Local Plan includes a number of measures to support the delivery of housing in Camden and the Council's CIP Team proactively work to delivery new and improved housing in the borough.	No change proposed.
What is the importance of the "Town Centres" designation? Why aren't other major town centres recognized e.g. Belsize Village, England's Lane	Comment noted. Larger centres in Camden, with wider catchment areas are designated as town centres. Smaller centres, such as those mentioned,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
and Regent's Park Road in Primrose Hill? Each of these places serve a vital function for people living in the neighbourhood.	are designated as neighbourhood centres.	
Dividing the borough up may help with coping with the amount of work, but you need to avoid duplication of administration. Where possible Camden officers should be involved with hands-on delivery of services, not located in a central office where they may end up building a little empire and competing with each other - Wasting everyone's time and money.	Comment noted.	No change proposed.
Is there anywhere this map can be viewed clearly as this is too blurred to be readable?	Comment noted. We are proposing to replace the maps in the next version of the Plan, with better quality maps.	Change proposed.
Is 1000 odd homes a year enough?	Comment noted. The housing target in the Plan is a capacity based target and reflects the limited availability of land in Camden. The Local Plan includes a number of measures to support the delivery of housing in Camden	No change proposed.
You have not stated how many of the 10,000 odd new homes to be built by 2028/29 will be affordable, therefore we have no way of estimating whether you might be on target for that measure. Similarly, you have stated your intention to deliver	The provision of affordable homes is considered on a site by site basis and therefore it is not possible to accurately say how many affordable homes will be built in future years.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
3,000 affordable homes between 2026/27 - 2040/41, but you have not given an overall figure for the number of homes you intend to build in that period. Please provide complete information that allows your performance & plans to be properly scrutinised against the standards & targets you claim to be working to.		
HUDU welcomes this approach but asks that the Council makes provision for changing health priorities and demands over the plan period.	Chapter 2 of the Plan sets out the overarching development strategy for Camden, in terms of the quantum and spatial distribution of development to be delivered over the Plan period. The Local Plan identifies where new health facilities are required to support local communities. The NHS will continue to be consulted on planning applications and will have the opportunity as part of that process to express where requirements may have changed. No change to wording is therefore considered necessary.	No change proposed.
Affordability and sustainability of health sites and floorspace are vital and any potential new capacity will need to meet these requirements. Therefore, the expansion of capacity within existing health sites is often the preferred solution with developers' contributions	Comment noted	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
secured to ensure this can happen in parallel with the new population arriving. However, sometimes the favoured approach is for new premises.		
We agree that there should be strong support for delivering new development within the Central Activities Zone, growth areas, town centres and other major development locations within Camden. Given the Borough's central London location, we consider that the whole Borough ought to be considered capable of delivering new development, in principle.	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.
Suggest that a further paragraph is added below Figure 2 – Key diagram to state "Whilst the key diagram identifies the areas of main focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to meeting the necessary policy requirements of this Local Plan".	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.
Given the Borough's central London location, we consider that the whole Borough ought to be considered capable of delivering new development, in principle.	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	wording is considered necessary.	
Suggest that a further paragraph is added below Figure 2 – Key diagram to state "Whilst the key diagram identifies the areas of main focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to meeting the necessary policy requirements of this Local Plan".	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.
Given the Borough's central London location, we consider that the whole Borough ought to be considered capable of delivering new development, in principle.	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.
Suggest that a further paragraph is added below Figure 2 – Key diagram to state "Whilst the key diagram identifies the areas of main focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to meeting the necessary policy requirements of this Local Plan".	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The importance of the Knowledge Quarter in Camden should be emphasised in the draft Plan.	The role of the Knowledge Quarter in Camden is identified in Policy S1 - South Area and its supporting text.	No change proposed.
Suggest that a further paragraph is added below Figure 2 – Key diagram to state "Whilst the key diagram identifies the areas of main focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to meeting the necessary policy requirements of this Local Plan".	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.
LBC contains three Opportunity Areas identified in the London Plan at Tottenham Court Road, King's Cross and Euston. The draft Plan states that both Tottenham Court Road and Kings Cross are largely complete and there is unlikely to be significant further development in the plan period.	Comment noted	No change proposed.
It is recommended that the draft Plan provides an outline of what is expected to come forward in the Euston Area with indicative capacities and a clearer definition of the boundaries of the Opportunity Area. This will help to reflect the importance of the Euston Area in the overall	We propose to update the Plan to include a policy for the Euston Area.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
strategy and provide a certain level of clarity while the Area Plan is being developed.		
Within LBC is an area of the Central Activities Zone (CAZ), as defined in Policy SD4 of the LP2021. Part N of Policy SD4 sets out that Development Plans should look to define the boundary in detail and included on policy maps. As per Policy SD5 of the LP2021, the draft Plan should ensure that residential development within in the CAZ does not compromise the strategic uses as set out in paragraph 2.4.4 of the LP2021. Part G of SD5 also sets out that any mixed-use development within the CAZ should not lead to a net loss of office floorspace and the use of land use swaps, credits and off-site contributions should also be explored as per Part H.	Comment noted	No change proposed.
The draft Plan identifies the need for 340,000sq.m. of office space over the plan period with 210,000sq.m. of this total already in the planning pipeline. Policy E1 of the LP2021 supports the development of new office space where there is demonstratable need, and it should be focused within the Central Activity Zone (CAZ), town centres and Opportunity	Comment noted. Policy S1 notes that the CAZ and will continue to be the main focus for employment development in Camden. However we consider it is appropriate for locations outside of the CAZ, Opportunity Areas and town centres to also include office space as part of mixed use development (e.g. in the KQ).	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Areas. The draft Plan and site allocations should reflect the focus of office into these locations in order to take advantage of existing infrastructure and connectivity and avoid allocations outside of these areas as the draft currently does.		
The Plan needs to set out how the backlog in supply accumulated since the London Plan came into operation as part of the development plan for London in 2018/19 will be addressed. While the annualised requirement might be for 1,038 homes a year, the requirement in the London Plan is for Camden to deliver 10,380 homes from 2018/19 to 2028/29. Consequently, it is necessary to look at what Camden has delivered in terms of net additions since 2018/19. HBF considers that the DLUHC Live Table 122 is the most authoritative source, since it uses nationally consistent criteria in terms of what it measures. It also provides the basis for assessment for the Housing Delivery Test. It is unclear from the draft local plan how the Council proposes to address the deficit when measured against the requirement in	The draft Local Plan set a target to deliver 11,550 additional homes over the plan period to 2041. This factors in the London Plan housing target for Camden of 1,038 homes per year for the first three years of the Plan period (2026/27, 2027/28 and 2028/29) and also includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period). Further information on the backlog will be set out in a Housing Topic paper that will be prepared to support the Plan at examination.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
the London Plan, and what it proposes will be done about the deficit that has accumulated. It would be unsound to simply ignore the backlog of homes. At the very least, we would expect this backlog accumulated against the London Plan to be reflected in the residual housing requirement for the local plan, addressed either over the first five years or spread out over the fifteen years. Of the two, the latter seems the only reasonable course of action in order to meet the London Plan target by 2028/29.		
The Council should aim to deliver the full London Plan requirement by 2028/29.	Comment noted	No change proposed.
As the recent review of the London Plan by the government concluded (*London Plan Review Report of Expert Advisers.* Commissioned by DLUHC 15 January 2024), delivery across London as a whole, and in most London boroughs, including Camden, is falling to keep pace with need and is falling behind significantly meeting the identified housing requirement.	Comment noted	No change proposed.
We are worried that the wording of these paragraphs [para 2.13 and 2.15], and the subsequent polices for	The Plan has been updated to take on board these comments and reference to directing development to the 'most	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
the sub-areas, may be read as only supporting new housing development in the 'most accessible and well-connected locations in Camden'. No area of Camden should be deemed unsuitable for residential development given the density of the public transport network. Owing to the density of historic environment designations, we acknowledge that residential development opportunities may be quite limited, but a more purposive strategy, one that encourages residential development opportunities in all parts of the borough, irrespective of a strict application of the London Plan policy guidelines, could help to improve housing delivery in Camden. As discussed above, housing delivery in Camden is falling woefully behind the London Plan target, so it will be necessary for Camden to change its approach. Relying on old policy principles will suffice no longer.	accessible and well-connected locations in Camden' has been removed.	
Recognition of policy approach.	Comment noted	No change proposed.
We recognise and support the importance of Camden's ambitions, alongside the relevant policies set out in the draft	Comment noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Local Plan, in contributing to and achieving the strategic objectives. However, we would question whether the direction of the draft Local Plan is sufficiently balanced so as to meet these wider objectives in a more equitable manner.		
Given the important social, environmental and economic benefits that can flow from employment generating development, we therefore suggest that the priority that the Council place on housing delivery, above the delivery other land uses, should be reconsidered, especially in South Camden, that benefits from individual sites are optimised, rather than compromised.	Given the scale of housing and affordable housing need in Camden it's appropriate for housing to be the priority land use in the Local Plan. That does not however preclude other development coming forward and we have allocated sites in the Plan for a mix of uses, not just housing.	No change proposed.
Given the Borough's central London location, we consider that the whole Borough ought to be considered capable of delivering new development, in principle.	The Plan has been updated to take on board these comments and reference to directing development to the 'most accessible and well-connected locations in Camden' has been removed.	Change proposed.
Suggest that a further paragraph is added below Figure 2 – Key diagram to state "Whilst the key diagram identifies the areas of main focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
meeting the necessary policy requirements of this Local Plan".		
Given the Borough's central London location, we consider that the whole Borough ought to be considered capable of delivering new development, in principle.	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.
Suggest that a further paragraph is added below Figure 2 – Key diagram to state "Whilst the key diagram identifies the areas of main focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to meeting the necessary policy requirements of this Local Plan".	The Plan sets out our overall approach to delivering new development in Camden and identifies key areas of development in the borough. This does not preclude development coming forward outside of these areas. No additional wording is considered necessary.	No change proposed.

Policy DS1 – Delivering Healthy and Sustainable Development

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support policy approach.	Support welcome	No change proposed.
Don't keep granting planning permission for basements to be built in areas prone to flooding, and particularly where the Fleet River ran.	Comment noted. Policy CC11 sets out the Council's approach to managing flood risk and Policy D6 sets out the Council's approach to managing basement development. Policy D6	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	require an assessment of a basement scheme's impact on flooding, drainage and groundwater conditions.	
Why do you allow so many trees to be razed to the ground?	Comment noted. Policy NE3 sets out the Council's approach to the provision and protection of trees in new developments. Where trees are lost as part of the development of a site, this is determined as part of a planning application, on a case by case basis, based on available evidence.	No change proposed.
Need to ensure that stations are made accessible.	Comment noted. Although Underground and Overground stations are owned and operated by TfL, the Council will continue to promote step free access at stations in Camden and the Plan seeks contributions from new development to deliver this where appropriate.	No change proposed.
Add the need for development to protect residents' need for rest and a good night's sleep as essential to their health.	Policy A1 protecting amenity and Policy A4 noise, seek to manage the adverse impacts of development on residents in Camden. No additional wording is considered necessary.	No change proposed.
The prioritisation of reuse over redevelopment should be included. Applications for demolition and new build should demonstrate that reuse has been properly assessed as an alternative.	Policies CC1 and CC2 in the climate section of the Plan seek to ensure that the repurposing, refurbishment and re-use of existing building/s is prioritised over demolition.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Policy DS1Ai - heritage should be referenced here to acknowledge its importance to communities. Revise '… respect local context; …' to '… respect local context and heritage; …'.	We propose to update Policy DS1 to also refer to heritage.	Change proposed.
Policy DS1Ax can be misinterpreted. 'Comprehensive development' has long been out of favour, invariably leading to extensive demolition and long-term vacancy – sites and buildings. It should be amended here and elsewhere in the Plan to say 'Ensuring that sites are designed and developed… *"…within the context of a comprehensive masterplan which allows and does not preclude appropriate incremental development and restoration/refurbishment of an area."*	Comment noted. We have amended the wording in relation to comprehensive development in Policy DS1 and the supporting text.	Change proposed.
Support policy approach.	Support welcomed.	No change proposed.
The policy should be strengthened by adding reference to urban hedgerows.	Comment noted. We have updated the wording of Policy DS1 to refer to urban hedgerows.	Change proposed.
Update para 2.19 to read… Where we live has a profound impact on our health and well-being, it is therefore important that new development ~~helps to improve~~ <u>prioritises improving</u> the built, natural and social environment in Camden	We propose to update the Plan to reflect the proposed wording.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
General support for policy approach	Support welcomed	No change proposed.
Policy DS1 should make specific reference to optimising site capacity.	Policy DS1 has been updated to refer to the need for developments to optimise the use of land in Camden and make best of a site.	Change proposed.
The priorities of part (iv) of draft Policy DS1 feel contradictory, with the Council requiring a mix of uses but stating that self-contained housing is the Council's priority land use. It is considered that this should be amended to read "Self-contained housing is the priority land use in the Plan. However, on appropriate sites, a mix of uses, services, facilities and amenities that meet the needs of the local community and are easily accessible on foot, by bike and via public transport, will also be supported".	We do not consider it contradictory that the plan states that housing is the priority use of the plan and also supports a mix of uses. This is the approach taken in the current adopted local plan. No change is proposed.	No change proposed.
Draft Policy DS1 part (b) and paragraphs 2.27 and 2.28 require major applications to contribute financially to Camden's Citizen Scientist community research programme. This should be removed.	The Citizens Scientist programme has been designed to empower communities to lead change through social action and shape policies that impact their lives. The Citizen Scientist's research will be used to inform a variety of strategies and projects that will help ensure that the right infrastructure is provided to support growth and development in the borough. For example, their research will inform the preparation	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	of masterplans and frameworks, development proposals and the work of the Area Regeneration Team. This is already being demonstrated in Euston, where the Euston Voices researchers have been paid and trained as Citizen Social Scientists to identify what the local priorities are for their community to prosper whilst major regeneration is underway. It is considered that the requirement meets the tests required for Section 106 (S106) obligations.	
The emerging local plan needs to acknowledge case law to ensure multi-phase regeneration schemes are able to respond to changing commercial circumstances, with particular regards to long term plans at Euston.	Comments noted.	No change proposed
General support for policy approach	Support welcomed	No change proposed
Policy DS1 should make specific reference to optimising site capacity.	Policy DS1 has been updated to refer to the need for developments to optimise the use of land in Camden and make best of a site.	Change proposed
The priorities of part (iv) of draft Policy DS1 feel contradictory, with the Council requiring a mix of uses but stating that self-contained housing is the Council's priority land use. It is considered that this should be amended to read "Self-contained	We do not consider it contradictory that the plan states that housing is the priority use of the plan and also supports a mix of uses. This is the approach taken in the current adopted local plan. No change is proposed.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
housing is the priority land use in the Plan. However, on appropriate sites, a mix of uses, services, facilities and amenities that meet the needs of the local community and are easily accessible on foot, by bike and via public transport, will also be supported".		
Draft Policy DS1 part (b) and paragraphs 2.27 and 2.28 require major applications to contribute financially to Camden's Citizen Scientist community research programme. This should be removed.	The Citizens Scientist programme has been designed to empower communities to lead change through social action and shape policies that impact their lives. The Citizen Scientist's research will be used to inform a variety of strategies and projects that will help ensure that the right infrastructure is provided to support growth and development in the borough. For example, their research will inform the preparation of masterplans and frameworks, development proposals and the work of the Area Regeneration Team. This is already being demonstrated in Euston, where the Euston Voices researchers have been paid and trained as Citizen Social Scientists to identify what the local priorities are for their community to prosper whilst major regeneration is underway. It is considered that the requirement meets the	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	tests required for Section 106 (S106) obligations.	
General support for policy approach	Support welcomed	No change proposed
The priorities of part (iv) of draft Policy DS1 feel contradictory, with the Council requiring a mix of uses but stating that self-contained housing is the Council's priority land use. It is considered that this should be amended to read "Self-contained housing is the priority land use in the Plan. However, on appropriate sites, a mix of uses, services, facilities and amenities that meet the needs of the local community and are easily accessible on foot, by bike and via public transport, will also be supported".	We do not consider it contradictory that the plan states that housing is the priority use of the plan and also supports a mix of uses. This is the approach taken in the current adopted local plan. No change is proposed.	No change proposed
Draft Policy DS1 part (b) and paragraphs 2.27 and 2.28 require major applications to contribute financially to Camden's Citizen Scientist community research programme. This should be removed.	The Citizens Scientist programme has been designed to empower communities to lead change through social action and shape policies that impact their lives. The Citizen Scientist's research will be used to inform a variety of strategies and projects that will help ensure that the right infrastructure is provided to support growth and development in the borough. For example, their research will inform the preparation of masterplans and frameworks, development proposals and the work of the Area Regeneration Team. This is already	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	being demonstrated in Euston, where the Euston Voices researchers have been paid and trained as Citizen Social Scientists to identify what the local priorities are for their community to prosper whilst major regeneration is underway. It is considered that the requirement meets the tests required for Section 106 (S106) obligations.	
General support for policy approach	Support welcomed	No change proposed
Sport England, with support from Active Travel England and OHID, has produced 'Active Design' https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design a guide to planning new developments that create the right environment to help people get more active. Sport England recommends that Active Design is recommended for use by developers within the Local Plan.	Comments noted. We propose to update the Design Chapter in the Plan to refer to this guidance.	Change proposed
No mention to creating social value at both construction and operational stage of development. This is recommended to be included.	The term social value does not have a standard meaning in terms of planning. However, although the term is not used, Policy DS1 seeks to ensure that all development in the borough contributes to 'Good Growth', which is socially and economically inclusive and environmentally	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	sustainable, in order to maximise community benefit, respond to the climate emergency, create stronger communities and deliver healthy places, both for existing communities and future generations. Other policies seek to secure specific measures that would add social value. No additional wording is considered necessary.	
The policy is fairly standard, except for major development, as they have to contribute to the council's citizen scientist community research programme	Comment noted	No change proposed
Policy DS1Ai should be amended to refer to Camden's… *"…heritage, historic buildings, character and conservation areas."*	We propose to update this policy to also refer to heritage.	Change proposed
General support for approach. However, regard should be had to the location of each site, as self contained housing is not always appropriate, nor is it the most sustainable use of land. We therefore consider that the wording should be revised to read: "Self-contained housing is the priority land use in the Plan. However, on appropriate sites, a mix of uses, services, facilities and amenities that meet the needs of the local community and are easily	Although housing is the priority use, the Plan supports the appropriate provision of other uses. No change to wording is considered necessary.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
accessible on foot, by bike and via public transport, will also be supported".		
Draft Policy DS1 part (b) and paragraphs 2.27 and 2.28 require major applications to contribute financially to Camden's Citizen Scientist community research programme. This should be removed.	The Citizens Scientist programme has been designed to empower communities to lead change through social action and shape policies that impact their lives. The Citizen Scientist's research will be used to inform a variety of strategies and projects that will help ensure that the right infrastructure is provided to support growth and development in the borough. For example, their research will inform the preparation of masterplans and frameworks, development proposals and the work of the Area Regeneration Team. This is already being demonstrated in Euston, where the Euston Voices researchers have been paid and trained as Citizen Social Scientists to identify what the local priorities are for their community to prosper whilst major regeneration is underway. It is considered that the requirement meets the tests required for Section 106 (S106) obligations.	No change proposed
General support for policy approach. Request that policy is applied flexibly.	Support welcomed.	No change proposed
Policy DS1 should make specific reference to optimising site capacity.	Policy DS1 has been updated to refer to the need for developments to	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	optimise the use of land in Camden and make best of a site.	
The priorities of part (iv) of draft Policy DS1 feel contradictory, with the Council requiring a mix of uses but stating that self-contained housing is the Council's priority land use. It is considered that this should be amended to read "Self-contained housing is the priority land use in the Plan. However, on appropriate sites, a mix of uses, services, facilities and amenities that meet the needs of the local community and are easily accessible on foot, by bike and via public transport, will also be supported".	We do not consider it contradictory that the plan states that housing is the priority use of the plan and also supports a mix of uses. This is the approach taken in the current adopted local plan. No change is proposed.	No change proposed
Draft Policy DS1 part (b) and paragraphs 2.27 and 2.28 require major applications to contribute financially to Camden's Citizen Scientist community research programme. This should be removed.	The Citizens Scientist programme has been designed to empower communities to lead change through social action and shape policies that impact their lives. The Citizen Scientist's research will be used to inform a variety of strategies and projects that will help ensure that the right infrastructure is provided to support growth and development in the borough. For example, their research will inform the preparation of masterplans and frameworks, development proposals and the work of the Area Regeneration Team. This is already	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	being demonstrated in Euston, where the Euston Voices researchers have been paid and trained as Citizen Social Scientists to identify what the local priorities are for their community to prosper whilst major regeneration is underway. It is considered that the requirement meets the tests required for Section 106 (S106) obligations.	
Further clarity is needed within Policy DS1 to ensure long-term multi-phase schemes like Euston can come forward in a phased and 'severable' way without being constrained by the broader requirements of this policy.	Comment noted. We have amended the wording in relation to comprehensive development in Policy DS1 and the supporting text.	Change proposed.
Further clarity is needed within Policy DS1 to ensure long-term multi-phase schemes like Euston can come forward in a phased and 'severable' way without being constrained by the broader requirements of this policy.	Comment noted. We have amended the wording in relation to comprehensive development in Policy DS1 and the supporting text.	Change proposed
General support for policy approach	Support welcomed	No change proposed
Policy DS1 should make specific reference to optimising site capacity.	Policy DS1 has been updated to refer to the need for developments to optimise the use of land in Camden and make best of a site.	Change proposed
The priorities of part (iv) of draft Policy DS1 feel contradictory, with the Council requiring a mix of uses but stating that self-	We do not consider it contradictory that the plan states that housing is the priority use of the plan and also supports a mix	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
contained housing is the Council's priority land use. It is considered that this should be amended to read "Self-contained housing is the priority land use in the Plan. However, on appropriate sites, a mix of uses, services, facilities and amenities that meet the needs of the local community and are easily accessible on foot, by bike and via public transport, will also be supported".	of uses. This is the approach taken in the current adopted local plan. No change is proposed.	
The London Plan already defines what constitutes good growth, with detailed polices to support this. We question, therefore, the need for Camden to provide its own version, or additional policies. This will act as a brake on development when housebuilders are already trying to navigate the morass of planning policy in London.	Policy DS1 sets out our priorities for delivering healthy and sustainable development in Camden, to ensure that development makes a positive contribution to the borough. This is in general conformity with and complementary to the approach in the London Plan. No change is considered necessary.	No change proposed
We believe that this should make specific reference to heritage as follows: ' …….are inspired by the character of Camden's neighbourhoods and communities and respect local context and heritage; and are inclusive	We propose to update this policy to also refer to heritage.	Change proposed.
Update para 2.19 to read… Where we live has a profound impact on our health and well-being, it is therefore important that new development ~~helps to~~	We propose to update the Plan to reflect the proposed wording.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
~~improve~~ prioritises improving the built, natural and social environment in Camden		
The lack of step-free access at Kentish Town Underground station is an ongoing problem that will not be solved by the current refurbishment of the escalators. This will become even more critical as sites like Regis Road and Murphy's are developed, bringing with them new housing and jobs. Lift access should be a priority and looked at in tandem with these developments, making sure transport (and all spaces) in Camden are inclusive.	Comments noted. The Plan supports the provision of step free access at Kentish Town Underground Station, with policies for relevant sites requiring development to contribute to step free access.	No change proposed
Need to include a general principle of avoiding impermeable surfaces in the Development strategy to allow rainwater and surface water to drain and reduce flooding.	This is covered in Policy CC12 sustainable drainage. Additional reference in DS1 is not considered necessary.	No change proposed
The policy does not go far enough on providing new open space, and opportunities for play, recreation and sports. The local community needs real investment in a range of sports facilities. Interested in partnering with the Council.	Comments noted. Policies SC2 (Social and Community Infrastructure) and Policy SC3 (Open Space) set out the Council's overarching approach to the provision and protection of indoor and outdoor sports facilities	No change proposed
The planning decisions applied by Camden have not reflected the commitment in the	Comments noted. Policies SC2 (Social and Community Infrastructure) and Policy SC3 (Open	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
existing local plan to protect existing sporting facility space. Commitment to investing in sporting facilities and protecting existing ones should be clearly embedded in all policy decisions.	Space) set out the Council's overarching approach to the provision and protection on indoor and outdoor sports facilities. Policy SC2 recognises that there may be circumstances where a use, either wholly or in part, is no longer required in its current use, and sets out our approach to manage such circumstances.	
Policy DS1 should make specific reference to optimising site capacity and, where appropriate, intensifying the use of land.	Policy DS1 has been updated to refer to the need for developments to optimise the use of land in Camden and make best of a site.	Change proposed
Citizen Scientists" sounds like a good idea, but what qualifications will these people be expected to have?	Comments noted	No change proposed
I think these are the wrong priorities. Each competing goal limits the amount of new housing and raises housing costs.	The Council has undertaken a viability study to demonstrate that the policies in the Plan are deliverable and do not place an undue burden on development.	No change proposed

Chapter 3 – South Area

In total **245** representations were made on the South Chapter. Of these, **28** representations were received via commonplace and **217** representations were received via email.

Representations were received from the following consultees:

- Argent
- Apex Heights Offshore Inc
- Bedford Estates
- Birkbeck (University of London)
- Bloomsbury Conservation Area Advisory Committee (CAAC)
- British Land

- British Museum
- Camden Town Unlimited
- Canal & River Trust
- Covent Garden Community Association
- Cockpit Arts
- Derwent
- Environment Agency
- Greater London Authority (GLA)
- Great Portland Estates
- Historic England
- Home Builders Federation
- Hogarth Properties S.A.R.I. Holborn Links Estate
- LabTech
- Lazari Investments Ltd
- Lendlease & Euston owners
- London Property Alliance
- Metropolitan Companies
- NHS Healthy Urban Development Unit
- Network Rail
- Places for London
- Rocco ventures
- Royal London Assets Management
- Royal Mail Group (RMG)
- Royal Veterinary College
- Shaftesbury Capital
- Simten
- Somers Town Neighbourhood Forum
- Theatre Trust
- The Fitzrovia Partnership
- Thames Water
- Transport for London
- Unite Group
- University College London (UCL)
- University of London
- Woodland Trust
- Members of the public

Policy S1 – South Area

Summary of Comment	Council's Response	Proposed Changes to the Plan
The Somers Town Future Neighbourhoods 2030 programme should be mentioned	We propose to add a reference to the Future Neighbourhoods programme	Change proposed.
We want to underline the importance of the CAZ boundary,	Comment noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
which distinguishes between KQ and residential uses in Somers Town. Outside the CAZ, the priority land use in residential areas such as ours should remain self-contained housing, and estates and open space should be protected. The same goes for Regent's Park Estate		
We need to ensure residential areas beside night time clusters are safe and peaceful for those living and passing through at night. Lighting should be present but should not keep residents awake.	Comment noted. Policy A1 – Protecting Amenity sets out the Plan's approach to these matters.	No change proposed.
We do not believe the delivery of High Speed 2 railway and station at Euston will benefit the local community – these are national projects and should not be funded by a levy on development in the area.	Comment noted.	No change proposed
The Euston Area Plan sits below this Local Plan, and therefore it is not right for the Local Plan to delegate site allocations, building heights, etc in that area to the Euston Area Plan. Euston is within Camden and development there should respond to the borough as a whole.	The Euston Area Plan sets out the overarching strategy for the Euston area. It is appropriate for an area action plan to cover matters such as site allocations. The policies in the Local Plan apply to the whole of the borough, including the Euston area. We propose to include a specific policy in the Local Plan setting out the vision and objectives for the Euston Area.	Change proposed.
Concerned about the development of tall buildings at Euston.	Comment noted. Detail on tall buildings at Euston will be set out in the emerging updated Euston Area Plan, rather than the Local Plan.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Concerned about the future of development of Euston Square. Camden must insist that HS2 Ltd, sticks to the commitment made to fully restore the gardens.	Comment noted.	No change proposed.
Policy S1 should include greater reference to Euston and the Euston Area Plan.	We propose to include a specific policy in the Local Plan setting out the vision and objectives for the Euston Area.	Change proposed.
Please include a map in the Plan showing proposed walking and cycling routes for this area.	It is not considered necessary to include a map of proposed walking and cycle routes in the Local Plan, as this information is contained in other plans and strategies referred to in the Plan.	No change proposed.
Somers Town should be supported more. But no more student housing in the area as transit populations do not aid community.	Comment noted. Policy H9 sets out the Plan's approach to student housing.	No change proposed
The Cromer Street area should be regenerated.	Comment noted.	No change proposed
Welcome that the Plan recognises the importance of South Camden to the Knowledge Quarter and acknowledges that it is home to specialist clusters such as life sciences research.	Support welcomed.	No change proposed
Welcome reference to making the South Camden area "a more habitable … place" (point A), and support of "efforts to widen the range of evening and night-time economy uses in the CAZ retail clusters, particularly where this will benefit local residents".	Support welcomed.	No change proposed
New Homes		
The allocation of sites for housing in the South Area creates an imbalance between the knowledge-based land uses in the south of the borough and the delivery of self-contained homes.	Given the level of housing need in Camden it is appropriate for the Plan to allocate sites for housing throughout the borough.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Notwithstanding our comments on mixed use policy H2, we support part (F) of Policy S1 – South Camden where financial contributions towards housing could be used on Camden's housing estates to enable the delivery of developments through the Council's Community CIP Programme.	Support welcomed	No change proposed
The policy should be amended to support the delivery of purpose built student accommodation in the South Camden Area.	The Plan's approach to student accommodation is set out in policy H9. No additional wording is considered necessary in policy S1.	No change proposed.
Given the existing concentration of innovation and research, the benefits of co-locating major businesses and tech and life sciences clusters, and the high value/limited supply of land, we suggest that other sites within the south of the borough ought to benefit from the same principles applied to the Bloomsbury Campus Area concerning the delivery of self-contained homes within mixed use developments.	The approach taken on to the Bloomsbury Campus Area reflects its specific circumstances and it is not considered appropriate to extend this to other parts of the south of the borough.	No change proposed.
Employment and Economy		
Support Camden's recognition of the role of the CAZ and the Knowledge Quarter have in the knowledge-based fields such as medical and life sciences, data analytics and machine learning.	Support welcomed	No change proposed
The Local Plan should apply greater weight to the development of these knowledge-based and employment land uses in draft Policy S1, over housing.	Self-contained housing is the priority use of the Plan. It is not considered appropriate to apply greater weight to other uses in Policy S1.	No change proposed
Part (H) of this policy relating to new employment floor space is overly restrictive and should be deleted. Much of South Camden falls into the CAZ where a variety	Part H provides for new employment floorspace and is not considered to be overly restrictive.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
of land uses are promoted including leisure and culture and food and beverage.		
Support Part I of the policy which acknowledges that the Central Activities Zone will continue to be the main focus of employment development in Camden. However, it should be recognised in policy that, requiring housing on site in these locations is challenging both in terms of viability and the potential to create a conflict between land uses on already constrained urban sites. The consequence of this may in turn be to prejudice the area's economic productivity and future growth, contrary to London Plan objectives	Comment noted. The cumulative impact of policies on development has been tested through the viability study of the Plan.	No change proposed.
Support Part H and I of Policy S1 which outlines new employment floorspace will be focussed in the South Camden area. We understand there is also a requirement for residential floorspace in the area although consider that employment uses should carry greater weight in the CAZ than residential in line with Policy SD5 (parts A and C) of the London Plan.	Comment noted	No change proposed
Support the criteria regarding supporting the Knowledge Quarter uses and measures to support this.	Support welcomed	No change proposed
Support Part J which seeks to support the Knowledge Quarter to thrive as a hub of innovation and knowledge intensive industries in line with the KQ2050. Requiring housing on site in these locations is challenging both in terms of viability and the potential conflict between land uses and may prejudice the area's economic productivity and future growth,	Comment noted. The cumulative impact of the policies in the Plan on development has been tested through the viability study.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
contrary to London Plan objectives and the KQ2050 Strategy		
General support for part J of the policy.	Support welcomed	No change proposed
Support the policy approach to manage and protect the supply of industrial land in South Camden. Support the policies' emphasis on the Central Activities Zone (within which CA is located) as the main focus for employment development in the Borough.	Support welcomed	No change proposed
Support element of S1 which provides for Bloomsbury Campus Area to expand its role as the heart of Camden higher education.	Support welcomed	No change proposed
The approach in Policy S1 (South Camden) and Policy S3 (Bloomsbury Campus Area) to supporting educational uses in these defined areas is welcomed.	Support welcomed.	No change proposed
The British Museum considers its contribution to the cultural offer in South Camden should be acknowledged and supported as part of draft Policy S1, as it mentions the Knowledge Quarter, life science cluster, Bloomsbury Campus and Hatton Garden specialist employment. .	The Plan recognises the importance of the British Museum in paragraph 3.1 and the Museum is part of the Knowledge Quarter.	No change proposed.
Update part L of the policy to read … Where life science development is proposed in the Camden South area, the Council will not require the inclusion of self-contained homes on-site and will proceed towards a payment-in-lieu contribution.	Policy H2 set out the approach to the provision of self-contained housing in mixed-use schemes. It is not considered appropriate to add the wording proposed which is inconsistent with that approach.	No change proposed.
Infrastructure requirements		
Support points xi), xii) and xiii), on delivery of the Bloomsbury Green Corridor, urban greening, and enhanced access to nature.	Support welcomed	No change proposed
When considering development sites, any loss of ancient or	Policy NE3 (Tree planting and Protection) states that the Council will resist	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
veteran trees should not be permitted. The Ancient Tree Inventory (ATI) for the area may be incomplete and should be reviewed. Policies for Hatton Garden (Policy S2), King's Cross (S8), British Library (S16), Fitzrovia (S10, S11), south of Kings Cross (S12, S13) and Holborn (S18) should seek to maximise potential for new tree planting.	the loss of a tree, group of trees, area of woodland and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. Policy NE3 also states that the Council will require developments to incorporate additional trees and vegetation wherever possible, as part of a detailed landscaping scheme for the site. This policy will be applied to development schemes where applicable. In addition, individual site allocations refer to new tree planting where appropriate.	
Update part S ix of the policy to reflect the need to reinstate four tracks and a third platform on the North London line from the 2030s onwards to meet future passenger and freight demand, and provisions have been made in the disposal for this land to be returned to operational rail use when necessary.	We propose to add reference to this in both C1 and S1.	Change proposed.
Entrance to the Camden Highline should not be allowed on a protected park.	Comment noted. Planning permission has been granted for the access.	No change proposed
Support key priorities especially the Highline, Bloomsbury Green corridor, Sustainable drainage improvements and new open spaces. Do not support an additional bridge over the Regent's Canal	Comment noted	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
between King's Cross and Camley Street		
Welcome that an integrated care hub is proposed for the South Camden and Central Camden. These should be provided on a long leasehold or freehold basis and to ensure its affordability and sustainability should be made available to the NHS at a peppercorn/discounted rent. As the needs of the NHS may change over time ongoing consultation with the ICB is required.	Comment noted.	No change proposed.
Support aspirations to deliver an extensive "Liveable Neighbourhood" scheme in Holborn. However, we urge the Council to carefully consider the possible impact of these plans to the existing commercial occupiers along Southampton Place.	Comment noted and we will pass this comment to colleagues.	No change proposed
The British Museum is generally supportive of the principles of the Holborn Liveable Neighbourhood, however, will need to ensure that it can maintain vehicular access to its site along Great Russell Street to support BM's daily operations as well as emergency services.	Comments noted and we will pass this comment to colleagues	No change proposed

Policy S2 – Hatton Garden Specialist Employment Area

Summary of Comment	Council's Response	Proposed Changes to the Plan
Strongly support maintaining jewellery workshop space in the area	Support welcomed	No change proposed
The area would also benefit from more residential floorspace	Comment noted	No change proposed
Recommend adding a new criteria to support the attractiveness of the area and encouraging the provision of environmental	Policy S2 specifically sets out the Plan's approach to supporting the jewellery industry in	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
enhancements, including urban greening and street trees.	Hatton Garden. Other relevant policies such as Policy S1 - South Area, Policy D1 - Achieving Design Excellence and Policy NE3 - Tree Planting and Protection would be applied to any development proposals in the area. No additional wording is considered necessary.	

Policy S3 – Bloomsbury Campus Area

Summary of Comment	Council's Response	Proposed Changes to the Plan
A boundary map should be provided in the draft local plan to determine the extent of the Bloomsbury Campus Area that is defined in draft Policy S3.	We propose to include a map in the Plan and update the Policies Map to show the extent of the Bloomsbury Campus Area.	Change proposed
We are very concerned about the colonisation of areas of central Bloomsbury by the University. The 'campus' feel must not spill out of the University buildings and grounds to take over streets and other public open spaces.	Comment noted	No change proposed
Support the general policy approach, but some aspects are unclear and don't reflect the University's current and future needs/ aspirations. There is no requirement for additional academic space. Post Covid there is more home working and the requirement for academic and administrative space has reduced. Lots of administrative space is not fit for purpose, such as converted Georgian townhouses. What is needed is an improvement to the quality of	Comment noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
existing space, or the creation of purpose-built space and the conversion of existing for alternative uses.		
Overall Birkbeck is supportive of the general aims of Draft Policy S3 but considers that further up to date evidence is required and reflected within the aims of the policy. Further there should be more consideration of allowing for flexibility across the provision or changing use of academic floorspace and a general level of support for any viable strategy which helps Birkbeck to meet its sustainability objectives	Comment noted. We will continue to work with the Universities.	No change proposed.
Welcome the approach in Policy S3 of enhancing and supporting the provision of open space, and streets (including easier manoeuvrability for walking or cycling)	Support welcomed	No change proposed
UCL are currently preparing an estate strategy which will set out their aspirations for the next 25 years. As part of this review, it may be considered that certain buildings, with constrained floorplates, may be less efficient for education use but more appropriate for alternative land uses. On this basis, we therefore request that a level of flexibility is afforded to such situations in the borough to promote the best use of existing buildings, and consideration to such wording being afforded to draft Policy S3, as well as draft Policy SC2 part D (Social and Community Infrastructure)	Any application for the conversion of educational facilities would be considered against all relevant policies in the Plan, including the Policy S3 and Policy SC2. It is considered that the draft Plan contains sufficient flexibility and no change is therefore considered necessary.	No change proposed.
Offering a level of temporary flexibility for conversion of buildings to an educational use would help support higher education institutions to respond	Any applications for temporary use would be assessed against all relevant Local Plan policies. It is not	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
to unexpected alterations in demand, or support ongoing works relating to a wider estate strategy, and request appropriate wording is considered on this basis in draft Policy SC2.	considered appropriate to add wording in Policy SC2 to provide flexibility specific to higher education institutions.	
Part B of Draft Policy S3 contains contradicting requirements whereby it states that academic floorspace should be 'consolidated and increased' in a way that supports the Universities' achievements…' Birkbeck would wish to note that their experience of the post-covid world is one in which their requirements as a university has changed. In particular, a large proportion of work which at one time was undertaken by University staff on campus is now undertaken from home, resulting in less need for physical academic and administrative office space, Some of these buildings are considered more suitable for residential use rather than academic educational spaces. We would kindly request that consideration of such alternative uses is included into Policy S3 where it is demonstrated that teaching and learning floorspace is not the most appropriate.	Supporting the universities and their contribution to Camden's economy as a key component of the Plan, Knowledge Quarter and growth of science and creative sectors. Any application for the conversion of educational facilities would be considered against all relevant policies in the Plan, including Policy S3 and Policy SC2. No change is therefore considered necessary.	No change proposed.
Part B(i) should be amended to seek improved quality space and new high quality space, including supporting office space	The policy already refers to student support services and other ancillary space.	No change proposed.
We support Part B(ii), which aligns with the University's net zero aspirations.	Support welcomed	No change proposed
Proposals for additional student housing in the Area are supported, but should be backed by a specific target.	Policy H9 (Purpose Built Student Accommodation) sets out an overall student housing target for Camden. It is not considered appropriate or	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	practical to set a specific target for the Campus Area.	
Criteria C - There should also be mention of protecting the need for housing for local residents which is equally (if not more) important than safeguarding the need for additional academic space.	Policy H3 sets out the Plan's approach to protect existing homes. As set out in Policy H1, self-contained housing is the priority land use in the Plan.	No change proposed
Should amend Part C to also refer to any ancillary office floorspace being exempt from the need to include self contained housing.	The suggested amendment is not considered appropriate.	No change proposed.
This area has several notable and veteran trees, including the Gower Plane. We suggest amending point iii) to read: iii. Enhance the area's rich historic and architectural character and respect its many heritage assets including important trees. An alternative amendment could be to add a new point viii): viii. Enhance the area's natural environment and character, and respect its natural assets, including important trees	The Plan's approach to protecting trees is set out in Policy NE3 (Tree Protection and Planting). It is not considered necessary to add specific criteria in Policy S3.	No change proposed.
Support the Policy, especially enhancing open space, streets and footpaths. This should go further and provide more commitment to improved greening of the area.	Support welcomed. The Plan's approach to greening is set out in Policy NE1 (Natural Environment). It is not considered necessary to add further reference in Policy S3.	No change proposed
Paragraph 3.34 should be amended to support accessible student housing designed for connectivity to green spaces and using a place-based approach.	Policy S3 supports proposals for student housing in specific circumstances provided academic needs can also be met. Policy H9 sets out the Plan's approach to student housing and expects provision to be safe, functional, adaptable and	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	accessible, including outdoor amenity space. No change to paragraph 3.34 is considered necessary.	
We support proposals to improve public space at Torrington and Woburn Squares, but are concerned that public access to private spaces such as Malet Street Gardens could harm their management.	Comment noted.	No change proposed.
Birkbeck is supportive of the ambition of the draft policy which would seek to reflect Birkbeck's aims and objectives to meet its sustainability objectives and decarbonise its existing buildings in order to deliver reductions in carbon dioxide emissions. Birkbeck would note, however, that they would look for support from the Council in helping Birkbeck to meet these sustainability objectives through any chosen commercially viable strategy.	Support welcomed	No change proposed
A specific cross reference between Policy S3 and Policy IE2 should be made in the interest of clarity and consistency. This would note that where the loss of office use is considered acceptable under Policy IE2, the provision of educational uses and student accommodation within the Bloomsbury Campus Area, will be seen as acceptable alternative uses alongside permanent self-contained housing.	A cross reference to Policy IE2 is not considered necessary. All relevant plan policies will apply to any development schemes in the Campus Area.	No change proposed.
In terms of Policy S3 (C) which states that housing will not be sought as a mixed use element of higher education development, a cross reference back to the mixed use Policy H2 would assist clarity	A cross reference to Policy H2 is not considered necessary. All relevant plan policies will apply to any	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
and reconfirm the LPA's position expressed at Policy S3.	development schemes in the Campus Area.	
In terms of Policy S3C, The Estate sees no reason why this dispensation from the provision of self-contained housing as part of mixed use development, cannot be held to apply to privately funded schemes as equally as it is to publicly funded schemes. The specific reference to publicly funded should therefore be deleted.	The wording of Policy S3 Part C is considered appropriate and it consistent with the approach take in in Policy H2.	No change proposed.
It would be helpful if the policy could be amended to clarify that other types of residential development providing self-contained (C3) accommodation will be supported.	The policy does not preclude proposals for self-contained residential development in this area. No additional wording is considered necessary.	No change proposed
The supply of student accommodation is important, but it is necessary to ensure that the conventional housing needs of the resident population are catered for and not forced-out by the growing demand for student accommodation as a consequence of the expansion of the student-body	Comment noted.	No change proposed

Policy S4 – 120 -136 Camley Street

Summary of Comment	Council's Response	Proposed Changes to the Plan
Given this is a designated industrial area, the allocation should include details about existing amount of industrial floorspace on site and amount expected post development	Site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.	
Industrial floorspace including B8 should be retained on site through co location.	The allocation is for a mixed use development which is expected to intensify the employment floorspace on the site, with no net loss.	No change proposed.
Should commit in the Employment policies to producing a monitoring framework for industrial capacity in the borough which will help to inform decision making	The Council reports on the monitoring industrial floorspace in its Authority Monitoring reports available on the Council's website.	No change proposed.
Welcome the references to improving the public realm, green spaces and cycle / pedestrian routes, which will all have a positive influence on health and wellbeing	Support welcomed.	No change proposed
Support improving the public realm connectivity along Camley Street	Support welcomed.	No change proposed
Public realm Improvements should explicitly state how they will contribute towards improved access to bus services along Agar Grove.	We propose to add reference to improved access to bus services on Agar Grove.	Change proposed.
Support the biodiversity and urban greening requirements	Support welcomed.	No change proposed.
Thames Water envisage given the scale of development upgrades to the water supply and wastewater networks are likely to be required	Comment noted. This is identified in the allocation.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy S5 104 - 114 Camley Street

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support a collaborative approach and the criteria requiring an integrated plan for the entire site, but object to reference in the background section to a joint outline planning application as this is considered unrealistic and should be removed.	Support welcomed. We propose to remove reference to a joint outline permission but remain committed to ensuring that a coordinated approach is taken.	Change proposed.
Given this is a designated industrial area, the allocation should include details about existing amount of industrial floor space on site and amount expected post development	Site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.	No change proposed.
Industrial floorspace including B8 should be retained on site through co location.	The allocation is for a mixed use development which is expected to	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	intensify the employment floorspace on the site, with no net loss.	
Should commit in the Employment policies to producing a monitoring framework for industrial capacity in the borough which will help to inform decision making	The Council reports on the monitoring industrial floorspace in its Authority Monitoring reports available on the Council's website.	No change proposed.
Proposed uses should include reference to student housing, given the proximity to the Bloomsbury Campus area and student housing target and would ensure maximum flexibility.	Appropriate sites have been allocated for student use within the Local Plan. However, this site is not considered suitable. Any proposal for student housing would need to be assessed against the Camley Street Neighbourhood Plan policy CS HS03.	No change proposed.
There is concern for the lack of flexibility regarding draft policy H9 where sites are allocated for self-contained housing. With reference to draft site allocation S5, it is important that specific site allocations incorporate as much flexibility as possible. Where a mix of uses are being encouraged, student housing can provide an important form of housing which is in high demand, and has shown resilience in an uncertain market	Appropriate sites have been allocated for student use within the Local Plan. However, this site is not considered suitable. Any proposal for student housing would need to be assessed against the Camley Street Neighbourhood Plan policy CS HS03.	No change proposed.
Where is the evidence to support the 750 indicative capacity? Given emerging schemes a figure of 500 is considered more realistic.	The indicative capacity is based on a design assessment of the site, consistent with Local Plan policies.	No change proposed.
Support the proposed improvements to the public realm along key routes.	Support welcomed	No change proposed.
Development should improve or contribute to improved access to bus network.	This would be assessed under draft Local Plan Policy T3. A specific reference in Policy S5 is	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	not considered necessary.	
Should include contributions towards a new canal crossing to improve connectivity between King's Cross, Camley Street and St Pancras Way similar to the one in S7.	There is already a reference to this in the allocation.	No change proposed.
Contributions should be sought for improvements to the canal tow path as development will bring increased activity and use for active, safe and sustainable travel	This would be assessed under draft Local Plan Policy T2. A specific reference in Policy S5 is not considered necessary.	No change proposed.
Support requirements for tree retention and increased urban greening.	Support welcomed	No change proposed.
Welcome the references to improving the public realm, green spaces and cycle / pedestrian routes, which will all have a positive influence on health and wellbeing	Support welcomed.	No change proposed
Thames Water envisage given the scale of development upgrades to the water supply and wastewater networks are likely to be required	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy S6 Parcelforce and ATS site

Summary of Comment	Council's Response	Proposed Changes to the Plan
Background context		
Royal Mail support the inclusion of the site as an allocation, but think that the former ATS site should be a separate allocation as in	A single allocation will ensure that development takes place in a co-ordinated way regardless of site ownership.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
separate ownership and has an extant permission.		
No need or relevance to referring to Parcelforce vacating the site in 2025.	Comment noted and we propose to amend the policy to refer to this.	Change proposed.
Given the previous permission included a health centre, the NHS should be consulted on any future planning application regarding the most up to date need.	Comment noted.	No change proposed.
Concerned about the potential negative impacts on the amenity of the occupiers of the adjacent Royal Veterinary College student block and the Bioscience Innovation centre during construction and operation.	Any potential impacts on the amenity of neighbours would be assessed at the planning application stage and potential impacts during the constructions stage would be controlled through a construction management plan in accordance with Local Plan policy A1 (Protecting Amenity).	No change proposed.
Allocated Uses		
The Royal Veterinary College (RVC) adjoins the site and support the proposed uses, including research and knowledge based uses.	Support welcomed.	No change proposed
Allocated uses should refer to housing only, not self-contained homes	Self-contained housing is the priority use of the Local Plan. Given the size of the site the policy also seeks appropriate provision for consideration of affordable housing for older people or other people with care or support requirements as part of the additional affordable housing provision.	No change proposed.
Given that the site is within walking distance of university facilities, it is considered suitable for purpose built student	Appropriate sites have been allocated for student use within the Local Plan. However,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
accommodation. Student housing contributes to housing supply and therefore sites should be identified.	this site is not considered suitable.	
Development and Design Principles		
The reference requiring the involvement of relevant landowners should be amended to emphasise the need to demonstrate that they have been prepared as part of coordinated and integrated plan that maximises benefits from both sites.	We propose to amend the policy to clarify the expectation for a coordinated approach across the two sites.	Change proposed.
Housing in commercial led mixed use scheme jeopardises the feasibility of commercial development. The requirement to optimise housing should be removed.	Meeting our housing target is a key objective of the Local Plan and this criterion contributes towards this. There are many examples in Camden of successful mixed use schemes with both commercial and housing floorspace.	No change proposed.
As the site is identified as suitable for a tall building. It is also considered suitable for purpose built student accommodation	Identification of a site as being potentially suitable for a tall building does not in itself make it suitable for purpose built student accommodation. Appropriate sites have been allocated for student use within the Local Plan. However, this site is not considered suitable.	No change proposed.
Reference to intensifying employment uses should include specific reference to floor area	We propose to clarify that the intensification of employment uses on the site should ensuring no net loss of floorspace.	Change proposed.
The area is not considered to have a 'fine' grain . Reference should therefore be removed to 'finer'	The use of the wording 'fine grain' in the policy is considered appropriate.	No change proposed.
Remove reference to considering the inclusion of affordable housing	Sites larger than 0.5 hectares are considered	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
for older people or other people with care or support needs as part or all of the affordable housing contribution.	to offer the potential to deliver these important uses.	
Support requirements for street tree planting and increased urban greening.	Support welcomed	No change proposed.
Infrastructure requirements		
Welcome the proposed infrastructure upgrades including cycle way on Pratt Street and contributions to a potential new canal crossing.	Support welcomed	No change proposed.
The extant health care facility permission contained a clause ensuring the NHS Trust had first refusal to occupy the development. This should be retained in any subsequent planning application and the NHS consulted.	Comment noted. This would be considered at any subsequent planning application stage if health facilities are proposed.	No change proposed.
Remove reference to a potential canal crossing as it is not considered a reasonable as part of NPPF tests for S106.	Given the increase in homes and people in the vicinity of the Canal, an additional crossing to improve access and pedestrian routes to support active travel is considered to be a reasonable and a relevant request.	No change proposed.
Given the scale of development in proximity to the Royal College Street bridge access to the canal towpath a further contribution to improved access to the Canal should be included	This would be assessed under draft Local Plan Policy T2. A specific reference in Policy S5 is not considered necessary.	No change proposed.
Thames Water envisage given the scale of development upgrades to the water supply network are likely to be required. But raise no concerns regarding waste water networks.	Comments noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality and Policy NE2 -	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
• Borehole on site: idris ltd pratt street (chalk group) • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush • Protected species: Threatened lichen record	Biodiversity, and would be taken into account at the planning application stage.	

Policy S7 – St Pancras Hospital Site

Summary of Comment	Council's Response	Proposed Changes to the Plan
Background / Context		
Reference in the background section to prioritising homes for the part of the site not occupied for health purposes should be identified as being subject to site constraints and financial viability	It is not considered necessary to add reference to this in the context section of the allocation.	No change proposed.
Reference to the water tower being a distinct landmark should be removed from the background section	The reference reflects the content of the Conservation Area Appraisal Statement.	No change proposed.
Support the allocation including the indicative capacity, use and design details.	Support welcomed	No change proposed.
A Health Impact Assessment should be a requirement, to assess the loss of vital services from the site.	Any application would be assessed against Policy SC1(Improving Health and Wellbeing), which sets out the requirements for Health Impact Assessments to be undertaken.	No change proposed.
Support the inclusion of the site but it needs to reflect outcomes from pre application discussions, constraints of the site and a design led approach.	Support welcomed. We propose to update the policy to reflect updated information where relevant.	Change proposed
Allocated Uses		

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support the inclusion of education and research and knowledge uses, together with new homes on this site.	Support welcomed.	No change proposed.
Support the allocation as a mixed use site including knowledge based activities, given the granting of approval to re locate Moorfields Hospital.	Support welcomed	No change proposed.
The mixed use of the site is supported.	Support welcomed.	No change proposed.
Given that the site is within walking distance of university facilities, it is considered suitable for purpose built student accommodation. Student housing contributes to housing supply and therefore sites should be identified.	Appropriate sites have been allocated for student use within the Local Plan. However, this site is not considered suitable.	Change proposed.
Residential use should be the priority over office accommodation, given surplus office space.	The policy identifies the continued use of the site for health purposes is the priority use and the parts not occupied by health facilities should be self-contained housing	No change proposed
Any development must be residential led.	The Policy identifies residential as the priority use for parts of the site not required for health purposes.	No change proposed
All the housing provision should be social housing not 'affordable housing' or for sale.	Housing provision will be assessed in accordance with the Local Plan Housing Policies.	No change proposed.
The allocated uses should include ancillary retail, food and beverage and leisure uses to allow for active frontages at ground floor.	The site is not within a town or neighbourhood centre and it is therefore it not considered appropriate to make a specific reference to retail as a proposed use. Any proposals for retail etc on the site will be considered against the allocation and all other relevant Local Plan policies.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Indicative Capacity		
Indictive capacity section should be amended to Indicative residential capacity as no other uses specified.	We proposed to amend the reference to 'Indicative Housing Capacity'	Change proposed.
The residential capacity for the site should be reduced to 110 in accordance with pre application.	The indicative capacity is based on a design assessment of the site, consistent with Local Plan policies.	No change proposed.
The indicative capacity should acknowledge that a lower number may be justified for reasons such as heritage policies, retention of heritage buildings.	Paragraph 3.37 explains that the indicative housing capacities are not fixed figures, a higher or lower number may be considered appropriate if it can be justified. They are indicative only.	No change proposed.
Development and Design principles		
The approach for the identified height range does not follow the methodology set out in the Building Height study table 2.1 and should be reviewed.	The approach and findings are considered to be consistent with the Building Height Study methodology. Table 2.1 sets out a broad conceptual categorisation of tall buildings, whilst the content of the Recommendations table sets out the results of detailed assessments for individual sites taking into account site specific factors. The heights are taken from the Recommendations table.	No change proposed.
It is considered that some text is missing from the Building Heights reference that refers to "additional height above these potentially appropriate height ranges may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views"	The suggested 'missing' text has been included for relevant sites in strategic viewing corridors or panoramic views identified in the London View Management Framework. This site is not within those protected views so it is not	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	appropriate to include the proposed wording.	
As the site is identified as suitable for a tall building. It is also considered suitable for purpose built student accommodation	Identification of a site as being potentially suitable for a tall building does not in itself make it suitable for purpose built student accommodation. Appropriate sites have been allocated for student use within the Local Plan. However, this site is not considered suitable.	No change proposed.
Height of the buildings should not exceed that of the Oriel and Tribecca, so they are not overbearing to surrounding residential blocks and respectful of St Pancras Old church and Gardens. 45m should be the maximum height.	The policy reflects the Camden Building Height Study which identified a potentially appropriate height range for the site of 12-45m. The acceptability of any tall building proposals will be assessed against the allocation, Policy D2 (Tall Buildings) and other relevant development plan policies.	No change proposed.
New buildings should be limited to 6- 10 storeys.	The Camden Building Heights Study has identified this site as a location where a tall building may be an appropriate form of development and identified a potentially appropriate range. This is reflected in the allocation.	No change proposed.
New development must not obstruct important views and should be capped at the same height as adjacent structures.	The Camden Building Heights Study has identified this site as a location where a tall building may be an appropriate form of development and identified a potentially appropriate range. The	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	acceptability of any tall building proposals will be assessed against the allocation, Policy D1 (Achieving Design Excellence), Policy D2 (Tall Buildings) and all other relevant development plan policies.	
Want to understand the potential distribution of height across the site to understand potential negative impacts on the Royal Veterinary College buildings both during construction and operation. Early engagement in the design proposals is therefore requested.	Early engagement with adjoining landowners is always encouraged. Impacts on amenity, including at the construction phase, will be assessed as part of the planning application through the Local Plan policy A1 (Protecting Amenity).	No change proposed.
The maximum building heights in the policy should be enforced.	Comment noted. Tall building proposals will be assessed against the site allocation, Policy D2 (Tall Buildings) and other relevant development plan policies.	No change proposed.
Should include subject to site constraints and financial viability in design criteria relating to optimising provision of homes.	These would be considered when any scheme is assessed. It is not considered necessary to add the suggested wording.	No change proposed
An additional criteria should be included to recognise the site is adjacent to St Pancras Gardens which are classed as a priority habitat	We propose to update the Policy to reflect this.	Change proposed.
Development must respect the Regent's Canal and protect and provide play areas	We propose to amend the policy to include reference to protecting the biodiversity of the Canal. Provision of play areas would be consistent with Local	Part change required.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	Plan Policy SC4 (Open spaces).	
Enhancing the Canal and should be a priority and creating green spaces including a public square in the north corner of the site.	The policy supports exploring opportunities to integrate open space, landscaping and public realm spaces in the north east corner of the site as a means to helping to facilitate Canalside access.	No change proposed.
Commercial uses could lead to unacceptable light spillage into adjoining residential areas and the canal.	We proposed to amend the policy to refer to managing impacts of light pollution on the Canal. Any impact on residential properties would be assessed against Local Plan Policy A1 (Protecting Amenity).	Part change required.
Policy should recognise the intention in the current plan and Neighbourhood Plan for open space in the northeast corner.	The policy supports exploring opportunities to integrate open space, landscaping and public realm spaces in the northeast corner of the site.	No change proposed.
Infrastructure requirements		
Policy should include the original proposal for a canal bridge from Camley street.	The policy seeks contributions to a new Canal crossing.	No change proposed.
Concerned about the potential impact on wildlife along the Canal of an additional canal crossing, particularly given that it is a site of Metropolitan importance for nature conservation.	The potential impact of an additional Canal crossing would be considered as part of the consideration of any planning application, and mitigation measures required as appropriate.	No change proposed.
Support the requirement for an additional canal bridge	Support welcomed	No change proposed.
An additional criteria should be included to secure financial contributions to improved access to and along Regent's Canal.	This would be assessed under the requirements of Policy T2 of the draft Local Plan. A specific reference is not considered necessary.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Thames Water envisage the scale of development is likely to require upgrades to the water supply but do not envisage infrastructure concerns regarding wastewater networks	Comment noted	No change proposed.
The Environment Agency identified relevant Environmental constraints • Borehole on site: St Pancras hospital (chalk group) • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush Protected species: Threatened lichen record	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality and policy NE2 - Biodiversity, and would be taken into account at the planning application stage.	No change proposed

Policy S8 – Shorebase Access

Summary of Comment	Council's Response	Proposed Changes to the Plan
Criteria regarding the historic context should include also how proposals have responded to the existing heritage significance and character and that care has been given to respecting the views that take is St Pancras Old Church and St Pancras Gardens.	We propose to add reference to the setting and views of the heritage assets.	Change proposed.
Add in reference to including new tree planting in the criteria relating to the green buffer due to the areas deficiency in tree cover	We propose to add reference to tree planting.	Change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality and policy NE2 - Biodiversity, and would be taken into account at	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
• Protected species: Triangular Club-rush Protected species: Threatened lichen record	the planning application stage.	
Consideration should be included regarding the delivery of off-site Biodiversity Net Gains.	This would be considered at the planning application stage.	No change proposed.

Policy S9 Eagle Wharf and Bangor Wharf

Summary of Comment	Council's Response	Proposed Changes to the Plan
Increased capacity from previous version would impact health provision impacts. Appropriate mitigation measures would be required and should be discussed with the NHS.	This matter would be assessed under Policy SC1(Improving Health and Wellbeing), which requires Health Impact Assessments.	No change proposed.
The policy should be clear that the two parts of the site could come forward as separate applications, in order to not frustrate delivery. Also reflecting the different landownership and matters of viability.	We propose to amend the policy to make clear that the development should take a coordinated approach and that landowners are expected to work together.	Change proposed.
Background section should include reference to the site being within the Knowledge Quarter consistent with other allocations.	Reference to sites being in the Knowledge Quarter have been removed in all policies, as this isn't a policy designation.	No change proposed.
Unsure how the indicative housing capacity has been arrived at. It should be design led in accordance with London Plan policy D3. This will ensure that it is not seeking too high a figure given the other considerations set out in the allocation.	The indicative capacity is based on a design assessment of the site, consistent with Local Plan policies.	No change proposed
Should replace development 'must' with 'shall' to allow flexibility.	It is not considered necessary or appropriate to remove the word 'must' from the policy wording. Appropriate flexibility in the policy is introduced through the	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
	wording of specific criteria.	
Support the recognition of biodiversity and habitat corridors.	Support welcomed	No change proposed.
This location may be appropriate for moorings. A new criteria requesting consideration of this should be included.	We propose to add a reference to moorings.	Change proposed.
An additional criteria should be included to secure financial contributions to improved access to and along Regents Canal.	This would be assessed under the requirements of Policy T2 of the draft Local Plan. A specific reference is not considered necessary.	No change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush Protected species: Threatened lichen record Protected species: European Eel migratory route (GUC)	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality and policy NE2 - Biodiversity, and would be taken into account at the planning application stage.	No change proposed

Policy S10 Network Building and Whitfield Street

Summary of Comment	Council's Response	Proposed Changes to the Plan
Confirm that the planning permissions 2020/5624/P and 2020/5631/P have been implemented and construction is underway with completion expected in H2 2025. Allocation should be updated to reflect this.	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	Change proposed – removed from the Plan.
Request an addition to the ' Other considerations' section that the	Given the imminent completion of the	n/a

Summary of Comment	Council's Response	Proposed Changes to the Plan
site is within Crossrail 2 Safeguarding Directions. - Any development on this site should not result in piling which affects the planned running tunnels.	development we propose to remove this policy from the Local Plan.	
Support the policy criteria regarding greening new public realm. Request the addition of reference to new tree planting.	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	n/a
This site is within walking distance of university facilities and so should also encourage purpose built student accommodation in the indicative uses.	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	n/a
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	n/a
The Environment Agency identified relevant Environmental constraints – • Bedrock Aquifer (unproductive) • Superficial Aquifer (Secondary A)	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	n/a

Policy S11 – Former Tottenham News Day Hospital

Summary of Comment	Council's Response	Proposed Changes to the Plan
Confirm that the planning permissions 2020/5633/P have been implemented and construction is underway with completion expected in H2 2025. Allocation should be updated to reflect this.	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	Change proposed – removed from Local Plan.
Request a strengthening of the public realm improvements infrastructure requirement to refer to street trees and urban greening.	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	

Summary of Comment	Council's Response	Proposed Changes to the Plan
If the extant permission is not implemented. Any new application or modification should include similar wording to the agreed position of providing support for other mental health services.	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	n/a
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	n/a
The Environment Agency identified relevant Environmental constraints – • Bedrock Aquifer (unproductive) • Superficial Aquifer (Secondary A)	Given the imminent completion of the development we propose to remove this policy from the Local Plan.	n/a

Policy S12 – Former Royal National Throat, Nose and Ear Hospital

Summary of Comment	Council's Response	Proposed Changes to the Plan
Welcome the provision for on site pocket park and suggest this is amended to include new tree planting.	Support welcomed. We propose to add reference to new tree planting.	Change proposed
The impact of noise vibrations on the adjoining UCL Ear Institute was a critical matter in determining the planning permission for this site. A similar agreement to that approved should be included in any alternative planning permission.	Comment noted. We propose to add reference to the need to protect the functioning of the Ear Institute from construction impacts.	Change proposed
Thames Water envisage given the scale of development upgrades to the water supply water networks are likely to be required.	Comment noted. This is referred to in the policy.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality, and would be taken into account at the	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	planning application stage.	

Policy S13- Belgrove House

Summary of Comment	Council's Response	Proposed Changes to the Plan
Site is within Crossrail 2 Safeguarding Directions and is a site of surface interest. Any future planning applications should be referred to TfL.	Comment noted. We propose to add reference to the safeguarding directions.	Change proposed.
Support the proposals for an integrated, step-free entrance to Kings Cross Station to improve access. Although implicit, it should be set out that this will be delivered as part of the development as works in kind and secured through an appropriate planning obligation.	Support welcomed. No change to the wording is considered necessary.	No change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy S14- Former Thameslink Station, Pentonville Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
TfL should be closely consulted on any proposals relating to this site as they continue to operate services through the former network rail station.	Comment noted. TfL would be consulted on any planning application.	No change proposed
Given the constraints and the complexity of the site, it is	It is considered that the policy gives appropriate	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
essential that the policy provides an appropriate degree of flexibility on land use and design whilst providing a positive and clear direction for the site to be comprehensively developed	direction for the development of the site.	
Allocated Uses		
Places for London strongly support the identification of the site for a well designed, high density, mixed use development.	Support welcomed.	No change proposed.
The allocated uses should be flexible to include a range of office, R&D, workspace uses, but also hotel and student accommodation and housing. The exact land use mix would depend on which land use performs best in terms of viability and deliverability	The allocated uses set out the Council's preferred position for this site. This includes research and knowledge-based uses, maker spaces and offices, as well as housing. Self-contained housing is the priority use of the Plan.	No change proposed.
Building traditional housing on this site is likely to be difficult due to the site constraints of live tracks, adjacent late night uses. So the acknowledgement of potential off site housing is welcomed.	Support welcomed.	No change proposed.
Allocated uses should be revised to all Class E commercial floorspace uses, hotel, student accommodation or nightclub use as well as permanent self-contained homes.	The allocated uses set out the Council's preferred position for this site. This includes research and knowledge-based uses, maker spaces and offices, as well as housing.	No change proposed.
Development and Design principles		
The reference to needing to respect the listed building ad conservation area is not required as all developments would need to do this.	It is considered appropriate to include reference to respecting the adjacent listed building and the Scala building, as a positive contributor to the conservation area.	No change proposed.
The criteria relating including housing should reference the	As this matter is covered by Policy H2, it is not	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
statement in Policy H2 that the target of 50% net additional non residential floorspace is not applied to publicly funded or services including transport infrastructure.	considered necessary to add reference in Policy S14.	
The disused station entrance building detracts from the conservation area as recognised in the Conservation Area statement. Redevelopment therefore offers the opportunity to address this.	Comment noted.	No change proposed.
365 Grays Inn Road is also vacant and another prominent corner building that detracts from the Conservation Area. Demolition is likely to be required for this building to enable decking of the rail and tube lines to the rear. The requirements of CC2 should be applied with a degree of flexibility	The property referred to lies outside of the boundary of the allocated site, which was drawn incorrectly in the Reg 18 version of the Plan. Any application for demolition of the property would be assessed against Policy CC2 (Retention of existing buildings).	Site boundary error has been corrected.
The policy should make reference to the site being suitable for a tall building, which in this part of the area is over 40 metres. This is supported. The policy should make reference to this.	The site was not identified in the Camden Building Height Study as a location where tall buildings may be an appropriate form of development, Any application for a tall building would be assessed against Policy S14, Policy D2 (Tall Buildings) and all other relevant policies.	No change proposed.
This is strategically prominent site and important entry way into London. Reference should be included to allow for a tall, landmark development.	Any application for a tall building would be assessed against Policy S14, Policy D2 (Tall Buildings) and all other relevant policies	No change proposed.
Infrastructure requirements		
Support the requirement to retain an entrance to King's Cross St Pancras Station.	Support noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
The re-opening of the station entrance / exit here would need to be subject to extensive operational discussions at TfL to establish whether there is operationally a need for an entrance/ exit here.	We propose to add a reference to the need to consult relevant transport providers about the entrance / exit.	Change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy S15 - Land at Packenham Street and Wren Street

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support additional housing on this site, as long as not luxury housing that is often left empty or only affordable to foreign investors. Local residents do not need additional in house gym/ cinemas or spa areas.	Comment noted.	No change proposed.
Has the site been considered for student accommodation?	Self-contained housing is the priority use of the Local Plan, particularly on Council- owned sites. Other sites are allocated for student accommodation.	No change proposed.
Additional offices or ground floor shops would be beneficial to the area.	The allocated uses include employment uses.	No change proposed.
Affordable housing must be included to ensure life is bought back to the area.	Any development proposal would be assessed against Policy H4 - Maximising the	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	supply of affordable housing.	
As an adjacent landowner of student accommodation, has consideration been given to the safety measure for high risk buildings from adjacent users.	The impact of specific proposals on adjacent properties would be considered at the planning application stage.	No change proposed.
Development should ensure there are sufficient bins for residents. There is an existing shortage on Cubbitt Street that results in a lot of rubbish on the streets.	Policy D1 (Design) requires the provision of appropriate facilities for separation and collection of all waste and recycling.	No change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints – • Bedrock Aquifer (unproductive) • Bedrock Aquifer (Secondary A) • Superficial Aquifer (Secondary A)	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy S16 - Land to rear of British Library

Summary of Comment	Council's Response	Proposed Changes to the Plan
Additional text should be included to ensure no adverse impact on the Grade I listed building.	We propose to add reference to avoiding any adverse impacts on the Grade I listed British Library.	Change proposed.
Allocation refers to the Crossrail 2 safeguarding Direction but should also identify that it is in an area of surface interest.	We propose to add reference to the area of surface interest.	Change proposed.
Additional criteria relating to Crossrail 2 should be included	We propose to add further reference to Crossrail 2.	Change proposed.
Support the requirement to ensure Crossrail 2 infrastructure be	Support welcomed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
incorporated positively into the public realm		
Any future proposal would need to have a contribution towards a cycle hire station as per the previous planning permission.	Any future contribution would be assessed at the planning application stage against relevant Local Plan policies at that time.	No change proposed.
Include new tree planting in the green infrastructure provision	We propose to add reference to new tree planting.	Change proposed.
Would like the story garden retained in any redevelopment for the local community	The Story Garden is a temporary use of the site envisaged as being in place while development proposals are being prepared. The operators of the Story Garden have been given a permanent site at the Triangle site off York Way and also operate the Floating Garden on the Kings Cross Site, so remain in the area.	No change proposed.
The Environment Agency identified relevant Environmental constraints – • Bedrock Aquifer (unproductive) • Protected species: Triangular Club-rush • Protected species: Threatened lichen record	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality and policy NE2 - Biodiversity, and would be taken into account at the planning application stage.	No change proposed.

Policy S17- Former Central St Martins College

Summary of Comment	Council's Response	Proposed Changes to the Plan
This site is within walking distance of university facilities and so should also encourage purpose built student accommodation in the indicative uses.	We propose to amend the policy to include student accommodation as a potential use.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Do not consider the phrase 'be sensitive' in relation to height to have any real meaning.	The wording is considered to be appropriate. Any proposal would be assessed against all relevant Local Plan policies including those on tall buildings (D2) Design (D1) and Heritage (D5).	No change proposed.
No objection to the principle of redevelopment but the recording condition attached to the planning permission should be maintained given the social significance of the theatre.	Comment noted. This would be considered at the planning application stage.	No change proposed
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy S18 - Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street

Summary of Comment	Council's Response	Proposed Changes to the Plan
Object to the allocation and that the wording has not taken into account previous consultation comments.	We have considered all comments received during previous consultations and made amendments to the policy where considered appropriate. A response to all previous consultation comments can be found in the Consultation Statement published online.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
This site is within walking distance of university facilities and so should also encourage purpose built student accommodation in the indicative uses.	The allocated use reflects the planning permission uses, which do not include student accommodation.	No changes required.
Design criteria should be amended to be clearer how developments should respond to heritage significance, including taking into account views towards and from the conservation area.	We propose to add a reference to the need for development to be designed to respond to heritage assets.	Change proposed.
We note the Building Height Study sets an appropriate range of 12-54m. Planning permission has been granted for 74 metres, which will surely set a precedent for future development in the area.	The text indicates that the decision on the permitted scheme was based on an assessment of the impacts and benefits of that specific development and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development.	No change proposed.
Historic England would lie to understand how the 54m height suggested has been arrived at.	The Building Height Study, which forms part of the evidence base to the Plan, sets out potential heights have been determined.	No change proposed.
Criteria should make clear no car parking should be retained in Line with London Plan and local plan policies, particularly given the proximity to underground stations.	We propose to add a reference to removing existing on-site car parking.	Change proposed.
Urban greening reference should include a specific reference to new street trees	We propose to add a reference to new street trees.	Change proposed.
Support the public realm improvements contributions	Support welcomed.	No change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints – • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 - Water Quality, and would be	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
• Superficial Aquifer (Secondary A)	taken into account at the planning application stage.	

Policy S19 – 135 – 149 Shaftsbury Avenue

Summary of Comment	Council's Response	Proposed Changes to the Plan
Theatres Trust support the allocated uses for the site.	Support welcomed.	No change proposed.
Historic England welcome the identification of the site and support the intention to retain the listed building and enhance its features.	Support welcomed.	No change proposed.
Additional text should be added to the criteria regarding the assessment of the remaining historic fabric to state in order to conserve its special interest.	We propose to amend the policy to require that assessment of the remaining internal historic fabric should be undertaken prior to the submission of a planning application.	Change proposed.
Criteria relating to retaining the cinema / theatre use should be amended to state that any other uses should be subsidiary to the main use.	The policy states that development must retain the cinema / theatre use and ensure that any other use introduced should not compromise or restrict the viability or operation of the cinema / theatre.	No change proposed.
The criteria relating to any roof extension should specify that this should be no greater than one storey and set back.	The policy expects any roof extension to be of the highest architectural quality and be of a height and massing appropriate to the site's surroundings. It is not considered appropriate to specify the extent of any extension.	No change proposed.
Historic England suggest the reference to any roof extension should ensure any height and massing should 'complement and enhance the listed building'	We propose to add reference to any roof extension complementing and enhancing the listed building.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Not clear what the development is for this site.	The policy allocates the site for theatre, cinema and cultural use.	No change proposed.
The criteria relating to a roof extension clearly suggest a hidden objective for a tall inappropriate building on this site.	The policy expects any roof extension to be of the highest architectural quality and be of a height and massing appropriate to the site's surroundings. Any tall building proposal would need to be assessed against the Policy D2 - Tall Buildings and all other relevant policies.	No change proposed.
Thames Water indicate that further information would be required to assess the impact of the proposal.	This would be assessed at a planning application stage.	No change proposed.
The Environment Agency identified relevant Environmental constraints – • Bedrock Aquifer (unproductive) • Superficial Aquifer (Secondary A)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy S20 Agar Grove Estate

No representations were received on this site allocation

Policy S21 St Pancras Commercial Centre, Pratt Street

No representations were received on this site allocation

Policy S22 6 St Pancras Way

Summary of Comment	Council's Response	Proposed Changes to the Plan
The site is under construction and expected to be completed in December 2025. The project has a positive impact on the delivery of the Knowledge Quarter Strategy. The permeability of the scheme is welcomed.	Support welcomed	No change proposed.

Policy S23 Tybalds Estate

No representations were received on this site allocation

Policy S24 294 – 295 High Holborn

No representations were received on this site allocation

Policy S25 156 – 164 Gray's in Road

No representations were received on this site allocation

Policy S26 8 – 10 Southampton Row

No representations were received on this site allocation

Policy S27 60 – 67 Shorts Gardens and 14 – 16 Betterton Street

No representations were received on this site allocation

Policy S28 – Cockpit Yard and Holborn Library

Summary of Comment	Council's Response	Proposed Changes to the Plan
Supportive of the overall plan objectives in particular to enhance specialist and affordable workspace in the borough, but concerned this is not carried into the site allocations.	Support welcomed. We propose to add a reference to specialist and affordable creative and maker spaces in the allocation.	Change proposed.
Concerned about statement that the site is being taken forward by the Councils CIP. As this indicates that plans for the site have been progressed without Cockpit Arts (CA) involvement. Given CA status as long standing tenant and employer and the Councils emphasis on protection of such floorspace, this is disappointing.	We propose to remove the reference to CIP.	Change proposed.
Concerned as to why allocation is grouped with other sites either under construction or with planning permission approved.	We propose include a detailed policy on this site in the next version of the draft Plan.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Concerned that Class E Maker studios and Cockpit Arts are not acknowledged in the allocation and should be included.	We propose to amend the allocated uses to include creative and maker spaces and affordable workspace.	Change proposed.
It is vital to protect the creative workspaces in the Borough, particularly given the other policies S1, IE1, IE3, IE4 and SC2, stating there is limited availability. Due to the shortage CA would struggle to find alternative premises. The Allocation therefore undermines the approach of supporting the creative sector.	We propose to add reference to creative and maker spaces and affordable work space in the allocated uses for this site.	Change proposed.
The evidence base sets out the need to protect creative industries. London Plan policy supports the protection and continued growth of creative facilities. The employment policies E2 and E3 support the provision of a range of B uses, appropriate to needs the needs of small to medium sized enterprises and required reprovision of equivalent floor space or demonstrate it is not required. Cockpit Arts wish to continue their tenancy at the property, therefore request the policy be amended to reflect this.	We propose to add reference to creative and maker spaces and affordable work space in the allocated uses for this site. Tenancy is not a matter for the Local Plan.	Change proposed.

Policy S29 18 Vine Hill and 15-29 Eyre Street Hill

No representations were received on this site allocation

Policy S30 Middlesex Hospital Annex, 44 Cleveland Street

No representations were received on this site allocation

Policy S31 Central Somers Town

No representations were received on this site allocation

S32 - Chalton Street, Godwin and Crowndale Estate

Summary of Comment	Council's Response	Proposed Changes to the Plan
Do not support this densification that would result in the loss of the basketball court and green	Comment noted. Planning permission has been granted for the proposed development.	No change proposed.

Policy S33 Birkbeck College, Malet Street

No representations were received on this site allocation

Policy S34 Senate House (NE quadrant), Malet Street

No representations were received on this site allocation

Policy S35 20 Russell Square

No representations were received on this site allocation

Chapter 4 – Central Area

In total **350** representations were made on this chapter by **39** consultees. Of these, **35** representations were received via commonplace and **315** representations were received via email.

Representations on this policy were received from the following consultees:

- Adelaide Medical Practice
- Belsize Parkhill and Elsworthy Conservation Area Advisory Committee
- Bideford Ventures UK Ltd
- Big Yellow Storage company
- Camden Green Party
- Camden Mixed Development Ltd
- Camden Town Unlimited
- Campaign to Protect Rural England
- Canal & River Trust
- Dartmouth Park Neighbourhood Forum (DPNF)
- Environment Agency
- Eton Conservation Area Advisory Committee
- Folgate Estates
- Greater London Authority (GLA)

- Highgate Conservation Area Advisory Committee
- Historic England
- Joseph Homes
- Kentish Town Neighbourhood Forum (KTNF)
- Kilburn District co.
- KTR Car wash Ltd
- LabTech
- Mansfield Conservation Area Advisory Committee
- Metropolitan Police
- Network Rail
- NHS Healthy Urban Development Unit
- One Housing and countryside
- Places for London
- Primrose Hill Conservation Area Advisory Committee
- Regal London
- St George West London
- SEGRO
- Tazzeta Ltd
- Thames Water
- Transport for London (TfL)
- Unite Group
- University College London (UCL)
- UPS
- Woodland Trust
- Yoo Capital CFQ

Policy C1 Central Area

Summary of Comment	Council's Response	Proposed Changes to the Plan
Context / General		
The majority of development in Kentish Town understandably is on the Murphy and Regis Road sites, but there needs to be some alternative outlets (Plan B) if either development gets blocked for a length of time.	Comments noted. Other sites are allocated for development in this area and these are set out in the site allocations policies in the Plan.	No change proposed.
Welcome the statement in Policy C1 that "we will expect development to be taken forward in accordance with the Kentish Town Planning Framework", which recognises that the development must be "seamlessly integrated with surrounding neighbourhoods".	Support welcomed.	No change proposed.

Map 4 Public and private open space should be shown separately.	The map is intended to be used for illustrative purposes. More detailed information on open space designations is included on the Policies Map which is published separately.	No change proposed.
The Camden Goods Yard area boundary, should be defined in the emerging Local Plan and included on 'Map 1' and 'Hawkridge House – Central Area'	The Camden Goods Yard boundary is set in the adopted Supplementary Planning Guidance.	No change proposed.
Para 4.4 Add Hampstead Heath overground station.	We propose to update the supporting text to refer to Hampstead Heath overground station	Change proposed.
Need to engage with Camden Town Unlimited and Euston BID regarding BID area sites	Comment noted	No change proposed.
The Local Plan should clarify that any proposals to utilise the Trust's land or waterspace should involve the Trust at an early stage.	The Canal and River Trust would be consulted as a matter of course as part of relevant planning applications.	No change proposed.
The CYG Framework provides welcome stewardship of the area's landmark buildings and historic roots as epitomised in the surrounding conservation areas. However, this is not taken forward in the Development and Design Principles for allocated sites C7-12. Instead, emphasis is given to The Camden Building Height Study allowing tall buildings incompatible with the paragraphs about the areas rich heritage set out in the extracts outlined above.	We propose to amend the policies C7-C12 to include reference to giving regard to the Vision and Objectives set out in the CGY Framework. The Building Heights Study 2023 identifies sites in Camden where tall buildings may be an appropriate for of development. Heritage was a key consideration in identifying areas of search for tall buildings in Camden and formed part of the assessment criteria to guide decisions on the appropriateness of tall buildings within an area. Within the Camden Goods Yard Area sites C7, C10, and C11 have	Change proposed.

	been identified as locations where tall buildings may be an appropriate form of development. However, the policy for each of these sites states that the acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies. This would include policy D5 Heritage.	
The vision and requirement for new development on sites in Camden Goods Yard (CGY) to celebrate, preserve and enhance its heritage and historic roots should be re-instated in the various site allocations.	The site allocation policies for sites C7 – C12 include a number of requirements in relation to heritage and we propose to amend the policy to refer to the vision and objectives of the CGY Framework. Policy D5 Heritage would also apply.	Change proposed.
The Camden Draft New Local Plan makes no reference to the 13 streets that constitute the Mansfield Conservation Area.	The supporting text does not identify all of the conservation areas in Central Camden. No change is considered necessary.	No change proposed.
Policy refers to the proposed designation of Murphy's Yard (or Murphy's Site) as one of the places of 'opportunity' for the delivery of 1750 new homes, jobs and infrastructure for intensification and diversification in order to create a 'vibrant new neighbourhood.'	Comments noted.	No change proposed.
Support criteria A however the Plan requires clarification on how development will address issues of relative deprivation.	Policy C1 sets out the Council's overarching strategy for delivery growth in Central Camden. This policy should be read in conjunction with the rest	No change proposed.

	of the policies in the Plan, which together seek to deliver environmental, social and economic benefits for communities in Camden to address issues around inequality and deprivation.	
When considering development sites, any loss of ancient or veteran trees should not be permitted. The Ancient Tree Inventory (ATI) for the area may be incomplete and should be updated. Where ancient, veteran, and notable trees outside woods exist on site allocations suitable root protection areas should be designated, to comply with the requirements of the NPPF for the protection of irreplaceable habitats.	Any loss of trees would be assessed against Policy NE3 (Tree Protection and Planting)	No change proposed.
The introductory text to Chapter 4 highlights Central Camden's role in providing a supply of industrial land and employment opportunities and the potential to deliver new homes, jobs and infrastructure to support Camden's communities.	Comments noted.	No change proposed.
The large-scale industrial sites at Regis Road and Murphy's in Kentish Town are identified as particular locations where growth will be focussed, although we also encourage the Council to recognise the importance and potential of other, smaller-scale existing sites which provide a significant contribution towards the supply of industrial space in the borough.	Policy IE3 Industry recognises the range of industrial land in Camden and states that the Council will manage and protect the supply of industrial and warehousing land, recognising its value for a variety of business types,	No change proposed.
Why is half of the area in Conservation Areas? This seems excessive and makes it more	Comments noted. The Conservation Areas are not designated through	No change proposed.

difficult to build new houses we need.	the Local Plan. The Plan reflects the existing boundaries of approved Conservation Areas. Further information about conservation areas is available on our website Conservation areas - Camden Council	
Young people are being squeezed out of Camden by high housing costs and these policies exacerbate this.	We disagree that these policies exacerbate housing costs.	No change proposed.
Part A - Reference to 'substantial benefit' to Camden's communities needs to be justified or removed. We suggest that the first sentence is retained, and the second sentence is deleted.	We consider it reasonable for the Council to seek to ensure development brings substantial benefits to the borough. No change is considered necessary.	No change proposed.
Support the general aims of draft policies C1 and C2, which identify Regis Road as an allocated site for mixed-use development.	Support welcomed.	No change proposed.
At present, the policy wording seems slightly unrealistic and requires the sites to deliver a number of uses which are potentially not compatible and a wide range of infrastructure with no consideration of whether this is actually needed or is viable. The policy wording should instead reflect the Council's up to date evidence base and outline the Council's specific requirements for employment and residential floorspace for each site to ensure this is reflective of the Borough's housing and employment needs.	Policy C1 sets out the Council's overarching strategy for the Central Area. Further detail to guide the development of sites is set out in the site allocation policies. The plan has been subject to viability testing. No change to wording is considered necessary.	No change proposed.
Homes		
At paragraph D of Policy C1 reference is made to the expectation that the combined sites of Regis Road and the Murphy Site will deliver 1750 new homes.	Comments noted.	No change proposed.

It is also envisaged at paragraph J that these sites will be expected to include higher density provision for industry, logistics and other employment uses providing space for, and a significant increase, in employment, and so forth.		
More housing should be built in central Camden. The plan should go further to make it easier to build new housing units. Failure to increase housing supply is why housing is so unaffordable for young people.	Site allocations have been identified in this area for additional homes; however, the highly developed nature of the borough means that there is limited land available for this.	No change proposed.
We support the principal of part (F) where financial contributions towards housing could be used on Camden's housing estates.	Support welcomed.	No change proposed.
The current Draft Policy appears to consider Regis Road and Murphy Site as a single entity, referring to an overall housing requirement for both sites within Policy C1 and including almost identical requirements for the mix of uses set out under Policies C2 (Regis Road) and C3 (Murphy Site). We consider that this approach should be reconsidered and the Policy for each site should be site specific, acknowledging that the nature and character of each site is unique and that there should be different delivery expectations and requirements.	Policy C1 sets out the Council's overarching strategy for the Central Area. Criteria D states that development in Kentish Town will mainly be delivered through site allocations at Regis Road and the Murphy Site, which are expected to deliver approximately 1,750 new homes. Further detail to guide the development of these sites is set out individually and in detail in Policies C2 and C3, which have also been subject to viability testing. Policy C1 also states that Council will expect sites to be delivered in accordance with the site allocation policies. No change to wording is considered necessary.	No change proposed.
It should be made clear that the housing numbers set out in Policies C1 and C2 are indicative and that the appropriate density	Policy C1 sets out the Council's overarching strategy for the Central Area. Further detail to guide the development of	No change proposed.

will be determined through detailed capacity assessment	sites is set out in the site allocation policies. The capacities identified are indicative and the Plan sets out that these are not fixed figures that must be adhered to exactly. They have been identified on the basis of adopted frameworks, neighbourhood plan policies, existing permissions and design led site capacity work. No change to wording is considered necessary.	
Employment and the economy		
The Council should actively support the re-use and improvement of existing non-designated industrial sites for industrial (B2/B8/E(g)(iii)) purposes. The policy should provide sufficient support and flexibility to ensure these spaces meet identified needs and occupier requirements. Policy C1 in particular should highlight the importance of industrial sites within this part of the borough and the need to support their future improvement and re-use, given the variety of existing industrial sites within this area.	Policy C1 sets out the Council's overarching strategy for Central Camden. Policy IE3 Industry recognises the range of industrial land in Camden and states that the Council will manage and protect the supply of industrial and warehousing land, recognising its value for a variety of business types, while recognising the opportunities for some sites to be used more efficiently to deliver wider Local Plan objectives.	No change proposed.
Support the provision of more workspaces and homes that are needed in Kentish Town at Regis Road and Murphys sites but needs to be done with care. Both sites should not be overdeveloped or too high as this would destroy the important historic character. Additional facilities such as doctors surgeries, school places and sports facilities should be provided as current facilities are oversubscribed.	Comments noted. Policy C2 and Policy C3 set out the Council's requirements for these sites to guide their future delivery.	No change proposed.

Policy C1 should be more flexibly worded to consider the loss of office space. The circumstances for when the loss of office space for other town centre uses is appropriate should therefore be considered further.	Policy C1 sets out the Council's overarching strategy for the Central Area. The Council's detailed approach to managing the supply of office space in Camden is set out in Policy IE2.	No change proposed.
Support the principles contained in Policy C1, in particular those relating to the Camden Goods Yard area Part (E).	Support welcomed.	No change proposed.
Part (I) should include reference to 'where feasible' and 'subject to viability' at the end of the section.	The suggested additional wording is not considered necessary.	No change proposed.
Part (K) The reference to the protection of office stock should be dependent on whether the building is fit for purpose and subject to marketing.	Comments noted.	No change proposed.
Retail and Town Centres		
With regards to criteria M, KTNF has learned through dialogue with local businesses that current policies are making Kentish Town High Street unviable for a number of businesses, with independent retailers and chains not surviving. Some compromises on transport and parking are necessary. More use of pop-ups and meanwhile space is needed to offset non-used frontages.	Comments noted. Policy IE6 seeks to support town centres and high streets in Camden and states that we will support the use of vacant/ under-utilised properties for temporary ('meanwhile') uses that will benefit a centre's vitality and viability. Specific transport and parking measures on Kentish Town High Street are outside of the scope of the Local Plan. These comments have been passed on to the relevant Council services.	No change proposed.
This policy needs a clause guaranteeing compromises with residents over licensing times and night-time noise.	The licensing of premises is not a matter the Local Plan can control. We have passed these comments on to the relevant Council service. Policy A4 sets out the Council's approach to	No change proposed.

	managing noise to avoid significant adverse impacts on health.	
The majority of new retail development in the Central area of the borough is expected to be delivered through development in the Camden Goods Yard area. Opportunities for other town centre uses through allocation of the site as part of the town centre would complement and support planned growth and the balances of uses in the area.	Noted.	No change proposed.
A key part of the draft development strategy for Camden is to ensure that all development in the borough contributes to 'Good Growth'. The opportunity to include The Interchange with the town centres aligns with the vision for the area and creating a sustainable place	The Interchange building is not an established part of the town centre and is used currently as offices. We do not consider it should be included as part of Camden Town Centre at the current time.	No change proposed.
Recognition that Camden Town is a suitable Location for a diverse range of employment uses to build on the innovative and creative economy in Camden Town is supported.	Support welcomed.	No change proposed.
Infrastructure		
Criteria Oi states - The delivery of step free access at Kentish Town Underground and Thameslink Station; and Camden Town Underground Station." The plan should state whether this is the order of priority.	The list is not in order of priority.	No change proposed.
Oii. Eastern access to Gospel Oak Overground. The plan needs to be more specific on what type of access.	The Plan is considered to contain a sufficient level of detail, with further information contained within other plans and strategies.	No change proposed.
Oiv. "The delivery of the Heath Line, a new green connection between Hampstead Heath and	The Plan is considered to contain a sufficient level of detail, with further	No change proposed.

Kentish Town." This needs more clarity about the route and possible alternative green routes if the Murphy site isn't developed within a specific time frame.	information contained within the Kentish Town Framework.	
Ov. Public realm improvements in Kentish Town Centre. More details are required.	The Plan is considered to contain a sufficient level of detail, with further information contained within other plans and strategies.	No change proposed.
Oviii. "The delivery of an integrated care hub." This needs more explanation.	The Plan is considered to contain a sufficient level of detail, with further information contained within other plans and strategies.	No change proposed.
Oix. "The delivery of new social infrastructure, including public toilets, and cultural uses, as part of the development of the Camden Goods Yard area and the Regis Road and Murphy sites." More detail is required of what the cultural uses will entail.	The Plan is considered to contain a sufficient level of detail, with further information contained within other plans and strategies.	No change proposed.
Support points xii) and xiv) on improving access to nature and requiring urban greening and biodiversity enhancements.	Support welcomed.	No change proposed.
The Camden Highline can also form part of the green space obligations developers may have with regards to the following sites C7, C8, C9, C11, C12, C16 and C18.	Comment noted.	No change proposed.
Part O - Infrastructure Part i of the policy should be amended to also include Chalk Farm station.	We propose to amend the policy to include this.	Change proposed.
The policy should be updated to refer to the proposed Camden Town station capacity upgrade. TfL also anticipate a need to reinstate four tracks and a third platform on the North London line from the 2030s onwards to meet	We propose to update the policy to refer to the proposed Camden Town station capacity upgrade and plans to reinstate four tracks and a third platform on the North	Change proposed.

future passenger and freight demand, and provisions have been made in the disposal for this land to be returned to operational rail use when necessary. We recommend this is also reflected in this policy.	London line from the 2030s onwards.	
We support the creation of spaces safe and attractive for pedestrians and bicycle users. It should be ensured that development proposals improve permeability, and a map showing proposed walking and cycling routes would be beneficial.	Support welcomed. Policy T2 states that development should be easy and safe to move through ('permeable'), adequately lit and well connected to adjoining areas. We do not consider it necessary to include a map of proposed walking and cycling routes in the plan as this is set out in other Council plans and strategies.	No change proposed.
Reference should be made to improving access / exits at Camden Town tube station as it is very overcrowded and in need of updating	Policy C1 states that a key priority for the area is delivering step free access and capacity upgrades at Camden Town underground station	No change proposed.
Policy should incorporate the concept of Camden Nature corridor in its objectives as central Camden has a unique opportunity to plan for nature recovery networks and greater access to healthy nature rich spaces together with the Sites of Nature Conservation.	We propose to update the policy to refer to the Camden Nature Corridor.	Change proposed.
Support Policy C1 – Central Camden especially parts O. xi, xii xiii and xiv.	Support welcomed	No change proposed.
Support the ambitions for securing wider infrastructure improvements, however this needs to be carefully balanced with deliverability and viability considerations.	The policy makes clear that the Council will seek the provision of, and contributions to, the delivery of infrastructure, from appropriate development, therefore providing a sufficient level	No change proposed.

	of flexibility in its wording.	
Welcome that an integrated care hub is proposed for the South Camden and Central Camden. These should be provided on a long leasehold or freehold basis and to ensure its affordability and sustainability should be made available to the NHS at a peppercorn/discounted rent. As the needs of the NHS may change over time ongoing consultation with the ICB is required.	Comments noted.	No change proposed.
There has been a lack of discussion regarding assessment and assurance of appropriate GP/primary care provision once the project is complete on the Camden Goods Yard development. Representatives from Kajima have been trying to make contact with the LB Camden to discuss options for the modernization of our premises. Engagement on this matter is needed.	The demand for GP and primary care provision is being further assessed as part of the Infrastructure Delivery Plan work, The findings will then form part of the Local Plan evidence base and will inform an update to the Infrastructure Schedule in Appendix 1 of the Local Plan.	No change proposed.
The infrastructure priorities in the policy are not evidenced or required to make development acceptable in planning terms. They should be deleted from the Plan.	The policy makes clear that the Council will seek the provision of, and contributions to, the delivery of infrastructure, from appropriate development, therefore providing a sufficient level of flexibility in its wording. Further information to support the infrastructure requirements set out in this policy is provided in Appendix 1 of the draft Local Plan. The Council has also prepared an Infrastructure Delivery Plan to support the	No change proposed.

	delivery of the Local Plan.	
Update to refer to the proposed Camden Town station capacity upgrade and plans to reinstate four tracks and a third platform on the North London line from the 2030s onwards	We propose to update the policy as suggested.	Change proposed.

Policy C2 Regis Road and Holmes Road depot

Summary of Comments	Council's Response	Proposed Changes to the Plan
Context		
Support the approach to deliver a comprehensive masterplan	Support welcomed.	No change proposed.
Given the complexity of the land ownership wording should acknowledge that comprehensive redevelopment may come forward in phases.	We propose to amend the policy to acknowledge that redevelopment is likely to come forward in phases and to require a 'Phasing Plan'	Change proposed.
We consider that a comprehensive Regis Road masterplan should a be developed and reflected in a new Supplementary Planning Guidance to inform development in the short, medium and long term and inform the potential capacity of the site, land uses and infrastructure requirements.	We propose to amend the policy to refer to Addendum to the Kentish Town Framework being prepared.	Change proposed.
Object to the reference to not permitting applications submitted in advance of the comprehensive development that would prejudice the delivery of a comprehensive scheme.	Delivery of a comprehensive scheme for this site is considered essential for the effective delivery of the objectives for this site. We propose to amend the policy to clarify this position and expectations.	Change proposed.
No comprehensive planning permission has been submitted nor has a comprehensive masterplan been approved.	A masterplan is being prepared as an Addendum to the Kentish Town Framework.	Change proposed.
Policy should be amended to allow a piecemeal redevelopment	We propose to amend the policy to acknowledge	Change proposed.

Summary of Comments	Council's Response	Proposed Changes to the Plan
or phased implementation approach	that redevelopment is likely to come forward in phases and to require a 'Phasing Plan'	
Big Yellow wish to remain on the site, as they plan to develop their site for B8 and flexible office space. Currently subject to appeal	The policy seeks to retain existing businesses that wish to stay on site and requires a business retention or relocation strategy as part of the planning application for the site.	No change proposed.
Concerned about how the site can be redeveloped and the UPS logistics continue to operate.	The policy seeks to ensure that the operation of existing businesses is not compromised.	No change proposed.
Allocated Uses		
It is critical to protect existing industrial sites, (especially B8) due to the lack of opportunities to increase the supply.	The allocated uses include industrial uses and the policy seeks to retain uses that support the functioning of the CAZ.	No change proposed.
Site is considered suitable for purpose built student accommodation, given its location close to other purpose built accommodation and as a site identified as suitable for a tall building.	The allocated uses for this site prioritise the delivery of employment uses and self-contained homes to meet identified needs and housing delivery targets. The Local Plan identifies a need for student housing and identifies sites where we consider this use may be appropriate.	No change proposed.
Allocated uses should be amended to reflect the potential for creative and knowledge industries to be delivered as included in design principles and account for a significant proportion of employment in Kentish Town	The allocated uses refer to employment uses and the criteria refer specifically to creative and knowledge sectors.	No change proposed.
Support the employment criteria, emphasis on retaining current	Support welcomed.	No change proposed.

Summary of Comments	Council's Response	Proposed Changes to the Plan
businesses, promoting high density, supporting existing business clusters and role in supporting the CAZ		
Amend criteria relating to intensifying employment uses to remove 'industrial' and expand the light industrial, creative and knowledge industries.	The policy supports a mixed use development to create a vibrant and sustainable neighbourhood including intensifying industrial uses. This is a key objective of the Kentish Town Framework and Council strategy.	No change proposed.
This site provides significant industrial floorspace including B8, which should be retained through co location. And because of its location in the Central Services Area.	The policy promotes the retention and intensification of employment uses and supports the provision of a range of businesses including storage.	No change proposed.
Indicative capacity		
Support the 1000 additional homes, but should be expressed as indicative as more housing could be acceptable.	The allocation is clear that the housing capacity is indicative	No change proposed.
Policy should set out the capacity for the employment floor space, particularly as an employment-led scheme	The policy sets out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites	No change proposed.
Design Principles		
Support the intensification of industrial and other land uses through efficient design and co-location with housing.	Support welcomed.	No change proposed.
Support the employment criteria, emphasis on retaining current businesses, promoting high	Support welcomed.	No change proposed.

Summary of Comments	Council's Response	Proposed Changes to the Plan
density, supporting existing business clusters and role in supporting the CAZ		
Amend criteria relating to intensifying employment uses to remove 'industrial' and expand the light industrial, creative and knowledge industries.	The policy expects development to increase the range of business premises and sectors on site as part of a mixed use development. The policy promotes the intensification of industrial uses and other employment uses in line with our Inclusive Economy Policy IE3 (Industry)	No change proposed.
Affordable workspace provision should be clarified as being subject to viability as set out in Policy IE4	Affordable workspace provision would be assessed against Local Plan Policy IE4 (Affordable and Specialist Workspace).	No change proposed.
Concerned about the potential impacts of mixed use development next to intensive logistics and potential for complaints.	The policy states that development must ensure that non-employment uses do not compromise the operation of existing or future employment uses	No change proposed.
The Agent of Change principle which places responsibility for mitigating noise on the new development should be referenced.	The policy states that development must ensure that non-employment uses do not compromise the operation of existing or future employment uses. Local Plan Policy IE3 (Industry) also seeks to ensure the successful co-location of uses through innovative design approaches and to avoid non-employment uses compromising the operation of businesses in line with	No change proposed.

Summary of Comments	Council's Response	Proposed Changes to the Plan
	the 'Agent of Change' principle. Furthermore, it is intended that the Plan should be read as a whole and policies A1 (Protecting Amenity) and A4 (Noise) set out the Council's approach to the application of the Agent of Change principle and would be applied to all planning applications where this was a consideration.	
Support the principle of seeking to ensure that non employment uses do not compromise the operation of existing and future employment uses. This should clarify that it includes employment uses both within as well as surrounding area in order to be compliant with London Plan policies.	Support welcomed. Policy IE3 (Industry) seeks to ensure the successful co-location of uses through innovative design approaches and to avoid non-employment uses compromising the operation of businesses in line with the 'Agent of Change' principle.	No change proposed.
Policy wording about housing provision should be more flexible to allow for a range of types to reflect the housing needs study.	Self-contained housing is the priority use of the Plan and we have a clear target to meet The policy reflects this position as part of a mixed use development. Any alternative housing provision would be assessed on an individual basis.	No change proposed.
Support the requirements to provide affordable housing and housing for particular housing needs.	Support welcomed.	No change proposed.
As a large employer in the area, support the emphasis on retaining current businesses on site.	Support welcomed.	No change proposed.
Support but feel the requirement to provide provision for particular	Support welcomed.	No change proposed.

Summary of Comments	Council's Response	Proposed Changes to the Plan
needs, particularly older people could be made stronger.		
Object to the height being up to 52 metres or higher as out of keeping with the area and would blight the neighbourhood	The policy reflects the findings of the Camden Building Height Study. The acceptability of particular tall building proposals will be assessed against Policy D2 (Tall buildings) and other relevant development plan policies.	No change proposed.
Should remove reference to the possibility of additional height above the height range as undermines the historic character of the area.	This wording reflects that only parts of the site are covered by Strategic Views and so proposals need to be carefully assessed in relation to this, together with the Tall Building Policy D2.	No change proposed.
Reference should be made to a medium density development as 52m is considered too high.	The policy reflects the findings of the Camden Building Height Study. The acceptability of particular tall building proposals will be assessed against Policy D2 (Tall buildings) and other relevant development plan policies.	No change proposed.
Support the provision of additional access to the Regis Road Area.	Support welcomed.	No change proposed.
Would support the introduction of an access road at the Regis Road estate that would relieve pressure on Kentish Town Road.	The policy seeks to improve access into and around the area in a number of ways.	Change proposed.
Support the identification of the site as being potentially suitable for a tall building and that additional height above the proposed range may be appropriate subject to appropriate testing of local and strategic views	Support welcomed.	No change proposed.

Summary of Comments	Council's Response	Proposed Changes to the Plan
Support the commitment to developing east – west connectivity.	Support welcomed.	No change proposed.
TfL support the proposals to enhance permeability and walking and cycling routes to deliver a positive environment for active travel	Support welcomed.	No change proposed.
Support diversification of railway arch uses while enhancing the local public realm	Support welcomed.	No change proposed.
Support the promotion of a new public square but the location should be indicated as a constrained site.	Support welcomed. The precise location would be considered at the planning application stage.	No change proposed.
Support the protection of biodiversity and the creation of a biodiversity corridor	Support welcomed.	No change proposed.
Opportunities to increase permeability across the railway should be explored.	The policy support this.	No change proposed.
Infrastructure Requirements		
The recycling reprovision criteria should specify that redevelopment includes additional space to meet the growing needs of the circular economy	The policy requires the replacement of the maximum throughput available for the site.	No change proposed.
Support the retention of the recycling facilities, as a vital service for local people. Important to maintain the opening hours or extend these to improve access.	Support welcomed.	No change proposed.
Agree that the recycling centre and other council services should be re provided, but should be subject to assessment of their need and possible reprovision in other locations	The policy seeks to retain or re provide the recycling centre unless suitable compensatory sites are provided elsewhere that replace the existing service provision.	No change proposed.
Welcome the requirement to contribute towards improvements of Kentish Town and Gospel Oak stations.	Support welcomed.	No change proposed.
Policy should specifically refer to potential capacity upgrades at	We propose to amend the policy to refer to	Change proposed.

Summary of Comments	Council's Response	Proposed Changes to the Plan
Kentish Town station. Funding for feasibility work may also be required.	Kentish Town underground station.	
Reference to step free access should be applied to the tube station also	We propose to amend the policy to refer to Kentish Town underground station.	Change proposed.
Support the local approach to de carbonisation	Support welcomed.	No change proposed.
Refurbishment of Camden's buildings on site could be a flagship proposal for embodied energy	Proposals will be assessed against relevant policies CC2 (Retention of Existing Buildings) and CC3 (Circular Economy and Reduction of Waste)	No change proposed.
Proposed infrastructure requirements should be supported by detailed capacity studies to demonstrate that they are needed.	The policy sets out the key priorities for infrastructure requirements and these would be assessed in detail at the planning application stage.	No change proposed.
Thames Water envisage given the scale of development upgrades to the water supply and waste water networks are likely to be required.	Comment noted.	No change proposed.

Policy C3 Murphys Site

Summary of Comment	Council's Response	Proposed Changes to the Plan
Context		
Support the vision to create a vibrant sustainable new mixed use development.	Support welcomed.	No change proposed.
Support proposals that respond to the aspirations of the Dartmouth Park Neighbourhood Plan.	Comment noted.	No change proposed.
Two thirds of the site falls within the Dartmouth Park Neighbourhood Plan (DPNP) area and so the DPNP should be referenced alongside the Kentish Town Neighbourhood Plan.	The policy already contains a reference to the DPNP.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
This is a once in a generation opportunity to provide an attractive new neighbourhood, that should focus on supporting a cohesive community that reflects the surrounding areas.	Comment noted.	No change proposed.
Concerned as to how the existing industrial capacity will be calculated particularly given the recent London Plan Planning Guidance which potentially could include open storage space. This site specific considerations, including operational railway lines, access requirements for Network Rail and non-designated assets should be taken into account.	Comment noted. This will be assessed at the planning application stage.	No change proposed.
Allocated Uses		
As owners of the site, we are committed to maximising the delivery of housing. 750 equates to nearly one year's annual requirement. The type of housing provided should therefore be broader and include build to rent, co living, student accommodation and specialist housing not just permanent self-contained homes.	Permanent self-contained homes is the priority use of the Local Plan; however we propose to amend the policy for this site to include reference to student accommodation whilst still optimising the provision of self-contained housing.	Change proposed.
Should not try and squeeze more than 750 homes and 20,000 sqm, (existing quantum of industrial floorspace) on site as would lead to inappropriate forms and housing mix types.	The Policy seeks to deliver an employment-led mixed use scheme that optimises the potential for the site.	No change proposed.
Light industrial uses should be recognised as an appropriate form of industrial use.	The policy expects development to intensify industrial provision and provide other high density employment uses as part of a mixed use development. Criteria in the policy also identify that light industrial and creative sources can assist with contributing to the success of the area.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
The proposed uses should be broadened to allow for the widest amount of suitable employment use including office and research / development uses, education and healthcare floorspace as well as supporting retail and community uses. Site should be linked into the Knowledge Quarter and merging clusters of employment in Kentish Town.	The policy recognises that the provision of some office space and retail may be considered appropriate as part of the development of the area. However, the scale of provision of these uses should not compete with or harm existing centres and avoid changing the character of the site	No change proposed.
Office and research development, education and health care should specifically be included as would be successful from a masterplan placemaking and demand perspective, linking the site with the Knowledge Quarter and cluster of employment in Kentish Town	The policy promotes a mixed use development that intensifies industrial and other employment uses, together with homes and community uses and open spaces. These are the priority uses for the site. Other uses could be considered if they can be delivered as a part of the overall scheme.	No change proposed.
Life science should be promoted, recognising the demand identified in the Employment Land review evidence.	The policy promotes a mix of employment uses.	No change proposed.
Leisure uses should be identified as suitable, including a hotel and leisure uses (cinema)	The site is not considered an appropriate location for such uses as it is not within an identified town centre.	No change proposed.
Housing Capacity		
Support maximising housing provision on the site through co-location.	Support welcomed.	No change proposed.
The site is designated as an Industrial Area, equivalent to Local Strategic Industrial Site in the London Plan. Therefore the allocation should set out the amount of industrial space currently on the site and the amount expected post development. Policy should	The policy sets out the Council's overall development principles for the site. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
commit to producing a monitoring framework for industrial capacity.	precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Local Plan and the London Plan	
Design Principles		
Policy should recognise that it is not expected to provide industrial floor space beyond the existing quantum.	As a key regeneration site, the policy seeks to intensify industrial provision to increase or at least maintain industrial storage and warehousing capacity and provide additional high density employment uses.	No change proposed.
If there is any decrease in industrial floor space the quality of space and employment generating opportunities should be considered.	The policy seeks to intensify industrial provision to increase or at least maintain industrial storage and warehousing capacity and provide additional high density employment uses.	No change proposed.
Support a vision that provides affordable and start up space on site. But given the scale of this site a bespoke and creative affordable strategy should be required, to allow an appropriate strategy to be agreed through any future masterplan approach	Comment noted. This would be considered at the planning application stage.	No change proposed.
The reference to large floor plates and corporate office not be considered suitable is not defined or justified and should be removed.	Due to the location, and character and industrial designation of the site it is not considered an appropriate location for large floorplate offices.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Object to the height suggestion anywhere in the conservation area and near Hampstead Heath. Height should be restricted to a maximum of 24m (8 floors)	The Building Height Study recommends a potential range of heights across the site and any application would be assessed against the Policy D2 (Tall Buildings)	No change proposed.
There was no height reference indicated, which is a critical issue.	Comment noted. The Building Heights Study reference appeared on the version of the Plan on the commonplace website. However, there was a typographical error in the PDF Local Plan version and some bullet points were omitted including the Building Heights Study reference. The text will be included in the next version of the Plan.	Change proposed. to correct typographical error.
Any tall buildings should respond to the five conservation areas, create a liveable human scaled development	The acceptability of particular tall building proposals will be assessed against the Policy D2 (Tall Buildings), Policy D5 (Heritage) and all other relevant policies.	No change proposed.
Object to the identification as a site suitable for tall buildings. The area is predominantly low rise 2-4 storeys	The allocation reflects the findings of the Camden Building Height Study, which identified the site as a location where tall buildings may be an appropriate form of development. The acceptability of particular tall building proposals will be assessed against Policy D2 (Tall buildings) and other relevant policies.	No change proposed.
Object to any buildings over 8 storeys and against the railway line where they will spoil the views.	As set out in the allocation, the acceptability of particular tall building proposals,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	and their location within the site, will be assessed against Policy D2 (Tall buildings) and other relevant plan policies	
Development should seek to avoid clustering tall buildings next to the railway line where sounds of trains will bounce of buildings and magnify to uncomfortable levels for wearers of hearing aids	The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall buildings) and other relevant plan policies including Policy N4 (Noise and vibration).	No change proposed.
Housing provision should include a mix of housing tenures and types, including co-operative housing, co-housing and family housing	The mix of housing in any development scheme would be assessed against the relevant Housing policies in the Local Plan.	No change proposed.
The inclusion of extra care and supported housing for those with learning difficulties is supported, but will need to assessed as part of financial viability testing.	Support welcomed. Comment noted.	No change proposed.
There is a protected view from Hampstead Heath.	Comment noted. We propose to update the policy to mention the protected strategic view.	Change proposed.
The preservation of open views from Hampstead Heath are a major concern.	Comment noted.	No change proposed.
Design of the redevelopment should reflect the surrounding area's character	The policy seeks to ensure the design and materials used are informed by the history of the site as a former Goods Yard.	No change proposed.
Design should respect the protected view of Hampstead Heath from Kentish Town as set out in the Neighbourhood Plan.	The policy states that development must take views into account in accordance with the Neighbourhood Plan.	No change proposed.
Reference to a new green corridor linking Kentish Town Road and Hampstead Heath could include	Comment noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
exploring links to Camden High Line, through signage.		
Could include examples of how development could be designed to be compatible with and facilitate development of Regis Road.	The compatibility with adjacent sites would be considered at the planning application stage.	No change proposed.
Concerned about increased traffic and air pollution during and after development	Local Plan policy A1 (Amenity) would consider construction impacts and at the planning application stage the Council would consider the cumulative impacts of the construction including potential impact on and damage to highways assets and the need for a construction management plan.	No change proposed..
Support the plans to deliver improved walking and cycling routes across the site and connecting to neighbouring sites as railway and lack of permeability present significant challenges.	Support welcomed.	No change proposed.
Should provide an exemplar of healthy, sustainable and genuinely zero carbon development	Comment noted. Any development proposal would be assessed against all relevant policies including those relating to sustainability. .	No change proposed.
A buffer zone should be required between the mature trees adjacent to the northern boundary and any development on site	The policy seeks to protect and enhance the biodiversity corridor along the north of the site and Local Plan policy NE3 (Tree Protection and Planting) would seek to protect the trees.	
Support requiring biodiversity and note the potential of the railways corridor for habitat connectivity.	Support welcomed.	No change proposed.
The policy refers to temporary meanwhile uses; these should be free to some community groups	The policy expects a 'meanwhile use strategy' to be submitted, this would be expected to	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	respond to local needs and priorities and be offered at low cost.	
Infrastructure Requirements		
Policy should clarify how will the improvements to Kentish Town Thameslink and Gospel Oak be funded?	The policy seeks financial contributions towards these improvements from any development scheme.	No change proposed.
Welcome the requirement to contribute towards improvements of Kentish Town and Gospel Oak stations.	Support welcomed.	No change proposed.
Funding for feasibility work may also be required for Gospel Oak Station	Comment noted. The policy seeks a financial contribution towards improvements.	No change proposed.
Support the ambitions to secure wider infrastructure contributions, but needs to be balanced with deliverability and viability considerations including the high CIL rates, which should be acknowledged	Comment noted. This would be considered at the planning application stage.	No change proposed.
The reference to facilitating a link across the railway line to link both Murphys and Regis Road is supported but should note that this requires land owned by a third party and detailed feasibility cannot be guaranteed.	Supported welcomed. Comment noted.	No change proposed.
Support the commitment to limiting the availability of car parking for alternative uses and the car free approach	Support welcomed.	No change proposed.
A transport strategy should be developed to explore new access points, freight consolidation, servicing and limiting traffic	We propose to amend the policy to make reference to these matters.	Change proposed.
Policy should recognise the need for sustainable / active transport including delivery hubs.	The policy promotes sustainable and active transport. The policies in Chapter 14 - Safe, Healthy and Sustainable Transport would also apply.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Network Rail must retain unrestricted access across the site in order to gain access to the railway.	Noted.	No change proposed.
What improvement to Greenwood Place are envisaged?	The detail of improvements to Greenwood Place required by the policy would be considered at the scheme design / planning application stage.	No change proposed.
Thames Water envisage given the scale of development upgrades to the water supply network are likely to be required. But raise no concerns regarding wastewater networks.	Comment noted.	No change proposed.

Policy C4 Kentish Town Police

Summary of Comment	Council's Response	Proposed Changes to the Plan
The site is not within the Regis Road Growth Area, which proposes a housing targets of 1000 additional homes. This will lead to increased requirements on policing. This station plays a critical role in this policing and therefore should be a priority in the policy.	The policy supports the continued use of the site for police facilities and ensures that police operational requirements are not compromised.	No change proposed.
The criteria relating to development addressing both Holmes Road and Regis Road and the provision of a cycle and pedestrian route across the site between Holmes Road and Regis Road will impact on the operation of the site if located to the west of the site. A route via the Section house on the eastern side would be preferable. Or there are	Comment noted. The policy does not specify a route for the pedestrian and cycle link between Holmes Road and Regis Road and recognise that police operational requirements should not be compromised by development.	No change.

Summary of Comment	Council's Response	Proposed Changes to the Plan
alternative opportunities to achieve this outside of the site.		
The retention of the Section House should be removed as it is not possible to retain this and provide the cycle / pedestrian route and a viable scheme.	The retention of the Section House is in accordance with Local Plan Policy CC2 (Repurposing, Refurbishment and Re-use of Existing Buildings). Any proposal to demolish would need to be assessed against this policy.	No change proposed.
A footpath / cycle link to the east of the Section House or further west on Holmes Road can be delivered and would have more benefits, including more permeable to the High Street and being compliant with the Designing out crime principles and avoiding a steep slope.	Comment noted. These options are outside of the boundary of this site.	No change proposed.
The Section House should be considered to be used as a small self-contained homes for elderly and students, given its proximity to the High Street. Schemes in Netherlands support lower rents for student in exchange for spending time and support to their elderly neighbours.	We propose to amend the allocated uses to include reference to student accommodation.	Change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.

Policy C5 (KT5) 369-377 Kentish Town Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
The background section should make clear the full details of the	We propose to update the context section to	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
planning permission and that it is extant for perpetuity.	provide more information on the extant permission.	
The development and design principles should only come into effect if alternative proposals other than those approved were to come forward and not delivered to completion.	We propose to amend the policy to clarify that policy will be used to determine future planning applications on this site in the event that the existing planning permission is not delivered to completion.	Change proposed.
The footpath widening was completed by the Highway Authority in 2019 and has been delivered. Any alternative development should therefore not be required to further set back.	Comment noted. We propose to update the policy to reflect this.	Change proposed.
TfL support the widening of the pavement.	Support welcomed. This widening of the pavement has already been delivered, and therefore is no longer a policy requirement.	Change proposed.
Any relocation of the existing bus shelter would require consultation with TfL.	Comment noted.	No change proposed.
Where would the relocated bus stops be?	This would need to be agreed at planning application stage in consultation with TfL	No change proposed.
The aspiration for the Heath line should not be at the expense of the extant permission.	The policy criteria would only apply to any new proposed development if the extant planning permission is not built.	No change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.

Policy C6 – Kentish Town Fire Station

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support the requirement for tree retention and increased urban greening	Support welcomed.	No change proposed.
The training tower is a local landmark and it will be necessary to keep for practical reasons.	The need to retain the training tower is a matter for the London Fire Brigade to consider as part of their operational needs assessment for the site.	No change proposed.
Plan should specify what is meant by 'alternative community use'	It is not considered appropriate for the Plan to specify an alternative community use. Community use would only be considered for the site if the existing fire station is declared surplus to the operational needs of the London Fire Brigade. The allocation reflects the current intention of the Fire Brigade to continue to use the site for a fire station. The appropriateness of any alternative community use would be considered against Policy SC3 – Social and Community Infrastructure.	No change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.

Policy C7 – Morrisons Supermarket

Summary of Comment	Council's Response	Proposed Changes to the Plan
Context		
The background information should reflect the latest planning permissions which have increased the housing supply. Any additional commercial floorspace generated across the site as part of the masterplan approach should be able to use these additional dwellings to offset the housing requirement under Policy H2 as agreed in 2022/3646/P.	We propose to update the background section to reflect the latest planning permission.	Change proposed.
The vision and requirement for new development in the Camden Goods Yard to celebrate, preserve and enhance its heritage and historic roots should be re-instated.	We propose to add reference to the vision of the adopted Camden Goods Yard Supplementary Planning Document.	Change proposed.
Whilst celebrating the heritage of the former Goods Yard is referenced, establishing historical links could be stronger.	The policy refers to opportunities to reference both national, local and lost historical features.	Change proposed.
The policy and development should celebrate the heritage of the former Goods Yard more. This could include naming of roads, together with design that capstans, lamp standards and turntables used in this major goods yard.	The policy states that development must be designed to reference the industrial and transport heritage and celebrate the site's heritage significance.	No change proposed.
Development and Design Principles		
Support the requirement to co-ordinate delivering the adjacent allocations given the presence of heritage assets, listed buildings and conservation areas.	Support welcomed.	No change proposed.
Strongly support the removal of existing car parking on site.	Support welcomed.	No change proposed.
A reduced amount of car parking for the new supermarket has been agreed and will be delivered as part of the first phase in 2025. Reference to removing existing car parking should therefore be removed.	A reduced amount of car parking was agreed as part of the permission based on the details of that specific application. Reference to subsequent proposals remove	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	existing parking is consistent with the car free approach set out in policy T1.	
The height of the building being constructed is higher than the Building Height Study range and has a significant impact on views in and around the adjacent conservation area.	The application was considered on its merits, prior to the publication of the Building Heights Study. We propose to clarify the position regarding the consideration of building height in any future application.	Change proposed.
Not clear how maximum heights have been arrived at and what the impacts are on heritage assets.	The Building Heights Study sets out this information.	No change proposed.
The reference to building heights should be amended to reflect the permitted height of 56 m	We propose to add reference to the permitted height.	Change proposed.
Support the requirement for new wildlife areas and the potential for improving habitat connectivity. This could be strengthened with the inclusion of new tree planting.	Support welcomed. We propose to amend the policy to refer to tree planting	Change proposed.
The Canal is designated as a site of metropolitan importance for nature conservation and there is scope for environmental improvements to enhance biodiversity together with early consultation with Canal & Rivers Trust.	Comment noted. This site is not adjacent to the Canal.	No change proposed.
Infrastructure Requirements		
Reference to a new route along the West Coast mainline should be removed as an approved landscape scheme is being delivered and the reference to the connection between Regents Park Road bridge and canal towpath should be amended to 'explore opportunities' rather than contribute to.	The new route is a relevant objective for any further planning application.	No change proposed.
The application under construction fully delivers new pedestrian and cycle linkages, therefore the spinal	Comment noted. The route requirement would	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
route requirement should be clarified.	apply to any new application.	
Given the increase in people on the Canal towpath this development will bring, it is considered appropriate for a financial contribution to improved access to and along Regents Canal.	The policy sets out the infrastructure priorities for this site. Appropriate contributions will be assessed at the planning application stage.	No change proposed.
As a contribution is sought for the Stephenson's Walk, (which will bring more people onto the canal towpath), it is considered appropriate for a contribution to improved access to and along Regents Canal to be added.	The policy sets out the infrastructure priorities for this site. Appropriate contributions will be assessed at the planning application stage.	No change proposed.
The responsibility for engaging all relevant parties in relation to the provision of bus stands should be on TfL not the applicants.	The responsibility remains with the applicant if a new application is submitted.	No change proposed.
Access to bus networks should be included as part of the design principles and the infrastructure requirements should recognise the need to protect bus operations, minimise delays and improve access to the bus network.	The policy seeks to ensure that accessibility to bus services is maintained	No change proposed.
Has enough consideration been given to GP and primary care provision from all these new residents? As the closest GP practice, (Adelaide Medical Centre) we do not feel that the impact on us has been fully considered and that the Council should have consulted earlier.	The demand for GP and primary care provision is being further assessed as part of the Infrastructure Delivery Plan work, The findings will then form part of the Local Plan evidence base and will inform an update to the Infrastructure Schedule in Appendix 1 of the Local Plan.	No change proposed.
Healthcare provision should be reviewed if any subsequent planning applications are submitted.	Comment noted.	No change proposed.
Thames Water envisage given the scale of development upgrades to the water supply and wastewater networks are likely to be required.	Comment noted. This is identified in the allocation.	No change proposed.

Policy C8 – Former Morrisons Petrol Filling Station

Summary of Comment	Council's Response	Proposed Changes to the Plan
The vision and requirement for new development in the Camden Goods Yard to celebrate, preserve and enhance its heritage and historic roots should be re-instated.	We propose to amend the policy to refer to the vision of the adopted Camden Goods Yard Supplementary Planning Document.	Change proposed.
Object to the inclusion of permanent self-contained housing in the allocated uses as the site is too small to accommodate multiple land uses and will impact viability.	Self-contained housing is the priority use of the Local Plan and it considered reasonable for any development to contribute to housing. The policy recognises that in the development permitted, the housing contribution is included within the development of the Morrisons supermarket site (Allocation C7)	No change proposed.
Reference to setting the building line back from Chalk Farm Road should be removed as the site has been designed to improve the experience of pedestrians and cyclists across the site and this part of the town centre is not overcrowded.	Improving the pedestrian environment remains a key objective for the area. This objective would only be relevant to any new application for the site.	No change proposed.
The policy should include controls over the height of new development given the surrounding conservation areas and historic views	Any application would be considered against Local Plan Policies D1 – Achieving Design Excellence, D2 – Tall Buildings, D5 - Heritage, and all other relevant policies.	No change proposed.
A better gateway should be required into the site, given the bottleneck caused by the passage under the North London Line.	The policy states that development must create a new and inviting gateway to the site.	No change proposed.
Should include an additional requirement to maximise urban greening and tree planting	We propose to amend the policy to refer to greening and tree planting.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Has enough consideration been given to GP and primary care provision from all these new residents? As the closest GP practice, (Adelaide Medical Centre) we do not feel that the impact on us has been fully considered and that the Council should have consulted earlier.	The demand for GP and primary care provision is being further assessed as part of the Infrastructure Delivery Plan work, The findings will then form part of the Local Plan evidence base and will inform an update to the Infrastructure Schedule in Appendix 1 of the Local Plan.	No change proposed.
Insufficient information has been provided for Thames Water to make an assessment of the impact of the site allocation on the water network infrastructure and sewage treatment works.	Comments noted. We propose to update the policy accordingly to reflect this.	Change proposed.

Policy C9 – 100 Chalk Farm Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
The vision and requirement for new development in the Camden Goods Yard to celebrate, preserve and enhance its heritage and historic roots should be re-instated.	We propose to amend the policy to refer to the vision of the adopted Camden Goods Yard Supplementary Planning Document.	Change proposed.
Support the requirement to have regard to areas historic context and importance of local views.	Support welcomed.	No change proposed.
Strongly support the policy as being suitable flexible.	Support welcomed.	No change proposed.
Allocated uses		
Should include a provision to provide an appropriate quantum of Class E floorspace to allow for flexible ground floor active uses rather than just employment use.	The policy sets out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Uses that increase activity from the current low intensity office will lead to substantial harm to the surrounding residential areas.	Any application will be considered against all relevant policies including Local Plan Policy A1 – Protecting Amenity, which seeks to protect the quality of life of occupiers and neighbours and resists development that would cause unacceptable harm to amenity.	No change proposed.
Capacity		
The indicative capacity of 100 is supported but should include 'or equivalent as a minimum'. This would acknowledge the link between student housing and private rented housing	We propose to amend the capacity to reflect the recent planning permission including self-contained homes and student accommodation. We also intend to add text to the Introduction of the Plan to clarify that a larger number of homes than the indicative capacity in a site allocation may be supported where the proposed quantity is appropriate to the local context and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.	Change proposed.
Development and Design principles		
Welcome the requirements for high quality design, having regard to the areas historic context and assessing the impact of proposals on locally important views.	Support welcomed.	No change proposed.
The policy should include controls over the height of new development given the surrounding conservation areas and historic views	Any application would be considered against Local Plan Policies D1 – Achieving Design Excellence, D2 – Tall Buildings, D5 - Heritage,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	and all other relevant policies.	
Identifying the site as a high street location is misconceived, it is closer to the Neighbourhood Centre than Camden High Street.	The site is within Camden Town town centre as designated in the adopted Local Plan.	No change proposed.
The principles should state that the proximity to the Roundhouse as an entertainment venue do not justify proposals to intensify or add nighttime economy activities, which will exacerbate existing noise and disturbance and anti-social behaviour in the adjacent conservation and residential areas.	Any application would be considered against all relevant Local Plan Policies including Policy A1 – Protecting Amenity and Policy A4 - Noise and Vibration	No change proposed.
Historic England request changes to the wording relating to impacts on the Roundhouse and should include specific reference to views towards the Roundhouse from the north and west.	We propose to add specific reference to views of the Roundhouse.	Change proposed.
Should refer to the historic great wall from 1856 that should be preserved.	The policy requires schemes to respond to the area's historic context, which would include the wall. The impact of proposals on heritage would be considered in line with Policy D5 – Heritage.	No change proposed.
Should include an additional requirement to maximise urban greening and tree planting	We propose to amend the policy to refer to greening and tree planting	Change proposed.
Infrastructure requirements		
TfL support the public realm improvements and welcome the removal of existing car parking.	Support welcomed.	No change proposed.
TfL request that given the location the policy should safeguard future access to Chalk Farm Station to enable step free access and capacity improvements if required.	Comments noted. We propose to amend the policy to refer to development contributing towards a feasibility study and delivery of step free access.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Has enough consideration been given to GP and primary care provision from all these new residents? As the closest GP practice, (Adelaide Medical Centre) we do not feel that the impact on us has been fully considered and that the Council should have consulted earlier.	The demand for GP and primary care provision is being further assessed as part of the Infrastructure Delivery Plan work, The findings will then form part of the Local Plan evidence base and will inform an update to the Infrastructure Schedule in Appendix 1 of the Local Plan.	No change proposed.
As the site is allocated for student accommodation, there are specific health requirements such as increased mental and sexual healthcare. Any proposal must comply with Policy H9 – Student Housing	Comment noted.	No change proposed.
Thames Water envisage given the scale of development upgrades to the water supply network are likely to be required. But raise no concerns regarding waste water networks.	We propose to amend the policy to refer to water supply.	Change proposed.

Policy C10 Juniper Crescent

Summary of Comment	Council's Response	Proposed Changes to the Plan
The vision and requirement for new development in the Camden Goods Yard to celebrate, preserve and enhance its heritage and historic roots should be re-instated.	We propose to amend the policy to refer to the vision of the adopted Camden Goods Yard Supplementary Planning Document.	Change proposed.
The indicative residential capacity should be increased as design studies indicate that around 380 additional homes could be provided and more houses are needed to address viability.	We propose to amend the indicative capacity to 375 to reflect the most up to date capacity work undertaken.	Change proposed.
Affordable housing for older or vulnerable people should be listed	The design principles already mention housing	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
as a requirement under the design principles.	for older or vulnerable people.	
Development and Design Principles		
Historic England request changes to the wording relating to impacts on the Roundhouse and should include specific reference to views towards the Roundhouse from the north and west.	Comments noted. We propose to update the policy accordingly to reflect this.	Change proposed.
A balance is needed between the need for affordable housing and safeguarding the historic and landmark buildings. Tall buildings cannot be part of that balance the Building Heights Study reference should be removed.	The Plan reflects the results of the Camden Building Heights Study carried out to ensure consistency with the London Plan. The policy makes clear that the acceptability of particular tall building proposals will be assessed against Policy D2 on tall buildings and other relevant policies, which would include Policy D5 on Heritage.	No change proposed.
Welcome the tall building guidance	Support welcomed.	No change proposed.
TfL support the rationalising car parking and allowing for repurposing when no longer required. It should be stated that this is when existing permits expire or existing residents move out with an overarching aim to be eventually car free. This should be accompanied by a Parking Design and Management Plan.	Support welcomed. We propose to add a reference in the policy to rationalising parking on-site in line with Policy T5 (Parking and car free development).	Change proposed.
Amend the reference to rationalising parking from 'in line' to 'taking into account'	The wording used is consistent with other policies. No change is required.	No change proposed.
Proposals should have regard to the location of bus stops and stands as necessary.	Comment noted	No change proposed.
Infrastructure Requirements		
Support the requirement to provide additional green space,	Support welcomed. We propose to amend the	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
wildlife areas and the corridor for habitat connectivity. This could be strengthened with the inclusion of additional tree planting.	policy to refer to tree planting	
Amend the reference' to contributing towards delivery' of the spinal route for pedestrians to read 'demonstrate how proposals will help deliver'. This will be delivered over time and so should allow each site to demonstrate how they can deliver their part.	Delivery of this route is a key objective for the area and the Goods Yard Framework. Reference to "contributing towards delivery" is considered appropriate.	No change proposed.
The provision of Stephenson's Walk will be critical to the future well being of this community and must be secured.	Comment noted.	No change proposed.
As a contribution is sought for the Stephenson's Walk, (which will bring more people onto the Canal towpath), it is considered appropriate for a contribution to improved access to and along Regents Canal to be added.	The policy sets out the infrastructure priorities for this site. Appropriate contributions will be assessed at the planning application stage.	No change proposed.
Amend the reference' to contributing towards delivery' of the pedestrians and cycle route adjacent to the West Coast trainline to read 'demonstrate how proposals will help deliver' This will be delivered over time and so should allow each site to demonstrate how they can deliver their part.	Delivery of this route is a key objective for the area and the Goods Yard Framework. Reference to "contributing towards delivery" is considered appropriate.	No change proposed.
Given the increase in people on the Canal towpath this development will bring, it is considered appropriate for a financial contribution to improved access to and along Regents Canal.	The policy sets out the infrastructure priorities for this site. Appropriate contributions will be assessed at the planning application stage.	No change proposed.
Has enough consideration been given to GP and primary care provision from all these new residents? As the closest GP practice, (Adelaide Medical Centre) we do not feel that the impact on us has been fully	The demand for GP and primary care provision is being further assessed as part of the Infrastructure Delivery Plan work, The findings will then form part of the Local Plan	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
considered and that the Council should have consulted earlier.	evidence base and will inform an update to the Infrastructure Schedule in Appendix 1 of the Local Plan.	
Thames Water envisage given the scale of development upgrades to the water supply and wastewater networks are likely to be required.	Comment noted. This is identified in the allocation.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy C11- Network Rail land at Juniper Crescent

Summary of Comment	Council's Response	Proposed Changes to the Plan
The vision and requirement for new development in the Camden Goods Yard to celebrate, preserve and enhance its heritage and historic roots should be re-instated.	We propose to amend the policy to refer to the vision of the adopted Camden Goods Yard Supplementary Planning Document.	Change proposed.
The Canal is designated as a site of metropolitan importance for nature conservation and there is scope for environmental improvements to enhance biodiversity together with early consultation with Canal & Rivers Trust.	Comment noted. This site is not adjacent to the Canal.	No change proposed.
Support the flexibility in the policy to allow for continued operational railway use or future redevelopment.	Support welcomed.	No change proposed.
The reference in the Building Height Study to the potential impact on Primrose Hill Conservation Area should be included in the allocation text	The potential impact on the conservation area would be taken into account at the planning application stage, when considered against Local	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	Plan Policy D5 – Heritage. Additional text from the Building Heights Study is not considered necessary in the policy.	
Support the recognition of the railway corridor for habitat connectivity.	Support welcomed.	No change proposed.
Support the establishment of a green corridor along the railway given the loss of Adelaide Nature Reserve.	Support welcomed.	No change proposed.
Given the increase in people on the Canal towpath this development will bring, it is considered appropriate for a financial contribution to improved access to and along Regents Canal.	The policy sets out the infrastructure priorities for this site. Appropriate contributions will be assessed at the planning application stage.	No change proposed.
As a contribution is sought for the Stephenson's Walk, (which will bring more people onto the canal towpath), it is considered appropriate for a contribution to improved access to and along Regents Canal to be added.	The policy sets out the infrastructure priorities for this site. Appropriate contributions will be assessed at the planning application stage.	No change proposed.
Has enough consideration been given to GP and primary care provision from all these new residents? As the closest GP practice, (Adelaide Medical Centre) we do not feel that the impact on us has been fully considered and that the Council should have consulted earlier.	The demand for GP and primary care provision is being further assessed as part of the Infrastructure Delivery Plan work, The findings will then form part of the Local Plan evidence base and will inform an update to the Infrastructure Schedule in Appendix 1 of the Local Plan.	No change proposed.
TfL are concerned that the requirement for bus turning area goes beyond the existing agreed requirements and would have significant financial impacts.	We propose to update the policy to clarify that a turning area is intended to be an example of a possible measure not a requirement.	Change proposed.
The Environment Agency identified relevant Environmental constraints	Comment noted. This is covered by Local Plan Policy NE4 – Water	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
• Bedrock Aquifer (unproductive)	Quality, and would be taken into account at the planning application stage.	

Policy C12 Gilbeys Yard

Summary of Comment	Council's Response	Proposed Changes to the Plan
The vision and requirement for new development in the Camden Goods Yard to celebrate, preserve and enhance its heritage and historic roots should be re-instated.	We propose to amend the policy to refer to the vision of the adopted Camden Goods Yard Supplementary Planning Document.	Change proposed.
Reference should be made to the Canal being of Metropolitan importance for nature conservation.	We propose to add reference to the Canal being a site of importance for nature conservation.	Change proposed.
Welcome the identification of particular housing needs identified by H6C. A specific proportion of the total units should be identified to ensure deliverability.	Support welcomed. The specific number of units would be assessed at the planning application stage.	No change proposed.
TfL welcome the requirement to rationalise car parking on site. This should also clearly state the overarching aim is to be eventually car free and so as existing permits expire or existing residents move out. This could be accompanied by a Parking Design and Management Plan.	Support welcomed. We propose to add a reference in the policy to rationalising parking on-site in line with Policy T5 (Parking and car free development).	Change proposed.
Recognition that residents parking will need to be provided is welcomed as was of fundamental importance to residents in supporting redevelopment. Amend the criteria relating to Policy T5 (parking and car free development) from 'in line with' to 'taking account of' to avoid any conflict with the approach	Support welcomed. It is not considered necessary to amend the wording as proposed.	No change proposed.
Amend the reference 'to contributing towards delivery' of	Delivery of this route is a key objective for the area	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
the pedestrians and cycle route adjacent to the West Coast trainline to read 'demonstrate how proposals will help deliver' This will be delivered over time and so should allow each site to demonstrate how they can deliver their part.	and the Goods Yard Framework. Reference to "contributing towards delivery" is considered appropriate.	
Support the requirement to provide additional green space, wildlife areas and the corridor for habitat connectivity. This could be strengthened with the inclusion of additional tree planting.	Support welcomed. We propose to amend the policy to refer to tree planting	Change proposed.
Given the increase in people on the Canal towpath this development will bring, it is considered appropriate for a financial contribution to improved access to and along Regents Canal.	The policy sets out the infrastructure priorities for this site. Appropriate contributions will be assessed at the planning application stage.	No change proposed.
As a contribution is sought for the Stephenson's Walk, (which will bring more people onto the canal towpath), it is considered appropriate for a contribution to improved access to and along Regents Canal to be added.	The policy sets out the infrastructure priorities for this site. Appropriate contributions will be assessed at the planning application stage.	No change proposed.
Has enough consideration been given to GP and primary care provision from all these new residents? As the closest GP practice, (Adelaide Medical Centre) we do not feel that the impact on us has been fully considered and that the Council should have consulted earlier.	The demand for GP and primary care provision is being further assessed as part of the Infrastructure Delivery Plan work, The findings will then form part of the Local Plan evidence base and will inform an update to the Infrastructure Schedule in Appendix 1 of the Local Plan.	No change proposed.
Thames Water envisage given the scale of development upgrades to the water supply network are likely to be required. But raise no concerns regarding wastewater networks.	Comment noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy C13 West Kentish Town Estate

Summary of Key Issues Raised	Council's Response	Proposed Changes to the Plan
Welcome the recognition of the need to regenerate the area in accordance with the Gospel Oak and Haverstock Community Vision as this suggests appropriate health and care infrastructure, including a new health centre as an infrastructure requirement.	We propose to amend the allocated uses to include reference to community uses.	Change proposed.
TfL welcome the requirement to rationalise car parking on site. This should also clearly state the overarching aim is to be eventually car free and so as existing permits expire or existing residents move out. This could be accompanied by a Parking Design and Management Plan.	Support welcomed. We propose to add a reference in the policy to rationalising parking on-site in line with Policy T5 (Parking and car free development).	Change proposed.
Policy makes no reference to seeking to retain the established mature trees on site and a new criterion should be included	Comment noted. We propose to update the policy accordingly to reflect this.	Change proposed.
Welcome that the policy recognises the need to improve and regenerate the area in accordance with the Community Vision. This document supports provision of appropriate health and care infrastructure.	Support welcomed.	No change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.

The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.
The commonplace respondent set out detailed comments relating to how the latest plans presented to the community failed to consider the points set out in the master planning work.	Comments noted. They do not specifically relate to the draft Local Plan policy.	No change.

Policy C14 Wendling Estate and St Stephens Close

Summary of Comment	Council's Response	Proposed Changes to the Plan
Policy makes no reference to the specifics of the community vision for a healthier, greener, more sustainable and more accessible neighbourhood.	The policy refers to delivering regeneration benefits for the wider community that help to address the local priorities set out within the Gospel Oak and Haverstock Community Vision	No change proposed.
An additional criterion should be added to maximise the retention of existing trees and integrate them into the estate design as there are many mature trees on the site.	We propose to add reference to retaining existing trees where possible	Change proposed.
TfL request that there should be a requirement to rationalise car parking on site. This should also clearly state the overarching aim is to be eventually car free and so as existing permits expire or existing residents move out. This could be accompanied by a Parking Design and Management Plan.	We propose to add a reference in the policy to rationalising parking on-site in line with Policy T5 (Parking and car free development).	Change proposed.
The Building Heights Study reference should include reference to the adjacent conservation areas.	The adjacent conservation areas are already mentioned in the allocation and additional reference in the text relating to the Building	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
	Heights Study is not considered necessary.	
Welcome that the infrastructure requirements suggest a health facility may be needed. Early engagement with the developers will therefore be required.	Support welcomed.	No change proposed.
Thames Water envisage given the scale of development upgrades to the water supply network are likely to be required. But raise no concerns regarding wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy C15 Shirley House

Summary of Comment	Council's Response	Proposed Changes to the Plan
Object to the indicative use of the site for offices, residential and retail as these cannot all be delivered on this small site.	We proposed to amend the allocated use to student accommodation as it is considered an appropriate site for this use.	Change proposed.
The protection of office floor space and the desire to retain the existing building, combined with the massing required to deliver a viable office and meet the residential uplift requirements on site are not compatible as the site is not large enough. This tension should be recognised.	We proposed to amend the allocated use to student accommodation. Information has been provided to substantiate that the retention of the office use in the existing building presents an issue and that the retention of the building, in accordance with Policy CC2, is the preferred approach for this site.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Pre application work has indicated that an office-led refurbishment of the sites is challenging given poor ceiling heights, location of core and structural limitations. The existing building is unable to meet the essential requirements associate with EPC, layouts, floor to ceiling. The only way to deliver a viable office is to demolish the existing building but this cannot include residential uses.	We propose to amend the allocated use to prioritise the retention of the existing building as the preferred approach and therefore update the allocated uses on this basis, based on information provided.	Change proposed.
Retention and adaptation of the building lends itself to alternative uses, residential, co living, student uses and hotel.	Comment noted. We propose to amend the allocated use to student accommodation as the preferred approach for this site, to secure the retention of the existing building.	Change proposed.
Whilst not in the designated town centre it is immediately adjacent and so should allow alternative town centre uses such as a hotel.	This site is not considered appropriate for a hotel due to its location outside of the town centre.	No change proposed.
Unclear how the residential capacity has been calculated.	A site capacity study has been undertaken, taking into consideration the Plan's priority for the reuse of existing buildings. Further detail on the approach taken will be set out in a topic paper. We propose to amend the indicative capacity to reflect the change in the allocated use.	Change proposed.
Policy wording should set out that the retention of the existing building and carbon is an important consideration that can be considered as a material benefit against other elements of the Development Plan.	Retention of the existing building would be consistent with Policy CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings. It is not considered necessary to amend the policy wording.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support the requirement to enhance the Canal's biodiversity.	Support welcomed.	No change proposed.
Support the retention of this large, tall building, with improved amenity.	Support welcomed.	No change proposed.
Agree that the viewing platform should be removed and the requirement should be firmer.	The removal of the viewing platform would need to be considered against relevant Plan policies as part of a detailed planning application. We therefore propose to remove reference to its removal in the policy.	Change proposed.
Policy should also recognise the potential negative impact of overshadowing the Canal	The policy seeks the ensure that the design relates positively to the Canal and any overshadowing impact would be assessed against Policy A1 (Amenity).	No change proposed.
Reference could be included that this location may be appropriate for moorings	We propose to add a reference to moorings in the policy.	Change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy C16 Camden Town Station over-station development

Summary of Comment	Council's Response	Proposed Changes to the Plan
Site boundary should be amended to include the Buck Street Market (acquired by TfL) the ventilation shaft and Buck Street. This would allow a comprehensive form of development and layout of over station development and play a key role in the regenerating the public realm.	We propose to update the policy and site boundary to include Buck Street Market and the ventilation shaft	Change proposed.
Over station enabling development is a key element to delivering this station upgrade, (which is of key strategic importance to TfL) not only to part fund the cost of the project, optimise development but also to secure efficiencies in the construction and delivery of the station improvements.	Comment noted.	No change proposed.
Full use of available and future funding source such as CIL, S106 contributions in the nearby area should be sought	Comment noted.	No change proposed.
The policy should acknowledge the transport need for the development, which has been proven.	Comment noted. We have proposed amendments to Policy C1 to acknowledge the need for both step free access and capacity improvements.	Change proposed.
Place for London welcome the policy and the clear expectation for comprehensive redevelopment,	Support welcomed	No change proposed.
The upgrade is a project of strategic importance to TfL, to provide step free access address overcrowding and address circulation issues. The upgrade is essential for the future Northern line upgrade so of strategic importance to London also.	Comment noted.	No change proposed.
Allocated uses		
The over station development should be commercial led and	<u>The policy seeks a mixed use development,</u>	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
would suit office floorspace. Could attract a major office tenant and a range of digital, creative SME occupiers and a range of flexible workspaces. This would help deliver key objectives of Policy C1.	that includes residential and has been updated to include student accommodation, together with employment uses, including maker spaces, creative industries and offices. Meeting our housing targets is a key requirement of the Local Plan and this site could make a significant contribution to this.	
A permanent market use on the site is not considered appropriate as it could impact delivery of the station upgrade.	Comment noted. The allocated uses do not include market uses. The market use provision at Buck Street is a temporary use in planning terms.	Change proposed.
A wider range of uses should be included in the policy including hotel, student accommodation and residential use given the sites location within a designated town centre and high PTAL area	Permanent self-contained homes remain a key objective for the site, subject to demonstrating suitable amenity. However, we propose to amend the allocated uses to include student accommodation.	Change proposed.
A residential led development is not considered an appropriate use for the site or would it optimise its potential, given its location in the heart of Camden Town centre as a tourist destination and retail and entertainment hub.	Self-contained residential use is the priority use of the Local Plan and it is appropriate to seek to optimise this as part of mixed use development.	No change proposed.
The introduction of sensitive residential uses in this location could harm the continued operation of nearby uses such as Buck Street Market and the Electric Ballroom. Significant mitigation measures would be required and may be insufficient notwithstanding the agent of change principle.	The policy recognises the need to ensure there is no harm to the continued operation of the Electric Ballroom. The market site is now within the development and the temporary market use is not expected to be re provided.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support that commercial, retail and food and drink uses at ground floor would contribute to the vitality and viability of the town centre, but should be widened to flexible E class (a-f) to take account of changing market behaviour	Support welcomed.	No change proposed.
Site is suitable for hotel and visitor accommodation and Draft Local Plan policy IE5 seeks to steer these uses to CAZ and town centre locations and is highly accessible.	Self-contained residential use is the priority use of the Plan. The allocation therefore sets out our preferred approach for this site to help meet our housing targets, which a hotel use would not.	No change proposed.
Site is suitable for student accommodation in accordance with Draft Local Plan Policy H9. The site is highly accessible and within easy reach of higher education institutions and universities. Student accommodation here would help ease pressure on wider private rental properties.	We propose to amend the allocated uses to include student accommodation.	Change proposed.
It is unclear as to whether all the indicative uses are expected to be provided on site or whether these are just considered suitable. If all are expected, residential uses should be removed	The policies set out the Council's preferred approach to the development of the allocated sites to ensure that they deliver the objectives of this Local Plan and meet the needs of the local community. Self-contained residential is the priority use for the Plan and key development sites and so would be expected on this site.	No change proposed.
This site is adjacent to site allocation C20 – Grand Union House. This site C16 would be most suitable for offices above the station and C20 could be suitable for hotel / student uses.	Comment noted. The sites are in different ownership. Also site, C20 has been granted planning permission for alternative uses.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support the allocation, any housing should be subject to suitable noise mitigation measures due to the location above the station and adjacent uses.	We propose to amend the policy to include a criteria to ensure residential accommodation is designed to take account of the station entrance and pedestrian activity. Any application would be considered against Policy A1 (Protecting Amenity) and Policy A4 - Noise and Vibration.	Change proposed.
Indicative capacity		
Policy H2 requirement for 50% net additional non-residential floorspace is not applied to development that are publicly funded including transport infrastructure. This should be made clear in the policy.	Comment noted. This would be considered at the planning application stage, and it is not considered necessary not include in the policy.	No change proposed.
The indicative capacity of 60 homes is considered challenging given the constraints of the site.	Given the increased site area, we propose to amend the indicative capacity to 110 homes, based on site capacity assessment work.	Change proposed.
Development and Design Principles		
Policy should make clear that demolition of all buildings will be required to deliver the new station due to the complexity of the project and constrained work site.	The policy recognises that demolition may not require planning permission if a Transport and Works Act Order is made. However, if permission is required, demolition is unlikely to be acceptable without the station improvements coming forward on the site.	No change proposed.
The station entrance location is still subject to design and testing and could be changed from Buck Street to Camden High Street. It would still be predicated on providing a public space and	We propose to update the policy to ensure flexibility for the location of the entrance whilst ensuring that it is	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
public realm improvements. The allocation should allow flexibility to ensure the most efficient and viable position can be agreed as part of the wider development potential	designed in coordination with a new civic space.	
The site is not identified as a location where a tall building may be appropriate and is in an area that defines a tall building as being over 30 metres. This fails to recognise or optimise the development opportunity presented by an over station development and would make delivery harder to achieve. The site offers the opportunity for a well-designed landmark building, rising above the prevailing context, helping with way finding and improving legibility. Higher massing could be achieved away from key views within the conservation area. The policy should recognise the potential for a building over 30 metres	The policy reflects the Camden Building Heights Study did not identify the site as having potential for a tall building. Any application for a tall building on this site would be assessed against the Local Plan Policy D2 – Tall Buildings and all other relevant policies.	
The Tall Building study recognises the potential for a distinctive larger building as part of a comprehensive over station development. This study should be amended to include the site as an appropriate location for a tall building and set an appropriate height range but not a maximum.	The Building Heights Study is an evidence document that was published in 2024. It is not possible to amend its contents at this stage.	No change proposed.
Infrastructure requirements		
TfL acknowledge that development of this site alone is unlikely to deliver the station upgrade and so should be designed so as not to preclude the full station as and when funding is available and should provide a financial contribution towards delivery of the station capacity upgrade.	Comment noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Add a new criteria given the area's deficiency in tree cover, to maximise the potential for urban greening, including new tree planting	We propose to update the policy refer to greening measures including tree planting.	Change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comments noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy C17 UCL Campus, 109 Camden Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
The indicative capacity is significantly below the capacity that could be accommodated on site through a redevelopment proposal.	The indicative capacity on this site is based on the retention and extension of existing buildings. Where substantial demolition is proposed this will need to be justified in accordance with Policy CC2 (Retention of Existing Buildings)	No change proposed.
Support the requirement to retain trees and increased urban greening.	Support welcomed.	No change proposed.
Support the requirements to retain green spaces and sports facilities.	Support noted. We propose to remove reference to sports facilities as they are outside of the site area.	Change proposed.
Student accommodation has specific health requirements and should comply with policy H9.	Comment noted. Any application would be considered against all relevant Local Plan policies.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Thames Water envisage given the scale of development upgrades to the water supply network are likely to be required. But raise no concerns regarding wastewater networks.	Comment noted. We propose to update the policy to reflect this.	Change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy C18 Arlington Road former depot site

Summary of Comment	Council's Response	Proposed Changes to the Plan
The proposed uses should be amended to include student accommodation given the forecasted demands for student housing in the borough and the potential impact of providing purpose built student accommodation on helping limit wider pressures on the wider rental market	We propose to amend the allocated uses to include student accommodation.	Change proposed.
The indicative residential capacity should be revised to say 66 as a minimum, allowing for flexibility and a design-led approach.	We propose to amend the capacity to 63 to reflect site capacity work undertaken. It remains an indicative figure.	Change proposed.
Remove the reference to 'existing' and just refer to future employment uses when ensuring the operation of employment uses are not compromised by the introduction of housing	We propose to amend the policy to remove reference to existing employment use as the site is vacant.	Change proposed.
Remove reference to the public house being locally listed	This is relevant contextual information.	No change proposed.
Include reference to optimising the opportunities for the site to provide affordable housing and other	We propose to amend the allocated uses and criteria to include student accommodation,	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
types of self-contained and student accommodation	affordable housing would be sought as appropriate in accordance with Policy H4 (Maximising Affordable Housing).	
The site could be suitable for a tall building over 30 meters, subject to design heritage and townscape testing. This should be recognised in the criteria	The allocation reflects the findings of the Camden Building Height Study which did not identify the site as a location where tall buildings may be an appropriate form of development. Any application for a tall building would be assessed against Policy D2 (Tall Buildings)	No change proposed.
Should include a new criteria relating to maximising the potential for urban greening including new tree planting given the areas deficiency in tree cover	We propose to amend the policy to refer to tree planting	Change proposed.
Thames Water do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed.
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comment noted. This is covered by Local Plan Policy NE4 – Water Quality, and would be taken into account at the planning application stage.	No change proposed.

Policy C19 Highgate Centre

No representations were received on Policy C19.

Policy C20 Grand Union House, 18-20 Kentish Town Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
Site has a resolution to grant planning permission for increase in office, flexible class E use and	Noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
residential use. It would bring an active frontage to Kentish Town Road on a key site in the town centre, connecting Kentish Town Road, to Camden Town station and Regents Canal.		
Site Policy needs to be more flexible to ensure it does not hinder appropriate and viable uses coming forward	The proposed uses reflect the approved planning permission.	No change proposed.
Site uses should be widened to include wider uses including a hotel, student accommodation and employment uses (light industrial / warehousing)	The allocated uses set out the Council's preferred uses for this site.	No change proposed.
A hotel use is appropriate as the site is within the town centre and a highly accessible location in accordance with Local Plan policy IE5. It would create job opportunities and provide natural surveillance and a 24 hour economy	Self-contained residential use is the priority use of the Local Plan to help meet the housing targets. The site is not considered appropriate for a hotel use Policy H1 (Maximising Housing Supply) seeks to resist the alternative development of sites identified for housing through a current planning permission, unless it can be demonstrated to the Councils satisfaction that the site is no longer developable for housing.	No change proposed.
Site is suitable for student accommodation as highly accessible and could help meet the identified student need in Local Plan Policy H9.	This site has a permission for self-contained residential use, which is the priority use of the Local Plan. Other site allocations include student accommodation to help meet need.	No change proposed.
Site is suitable for light industrial or warehousing as has a lawful commercial use, potentially self-storage. It has purpose built on site servicing / loading bays. It	The Allocated uses for this site include employment uses.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
could support local start-up businesses.		

Policy C21 Heybridge Garages

No representations were received on this site allocation.

Policy C22 Former flats 121 – 129 Bacton, Haverstock Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
The Building Height Study reference should include reference to the adjacent conservation areas.	The Building Heights Study is an evidence document, which has already been published. The potential impact on the conservation area would be taken into account at the planning application stage, when considered against Local Plan Policy D5 – Heritage. Additional text is not considered necessary in the policy	No change proposed.
The building height should be restricted to 8 storeys only as this has been subject to extensive consultation.	The site allocation reflects the findings of the Camden Building Heights Study, which sets out a potential range, based on an assessment of relevant criteria.	No change proposed.

Policy C23 Former Charlie Ratchford

No representations were received on this site allocation.

Policy C24 52 Avenue Road

No representations were received on this site allocation.

Policy C25 5 – 17 Haverstock Hill

No representations were received on this site allocation.

Chapter 5 – West Camden

In total **135** representations were made on the West Camden chapter. Of these, **9** representations were received via commonplace and **126** representations were received via email.

Representations on this policy were received from the following consultees:

- Essential Living
- Stadium Capital Holdings
- Lifecare Residential ltd
- Gondar and Agamemnon Residents' Association (GARA)
- Woodland Trust
- Campaign to Protect Rural England (CPRE)
- Thames Water
- Environment Agency
- Thames Water
- Narrowpack
- LS Finchley Road Ltd
- Hampstead Asset Management Ltd
- Transport for London (TfL)
- NHS Healthy Urban Development Unit (HUDU)
- Members of the public

General comments

Summary of Comment	Council's Response	Proposed Changes to the Plan
The High Street needs to be improved, to address problems of too many vehicles, narrow pavements, parking on pavements and poor cycle parking provision.	Comments noted. Policy W1 states that improvements to the street environment and public realm around the three West Hampstead stations and along West End Lane, Blackburn Road and Finchley Road, is a key priority for the Council.	No change proposed
Camden should work with TfL to address the overcrowding issues at West Hampstead tube station by increasing trains and platforms to manage the increased	The delivery of a new link / step free access into West Hampstead and/or Finchley Road Underground stations is designed to help address capacity issues at these stations. We are not	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
population rise from the O2 development. Camden should work with TfL to bring the Metropolitan line to West Hampstead and increase trains and platforms to manage the significant increase in population expected in West Hampstead.	aware of any plans to bring the Metropolitan Line to West Hampstead.	
No residential or private parking should be allowed as part of the redevelopment and the roads should be improved.	Policy T5 of the Local Plan seeks to ensure that new development is car free to reduce car ownership and vehicle use.	No change proposed
Should invest in the area for existing residents before increasing the residents.	Comments noted. Policy W1 sets out the key infrastructure priorities for the area, required to support the delivery of development and provide the services and facilities needed for the areas communities.	No change proposed
There are too many new residential blocks being built, changing the character of the area and insufficient amenities being provided. The area needs more shops, restaurants to support a vibrant community.	Comments noted. Policy W1 sets out the Council's overarching strategy for the area and includes a number of key infrastructure priorities to support the delivery of development and provide the services and facilities needed for the areas communities.	No change proposed
The busy nature of the Kilburn High Road (A5) makes it difficult for people to access both sides on the street. New development should not add to traffic on both	Comments noted. Policy T5 of the Local Plan seeks to ensure that new development is car free to reduce car ownership and vehicle use.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Kilburn and Finchley Road. Prioritise local people on Kilburn High Road.		
Camden must work with Thames water to ensure the Victorian sewage pipes are replaced to prevent repeated flooding of properties on Belsize Road and to reduce leaks on West End Lane.	Comments noted. We have consulted Thames Water as part of the preparation of the Local Plan.	No change proposed
The existing community centres in the area should be supported, particularly as the population of the area grows.	Comments noted. Policy SC2 seeks protect existing community centres in Camden.	No change proposed
There needs to be a significant reduction in car traffic for the whole area and particularly West End Lane. Ways to deliver this could include bus gates and other filters. Or making the one way slip road at West End Green into a public space with SUDS. Removing through traffic from the Iverson Road / West End Lane junction should be considered.	Comments noted. Policy W1 states that improvements to the street environment and public realm around the three West Hampstead stations and along West End Lane, Blackburn Road and Finchley Road, is a key priority for the Council.	No change proposed
Options should be considered such a bus gates and filters to significantly reduce traffic on West End Lane.	Comments noted.	No change proposed
Could convert the one way slip road at Wet End Green into public open space to provide more greening and sustainable drainage.	Comments noted.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Should investigate removing through traffic from the Iverson Road and West End Lane junction.	Comments noted.	No change proposed
Welcome the prioritisation of public realm improvements in, around and between West End Lane and Finchley Road.	Support welcomed.	No change proposed
The pedestrian subway outside Finchley Road station and pavements around the station should be included as part of the public realm improvements as it could assist with improving access and reducing congestion that will arise from the additional footfall.	Policy W1 Infrastructure section refers to improvements to the street environments around the stations and Finchley Road.	No change proposed
Investigate options to improve the West End Lane and Broadhurst Gardens intersections to prioritise pedestrians. Could all traffic lights be replaced with zebra crossings in front of the stations.	Policy W1 states that the creation of attractive and safer walking, wheeling and cycling routes both into and through the area is a key priority for the Council.	No change proposed
Consider including Granny Dripping Steps as an additional entry/exit to the tube station to alleviate existing bottlenecks.	Policy W2 for the O2 Centre, car park, car showrooms and 14 Blackburn Road seeks to secure physical improvements to Billy Fury Way and Granny Dripping steps to improve access into the site.	No change proposed
Use this opportunity to prioritise cycling on West End Lane to Finchley	Policy W1 states that the creation of attractive and safer walking, wheeling	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Road and to the wider area through to Camden Town and Maida Vale.	and cycling routes both into and through the area is a key priority for the Council.	
Seek to improve the public Square by the Overground Station with more benches, planters another public realm improvements.	Policy W1 states that improvements to the street environment and public realm around the three West Hampstead stations is a key priority for the Council.	No change proposed
The area is already hugely overcrowded and there is no capacity for more housing, without destroying the character of the area and a deterioration of services and amenities.	Comments noted.	No change proposed
Investigate options to improve the West End Lane and Broadhurst Gardens intersections to prioritise pedestrians. Could all traffic lights be replaced with zebra crossings in front of the stations.	Policy W1 states that the creation of attractive and safer walking, wheeling and cycling routes both into and through the area is a key priority for the Council.	No change proposed
Consider including Granny Dripping Steps as an additional entry/exit to the tube station to alleviate existing bottlenecks.	Policy W2 for the O2 Centre, car park, car showrooms and 14 Blackburn Road seeks to secure physical improvements to Billy Fury Way and Granny Dripping steps to improve access into the site.	No change proposed
Use this opportunity to prioritise cycling on West End Lane to Finchley Road and to the wider area through to Camden Town and Maida Vale.	Policy W1 states that the creation of attractive and safer walking, wheeling and cycling routes both into and through the area is a key priority for the Council.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Seek to improve the public Square by the Overground Station with more benches, planters another public realm improvements.	Policy W1 states that improvements to the street environment and public realm around the three West Hampstead stations is a key priority for the Council.	No change proposed
The area is already hugely overcrowded and there is no capacity for more housing, without destroying the character of the area and a deterioration of services and amenities.	Comments noted.	No change proposed

Policy W1 – West Camden

Summary of Comment	Council's Response	Proposed Changes to the Plan
There should be a separate section on the Environment & Biodiversity, given the positive effects of biodiverse open space on mental health.	The need for open space and biodiversity enhancements in the West of the borough is recognised under part L of the policy.	No change proposed
We support the infrastructure requirements noted, particularly delivery of flood mitigation measures, greening and biodiversity and enhanced public open spaces.	Support welcomed.	No change proposed
Support criteria L vii) and ix).	Support welcomed.	No change proposed
Recommend that the Ancient Tree Inventory for the area is updated and that suitable root protection areas are designated.	Policy NE3 (Tree Protection and Planting) states that the Council will resist the loss of a tree, group of trees, area of woodland and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. The	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
	policy goes on to state that the Council will also resist proposals which may threaten the continued wellbeing of such trees as specified above.	
Evidence produced by the Woodland Trust shows a need for greater tree planting around Iverson Road (sites W2-W5). Policies for these sites should seek to maximise the potential for new tree planting.	Policy NE3 (Tree Protection and Planting) states that the Council will require developments to incorporate additional trees and vegetation wherever possible, as part of a detailed landscaping scheme for the site. This policy will be applied to development schemes coming forward in Camden where applicable. The policies for site allocations W2 and W5 also state that development must deliver biodiversity enhancements in line with Policy NE2 (Biodiversity).	No change proposed
Policy should be updated to reference that a new link and step-free access into West Hampstead and/or Finchley Road Underground stations would also improve capacity at those stations.	We propose to update the Policy to reference that a new link and step-free access into West Hampstead and/or Finchley Road Underground stations will also improve capacity at those stations.	Change proposed
Please include a map in the Plan showing proposed walking and cycling routes for this area.	It is not considered necessary to include a map of proposed walking and cycle routes in the Plan, as this information is contained in other plans	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
	and strategies that the local plan signposts to.	
Consideration should be given to improving the interchange experience in this area, including with buses, and resulting pedestrian desire lines between the stations.	We propose to update the policy to refer to the need to improve the interchange experience in this area, including with buses, and resulting pedestrian desire lines between the stations.	Change proposed
There is a shortage of healthcare accommodation in the West of the Borough, and the ICB is keen to work with the Council to explore all the possible opportunities to secure additional capacity to meet current and future need.	Comment noted.	No change proposed
Support for the identification of the O2 centre as a significant redevelopment opportunity.	Support welcomed.	No change proposed
Support criteria L vii) and ix).	Support welcomed.	No change proposed
Recommend that the Ancient Tree Inventory for the area is updated and that suitable root protection areas are designated.	Policy NE3 (Tree Protection and Planting) states that the Council will resist the loss of a tree, group of trees, area of woodland and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. The policy goes on to state that the Council will also resist proposals which may threaten the continued wellbeing of such trees as specified above. An update to the Ancient Tree Inventory is not a matter for the Local	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
	Plan. We have therefore passed your comment on to the relevant service in the Council.	
Evidence produced by the Woodland Trust shows a need for greater tree planting around Iverson Road (sites W2-W5). Policies for these sites should seek to maximise the potential for new tree planting.	Policy NE3 (Tree Protection and Planting) states that the Council will require developments to incorporate additional trees and vegetation wherever possible, as part of a detailed landscaping scheme for the site. This policy will be applied to development schemes coming forward in Camden where applicable. The policies for site allocations W2 and W5 also state that development must deliver biodiversity enhancements in line with Policy NE2 biodiversity.	No change proposed
Policy should be updated to reference that a new link and step-free access into West Hampstead and/or Finchley Road Underground stations would also improve capacity at those stations.	We propose to update the Policy to reference that a new link and step-free access into West Hampstead and/or Finchley Road Underground stations will also improve capacity at those stations.	Change proposed
Support Part C of W1. However suggest it is amended to read - "The greatest concentration of development in the West of Camden will be the area between West End Lane in West	We propose to update Policy W1 to refer to 14 Blackburn Rd.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the Plan
Hampstead and the Finchley Road, which is currently occupied by the O2 centre, other retail uses and associated car parking, and 14 Blackburn Road".		
Part (d) of draft Policy W1 should read: "The site referred to in part (c) above.	We propose to update Policy W1 to refer to 14 Blackburn Rd.	Change proposed
Parts (j), (l)(iv) and l(v) of draft Policy W1 should be updated to refer to 14 Blackburn Rd.	We propose to update Policy W1 to refer to 14 Blackburn Rd.	Change proposed
Reference should be made to directing Community Infrastructure Levy (CIL) receipts, towards some of the identified infrastructure priorities for the area. Policy should be updated to state "The Council will work with relevant providers and direct CIL receipts from local developments to secure the infrastructure needed to support development and provide the facilities needed for the area's communities".	Policy DM1 Delivery and Monitoring sets out how the Council will use CIL and planning obligations to secure the infrastructure, facilities and services to meet the needs generated by development. It is important that the plan is read as a whole.	No change proposed
Update part (l)(i) to read: i. Facilitation and contributions towards the delivery of a new link / step free access into West Hampstead and/or Finchley Road underground station ii. Facilitation and contributions towards the	The policy wording reflects TfL's priorities for this area.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
delivery of a new link / step free access into Finchley Road underground station		
Update the list of the key priorities for the area, as follows "Delivery of a strong, convenient, direct, safe and accessible pedestrian and cycling east-west route linking Finchley Road with West End Lane and providing safe and attractive linkages to the surrounding communities".	This is covered by criteria ii of Part L of Policy W1. It's also covered by Policy W2.	No change proposed
Support Part C of W1. However suggest it is amended to read - "The greatest concentration of development in the West of Camden will be the area between West End Lane in West Hampstead and the Finchley Road, which is currently occupied by the O2 centre, other retail uses and associated car parking, and 14 Blackburn Road".	We propose to update Policy W1 to refer to 14 Blackburn Rd.	Change proposed
Part (d) of draft Policy W1 should read: "The site referred to in part (c) above.	We propose to update Policy W1 to refer to 14 Blackburn Rd.	Change proposed
Parts (j), (l)(iv) and l(v) of draft Policy W1 should be updated to refer to 14 Blackburn Rd.	We propose to update Policy W1 to refer to 14 Blackburn Rd.	Change proposed
Reference should be made to directing Community Infrastructure Levy (CIL) receipts, towards some of the identified infrastructure priorities for the area.	Policy DM1 Delivery and Monitoring sets out how the Council will use CIL and planning obligations to secure the infrastructure, facilities and services to meet the	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Policy should be updated to state "The Council will work with relevant providers and direct CIL receipts from local developments to secure the infrastructure needed to support development and provide the facilities needed for the area's communities".	needs generated by development. It is important that the plan is read as a whole.	

Policy W2 - O2 Centre, car park, showroom sites and 14 Blackburn Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
Comments on the background section		
The background information should recognise that the redevelopment of this area in a one off and unique opportunity.	The suggested wording is not considered necessary.	No change proposed
Information regarding the status of the planning permission should be updated.	We propose to amend the policy to reflect the updated position.	Change proposed
Reference should be made to the extant planning permission on 14 Blackburn Road.	We propose to amend the policy to reflect the latest situation on this element of the site.	Change proposed
The policy should be strengthened to reflect that comprehensive development is required in order to deliver the range of benefits that the permitted scheme requires.	We propose to amend the policy to reflect this.	Change proposed
The policy should recognise that independent delivery of sites that adopt a	We propose to amend the policy to clarify the expectations regarding	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
collaborative and coordinated approach can achieve an integrated and comprehensive development across the site and could serve to accelerate delivery of development.	delivery across the whole site.	
The planning permission for the Masterplan of the site clearly identifies that the sites are 'severable' in the permission and S106. This supports the case that the allocation should be more flexible.14 Blackburn Road could be developed separately and the adopted SPD recognises other sites may come forward separately.	We propose to amend the policy to clarify the expectations regarding delivery across the whole site.	Change proposed
Caselaw is provided to demonstrate where the courts have considered piecemeal versus comprehensive approach. There are clear parallels here where a SPD had been adopted as well as a phased and severable master planned planning permission granted. Accordingly, it would not be a piecemeal approach for a separate planning permission to come forward within the masterplan area and in accordance with its parameters, nor would it be a piecemeal approach for such a permission to be developed by a developer other than the	We propose to amend the policy to remove reference to piecemeal development, and set out that schemes should not prejudice future development and design quality across the whole site.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
owner of the remaining master planned area		
Concerned that the development will not go ahead in its entirety due to developer not owning the part of the site where community facilities will be delivered. Phase 1 homes will be delivered without the improved facilities of the tube, equivalent sized grocery store and doctor facility. Resulting in further overcrowding of the area.	The planning approval covers the entire site and the associated legal agreement seeks to ensure the timely delivery of infrastructure requirements.	No change proposed
Comments on allocated uses		
Local Plan policy E2 seeks to protect premises or sites suitable for continued business use and supports redevelopment at higher intensities provided that redevelopment retains existing businesses on the site. 14 Blackburn Road is a successful builders merchants and would like to continue on site. Independent redevelopment would allow this. Neither the allocation, nor the O2 masterplan, propose or provide commitments to re-provide floorspace for BDL, contrary to Camden's employment policies.	The allocated uses in the policy reflect the planning permission granted for the site.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Allocated uses are considered to conflict with the broader aims and objectives of national, regional and local planning policy guidance as they do not allow for provision of student housing.	The allocated uses are not considered to conflict with the broader aims and objectives of national, regional and local planning policy, and reflect the planning permission granted for the site.	No change proposed
Student housing should be included in the allocated uses as well as self-contained. It is in line with the principle of 'residential led' and would be in accordance with the housing policies of the plan, help meet housing delivery targets and contribute towards creating mixed, inclusive and sustainable communities.	The allocated uses for this site prioritise the delivery of self-contained homes and employment uses to meet identified needs and housing delivery targets, consistent with the planning permission granted for the site. The Local Plan identifies a need for student housing and identifies sites where we consider this use may be appropriate.	No change proposed
Comments on design principles		
Reference should be included to being 'in accordance' with the West End to Finchley Road SPD.	We propose to amend the policy to refer to the SPD.	Change proposed
Separate proposals, designed by different architects, can contribute to better place-making subject to ensuring these are harmonious with each other which can be achieved through collaboration. There are numerous examples of successful masterplans that have been delivered with	Noted. The policy does not prevent this. It seeks excellent design and architecture in accordance with Local Plan Policy D1 (Achieving Design Excellence)	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
multiple architects and developers in Camden		
Reference to including a significant proportion of homes for families should be removed, as the mix of types, sizes and tenures will provide this type of housing.	The priority for family homes, particularly in the affordable element, is a key element of the Local Plan housing policies, and it is appropriate to seek provision of homes for families on this site.	No change proposed
Reference should be changed to 'should explore' rather than requiring them to explore the provision for older people.	It is considered appropriate to require exploration of opportunities to deliver provision for older people, given the scale of site and housing provision on the site.	No change proposed
Policy should make reference to reprovide the existing Building Depot use on site in accordance with the Local Plan policies.	The policy seeks a mixed use development including employment uses, reflecting the planning permission for the site.	No change proposed
Accept the reference to requiring affordable work space subject to policy IE4, provided this is amended to reduce the 20% requirement.	Specific reference to the affordable workspace has been removed for this policy. We propose to amend policy IE4 to add reference to the 20% floorspace target being a "working benchmark".	Change proposed
The gym, cinema and key retailers lost in the O2 development should be re-provided with similar services and ensure the GP and Dentist practices are opened.	The policy requires a new cinema, retail uses and the provision of a new NHS health centre.	No change proposed
Concerned that the development will not go ahead in its entirety due to developer not owning the part of the site where community facilities will be delivered.	The planning approval covers the entire site and the associated legal agreement seeks to ensure the timely delivery of infrastructure requirements.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Phase 1 homes will be delivered without the improved facilities of the tube, equivalent sized grocery store and doctor facility. Resulting in further overcrowding of the area.		
The Policy should refer to town centre uses also being focused within the West Hampstead Town Centre as well as Finchley Road / Swiss Cottage.	The site boundary does not include any of West Hampstead Town Centre.	No change proposed
The reference to a cinema should be amended to read in line with market requirements, to allow for a flexible approach.	The policy does not specify the type and size of cinema required. This would be determined at the detailed planning application stage.	No change proposed
The health facility should be referred to as being near the West Hampstead Interchange and in Phase 2 as this is well located for bus routes and maximising accessibility.	The planning permission specifies the phase of development the health centre will be provided.	No change proposed
Development and Design principles should include reference to east – west walking routes requirements.	These are included in the Infrastructure requirements section.	No change proposed
Support the identification of the site as suitable for a tall building, but feel that this section should only refer to the permitted heights not those in the study as it is potentially confusing.	It is considered appropriate to refer to both the heights in the Building Height Study and those granted in the planning permission. The heights approved in the planning permission reflected the design of the specific scheme and its impacts and benefits. The findings of the Building Height Study would be relevant to any subsequent proposals.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Do not agree that the development will provide more green spaces, they are just the gaps between tower blocks.	The policy requires a range of different open space forms and types to be provided.	No change proposed
Comments on infrastructure requirements		
Object to the allocation as the current infrastructure cannot cope and this large development will change the area for the worse.	The policy includes infrastructure requirements to address the impacts of the development.	No change proposed
There appears to be no consideration of essential facilities such as nursery, primary and secondary school and sports facilities to accommodate the children who will live here	The policy requires contributions to the provision of new and / or existing community facilities or services as required to meet the needs of increased residents. The Local Education Authority has confirmed that given current and predicted demand for school places in the borough, the proposal would not result in a requirement for additional school places or expansion over current provisions in the area.	No change proposed
The health centre is required and a payment in lieu should be secured in any subsequent planning application if not delivered.	The policy requires the provision of a NHS health centre and we propose to amend the allocated uses to refer to this.	Change proposed
Support the infrastructure requirements detailed.	Support welcomed.	No change proposed
The bus stop facilities requirement should also require incorporating bus	These matters would be addressed through a Bus Infrastructure Plan and	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
standing and driver facilities to TfL standards.	we propose to amend the policy to refer to this.	
Welcome the requirement to contribute towards bus priority and cycle infrastructure.	Support welcomed.	No change proposed
Integrate Granny Dripping Steps with West Hampstead Tube Stations	The policy seeks improvements to the Steps.	No change proposed
Integrate the subway under Finchley Road with Finchley Road Station to improve access and redistribute foot traffic and make the subway under Finchley Road safer.	The policy seeks improvements to Finchley Road including the provision of enhanced surface level crossing.	No change proposed
Support the enhancement of biodiversity corridors and urban greening.	Support welcomed.	No change proposed
Envisage given the scale of development upgrades to the water supply network are likely to be required. But raise no concerns regarding wastewater networks.	We propose to amend the policy to reflect these comments.	Change proposed
Identified relevant Environmental constraints • Bedrock Aquifer (unproductive) • Historic Landfill (Canfield Place)	Comments noted. This is covered by the Local Plan policy NE4 - Water quality and would be taken into account at the planning application stage.	No change proposed

Policy W3 - 11 Blackburn Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
Allocated uses should allow for a wholly commercial development to come forward on this site as it would be policy compliant and suitable for	The site is considered appropriate for a mixed use scheme, including self-contained housing - the priority use of the Local Plan - particularly	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
the wider area given the influx of residential development in the surrounding area. There is an identified need for additional commercial space in Camden and the identified growth area and a wholly commercial scheme would support economic growth and contribute to the demand for commercial floorspace.	given the previous planning permission for mixed use development. The allocated uses include employment uses.	
The site is not within an area that requires residential development to be provided as part of a mixed use scheme as it is not within a designated town centre or central London.	Local Plan policy encourages the inclusion of self-contained homes in all non-residential developments and the site is considered appropriate for mixed use development.	No change proposed
A mixed use scheme has potential for conflict between commercial and residential uses.	This would be considered at the planning application stage and proposals would be assessed against all relevant local plan policies, which seek to avoid or mitigate conflict between uses.	No change proposed
Concerned about the loss of the artist studio as there aren't many in the area and they are expensive.	The policy seeks to retain employment space accessible to small to medium businesses.	No change proposed
The previous consented residential use on the site has lapsed so there is no policy basis to require residential development to be protected or reprovided.	Self contained residential use is the priority use of plan. The previous permission on the site established it is considered appropriate for residential use.	No change proposed
Given the areas deficiency in tree cover an additional policy criteria	This would be considered as part of any planning application and against	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
suggesting maximising the potential for urban greening including new tree panting should be included.	the relevant Local Plan policies NE2 (Biodiversity) and NE3 (Tree Protection and Planting).	
Do not envisage infrastructure concerns regarding water supply or waste water networks.	Comment noted.	No change proposed
Identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comments noted. This is covered by the Local Plan policy NE4 - Water quality and would be taken into account at the planning application stage.	No change proposed

Policy W4 – 13 Blackburn Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
Given the areas deficiency in tree cover, an additional criteria for maximising the potential for urban greening and new tree planting should be included.	This would be considered as part of any planning application and against the relevant Local Plan policies NE2 (Biodiversity) and NE3 (Tree Protection and Planting).	No change proposed
Thames Water do not envisage infrastructure concerns regarding water supply or waste water networks.	Comment noted.	No change proposed
The Environment Agency identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comments noted. This is covered by the Local Plan policy NE4 - Water quality and would be taken into account at the planning application stage.	No change proposed

Policy W5 - 188 – 190 Iverson Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support the criteria requiring tree retention	Support welcomed.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
and increased urban greening.		
Request a buffer zone is included to protect the mature trees in Medley Road Orchard	The allocation includes criteria to ensure their area no direct or indirect impacts on the designated Medley Road Orchard open space and deliver biodiversity enhancements.	No change proposed
Envisage infrastructure concerns regarding water supply or waste water networks.	Comment noted.	No change proposed
Identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comments noted. This is covered by the Local Plan policy NE4 - Water quality and would be taken into account at the planning application stage.	No change proposed

Policy W6 - Land to rear of Meridian House, 202 Finchley Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
Building more houses on this site is a missed opportunity to enhance the area. The site is identified in the Redington Frognal Neighbourhood Plan for a redevelopment, with a setback building line to create a new green public realm area in an area lacking green space.	The allocation focusses on the land at the rear of Meridian House and does not envisage the redevelopment of that building. The site is not formally allocated in the Neighbourhood Plan and therefore the viability and deliverability of the redevelopment principles set out in the Plan were not tested.	No change proposed
Site is in an area which features much underground water and was formerly characterised by many natural ponds. A natural pond here would help to	This would be considered at a detailed planning application stage against relevant Local Plan policies.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
attenuate rainwater deliver a nature-based flood relief solution for problems further downstream		
The allocation should include community facilities as the area lacks these	The scale of proposed development would not justify the inclusion of community facilities. Any application for this type of use would be considered against relevant Local Plan policies.	No change proposed
Envisage infrastructure concerns regarding water supply or waste water networks.	Comment noted.	No change proposed
Identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comments noted. This is covered by the Local Plan policy NE4 - Water quality and would be taken into account at the planning application stage.	No change proposed

Policy W7 – Gondar Gardens

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support the policy for its contribution to meeting the housing needs in the area.	Support welcomed.	No change proposed
The allocated uses should include specialist forms of housing, such as the extra care accommodation that the Inspector recognised there was a need for in last appeal.	We propose to amend the allocated uses to include reference to a specialist care home.	Change proposed
Object to the indicative housing capacity being based on historic applications and should be based on a design-led approach.	It is considered appropriate for the capacity figure to take account of previous planning permissions on the site. The figure is indicative and the level of	No change proposed

	provision in any subsequent development proposal will be assessed against the allocation and all relevant Local Plan policies.	
Allocation should be amended to add a criteria to 'provide for a quantum of development and capacity which is of an appropriate scale and is focused on the undesignated area of the site in order to protect and enhance the designated open space, SINC and Local Green Space	The policy states that development must be focused on the un-designated area of the site, to protect the designated open space, SINC and Local Green Space. Development proposals will be assessed against the allocation and all relevant Local Plan policies.	No change proposed
Indicative capacity should be defined as a maximum number of habitable rooms rather than homes.	Setting out an indicative number of homes is considered an appropriate approach, and is consistent across all site allocations.	No change proposed
The size of homes should be defined more clearly in terms of size and tenure	The Plan's approach to size of homes is set out in policy H7 - Large and Small Homes.	No change proposed
Site should be removed from the allocations and retained as a whole as green space for the public to enjoy	The principle of the development of this site has been established through the granting of planning permission.	No change proposed
The area of the SINC has been identified incorrectly for the site on the existing Proposals map.	As part of the updated evidence base for the Local Plan, a review of Sites of Importance for Nature Conservation (SINC) has been undertaken. For Gondar Gardens, the review found that the boundary should be amended to include the south west corner. It is proposed that the Policies Map will be updated to reflect the findings of the review.	No change proposed

Support the policy recognising the importance of sustained management of the SINC in the future	Support welcomed.	No change proposed
Support the protection of the SINC and habitat enhancement criteria	Support welcomed.	No change proposed
The reference to protecting views across the site should be removed. There are no rights to a view unless specifically identified as a protected or locally important view. Any application would be required to be assessed in terms of its impact on the outlook and amenity of existing residential properties.	The views across the site have been considered important in previous planning decisions.	No change proposed
A buffer zone should be included along the southern boundary to protect the priority habitat from any development.	The boundary reflects the land ownership. The allocation includes criteria seeking to protect existing designations and habitats in accordance with Policy NE2 (Biodiversity).	No change proposed
Woodland should be included in the criteria relating to ecological mitigation measures	The allocation includes reference to existing habitats.	No change proposed
Development principles should state that development should 'only' be on rather than 'focused' on as this is too open to interpretation.	'Focused on' is considered to be clear.	No change proposed
Envisage infrastructure concerns regarding water supply or waste water networks.	Comment noted.	No change proposed
Identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comments noted. This is covered by the Local Plan policy NE4 - Water quality and would be taken into account at the planning application stage.	No change proposed

Policy W8 – Land at Midland Crescent

Summary of Comment	Council's Response	Proposed Changes to the Plan
The policy is not considered to maximise the development potential of this site in accordance with NPPF, London Plan and Local Plan policies. It is considered restrictive and impedes the most efficient use of the site.	The allocation is considered appropriate and reflects the planning permission for the site.	No change proposed
Allocated uses should be broader to include all forms of housing and town centre uses not just permanent self contained homes.	The allocated uses allow for a mixed use development, self contained and student housing.	No change proposed
Site is considered to be suitable for a tall building on the Finchley Road frontage, particularly given the permission for the O2 site close by.	Any application for a tall building on this site would be considered against Policy D2 (Tall Buildings)	No change proposed
Indicative capacity should be amended to referring to applying a design led approach to achieve the optimum capacity for the site, whilst considering heritage, townscape and neighbour amenity.	The indicative capacity reflects the extant planning permission. A larger number of homes 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.	No change proposed
Should include public realm improvements like a small garden square in front of the development to improve the greenery of Finchley Road	Any public realm improvements would be considered at the detailed planning application stage.	No change proposed

Policy W9 – Petrol Station, 104A Finchley Road

No comments were received on this site allocation

Policy W10– Abbey Co- Op Housing site, Emminster and Hinstock

No comments were received on this site allocation

Policy W11- 100 Avenue Road

Summary of Comment	Council's Response	Proposed Changes to the Plan
Welcome the Policy, but feel it needs more details.	Support welcomed	No change proposed
The reference to the extant planning permission should be more clearly detailed.	Comment noted	Change proposed
Works are more than 'initial' with substantial below ground construction works at basement level	Comment noted	Change proposed
Policy should include more detail on the sites context and include terms and parameters similar to the adopted 2013 Site Allocation.	Given the site is under construction, further detail is not considered necessary	No change proposed
Site is an important gateway site and has significant potential to deliver substantial number of housing units.	Comment noted.	No change proposed
The capacity should not be based on the implemented permission, but rather the capacity and potential of the land itself. Capacity should not be a maximum figure and any future proposal would be assessed on its merits.	The capacity figure is indicative not a maximum figure. Any future application would be assessed on its merits and relevant Local Plan policies. However, given the planning permission on the site is extant, any future application must not result in any reduction of residential floor space.	No change proposed
The reference to building heights should reference the approved height on site and not just the Building Height Study range, as this is self limiting in the context of what is already approved and extant.	Comment noted. We propose to add reference to the height granted on appeal.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Allocated uses should acknowledge the requirement for a mixed use development including the creation of active ground floor commercial / leisure frontages	It is proposed that the allocated uses makes reference to ground floor town centre uses and community use.	Change proposed
Policy should recognise the role new development and well considered architecture can have in creating a focal point	The proposed wording is not considered necessary	No change proposed
Policy should note that highly accessible gateway sites have significant potential for higher density developments.	The proposed wording is not considered necessary.	No change proposed

Policy W12 – Former Liddell Road Industrial estate

No comments were received on this site allocation

Policy W13 – 551 – 557 Finchley Road

No comments were received on this site allocation

Policy W14 – 317 Finchley Road

No comments were received on this site allocation

Chapter 6 – North Camden

In total **50** representations were made on the North Camden chapter. Of these, **8** representations were received via commonplace and **42** representations were received via email.

Representations on this policy were received from the following consultees:

- Campaign to Protect Rural England (CPRE)
- Dartmouth Park Neighbourhood Forum (DPNF)
- Environment Agency
- Green Party
- Harrison Varma
- NHS Healthy Urban Development Unit (HUDU)
- Royal Free London NHS
- Sports England

- Thames Water
- Transport for London
- Woodland Trust
- Members of the public

General comments

Summary of Comment	Council's Response	Proposed Changes to the Plan
No comments to make on the description of the North of the borough so far as it relates to the Dartmouth Park Area it presents an accurate description.	Comment noted.	No change proposed
No objection to the identified sites, as none of the sites has a direct impact or is adjacent to the identified areas of Ancient Woodland on Hampstead Heath.	Comment noted.	No change proposed
Recommend that the Ancient Tree Inventory for the area is updated and that suitable root protection areas are designated.	Policy NE3 (Tree Protection and Planting) states that the Council will resist the loss of a tree, group of trees, area of woodland and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. The policy goes on to state that the Council will also resist proposals which may threaten the continued wellbeing of such trees as specified above. With regards to the need to update the Ancient Tree Inventory, this isn't a matter for the Local Plan and we have passed your comments on to the relevant service in the Council.	No change proposed

Policy N1 – North Camden

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support Policy N1 – especially parts F. iv and v (open space, greening and biodiversity and flood mitigation measures).	Support welcome.	No change proposed
Please improve the cycle network in Hampstead.	The Council's Transport Strategy and Cycling Action Plan set out the Council's priorities for the cycle network in Camden. Policies T1, T2 and T4 of the Local Plan also support the delivery of new cycle infrastructure. As this isn't a matter for the Local Plan we have passed your comments on to the relevant service in the Council.	No change proposed
Note that the policy states that an integrated care hub will be delivered in the North of the Borough. Internal alterations to the Roy Shaw centre are a current priority project for the NHS. This may require further funding and/or increased provision in existing premises.	Comment noted	No change proposed
A – F provide an adequate framework for planning policy within the Dartmouth Park Area	Comments noted.	No change proposed
Support policy criteria iv.	Support welcome.	No change proposed
Support the prioritization of area-based schemes to improve conditions for walking and cycling.	Support welcome.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
Criteria F i and ii should cross-reference the Camden Transport Strategy and Cycling Action Plan.	We propose to update the policy to cross reference to the Camden Transport Strategy and Cycling Action Plan.	Change proposed
It would be clearer to include a map of the proposed walking and cycling networks.	It is not considered necessary to include a map of proposed walking and cycle routes in the Plan, as this information is contained in other plans and strategies that are referred to in the plan.	No change proposed
Greater reference should be made to Highgate in this part of the Plan.	It is not considered necessary or appropriate to include the level of detail requested on particular areas with the borough. A number of references are made to Highgate and the Highgate neighbourhood plan in the supporting text to the policy. No change is considered necessary.	No change proposed
Should mention that Camden residents are also served by Archway (Islington) and Highgate (Haringey) underground stations.	We propose to update the Plan to refer to Archway (Islington) and Highgate (Haringey) underground stations.	Change proposed
Highgate also has a high concentration of schools with schools just over the border with Haringey with significant school run issues.	Comment noted.	No change proposed
This area has limited permeability, particularly in the east - west direction.	Comments noted. Healthy Streets are an initiative that is being taken forward by the Council's Transport	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
The demographic (many older residents) and topography of the area need to be taken into consideration too. Camden should respect the need for car use in the absence of any alternative means of transport. Therefore, any policies for Healthy Streets and increased cycling provision should ensure this will not result in displacement onto neighbouring streets, increased congestion and thus air pollution, loss of mobility for residents and loss of essential parking space.	Team. We have shared this comment with them.	

Policy N2 – Former Mansfield Bowling Club

Summary of Comment	Council's Response	Proposed Changes to the Plan
Site allocation should be removed and the space safeguarded as a green space or nature reserve.	Planning approval has been granted for development on part of this site. The allocation seeks to ensure any future application retains the public benefits including open space for the community and additional community benefits.	No change proposed
It is not necessary to allocate this site for C3 residential use as planning permission has already been granted for this use and lawfully implemented.	Planning approval has been granted for development on part of this site. However, the permission has not been built out. The allocation would inform any future application on the site. Permanent self contained	No change proposed

	housing is the priority use of the Local Plan,	
The indicative use should be amended to include a residential care home to help meet the housing needs identified in both London and Camden Plan policies and to help in meeting the overall housing requirements.	We propose to update the policy to include reference to a residential care home, subject to this meeting the needs of borough residents in accordance with Local Plan policy H8 (Housing for older people, homeless people and other people with care or support requirements).	Change proposed
Indicative uses do not refer to the developers current intention to develop a luxury 80 bed care home, which we strongly object to.	Any future application on the site will be assessed against the Site Allocation and Local Plan policies at the time of consideration.	No change proposed
Supports development which includes small homes to allow older residents to downsize from family housing to smaller units and to provide first homes for younger people. Allocating the site for residential care home accommodation would help free up local market housing as a result of occupants downsizing.	We propose to update the policy to include reference to a residential care home, subject to this meeting the needs of borough residents in accordance with Local Plan policy H8 (Housing for older people, homeless people and other people with care or support requirements).	Change proposed
The indicative capacity identified should be amended to include the residential care home capacity also.	It is not considered appropriate to specify a capacity for this use as it is very specific.	No change proposed
Support the Development and Design Principles for this site.	Support welcomed.	No change proposed
The open space should be protected for public benefit	The allocation seeks new public open space and protects the sports facilities	No change proposed
Support the protection of the Local Green Space	Support welcomed.	No changes proposed

Support the provision to provide new public open space, enhanced tennis facilities and an ancillary sports pavilion on site, open to the public.	Support welcomed.	No change proposed
Support the intention to secure reconfiguration and extension of the tennis courts to provide an additional court, which is consistent with Lawn Tennis Association requirements and the previous appeal.	Support welcomed.	No change proposed
An additional criteria should be added to maximise the preservation of existing trees and provide for new tree planting	We propose to update the allocation to refer to protecting existing trees on site.	Change proposed
Consider it is essential to ensure that nature and biodiversity of the site is protected.	We propose the update the allocation to note the importance of the identified ecology on site and the Natural Environment Local Plan Policy.	Change proposed
Identify no concerns regarding water supply network infrastructure or wastewater networks	Noted.	No change proposed
Identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comments noted. This is covered by the Local Plan policy NE4 – (Water Quality) and would be taken into account at the planning application stage.	No change proposed

Policy N3 - Queen Marys House

Summary of Comment	Council's Response	Proposed Changes to the Plan
Support the principle of the allocation for alternative uses.	Support welcomed.	No change proposed
Site should be retained to provide genuine social housing for essential	The allocation seeks to retain the affordable housing floorspace.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
workers who provide community and health services. No private sector housing should be provided.		
The previous use on the site provided accommodation as a residential institution and key worker accommodation.	Comment noted.	No change proposed
The policy inaccurately states there is existing affordable housing on site, which should be retained or replaced. There is an element of existing nurse / ancillary health care worker accommodation at Queen Mary's House. Update to amend any references to 'existing affordable housing' to 'nurses / ancillary health worker accommodation'. The allocation should allow for a flexible approach to re-providing nurses / ancillary health worker accommodation to reflect the Trust's need and demand.	The residential accommodation is considered to be affordable housing floorspace for key workers. The allocation is consistent with Local Plan housing polices which seek to protect affordable housing floorspace.	No change proposed
The text referring to requiring the retention of the original building as it is of significant historical interest should be removed as the Conservation Area Appraisal identifies it as making a 'neutral' contribution to the area.	Whilst it is noted that the building is currently identified in the Conservation Are Appraisal (2001) as making a neutral contribution to the area, Council conservation officer consider it has historical significance.	No change proposed
Do not agree with the need to retain the building as it is not fit for purpose. If demolished a newer	Comment noted. Retaining the original Queen Mary's House building is consistent with	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
modern structure would be more appropriate for our climate technologies and way of living.	Local Plan policy CC2 (Retention of Existing Buildings). Any application involving demolition would be considered on its merits against the site allocation, policy CC2 and other relevant policies.	
The requirement to retain the original building is too inflexible and overly restrictive. Demolition would allow for cross subsidy benefits associated with the disposal of the site and the opportunity to reinvest sales receipts into vital healthcare related services elsewhere. The principle of demolition should be allowed to be explored subject to being justified in design, townscape, planning and environmental terms.	Comment noted. Retaining the original Queen Mary's House building is consistent with Local Plan Policy CC2 (Retention of Existing Buildings). Any application involving demolition would be considered on its merits against the site allocation, Policy CC2 and other relevant policies.	No change proposed
Support demolition of the existing buildings as they are of no particular merit and redevelopment will allow for quality homes.	Comment noted. Retaining the original Queen Mary's House building is consistent with Local Plan Policy CC2 (Retention of Existing Buildings) and Local Plan Policy D5 (Heritage).	No change proposed
The indicative capacity should be returned to 150 homes as per the previous draft. This would be in line with Policy H1 objective to maximise housing supply and it will also help maximise the receipt achieved by the Trust to cross-subsidise and deliver on its wider estate	We propose to amend the indicative capacity to reflect the findings of further site capacity assessment work, consistent with the approach taken on other allocated sites. Proposals for substantial or full demolition of existing buildings will be assessed against	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the Plan
strategy and associated public benefits.	Policy CC2 and other relevant policies. If it can be demonstrated to the Council's satisfaction that an existing building/s cannot be retained and improved upon, and demolition is permitted, then the development capacity of the site will be agreed as part of the planning application process, in accordance with the development plan.	
Support policy criteria re affordable housing floorspace and preserving the landscape character of the site	Support welcomed	No change proposed
Support the requirement to preserve the landscape character.	Support welcomed	No change proposed
The reference to the prevailing character being 'low scale' is considered to be inaccurate as adjacent buildings are 4-5 storeys. The context should there be amended to medium scale.	It is proposed that the reference to the scale of the surrounding area is removed.	Change proposed
Identify no concerns regarding water supply network infrastructure or wastewater networks	Noted.	No change proposed
Identified relevant Environmental constraints • Bedrock Aquifer (unproductive)	Comments noted. This is covered by the Policy NE4 – (Water Quality) and would be taken into account at the planning application stage.	No change proposed

Policy N4 - Hampstead Delivery Office

Summary of Comment	Council's Response	Proposed Changes to the Plan
Development should only be for social housing, Houses not flats.	Any application would be assessed in relation to our Housing planning policies regarding mix and type. The priority of the Local Plan is to maximise our housing provision to assist in meeting our housing targets.	No change proposed
Object to the loss of a public space to homes. Neighbourhoods need more than homes. Site should be retained for a public use.	The allocation sets out the Council's preferred approach to the delivery of this site should it become surplus to Royal Mail requirements as a postal delivery office. Housing is the priority use of the Local Plan and a national and London wide priority.	No change proposed
Any redevelopment of the site should be car free	Any redevelopment of the site would be expected to be car free in accordance with Policy T5 (Parking and car free development).	No change proposed
If the existing delivery office use is intensified, only operational parking would be acceptable.	Any operational requirements would be considered as part of any planning application and would be assessed in accordance with Policy T5 (Parking and car free development).	No change proposed
Do not envisage infrastructure concerns regarding water supply or wastewater networks.	Comment noted.	No change proposed
Identified relevant Environmental constraints • Bedrock Aquifer (unproductive) • Protected Species (Threatened bryophyte record)	Comments noted. This is covered by the Policy NE4 – (Water Quality) and Policy NE2 (Biodiversity) and would be taken into account at the planning application stage.	No change proposed

Chapter 7 - Meeting Housing Needs

In total **262** representations were made on the Housing Chapter. Of these, **19** representations were received via commonplace and **243** representations were received via email.

Responses were received from the following consultees:

- Airspace Group
- Argent
- Birkbeck (University of London)
- British Land
- British Museum
- Camden Green Party
- Canal and River Trust
- Covent Garden Community Association
- Dartmouth Park Neighbourhood Forum
- Dominus
- Folgate Estates
- General Projects
- Greater London Authority
- Highgate Conservation Area Advisory Committee
- Home Builders Federation
- Joseph Homes
- Kentish Town Neighbourhood Forum
- LabTech
- Lazari Investments Ltd
- Lendlease & Euston owners
- LB Islington
- Lifecare Residents Ltd
- London Gypsies and Travellers
- London Property Alliance
- LS Finchley Road ltd
- Metropolitan Companies
- Network Rail
- NHS Healthy Urban Development Unit
- NHS Property Services
- One Housing and Countryside
- Places for London
- Primrose Hill Conservation Area Advisory Committee
- Regal London
- Royal Mail Group
- Royal Veterinary College
- Simten
- Shaftesbury Capital
- Somers Town Neighbourhood Forum
- St George West London Ltd
- Transport for London

- University College London (UCL)
- University of London
- Unite Group PLC
- Watkin Jones Group
- YC CFQ Ltd

General Comments

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support planning for new homes. Many vulnerable people are living in unsatisfactory accommodation.	Support welcomed.	No change proposed.
Westminster's plan also includes new measures aiming to increase the amount of "genuinely affordable" housing by prioritising social over intermediate housing in new schemes, and a requirement for all new residential schemes to contribute towards affordable housing.	The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable, as set out in Policy H4 (Maximising the Supply of Affordable Housing) Part A.	No change proposed.
Camden should ensure new homes of quality are built, not just quantity.	The Plan includes a number of design policies to ensure that high quality new homes are built in Camden, including D1 Achieving Design Excellence, and Policy D3 Design of Housing.	No change proposed.
Nothing in here about type of homes, Camden needs more family sized homes for social rent not more private 1 beds.	Policies H4 (Maximizing the supply of affordable housing) and H6 (Housing choice and mix) outline the Council's approach to achieving an appropriate mix of market and affordable housing types. The Council's dwelling size priorities are also set out in the supporting text to Policy H7 (Large and Small Homes).	No change proposed.
The supply of homes to meet existing and future needs must include accessible homes.	Policy H6 Housing Choice and Mix, Part B vi) highlights that the Council will require accessible and adaptable	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	housing to be provided in accordance with Policy D3 – Design of Housing.	
Affordability and accessibility of homes needs to be prioritised for disabled residents including students living in Camden and prospective professionals.	The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable, as per draft policy H4 Part A (Maximizing the supply of affordable housing). Policy H6 Housing Choice and Mix, Part B vi) highlights that the Council will require accessible and adaptable housing to be provided in accordance with Policy D3 – Design of Housing.	No change proposed.
Support for policies catering for travellers. Importance of safe homes for vulnerable people.	Support welcomed.	No change proposed.
Suggestion to build high quality social housing, built to last, and rented out at social (1/3 market) rent. To be paid for using a Land Value dividend.	Maximising the supply of housing is a priority for the Local Plan, and the Plan includes a number of policies aimed at securing high quality, well designed development. Furthermore, through the Community Investment Programme, the Council proposes to deliver 4,850 new homes, of which 1,800 will be new or replacement Council homes, and 350 will be new intermediate homes for rent.	No change proposed.
There is a need for larger (3-Bed) homes, but also a shortage of suitable opportunities for people to downsize locally.	Policies H4 (Maximizing the supply of affordable housing) and H6 (Housing Choice and Mix) outline the Council's approach to achieving an appropriate mix of market and affordable housing types. The Council's dwelling size priorities are also set out in	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	the supporting text to Policy H7 (Large and Small Homes).	
Long term empty office buildings could be re-purposed for housing.	Under Policy IE2 Offices, where the Council is satisfied that a continuing office use is no longer feasible, the preferred alternative use is housing.	No change proposed.
There is a shortage of homes for wheelchair users. Large developments should provide more than 10% wheelchair accessible homes to address the existing deficiency. Accessible housing should include adequate door widths and adapted kitchens to enable independent living where possible.	Draft Policy H6 sets out the Council's approach to Housing choice and mix. Part B vi) notes the Council will require accessible and adaptable housing. Policy D3 relates to Design of Housing specifically. This requires 10% of new-build self-contained homes in a development to be wheelchair user dwellings and 90% to be accessible and adaptable.	No change proposed.
Concern for the number of older people in residential or nursing homes who are supported outside of the borough. Isolation from family and friends creates harmful impacts. Want to see lifetime homes and lifetime neighbourhoods.	Draft policy H8 sets out the Council's expectations with regards to housing for older people, homeless people and others with care or support requirements, including independent living, adaptable housing, and targeting development to existing borough residents. The Council will also resist any loss of specialist floorspace.	No change proposed.
There is concern for the number of community mental health beds situated outside of the borough. Does this reflect the move from St Pancras Hospital to Archway, or are the majority of beds located further away? There is an urgent need for local meanwhile mental health services whilst development at St Pancras hospital is carried out.	Comments noted. This is not a matter for the Local Plan, however we have shared your comment with the relevant Council service. Officers have been in discussion with NHS partners to identify the infrastructure required to support the plan, and this is reflected in the infrastructure delivery plan which will be published alongside the updated version of the Plan.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
We wish to see policies which safeguard both adequate living standards and local economies, to prevent unsuitable conversion of commercial premises into poor homes.	Policy IE6 (Supporting Camden's Designated Centres) resists the loss of active ground floor uses in centres to ensure the vitality of the centre is retained. The Council has also brought in Article 4 Directions to withdraw the Class MA permitted development right to change from Use Class E (Commercial, Business, and Service) to Use Class C3 (dwellinghouses) for parts of the borough where there exists strong justification, to protect the vitality of Camden's Centres.	No change proposed.
Servants' accommodation should not be provided that is of a poor standard. Accommodation should benefit from enough space, light, and facilities without harmful impacts from noise/ pollution generating plant, vehicles or other disturbance.	Comments noted. Draft policy D3 set out the Council's approach to Design of Housing. All housing must be designed and built to create high quality accessible homes. This is in line with the London Plan 2021 and Nationally described space standards.	No change proposed.
Welcome policies which seek to deliver new homes, particularly affordable homes, and a mix of dwellings, in terms of size, type and tenure. For Islington, the development planned in South Camden around King's Cross is of particular interest, as this is located near to the borough boundary. We would welcome continued engagement in the future planning of these areas/sites to consider cross-boundary impacts.	Support welcomed. Comments noted. The Council will continue to engage with neighbouring boroughs including LB Islington under the Duty to Cooperate.	No change proposed.
The draft Local Plan should include reference to residential moorings. The Canal and River Trust's London Mooring	We propose to update Policy H6 in relation to residential moorings to state that the Council will support the	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Strategy identified a substantial growth in the number of boats on our waterways in London. Suggest that the Local Plan should include a specific policy regarding residential moorings. Would also support planning policies that require new waterside developments to assist the delivery of new residential moorings, for example by providing new access routes to the canal side, space for services or utilities connections.	creation of additional residential moorings in conjunction with the development of sites adjacent to the Regent's Canal where this is consistent with optimising the use and development potential of the site, the protection and enhancement of the Canal's biodiversity and nature conservation value, the Canal's open space designation, the historic interest and character of the Regent's Canal Conservation Area, and the London Mooring Strategy.	
Recognise the need to ensure an appropriate balance is struck between all waterway users. Local plans should ensure that waterways are subject to policies specifically drafted to take account of the issues relevant to them and not impose blanket open space or Metropolitan Open Land policies on them.	Comments noted.	No change proposed.
Support for ambition to build 11,550 new homes. New development should complement existing communities, provide the housing that is most needed, and not have a detrimental impact on the environment.	Support welcomed. Plan policies seek to ensure that development meets needs and does not have a harmful impact.	No change proposed.
All new developments should: o Have a strategic target of 50% affordable housing. o Provide affordable housing on-site, rather than off-site, so that new developments have mixed tenure from the outset, enabling communities to be better integrated and socially cohesive.	Draft policy H4 sets out the Council's support for the London Plan's Strategic target for 50% of new homes to be genuinely affordable. Draft policies H1 and H2 seek to maximise the supply of housing, whilst H4 relates to affordable housing. H4 Part B ix) confirms affordable	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
o Meet PassivHaus standards for quality, comfort and energy efficiency, avoiding allowing developers to make payment in lieu of designing suitably carbon net zero buildings.	housing provision should be on-site for developments of 10 or more units. Payment in lieu will only be accepted in exceptional circumstances, having explored on/ off site provision. Local Plan policy CC6 includes targets for reducing heating demand and energy use. A payment in lieu will be acceptable only where the Council is satisfied all possible measures have been explored.	
Developers are given too much flexibility to vary the mix of housing. Increasing the amount of social housing must always be the priority.	Policy H4 sets out the Council's approach to maximising the supply of affordable housing, with the supporting text to the policy providing further guidance. A degree of flexibility is built into the policy however to allow for the consideration of the financial viability of development schemes, consistent with national policy. This draft policy builds on the existing approach which is considered to be working effectively.	No change proposed.
New homes should be the right size for families in greatest need on the social housing waiting list. Strict policies should ensure no new homes are left vacant.	Policy H7 (Large and Small Homes) sets out the Council's dwelling size priorities for low cost rented, intermediate affordable and market homes. The policy gives high priority to three bedroom low cost rented housing, recognising the significant need for larger family homes in Camden. Policy H1 (Maximizing Housing Supply) also states that the Council will work to return vacant homes to use and ensure that new homes are occupied.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support for ambition to bring empty homes in to use. Council tax penalties are too low. A sequential premium should be added increasing 100% each year.	Support welcomed. The supporting text at paras 7.13 0 7.15 outlines the Plan's approach to ensuring homes are occupied. Although mentioned in the Draft Local Plan, Council tax penalties are not a matter that can be influenced by the Plan. We have passed your comments on to the relevant Council Service.	No change proposed.
Support for increase in council tax for second homes but question whether this is sufficiently high.	This is not a matter that the Local Plan can control. We have passed your comments on to the relevant Council Service.	No change proposed.
Request for more detail regarding the goal to resist conversion of permanent residential use to short term lets. The plan should set out the extent of the problem and seek to reduce it rather than simply stopping it increasing further.	Under the current legislation applicable to London, planning permission is required for a residential property to be used for short-term lets (let for periods of less than 90-days) unless the use is restricted to a total of 90 days in any one year. We propose to update the Plan to set out the extent of the problem in respect of short term lets in Camden. The Plan is clear that given the threat that the growth of this use poses to the rental housing market and the delivery of new permanent homes, the Council will resist the development of housing for use as short-term lets, unless the site is shown to be unsuitable for the provision of any form of permanent housing.	Change proposed.

H1 - Maximising Housing Supply

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Make sure other local resources are sufficient or directly proportional to the policy of maximising new affordable houses.	Comments noted.	No change proposed.
Support for general aims. However, concerns that West Hampstead is in danger of becoming overdeveloped, with loss of valuable services and air space.	Support welcomed. Comments noted.	No change proposed.
More attention should be given to converting existing/vacant commercial premises to residential, upper floors over shops etc. empty office buildings.	Draft policies H1 and H2 seek to maximise the supply of housing, including via mixed use developments. Policy IE2 Offices also supports the conversion of offices to housing subject to a number of criteria.	No change proposed.
Concerns regarding the number of vacant homes in the borough and the effectiveness of measures, e.g. Council tax penalties. Hampstead House has stood vacant for considerable time. There is little confidence in the Council's ability to enforce its rules. Even if new developments are sold residents cannot afford to rent or buy them, so who are they for?	Draft Plan paragraphs 7.13 – 7.15 are specifically concerned with ensuring homes are occupied. Although mentioned in the draft Local Plan, matters such as Council tax penalties cannot be influenced by the Plan. We have passed your comments on to the relevant Council Service.	No change proposed.
Providing the housing that our population requires is a laudable and vital goal Should not move in the direction of hyperdensity in places like Hong Kong.	Draft Policy H3 seeks to ensure that housing development meets the residential design standards set out in the London Plan and nationally described space standards. Policy A1 – Protecting Amenity seeks to protect the quality of life of future and existing occupiers and	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	neighbours and resists development that causes unacceptable harm to amenity.	
The target for delivery of 770 homes per year is too little. Camden is unaffordable because there are too few housing units. There is too little construction. It should be made easier to build new houses.	The Local Plan seeks to maximise housing supply in Camden based on the delivery of available development sites and aims to deliver a minimum of 11,550 additional homes over the plan period to 2041. This factors in the London Plan housing target for Camden of 1,038 homes per year for the first three years of the Plan period (2026/27, 2027/28 and 2028/29), and also includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period). The housing target in the Local Plan is a capacity-based figure, based on the limited land available in Camden and expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in an allowance for unallocated small sites delivering under 10 additional homes (based on evidence of past delivery).	No change proposed.
The priority for permanent self-contained housing is generally supported.	Support welcomed.	No change proposed.
Welcome policy H1 – Maximising Housing Supply, Parts B i) and ii).	Support welcomed.	No change proposed.
Support for the need for greater housing delivery to meet existing and future needs. Note the	Support welcomed,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
emphasis on delivery of permanent self-contained homes.		
Policy H1 fails to acknowledge benefits brought about though provision of diverse housing types, nor the challenges in retro fitting self-contained dwellings for specific residential needs.	Draft policy H1 is concerned with maximisation of housing supply. Other policies in the Plan support the delivery of diverse housing types (e.g.H6 and H7) and promote retrofitting (namely CC5).	No change proposed.
The London Plan is supportive of the provision of specialist older person housing. It considers that non-self-contained accommodation for older people in care homes (C2 Use Class) should count towards meeting housing targets on a 1:1 ratio, with each bedroom being counted as a single home. Request that draft Policy H1 specifically acknowledges specialist and purpose-built forms of accommodation and expands the priority to self-contained and specialist forms of housing.	Draft Plan Policy H8 specifically relates to supporting the provision of housing for older people. However, we propose to update policy H1 Part B to include reference to "supporting other forms of permanent housing to meet more specific needs, such as purpose- built student accommodation and housing for people with care or support requirements".	Change proposed.
Support for the principle of maximising housing supply. However the policy does not support short term lets. Local Plan Policy H1 resists shared-living accommodation, which is contrary to London Plan Policy H16, which specifically provides for the development of large-scale purpose-built shared living (i.e. co-living). Supporting the provision of purpose-built co-living would have the benefit of indirectly creating more family homes. Recommend that the new Local Plan contains explicit support for the	The growing use of new and existing homes in Camden for short-term lets threatens to seriously reduce the stock of housing available to long-term residents, whilst proposals to create new housing specifically for short-term lets threatens our ability to meet targets for delivery of permanent housing. Given this, we will continue to resist the further development in Camden of housing for use as short-term lets, unless it can be	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
development of purpose-built co-living accommodation, to ensure that it is legally compliant with the London Plan, and meets the NPPF test of being 'positively prepared'.	demonstrated to the Council's satisfaction that the site is unsuitable for the provision of any form of permanent housing. Policy H10 sets out the Council's approach to housing with shared facilities, which includes purpose built shared living, in line with the London Plan.	
The O2 Masterplan Site is expected to provide 15% of the boroughs housing need over the plan period 2041.	Comment noted.	No change proposed.
There is no acknowledgement within paragraph 7.9 of the important role that Class C2 housing for older people can have on housing delivery. An additional bullet point should be added beneath paragraph 7.9 to state "Specialist older persons housing (Class C2)" in order to be consistent with the London Plan.	Draft Plan Policy H8 specifically relates to supporting the provision of housing for older people. However, we propose to update policy H1 Part B to include reference to "supporting other forms of permanent housing to meet more specific needs, such as purpose-built student accommodation and housing for people with care or support requirements".	Change proposed.
11,550 additional homes over the period would represent potentially too few homes. The Council will be expected to deliver the London Plan housing target by 2028/29	The Local Plan aims to deliver 11,550 additional homes in Camden over the Plan period 2026/27 to 2040/41. This target has been derived in accordance with the guidance in the London Plan and includes the remaining three years of the Camden target for 2019/20 to 2028/29 from the London Plan, and the anticipated backlog against this target at the start of the Local Plan period.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The Council will need to include the backlog accumulated against the London Plan from 2018/19 into its new housing requirement.	We propose to update the Plan to make it clear that the housing target includes the cumulative backlog from 2019/2020 (the first year of the London Plan period).	Change proposed.
Policy H1 of the London Plan is clear that the housing requirements stipulated must be delivered by each of the planning authorities. There is also a growing push within Government and the Greater London Authority that each London borough is expected to deliver its apportioned housing requirements in full by the end of the London Plan date.	The Local Plan aims to deliver 11,550 additional homes in Camden over the Plan period 2026/27 to 2040/41. This target has been derived in accordance with the guidance in the London Plan and includes the remaining three years of the Camden target for 2019/20 to 2028/29 from the London Plan, and the anticipated backlog against this target at the start of the Local Plan period.	No change proposed.
The extent of the under-delivery against the London Plan has become a matter of concern to the Government.	Comment noted.	No change proposed.
For the years 2026/27, 2027/28 and 2028/29 Camden will be required to deliver at least 1,038 homes a year plus any remaining backlog that has accumulated since 2019/20. From 2029/30 onwards, it may draw upon the data in the GLA SHLAA 2017 for capacity post 2028/29 up to 2041 until a new London Plan is adopted or published.	Comment noted. The housing target in the Plan has been derived in accordance with the guidance in the London Plan and includes the remaining three years of the Camden target for 2019/20 to 2028/29 from the London Plan.	No change proposed.
It is unclear from the draft Local Plan what data precisely the Council is drawing upon from the GLA SHLAA 2017 to base its housing requirement up to 2041.	The housing target in the Plan has been derived in accordance with the guidance in the London Plan and includes the remaining three years of the Camden target for 2019/20 to 2028/29 from the London Plan.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	The housing target is a capacity-based figure, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in an allowance for unallocated small sites delivering under 10 additional homes (based on evidence of past delivery). It also includes the cumulative backlog from under-delivery of completed homes against the London Plan housing target from 2019/2020 (the first year of the London Plan period) and reflects the uncertainty and delay in development at Euston. A review of the London SHLAA 2017 was undertaken to inform both site allocations in the Plan and the housing target. It should however be noted that this work is almost 8 years old now and the GLA is undertaking a new SHLAA to support the review of the London Plan. Officers are working jointly with the GLA on this, as it will help to inform Camden's new housing target in the next London Plan.	
The Council need to explain the derivation for the requirement for 770 homes per year. This may represent a shortfall against London Plan expectations.	The Local Plan aims to deliver 11,550 additional homes in Camden over the Plan period 2026/27 to 2040/41. This target has been derived in accordance with the guidance in the London Plan and includes	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	the remaining three years of the Camden target for 2019/20 to 2028/29 from the London Plan, and the anticipated backlog against this target at the start of the Local Plan period. The 770 homes is not an annual requirement, it simply illustrates what the overall target would be if divided equally across the 15 years of the Plan period.	
There are no specific actions in relation to increasing delivery from small sites despite London Plan policy H2 making this a matter of strategic importance, and setting a small sites target for Camden of 3280 homes on sites less than a quarter of a hectare. It would be helpful if the draft local Plan explained how this requirement of national and London Plan policy will be discharged. Relying simply on windfall would not necessarily ensure that homes on small sites will materialise.	Draft policy H1 seeks to maximise the supply of housing on all sites, and is not restricted to major development. The approach is considered consistent with the London Plan and NPPF. Given the limited availability of land in Camden, over 50% of the sites we have allocated for housing have areas of less than 1 hectare, which is consistent with NPPF guidance on sites for small and medium sized house builders.	No change proposed.
The London Plan encourages boroughs to identify and allocate small sites. It would be helpful if the Council could provide a list of allocated small sites and the number of homes expected. This will provide a sense of the reliance on windfall. Over-reliance on windfall will risk the London Plan objective of supporting SME house builders not being realised.	The Local Plan allocates a number of sites for housing that are less than 0.25ha. The Plan also sets out the site size for each allocation. A list of sites that are under 0.25ha will be set out in a Topic Paper to support the examination of the Local Plan.	No change proposed.
It is unclear if the Council is intending to supply 770 dwellings per annum evenly, for each year of the Plan, or if it has an alternative trajectory of delivery in	The housing trajectory assumes that the current London Plan target for Camden (effectively 1,038 additional homes per year)	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
mind. The trajectory will need to reflect how the backlog will be addressed. It is considered the backlog cannot be deferred until after 2029.	will continue to apply from 1 April 2026 to 31 March 2029, and that a target of 703 additional homes per year will apply thereafter. Whilst the housing target takes into account the backlog, we do not propose to apply the entire backlog to the annual targets for the first five years of the Plan period.	
Support the Council's approach to monitor the delivery of additional homes	Support welcomed	No change proposed.
Draft policy H1 makes no direct reference to increasing housing delivery from small sites. London Plan policy H2 makes it clear that small sites are a strategic issue for London, with a target of 3280 new homes on small sites. Recognition and more deliberate planning policy should be made within the new Local Plan, including a specific small sites policy. This should reference upward extensions of existing buildings. Include further small sites within the site allocations. This would reduce the reliance on 'windfall' sites and could include properties such as Darwin Court, Clare Court, Endsleigh Court and Witley Court which have the ability to deliver up to 30 new homes.	The housing target in the Local Plan is a capacity-based figure, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in an allowance for unallocated small sites delivering under 10 additional homes (based on evidence of past delivery). Given the limited availability of land in Camden, over 50% of the sites we have allocated for housing have areas of less than 1 hectare, which is consistent with NPPF guidance on sites for small and medium sized house builders. Whilst cumulatively the sites suggested may deliver 30 homes, individually the sites are considered too small for allocation as they are considered to each deliver less than 10 homes each and would therefore not meet the threshold for allocation in the Plan.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Paragraph 124 (e) of the NPPF makes it clear councils should support use of airspace above existing buildings for new homes. Airspace development and upward extensions can play an important role in housing delivery. Further recognition in the Council's planning policy is needed to align with national planning policy.	Draft Local Plan Policy D4 Extensions and Alterations supports the extension and alteration of houses to deliver increased residential floorspace or additional homes.	No change proposed.
Flexibility for the Euston masterplan in the way described in this policy is welcome in the context of the very long-term delivery timeframe of the project and in light of the fact that the project is now required to fund HS2 at Euston. Retaining flexibility within large-scale brownfield regeneration projects needs to be recognised, particularly where a scheme may need to be a commercial-led mixed use development rather than a residential-led mixed-use development. Retaining flexibility on use mix is important to optimise development value to the Euston Landowners.	We propose to include a new policy in the local plan to support the delivery of development at Euston, with further guidance to be provided through the updates to the Euston Area Plan. We consider there is sufficient flexibility in policy H1 and the plan in general to support the delivery of development in Euston.	No change proposed.
Welcome the proposed implementation of a four-fold council tax payable on homes kept empty for 10 years or more. Request the Council consider further increasing the planned premiums of 100% where a home has been empty for 2 years and 200% where the property remains empty for 5 years or more.	Although mentioned in the Draft Local Plan, Council tax penalties are not a matter that can be influenced by the Plan. We have passed your comments on to the relevant Council Service.	No change proposed.
Welcome decision by the Council to implement a 100% premium on council tax for second homes. Urge the council to consider further increasing the premium to 200% or 300% to increase the	Although mentioned in the Draft Local Plan, Council tax penalties are not a matter that can be influenced by the Plan. We have passed your	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
likelihood of bringing the properties into use.	comments on to the relevant Council Service.	
Welcome commitment to resist short term lets in place of permanent homes. It would be useful for the Plan to include an indication of how large this problem is currently and how it can be reduced.	We propose to update the Plan to refer to the current position. In Camden there are over 4,000 short-term lets being offered for aggregate periods exceeding the 90-day restriction, and over 5,000 entire homes being marketed for short-term lets.	Change proposed.
The draft local policy H1 sets out a target equivalent to 770 homes per year until 2041 which is significantly below the current annualised London Plan target and is of concern. The draft plan states the figure is derived from rolling forward the small sites target as per table 4.2 of the London Plan as well as accounting for large sites in the 2017 SHLAA referenced at 4.1.11 of the London Plan 2021. However, there is greater uncertainty with sites in the 2017 SHLAA with later phases not coming forwards or new sites emerging since the SHLAA. London Plan para 4.1.11 sets out that when calculating housing targets beyond 2029, boroughs should include additional capacity from any committed transport infrastructure improvements, and the call for sites process. Sites may also be identified through the ongoing LAND4LDN work which is part of the London Plan review.	The housing target in the Plan has been derived in accordance with the guidance in the London Plan and includes the remaining three years of the Camden target for 2019/20 to 2028/29 from the London Plan. The housing target is a capacity-based figure, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in an allowance for unallocated small sites delivering under 10 additional homes (based on evidence of past delivery). It also includes the cumulative backlog from under-delivery of completed homes against the London Plan housing target from 2019/2020 (the first year of the London Plan period) and reflects the uncertainty and delay in development at Euston. A review of the London SHLAA 2017 was undertaken to inform both	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	site allocations in the Plan and the housing target. It is however recognised that this work is almost 8 years old and the GLA is undertaking a new SHLAA to support the review of the London Plan. Officers are working jointly with the GLA on this, as it will help to inform Camden's new housing target in the next London Plan.	
LBC should ensure that in the evidence base to support the draft Plan, densities are set at an appropriate level making the best use of land.	The housing target in the Local Plan is a capacity based target factoring in sites that are allocated in the Plan, the Euston Area Plan, planning permissions and a small sites windfall allowance. Design-led capacity work has been undertaken for all the sites allocated in the Plan that are not subject to planning permission / identified in a Planning Framework. The capacity work has been undertaken taking into account the approach in the London Plan and local policy considerations. This work will be set out in a Topic Paper that will be submitted to the examiner to inform the examination of the Plan. Furthermore, Policy DS1 states that the Council will ensure that land is used efficiently, and that a development makes best use of its site. It also goes on to state that the Council will resist development that	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	makes inefficient use of Camden's limited land. In addition to this Policy H1 states that we will seek to optimise the homes delivered on all sites using a design led approach.	
Draft plan policy H1 should set out any shortfall in delivery since 2019 and factor this into the overall housing need. Any shortfall should be made up over the remaining London Plan period to 2029. Welcome recognitions that the forthcoming London Plan review would likely change Camden's housing target. It is recommended that there is flexibility within the draft plan to safeguard this. The current London Plan does not meet identified need and therefore overall required housing should not be expected to reduce.	The Local Plan aims to deliver 11,550 additional homes in Camden over the Plan period 2026/27 to 2040/41. This target has been derived in accordance with the guidance in the London Plan and includes the remaining three years of the Camden target for 2019/20 to 2028/29 from the London Plan, and the anticipated backlog against this target at the start of the Local Plan period. We propose to update the Plan to make it clear that the imminent review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the target that is in the new Local Plan. We are aware that the GLA are aiming to adopt the new London Plan in 2027, so this may mean that Camden's new Local Plan housing target is only in place for a short period of time.	Change proposed.
Welcome reference to LPG on Small Sites Design Codes and Optimising Site Capacity: A Design Led Approach. It will be crucial in light of the overall low housing figures to ensure that	Support welcomed. The housing target in the Local Plan factors in an allowance for unallocated small sites delivering under 10 additional homes (based	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
LBC's policy framework provides a positive and clear approach to drive up delivery of homes on small sites.	on evidence of past delivery). Furthermore, given the limited availability of land in Camden, over 50% of the sites we have allocated for housing have areas of less than 1 hectare, which is consistent with NPPF guidance on sites for small and medium sized house builders.	
Draft policy H1 and chapter 7 generally have some quite specific build standard requirements that may have viability impact at Euston generally. There is essentially a presumption that sites should be developed for housing unless it can be proven unviable. Suggest that it is better understood how this might apply at Euston, which remains commercially led mixed use. Retaining flexibility is important for Landowners to optimise development value.	We propose to include a new policy in the local plan to support the delivery of development at Euston, with further guidance to be provided through the updates to the Euston Area Plan. We consider there is sufficient flexibility in policy H1 and the plan in general to support the delivery of development in Euston.	No change proposed.
Support resistance to short term lets. Please add to the text an intention to condition any consents for new dwellings so that tenancies are far longer than 90 days, though. We would like to see 2-3 year tenancies offered as a minimum for all new dwellings if they are rented out, to go some way to rebuilding a stable community.	In London, the Greater London Council (General Powers) Act 1973 (as amended by the Deregulation Act 2015) provides for Council Tax payers to let their property as visitor accommodation for short periods not exceeding a total of 90 days in any one calendar year. Draft Plan paragraphs 7.8 - 7.15 set out the Council priority for permanent self-contained homes and ensuring homes are occupied. It is not considered appropriate or	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	enforceable to condition such a measure to all new rented dwellings.	
Support the aspirations of Policy H1 which seeks to maximise housing supply in the borough. Recognise the importance of self-contained homes as a priority. Alternative forms of housing can provide an opportunity to unlock challenging sites and contribute to housing targets. Flexibility should be applied with sites reviewed on a case-by-case basis as suggested within the supporting text at para 7.24. Agreement that the delivery of homes should be optimised through a design-led approach, which is in line with the London Plan.	Support welcomed. We propose to update policy H1 Part B to include reference to "supporting other forms of permanent housing to meet more specific needs, such as purpose- built student accommodation and housing for people with care or support requirements".	Change proposed.

H2 - Maximising the Supply of Self-contained Housing from Mixed Use Schemes

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
It is important that the policy is applied holistically to the allocation rather than to individual parcels. A pragmatic approach is required to avoid unfairly prejudicing sites which are constrained and cannot incorporate residential whether on viability or other grounds or a combination.	Comment noted. The supporting text to policy H2 sets out further information on how the policy should be applied.	No change proposed.
It is suggested that additional wording is added that incorporates 'ancillary office space associated with educational institutions' into the list of public buildings/ facilities to reflect the fact that	No change is considered necessary, as ancillary space associated with a publicly funded educational institution, would be considered part of the overarching use, and would therefore be exempt from H2.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
this type of floorspace also forms part of the University's estate Amend the first sentence of paragraph 7.38 as follows: "We will not seek a contribution from those elements of a development that are publicly funded or otherwise serve a public purpose, such as hospitals, educational, medical and research institutions (including ancillary office floorspace), and transport infrastructure and facilities."	Furthermore the supporting text to H2 states that we will not seek a housing contribution from development of non-residential floorspace secured for occupation by a Higher Education institution which is supported by the Office for Students, and thereby serves a public purpose. In addition, where development is proposed by a Higher Education institution supported by the Office for Students, as an alternative to seeking permanent self-contained housing, the Council may support a mixed-use development including student housing (known as purpose-built student accommodation) that serves the same institution, subject to the student accommodation satisfying the requirements of Policy H9.	
Since 2015, market and economic conditions have changed, including increased build costs. It would therefore be useful for the Council to carry out an updated viability assessment to demonstrate that H2 remains deliverable, in order to ensure the new local plan is justified as per the NPPF.	The draft Local Plan was subject to viability assessment which can be found on the Council's website Evidence - Camden Council The policy allows for the consideration of the economics and financial viability of the development.	No change proposed.
Acknowledge that Camden's priority is the delivery of self contained housing but requiring housing from commercial-led schemes undermines other policy objectives in the Plan and the London Plan which promote economic development within the Borough and in particular	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
within the Central Activities Zone and Knowledge Quarter. The adopted local plan policy H2 is in direct conflict with the London Plan and threatens to undermine deliverability of commercial development. Camden is the only borough in London with a mixed use policy, which impacts its commercial attractiveness. . It is acknowledged that Camden is falling short of achieving its annual housing targets. However, we do not consider the requirement for housing to be delivered alongside and to the detriment of commercial development in central London as an appropriate or justified strategy for addressing this issue. We therefore consider that Policy H2 should be deleted.	Furthermore, due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against the housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. We consider that policy H2 is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. It has been established over many years and has operated successfully. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies.	
We do not consider that any form of mixed-use policy should apply in the Central Activities Zone or the Knowledge Quarter. The Plan should recognise the specialist nature of the Knowledge Quarter and life science developments in particular, the strategic objectives for this sector and the challenges that it has in delivering housing.	Policy S1 South Camden recognises that the Knowledge Quarter and CAZ should be the main focuses of employment development in Camden. Self-contained housing is however the priority land-use of the Plan, due to the acute need for housing in Camden (particularly affordable housing). The Council is required to deliver against housing targets and given this, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing.	No change proposed.
If a form of mixed-use policy is to remain in the Local Plan	Policy H2 is clear that where self-contained housing cannot	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
and be applicable to the Central Activities Zone and the Knowledge Quarter, we consider that it should focus on a financial contribution to be used on other Camden housing developments in the Borough rather than requiring housing to be provided on site or off site. This approach would prioritise employment space, and enable delivery of new homes on Camden's own estates.	practically be provided on-site or off-site the Council may accept payment in lieu in exceptional circumstances. It is considered that the delivery of additional housing in the areas covered by the policy, including the CAZ, will help provide activity and surveillance when businesses are closed, enliven marginal areas at the periphery of established frontages, and support shops, services and local facilities.	
An alternative approach would be for the Policy to seek a financial contribution on small / medium sized schemes proposing increases in floorspace of up to 2,000 sqm, below which it is most challenging to provide the housing as part of a commercial scheme and prioritise housing / affordable housing delivery on larger schemes. Also suggest that the Policy is clear that where housing is required under any form of mixed-use policy, that the Council will prioritise the delivery of affordable housing.	Demand for housing and general housing need in Camden is such that it is imperative that the Council seeks housing delivery from all available potential sources. Policy H2 is clear that where self-contained housing cannot practically be provided on-site or off-site the Council may accept payment in lieu in exceptional circumstances. With regards to affordable housing delivery, the supporting text to Policy H2 states that where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the Council will prioritise delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4. For example, in the past we have accepted proposals which omit the market housing but deliver the entire affordable housing component, and schemes which deliver only affordable housing by switching the tenure of market homes to be	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	delivered elsewhere (not yet built, but benefitting from a live planning permission).	
Paragraph 7.28 should cross refer to paragraph 7.9 which sets out the other forms of housing that would also be considered to constitute self-contained housing and contribute towards meeting housing targets.	We propose to update the supporting text to add a cross reference to para 7.9.	Change proposed.
The Council is aware that the opportunity to find an off-site housing site within the Borough is rare and if one is found, the cost of acquiring the site renders many schemes unviable. Introducing an 800-metre distance in terms of the initial search area is onerous and unrealistic. Furthermore there is no evidence to support the requirement. Criteria for off-site suitability should be based on appropriateness in order to maximise benefits from the host and donor sites.	We propose to update the supporting text to remove reference to the need to find alternative sites within an 800m straight line distance of the development.	Change proposed.
Paragraph 7.28 should cross refer to paragraph 7.9 which sets out the other forms of housing that would also be considered to constitute self-contained housing and contribute towards meeting housing targets.	We propose to update the supporting text to add a cross reference to para 7.9.	Change proposed.
Acknowledging the priority is delivery of self-contained housing, but do not agree that this should be at the expense of commercial led schemes. Camden is the only borough in London with a mixed use policy, affecting its attractiveness for investors compared to other parts of	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses, such as hotels, and from alternative forms of housing such as purpose-built student accommodation.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
the CAZ and other knowledge clusters.	Furthermore, due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against the housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. We consider the approach in policy H2 is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. It has been established over many years and has operated successfully. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies.	
The requirement to provide housing under the existing wording of Policy H2 often means that proposals are unviable and developers will look to invest in alternative Boroughs. The Council is aware of instances where individual commercial sites are not maximised to their full potential to reduce the housing requirement Policy H2 does not meet national policy, does not meet the necessary tests in terms of being fairly and reasonably related in scale and kind to a commercial led development and should be deleted. If the	Policy S1 South Camden recognises that the Knowledge Quarter and CAZ should be the main focuses of employment development in Camden. Self-contained housing is however the priority land-use of the Plan, due to the acute need for housing in Camden (particularly affordable housing). The Council is required to deliver against housing targets and, given this, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. We disagree that H2 does not	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Council is minded keeping Policy H2 it should not be applicable in the CAZ.	accord with national policy. Furthermore, the approach has been found sound at previous local plan examinations.	
IF H2 is retained the Council should accept a financial contribution for small / medium sized schemes generating up to 2,000 sqm increase, where it is often more difficult to provide the housing as part of the scheme), and prioritise housing / affordable housing delivery on larger schemes with priority for the delivery of affordable homes.	Demand for housing and general housing need is such that it is imperative that the Council seeks housing delivery from all available potential sources. Policy H2 is clear that where self-contained housing cannot practically be provided on-site or off-site the Council may accept payment in lieu in exceptional circumstances. With regards to affordable housing delivery, the supporting text to Policy H2 states that where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the Council will prioritise delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4. For example, in the past we have accepted proposals which omit the market housing but deliver the entire affordable housing component, and schemes which deliver only affordable housing by switching the tenure of market homes to be delivered elsewhere (not yet built, but benefitting from a live planning permission).	No change proposed.
Paragraph 7.28 should cross refer to paragraph 7.9 which sets out the other forms of housing that would also be considered to constitute self-contained housing and contribute towards meeting housing targets.	We propose to update the supporting text to add a cross reference to para 7.9.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The Council is aware that the opportunity to find an off-site housing site within the Borough is rare and if one is found, the cost of acquiring the site renders many schemes unviable. Furthermore there is no evidence to support the requirement. Criteria for off-site suitability should be based on appropriateness in order to maximise benefits from the host and donor sites. A financial contribution towards upgrading existing Council estates, bringing back existing empty homes into use and providing for new housing should be the key objective.	We propose to update the supporting text to remove reference to the need to find alternative sites within an 800m straight line distance of the development.	Change proposed.
The mixed-use policy requiring housing from commercial schemes is increasingly challenging in viability terms and threatens to undermine the deliverability of commercial development and consequently the continued sustainability and improvement of town centres, growth areas and the CAZ. Camden is the only central London borough with a mixed use policy, making it more challenging and less enticing for development.	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses, such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Furthermore, due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. We consider the approach in policy H2 is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	provision. It has been established over many years and has operated successfully. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies. The draft Local Plan was also subject to viability assessment, which can be found on the Council's website.	
This policy creates conflict with the need to look at refurbishment/ retrofit first as it renders many redevelopment options for existing commercial buildings unviable as extra staircases/lifts for different land uses would need to be inserted into buildings.	It is considered that the Plan is sufficiently flexible to enable a judgement on planning balance to be made at the planning application stage. The draft Plan has been subject to viability assessment, which can be found on the Council's website.	No change proposed.
Policy H2 does not meet national policy, does not meet the necessary tests in terms of being fairly and reasonably related in scale and kind to a commercial led development and should be deleted. However, if a mixed use policy is to remain in the draft plan, it is suggested that this should focus on a financial contribution for use by Camden housing developments.	We disagree that H2 does not accord with national policy. Furthermore, the approach has been found sound at previous local plan examinations. Policy H2 is clear that where self-contained housing cannot practically be provided on-site or off-site the Council may accept payment in lieu in exceptional circumstances.	No change proposed.
An alternative approach would be to accept a financial contribution for small / medium sized schemes generating up to 2,000 sqm increase, where it is often more difficult to provide the housing as part of the	Demand for housing and general housing need is such that it is imperative that the Council seeks housing delivery from all available potential sources. Policy H2 is clear that where self-contained housing cannot practically be provided	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
scheme (and for which under current policy, onsite affordable housing is not required), and prioritise housing / affordable housing delivery on schemes with an uplift of over 2,000 sqm GIA.	on-site or off-site the Council may accept payment in lieu in exceptional circumstances. With regards to affordable housing delivery, the supporting text to Policy H2 states that where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the Council will prioritise delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4. For example, in the past we have accepted proposals which omit the market housing but deliver the entire affordable housing component, and schemes which deliver only affordable housing by switching the tenure of market homes to be delivered elsewhere (not yet built, but benefitting from a live planning permission).	
The Council is aware that the opportunity to find an off-site housing site within the Borough is rare and if one is found, the cost of acquiring the site renders many schemes unviable. Furthermore there is no evidence to support the requirement. Criteria for off-site suitability should be based on appropriateness in order to maximise benefits from the host and donor sites. A financial contribution towards upgrading existing Council estates, bringing back existing empty homes into use and providing for new housing should be the key objective.	We propose to update the supporting text to remove reference to the need to find alternative sites within an 800m straight line distance of the development.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Paragraph 7.38 states that Camden will not seek a contribution of self-contained homes from those elements of a development that are publicly funded or otherwise serve a public purpose, such as hospitals, educational, medical and research institutions. Further clarification is sought as to what example uses are defined as medical and research institutions.	When applying the policy the Council will define medical and research institutions on the basis of the definitions set out in the Use Class Order (1987) and amendments. Any application for development would be assessed on a case by case basis.	No change proposed.
Given recognition of the benefits that can be delivered from the Knowledge Quarter / CAZ uses, it would appear at odds with the general thrust of the London Plan and other Council objectives to 'water down' these benefits with an on-site housing requirement. Recommend that the Council reconsiders the balance of competing land uses and seeks to prioritise more suitable CAZ uses in this part of the borough.	Policy S1 South Camden recognises that the Knowledge Quarter and CAZ should be the main focuses of employment development in Camden. Self-contained housing is however the priority land-use of the Plan, due to the acute need for housing in Camden (particularly affordable housing). The Council is required to deliver against housing targets and given this, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. It is considered that the delivery of additional housing in the areas covered by the policy, including the CAZ, will help provide activity and surveillance when businesses are closed, enliven marginal areas at the periphery of established frontages, and support shops, services and local facilities.	No change proposed.
In the examination of the Westminster City Plan, the inspector recommended	The priority the Council gives to self-contained housing reflects the intense competition	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
deleting draft Policy 10, which required office and hotel developments to provide affordable housing. We suggest that the same conclusion could be found in this instance and that Camden should reconsider the ability for H2 to require the delivery of housing within commercial schemes within the CAZ. It is our contention that Policy H2 does not satisfy the criteria of paragraph 35 of the NPPF (2023) as the approach is not justified or reasonable for commercial schemes in a CAZ context. The requirement for housing from commercially led schemes undermines other policy objectives in the Plan and the London Plan that promote economic development within the Borough. Existing Local Plan Policy H2 poses increasing challenges and jeopardises the feasibility of commercial development in the Borough. Camden is the only London borough still adhering to a mixed-use policy, affecting its commercial appeal and investment attractiveness. Therefore, we propose the deletion of Policy H2.	for the limited supply of land in the borough, both from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Furthermore, due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. We consider the approach in policy H2 is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. It has been established over many years and has operated successfully. Furthermore, the policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies.	
Policy H2 has expanded to include the new sub area of South Camden, covering the CAZ and Knowledge Quarter. Commercial development should take precedence in this area to maintain	Policy S1 South Camden recognises that the Knowledge Quarter and CAZ should be the main focuses of employment development in Camden. Self-contained housing is however the priority land-use of the Plan, due to the acute need	No change proposed. (see also DP067)

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
London's leading innovation districts status.	for housing in Camden (particularly affordable housing). Furthermore, the Council is required to deliver against housing targets and given this it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing.	
The policy approach in H2 is less applicable to a large-scale masterplans than individual sites. At Euston, it is important that Lendlease and the Euston Landowners have the ability to allocate zones of the site purely to commercial uses. Large areas of the Euston masterplan have the potential to be wholly commercial floorspace and it is not necessarily appropriate for all plots to contain a mix of uses. These policies should not be strictly applied to Euston, and should be covered by the Euston Area Plan update in a more bespoke and flexible manner.	We propose to update draft policy H2 to note that the Council will also take into account the vision, objectives and policies of the Euston Area Plan and the particular challenges affecting land directly involved in the construction and/ or redevelopment of the stations at Euston, including the funding requirements associated with rail infrastructure, and the potential for a flexible approach across a portfolio of sites, having regard to the residential and non-residential floorspace involved in demolition related to rail infrastructure and replacement of properties.	Change proposed.
The requirement for commercial schemes to provide housing is increasingly challenging and threatens to undermine deliverability of commercial development, successful town centres and the CAZ. Policy H2 is not considered to meet national policy, and is not fair and reasonably related to scale and kind. The policy should be deleted.	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses, such as hotels, and from alternative forms of housing, such as purpose-built student accommodation. Self-contained housing is however the priority land-use of the Plan, due to the acute need for housing in Camden (particularly affordable housing). The Council is	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	required to deliver against housing targets and, given this, it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. We consider the approach in policy H2 is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. It has been established over many years and has operated successfully. We disagree that H2 does not accord with national policy. Furthermore, the approach has been found sound at previous local plan examinations	
If a form of mixed-use policy is to remain in the Local Plan we consider that it should focus on a financial contribution to be used on other Camden housing developments in the Borough rather than an on-site / off site requirement Contributions could be used to improve existing housing stock as well as delivery of new homes. A sensible approach would be to accept financial contribution for small/ medium sized schemes generating up to 2,000 sqm increase, where it is often more difficult to provide the housing as part of the scheme, and prioritise housing / affordable housing delivery on larger schemes.	Demand for housing and general housing need is such that it is imperative that the Council seeks housing delivery from all available potential sources. Policy H2 is clear that where self-contained housing cannot practically be provided on-site or off-site the Council may accept payment in lieu in exceptional circumstances. With regards to affordable housing delivery, the supporting text to Policy H2 states that where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the Council will prioritise delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4. For example, in the past we have	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Consideration should be given to a housing/ affordable housing credit system to take account of early delivery. A portfolio approach to development could be used to offset planning requirements generated by future schemes, and would deliver better outcomes supporting the delivery of affordable housing in a more appropriate location.	accepted proposals which omit the market housing but deliver the entire affordable housing component, and schemes which deliver only affordable housing by switching the tenure of market homes to be delivered elsewhere (not yet built, but benefitting from a live planning permission). We do not consider that housing / affordable housing credits are a realistic option in Camden, given the high value of land and the lack of any RP portfolio in the borough that could deliver this. It is not considered necessary to change our approach as suggested.	
It is considered that paragraph 7.28 should cross refer to paragraph 7.9 which sets out the other forms of housing that would also be considered to constitute self-contained housing and contribute towards meeting housing targets.	We propose to update the supporting text to add a cross reference to para 7.9.	Change proposed.
The Council is aware that the opportunity to find an off-site housing site within the Borough is rare and if one is found, the cost of acquiring a site renders many schemes unviable. There appears to be no evidence base for the search area or distance. The specific distance requirement is unnecessary and the criteria for an off-site solution should be based on whether the site is appropriate or not in order to maximise the planning	We propose to update the supporting text to remove reference to the need to find alternative sites within an 800m straight line distance of the development.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
benefits of both the host and donor sites.		
Concerned that the policy allows a way out of requirement to provide permanent self-contained homes. The plan allows off-site provision and gives a lot of flexibility to vary the proportion of market and affordable housing, and to vary the split between low-cost rented and intermediate affordable.	H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision.	No change proposed.
The Council should enshrine a sufficiently robust, transparent calculation (para 7.48) for off-site provision and payments in lieu to ensure that the borough is not out-negotiated by developers and that Camden's communities are provided with the extra housing they desperately need.	As referenced in the supporting text of the Plan, more detailed information regarding the calculation of off-site provision and payments in lieu is provided within the Council's supplementary planning guidance.	No change proposed.
The requirement for commercial schemes to provide housing is increasingly challenging and threatens to undermine deliverability of commercial development, successful town centres and the CAZ. Policy H2 does not meet national policy, does not meet the necessary tests in terms of being fairly and reasonably related in scale and kind to a commercial-led development and should be deleted. Not all sites can feasibly provide residential homes, nor can suitable donor sites be located. This policy therefore has the potential to harmfully stifle development in the Borough which could impact	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses, such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Furthermore, due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. We consider the approach in policy H2 is an effective mechanism for helping to	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
on the local economy's vitality.	maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. It has been established over many years and has operated successfully. The policy also allows for the consideration of the economics and financial viability of the development. Furthermore, the policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies.	
If a form of mixed-use policy is to remain in the Local Plan we consider that it should focus on a financial contribution to be used on other Camden housing developments in the Borough rather than an onsite / off site requirement.	Policy H2 is clear that where self-contained housing cannot practically be provided on-site or off-site the Council may accept payment in lieu in exceptional circumstances. It is considered that the delivery of additional housing in the areas covered by the policy, including the CAZ, will help provide activity and surveillance when businesses are closed, enliven marginal areas at the periphery of established frontages, and support shops, services and local facilities.	No change proposed.
An alternative approach would be to accept financial contribution for small/ medium sized schemes generating up to 2,000 sqm increase, where it is often more difficult to provide the housing as part of the scheme, and prioritise housing / affordable housing delivery on larger schemes.	Demand for housing and general housing need in Camden is such that it is imperative that the Council seeks housing delivery from all available potential sources. Policy H2 is clear that where self-contained housing cannot practically be provided on-site or off-site the Council may	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Consideration should be given to a housing/ affordable housing credit system to take account of early delivery. A portfolio approach to development could be used to offset planning requirements generated by future schemes, and would deliver better outcomes supporting the delivery of affordable housing in a more appropriate location.	accept payment in lieu in exceptional circumstances. With regards to affordable housing delivery, the supporting text to Policy H2 states that where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the Council will prioritise delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4. For example, in the past we have accepted proposals which omit the market housing but deliver the entire affordable housing component, and schemes which deliver only affordable housing by switching the tenure of market homes to be delivered elsewhere (not yet built, but benefitting from a live planning permission). The Council's approach to the delivery of affordable housing is well established and considered to work effectively. We do not consider that housing / affordable housing credits are a realistic option in Camden, given the high value of land and the lack of any RP portfolio in the borough that could deliver this.	
Paragraph 7.28 should cross refer to paragraph 7.9 which sets out the other forms of housing that would also be considered to constitute self-contained housing and contribute towards meeting housing targets.	We propose to update the supporting text to add a cross reference to para 7.9.	Change proposed.
The Council is aware that the opportunity to find an off-site	We propose to update the supporting text to remove	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
housing site within the Borough is rare and if one is found, the cost of acquiring the site renders many schemes unviable. There appears to be no evidence base for the search area. The specific distance requirement is unnecessary and the criteria for an off site solution should be based on whether the site is appropriate or not in order to maximise the planning benefits of both the host and donor sites.	reference to the need to find alternative sites within an 800m straight line distance of the development.	
Strongly support for objectives of policy S1 Parts I and J, but question how the impact of policy H2 on the success of these objectives for the Knowledge Quarter has been considered and assessed – especially if half the additional floorspace on all sites in the Knowledge Quarter is expected to come forward as housing. London Plan policy SD5 is clear that new residential development should not compromise the strategic functions of the CAZ and that offices and other strategic CAZ functions are to be given greater weight relative to new residential development.	Policy S1 South Camden recognises that the Knowledge Quarter and CAZ should be the main focuses of employment development in Camden. Self-contained housing is, however, the priority land-use of the Plan, due to the acute need for housing in Camden (particularly affordable housing). The Council is required to deliver against housing targets Test and given this it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The Knowledge Quarter is not acknowledged under Part C or in any other policy in the Draft Plan, even though policy S1 identifies it alongside the CAZ as the main focus for employment development in Camden. consider that specific recognition of the Knowledge Quarter should be included under part C of the policy in an additional criterion.	Policy S1 and Policy IE1 recognise the importance of and seek to support the Knowledge Quarter in Camden. Furthermore a number of sites are allocated to deliver research and development uses, which will also help to sustain and support the Knowledge Quarter. The supporting text to Policy H2 acknowledges that in some areas, there may be local priorities to be balanced against the priority given to housing, particularly in the Central Activities Zone (CAZ). It goes on to state that the Council also supports the institutions and activities that comprise the Knowledge Quarter in the general area of King's Cross and Euston, such as the Wellcome Institute and the British Library, and their requirements may be foremost in particular locations. No additional wording is therefore considered necessary.	No change proposed.
Recognise the strong focus on delivering self-contained homes, but concerned that requirements to deliver housing from non-residential schemes will undermine economic development objectives within South Camden, particularly the CAZ. The primary concern that the policy discourages developers from undertaking minor uplifts in commercial	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
space above 200sqm due to the requirement triggers. Developers are incentivised to simply refurbish a building or not to maximise development opportunities. Other central London boroughs have removed the mixed-use policies from their newly adopted plans meaning LBC is now the only London Borough still proposing a mixed-use policy. Fear policy H2 will discourage investment in commercial development within the Borough compared to other Central London Boroughs and therefore propose that it is deleted.	it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies.	
Acknowledgement Camden's priority for delivery of self-contained homes, but requiring housing from commercial led schemes undermines other policy objectives in the Plan and the London Plan. Adopted Local Plan policy H2 is increasingly challenging and threatens to undermine deliverability of commercial development in the KQ. Camden is the only London borough which still has a mixed use policy which impacts competitiveness when compared to other parts of central London. Requiring commercial development to contribute to the supply of housing is not an efficient or effective means of delivering housing and is	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
inconsistent with the London Plan. Policy H2 should therefore be deleted, and any form of mixed-use policy should apply in the Knowledge Quarter.	supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. The policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies.	
If a mixed use policy remains in the local plan and apply to the Knowledge Quarter, then it should focus on a financial contribution to benefit other Camden-led housing developments in the borough as opposed to on/off-site provision. This approach would prioritise economic growth and be consistent with policy DS1.	Policy H2 is clear that where self-contained housing cannot practically be provided on-site or off-site the Council may accept payment in lieu in exceptional circumstances. It is considered that the delivery of additional housing in the areas covered by the policy, including the CAZ, will help provide activity and surveillance when businesses are closed, enliven marginal areas at the periphery of established frontages, and support shops, services and local facilities.	No change proposed.
Where housing is required it would be helpful to have clarification that the Council will prioritise the delivery of affordable over market housing. The Council is aware of limited availability and difficulty in securing sites within the KQ which may render schemes unviable. Off-site provision should be based on sites being appropriate, to maximise the planning benefits of the application and donor site(s), rather than proximity.	Demand for housing and general housing need is such that it is imperative that the Council seeks housing delivery from all available potential sources. Policy H2 is clear that where self-contained housing cannot practically be provided on-site or off-site the Council may accept payment in lieu in exceptional circumstances. With regards to affordable housing delivery, the supporting text to Policy H2 states that where it is not possible to provide the full self-contained housing contribution sought by Policy H2, the	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	Council will prioritise delivery of affordable housing, having regard to the sub-division of the overall housing target in accordance with Policy H4. For example, in the past we have accepted proposals which omit the market housing but deliver the entire affordable housing component, and schemes which deliver only affordable housing by switching the tenure of market homes to be delivered elsewhere (not yet built, but benefitting from a live planning permission).	
The acute housing need and housing being Camden's priority land use is recognised. However, the Employment Land Review correctly identifies that, whilst there is some uncertainty about future office usage patterns given the evolving position on hybrid working, there is a demonstrable need for new and refurbished stock to respond to tenant demands for quality. Implementation of the adopted policy H2 does, and draft policy would, undermine the objective need for new and refurbished offices. Seeking residential space constrains the quantum and quality of office provision in the CAZ. Often this results in sub-optimal housing. Draft policy H2 should be reconsidered. A better option would be to take a spatial approach and identify areas / sites for release of dated office stock for residential use and	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. H2 has been established over many years and has operated successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. Furthermore, the policy also helps to protect and enhance the borough's well-established	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
encourage office renewal and retrofit elsewhere.	mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies. Policy IE2 offices supports the conversion of offices to housing subject to the criteria set out in the Policy.	
Much greater flexibility is needed for retrofit schemes due to the practicalities of integrating housing into existing buildings and fire safety regulatory constraints.	Policies CC2, CC5 and CC6 in the climate change chapter set out the Council's approach to the retention and retrofit of existing buildings.	No change proposed.
The Inspector's Report into the Westminster City Plan questions both the appropriateness and lawfulness of the mixed use policy approach. Camden remain the only London Borough to adopt, and continue to propose, a mixed-use policy and in light of the above considerations we urge LBC to reconsider the approach taken.	We consider that the approach set out in Policy H2 is appropriate given the acute need for housing in Camden.	No change proposed.
Developers should reimburse the Council's expense for carrying out independent verification, rather than expecting developers to fund verification. A person or company being paid directly by the developer is put in a difficult position, and we have yet to see a report that does not reflect what the developer wants.	The approach taken is standard practice and is successfully operated currently. No change to the plan is considered necessary.	No change proposed.
Suggested additional wording for paragraph 7.38, which incorporates 'ancillary office space associated with educational institutions' into the list of public buildings / facilities.	No change is considered necessary, as ancillary space associated with a publicly funded educational institution, would be considered part of the overarching use, and would therefore be exempt from H2.	No change proposed.

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	Furthermore the supporting text to H2 states that we will not seek a housing contribution from development of non-residential floorspace secured for occupation by a Higher Education institution which is supported by the Office for Students, and thereby serves a public purpose. In addition, where development is proposed by a Higher Education institution supported by the Office for Students, as an alternative to seeking permanent self-contained housing, the Council may support a mixed-use development including student housing (known as purpose-built student accommodation) that serves the same institution, subject to the student accommodation satisfying the requirements of Policy H9.	
The Council's aspiration to prioritise housing as a land use in the borough is supported in principle. Concerned that rigid application of policy H2 may render schemes unviable. Sites are challenging to deliver due to a combination of issues associated with infrastructure delivery challenges and lack of funding available to undertake necessary public transport works.	The priority the Council gives to self-contained housing reflects the intense competition for the limited supply of land in the borough, both from non-housing uses such as hotels, and from alternative forms of housing such as purpose-built student accommodation. Due to the acute need for housing in Camden (particularly affordable housing) and the need for the Council to deliver against housing targets it is considered justified and necessary for the Council to take every available opportunity to deliver additional self-contained housing. H2 has been established over many years and has operated	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	successfully. We consider that it is an effective mechanism for helping to maximise housing supply to meet the need set out in H1, which in turn also helps to maximise affordable housing provision. Furthermore, the policy also helps to protect and enhance the borough's well-established mixed-use character, which in turn should help to sustain the Central Activities Zone and key Town Centres where the policy applies.	
To require provision towards overall and affordable housing off-site from commercial-led mixed-use schemes would render such schemes unviable and undeliverable, increasing the infrastructure funding deficit further on these key sites. Greater and more explicit flexibility is sought on this particular policy at Camden Town and Pentonville Road, which should be made clear in the site allocations.	The policies in the draft Local Plan were subject to viability testing. The viability study concluded that "Policy H2 identifies that the Council will have consideration for the economics and financial viability of the development, including any particular costs associated with it and having regard to any distinctive viability characteristics of particular sectors when determining whether developments should deliver self-contained housing. In light of the results of our testing, we consider that that the Council's proposed draft Policy H2 is reasonably applied and suitably flexible given the high priority to deliver housing and particular need for affordable housing across the Borough, whist ensuring that development can come forward during the life of the plan." Given this, no change is considered necessary.	No change proposed.
Pleased to see that the target would not apply to developments which are	Support welcomed. We propose to update the supporting text to H2 to state	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
publicly funded or otherwise serve a public purpose provided that the public purpose is secured for a reasonable period. A site such as the British Museum would be too constrained to provide space for housing uses and these would unlikely be compatible with the BM use. Request that paragraph 7.38 be expanded to also include specific reference to 'cultural institutions.'	that "We will not seek a contribution from those elements of a development that are publicly funded or otherwise serve an acknowledged public purpose, such as hospitals, museums, educational, medical and research institutions, and transport infrastructure and facilities."	

H3 - Protecting Existing Homes

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Broadly welcome policy H3 but H3 Part D (i), which allows single units to be consolidated into larger houses, threatening the survival of the most affordable market units, should be abandoned.	Policy H3 seeks to resist development that would result in the net loss of homes. However, the Council also recognises that there are situations where the loss of individual homes may be justified, as identified in H3. The net loss of one home is considered to be acceptable when two dwellings are being amalgamated into a single dwelling. Such developments can help families to deal with overcrowding, to grow without moving home, or to care for an elderly relative. Furthermore, within a block of flats or apartments, such a change may not constitute development.	No change proposed.
Support for wording at Paragraph 7.65.	Support welcomed.	No change proposed.

H4 - Maximising the Supply of Affordable Housing

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Maximising Supply of affordable housing. Affordable is NOT affordable for most people in Camden. Replace with Social housing.	Comment noted. For the purpose of the plan, the meaning of 'affordable housing' is outlined in paragraph 7.78 – 7.86.	No change proposed.
How will the timing of the building of off-site provision be monitored? There's a risk that the developer won't get on with it unless there is a strict timeframe, with financial penalties for late building.	Chapter 15 of the draft plan sets out the Council's approach to delivery and monitoring. The Council will seek to use planning obligations to ensure all parts of development are delivered as expected.	No change proposed.
Support for the draft local plan policy regarding build to rent and that affordable housing within BTR schemes should generally be provided on site, but also allowing for alternative scenarios. The next version of the Plan should include reference within Policy H4 to affordable private rent. This will ensure consistency with the London Plan, NPPF and NPPG.	Support welcomed. The Policy sets out how we will seek affordable housing from build to rent housing and large scale purpose built shared living developments. The meaning of affordable housing is set out in the supporting text at paragraphs 7.78 – 7.86. Private rented products aren't considered affordable in Camden. Given this no change is proposed.	No change proposed.
Welcome the policy on affordable housing. In particular support the suggestion that intermediate housing may be prioritised for key workers, such as NHS staff. There is, however, a threat it will not be delivered effectively as the policy does not include measurable targets or monitoring. It is also suggested that strategic sites should be required to contain a proportion of key	Support welcomed. The delivery of the objectives set out in the Local Plan will be monitored through the Council's Authority Monitoring Report. This will include a number of updated indicators to monitor the delivery of the policies set out in the Local Plan. It is not considered practical or appropriate to allocate sites to deliver key worker housing. Sites are allocated in the Plan to support the provision of new	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
worker homes and specific sites should be earmarked for key workers.	homes, of which a proportion would be affordable. Where intermediate housing is proposed in some cases, occupation may be prioritised or limited to key workers, such as health service staff, teachers and workers in emergency services. However this is not a matter that can be controlled by the Local Plan.	
Welcome policy H4.	Support welcomed.	No change proposed.
Welcome acknowledgement in the policy H4 that there is a need for intermediate housing for key workers. Requested that wording is expanded to also acknowledge the need for affordable rent products for key workers. The Council should consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services.	Comments noted. Affordable housing is provided to households whose needs are not met by the market. The London Plan supports two broad categories of affordable housing, low-cost rented housing and intermediate housing. Key workers can access affordable rent products, however this isn't a matter that can be controlled through the Local Plan.	No change proposed.
Recommend the Council: engages with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other	Comments noted. The Council will continue to engage with relevant partners. Whilst the local housing needs assessment that supports the	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
relevant Integrated Care System (ICS) partners - ensures local need for affordable housing for NHS staff is factored into housing needs assessments, and other relevant local plan evidence studies. consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.	Local Plan didn't specifically assess the need for key worker housing, as this isn't a requirement of the NPPF, the need for key worker housing would be identified as part of our overall housing need. Sites are allocated in the Plan to support the provision of new homes, of which a proportion would be affordable. Where intermediate housing is proposed in some cases, occupation may be prioritised or limited to key workers, such as health service staff, teachers and workers in emergency services. However this is not a matter that can be controlled by the Local Plan.	
Consideration should be given to a housing / affordable housing credit system to encourage early delivery of (affordable) housing.	The Council's approach to the delivery of affordable housing is well established and considered to work effectively. We do not consider that housing / affordable housing credits are a realistic option in Camden, given the high value of land and the lack of any RP portfolio in the borough that could deliver this. No change to policy H4 is considered necessary.	No change proposed.
Reference to co-living would align with the London Plan and therefore should be included.	The Council's approach to Large scale Purpose Built Shared Living (co-living) is set out in Policy H10 Housing with Shared Facilities.	No change proposed.
General support for paragraph 7.139 – 7.141.	Support welcomed.	No change proposed.
Policy H4 should be amended to include additional flexibility and allow for consideration of alternative housing products which meet an identified need, e.g. co-living,	Chapter 7 sets out the Council's overall approach to meeting housing needs. Policy H4 is specifically related to maximising the supply of affordable housing and sets out the Council's approach to securing affordable	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
specialist housing and student accommodation.	housing from build to rent, purpose built student accommodation and large scale purpose built shared living schemes. Paragraphs 7.78 – 7.86 of the supporting text set out further information on the types of affordable housing products we seek to secure in Camden. The Council's approach to the delivery of specific housing products is set out in more detail in Policies H6 (Housing Choice and Mix), H8 (Housing for older people, and people with care and support requirements), H9 (Student housing) and H10 (Housing with Shared Facilities – this policy also covers co-living).	
Wording should be added to draft policy H4 Part B ii), for consistency with the London Plan and Camden's Housing CPG, that the Council will consider assessments based on habitable rooms in relation to strategic developments that must be referred to the Mayor. Consistency with the	We propose to update H4 to more closely align with the London Plan and state that we will assess the percentage of affordable housing and percentage of each affordable housing type (usually low-cost rented housing and intermediate housing) on the basis of both the proposed housing floorspace and the proposed number of habitable rooms.	Change proposed.
Support the acknowledgement that the Council will expect a viability review in line with the London Plan's viability threshold approach.	Support welcomed	No change proposed.
The section on Build to Rent could potentially help to increase overall housing output in Camden is welcomed and supported. Good quality rented accommodation is an important part of housing stock for a variety of people including essential workers.	Support welcomed	No change proposed.

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It is important that the housing stock across Camden provides a full range of accommodation options including rented, market housing for sale, and new and emerging housing formats.		
Support the flexibility introduced in Draft Policy H4 Part D.	Support welcomed.	No change proposed.
It is noted that Shared Ownership is not accepted by LBC as an appropriate intermediate housing product. This is not considered appropriate as it does not reflect London Plan Policy H6 which includes London Shared Ownership as an acceptable intermediate product. If Shared Ownership could be provided at a level that does meet the London Plan income thresholds, then this should be considered acceptable on a site-by-site basis and made explicit within the Local Plan. This would align with the GLA's approach to grant funding applications, which supports shared ownership. A greater level of flexibility in relation to affordable housing products is likely to improve and increase delivery of affordable housing, particularly when this can be supported by grant funding.	Whilst it is recognised that intermediate housing for shared-ownership, First Homes, and other forms of affordable home ownership can help households into owner occupation, in Camden it is rarely possible for providers to deliver housing of these types that would be affordable for households with incomes close to the Camden median, and highly challenging to deliver schemes that comply with the maximum eligible income and price cap set out in the London Plan and national guidance. Given these constraints, we strongly encourage provision of homes for intermediate rent. Furthermore, the GLA have not raised any concerns in relation to our approach in their response on the draft Local Plan.	No change proposed.
The affordable housing policy is very involved and complex and does not align with the London Plan threshold approach and	We do not consider the affordable housing policy to be overly onerous or complicated.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
national policy to exempt minor developments. The approach will militate against housing delivery generally as it will require housebuilders to enter prolonged discussions with the Council and the GLA about the structure of the affordable housing offer. It will particularly impact on SMEs and small sites. Subjecting housing schemes to such a degree of complexity is not conducive to improving supply. It is not considered that the policy approach set out in the Plan is supported by the viability appraisal of the draft Plan and no conclusive evidence has been provided to demonstrate that all schemes can support 50% affordable housing contributions. Although the approach to affordable housing may well be well established in Camden that does not mean that it is appropriate to continue with its application in the next plan given the Council's ongoing failure to meet its housing target. We recommend that the Council reverts to the London Plan policy including the threshold approach and observe national policy to exempt minor development. The Council should apply also the Vacant Building Credit.	The approach to securing affordable housing seeks to respond to local circumstances, to maximise affordable housing delivery and help meet need. It builds on the approach in the current Local Plan, which was supported by the Inspector at examination. We do however propose to update the policy to ensure that it better aligns with the threshold approach set out in the London Plan. The policy is clear that we will expect a contribution to affordable housing from schemes that provide one or more additional homes and involve a total addition to housing floorspace of 100sqm GIA or more. This threshold excludes any homes or housing floorspace retained or replaced as part of the development. The Council's threshold for seeking contributions to affordable housing, and our approach to contributions from smaller developments, have been devised to minimise the risk of suppressing the delivery of homes, and have operated successfully since adoption of the Camden Local Plan 2017. The viability assessment of the draft Local Plan appraised residential schemes with a range of affordable housing from 0% to 50% to test the ability of development typologies to meet the requirements of draft Policy H4. The study concluded that the approach was reasonable given	

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	that it allows for sufficient flexibility, both in terms of tenure mix and overall quantum, to enable schemes to come forward with the maximum viable package of affordable housing. The Study goes on to say that setting a lower proportion of affordable housing would likely result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so. With regards to the introduction of a vacant building credit, the vast majority of development sites in Camden are brownfield sites, most of which have existing buildings on them. Wider application of the VBC could unnecessarily and significantly reduce our ability to meet London's affordable housing need and the VBC is unlikely to incentivise more sites to come forward for redevelopment. Given the above, we do not it necessary to change the approach in the Plan.	
Noting sections explaining the Council's approach to viability and the flexible application of policies in the plan. The Council's pragmatic approach is appreciated, however there is concern that if policies are so numerous and onerous to the extent that every applicant is forced into negotiations with the Council then housing delivery will continue to falter. The fact that delivery is poor in	Comments noted. We do not consider that the policies in the Plan are overly onerous or complicated. We also resist the notion that the Local Plan will impact on the delivery of new homes in Camden. We consider that the current Local Plan is operating effectively and continues to deliver the Council's priorities, one of which is that everyone should have a place they call home.	No change proposed.

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Camden at the moment suggests that the current local plan has become non-implementable.	Furthermore, through the new Local Plan we have sought to include a number of measures aimed at maximising housing supply in Camden.	
Paragraph 7.105: seeking affordable housing contribution 'in lieu' from minor development should be deleted.	We recognise that the NPPF indicates that provision of affordable housing should only be sought from major development involving housing, and consequently our approach to seeking affordable housing from smaller developments represents a local departure from national policy in some cases. However it should be noted that this approach was supported by the Inspector examining the current Local Plan, in light of Camden's particular local circumstances. Recognising this departure, we provide flexibility for the smallest developments to provide the affordable housing contribution in the form of a payment-in-lieu. We consider that this approach is appropriate given the need for affordable housing in Camden.	No change proposed.
Although the Mayor maintains that shared ownership is not appropriate where unrestricted market values of a home exceed £600,000, national policy encourages the supply of affordable home ownership products equivalent to 10 per cent of the total number of homes. Recommend that the Council amends the draft policy, or deletes paragraph 7.82, so that shared ownership products could be	The supporting text to Policy H4 acknowledges that whilst intermediate housing for shared-ownership, First Homes, and other forms of affordable home ownership can help households into owner occupation, in Camden it is rarely possible for providers to deliver housing of these types that would be affordable for households with incomes close to the Camden median, and highly challenging to deliver schemes that comply with the maximum eligible income and price cap set out in the London Plan and	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
supported as part of the affordable housing element.	national guidance. Given these constraints, we will continue to strongly encourage provision of homes for intermediate rent.	
Query whether the negotiation of affordable homes based on floorspace of 100m2 GIA includes buildings over 18m which require two stairs.	Policy H4 sets out the Council's approach to seeking affordable housing. If a development was over 18m in height it is likely that this would be a major application and the policy would apply.	No change proposed.
It is not clear if negotiating for affordable homes provision based on habitable rooms incentivises 1bed and 2bed homes. Camden could calculate the number of large homes they require and provide a habitable room figure for developers need to aim for. Calculating based on GIA seem quite convoluted. Habitable rooms are commonly used in many London boroughs.	The Council has been assessing the percentage of affordable housing in housing developments on the basis of floorspace since the adoption of the Camden Core Strategy and Camden Development Policies in 2010. Our previous experience of assessment based on the number of units indicated that it encouraged developers to deliver the smallest possible affordable units in order to minimise their impact on the development's financial value, rather than delivering affordable homes of the size most needed. When considering the proportion of affordable housing proposed, and the proportions of different types of affordable housing (usually low-cost rented housing and intermediate housing), the Council will continue to take account of gross internal area (GIA) or net internal area (NIA), depending on the nature of the scheme and the most reasonable measure for comparison. However, in order to better align with the viability threshold approach in the London Plan we propose to also consider habitable rooms alongside floorspace, and accept that habitable rooms may provide a helpful method of	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	comparison in some circumstances.	
The acknowledgment of London Plan policy requirements in relation to for build-to-rent housing, purpose-built student accommodation, and large-scale purpose-built shared living, coupled with the flexibility introduced in this policy, is appreciated. However, the draft Plan does not go far enough in acknowledging co-living as an acceptable housing option. Recognising co-living would align with the London Plan and, therefore, should be explicitly included.	The Council's approach to large scale Purpose Built Shared Living (co-living) is set out in Policy H10 Housing with Shared Facilities.	No change proposed.
Welcome acknowledgment that buy to rent could potentially help to increase overall housing output in Camden is welcomed.	Support welcomed.	No change proposed.
Policy H4 seems to omit reference to the London Plan policy H5 where the threshold approach to applications is set out, and explains how development proposals can be fast tracked if they meet certain affordable housing thresholds. This seems to be an obvious omission in terms of the viability picture within Policy H4.	The policy and the supporting text make reference to the London Plan with regards to early / mid-term / late stage viability reviews. No additional wording is considered necessary.	No change proposed.
Support for approach to consideration of viability regarding affordable housing, including the particular costs associated with the development. With Euston, the requirement to fund the HS2 station and	Support welcomed. Comment noted.	No change proposed.

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connecting tunnels will directly affect the level of affordable housing that can be provided, given the counter effect the delivery of affordable housing will have on the land receipts.		
On split sites (and related sites) the provisions for affordable housing should not be inferior in terms of site and facilities that include areas given over to exterior spaces like gardens, bike/bin stores etc.	The Local Plan is clear that where a site or a group of related sites becomes available for development, the Council will expect proposals to take the form of a comprehensive scheme rather than piecemeal development.	No change proposed.
Policy H4 reflects the Mayor's strategic target that 50% of all housing is to be affordable, which is welcomed.	Support welcomed.	No change proposed
LBC should note that the required level of affordable housing should be based on gross residential development and not on net increases in housing as currently set out in Part B of Policy H2 in the draft Plan. The sliding scale approach is not in line with Policy H5 of the LP2021 which sets out the Threshold Approach to affordable housing contributions. The sliding scale approach to affordable housing in the draft Plan may result in more applications following the Viability Tested Route. On average this route provides less affordable housing. It is also unclear whether the draft Plan takes account of LP2021 Policy H5, in relation to the threshold levels of 50% for affordable	We propose to update Policy H4 to more closely align with the London Plan with regards to the use of habitable rooms, the operation of the sliding scale and its relationship with the London Plan Threshold Approach; and estate regeneration schemes.	Change proposed

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housing on publicly owned sites and designated industrial sites, where there is a net loss of industrial capacity in order to qualify for the Fast Track Route. LBC should consider if there is an opportunity for the proposed sliding scale approach to be combined with the Mayor's Threshold Approach. The policy should also reflect the different threshold levels of affordable housing required to qualify for the Fast Track Approach on different sites as set out in LP2021 Policy H5 Part B. As currently written, the policy could be a potential General Conformity issue with the LP2021.		
Support policy H4.	Support welcomed.	No change proposed.
Support the aims of policy H4 and specifically Part E and Part D. Viability reviews, reviews should be considered on a case-by-case basis to ensure that these do not stifle development as there are circumstances where it is not appropriate to apply these.	Support welcomed. We consider that the policy is worded sufficiently flexibly to allow for appropriate consideration of financial viability.	No change proposed.
Places for London has an agreement with the Mayor to take a portfolio approach, which provides the flexibility for more complex sites to come forward where they would be unviable providing the full 50% affordable housing requirement, whilst still providing a high level of	Comment noted. We do not consider it necessary or appropriate to refer to the agreement that Places for London has with the Mayor in the Local Plan.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
affordable housing across all TfL landholdings. Additional text is required to ensure that this is reflected in the wording of the draft New Camden Local Plan Policy H4.		

H5 - Protecting and Improving Affordable Housing

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcomed the policy aims to improve the existing stock of affordable housing and that the policy text makes specific reference to the needs of health service workers for self-contained accommodation and aims to ensure that existing occupiers of a redeveloped site will be rehoused. However, it is considered that the policy text could be altered to ensure that the existing key workers are given first refusal on the new accommodation to allow them to reside in the same area.	Support welcomed. Draft local plan paragraph 7.126 notes where existing housing is for key workers, redevelopment should provide for the same group of occupiers unless their needs have been met elsewhere.	No change proposed.
Welcome this policy including 7.121, 'key-worker accommodation, such as nurses' homes and hostels'.	Support welcomed.	No change proposed.
Welcomes the supporting text to Draft Policy H5 that states where the existing housing is for key workers or provided in connection with a job, redevelopment should provide for the same group of occupiers unless	Support welcomed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
their needs have been met elsewhere, in which case low-cost rented housing and intermediate housing will be sought.		

H6 - Housing Choice and Mix

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
It is welcomed that the policy aims to minimise social polarisation which exacerbates health inequalities. However, consider that there should be more emphasis on creating mixed used developments and integrating different housing types.	Support welcomed. Policy H6 supports a range of housing types. Policy H2 specifically seeks to secure mixed use developments.	No change proposed.
It is welcomed that dwellings for a variety of housing needs are promoted.	Support welcomed.	No change proposed.
Whilst the need to provide opportunities for self-builders is appreciated, it is crucial to acknowledge that this policy may not be suitable for transformative masterplan site allocations, such as the Murphy Site. implementing this policy could impede the Site's intensification for high-density employment uses as mandated by other policy requirements. It is therefore encouraged this policy is applied flexibly and on a site-by-site basis.	We propose to update the policy to state that we will seek the inclusion of provision for particular housing needs, rather than expect. In considering the scale and nature of provision for particular housing needs that would be appropriate, the policy sets out a number of factors the Council will take into account, including - the impact of provision for particular housing needs on the efficiency and overall quantum of development; - the economics and financial viability of the development; and - whether an alternative approach could better meet	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	the objectives of this policy and the Local Plan. We consider this allows for sufficient flexibility in the application of the policy.	
Support flexibility in the application of affordable housing and dwelling size policies for the development of build to rent housing where such housing will help to create mixed, inclusive, and sustainable communities. In the absence of specific policy relating to BtR within the Local Plan, we consider that London Plan H11 (Build to Rent) applies to proposals within the Borough, including the acceptability of Discounted Market Rent as an affordable housing product for BtR schemes.	Support welcomed. The Council's approach to build to rent is covered by Policy H6 and Policy H10 Housing with Shared Facilities.	No change proposed.
Support for paragraphs 7.139 – 7.141 on build to rent.	Support welcomed.	No change proposed.
There is a lack of suitable accommodation for households who cannot afford to buy but do not meet affordable housing criteria. This sector includes many important service providers. It is important that the housing stock across Camden provides a full range of accommodation options including rented, market housing for sale, and new and emerging housing formats. Support flexibility in the application of affordable housing and dwelling size	Support welcomed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
policies for the development of build to rent housing where such housing will help to create mixed, inclusive, and sustainable communities.		
For estate regeneration proposals as described in draft allocations such as C10 and C12, enabling self builds would be extremely challenging given the practical and viability challenges associated with the phased reprovision of affordable homes and the delivery of new homes. The policy should be revised to exclude estate regeneration allocations from this requirement. Indeed, all of Part C could be dis-applied to such projects on the basis that it cross refers to other policies which would need to be considered in any event.	We propose to amend both Juniper Crescent and Gilbey Yard Site Allocations to remove the reference to Policy H6C, to avoid any confusion regarding self-build.	Change proposed.
The aspiration to create mixed, inclusive, sustainable and multi-generational communities by seeking a variety of housing is supported. Welcome for inclusion of Part B ii). Encouraged by reference to considerations of economics and financial viability as this can affect the types of housing proposed.	Support welcomed.	No change proposed.

H7 - Large and Small Homes

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The policy should be strengthened to ensure deliverability. Part E should say 'require' rather than 'expect' converted properties to include at least one 3-bedroom home".	We consider that the policy is worded sufficiently strongly. No change to wording is therefore considered necessary.	No change proposed.
Consider that the provision of studios and 1 beds in the private market tenure should be increased in Table 5 to a medium-high requirement. This would acknowledge that smaller properties should be supported as they offer a more affordable form or housing.	We propose to update the dwelling priorities table for market homes to give greater priority to 1-bedroom homes and medium priority to 2-bedroom homes (but retained high priority for 3-bedroom homes) in line with the findings of the Local Housing Needs Assessment.	Chage proposed
Consider that the provision of studios and 1 beds in the private market tenure should be increased in Table 5 to a medium-high requirement. This would acknowledge that smaller properties should be supported as they offer a more affordable form or housing. Furthermore, it is considered that there should be some acknowledgement within the supporting text that despite the demand for 3-bedroom housing being considered 'high', because of the considerable cost of living in Camden, those looking for this size of unit are	We propose to update the dwelling priorities table for market homes to give greater priority to 1-bedroom homes and medium priority to 2-bedroom homes (but retained high priority for 3-bedroom homes) in line with the findings of the Local Housing Needs Assessment.	Chage proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
often priced out of the market.		
The wording confirms that the Council will apply flexibility around dwelling sizes in order to achieve a rational layout. This is positive as it allows for the flexible application of housing policies and recognises that in certain circumstances, meeting minimum size standards and dwelling mix is not always possible. The policy should however recognise that in certain areas in central London, including Seven Dials, there is limited demand for larger family units. These are difficult to let (due to increase rental levels) and, if let, tend to be to single occupiers that simply seek larger spaces or can afford the additional rent. The Council has recognised this in the past and applied a flexible approach to new residential accommodation. This should be recognised within the supporting text of Policy H7.	We propose to update the dwelling priorities table for market homes to give greater priority to 1-bedroom homes and medium priority to 2-bedroom homes (but retained high priority for 3-bedroom homes) in line with the findings of the Local Housing Needs Assessment. We will continue to apply the policy flexibly where appropriate.	No change proposed
The provision of studios and 1 beds in the private market tenure should be increased to a medium-high requirement. This would provide the acknowledgement that because of their inherent size, studios and 1 beds can, and should, be	We propose to update the dwelling priorities table for market homes to give greater priority to 1-bedroom homes and medium priority to 2-bedroom homes (but retained high priority for 3-bedroom homes) in line with the findings of the Local Housing Needs Assessment.	Chage proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
supported as they usually offer a more affordable form of housing.		
the provision of studios and 1 beds in the private market tenure should be increased to a medium-high requirement. This would provide the acknowledgement that because of their inherent size, studios and 1 beds can, and should, be supported as they usually offer a more affordable form of housing.	We propose to update the dwelling priorities table for market homes to give greater priority to 1-bedroom homes and medium priority to 2-bedroom homes (but retained high priority for 3-bedroom homes) in line with the findings of the Local Housing Needs Assessment.	Chage proposed
The provision of studios and 1 beds in the private market tenure should be increased to a medium-high requirement. This would provide the acknowledgement that because of their inherent size, studios and 1 beds can, and should, be supported as they usually offer a more affordable form of housing. We would also support maximum flexibility omitting reference to the size of units in the private market tenure as it should be for the market to dictate the housing need.	We propose to update the dwelling priorities table for market homes to give greater priority to 1-bedroom homes and medium priority to 2-bedroom homes (but retained high priority for 3-bedroom homes) in line with the findings of the Local Housing Needs Assessment.	Chage proposed
In the case of larger housing units in affordable housing schemes, where there is a high likelihood of these being occupied by families, providing secure outdoor space is critical.	Comment noted. The Plan's approach to outdoor amenity space in residential developments is covered by Policy D3 Design of Housing.	No change proposed.
Recognise the importance of securing homes of different sizes	Comment noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
as set out in policy H7. It is reassuring that the dwelling size priorities table will be applied flexibly where applicants can provide justification. There are viability implications but also constraints which might be individual to a site that come into play when a proposed housing mix is put forward. Therefore, we are of the view that housing mix should be considered on a case-by-case basis.		

H8 - Housing for older people, homeless people and other people with care or support requirements

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Strong support for aims of policy H8, in particular its commitment to encourage adaptations to allow people with support requirements to live independently and remain in their own home where possible. It is highly commended that policy recognises the varied and in depth needs of a number of sub-groups and details their individual requirements. It is however considered, words such as 'encourage' or 'support' are not strong enough to guarantee that the policy is taken seriously enough by developers.	Support welcomed. The Council considers that the policy is worded sufficiently strongly to support the delivery of housing for older people, homeless people and other people with support requirements. No change is therefore considered necessary.	No change proposed.
It is welcomed that the policy suggests that one new extra	Support welcomed. The Plan identifies sites where the	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
care facility with 40-45 homes and 20 new nursing care places is required over the plan period. To enable deliverability it is advised that potential sites are identified at an early stage.	provision of housing for older people would be supported.	
The proposed support for new and replacement mental health facilities and facilities for people with learning disabilities and autism is welcomed and the aspiration for developments to be accessible and self-contained. Sites should be clearly identified to accommodate the new development which would ensure deliverability.	Support welcomed. The Plan identifies sites where the provision of housing for people with care or support requirements would be supported.	No change proposed.
The proposed support for young people up to 25 is welcomed. The proposed detailed needs assessment is considered necessary to fully understand the Council's position and its findings should be taken forward.	Support welcomed.	No change proposed.
It is supported that large development sites could accommodate Council Commissioned housing support through its affordable housing provision and is also supported that there is protection of existing provision and the potential to adapt premises to better serve the needs of the people of Camden.	Support welcomed.	No change proposed.
Support for inclusion of draft policy H8 Part F. However, given London Plan policy H13; it is disappointing that the supporting text to draft Policy H8 only refers to the benefits of providing self-	Support welcomed. The policy supports the development of a variety of specialised housing for older people, homeless people and other people with care or support requirements. No	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
contained Extra Care housing and a focus on retrofitting existing homes to meet the needs of older residents, rather than the provision of specialist forms of care homes in C2 use classes.	additional wording is considered necessary.	
LCR have appointed Knight Frank to undertake analysis of the care home (Use Class C2) demand within the borough in addition to the specific demand for dementia care residences, with a summary of finding provided. It is therefore requested that Policy H8 and the accompanying supporting text recognise the specific demand for purpose-built care homes within the borough in addition to Extra Care housing. Also request that the role care homes play in meeting housing demand within the borough, whilst providing fit-for-purpose facilities for the needs of elderly residents and those with dementia, is appropriately recognised throughout the draft Local Plan.	Draft policy H8 is specifically aimed at housing for older people, homeless people and others with care or support requirements. It is considered that the policy and supporting text sufficiently recognise demand for care homes.	No change proposed
Policy H8 should be amended to make it explicit that affordable housing will not be required from care home development. The following sentence should be included "Affordable housing contributions will not be sought from developments for specialist older persons housing (Class C2) in	The London Plan indicates that affordable housing policies and the viability threshold approach apply to 'specialist older persons housing'. Consequently, when considering proposals for homes of this type, we will seek affordable provision in accordance with the London Plan and Local Plan Policy H4 - Maximising the supply of affordable housing.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
accordance with the NPPF and London Plan".		
Welcome the policy for housing for older people The policy, especially Part E, could be strengthened by referring to London Plan policy H13 and the benchmarks for the supply of homes for older people. The Camden specific benchmark is referred to in paragraph 7.199 but inclusion within the policy would help to support the delivery of older persons housing.	Support welcomed. No additional wording is considered necessary as this issue is covered in the supporting text to the policy.	No change proposed.

H9 – Purpose built student accommodation

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Current growth in student housing demand may not be maintained. For this reason, any student housing should be constructed to building regs standards which are appropriate for long-term, not just student use, to avoid the need for demolition and rebuild.	Comment noted. All new development should be constructed to the appropriate standard set out in the Building Regulations. Policy D1 (Achieving Design Excellence) expects new development to be designed to be flexible and adaptable to meet the needs of future users and occupiers. Policy CC2 in the Local Plan seeks to ensure that buildings are retained rather than demolished.	No change proposed.
Once again Camden is building ugly high rise concrete ridden homes for people who come from far away, don't pay taxes to Camden. Once again Camden is ignoring local residents.	We disagree with this comment. We are required to plan for a supply of student housing to meet the target set out in the London Plan 2021.	No change proposed.
Support a positive draft policy for student housing	Support welcomed. Whilst self contained housing is the	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
developments However, there are several aspects of the draft policy which have the potential to curtail the delivery of Purpose Built Student Accommodation (PBSA). Failure to address this student housing shortage will only contribute to the wider housing shortage, as students will rent non-student accommodation and further restrict rental supply. PBSA should be regarded as complementary to other stock types and a partner to other residential providers, rather than a competitor stock type.	priority land use in the Plan we propose to update policy H1 Part B to include reference to "supporting other forms of permanent housing to meet more specific needs, such as purpose-built student accommodation and housing for people with care or support requirements".	
Question why is there a reference to 200 student homes within policy H9 and the evidence to support this. As the need for student homes will vary each year, and we cannot find justification to explain why there is reference to 200 student homes, this element of Policy H9 should be removed to ensure that the policy is sound. It does not appear to be based on evidence and does not align with the flexible approach advocated by the London Plan.	The student housing target is based on the overall strategic requirement for purpose built student accommodation set out in the London Plan. The calculation of the student housing target is explained in the supporting text to Policy H9.	No change proposed.
To ensure consistency with Policy H15 of the London Plan and remove ambiguity, additional clarification should be added to Part B (v) of Policy H9 to explain that "the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms" should have a nominations agreement in place.	We propose to amend the clause on nominations to ensure it is consistent with the London Plan.	Change proposed.
No explanation is provided as to what would constitute a harmful	We propose to update the policy to remove reference	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
concentration or how purpose-built student homes would harm residential amenity. There is an assumption that student behaviour is a problem for local communities without any evidence presented. Young people should be protected through planning policy. It is of paramount importance that accommodation offers a safe environment for students. Far from being a source of crime, PBSA should help to reduce local crime with enhanced security measures, natural surveillance and activity bringing wider benefits to the neighbouring area. There are numerous appeal decisions which demonstrate that students residing in managed developments will have no greater impact on the amenity of neighbouring residents than conventional homes. There should be no material impact to residential amenity from managed PBSA and a concentration of PBSA should not create concern. Part B (ix) of Policy H9 should therefore be deleted as it is not evidenced nor justified.	to harmful concentrations of student accommodation.	
It is welcomed that there is a specific policy for purpose built student accommodation. Consideration should be given to including noise standards within the policy to ensure that students are afforded sufficient privacy in their individual rooms. We suggest that the potential for including a private space with higher level of sound insulation is provided to allow students to	Support welcomed. Policy A4 Noise and Vibration sets out the Council's approach to managing noise and mitigating its impact. Furthermore the design policies in the Plan set out the Council's approach to the design of new developments. Internal noise insultation would also be a matter that would be	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
feel safe talking about sensitive issues to friends and families, to their doctor or therapist.	controlled by the Building Regulations, which falls outside of planning.	
Regarding paragraph 7.222, strongly consider that in most instances student accommodation should meet minimum building regulations standards which treats the accommodation as hotels Students will occupy their rooms for many weeks at a time and will need extra space for working and for their possessions. In addition, the 5% requirement for rooms to be wheelchair accessible should be exceeded as choice for students is much more limited than for visitor accommodation.	We do not consider that it is appropriate to require student housing to be built to a standard that surpasses current Building Regulations. This would have an impact on development viability and may impact on the delivery of student housing in Camden.	No change proposed.
The majority of developments need to provide financial contributions via S106 agreements, in order to meet the needs of new student residents regarding expansion of health infrastructure. The assumptions of the HUDU planning contributions model can be adapted to reflect the age group of the new residents. Also noting that the student population are likely to have different health needs to the general population.	Comment noted.	No change proposed.
As for other major development student housing should mitigate its impact on health and other infrastructure. The Council should take account of guidance being prepared by the GLA in relation to Purpose Built Student Accommodation.	Comment noted.	No change proposed.
Concerned that this policy will unfairly prevent student housing being delivered on sites allocated for a mix of uses	Self-contained housing is the priority use of the Local Plan reflecting significant housing needs. However,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
which include housing. It is important that specific site allocations incorporate as much flexibility as possible. Where a mix of uses are being encouraged, student housing can provide an important form of housing which is in high demand.	we propose to update the Local Plan to allocate appropriate sites for student use.	
Do not consider it is reasonable to require permanent self-contained housing where existing student housing is proposed to be lost. The uses are not directly comparable, nor justified. Reference to the provision of permanent self-contained housing should therefore be deleted.	Self-contained housing is the priority land-use of the Plan, reflecting the acute need for housing in Camden. It is considered justified and necessary to take every available opportunity to deliver additional self-contained housing.	No change proposed.
Camden is home to many of London's universities. Note para 7.210 recognises the significance and economic contribution of higher education establishments.	Comment noted.	No change proposed.
Commend the Council for recognising that there is a need for PBSA but the 200 bed per annum figure is not high enough. The evidence for the London Plan is not up to date and the Council has not prepared any of its own evidence assessing need. We consider that there will be a substantially higher need. Furthermore, we question whether local demand for Camden should be based on an extrapolation of the percentage of existing students that currently live in Camden. Given the Borough's potential to help address London's student needs and the risk that an annual target comes to be	The student housing target is based on the overall strategic requirement for purpose built student accommodation in London which is set out in the London Plan. The calculation of the student housing target is explained in the supporting text to Policy H9. The review of the London Plan has commenced. This will update the overall strategic requirement figure for London. Once adopted, we will seek to meet Camden's proportion of the new London-wide target.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
perceived as a ceiling, we suggest Policy H9 is amended to remove any reference to local annual targets. Doing so would help make the new Local Plan meeting the NPPF 'positively prepared' test of soundness.		
We agree with the principle of nominations agreement being entered into. The wording of the policy, could, however, be interpreted as there being a requirement for 100% of student beds to be secured through a nominations agreement; or for no nominations agreement where 100% of the student beds are affordable. This is contrary to London Plan Policy H15 and its requirement for a 'majority' (i.e. over 50%) of student beds to be secured through a nominations agreement, and for all affordable beds to be secured through a nominations agreement, inclusive in the over 50% figure. Draft policy H9 should be revised to align with London Plan policy H15 and be legally compliant.	We propose to amend the clause on nominations to ensure it is consistent with the London Plan.	Change proposed
It is difficult to conceive that there would be many situations in London where there would be a 'harmful concentration' of PBSA. There is no evidence that PBSA causes greater noise disturbance than other residential land uses. They would not contribute to overcrowding on public transport more than any other residential or commercial land use. all evidence indicates that students spend significantly within their local area, so	We propose to update the policy to remove reference to harmful concentrations of student accommodation.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
positively supporting local shops and services. Therefore request that any suggestion of PBSA being inherently harmful is removed from the new Local Plan; in order to comply with the NPPF test of being 'justified'.		
Whilst the wording "unless is it shown that the site is no longer developable for self-contained housing" is supported in principle, it lacks clarity. It is important that the policy wording contains some degree of flexibility to substitute forms of alternative housing on allocated sites, as the market and housing formats will continue to evolve over the 15-year lifetime of the plan. Policies need to be able to respond appropriately	Self-contained housing is the priority land-use of the Plan, reflecting the acute need for housing in Camden. It is considered justified and necessary to take every available opportunity to deliver additional self-contained housing. It would be for an applicant to demonstrate that a site was not developable for self-contained housing in accordance with the Plan.	No change proposed.
Support for Policy H9 in supporting the provision of student housing that is managed as a single planning unit with a nominations agreement in place.	Support welcomed.	No change proposed.
High levels of student housing are prevalent across Camden (and London) which are beyond the means of local students and seem to be aimed at international pool of students. Priority should be given to those studying at Camden colleges and institutions rather than a pan London approach.	Comment noted. The policy states that the Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds.	No change proposed.
There would be benefit in restricting occupants of student accommodation to those studying at the nearest college, creating a closer college community, and also better integrating the students into the locality for longer term benefits.	Comment noted. The policy supports the provision of student accommodation to meet local need. We don't consider it appropriate or practical to restrict occupants of student accommodation to those	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	studying at the nearest college.	
Strongly object to prioritising self-contained homes over PBSA. PBSA is recognised as a contributor towards housing supply. Therefore, proposals for PBSA should not be seen as impeding the development of conventional housing, but rather contributing to it. A recent planning appeal decision in Haringey acknowledged that the London PBSA market currently does not come close to providing the amount of accommodation required to house London's students. Local Plan paragraph 7.213 acknowledges that "that the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market. This is further supported by national planning guidance and the London Plan 2021. Inspectors have granted consent for student developments where issues have been raised by the local planning authority in terms of a perceived conflict with the development plan due to the view that the site should deliver conventional housing. It is an accepted principle that the fewer PBSA bedspaces are available, the greater the number of students there are occupying HMO accommodation. Therefore the provision of PBSA bedspaces can reduce the demand for HMO accommodation.	Self-contained housing is the priority land-use of the Plan, reflecting the acute need for housing in Camden. Policy H9 states the Council will seek a supply of student housing to meet or exceed Camden's target of 200 additional places in student housing per year. We propose to update policy H1 Part B to include reference to "supporting other forms of permanent housing to meet more specific needs, such as purpose-built student accommodation and housing for people with care or support requirements". We also propose to update the Local Plan to allocate appropriate sites for student use.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The NPPF highlights the importance of addressing the housing requirements of specific groups. Part B (i) and B (ii) should be removed in their entirety.		
Strongly object to the requirement that PBSA schemes comply with the relevant standards for houses in multiple occupation (HMOs). HMO and PBSA developments are markedly different. Separate established guidance is in place at the regional level in respect of the approach to PBSA and it is argued that there is no policy justification to deviate from this guidance at the Camden local level. It is well established that non-self-contained dwellings such as PBSA and purpose-built shared living should not be subject to minimum space requirements. The policy should be amended to remove any mention of HMO standards and instead state that PBSA schemes should adhere to the established guidance already in place at the regional level in respect of the approach to PBSA.	Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life, and this is as true for students as it is for the wider population. Given this we think that it is appropriate for PBSA schemes to comply with the relevant standards for houses in multiple occupation (HMOs). Furthermore the proposed approach is a continuation of our existing policy approach, which was found sound at the examination into the current local plan.	No change proposed.
There is no tangible evidence to suggest that concentrations of PBSA cause harm to the balance or mix of uses in an area, cause additional pressure on local infrastructure or harm local communities. The assumption is discriminatory and a distorted generalisation. The PBSA market is mature and well-managed. Considerations of over-concentration conflates PBSA development with uncontrolled HMO	We propose to update the policy to remove reference to harmful concentrations of student accommodation.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
accommodation, which is a markedly separate housing product and is entirely unjustified. PBSA is a form of housing, and can in principle contribute to local housing land supply. As such, it is not considered sound to unduly restrict concentrations of this form of housing specifically. No threshold is provided for what will be considered to constitute an over-concentration. It is not possible to define an over-concentration, as shown in various appeal cases. Given the above it is considered entirely unsound to seek to restrict concentrations of PBSA where no evidence is provided to justify the perceived harmful impact this would have. Part B (ix) should be removed in its entirety.		
Object to H9 Part C regarding on-site affordable housing contribution, and potential for provision of conventional affordable housing on-site as an alternative to affordable student accommodation. The option for conventional affordable housing will hinder viability and deliverability of student schemes and should instead follow London Plan policy H16 Part 10 affordable housing contribution requirements. The implications of providing such a contribution at the level currently proposed has not been tested or assessed. The added cost of affordable housing contributions when applied in	The Council considers that designated student housing can help limit pressure on the wider private rented market, but to do so the rooms need to be available at a rate that is competitive with the wider market. To ensure that a proportion of student housing is available at competitive rates, we therefore seek to secure the maximum level of accommodation as affordable student accommodation in accordance with the distinctive London Plan provisions for purpose-built student accommodation, but as an alternative strongly	No change required.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
the same way to PBSA as conventional residential uses is likely to cause viability issues. Increased costs of PBSA development will have negative impacts, such as providers seeking to develop out of borough; fewer bed spaces will be provided in borough; provision will fail to meet increasing demand and lead to increases in HMOs; increased demand for fewer spaces will lead to higher rents and a shortage of affordable student accommodation; deliverable schemes may need to sacrifice communal space or open space in favour of bed-spaces; viability issues with off-site affordable housing may lead to a reduction in open space contributions. A hindrance on the delivery of student housing is equally a hindrance on the delivery of housing as a whole. A continuing undersupply of student accommodation will only place additional pressure on family housing as students will continue to be forced to occupy conventional dwellings. There is an emerging trend across London which prioritises the delivery of conventional affordable housing over affordable student accommodation. Currently, this trend does not line up with the aims of London Plan policy H15. Draft Policy H9 is likely to bolster this trend, resulting in a serious lack of affordable student accommodation being delivered	encourage the contribution of on-site affordable housing in accordance with the guideline mix set out in Policy H4 where feasible, having regard to whether developments are able to include separate blocks and / or stair / lift cores.	

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
6 The requirement for affordable housing from PBSA is ultimately in direct conflict with national policy. There is no national planning policy basis for the provision of affordable housing arising from PBSA developments. The NPPF (2021) clearly states that exemptions to affordable housing should be applied where developments propose specialist accommodation, including PBSA. Part C should be amended to remove the option of on-site affordable housing contribution.		
One of the primary concerns is the potential limitation to Camden's adaptability to changing economic trends. Restricting change of use to permanent housing may limit the variety of services and amenities in specific areas. Allowing for mixed-use developments, including retail and employment spaces, can contribute to a more vibrant and dynamic community. Demand for student housing may fluctuate over time. Requiring the replacement of student housing with other residential units may not align with market demands, and flexibility in land use can better accommodate changing needs. A more balanced approach should be adopted. One-size fits all is not conducive to effective urban planning. Part E should be removed altogether.	Given the potential for pressure on the wider private rented stock, the Council will seek to protect existing student housing, including housing managed by education institutions and independent providers, unless it is replaced or there is no longer a demand for it. Where the loss of student housing is considered appropriate, given the high demand for housing that exists in Camden, and the policy provisions of H3 Protecting Existing Homes, it is considered appropriate and justified to require the provision of permanent housing.	No change proposed.
Welcome the requirement that development will be accessible to public transport and will not	Support welcomed. The additional suggested text is not considered necessary.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
have a detrimental impact on the transport network. Suggest also expecting development to be located in proximity to the cycleway network given students' propensity to cycle which should be fostered through policy.		
Welcome para 7.227. However, recommend that the final sentence is clarified by stating that 'Funding contribution towards public transport and other services may be sought through planning obligations as appropriate where there is deemed to be insufficient capacity: or connectivity.'	Support welcomed. Further details of the Council's approach to securing planning obligations to support transport projects is set out in the transport policies in the Plan and in the Delivery and Monitoring chapter. No additional wording is considered necessary under policy H9.	No change proposed.
Support for the focus on the delivery of PBSA within the borough. We are acutely aware of the lack of supply in PBSA across London when compared to the ever increasing demand. Further provision of PBSA will also assist in supporting students who are seen as an important asset to local communities through the diversity they bring to an area, as well as the economic benefits of supporting local businesses.	Support welcomed.	No change proposed.
The target of 200 additional places in student housing per year is considered a significant underestimate of the amount of additional student housing bedrooms that are required per year to meet existing and future demand. Even just based on one university's shortfall, the figure presented in draft Policy H9 does not come close to meeting the growing demand for PBSA beds in the area.	The 200 places per year is not a cap, but a target, which H9 states that the Council will seek to met or exceed. The student housing target is based on the overall strategic requirement for purpose built student accommodation in London which is set out in the London Plan. The calculation of the target is	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Therefore, we cannot support the target set out in draft Policy H9 and suggest this is revised to promote a more accurate supply need.	explained in the supporting text to Policy H9. The review of the London Plan has commenced. This will update the overall strategic requirement figure for London. Once adopted, we will seek to meet Camden's proportion of the new London-wide target.	
Part iii of draft Policy H9, states that PBSA schemes should comply with relevant standards for HMOs. Although this can be seen as standard practice in the industry when considering future PBSA schemes, it seems unorthodox to enshrine in policy guidance which is not specifically related to the use the policy is written for. We therefore suggest that reference to such guidance is removed from the draft policy, although reference may be given in supporting text to demonstrate the approach Camden would look to assess proposals in the future, however noting the London Plan does not specify the guidance and therefore flexibility can be afforded.	Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life, and this is as true for students as it is for the wider population. Given this we think that it is appropriate for PBSA schemes to comply with the relevant standards for houses in multiple occupation (HMOs). Furthermore the proposed approach is a continuation of our existing policy approach, which was found sound at the examination into the current local plan.	No change proposed.
We suggest that further clarity is provided on the provision of a nominations agreement. This part of the policy should specify a nominations agreement should be provided as per London Plan guidance, otherwise it is not clear on the percentage requirements of allocation to higher educational institutions for PBSA schemes.	We propose to amend the clause on nominations to ensure it is consistent with the London Plan.	Change proposed.
Support, where viable, the promotion of securing the maximum level of affordable student accommodation in the	Support welcomed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
first instance from PBSA schemes.		
Strongly support draft policies in relation to inclusive environments and aspirations for accessibility for all. In addition, it is suggested consideration be given as to the flexibility of the type of accessible rooms that are provided within PBSA schemes, noting that not all disabilities follow the requirements of Part M (i.e. some students need separate bedrooms for carers etc.).	Support welcomed. It is considered that this would be covered by other policies in the Plan, for example SC2 Access for All and D1 Achieving Design Excellence. No additional wording is therefore considered necessary.	No change proposed.
It is suggested to provide specific reference to supporting text paragraph 7.51 (requirements of policy H2 do not apply to PBSA) within policy H9 itself to confirm the policy position.	Policy H2 applies in any part of the borough where non-residential development is proposed. It would not therefore apply to a student housing, unless the development also included non-residential uses. No additional wording is considered necessary.	No change proposed.
Student accommodation should be required to provide live in wardens in each block to ensure student well-being.	As set out in policy H9 Part B xii) student housing applications should be accompanied by a management plan. This allows for the consideration of the need for wardens on a case by case basis.	No change proposed.
It is our experience that student housing can be an effective pathway to delivering on-site C3 affordable housing and provide focussed accommodation to students who otherwise would likely reside in private rented homes. Suggest Policy H9 Part A should be amended as follows: 'The Council will aim to ensure that there is a supply of student housing available at costs to	The Local Plan seeks to ensure a supply a student accommodation to meet the borough's portion of London's overall need. No change to wording is considered necessary.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and across the Capital and Camden's international academic reputation.'		
Amend Part B (ii) as follows: '..will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it is shown that the site is no longer developable for self-contained housing or it can be demonstrated both uses can be brought forward without compromising the delivery and quality of each other. This includes for viability reasons.'	Self-contained housing is the priority land-use of the Plan, reflecting the acute need for housing in Camden. It is considered necessary to protect sites identified for self-contained housing from alternative development. It would be for an applicant to demonstrate that a site was not developable for self-contained housing in accordance with the Plan. No change is considered necessary.	No proposed change.
Amend Policy H9 Part B (iv as follows: 'includes a range of flat layouts or meets demonstrated demand'.	The supporting text to the policy makes it clear that applicants should seek a range of flat layouts in student accommodation wherever practical and appropriate. No change is considered necessary.	No change proposed.
Amend Policy H9 Part B (vi) as follows: 'will be secured for students at the area's recognised higher education institutions, which will generally be those in Camden and adjoining London boroughs that are funded by the Office for Students or serves higher education institutions that are accessible from it'.	Policy H9 Part Bvi seeks to ensure that purpose built student accommodation serves students attending local recognised education institutions. No change is considered necessary.	No change proposed.
Remove Policy H9 Part Bvii in its entirety as it is unable to be quantified.	Part B vii is considered appropriate. Officers making an assessment would consider the Public Transport Accessibility Level	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	(PTAL) rating, the established method for ascertaining accessibility to public transport.	
Suggest a further point is added supporting the provision of onsite C3 affordable housing alongside student accommodation proposals, in lieu of all or a proportion of affordable student accommodation, where a Nominations Agreement is not being secured. This will enable further delivery of affordable homes across the Borough.	Part C of H9 confirms that as an alternative to the maximum level of affordable student accommodation, the Council will strongly encourage the provision of on-site affordable housing. Part Bv confirms a nominations agreement should be in place, or accommodation should be provided which is affordable for the student body as a whole.	No change proposed.

H10 - Housing with Shared Facilities

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support for inclusion of draft policy H10. The emerging Local Plan should take account of and cross-refer to the LPG as a document against which co-living proposals within the borough will be assessed.	We propose to update the policy to clarify the relationship with the London Plan approach for large scale purpose built shared living. We do not consider it necessary to include a cross-reference to the LPG on Large-Scale Purpose-Built Shared Living.	Change proposed.
It is not explicitly clear within Policy H10 that applications for co-living should adhere to Part B, such clarity is only provided within the accompanying text at para. 7.260. This clarity should either be provided within Policy H10 itself, or to avoid any confusion or ambiguity, it may be preferable for the Council to draft a standalone draft policy for co-living which is separate to	We propose to update Policy H10 to clarify the Council's approach to large scale purpose built shared living, often known as compact living or co-living.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
other forms of shared housing (e.g. houses in multiple occupation),		
Can find no justification or evidence to support the approach to excessive concentrations being applied to proposals for co-living. Recommend the deletion of Part B(v) of Policy H10 for co-living schemes, as there is no evidence to support it. If there is evidence of planning harm associated with a concentration of co-living, this needs to be detailed within the policy, including guidance on how to assess it.	We propose to update the policy to remove reference to harmful concentrations of such uses.	Change proposed
The wording "unless is it shown that the site is no longer developable for self-contained housing" is supported in principle, it lacks clarity. In the absence of any further detail on what this means, we would assume that this would relate to viability and market demand. It is important that the policy wording contains some degree of flexibility to substitute forms of alternative housing on allocated sites, as the market and housing formats will continue to evolve over the 15-year lifetime of the plan. Policies need to be able to respond appropriately.	Due to the priority for self-contained housing, it is important to protect sites from alternative development. It would be for an applicant to demonstrate to the Council that self-contained housing could not be developable on a site.	No change proposed.

H11 - Accommodation for Travellers

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Draft local plan policy H11 sets out the need for 16 additional pitches. Site allocations should	Comments noted. We propose to update the Plan to refer to the provisional	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
be used to explore opportunities to meet this need. London Plan 2021 policy H14A sets out that the Council should plan to meet the need and must include 10 year pitch targets.	findings of the emerging Gypsy and Traveller Accommodation Needs Assessment. We also propose to allocate two sites in the Local Plan to help meet the need for Gypsy and Traveller accommodation, and propose to update policy H11 to reflect this.	
Support draft policy H11 Accommodation for Travellers. This is an important opportunity to acknowledge and address needs of Gypsy and Traveller communities in the borough.	Support welcomed.	No change proposed.
Recommend early and effective community engagement, including Gypsy and Traveller residents on existing sites, in housing, and nomadic families stopping in the borough. Also that Gypsy and Traveller residents should be involved in the process to identify sites.	To inform the preparation of the Local Plan the Council commissioned a Gypsy and Traveller Site Identification Study to identify Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers. The Study was published for comment from mid December 2024 to the end of January 2025. As part of this the Council approached London Gypsies and Travellers who undertook engagement with Camden's Gypsy and Traveller community on behalf of the Council. The comments received have helped to inform the approach in the Plan.	No change proposed.
Support for target of 16 pitches by 2031 based on need identified in the 2014 Camden GTANA, noting new data anticipated in 2024 in the London GTANA. The	Support welcomed. We propose to update the Plan to refer to the provisional findings of the emerging Gypsy and Traveller Accommodation Needs	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
government has reverted to the 2012 definition of Gypsies and Travellers used in planning policy, and suggest this should be reflected in the supporting text. Strongly recommend that site allocations are included in the included in the next consultation of the Local Plan to meet the target and support delivery.	Assessment. We also propose to allocate two sites in the Local Plan to help meet the need for Gypsy and Traveller accommodation, and propose to update policy H11 to reflect this.	
Implement the London Plan policy H14 D and E which says boroughs should conduct an audit of existing sites they manage, to identify issues such as overcrowding, disrepair, and plan to address these issues.	The management of existing sites is not a matter for the Local Plan. However, we have shared these comments with colleagues in the Council's Housing team.	No change proposed.
Ensure new accommodation for Romany Gypsy, Traveller and Showmen communities meet high standards (environmental sustainability, energy efficiency, accessibility and decent homes standards).	Draft policy H11 Part D sets out a number of criteria to guide the delivery of Gypsy and Traveller sites, pitches or plots, including; accessibility, connectivity, health and safety, appropriate layouts, good levels of amenity, highest design quality and environmental protection.	No change proposed.

Chapter 8 - Responding to Climate Change

In total **338** representations were made on Chapter 8 – Responding to Climate Change. Of these, **22** representations were received via commonplace and **316** representations were received via email.

Responses were received from the following consultees:

- Argent
- Basement Force Ltd.
- Belsize Parkhill and Elsworthy CAACs
- Bloomsbury Conservation Area Advisory Committee (CAAC)
- British Land
- British Museum
- Camden Green Party

- Dartmouth Park Neighbourhood Forum (DPNF)
- Environment Agency
- Eton CAAC
- Folgate Estates
- General Projects
- Highgate Society
- Hilson Moran
- Home Builders Federation
- Kentish Town Neighbourhood Forum (KTNF)
- Lab Tech
- LB Camden Community Investment Programme (CIP)
- London Property Alliance - Great Portland Estates, Royal London Asset Management
- LS Finchley Road Ltd
- NHS Property Services
- One Housing & Countryside (OH & C)
- Primrose Hill CAAC
- Redington Frognal Neighbourhood Forum
- Regal London
- Royal Mail Group (RMG)
- Royal Veterinary College
- Shaftesbury Capital
- South Hampstead Flood Action Group
- Sport England
- St George West London Ltd
- Tarmac Trading Ltd
- TfL
- The Fitzrovia Partnership
- University College London (UCL)
- Woodland Trust

General Comments

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There should be a specific policy on retrofitting, modelled on Westminster City Council's retrofitting policy.	Policy CC2 in the Draft Local Plan sets out our approach to Repurposing, Refurbishment and Re-use of Existing Buildings and seeks to ensure these are prioritised over demolition. Policy CC5 (Sustainability Improvements to existing	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	buildings) sets out our approach to supporting the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building.	
Embodied energy emissions targets for all new developments will be based on the benchmarks set by the London Energy Transformation Initiative.	Draft Local Plan Policy CC4 Minimising carbon emissions sets out the approach to whole life carbon and embodied carbon.	No change proposed.
Westminster Council are increasing the rate for carbon offset payments. We look forward to seeing a retrofitting policy in the plan.	Draft Local Plan Policy CC6 (Energy use and the generation of renewable energy) seeks to ensure all new buildings are designed and built to be net zero carbon in operation. This includes an offset price which is equal to the amount of renewable energy generation to be achieved on-site. Policy CC5 (Sustainability Improvements to existing buildings) sets out our approach to supporting the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building.	No change proposed.
Welcome the approach taken further emphasising the importance of sustainability in future development, as well as highlighting the climate emergency and ways in which the borough is looking to tackle this issue.	Support welcomed. We propose to add a definition of net zero. Draft policy CC6 Energy reduction new buildings explains how buildings should be net zero in operation.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
It would be beneficial to include a definition for 'Net zero' and more clarity on carbon offsetting.		
Fully recognise the climate emergency and support the overarching aspirations relating to climate change in the Local Plan but consider the policies are too prescriptive and would be more appropriate as part of a new/updated Supplementary Planning Document. The December 2023 Written Ministerial Statement said the government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The approach in the Draft Local Plan does not include the required 'well-reasoned and robustly costed rationale' and is inconsistent with current and planned building regulations.	The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. Also, as the response notes, the Written Ministerial Statement provides for local energy efficiency standards that go beyond current or planned buildings regulation provided these have a well-reasoned and robustly costed rationale. The Plan has been subject to viability testing and climate change policies are supported by evidence. We do however propose to update the policy criteria in CC6 to make it clear that where we seek a payment in lieu, this will be subject to viability.	Change proposed
Expand Policy CC1 xi. to include the need to avoid the incremental impact of loss or reduction of garden space, including paving over individual gardens and erection of "garden rooms", as measures to relieve flood risk and enhance biodiversity.	The importance of gardens and open spaces for drainage and biodiversity is addressed in policy CC11 Sustainable drainage. Policy D4 Extensions and alterations states that the extension is subordinate to the building being extended or altered and will be required to deliver	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	biodiversity enhancements.	
Suggest that either this chapter or Chapter 14 highlights the significant role that decarbonisation of the transport network and mode shift play in reducing the carbon emissions of development.	Paragraph 14.2 in Chapter 14 'Safe, Healthy and Sustainable Transport' recognises the role transport has in reducing carbon emissions.	No change proposed.
Strongly support how this chapter has been set out, comprehensive, legible and supported by ambitious, integrated and viable policies.	Support welcomed.	No change proposed.
Install solar panels on all public buildings.	The installation of solar panels is supported in the plan. New developments will be required to maximise space for solar pv.	No change proposed.
Listed buildings account for a large proportion of Camden's built environment and they are not mentioned. More guidance is needed on appropriate improvements regarding energy use.	Policy CC5 Sustainability Improvements to existing buildings seeks to provide guidance on what measures are available to improve the energy efficiency of existing buildings in Camden. Policy D5 Heritage sets out the Plan's approach to sustainability improvements to heritage assets.	No change proposed.
This is a critical area and Camden Council has done an excellent job in this regard to date. Preference to design in carbon reduction where feasible and affordable.	Support welcomed.	No change proposed.
Camden Council has made excellent progress in responding to Climate	Support welcome.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Change. This must be continued, but it is important to do so with the acceptance of our citizens.		
The need for re-purposing, refurbishment and re-use of existing buildings to meet the Council's sustainability targets is considered often difficult to achieve, particularly when seeking to upgrade historic buildings and existing stock. Further discussion with the Council on retrofit opportunities exist to improve both building and operational energy efficiencies would be welcomed to help inform future policy.	Comment noted.	No change proposed.
Fully support the requirement for all development to minimise the effects of climate change that are financially viable during construction and occupation. The policies are incredibly detailed and would be more appropriate as part of a new/updated Supplementary Planning Document.	Support welcomed. The level of detail in the policies is considered appropriate and necessary to ensure policy aims are achieved across application types. Supplementary Planning Guidance is useful in providing additional detail but it cannot include policy criteria.	No change proposed.
Fully support the requirement for all development to minimise the effects of climate change that are financially viable during construction and occupation. The policies are incredibly detailed and would be more	Support welcomed. The level of detail in the policies is considered appropriate and necessary to ensure policy aims are achieved across application types. Supplementary Planning Guidance is useful in	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
appropriate as part of a new/updated Supplementary Planning Document. The Energy Use Intensity (EUI) policy is inconsistent with the London Plan. The December 2023 Written Ministerial Statement said the government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The approach in the Draft Local Plan does not include the required 'well-reasoned and robustly costed rationale'.	providing additional detail but it cannot include policy criteria. We do not consider the approach to be inconsistent with the London Plan. EUI is a different metric to Part L Building Regulations to ensure we move closer to zero carbon development in operation. EUI reporting is requested by the GLA in Energy Assessment Guidance 2022. The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. Also, as the response notes, the Written Ministerial Statement provides for local energy efficiency standards that go beyond current or planned building regulations provided these have a well-reasoned and robustly costed rationale. The Plan has been subject to viability testing and climate change policies are supported by evidence. We do however propose to update the policy criteria in CC6 to make it clear that where we seek a payment in lieu, this will be subject to viability.	
It is important that the policies set out within this	The Planning and Energy Act 2008 gives provisions	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Chapter take account of the Written Ministerial Statement December 2023 and are also able to react to any forthcoming National Development Management Policies relating to climate change. Paragraphs 8.1 and 8.4 should use consistent terminology re net zero and a carbon neutral borough.	to Local Planning Authorities to set energy targets. Also, as the response notes, the WMS provides for local energy efficiency standards that go beyond current or planned buildings regulation, provided these have a well-reasoned and robustly costed rationale. The Plan has been subject to viability testing and the climate change policies are supported by evidence. We do however propose to update the policy criteria in CC6 to make it clear that where we seek a payment in lieu, this will be subject to viability. Furthermore, we propose to update the opening paragraphs of the chapter to make them clearer and ensure consistent terminology is used throughout.	
Fully support the requirement for all development to minimise the effects of climate change that are financially viable during construction and occupation. The policies are incredibly detailed and would be more appropriate as part of a new/updated Supplementary Planning Document. The Energy Use Intensity (EUI) policy is	Support welcomed. The level of detail in the policies is considered appropriate and necessary to ensure policy aims are achieved across application types. Supplementary Planning Guidance is useful in providing additional detail but it cannot include policy criteria. We do not consider the approach to be	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
inconsistent with the London Plan. The December 2023 Written Ministerial Statement said the government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The approach in the Draft Local Plan does not include the required 'well-reasoned and robustly costed rationale'.	inconsistent with the London Plan. EUI is a different metric to building regulations Part L to ensure we move closer to zero carbon development in operation. EUI reporting is requested by the GLA in Energy Assessment Guidance 2022. The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. Also, as the response notes, the Written Ministerial Statement provides for local energy efficiency standards that go beyond current or planned buildings regulation provided these have a well-reasoned and robustly costed rationale. The Plan has been subject to viability testing and climate change policies are supported by evidence. We do however propose to update the policy criteria in CC6 to make it clear that where we seek a payment in lieu, this will be subject to viability.	
As drafted, we consider the emerging policy to be inconsistent with the London Plan and the Dec 2023 Written Ministerial Statement made on 13 December 2023 which states that '*the Government does not expect plan-makers to set*	We do not consider the approach to be inconsistent with the London Plan. EUI is a different metric to Building Regulations Part L, to ensure we move closer to zero carbon development in operation. EUI reporting is requested	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
local energy efficiency standards for buildings that go beyond current or planned buildings regulations.' As such, the draft Local Plan does not meet the tests of soundness in the NPPF given it is not justified or in accordance with National Policy.	by the GLA in Energy Assessment Guidance 2022. The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. Also, as the response notes, the WMS provides for local energy efficiency standards that go beyond current or planned buildings regulation provided these have a well-reasoned and robustly costed rationale. The Plan has been subject to viability testing and climate change policies are supported by evidence. We do however propose to update the policy criteria in CC6 to make it clear that where we seek a payment in lieu, this will be subject to viability.	
Support the draft Local Plan in respect of solar panels and air source heat pumps. More flexibility is required to enable residents to install solar panels in conservation areas, prioritising the public benefit of tackling the climate emergency.	Support welcomed. Policy CC5 outlines the Council's support for retrofitting measures such as solar panels. In most cases, roof-mounted solar panels on residential properties do not require planning permission, provided they meet certain conditions, as set out in the General Permitted Development Order.	No change proposed.
Support thermal performance for building components.	Support welcomed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Hope to see more consistency in the determination of planning applications. Will officers have training?	Comment noted, however this is not an issue for the Local Plan to address. We have passed your comment onto the relevant Council service.	No change proposed.
Paragraph 8.42 - projection of solar panels on flat roofs is 600mm	Noted. Given that permitted development rights are subject to change it is considered better if this detail is not included within the plan.	No change proposed.

CC1 - Responding to the Climate Emergency

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Climate Change is an existential risk and as such we welcome it as a key policy strand in the Camden Draft Local Plan. To achieve the borough target to be net zero carbon by 2030 will require buildings to be retrofitted and powered from renewable energy Request for Fitzrovia to be designated as a 'Fast Zero' Community, with a set of supporting planning policies to accelerate progress towards Net Zero Carbon in 2030.	The Local Plan seeks to encourage the retrofitting of buildings to improve the energy efficiency of existing buildings throughout the borough. It is not considered necessary to have designations and policies for specific areas.	No change proposed.
We suggest the following amendments to ensure that the policy is as flexible as possible to encourage innovative design and delivery solutions to achieve this important aim: CC1 A i. Supporting the retrofitting of existing buildings to make them	Policy CC1 sets out the overarching strategic policy approach in the climate chapter. Further detail is provided within the corresponding policies. CC1 outlines a policy aim which is to prioritise reuse over demolition, and policy CC2 defines in more	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
more energy efficient and reduce the energy needed to occupy the building where appropriate or applicable ii. Prioritising and enabling the repurposing and re-use of existing buildings over demolition where appropriate or applicable.	detail how this aim is applied and where there may be instances that partial or substantial demolition may be justified.	
We could not find evidence if the approach on prioritising reuse over demolition has been applied to the site allocation capacity studies. If the priority to the repurposing and re-use of existing buildings is applied too strongly to existing buildings on site allocations, there may be issues with the Draft Plan in meeting its development targets. It needs to be made clear how this policy has been applied to the assessment of site allocations and if it hasn't, or there are impacts as a result on development capacity, then a different approach to the site allocations needs to be set out for the policies in this Chapter.	The capacity studies undertaken for the site allocations took into consideration the priority for reuse. Where schemes come forward that propose substantial or full demolition of existing buildings on these sites, applicants will need to comply with the requirements set out in Policy CC2 (Retention of Existing Buildings). If it can be demonstrated to the Council's satisfaction that an existing building cannot be retained and improved upon, and demolition is permitted, then the development capacity of the site will be agreed as part of the planning application process, in accordance with the development plan. 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	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.	
We support point CC1 xi. As drafted, the policy seeks nature enhancement, but does not recognise the active role that nature-based solutions can play. Suggest amending point vii) to read: vii. Being designed to be resilient to climate change and meet the highest standards of sustainable design and construction, maximising the use of nature-based solutions.	We understand the importance of prioritising nature based solutions and this is expressed as 'strengthening nature recovery' in policy CC1.	No change proposed.
Support Policy CC1.	Support welcomed.	No change required.
Support Policy CC1.	Support welcomed.	No change proposed.
Support adaptations and improvements to existing buildings to make them more energy efficient, and that all new buildings are designed and built to be net zero carbon in operation. NHS property could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	Support welcomed. The Local Plan does not set out priorities for spending carbon offset funds.	No change proposed.
The need for a Sustainability Statement for all planning applications is considerably onerous, particularly where small scale changes are proposed, such as shopfront applications or	We propose to amend policy CC1 to make it clear where Sustainability Statements are required. For schemes involving the addition of one or more homes (from new and existing buildings) and	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
change of use applications. This should only be required where substantial refurbishment of existing floorspace, or construction of new floorspace is proposed.	proposals involving 500 square metres or more of additional or re-provided floorspace a Sustainability Statement will be required. For all other schemes this evidence should be provided as part of the Design and Access Statement (unless agreed with the Council that it is not relevant for the development proposal).	
The intricacies of the policies contained in this chapter are excessively detailed. It might be more appropriate for these details to be part of a new or updated Supplementary Planning Document rather than being in the Local Plan.	The detail in the policies are considered to be reasonable. This ensures they can be successfully applied and that there is little ambiguity between application types. Supplementary Planning Guidance is useful in providing additional detail but it cannot include policy criteria.	No change proposed.
Draft Policy CC1 currently applies to all development in Camden. This is incredibly onerous and a threshold should be applied. The words "where relevant" should be added to the policy.	Policy CC1 sets out the overarching strategic policy approach in the climate chapter. Further detail is provided within the corresponding policies, which set out where they will apply. No change to policy CC1 is considered necessary.	No change proposed.
It is not reasonable to require all planning applications to submit a Sustainability Statement.	We propose to amend policy CC1 to make it clear where Sustainability Statements are required. For schemes involving the addition of one or more homes (from new and existing buildings) and proposals involving 500 square metres or more of	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	additional or re-provided floorspace a Sustainability Statement will be required. For all other schemes this evidence should be provided as part of the Design and Access Statement (unless agreed with the Council that it is not relevant for the development proposal).	
This is a strong overarching policy. Recommend tying the relevant policy objectives and actions in implementing the recommendations in The London Climate Resilience Review 2024. Also welcome this policy's inclusion of minimising and avoiding the risk of flooding from all sources and the incorporation of SuDS.	Support welcomed. We have reviewed the recommendations in the London Climate Resilience Review. No change is considered necessary.	No change proposed.
Draft Policy CC1 currently applies to all development in Camden. This is incredibly onerous and a threshold should be applied. The words "where relevant" should be added to the policy.	Policy CC1 sets out the overarching strategic policy approach in the climate chapter. Further detail is provided within the corresponding policies, which set out where they will apply. No change to policy CC1 is considered necessary.	No change proposed.
It is not reasonable to require all planning applications to submit a Sustainability Statement.	We propose to amend policy CC1 to make it clear where Sustainability Statements are required. For schemes involving the addition of one or more homes (from new and existing buildings) and proposals involving 500	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	square metres or more of additional or re-provided floorspace a Sustainability Statement will be required. For all other schemes this evidence should be provided as part of the Design and Access Statement (unless agreed with the Council that it is not relevant for the development proposal).	
We could not find evidence if this approach on prioritising reuse over demolition has been applied to the site allocation capacity studies. If the priority to the repurposing and re-use of existing buildings is applied too strongly to existing buildings on site allocations, there may be issues with the Draft Plan in meeting its development targets. It needs to be made clear how this policy has been applied to the assessment of site allocations and if it hasn't, or there are impacts as a result on development capacity, then a different approach to the site allocations needs to be set out for the policies in this Chapter.	The capacity studies undertaken for the site allocations took into consideration the priority for reuse. Where schemes come forward that propose substantial or full demolition of existing buildings on these sites, applicants will need to comply with the requirements set out in Policy CC2 (Retention of Existing Buildings). If it can be demonstrated to the Council's satisfaction that an existing building cannot be retained and improved upon, and demolition is permitted, then the development capacity of the site will be agreed as part of the planning application process, in accordance with the development plan. 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	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours.	
The policy refers to Net zero in operation – assume this aligns with CRREM/ UKGBC Targets. More clarity if this is for base building or/and tenants.	We propose to update the Plan to provide more clarity on the definition of net zero.	Change proposed
Support retrofitting existing buildings to make them more energy efficient and reduce the energy demand, however, the approach to retrofitting must consider the heritage sensitivities of the particular building and balance the benefit against any harm considered to be caused. Part ii) which prioritises the re-purposing and re-use of buildings over demolition should take a case by case approach to understanding particular constraints and issues for each particular site. Part viii) relating to avoiding reliance on air conditioning is supported in principle but there may be a specific need for air conditioning in institutions like the British Museum which should be acknowledged in the draft policy.	The policies within this chapter seek to provide further guidance and support for retrofitting measures across the borough, taking into consideration national planning policy for heritage assets. Policy CC2 provides detailed policy on how CC1 ii) will be assessed, which is largely a case by case approach. Policy CC8 provides detailed policy on how CC1 viii) will be assessed, taking into account the specific need for cooling.	No change proposed.
Draft Policy CC1 currently applies to all	Policy CC1 sets out the overarching strategic	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
development in Camden. This is incredibly onerous and a threshold should be applied. The words "where relevant" should be added to the policy.	policy approach in the climate chapter. Further detail is provided within the corresponding policies, which set out where they will apply. No change to policy CC1 is considered necessary.	
It is not reasonable to require all planning applications to submit a Sustainability Statement.	We propose to amend policy CC1 to make it clear where Sustainability Statements are required. For schemes involving the addition of one or more homes (from new and existing buildings) and proposals involving 500 square metres or more of additional or re-provided floorspace a Sustainability Statement will be required. For all other schemes this evidence should be provided as part of the Design and Access Statement (unless agreed with the Council that it is not relevant for the development proposal).	Change proposed
it is inevitable that certain development will emit more carbon emissions than they could possibly offset to become net zero. As a result, it is considered requiring all development to be 'net zero carbon' during operation is overly onerous and could stifle the viability/deliverability of new development. Suggest alternative wording 'could require that certain development	It is considered appropriate that all development in Camden should contribute to meeting the borough's net zero target by 2030. Our evidence base 'Delivering net zero' demonstrates that it is feasible for all new development in the borough to meet net zero carbon in operation. Different development types / uses have been considered with varying	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
mitigates or minimises carbon emissions during operation'.	Energy Use Intensity targets.	
Welcome CC1. Suggest that a reference to this chapter is made at the beginning a number of other chapters.	References to the policies in the Climate Change chapter are included in other parts of the plan where necessary. The Plan should be read as a whole and all relevant policies will be applied to when assessing development proposals.	No change proposed.

CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcome Policy CC2.	Support welcomed.	No change proposed.
A retrofit first or only approach is unlikely to be suitable for large strategic sites as it would hinder the ability to fully optimise the Site and meet Local Plan objectives. The policy position must acknowledge that, in certain instances, demolition is the only route to achieve these objectives.	Policy CC2 does not set out a 'retrofit only' approach. Retention is the priority unless evidence demonstrates to the Council's satisfaction that the applicant has explored a range of development options informed by a condition and feasibility assessment, and the proposal constitutes the best use of the site when considered against alternatives, which include retention.	No change proposed.
It would be useful to see more detail on how the council intends to implement Policy CC2 and how it is an upgrade on the 2017 Plan.	Policy CC2 provides additional detail on re-use of buildings compared to the Local Plan 2017, which should aid policy application.	No change proposed.
Consider including a whole-life carbon assessment reference in draft Policy CC2 as a potential point of justification.	Whole life carbon assessment has not been included within this policy as a point of justification as it	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	distracts from the policy's primary principle which is to retain, repurpose, or refurbish. WLC assessment is a useful tool in seeking to ensure carbon emissions of a development are minimised as much as possible once development principles are resolved. No change is therefore considered appropriate.	
In many cases repurposing, refurbishment and re-use of existing buildings, is not viable or practical. Suggest "where feasible, viable and appropriate" is added to CC2 Part A.	The policy provides applicants the opportunity to demonstrate whether a building is able to be retained or not through submission of a condition and feasibility assessment and consideration of development options.	No change proposed.
Delete the word "fully" in CC2 Part C	It is necessary to ensure that feasible development options have been fully explored. Propose to update policy wording to "developer has comprehensively explored a range of feasible alternative development options."	Change proposed
Delete "before progressing the design of any scheme" In CC2 Part D. It is unreasonable and unrealistic to expect a project to pause until this has been established.	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
CC2 Part E part ii needs to be removed in its entirety. The 'best use' of the site will be assessed against relevant policy, applicable site allocations and current market demand. It is not suitable for it to be included in	The reference to best use of the site is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Policy CC2 and therefore should be removed.	We propose to update the supporting test to clarify what is meant by 'best use of the site'.	
Concerned how this policy is applied to the site allocations. Has best use of the site already been determined through the allocated uses? The requirement of a feasibility assessment on allocated sites could lead to significant delay. This should be considered at the plan making stage. The policy and supporting text should be clearer and consideration of viability should be included.	The reference to best use of the site is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity. It is considered that viability may be a consideration in whether a development option is feasible or not. We propose to update the supporting test to clarify what is meant by 'best use of the site'.	Change proposed.
Support focus on the reuse of existing buildings. The carbon footprint of new buildings must be taken into consideration. Historic buildings should always be protected to keep the mix of architecture and historic relevance to Camden.	Support welcomed.	No change proposed.
Request for the Council to encourage the use of recyclable containers and packaging, particularly smaller shops and takeaways.	The Local Plan cannot address matters that do not require submission of a planning application, such as packaging and containers used in shops and food outlets.	No change proposed.
The evidence from cases such as Museum Street is that the Council will continue to allow buildings to be demolished and replaced. Embodied carbon of existing buildings needs to be given more weight.	The draft Local Plan includes policy promoting the reuse of existing buildings and considers embodied carbon.	No change proposed.
Support policy on repurposing and refurbishment. Your local development plan would be	Support welcomed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
great if you would only put into practice what you preach.		
The Royal Veterinary College's Camden campus includes buildings that require either major interventions or demolition. It is understood that any future demolition proposals must be acceptable in light of policy CC2 and demonstrate that the proposal constitutes the best use of the site when considered against alternative options.	Comment noted.	No change proposed.
CC2 Part B should only apply where extensive or substantial demolition is proposed. Remove reference to exploring the 'best use of the site'. The application of Part C should be limited to cases involving extensive or substantial demolition.	We propose to update the Plan to provide further clarity on what constitutes substantial demolition and what is meant by 'best use of the site'.	Change proposed
CC2 Part D is inappropriate to outline that discussions should occur before advancing the design.	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
CC2 Part E ii should be deleted. Identifying the optimal use for the site involves supporting other policy objectives in the Plan and ensuring the delivery of the greatest public benefits for Camden, which may not always align with the lowest carbon option	The reference to best use of the site is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity. We propose to update the supporting test to clarify what is meant by 'best use of the site'.	Change proposed
Amend CC2 to ensure applicants demonstrate the exploration of	It is considered that policies CC2 and CC3 (referenced in	No changes proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
reusing materials onsite but also consider options for reusing materials on other local sites or supplying them to be used elsewhere.	CC2) address reuse onsite and offsite.	
More information needed on what is required in the condition and feasibility assessment.	This detail is contained in Camden Planning Guidance 'Energy efficiency and adaptation'. It is proposed that a cross reference to this is added.	Change proposed
It is too onerous to require submission of detailed drawings for alternative development options.	The submission of drawings to demonstrate what development options have been considered is important to allow the Council to determine whether alternative options have been fully explored.	No change proposed.
Suggestion to remove "before progressing the design of any scheme."	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
Definition of the scale of demolition is required.	We propose to update the Plan to set out that substantial demolition is where 50% or more of the building's floorspace would be removed.	Change proposed
Suggest inclusion of 'where feasible' paragraph 8.16. "Where it is demonstrated to the Council's satisfaction that repurposing, refurbishment, or reuse options are not feasible, we will expect the replacement building to meet, or exceed the targets set out in this plan, where feasible, for:"	We propose to remove this paragraph from the supporting text.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
It is not clear whether this policy applies to all applications or major applications and even where demolition is not proposed	We propose to update the supporting text to provide further information on this and clarify that substantial demolition is where 50% or more of the building's floorspace would be removed.	Change proposed
Part B should only apply where extensive or substantial demolition is proposed. Reference to exploring the 'best use of the site' should be removed.	We propose to update the supporting text to provide further information on this and clarify that substantial demolition is where 50% or more of the building's floorspace would be removed. We also propose to update the Plan to clarify the meaning of 'best use of the site' - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	Change proposed
Suggestion to include a similar approach to City of London's guidance on carbon optioneering.	The policy seeks to determine whether a building can be reused in principle and considering the best use of the site. Whole Life Carbon assessment is a useful tool in seeking to ensure carbon emissions of a development are minimised as much as possible once development principles are resolved – not as a means of justifying whether a building can be retained or not.	No change proposed.
Part C should only apply where substantial demolition is	We propose to update the supporting text to provide further information on this	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
proposed. A definition of substantial demolition is needed.	and clarify that substantial demolition is where 50% or more of the building's floorspace would be removed.	
Do not consider it appropriate for the Policy to specify that these discussions on feasibility should take place before progressing the design of any scheme.	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
Part E needs to include a definition of 'partial or substantial demolition'	We propose to update the supporting text to provide further information on this and clarify that substantial demolition is where 50% or more of the building's floorspace would be removed.	Change proposed
Part E ii should be deleted as the best use of a site is assessed against land use policies in the Plan.	We propose to update the Plan to clarify the meaning of 'best use of the site' - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	Change proposed
Amend CC2 to ensure applicants demonstrate the exploration of reusing materials onsite but also consider options for reusing materials on other local sites or supplying them to be used elsewhere.	It is considered that policies CC2 and CC3 (referenced in CC2) address reuse onsite and offsite.	No changes proposed.
More information needed on what is required in the condition and feasibility assessment.	This detail is contained in Camden Planning Guidance 'Energy efficiency and adaptation'. It is proposed that a cross reference to this is added.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Too onerous to require submission of detailed drawings for alternative options.	The submission of drawings to demonstrate what development options have been considered is important to allow the Council to determine whether alternative options have been fully explored.	No change proposed.
Suggestion to remove "before progressing the design of any scheme."	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
Definition of the scale of demolition is required.	We propose to update the supporting text to provide further information on this and clarify that substantial demolition is where 50% or more of the building's floorspace would be removed.	Change proposed
Suggest inclusion of 'where feasible' paragraph 8.16. "Where it is demonstrated to the Council's satisfaction that repurposing, refurbishment, or reuse options are not feasible, we will expect the replacement building to meet, or exceed the targets set out in this plan, where feasible, for:"	We propose to remove this paragraph from the supporting text.	Change proposed
The policy must acknowledge that, in certain instances, demolition is the only route to achieve plan objectives for strategic site allocations.	The policy approach is to prioritise retention unless evidence demonstrates to the Council's satisfaction that the applicant has explored a range of development options informed by a condition and feasibility assessment, and the	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	proposal constitutes the best use of the site (which includes optimising site capacity) when considered against alternative options, which include retention.	
A threshold should be introduced at the start of the policy, to make clear that "the policy relates to major development proposals only where extensive or substantial demolition is proposed.	We propose to update the supporting text to provide further information on this and clarify that substantial demolition is where 50% or more of the building's floorspace would be removed.	Change proposed
Suggestion to amend wording of part b "This includes a requirement for the applicant to explore a range of alternative uses which are likely to be considered acceptable, in principle, in accordance with other policies within this Local Plan and for which there would be a viable market demand".	We propose to amend the wording of criteria B. Developers will be expected to have comprehensively explored a range of feasible alternative development options, informed by the condition and feasibility assessment, prior to considering substantial demolition.	Change proposed
Draft policy CC2 b) should add to 'best use of the site' to include other valid planning reasons for demolition such as placemaking or regeneration benefits.	We propose to update the Plan to clarify the meaning of 'best use of the site' - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	Change proposed
A definition on the scale of demolition should be provided for part E.	We propose to update the supporting text to provide further information on this and clarify that substantial demolition is where 50% or more of the building's floorspace would be removed.	Change proposed
Amend CC2 to ensure applicants demonstrate the exploration of reusing materials onsite but also consider options for reusing	It is considered that policies CC2 and CC3 (referenced in CC2) addresses reuse onsite and offsite.	No changes proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
materials on other local sites or supplying them to be used elsewhere.		
More information needed on what is required in the condition and feasibility assessment.	This detail is contained in Camden Planning Guidance 'Energy efficiency and adaptation'. It is proposed that a cross reference to this is added.	Change proposed
Too onerous to require submission of detailed drawings for alternative options.	The submission of drawings to demonstrate what development options have been considered is important to allow the Council to determine whether alternative options have been fully explored.	No change proposed.
Suggestion to remove "before progressing the design of any scheme."	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
Paragraph 8.16 sets out that the Council will expect replacement buildings to meet or exceed the targets set out in the plan. Suggest inclusion of 'where feasible' to paragraph 8.16.	We propose to remove this paragraph from the supporting text.	Change proposed
The policy should make it clear at what stage and what level of detail is required, as part of this optioneering exercise, with appropriate supporting planning guidance.	We propose to include further clarification in the policy and supporting text on the condition and feasibility assessment and development options appraisal and when these will be required. The draft policy will be reviewed to ensure clarity over what types of development it would apply	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	to. Further detail will be made available in supplementary planning guidance.	
When considering the 'best use of the site' the objectives of policy CC2 should be weighed against other planning policies and the objectives.	Comment noted. The Local Plan should be read as a whole and all relevant policies need to be considered.	No change proposed.
Amend CC2 to ensure applicants demonstrate the exploration of reusing materials onsite but also consider options for reusing materials on other local sites or supplying them to be used elsewhere.	It is considered that policies CC2 and CC3 (referenced in CC2) addresses reuse onsite and offsite.	No change proposed.
Policy CC2 is overly onerous and open to interpretation. A subjective judgement about what constitutes 'best use of the site' has the potential to hinder proposals that respond to the market and there should be flexibility.	We propose to update the Plan to clarify the meaning of 'best use of the site' - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	Change proposed
Suggest that Part B removes reference to 'best use' and replace with a gateway test for developments that require a condition and feasibility assessment. We do not consider that a site containing existing warehouses which is already allocated for housing needs to undertake a feasibility assessment to understand the potential for reuse. This work should have already been considered at plan making/site allocation stage.	We propose to update the Plan to clarify the meaning of 'best use of the site' - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity. Further clarification is also provided in terms of what is expected by the condition and feasibility assessment and where the Council will permit schemes for demolition.	Change proposed
The policy and supporting text should cross refer to a methodology, on the scope of the condition and feasibility assessment.	This detail is contained in Camden Planning Guidance 'Energy efficiency and adaptation'. It is proposed that a cross reference to this is added.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Part D should be reworded to read "Applicants should discuss the findings of the condition and feasibility assessment and the assessment of alternative development options (as set out in criteria B and C above) with the Council, at the earliest opportunity". Suggest that "*before progressing the design of any scheme*" is deleted from Part D.	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
Need to be clearer which types of development the policy applies to, and around the definition of partial or substantial demolition	We propose to update the supporting text to provide further information on this and clarify that substantial demolition is where 50% or more of the building's floorspace would be removed.	Change proposed
If the assessment is to include whole life carbon optioneering, this has to be third party verified.	A Whole Life Carbon Assessment is not included as part of the condition and feasibility assessment.	No change proposed.
Has the council considered the supply chain to support retaining materials?	Retention and reuse of materials are considered in line with the waste hierarchy. While there may be supply chain and storage issues the principles are expected be applied to move towards a more circular economy.	No change proposed.
The policy should relate to major development proposals only.	The policy would apply to all development that includes substantial demolition. We propose to update the supporting text to include a definition of substantial demolition.	Change proposed
Part B should only apply where extensive or substantial demolition is proposed. Exploring the 'best use of the site' should be removed.	The requirement for a condition and feasibility assessment will be triggered for schemes involving substantial demolition	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	(definition to be provided in the supporting text). We propose to explain what is meant by the 'best use of the site' in the supporting text - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	
Parts B should include other planning reasons for demolition such as placemaking or regeneration.	We propose to explain what is meant by the 'best use of the site' in the supporting text - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	Change proposed
Policy CC2 must be applied on a case by case basis with consideration of each sites needs. Support for a condition and feasibility assessment to understand the reuse potential of a site at the start of the design process.	Comment noted. Each application is considered on its individual merits against all relevant policies.	No change proposed.
It is not clear whether this policy applies to all applications or major applications and even where demolition is not proposed.	The policy would apply to all development that includes substantial demolition. We propose to update the supporting text to provide a definition of substantial demolition.	Change proposed
Part B should only apply where extensive or substantial demolition is proposed. Exploring the 'best use of the site' should be removed.	The requirement for a condition and feasibility assessment will be triggered for schemes involving substantial demolition (definition to be provided in the supporting text). We propose to update the supporting text to clarify what is meant by the 'best use of	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	the site' - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	
Suggestion to include the City of London's approach to carbon optioneering.	The policy seeks to determine whether a building can be reused in principle and considering the best use of the site. Whole Life Carbon assessment is a useful tool in seeking to ensure carbon emissions of a development are minimised as much as possible once development principles are resolved – not as a means of justifying whether a building can be retained or not.	No change proposed.
Part C should apply to developments proposing substantial demolition. A definition for substantial demolition should be included.	The policy would apply to all development that includes substantial demolition. We propose to update the supporting text to provide a definition of substantial demolition.	Change proposed
Part D should be reworded to read "Applicants should discuss the findings of the condition and feasibility assessment and the assessment of alternative development options (as set out in criteria B and C above) with the Council, at the earliest opportunity".	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
Part E needs a definition of partial or substantial demolition.	We propose to update the supporting text to provide a definition of substantial demolition.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
'Best use of the site' should be removed.	We propose to update the supporting text to clarify what is meant by the 'best use of the site' - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	Change proposed
Part F should include options for reusing materials on other local sites or supplying them to be used elsewhere.	It is considered that policies CC2 and CC3 (referenced in CC2) address reuse onsite and offsite.	No change proposed
There should be more detail on what is required of the condition and feasibility assessment.	This detail is contained in Camden Planning Guidance 'Energy efficiency and adaptation'. It is proposed that a cross reference to this is added.	Change proposed
Too onerous to require submission of detailed drawings for alternative options.	The submission of drawings to demonstrate what development options have been considered is important to allow the Council to determine whether alternative options have been fully explored.	No change proposed.
Remove "before progressing any scheme" and replace with discuss at the earliest opportunity	We propose to amend the policy wording to remove reference to this and make it clear what work should be carried out prior to submission stage, namely a condition and feasibility appraisal and development options appraisal.	Change proposed.
Suggest inclusion of 'where feasible' paragraph 8.16.	We propose to remove the paragraph referred to from the supporting text.	Change proposed
The requirement to "explore a range of alternative development options" is not flexible enough and should also cater for situations where the demolition	It is considered that the policy is worded suitably flexibly and allows for consideration of whether a proposal constitutes the best	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
of a building would facilitate the delivery of other strategic infrastructure.	use of the site / optimises site capacity. We propose to update the supporting text to clarify what is meant by the 'best use of the site' - it is not limited to planning land use, it includes design and layout, contribution to housing delivery, and optimising site capacity.	
Policy CC2 represents an additional obstacle in the delivery of housing in Camden. In view of the seriousness of the undersupply of housing in Camden, this ought not to be a council priority.	The draft policy does not restrict housing development but seeks to shift towards circular economy principles of development. It is consistent with the London Plan and the Council's declaration of a climate emergency.	No change proposed
The Council should ensure that only the matters in paragraph 8.12 • A review of how the building is (or has been) used and functions; • Servicing information; • A Technical building survey; • A review of optimal site capacity Need be addressed and not introduce further requirements.	The supporting text has been updated to refer to additional information provided in Supplementary Planning Guidance.	Change proposed
The policy should include allowances for buildings which cannot be used for other purposes.	It is considered that the policy is worded sufficiently flexibly.	No change proposed.
What are the essential topics to be explored for the feasibility assessment?	The requirements of the condition and feasibility assessment is outlined in the supporting text. It is proposed that this includes a cross	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	reference to supplementary planning guidance for more information.	
If the assessment is to include whole life carbon optioneering, this has to be third party verified.	A Whole Life Carbon Assessment is not included as part of the condition and feasibility assessment.	No change proposed.
Has the council considered the infrastructure/supply chain to support the aspiration of retaining materials.	The plans expects a pre-demolition audit which will explore reuse and management of materials to maximise opportunities of reuse and reclamation.	No change proposed.

CC3 - Circular Economy and Reduction of Waste

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The policy should acknowledge that designing for adaptability can add materials and up front embodied carbon.	The policy has been drafted to ensure that development takes account of using materials with lower embodied carbon. No change is required.	No change proposed.
Clarify whether the recycled materials is by mass or by value.	We propose to include further information in supporting text on the reporting of materials in the Circular Economy Statement.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Using the formula provided the paragraph should be amended to "The result is a percentage from 10 to 100 where 100% would be retaining all materials and 10% would be completely new materials."	We propose to update the Plan to remove this formula. We propose to include further information in supporting text on the reporting of materials in the Circular Economy Statement.	Change proposed
The Policy requires all developments to optimise resource efficiency and be designed to facilitate easy maintenance and adaptability of use demonstrated in a Sustainability Statement. Suggest that criteria CC3 I and ii applies to major developments.	All development should seek to minimise waste and use resources efficiently. We propose to update the policy and supporting text to ensure the level of information needed from minor and major planning applications is clearer.	Change proposed
Clarify whether the recycled materials is by mass or by value.	We propose to include further information in supporting text on the reporting of materials in the Circular Economy Statement.	Change proposed
Using the formula provided the paragraph should be amended to "The result is a percentage from 10 to 100 where 100% would be retaining all materials and 10% would be completely new materials."	We propose to update the Plan to remove this formula. We propose to include further information in supporting text on the reporting of materials in the Circular Economy Statement.	Change proposed
Support the requirements to reduce water use during construction and water demand during operation. Consider adding demolition materials to be sorted and utilised on site wherever practicable.	We propose to update the Plan to include an expectation for any dismantled materials to be sorted and utilised on site wherever practicable.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcome the safeguarding of Camden's Regis Road waste site. It may be helpful to link this safeguarding to delivering the Agent of Change principle set out in London Plan 2021, Policy D13. The policy only deals with waste from new development, it needs to consider the way waste is produced in the borough and the relationship with the North London Waste plan as far as provision of waste capacity is concerned.	The site allocation for Regis Road states that development must ensure that non-employment uses do not compromise the operation of employment uses, which would include the recycling centre. Local Plan Policy IE3 (Industry) seeks to ensure the successful co-location of uses through innovative design approaches and to avoid non-employment uses compromising the operation of businesses in line with the 'Agent of Change' principle. Policies A1 (Protecting Amenity) and A4 (Noise) set out the Council's approach to the application of the Agent of Change principle and would be applied to all relevant planning applications.	No change proposed.
Circular economy statements only apply to major developments. All developments should facilitate the movement of waste up the hierarchy. When designing the street scenes, opportunities should be presented to collect materials for recycling and provide safe collection of waste with respect to pedestrians and other vulnerable road users.	The policy requires all development to reduce waste through the application of the waste hierarchy. Policy D1 Achieving Design Excellence requires development to "provides appropriate facilities for the storage, separation and collection of all types of waste and recycling".	No change proposed.
Clarify whether the recycled materials is by mass or by value.	We propose to include further information in supporting text on the reporting of materials in	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	the Circular Economy Statement.	
Using the formula provided the paragraph should be amended to "The result is a percentage from 10 to 100 where 100% would be retaining all materials and 10% would be completely new materials."	We propose to update the Plan to remove this formula. We propose to include further information in supporting text on the reporting of materials in the Circular Economy Statement.	Change proposed
Does the mentioned 'Waste site' comply with the 95% diversion from landfill? Can you please provide a list of stakeholders for each waste stream to avoid traffic through Camden's waste site.	Regis Road reuse and recycling centre is a safeguarded waste site. The Council's planning framework for managing waste is set out in the North London Waste Plan 2022. Further detail in the Local Plan is not necessary.	No change proposed.
The Policy requires all developments to optimise resource efficiency and be designed to facilitate easy maintenance and adaptability of use demonstrated in a Sustainability Statement. Suggest that criteria CC3 I and ii applies to major developments.	All development should seek to minimise waste and use resources efficiently. We propose to update the policy and supporting text to ensure the level of information needed from minor and major planning applications is clearer.	Change proposed
Clarify whether the recycled materials is by mass or by value.	We propose to include further information in supporting text on the reporting of materials in the Circular Economy Statement.	Change proposed
Using the formula provided the paragraph should be amended to "The result is a percentage from 10 to 100 where 100% would be retaining all materials and 10% would be	We propose to update the Plan to remove this formula. We propose to include further information in supporting text on the reporting of materials in	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
completely new materials."	the Circular Economy Statement.	

CC4 - Minimising Carbon Emissions

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcome this policy.	Support welcome.	No change proposed.
Policy CC4 is very good but undermined by para 8.27: "Where targets for embodied carbon cannot feasibly be met, a full justification will be required as part of the Whole Life Carbon Assessment". Could this be deleted?	The separate targets for embodied carbon will be replaced by whole life carbon benchmarks (including embodied carbon) set out by the GLA. Embodied carbon will remain a key focus and this is explained in the supporting text.	Change proposed.
Suggest this chapter includes a paragraph on the use of low- and zero-carbon materials such as structural wood	Agree that information on low carbon materials would be beneficial. However this level of detail would be best addressed within supplementary planning guidance rather than the local plan.	No change proposed.
Fully support Camden's targets to minimise carbon emissions across the Borough. The policy needs to ensure that it does not risk inhibiting wider development aspirations. Suggestion to amend Part A, i, b to include "(where feasible, viable and/or appropriate)".	Support welcomed. We propose to amend policy to recognise aspirational whole life carbon benchmarks may not be feasible	Change proposed
The policy should not state that A ii is a target not a requirement.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	(including embodied carbon).	
Support the principle of setting targets but these may not be achievable for all building typologies. It would be more appropriate to include targets within supplementary planning guidance as embodied carbon is a fast moving area.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Requirements must be consistent with national policy and embodied carbon limits should align with the UK net zero carbon building standard.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
The policy should reflect ambition of meeting targets rather than enforcing limits.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
There is no definition of 'substantial demolition', which should be clarified.	We propose to update the supporting text to include a definition of substantial demolition.	Change proposed
Align policy with GLA Whole Life Cycle guidance.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Embodied carbon limits are inappropriate to capture all non-domestic typologies.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Suggestion for the policy to align with the benchmarks set by the GLA whole life carbon guidance and UK net zero	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
carbon building standard once published.		
Update paragraph 8.26 to reflect the upcoming UK net zero carbon building standard.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
The policy should reflect the ambition of meeting targets rather than enforcing limits.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Definition of the scale of demolition is required.	We propose to update the supporting text to include a definition of substantial demolition.	Change proposed
Align policy with GLA Whole Life Cycle guidance.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Embodied carbon limits are inappropriate to capture all non-domestic typologies.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
This Policy should only apply to major developments and not all.	We propose to update the policy to apply to all new build major development and all development proposing substantial demolition.	Change proposed
Update paragraph 8.26 to reflect the upcoming UK net zero carbon building standard.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Align policy with GLA Whole Life Cycle guidance.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Whole life carbon and embodied carbon limits should consider other carbon intensive uses such as industrial.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Support this policy and the requirement for developments to submit whole life carbon assessments.	Support welcomed.	No change proposed.
Definition of the scale of demolition is required.	We propose to update the supporting text to include a definition of substantial demolition.	Change proposed
The policy should reflect ambition of meeting targets rather than enforcing limits.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Update to reflect the upcoming UK net zero carbon building standard.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Use the carbon optioneering guidance approach for carbon calculations.	The policy is aligned with GLA methodology for calculating whole life carbon.	No change proposed.
The policy should state that the embodied carbon limits are for 'upfront carbon' and based on current policy and RICS v1, as RICS v2 might have an impact on targets.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
How was the embodied carbon figure for non-residential set? Few non-residential building types	We propose to update the policy to replace the separate embodied carbon target with the	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
would be able to achieve this level. We fully support decarbonisation but there will potentially be issues to achieve this.	GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	
The policy should reflect ambition of meeting targets rather than enforcing limits.	We propose to amend the policy to provide for instances where aspirational benchmarks cannot be achieved.	Change proposed
There is no definition of 'substantial demolition' which should be clarified	We propose to update the supporting text to include a definition of substantial demolition.	Change proposed
Align policy with GLA Whole Life Cycle guidance.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Embodied carbon limits are inappropriate to capture all non-domestic typologies.	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
This Policy should only apply to major developments and not all.	We propose to update the policy to apply to all new build major development and all development proposing substantial demolition.	Change proposed
Paragraph 8.26 should be updated to reflect the upcoming UKNZCBS benchmarks / targets	We propose to update the policy to replace the separate embodied carbon target with the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed
Update to reflect existing GLA benchmarks and the upcoming UK net zero carbon building standard once published.	We propose to update the policy to refer to the GLAs Whole Life Cycle Carbon benchmarks (including embodied carbon).	Change proposed

CC5 - Energy Reduction in Existing Buildings

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
If Camden are to meet the very first of their priorities set out in CC5 a review of planning permissions is needed.	The Local Plan policies have been reviewed in light of the Council's declaration of a Climate and ecological emergency. Draft policies have sought to provide greater clarity and guidance on the measures that can be taken to improve energy efficiency of existing buildings, including listed buildings.	No change proposed.
CC5 A I agreed, within the parameters of conservation area strategies.	Comment noted.	No change proposed.
Passivhaus, and Enerphit could be included for further guidance.	Policy CC5 refers to retrofitting measures and whole house retrofit plans rather than certification.	No change proposed.
Can't see any reference to Article 4 direction for Parkhill and Upper Park Conservation Area on Camden's website.	There is no Article 4 Direction in Parkhill and Upper Park Conservation Area.	No change required.
Air source heat pumps should be encouraged and more flexibility provided in conservation areas.	Policy CC5 supports the installation of heat pumps. Permitted development allows for the installation of heat pumps in conservation areas provided these meet certain criteria.	No change proposed.
What are the permitted development criteria for air source heat pumps?	The Council has guidance available on this webpage - 'Home energy retrofit'; however some permitted development criteria may be subject to change – see also General Permitted	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	Development Order Schedule 2, Part 14, Class D.	
Welcome Policy CC5 and strongly support CC5 A i.	Support welcomed.	No change proposed.
Seek recognition that not all energy efficient improvements are possible due to heritage considerations.	We propose to amend policy CC5 to recognise the complexity of retrofit measures and historic buildings. We also propose to remove the table specifying fabric efficiency values from the Plan.	Change proposed
Targets in CC5 iv a are not consistent with London Plan Energy Assessment Guidance.	We propose to update Policy CC6 to also cover energy reduction in existing buildings. Further evidence has been commissioned by the Council to provide space heating and energy use intensity targets for existing buildings to support the proposed policy approach.	Change proposed.
CC5 iv c - reference to other renewable energy sources should be made, not just solar photovoltaics.	Most planning applications in the borough include solar pv as the most practical and feasible method of on site renewable energy generation. Other methods are welcome where practical / feasible.	No change proposed.
CC5 vi the policy only references an EUI target for residential uses and needs re-wording and clarifying.	Further evidence has been commissioned by the Council to provide space heating and energy use intensity targets for existing buildings to support the proposed policy approach. We propose to include targets for residential and	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	non-residential uses in Policy CC6 of the Local Plan.	
Table 6 should include acknowledgement of curtain walling performance	We propose to remove the table specifying fabric efficiency values from the Plan.	Change proposed.
Draft Policy CC5 sets out the Council's approach to reducing energy in existing buildings with the aim to ensure they contribute towards achieving local and national targets for zero carbon development.	Comment noted.	No change proposed.
It cannot be the intention to withhold planning permission for physical works if not accompanied by other changes to improve energy efficiency. We would suggest that the wording is amended to apply to major development proposals only.	We propose to update Policy CC5 to focus on encouraging the delivery of sustainable retrofit measures.	Change proposed
CC5 iv a - In an extension scenario, it is not clear whether this requirement applies to the extension or the whole building. If the latter, this will create huge challenges around ownership and occupiers. Targets in CC5 iv a are not consistent with London Plan Energy Assessment Guidance.	We propose to update the targets for existing buildings following further evidence commissioned by the council. These targets relate to the whole building.	Change proposed
CC5 part v includes all other proposals for the alteration, extension and/or conversion of an existing building, and although it is more	We propose to update Policy CC5 to focus on encouraging the delivery of sustainable retrofit measures.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
relaxed the same concerns apply for iv a.		
CC5 vi the policy references an EUI target for residential only.	Further evidence has been commissioned by the Council to provide space heating and energy use intensity targets for existing buildings to support the proposed policy approach. We propose to include targets for residential and non-residential uses in Policy CC6 of the Local Plan.	Change proposed
Paragraph 8.33 requiring all development proposals to submit a sustainability statement – is not practical or feasible. Suggest amendment to apply to major development proposals only.	We propose to update policy CC1 to set out the requirement for sustainability statements. These will be required for schemes involving the addition of one or more homes (from new and existing buildings) and proposals involving 500 square metres or more of additional or re-provided floorspace	Change proposed
CC5 Table 6, review performance of curtain walling.	We propose to remove the table specifying fabric efficiency values from the Plan.	Change proposed.
Concern policy CC5 may dissuade some sports clubs from making changes to their buildings due to cost. This may lead to buildings remaining in a poor state. Further consideration needed on how the policy would work in practice and whether some exemptions should be made to assist sports and	We propose to update policy CC5 to focus on encouraging sustainable retrofit measures.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
community groups looking to improve their facilities.		
Need for clarity on how energy targets and offset based on EUI would work.	We propose to update policy CC5 to focus on encouraging sustainable retrofit measures. We propose to update the supporting text to policy CC6 to provide further detail on energy targets and energy balance.	Change proposed
CC5 vi needs to be clear whether the EUI target applies to the new extension or whole building.	CC5 vi would relate to the whole building.	No change proposed.
Policy D6 E iii - conflicts and should be deleted. There is no evidence provided that basement construction has greater carbon impact than other types of construction.	The embodied carbon associated with basement development is generally higher than other forms of extension above ground – this has been confirmed by evidence commissioned by the council.	No change proposed.
Note requirements for proposals which include the addition or replacement of 500sqm of floorspace and support the reduced requirement for reduction in energy demand for heating in listed buildings.	Support welcomed.	No change proposed.
It cannot be the intention to withhold planning permission for physical works if not accompanied by other changes to improve energy efficiency. We would suggest that the wording is amended to apply to major	We propose to update Policy CC5 to focus on encouraging the delivery of sustainable retrofit measures.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
development proposals only.		
CC5 iv a - In an extension scenario, it is not clear whether this requirement applies to the extension or the whole building. If the latter, this will create huge challenges around ownership and occupiers. Targets in CC5 iv a are not consistent with GLA Energy Assessment Guidance.	We propose to update Policy CC5 to focus on encouraging the delivery of sustainable retrofit measures. Further evidence has been commissioned by the Council to provide space heating and energy use intensity targets for existing buildings to support the proposed policy approach. We propose to include targets for residential and non-residential uses in Policy CC6 of the Local Plan.	Change proposed
CC5 iv c - reference to other renewable energy sources should be made, not just solar photovoltaics.	Most planning applications in the borough include solar pv as the most practical and feasible method of on-site renewable energy generation. Other methods are welcome where practical / feasible.	No change proposed.
CC5 part v is more relaxed but same concerns apply for iv a.	We propose to update Policy CC5 to focus on encouraging the delivery of sustainable retrofit measures.	Change proposed.
CC5 vi the policy references an EUI target for residential only.	Further evidence has been commissioned by the Council to provide space heating and energy use intensity targets for existing buildings to support the proposed policy approach.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	We propose to include targets for residential and non-residential uses in Policy CC6 of the Local Plan.	
Paragraph 8.33 requiring all development proposals to submit a sustainability statement – is not practical or feasible. Suggest amendment to apply to major development proposals only.	We propose to update policy CC1 to set out the requirement for sustainability statements. These will be required for schemes involving the addition of one or more homes (from new and existing buildings) and proposals involving 500 square metres or more of additional or re-provided floorspace	Change proposed
CC5 Table 6, review performance of curtain walling.	We propose to remove the table specifying fabric efficiency values from the Plan.	Change proposed.
The plan could be strengthened by further references appropriately considering older buildings i.e. taking a whole house approach, and minimal interventions are taken where possible. Cross referencing to relevant section in design and heritage would be helpful.	We propose to update Policy CC5 to focus on encouraging the delivery of sustainable retrofit measures. The policy will include whole house retrofit plans for historic buildings and will cross reference to the Local Plan heritage policy.	Change proposed
The draft document is not ambitious enough for buildings in conservation areas or listed buildings.	A key challenge for the Plan is to ensure that development in Camden seeks to address the climate and ecological emergency. However we also need to consider other issues such as Camden's rich architectural heritage. Under the Planning (Listed Buildings and Conservation Areas) Act	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to the conservation of designated heritage assets in a manner appropriate to their significance. We consider the plan strikes an appropriate balance.	
It is difficult to achieve sufficient insulation in listed buildings for an ASHP to operate anywhere near efficiently. The 'whole house' approach should therefore be applied. This would mean that the permission should be contingent upon the demonstration of the feasibility of installing sufficient insulation without harming the listed asset.	The plan seeks to encourage a whole house approach to retrofit, given that the approaches to energy reduction need to work well together. Applications for Listed Building Consent would consider the impact of retrofitting measures on the heritage asset.	No change proposed.

CC6 - Energy Reduction in New Buildings

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
All new developments should meet Policy CC6. It remains to be seen how thorough and vigilant a	Policy CC6 relates to all new buildings and we also propose to update the policy to include	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
system will be in place to ensure compliance.	existing buildings. The policy requires the submission of an energy statement to demonstrate how the expectations of the policy are met.	
Strongly support the ambition to reduce energy wherever possible in new build developments but are concerned about the level of detail required and reality of monitoring this. Part A iv could be very challenging. It could be a target and not mandatory.	We propose to update the policy to ensure sufficient flexibility for applications where there is reasonable justification that targets cannot be met.	Change proposed
CC6 A v clarity is sought on how the payment in lieu for the energy balance is calculated.	We propose to include further information in the supporting text to clarify how the payment in lieu will be calculated.	Change proposed
The policy requirements in CC6 are too prescriptive and in some cases unachievable Part iv to match renewable energy generation with predicated annual energy demand will not be possible on constrained sites. Part iv c is is unlikely to be feasible on most, if not all, urban sites.	We propose to update the policy to ensure sufficient flexibility for applications where there is reasonable justification that targets cannot be met. The policy criteria for "on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m2 building footprint for all building types (at least 120 kWh/m2 for industrial buildings)." will be omitted.	Change proposed
The use of Energy Use Intensity is inconsistent with the London Plan. As currently worded, any referable applications would be required to address both Part L and	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with the ambitions of the London Plan.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
EUI. This is impractical and would add additional policy complexity and delay.	GLA Energy Assessment Guidance introduces the reporting on EUI: "These metrics will help applicants to demonstrate that they have maximised energy efficiency measures in line with the energy hierarchy, in addition to the percentage improvement target." Referable applications would need to demonstrate compliance with the London Plan (percentage improvement against Part L) and policy CC6. The energy offset would apply when the Energy Use Intensity of a building is higher than the renewable energy generated on-site (a carbon offset following Part L builsing regulations would not be required).	
The price of carbon offset should be based on robust evidence. The methodology to calculate carbon offset is flawed and would add significant costs to development. The proposed methodology and carbon price is inconsistent with the price set out in the London Plan, and there does not appear to be any viability evidence to support the offset calculation. The methodology should also take into account the supply of certified renewable energy from the grid. Where buildings	The plan approach is for an energy offset. Further information on how the payment in lieu is calculated will be provided in supporting text. The energy balance is to ensure new development in the borough can be net zero carbon in operation. The method is outlined in the Delivering Net Zero evidence study. We propose to update the policy to make it clear that it is 'subject to viability'. The energy balance seeks to ensure new	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
are supplied by certified, net additional green electricity, via a Power Purchase Agreement, the carbon offset payment should be set at a nil rate as there is no operational carbon to offset	development is net zero in operation so the energy used by a building is the same as the energy generated on-site.	
Question whether a review has been undertaken to see how the targets can be applied to real examples. The targets seem exceptionally challenging to achieve. Further information requested on how the payment in lieu is calculated.	The Delivering Net zero study modelled a number of typologies and cost analysis to provide policy options. We propose to include further information in the supporting text to clarify how the payment in lieu will be calculated.	Change proposed
Energy Use Intensity policy is inconsistent with the London Plan. The Dec 2023 Written Ministerial Statement said the government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The approach in the Draft Local Plan does not include the required 'well-reasoned and robustly costed rationale' and is inconsistent with current and with national and regional policy.	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with its the ambitions. GLA Energy Assessment Guidance introduces reporting on EUI: "These metrics will help applicants to demonstrate that they have maximised energy efficiency measures in line with the energy hierarchy, in addition to the percentage improvement target." The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. Also, as the response notes, the Written Ministerial Statement provides for local energy efficiency standards that go beyond current or planned buildings regulation provided these have a	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	well-reasoned and robustly costed rationale. We propose to update the policy to make it clear that it is 'subject to viability'.	
The space heating demand target should follow the approach in the GLA Energy Assessment Guidance, rather than be a requirement.	We propose to update Policy CC6 to include targets rather than limits.	Change proposed
Part iv. requires renewable energy generation on-site to match, or be in excess of, the predicted total annual energy demand of the building (EUI). This will not be possible for many typologies.	The Delivering Net zero study modelled a number of typologies and cost analysis to provide policy options. We propose to include further information in the supporting text to clarify how the payment in lieu will be calculated.	Change proposed
We question whether Part iv. c) has been fully justified as there does not appear to be any evidence base to support these figures. The figures should be written as targets rather than fixed requirements and take into consideration specific site circumstances that may prevent the target from being achieved	We propose to update the policy to ensure sufficient flexibility for applications where there is reasonable justification that targets cannot be met. The policy criteria for "on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m2 building footprint for all building types (at least 120 kWh/m2 for industrial buildings)." will be omitted.	Change proposed
The draft Local Plan is now inconsistent with the London Plan any referable applications will be required to address Part L and EUI. This is	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with the ambitions of the London Plan.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
impractical and not workable.	GLA Energy Assessment Guidance introduces the reporting on EUI: "These metrics will help applicants to demonstrate that they have maximised energy efficiency measures in line with the energy hierarchy, in addition to the percentage improvement target." Referable applications would need to demonstrate compliance with the London Plan (percentage improvement against Part L) and policy CC6. The energy offset would apply when the Energy Use Intensity of a building is higher than the renewable energy generated on-site (a carbon offset following Part L builsing regulations would not be required).	
Paragraph 8.63 should be reworded to read "Energy Use Intensity (EUI), or metered energy use, is the total energy needed to run a building over a year (per square metre).".	We propose to amend the supporting text on energy use intensity to "Energy Use Intensity (EUI), or metered energy use, is a measure of the total annual energy consumption of a building over a year, per metre square of floorspace, expressed as kWh/m2/year."	
The offset is inconsistent with the GLA and there is no guidance how this would apply to referable applications. There does not appear to be any viability evidence to support the offset calculation.	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with the ambitions of the London Plan. GLA Energy Assessment Guidance introduces the reporting on EUI: "These metrics will help	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	applicants to demonstrate that they have maximised energy efficiency measures in line with the energy hierarchy, in addition to the percentage improvement target."	
Energy Use Intensity is inconsistent with the London Plan. The December 2023 Written Ministerial Statement said the government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The approach in the Draft Local Plan does not include the required 'well-reasoned and robustly costed rationale' and is inconsistent with current and with national and regional policy.	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with its ambitions. GLA Energy Assessment Guidance introduces reporting on EUI: "These metrics will help applicants to demonstrate that they have maximised energy efficiency measures in line with the energy hierarchy, in addition to the percentage improvement target." The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. Also, as the response notes, the WMS provides for local energy efficiency standards that go beyond current or planned building regulations provided these have a well-reasoned and robustly costed rationale.	No change proposed.
The space heating demand target should follow the approach in the GLA Energy Assessment Guidance, rather than a requirement. This should apply only to major development.	We propose to update Policy CC6 to include targets rather than limits. The Local Plan policies have been drafted in light of the Council's declaration of a Climate and ecological emergency. The Delivering Net zero study	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	modelled a number of typologies and cost analysis to provide policy options for all new build development.	
Part iv. requires renewable energy generation on-site to match, or be in excess of, the predicted total annual energy demand of the building (EUI). This will not be possible for many typologies.	The Delivering Net zero study modelled a number of typologies and undertook cost analysis to provide policy options. It is considered a feasible policy option, and does account for instances where the energy balance cannot be achieved.	No change proposed.
We question whether Part iv. c) has been fully justified as there does not appear to be any evidence base to support these figures. The figures should be written as targets rather than fixed requirements and take into consideration specific site circumstances that may prevent the target from being achieved	We propose to update the policy to ensure sufficient flexibility for applications where there is reasonable justification that targets cannot be met. The policy criteria for "on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m2 building footprint for all building types (at least 120 kWh/m2 for industrial buildings)." will be omitted.	Change proposed
The draft Local Plan is now inconsistent with the London Plan any referable applications will be required to address Part L and EUI. This is impractical and not workable.	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with its ambitions. GLA Energy Assessment Guidance introduces reporting on EUI: "These metrics will help applicants to demonstrate that they have maximised energy efficiency	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	measures in line with the energy hierarchy, in addition to the percentage improvement target." Referable applications would need to demonstrate compliance with the London Plan (percentage improvement against Part L) and policy CC6. The energy offset would apply when the Energy Use Intensity of a building is higher than the renewable energy generated on-site (a carbon offset following Part L builsing regulations would not be required).	
Paragraph 8.63 should be reworded to read "Energy Use Intensity (EUI), or metered energy use, is the total energy needed to run a building over a year (per square metre).".	We propose to amend the supporting text on energy use intensity to "Energy Use Intensity (EUI), or metered energy use, is a measure of the total annual energy consumption of a building over a year, per metre square of floorspace, expressed as kWh/m2/year."	
Paragraph 8.65 should only apply to major developments It would be onerous for smaller applications to be assessing unregulated energy.	The Local Plan policies have been drafted in light of the Council's declaration of a Climate and ecological emergency. It is important that all development in the borough contributes to meeting the net zero target. The policy requirements are supported by the Delivering Net Zero evidence study where a number of typologies were modelled with cost analysis.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The offset is inconsistent with the GLA and there is no guidance how this would apply to referable applications. Clarification is sought on whether the contribution will be used to provide solar pv on other sites, rather than a source of funds to reduce carbon on other projects.	London Plan policy SI2 D states boroughs must establish and administer an offset fund, it does not prescribe how the offset must be undertaken. Referable applications would need to demonstrate compliance with SI2 and the energy offset would be an assessment of policy CC6 and the energy balance. The energy offset will be used to deliver a range of carbon reduction measures in the borough.	No change proposed.
There does not appear to be any viability evidence to support the offset calculation or to demonstrate the impact on individual developments. The offset price appears punitive for offices.	The calculation has been developed through the Delivering Net Zero study in ensuring new development in the borough can be net zero carbon in operation. This policy requirement has been included within the Local Plan viability assessment. The energy offset calculation is the same for all types of new build development.	No change proposed.
We would recommend that a paragraph be added acknowledging that increased water efficiency can reduce requirements	Reducing water use is addressed in policy CC3 and CC9. It is not considered appropriate to add into policy CC6.	No change proposed.
Part A should make clear this relates to major development only.	This policy relates to all new development in the borough, not just major development.	No change proposed.
CC6 A ii does not acknowledge that there are situations where this	We propose to update Policy CC6 to include targets rather than limits.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
will not be achievable. The wording should be more flexible.		
Target of 80kwh/m2 is unlikely to be feasible.	We propose to update Policy CC6 to include targets rather than limts and provide scope for flexibility i.e. 'where it can be justified to the Council's satisfaction.' Omit "on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m2 building footprint for all building types (at least 120 kWh/m2 for industrial buildings)."	Change proposed
The draft Local Plan would be inconsistent with the London Plan and so any referable applications would be required to address both Part L and EUI. This is impractical and unworkable.	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with the ambitions of the London Plan. GLA Energy Assessment Guidance introduces reporting on EUI: "These metrics will help applicants to demonstrate that they have maximised energy efficiency measures in line with the energy hierarchy, in addition to the percentage improvement target." Referable applications would need to demonstrate compliance with the London Plan (percentage improvement against Part L) and policy CC6. The energy offset would apply when the Energy Use Intensity of a building is higher than the	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	renewable energy generated on-site (a carbon offset following Part L builsing regulations would not be required).	
Suggested change to wording in paragraph 8.63 to "Energy Use Intensity (EUI), or metered energy use, is the total energy needed to run a home building over a year (per square metre)."	We propose to amend the supporting text on energy use intensity to "Energy Use Intensity (EUI), or metered energy use, is a measure of the total annual energy consumption of a building over a year, per metre square of floorspace, expressed as kWh/m2/year."	
The offset is inconsistent with the GLA and there is no guidance how this would apply to referable applications.	London Plan policy SI2 D states boroughs must establish and administer an offset fund, it does not prescribe how the offset must be undertaken. Referable applications would need to demonstrate compliance with SI2 and the energy offset would be an assessment of policy CC6 and the energy balance. A carbon offset following Part L builsing regulations would not be required.	No change proposed.
The proposed offset price appears to be particularly punitive for offices. 8.67 - we would suggest that the offset pricing is set out within a Supplementary Planning Document rather than within the Local Plan.	The offset is required when an equal balance is not achieved between target EUI (depending on building type) and renewable energy generation to be achieved on site. The offset price will be updated as required to reflect changes to the cost of solar installation. We propose to update the	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	policy to make it clear that it is 'subject to viability'.	
The Council should consider whether this policy accords with national planning policy and guidance	Policy CC6 aligns with paragraphs 161 and 162 of the NPPF.	No change proposed.
The Council should consider whether this policy contains sufficient information to cover all uses.	Policy CC6 includes the building types within the Delivering Net Zero study. For building types not specifically covered the policy makes clear that the 'nearest equivalent' use applies.	No change proposed.
The Council should consider whether the monitoring requirement is reasonable and how it would work in practice? Minor development there may not be able to afford or have the knowledge to address policy requirements.	We propose to update the requirement for monitoring to major development only as required by the London Plan 'Be Seen'.	Change proposed
It is not clear whether the EUI targets have been reviewed in real life examples and what impact they will have on deliverability.	The Delivering Net Zero study reviewed a number of typologies with energy modelling and cost analysis. We propose to update the policy to make it clear that it is 'subject to viability'.	Change proposed
Further information sought on the carbon payment in lieu and relationship to the GLA Part L model. It is important any payment in lieu works alongside the GLA's offset payment arrangements.	London Plan policy SI2 D states boroughs must establish and administer an offset fund, it does not prescribe how the offset must be undertaken. Referable applications would need to demonstrate compliance with the London Plan (percentage improvement against Part L) and policy CC6. The energy offset	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	would apply when the Energy Use Intensity of a building is higher than the renewable energy generated on-site (a carbon offset following Part L builsing regulations would not be required).	
The office EUI target does not align with UKGBC Net Zero Paris Proof target of 55 kWh/m2/yr	The EUI target for offices has been based on local level evidence in the Delivering Net Zero study.	No change proposed.
80kwh/m2 footprint of onsite renewable energy is unrealistic.	We propose to update the policy to ensure sufficient flexibility for applications where there is reasonable justification that targets cannot be met. The policy criteria for "on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m2 building footprint for all building types (at least 120 kWh/m2 for industrial buildings)." will be omitted.	Change proposed
Monitoring should extend 5 years. This information should be used to implement measures to reduce energy consumption.	The monitoring period of 5 years is considered satisfactory at this time, in line with London Plan policy SI2 Minimising Greenhouse Gas Emissions.	No change proposed.
The Energy Assured performance method should also include a NABERs model as an acceptable assessment for predicted energy usage for non-residential schemes	We propose to update the energy modelling requirement to omit references to specific modelling and as such NABERS will not be included. Energy performance modelling	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	should be undertaken in accordance with the Chartered Institution of Building Service Engineers (CIBSE) Technical Memorandum 54 Operational Energy (TM54) or its successor.	
Note residential to be fossil free, however conflict with teaching facilities and schools, as they fall under 2 criteria	There is no perceived conflict there is a clear distinction between schools and higher education teaching facilities.	No change proposed.
The space heating demand target should follow the approach in the GLA Energy Assessment Guidance, rather than being a requirement.	We propose to update Policy CC6 to include targets rather than limits.	Change proposed
Part iv. requires renewable energy generation on-site to match, or be in excess of, the predicted total annual energy demand of the building (EUI). This will not be possible for many typologies and is therefore not feasible and unsound	The Delivering Net zero study modelled a number of typologies and cost analysis to provide policy options. It is considered a feasible policy option, and does account for instances where the energy balance cannot be achieved.	No change proposed.
Question whether Part iv. c) has been fully justified as there does not appear to be any evidence base to support these figures. The figures should be targets rather than requirements and take into consideration specific site circumstances.	We propose to update the policy to ensure sufficient flexibility for applications where there is reasonable justification that targets cannot be met. The policy criteria for "on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m2 building footprint for all building types (at least 120 kWh/m2 for industrial	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	buildings)." will be omitted.	
As the draft Local Plan is now inconsistent with the London Plan, any referable applications will be required to address Part L and EUI. This is impractical and not workable.	The London Plan requires all major development to be net zero carbon and as such draft policy CC6 is in line with the ambitions of the London Plan. GLA Energy Assessment Guidance introduces the reporting on EUI: "These metrics will help applicants to demonstrate that they have maximised energy efficiency measures in line with the energy hierarchy, in addition to the percentage improvement target." Referable applications would need to demonstrate compliance with the London Plan (percentage improvement against Part L) and policy CC6. The energy offset would apply when the Energy Use Intensity of a building is higher than the renewable energy generated on-site (a carbon offset following Part L builsing regulations would not be required).	No change proposed.
Suggested change to wording in paragraph 8.63 to "Energy Use Intensity (EUI), or metered energy use, is the total energy needed to run a building over a year (per square metre GIA)."	We propose to amend the supporting text on energy use intensity to "Energy Use Intensity (EUI), or metered energy use, is a measure of the total annual energy consumption of a building over a year, per metre square of floorspace, expressed as kWh/m2/year."	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Paragraph 8.65 should only apply to major developments. It would be incredibly onerous for smaller applications.	An Energy Statement will be required for all new build development, and development proposing substantial demolition, where one or more homes are created or 500 square metres or more floorspace. The paragraph referred to will be updated to omit specific modelling. Energy performance modelling should be undertaken in accordance with the Chartered Institution of Building Service Engineers (CIBSE) Technical Memorandum 54 Operational Energy (TM54) or its successor.	No change proposed.
The offset is inconsistent with the GLA and there is no guidance how this would apply to referable applications.	London Plan policy SI2 D states boroughs must establish and administer an offset fund, it does not prescribe how the offset must be undertaken. Referable applications would need to demonstrate compliance with SI2 and the energy offset would be an assessment of policy CC6 and the energy balance. A carbon offset following Part L builsing regulations would not be required.	No change proposed.
The study underpinning this fee presupposes extensive use of PVs, and is based on off-site carbon savings being achieved solely by PVs. This is impossible in Camden, and is both unreasonable and legally	The offset is required when an equal balance is not achieved between target EUI (depending on building type) and renewable energy generation to be achieved on site. Its an energy and not carbon offset used to	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
unsound. The carbon charge as proposed is unjustified, would not comply with CIL Regulation 122, would not comply with relevant London Plan policy, and would have an adverse, effect on development viability.	ensure that all new development in Camden will be net zero carbon in operation. Funds collected will be used to deliver carbon reduction measures in the borough and considered to comply with CIL Regulation 122.	
CC6 i is contrary to national policy. The Council's viability assessment does find that this has a 'more notable' impact on viability.	The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. We do however propose to update the policy to provide greater flexibility and include viability considerations.	Change proposed
Energy Use Intensity is an unwelcome policy hurdle. The 35kwh/m2 is very difficult to achieve in practice. The solar power needed would have to cover 80 to 100% of the roof and some residential build types will not, therefore, be able to achieve the 35KWH/m2/yr in roof area.	The policy has been informed by the Delivering Net Zero study which shows that the energy use intensity targets, space heating demand, and energy balance are achievable.	No change proposed.
Using EUI as a measure, would conflict with the Minister for Housing's statement of the 13 December 2023.	Noted that EUI and the energy balance is focused on the delivery of net zero buildings in operation. The Planning and Energy Act 2008 gives provisions to Local Planning Authorities to set energy targets. The Written Ministerial Statement provides for local energy efficiency standards that go beyond current or planned building regulations. It is not considered to conflict with	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	the Written Ministerial Statement.	
Part vi will be challenging to achieve as housebuilders rarely have any ability, or the means, to enforce monitoring post-occupation monitoring.	We propose to amend the requirement for monitoring to major development only as required by the London Plan 'Be Seen'.	Change proposed
The policy is unhelpful and will introduce additional hurdles against improving rates of housebuilding. Recommend the Council abandons this policy allowing instead housebuilders to build to the Building Regulations.	We propose to update Policy CC6 to include targets rather than limts and provide scope for flexibility i.e. 'where it can be justified to the Council's satisfaction.' The space heating demand target will be reduced to 20 or less kWh/m2 GIA/yr Omit "on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m2 building footprint for all building types (at least 120 kWh/m2 for industrial buildings)."	Change proposed
The EUI target set out in draft Policy CC6 is greater than the GLAs target as set out in the Energy Assessment Guidance.	The EUI target for offices has been based on local level evidence in the Delivering Net Zero study.	No change proposed.
Part A iv C requires renewable energy generation on-site to match, or be in excess of, the predicted total annual energy demand of the building (EUI). The policy should be amended to state that photovoltaics have been maximised as far as	We propose to remove the following wording "on-site renewable energy generation (e.g. through photovoltaics (PVs) has been maximised and achieves at least 80 kWh/m2 building footprint for all	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
possible relative to the proposed developments use and form. It is unreasonable to require an absolute contribution value from PVs without taking this into consideration.	building types (at least 120 kWh/m2 for industrial buildings)."	

CC7 - Heat Networks

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The Council must urge the network providers to make design and technical details of requirements for connection and contact information clear, and up to date; and use the latest carbon factors in their calculation of the carbon intensity of the network.	The policy is drafted in accordance with the London Plan and related GLA Energy Assessment guidance which includes what carbon factors should be used.	No change proposed.
Connecting to a network that will continue to run on fossil fuel for a number of years is out of sync with more ambitious environmental targets. Suggest that the policy is revised to enable an option to connect to the network only after the decarbonisation plan proposed by network operators is physically implemented.	We propose to update the supporting text to include the expectation that connection will be provided to existing networks provided that the network does not exceed the CO2 emission and primary energy factor limits set out in Part L 2021 and the network operator has agreed a decarbonisation strategy with the GLA and the relevant borough, or is in the process of doing so (unless otherwise updated). .	Change proposed
The policy needs clarity about decarbonising the existing networks,	It is not possible at this time to state a timeframe for when existing	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
otherwise there is no point on prioritising connection.	networks will be decarbonised and this is outside of the scope of the Local Plan.	

CC8 - Overheating and Cooling

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcome and support policy CC8	Support welcomed	No change proposed.
Conservation area rules must not get in the way of promoting cooling work on existing housing.	Local Plan Policy D5 Heritage states that the Council will support proposals to adapt and improve housing provided that they do not cause harm to a heritage asset.	No change proposed.
It is difficult for existing buildings to incorporate other passive measures. Restaurant tenants which contain kitchens with higher heat gains, there is a requirement for active cooling to be provided to meet the peak summer conditions.	We propose to update the policy to include 'feasible' measures following the cooling hierarchy, as not all measures will be practical.	Change proposed
The requirement to provide photovoltaics is onerous and does not take account of site characteristics, or ownership.	The requirement for solar panels and greening is justified due to the proportion of energy consumed by air conditioning units and the fact that they expel hot air, making the local microclimate hotter. However we propose to update the policy to make it clear that this is 'where feasible' to recognise instances where this may not always be possible.	Change proposed
The requirement to offset the energy needed for active cooling through solar pv is unnecessary	The requirement for solar panels and greening is justified due to the proportion of energy	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
and will be captured through Whole Life carbon assessment.	consumed by air conditioning units and the fact that they expel hot air, making the local microclimate hotter. Whole life carbon assessments are not required for all development and would not be captured. However we propose to update the policy to make it clear that this is 'where feasible' to recognise instances where this may not always be possible.	
Requirement for materials and finishes having the ability to reflect sunlight is unnecessary and should be removed.	Overheating is a key risk and affects health and wellbeing. Measures to ensure our environment and buildings can provide natural cooling are essential.	No change proposed.
Add where feasible in paragraph 8.77	We propose to update policy CC8 and supporting text to include feasibility of measures following the cooling hierarchy.	Change proposed
Suggested wording change to CC8 iii.	We propose to update policy CC8 to allow active cooling where other passive measures have been integrated and is justified by dynamic thermal modelling.	Change proposed
Requirement for materials and finishes having the ability to reflect sunlight is unnecessary and should be removed.	Overheating is a key risk and affects health and wellbeing. Measures to ensure our environment and buildings can provide cooling are essential.	No change proposed.
Add where feasible in paragraph 8.77	We propose to update policy CC8 and	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	supporting text to include feasibility of measures following the cooling hierarchy.	
Support this policy. Recommend that reference to The London Climate Resilience Review 2024 is made.	Support welcomed. We have reviewed the recommendations in the London Climate Resilience Review. No change is considered necessary.	No change proposed.
Request that the policy is re-worded to acknowledge situations where active cooling is required.	We propose to update policy CC8 to allow active cooling where other passive measures have been integrated and is justified by dynamic thermal modelling.	Change proposed
The requirement to offset the energy needed for active cooling through solar pv is unnecessary and will be captured through Whole Life carbon assessment.	The requirement for solar panels and greening is justified due to the proportion of energy consumed by air conditioning units and the fact that they expel hot air, making the local microclimate hotter. Whole life carbon assessments are not required for all development and would not be captured. However we propose to update the policy to make it clear that this is 'where feasible' to recognise instances where this may not always be possible.	Change proposed
Requirement for materials and finishes having the ability to reflect sunlight is unnecessary and should be removed.	Overheating is a key risk and affects health and wellbeing. Measures to ensure our environment and buildings can provide cooling are essential.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Add where feasible in paragraph 8.77	We propose to update the policy and supporting text to include 'feasible' measures following the cooling hierarchy as not all measures will be practical.	Change proposed
No mention of using TM52 or TM59 to assess the risk of overheating.	We propose to update the policy to reflect London Plan policy for major development. These will be expected to undertake overheating assessments – referring in the supporting text to TM59, TM42, and TM49.	Change proposed
Consider risk of glare for reflective surfaces.	We propose to update the policy to expect developers to minimise the adverse impacts of overheating through design measures. It is not however considered necessary to add in the risk of glare.	Change proposed.
Mitigation measures such as trees should be identified in conjunction with wind microclimate studies.	Where microclimate studies are required, these factors would be taken into consideration.	No change proposed.
There is no mention of natural ventilation or mixed mode ventilation to tackle overheating.	Design layouts to promote natural ventilation is already mentioned in the supporting text. We propose to update the supporting text to refer to the need to explore the use of mechanical ventilation with heat tempering before air conditioning, in line with the London Plan cooling hierarchy.	Change proposed
Clarity needed on what is required to demonstrate	We propose to update the policy to expect developers to minimise	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
cooling spaces around buildings.	the adverse impacts of overheating through design measures. Measures are referred to in more detail in the supporting text.	
Request that this policy is applied flexibly to major public institutions which will require a degree of cooling to manage large visitor numbers and a controlled climate required by much of the collection.	We propose to update the policy to allow active cooling where all other feasible measures in the cooling hierarchy have been integrated into the development and there is still a clear need for active cooling demonstrated by dynamic thermal modelling.	Change proposed
Reword CC8 iii to say applications including active cooling will be resisted unless justified by dynamic thermal modelling and the design already integrates passive measure. Removing requirement to offset carbon through solar pv.	The requirement for solar panels and greening is justified due to the proportion of energy consumed by air conditioning units and the fact that they expel hot air, making the local microclimate hotter. Whole life carbon assessments are not required for all development and would not be captured. However this will make it clear this is 'where feasible' to recognise instances where this may not always be possible.	Change proposed
Requirement for materials and finishes having the ability to reflect sunlight is unnecessary and should be removed.	Overheating is a key risk and affects health and wellbeing. Measures to ensure our environment and buildings can provide cooling are essential.	No change proposed.
Add where feasible in paragraph 8.77	We propose to update the policy and supporting text to include 'feasible' measures following the	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	cooling hierarchy as not all measures will be practical.	

CC9 - Water Efficiency

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcome and support policy CC9	Support welcomed.	No change proposed.
Part iv. should be reworded to read "Require all new buildings to include greywater or rainwater harvesting appropriate to the scale and nature of the proposed development.	All new development will be required to be water efficient; this could include a greywater system. It will depend on the scale and nature of the development.	No change proposed.
Pleased to see that this policy requires residential developments to achieve a water efficiency of 110 litres of water per head per day.	Support welcome.	No change proposed.
Pleased to see the policy will strongly encourage proposals for residential developments to achieve even higher levels of water efficiency. Strongly encourage this to be a requirement.	Without further evidence to justify higher levels of water efficiency the Local Plan is not able to include 85 litres per person per day as a requirement at this time.	No change proposed.
Suggest remove 'unless it can be demonstrated that it is not technically feasible' - this does not exist in the London Plan policy.	Agreed. We proposed to remove reference to technical feasibility, in line with the London Plan.	Change proposed
Support mention of rainwater harvesting in line with the London Plan drainage hierarchy.	Support welcomed.	No change proposed.
Supportive of the requirement for major and high/intense water use	Support welcome. The policy reflects that greywater systems may	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
buildings to include a grey water system Suggestion to remove 'that this is not feasible or practical'. Grey water recycling systems are not considered impractical in new developments and we do not believe that the Council should accept new development that does not include it.	not always be feasible, but requires them where it is feasible.	
We would like to see a line in Policy CC9 that insists that all retrofits, refurbishments and/or changes of building include the installation of water efficient fittings and fixtures. We would also like for the retrofitting of rainwater harvesting and greywater recycling systems to be encouraged.	Agreed. We propose to update and amend policy CC5 to focus on retrofitting, which will include encouragement to install water efficient fixtures and fittings, and rainwater harvesting.	Change proposed.
85litres / per day' is very difficult to achieve in practice, and target should be reviewed.	85 litres per person per day was strongly encouraged' not a requirement.	No change proposed.
Will all building be suitable for rainwater harvesting?	All new buildings should have scope to include rainwater harvesting. The policy states this should be 'appropriate to the scale and nature of the development proposal'.	No change proposed.
Part iv. should be reworded to read "Require all new buildings to include greywater or rainwater harvesting appropriate to the scale and nature of the proposed development".	All new development will be required to be water effiicient, this could include a greywater system. It will depend on the scale and nature of the development.	No change proposed.
Clarify what is required by Part A i) if this involves	We propose to update the policy to state the building	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
more than building to 110 litres per person per day, or what is set out in parts iv) and v) of this policy	regulations requirement of 110 litres per person per day.	

CC10 - Sustainable Design and Construction Certification

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcome and support policy CC10	We propose to incorporate the requirement for BREEAM certification for non-residential buildings into policy CC6 and delete this policy.	Policy to be deleted and BREEAM requirement to be combined with policy CC6.
Part ii. should clarify whether this applies to changes of use applications where no physical works are proposed	We propose to incorporate the requirement for BREEAM certification for non-residential buildings into policy CC6 and delete this policy. The requirement for BREEAM assessment will apply to non-residential development that provides 500sqm or more of additional or reprovided floorspace	Policy to be deleted and BREEAM requirement to be combined with policy CC6.
Clarify whether policy requirement is for new build residential development.	We propose to incorporate the requirement for BREEAM certification for non-residential buildings into policy CC6 and delete this policy. The requirement for BREEAM assessment will apply to non-residential development that provides 500sqm or more	Policy to be deleted and BREEAM requirement to be combined with policy CC6.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	of additional or reprovided floorspace	
It will be useful to have 500sqm minimum.	We propose to incorporate the requirement for BREEAM certification for non-residential buildings into policy CC6 and delete this policy. The requirement for BREEAM assessment will apply to non-residential development that provides 500sqm or more of additional or reprovided floorspace	Policy to be deleted and BREEAM requirement to be combined with policy CC6.
How will a mixed use building be accounted for?	We propose to incorporate the requirement for BREEAM certification for non-residential buildings into policy CC6 and delete this policy. The requirement for BREEAM assessment will apply to non-residential development that provides 500sqm or more of additional or reprovided floorspace	Policy to be deleted and BREEAM requirement to be combined with policy CC6.
Achieving BREEAM excellent may be more difficult in sensitive heritage environments – request that it is applied flexibly.	The supporting text to Policy CC6 will be updated to recognise heritage constraints.	Change proposed
Further clarification sought as to when the policy would apply.	We propose to incorporate the requirement for BREEAM certification for non-residential buildings into policy CC6 and delete this policy.	Policy to be deleted and BREEAM requirement to be combined with policy CC6.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	The requirement for BREEAM assessment will apply to non-residential development that provides 500sqm or more of additional or reprovided floorspace	

CC10 - Flood risk

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Is Primrose Hill really a flood risk zone? Sewers were re-laid in the 1990s. Should the map be updated?	The borough's Strategic Flood Risk Assessment has been updated to inform the new Local Plan. This took into consideration existing Local Flood Risk Zones. The area covered by the LFRZ includes streets affected by surface water flood events in 1975, 2002, 2021. The SFRA also reported a high number of sewer flooding incidents in this area (records from 2013 – 2023).	No change proposed.
Suggestion to include additional criteria "Maximise the use of nature-based solutions including rain gardens and new tree planting."	Reference to nature based solutions such as green and blue roofs and permeable landscaping to reduce surface water run off has been included in policy CC11 Sustainable drainage.	No change proposed.
welcome and support policy CC10	Support welcomed.	No change proposed.
Please ensure a drainage capacity assessment at South End Green is being done as part of the Managing Flood Risk plan, and that a surface	Drainage studies are not within the scope of the Local Plan. We have passed this comment to the Lead Local Flood Authority.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
water modelling study for South End Road and South End Green is done in 2024.		
Please complete a study of drainage capacity and storage capacity study in South End Green to identify interventions for managing flood risk.	Drainage studies are not within the scope of the Local Plan. We have passed this comment to the Lead Local Flood Authority.	No change proposed.
There is a serious issue of flooding at South End Road and South End Green which needs to be addressed urgently. a surface water runoff model for Hampstead Heath and South End Road and South End Green should be undertaken as a matter of urgency. The Council should hold regular open public meetings with Thames Water in the area. All drains in the area should be checked and cleared.	Drainage studies and local flood interventions are not in the scope of the Local Plan. We will pass this comment to the Lead Local Flood Authority.	No change proposed.
The Council should not permit new basements in areas at risk of flooding. The Council should incorporate tree planting and in-ground rain gardens into all public works.	The Local Plan requires that applications for basement development in areas at risk of flooding in Camden need to undertake a Flood Risk Assessment (in addition to a Basement Impact Assessment). In areas of flood risk basements are not permitted to include habitable rooms. Policy T1 Safe Healthy and Sustainable Transport supports the delivery of highways greening measures, including raingardens.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
South End Green floods regularly. Perhaps cobble stones or a more porous road surface would ameliorate the situation.	Comment noted. We have passed this comment onto the Lead Local Flood Authority.	No change proposed.
Request to model surface water runoff for Hampstead Heath, South End Road, and South End Green to be undertaken and to hold regular public meetings with Thames Water, local businesses, residents, and representative groups to review and action factors which contribute to increased flood risk. The Council should: • Install sustainable drainage systems in all public works in areas susceptible to flooding; • Incorporate tree planting or gardens in all public works; • Require an increase in green space in all new development; • Refrain from permitting basement development in areas at risk of flooding; and • Mandate rainwater harvesting and stormwater attenuation tanks in all new development.	Drainage studies and local flood interventions are not within the scope of the Local Plan. We will pass this comment to the Lead Local Flood Authority. The Local Plan requires that applications for basement developments need to undertake a Flood Risk Assessment in areas at risk of flooding in Camden (in addition to a Basement Impact Assessment). In areas of flood risk basements are not permitted to include habitable rooms (bedrooms). Policy CC9 includes a requirement for all new development to include rainwater harvesting. Policy T1 Safe Healthy and Sustainable Transport supports the delivery of highways greening measures, including raingardens. Policy CC11 includes a requirement for all new development to follow the drainage hierarchy and resist impermeable surfaces.	No change proposed.
A surface water runoff model for Hampstead Heath and South End Road and South End	Drainage studies are not in the scope of the Local Plan. We will pass this	No change required.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Green should be undertaken in 2024.	comment to the Lead Local Flood Authority.	
The Council should hold regular open public meetings with Thames Water, local businesses, residents and representative groups from the South End Road and South End Green area, to review and action flood risk issues.	This is not a matter than can be dealt with by the Local Plan. We have passed this comment to the Lead Local Flood Authority.	No change proposed.
Suggestions to reduce flood risk: SuDs in all public works in areas at risk of flooding, more tree planting, increase green space in new development, not permit basement development in areas at risk of flooding, and require rainwater harvesting in all new development.	This is not a matter than can be dealt with by the Local Plan. We have passed this comment to the Lead Local Flood Authority. Policy CC11 requires installation of green and blue roofs where feasible and permeable landscaping. The Local Plan requires that applications for basement development need to undertake a Flood Risk Assessment in areas at risk of flooding in Camden (in addition to a Basement Impact Assessment). In areas of flood risk basements are not permitted to include habitable rooms. Policy CC9 includes a requirement for all new development to include rainwater harvesting.	No change proposed.
Request to model surface water runoff for Hampstead Heath, South End Road, and South End Green. Suggestions to	Drainage studies and local flood interventions are not within the scope of the Local Plan. We have passed this	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
reduce flood risk: SuDs in all public works in areas at risk of flooding, more tree planting, increase green space in new development, not permit basement development in areas at risk of flooding, and require rainwater harvesting in all new development.	comment to the Lead Local Flood Authority. Policy CC11 requires installation of green and blue roofs where feasible and permeable landscaping The Local Plan requires that applications for basement development need to undertake a Flood Risk Assessment in areas at risk of flooding in Camden (in addition to a Basement Impact Assessment). In areas of flood risk basements are not permitted to include habitable rooms. Policy CC9 includes a requirement for all new development to include rainwater harvesting.	
Camden Council should expect all developments upstream of areas vulnerable to flooding to go beyond just achieving the greenfield runoff rate. should be expected to go beyond the greenfield run off rate, e.g. by installing attenuation tanks, making existing paths and hardstanding permeable. Require developments upstream of areas vulnerable to flooding do much more to hold back stormwater	A greenfield run off rate is the runoff rate from a site in its natural state, prior to any development. Achieving this is challenging and we would not expect a rate higher than this to be a requirement at present. The drainage hierarchy includes attenuation tanks. The approach taken is consistent with the London Plan. Policy CC11 resists impermeable surfaces unless demonstrated it is unavoidable. Major developments upstream of areas	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	vulnerable to flooding will help to mitigate flooding as they are required to install sustainable drainage systems in line with the drainage hierarchy.	
One of the SFRA's key recommendations is: "Consideration should be made of the impact of development in the Counters Creek Catchment on sewer capacity in the London Borough of Camden and neighbouring areas, including the Borough of Brent, Royal Borough of Kensington and Chelsea and City of Westminster. Restricting to greenfield runoff as a minimum is strongly recommended to reduce the potential risk of surface water flooding within the Counters Creek Catchment."	Policy CC11 requires major development to achieve a greenfield run off rate. The Local Plan acknowledges there is a greater risk of flooding to people and property in the downstream reaches of the Counters Creek Catchment, than in Camden, which is in the upstream catchment. The policy requires that basement development and all other development vulnerable to flooding in areas identified at risk of flooding located within the Counters Creek catchment area should seek to reduce surface water run-off rates to be as close to the greenfield run-off rate as feasible.	No change proposed.
Camden Council should earmark sufficient land upstream of areas vulnerable to flooding for flood control	Local flood interventions are outside of the scope of the Local Plan. We have passed this comment to the Lead Local Flood Authority.	No change proposed.
Camden Council should develop a surface water flood model for the South Hampstead/Kilburn Priory area.	A drainage study is outside of the scope of the Local Plan. We have passed this comment to the Lead Local Flood Authority.	No change proposed.
The Council should install more SUDS in open	Local flood interventions are outside of the scope	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
spaces upstream of the areas vulnerable to flooding, and insist developers plant many more trees and vegetation.	of the Local Plan. We have passed this comment to the Lead Local Flood Authority.	
Insist that developments upstream of areas vulnerable to flooding must introduce a significant numbers of trees and vegetation.	The local plan seeks to increase the proportion of space which slows water runoff commensurate with the scale and nature of a development. All major development would be required to achieve a greenfield run off rate following the London Plan drainage hierarchy. There are other policies in the Local Plan which seek to increase more trees and planting these are CC8 for cooling purposes, and NE1 and NE3 which protects existing trees and seeks to secure additional trees.	No change proposed.
The Council should not allow new basements in locations upstream of areas vulnerable to flooding, as well as in the vulnerable areas themselves	Policy D6 Basements seeks to limit basement excavation to the footprint of the host building. Policy CC10 requires a Flood Risk Assessment for all basement development and policy D6 does not permit habitable rooms in areas at risk of flooding. Applications for basements are also required to submit a Basement Impact Assessment.	No change proposed.
Camden Council should implement other ways of reducing the risk of flooding including not allowing home owners to	Unless directed by an Article 4 Direction home owners can pave 5 square metres of front gardens with	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
pave over their front gardens other than permeable materials, installing major SUDS schemes underneath parking bays, encouraging collection of rainwater, requiring utility companies to introduce SUDS materials when they dig up the roads, allowing home owners in conservation areas to install flood protection measures, such as flood doors.	impermeable material, without the need for planning permission. Other flood interventions that are not required as part of a planning application (within the site) are outside of the scope of the Local Plan. Policy CC10 supports the retrofitting of flood resilience and flood resistance measures to properties that have previously experienced flooding, or are at risk of flooding.	
It is those far and wide upstream who don't flood who can and should be doing much more to hold back their storm water. These should go beyond just achieving the greenfield runoff rate. For example, require that any development increasing a building's footprint by 10% or more to install effective and deep stormwater attenuation tanks, as well as making any existing paths and hard standing permeable.	A greenfield run off rate is the runoff rate from a site in its natural state, prior to any development. Achieving this is challenging. The drainage hierarchy includes attenuation tanks. The approach taken is consistent with the London Plan. Policy CC11 states that impermeable surfacing will be resisted unless demonstrated that it is unavoidable and encourages all development to replace impermeable surfacing where feasible.	No change proposed.
Welcome recognition of flooding through Local Flood Risk Zones and overall support the policy, in particular reducing flood risk, mitigating the impacts of flooding, requirements for flood risk assessment, and	Support welcomed. Draft site allocations have been reviewed in to identify potential flood risk and impact on water sources. Thames Water have also reviewed the sites proposed additional policy wording where needed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
retrofitting measures for flood resilience. Recommendation to conduct an Integrated Water Management Strategy in locations identified for major re-development.	An Integrated Water Management Strategy is therefore not considered necessary at this time.	
The draft policy does not indicate the limits for sewer discharge rates at Counters Creek - the policy is left open to interpretation.	The policy criteria in relation to Counters Creek will be altered to reducing surface water run off as far as possible and achieving a greenfield run off rate.	Change proposed.
There is no evidence to support basement development to existing buildings being subject to greater restrictions than above ground extensions.	The Council's updated Strategic Flood Risk Assessment 2024 provides evidence to support the policy approach for basements and consideration of flood risk.	No change proposed.
Our research suggests that the source of the River Westbourne is Branch Hill Pond and not Whitestone Pond as noted in the updated Strategic Flood Risk Assessment. Could this be an addendum to the attached *Camden Strategic Flood Risk Assessment*	We propose to provide an addendum to the SFRA on the source of the River Westbourne, and any name errors.	Change proposed
There are many more actions Camden Council could take to reduce the risk of flooding, not covered by the new SFRA 2024, and not mentioned in the draft Local Plan.	Comment noted.	No change proposed.
The Council should implement other ways of reducing flood risks: • Not allowing home owners to pave over their front gardens with	Comment noted. The Local Plan only applies where there is a planning application. Unless directed by an Article 4 Direction home owners	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
anything other than permeable materials, no matter what size of area is being covered. • Installing major SUDS schemes underneath parking bays at key locations above areas vulnerable to flooding. (For example, in relation to our area in the eastern sloping parts of Goldhurst Terrace and Greencroft Gardens.)	can pave 5 square metres of front gardens with impermeable material, without the need for planning permission. Draft local plan policy CC11 Sustainable Drainage includes requirements for developers to specify permeable surfaces and the Council will resist proposals for non-permeable surfaces. All major developments are required to produce Sustainable Drainage Systems as per CC11.	
Encourage and incentivise home owners to install water butts that collect the run off from their roofs in locations upstream of areas vulnerable to flooding.	Comment noted. Policy CC9 Water Efficiency requires that all new buildings to include rainwater harvesting appropriate to the scale of development. The Local Plan only applies where there is a planning application.	No change proposed.
Require utility companies to introduce SUDS materials when they dig up the roads. Allow home owners in conservation areas to install flood protection measures, such as flood doors.	Policy CC10 Flood Risk supports the retrofitting of flood resilience and flood resistance measures where they are in accordance with other policies. The Local Plan only applies where there is a planning application. The comment on sustainable drainage systems and utilities will be sent to the Lead Local Flood Authority.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There are some small errors in the SFRA 2024 • In 3.3.4 it states that the source of the River Tyburn is South Hampstead. This is incorrect, the source is Hampstead (Shepherd's Well) • In 5.4.7 it is stated that Counters Creek rises in Kensal Green which is in Kensington and Chelsea. It's actually in Brent. • In 5.2.13 it says that as stated in the Local Plan 2017 Thames Water identified that the south east of Camden discharges storm flow into the Counters Creek drainage catchment. We can't find anything that supports this in Thames' documents that analyse the issues in the Counters Creek drainage catchment.	We propose to provide an addendum to the SFRA on the source of the River Tyburn, and any name errors. The policies map will provide the area in Camden relating to the Counters Creek catchment.	Change proposed
In Figure 16 the South Hampstead area is called 'Goldhurst'. Request is made to change this to 'South Hampstead' as naming one road adds to the blight facing the people living in this road in terms of getting flood insurance and other issues.	The Local Flood Risk Zone 'Goldhurst' is an existing area, under the current Local Plan. While the majority of the Local Flood Risk Zone is within South Hampstead ward there are parts which extend beyond this boundary.	No change proposed.
Recommend the council commissions a new Surface Water Management Plan. This would highlight contaminated urban run-off, minimise volume of surface water entering the	The Surface Water Management Plan will be updated by the Lead Local Flood Authority and is not in scope of the Local Plan to update.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
sewers, and increase rainwater reuse. This would better inform policies and supporting text for CC9, CC12, NE4, and the area sections.		
Water Cycle Studies are noted as the recommended approach for understanding pressures on the sewers and demands on water supply. Such studies highlight opportunities for appropriate interventions (e.g.) SuDs. This would better inform policies and supporting text for CC9, CC12, NE4, and the Camden area sections.	A water cycle study was not considered necessary to inform the approach in the Local Plan at this time because the possibilities for a range of SuDs interventions are limited in the borough. Thames Water have also provided recommendations for site allocation policies on capacity. Furthermore, surface water flood risk has been considered in the SFRA, which has informed the policy approach.	No change proposed.
Strategic Flood Risk Assessment (SFRA) The primary source of flooding in Camden is surface water. No comments on the SFRA.	Noted.	No change proposed.
There may be opportunities in Camden to commission an Integrated Water Management Water Management Strategy to support the policy requirements, given the designation of Opportunity Areas for growth at Euston, Kings Cross, and Tottenham Court Road.	Draft site allocations have been reviewed in to identify potential flood risk and impact on water sources. Thames Water have also reviewed the sites proposed additional policy wording where needed. An Integrated Water Management Strategy is therefore not considered necessary at this time.	No change proposed.

CC11 - Sustainable Drainage

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
An increase in attenuation tanks in the north of the borough will be vital for holding back water during future storms. More emphasis could also be placed on drought, with installation of rainwater harvesting and greywater tanks.	Local flood interventions are not a matter for the Local Plan. We have passed this comment onto the Lead Local Flood Authority. Policy CC9 includes a requirement for all new development to include rainwater harvesting.	No change proposed.
Suggestion to include reference to maximising in point iv).	We propose to update the policy to include further emphasis on maximising urban greening.	Change proposed.
Support policy CC12.	Support welcomed.	No change proposed.
The requirement to reduce surface water run-off rates to greenfield run-off rates following the drainage hierarchy in the London Plan is supported It is not clear why this requirement is limited in the policy to major developments.	The draft policy requires all development to incorporate measures in line with the drainage hierarchy set out in the London Plan. The requirement for all major development to achieve greenfield runoff rate is in line with the NPPF. For applicants to demonstrate that a greenfield runoff rate has been achieved they must submit a Drainage report, which is not expected of more minor developments.	No change proposed.
Supporting text "Where it is not possible to achieve greenfield run-off rates, run-off rates should be as close to this as possible" should be included in the policy, and that the policy should require that the discharge rate does not exceed 2/l/s/ha as set out in DEFRA guidance.	The policy requirement is to meet greenfield run off rate, the supporting text provides further detail of how this be applied. Due to the nature of development in Camden it is not considered appropriate at this time to specify a discharge rate.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The Council should introduce more more Sustainable Urban Drainage Systems into open spaces upstream of the areas vulnerable to flooding/ Insist developments introduce significant numbers of trees and vegetation.	Sustainable drainage systems are a requirement for major planning applications. They can only be related to the site where the proposed development is taking place. The value of trees are noted in policies NE1 and NE3 on the protection of trees and the importance of securing additional trees.	No change proposed.
There does not appear to be any evidence base to support these figures. The figures should be written as targets rather than requirements. Part i is too prescriptive.	The Plan requires major developments to incorporate Sustainable Drainage Systems in line with the NPPF. The requirement to achieve a greenfield runoff rate for major development is consistent with the approach taken in the London Plan.	No change proposed.
Part i. is too prescriptive. It should also only apply to major developments.	We propose to amend the wording of the policy to "Development proposals should include permeable surfaces, incorporate green and blue roofs, and seek to replace non-permeable surfaces where feasible"	Change proposed
Pleased to see that the policy encourages infiltration SUDs. Suggest that the language be strengthened from 'the Council will expect…' to 'the Council will require…'	We propose to update the wording of this policy to state, 'Sustainable Drainage Systems should….'	Change proposed
Suggestion that the plan references CIRIA SuDS	The CIRIA SuDS manual is not a free accessible	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
manual (as utilised by the London Plan) and the London Sustainable Drainage Action Plan, and Camden Surface Water Management Plan.	resource and therefore we do not consider is appropriate to reference this. Furthermore, the London Sustainable Drainage Action Plan does not appear to add further detail that would be helpful in the application of the policy. Camden's Surface Water Management Plan has informed the SFRA and it is therefore not considered necessary to add a reference to it here.	
The use of infiltration SuDS is not appropriate on all sites and in all locations. Recommend that the following guidance be referenced: • The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13 • The CIRIA C753 SuDS Manual • The Susdrain website • The Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations to update these	Groundwater protection is covered in policy NE4 Water quality and we propose to update the supporting text to provide a cross reference to this. We propose to update the supporting text to make reference to Susdrain and non-statutory SuDs guidance. The CIRIA SuDS manual is not a free accessible resource and therefore we do not consider it appropriate to reference it here.	Change proposed
Draft Policy CC12 should relate to major developments only. The requirements are too prescriptive and should refer to adopting appropriate SUDs	We are proposing to amend the wording of the policy to "Development proposals should include permeable surfaces, incorporate green and blue roofs, and seek to	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
principles, rather than requiring specific measures.	replace non-permeable surfaces where feasible"	
This will be difficult for smaller applications to achieve permeable surfaces, and incorporate green and blue roofs.	We are proposing to amend the wording of the policy to "Development proposals should include permeable surfaces, incorporate green and blue roofs, and seek to replace non-permeable surfaces where feasible"	Change proposed.
If Camden wants to be aligned with the London Plan, then some flexibility should be allowed and should be an "aim" to achieve greenfield.	The policy is considered to be consistent with the approach taken in the London Plan. The emphasis is stronger due to the significant risk of surface water flooding within Camden.	No change proposed.
Part i. is too prescriptive and should be about referencing SuDs principles rather than requiring specific measures. It should also only apply to major developments	We are proposing to amend the wording of the policy to "Development proposals should include permeable surfaces, incorporate green and blue roofs, and seek to replace non-permeable surfaces where feasible"	Change proposed.

Chapter 9 - Delivering an Inclusive Economy

In total **177** general representations were made by **54** consultees. Of these,**9** representations were received via commonplace and **45** representations were received via email.

Responses were received from the following consultees:

- Apex Heights Offshore Inc
- Argent
- Bedford Estates
- Belsize Parkhill and Elsworthy Conservation Area Advisory Committee
- Birkbeck University of London
- British Land
- Camden Green Party
- Camden Town Unlimited
- Cockpit Arts
- Covent Garden Community Association
- Dominus

- Eton Conservation Advisory Committee
- Folgate Estates
- General Projects
- Greater London Authority
- Highgate Society
- Hogarth Properties
- Kentish Town Neighbourhood Forum
- Labtech
- Lazeri Investments
- Lendlease and Euston owners
- London Borough of Islington
- London Property Alliance / Great Portland Street / Royal London Asset Management
- LS Finchley Road Ltd
- Metropolitan Companies
- Network Rail
- NHS London Healthy Urban Development Unit
- Primrose Hill Conservation Area Advisory Committee
- Regal London
- Royal Mail Group 1 Barnby Street
- Royal Mail Group 24-86 Royal College Street
- Royal Veterinary College
- SEGRO
- Shaftesbury Capital
- Simten
- SLA Property Company Ltd
- Somers Town Neighbourhood Forum
- St George West London Ltd
- Tarmac Trading Ltd
- Tazzeta Ltd
- Transport for London
- Unite Group Plc
- University of London
- YC CFQ Ltd
- Members of the public

General Comments

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Encourage greater supply of visitor accommodation, e.g. Camden Town	New hotels and visitor accommodation are addressed by Policy IE5, and hotels are considered to be a suitable use in town centres (including Camden Town).	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Replace current benefits system with a Universal Basic Income	This is not a planning matter. Taxation and welfare policy is the responsibility of national government.	No change proposed.
Promote a wider range of uses in Kilburn High Road, not just gambling and hotels	Draft new Local Plan Policy IE6 - Supporting town centres and high streets sets out the approach to promoting successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. This applies to Kilburn High Road and other town centres. The Council is also working with local partners including Brent Council to support improvements to Kilburn Town Centre (see the One Kilburn Commonplace)	No change proposed.
Disappointed not to see more attention given to greening high street spaces.	These measures are promoted as part of The Natural Environment chapter and also the Local Plan's design (D1) and transport (T1) policies. These policies would apply to relevant sites within town centres and high streets.	No change proposed.
I think you should consider transportation planning and street design when thinking about high streets many high streets in Camden would be much more pleasant if they had fewer cars.	Comment noted. This matter is more closely related to Camden's Transport Strategy and the Local Plan's design (D1) and transport (T1) policies. A part pedestrianisation trial is being implemented in Camden Town.	No change proposed.
The quality of the environment would be greatly improved by not having one-way roads, particularly multi-lane	This is not a matter for the Local Plan. The Council is working with TfL to consider what improvements can be	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
ones. Camden High Street and Hawley Road are prime examples how any attempt of a more inclusive neighbourhood with high quality retail outlets are made impossible due to the lack of a coherent traffic strategy.	made. A pedestrianisation trial is being launched between Camden Town tube station and Jamestown Road/ Hawley Crescent	
Can the council include plans to encourage fast food shops (and all shops) to use sustainable and/or recyclable materials for their containers and carry bags.	The Local Plan cannot influence the packaging used in retail outlets.	No change proposed.
Support restrictions on gambling-related uses	Comment noted	No change proposed.
Strongly support the Council's approach to delivery-led food businesses	Support welcomed.	No change proposed.
Wish to see acknowledgement of the delivery of accessible commercial and office buildings in helping to deliver an "inclusive" economy. Welcome the position set out Chapter 12 at paragraph 12.81, in acknowledging the balance to be struck.	These matters are addressed through the Local Plan's Access for All policy	No change proposed.
Strongly support the principle of growing a strong, diverse and inclusive economy and enabling residents, businesses and the voluntary sector to share in the Borough's economic growth. Welcome support to ensure a continuing	Support welcomed	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
supply of employment development to deliver growth and innovation.		
Camden Collective can be the delivery partner where affordable workspace is required.	The Council's Inclusive Economy team would be involved where new affordable workspace is being considered. Colleagues within that service have established relationships with a range of potential providers including Camden Town Unlimited. These comments will also be passed to the Council's Inclusive Economy team.	No change proposed.
Request that the definition of commercial uses supported within Chapter 9 is broadened to incorporate hotel/visitor accommodation and other hospitality businesses, given the number of jobs generated by their operations, and their ability to accommodate working environments through meeting rooms, seminar halls and flexible working space. .	The Local Plan includes a policy relating to hotels and visitor accommodation. The NPPF also recognises that hotels are a suitable use within town centres. We don't however agree that hotels should be treated as a general business or commercial use since there can be impacts specific to this use (e.g. over-concentration of visitor accommodation in one area). They also tend to employ far fewer permanent full-time staff than equivalent floorspace in business use.	No change proposed.
Generally support Camden's approach which aligns with Islington's new Local Plan	Support welcomed.	No change proposed
Support recognition of the borough's significant research base and local strengths, including the number of businesses	Support welcomed. The Plan acknowledges the significance of the emerging Knowledge	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
engaged in technology and science. Further growth of Knowledge Quarter uses at Euston and King's Cross should be supported.	Quarter and the need to provide additional floorspace for these activities in an appropriate location (i.e. in proximity to/ within clusters of these uses). Further, some of the Local Plan's site allocations promote commercial uses which have the potential to support the growth of the Knowledge Quarter.	
Agree with the council's vision and context for its economic policies	Support welcomed	No change proposed
Evidence demonstrates the rapid growth in the number of knowledge activity enterprises that have located around the King's Cross, St Pancras and Euston Stations in recent years. This provides support for life science uses in the south of the borough.	Comment noted	No change proposed
We support the recognition in the Economic Needs Assessment to deliver Grade A space that reflects the needs of the current market.	Comment noted	No change proposed
The Economic Needs Assessment references the Science and Innovation audit, which noted a number of infrastructural and operational risks which need to be addressed when it comes to the supply of space for knowledge quarter uses. This provides further support for earlier arguments our position,	Comment noted. We have included additional text in the Inclusive Economy chapter acknowledging the particular challenges and opportunities faced by Knowledge Quarter Uses, particularly start ups	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
particularly where policy H2 provides conflict between competing land uses within the south of the borough.		
Town centres are not discussed in sufficient detail. Neither is a possible easing of rates for small independent businesses.	More detail about individual town centres is set out in Camden Planning Guidance. The Plan's area policies (S1, C1, W1 and N1) specifically refer to the town centres within each area. Business rates are not a matter that can be controlled through the Local Plan.	No change proposed

Policy IE1 - Growing a successful and inclusive economy

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Live/work space for SMEs should be promoted. Much commercial space is no longer intensively used, and local services are suffering as a result. More residents in central London is the answer.	The suggested approach is unlikely to be effective in central London where rental/sales values are very high. Further, many employment uses are now desk-based and could be undertaken from a home office/existing room.	No change proposed
Broadly support policy IE1. The University is a humanities focussed institution and therefore has limited requirement for lab space. Assertions should be based on recent evidence.	Support welcomed Comment noted. The Plan does not impose a requirement on institutions to provide lab space where this does not form part of a wider scheme	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The Agent of Change principle should be adopted to ensure lab space is appropriately located and doesn't adversely impact existing academic floorspace.	Impacts arising from labs would be considered under other relevant plan policies, e.g. odours from extracts is covered by Policy A3 Air Quality	No change proposed
Suggest adding to policy IE1 that the Council will use its planning powers to work with landlords to prioritise supporting tenants in high street and backstreet commercial premises, with an emphasis on fair rents.	The rents charged to existing tenants in high streets is not a matter for the Local Plan (except where secured specifically as 'affordable retail space' in conjunction with a scheme providing a large amount of additional retail floorspace).	No change proposed
Support the essence of Policy IE1, particularly on meanwhile uses. Suggest the policy supports changes of use from employment to other alternative uses where necessary to safeguard the viability of a site.	Support welcomed. The draft Plan sets out the Council's approach where it is demonstrated that there is no demand for existing employment uses. It is not considered appropriate to support changes to unspecified 'other alternative uses'	No change proposed
Where a loss of employment floorspace is proposed, financial contributions should be proportionate to the scale of development and subject to viability testing.	As set out in para 15.34, the Council will consider economic viability in considering planning obligations. No change is considered necessary.	No change proposed
As part of the marketing exercise, applicants should be required to consider rents of up to 10% below the minimum local market value	We normally expect applicants to consider benchmark average rents and to consider the use of incentives such as discounts (subject to viability). The planning system is not able to control rents (except where affordable	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	workspace is being created).	
Limit the proliferation of pubs in residential areas	We do not consider this change is necessary – there is no significant interest in opening new pubs in residential areas. If there were any such proposals, then impacts on neighbours/ the local area would need to be taken into account in line with other Local Plan policies	No change proposed
Due to individual site characteristics and the specific nature of a development, it might not be possible to provide a range of unit sizes	The Local Plan does not impose a requirement to provide a mix of sizes on every scheme; rather, it aims to ensure that there is sufficient diversity in the stock of accommodation across multiple development sites. Very large sites will have more scope to provide different unit sizes/ types of accommodation.	No change proposed
Support the requirement to provide affordable workspace within new developments, but the policy should be amended to reference 'subject to viability'	Policy IE4 on affordable workspace already includes consideration of viability. As set out in para 15.34, the Council will consider economic viability in considering planning obligations.	No change proposed
It is not the planning system's role to address the provision of childcare facilities or digital connectivity. These parts of the Policy should be deleted	The Council's intention is to encourage applicants to include childcare facilities where there is a legitimate need/demand from occupants of a building. Ensuring schemes include adequate digital connectivity is considered consistent with both	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	London and national planning policy.	
Where comprehensive development is promoted, this should override considerations about the loss of viable employment space	Identified sites in the Plan will be expected to deliver intensified employment opportunities alongside other uses such as housing. The London Plan and NPPF supports retaining employment land where it is viable to do so (having regard to market signals)	No change proposed
Support the objectives to maximise opportunities for the borough's businesses	Support welcomed	No change proposed
It is not the planning system's role to address the provision of childcare facilities or digital connectivity. These parts of the Policy should be deleted.	The Council's intention is to encourage applicants to include childcare facilities where there is a legitimate need/demand from occupants of a building. Ensuring schemes include adequate digital connectivity is considered consistent with both London and national planning policy.	No change proposed
It is not the planning system's role to address the provision of childcare facilities or digital connectivity. These parts of the Policy should be deleted.	The Council's intention is to encourage applicants to include childcare facilities where there is a legitimate need/demand from occupants of a building. Ensuring schemes include adequate digital connectivity is considered consistent with both London and national planning policy.	No change proposed
It is not the planning system's role to address the provision of childcare facilities or digital connectivity. These parts	The Council's intention is to encourage applicants to include childcare facilities where there is a legitimate need/demand	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
of the Policy should be deleted.	from occupants of a building. Ensuring schemes include adequate digital connectivity is considered consistent with both London and national planning policy.	
Support draft Policy IE1	Support welcomed	No change proposed
It is not the planning system's role to address the provision of childcare facilities or digital connectivity. These parts of the Policy should be deleted.	The Council's intention is to encourage applicants to include childcare facilities where there is a legitimate need/demand from occupants of a building. Ensuring schemes include adequate digital connectivity is considered consistent with both London and national planning policy.	No change proposed
It would seem appropriate for the supporting text to the policy to acknowledge that meanwhile activation of sites would be considered a developer contribution to public benefits.	Meanwhile uses are covered in policy IE1. Additional text is not considered necessary.	No change proposed
Welcome the support of draft Policy IE1 to secure a diverse and inclusive economy within the borough. In particular, we support the Council's recognition to prioritise the delivery of space for key growth sectors and research-based activities.	Support welcomed.	No change proposed

Policy IE2 – Offices

Summary of Key Points	Council's Response	Proposed Changes to the draft Local Plan
The University of London has a lot of existing	Any application for the conversion of educational	No change proposed

infrastructure (teaching/lecturing space etc) that is not fit for purpose. The policy and supporting text should be amended to cover ancillary office floorspace relating to educational facilities.	facilities would be considered against all relevant policies in the Plan, including Policy S3 and Policy SC2.	
Some of the university's estate is within outdated premises which are no longer fit for purpose and which would benefit from being converted to permanent self-contained housing. Floorspace associated with academic purposes should also be included as part of the use type that benefits from residential conversion.	Any application for the conversion of educational facilities would be considered against all relevant policies in the Plan, including Policy S3 and Policy SC2.	No change proposed
The requirement to consider discounted rent and rent-free periods contradicts with the need for the rent to be realistic. An owner of an office building is not going to invest in managing and maintaining an office use in a building where that office use is not financially viable and the tenant is only there on free or discounted rent. For Policy IE2 to meet the NPPF's 'justified' test of soundness, we suggest that criteria (b) and (c) of limb (i) should be deleted.	We believe it is justified and reasonable to consider reductions in rent subject to the outcome being that it is still viable to let the premises. The wording in the Local Plan does not imply that there should be no profit, only that a reduction in rent may be appropriate	No change proposed
Suggested that no set amount of marketing be required, and that this be re-worded to "appropriate marketing", to enable	Setting out a specified term for marketing is consistent with current practice in the adopted Camden Local Plan and is considered to be	No change proposed

sites to react more quickly to market conditions.	reasonable. A reference to 'appropriate marketing' would introduce unhelpful uncertainty in the application of the policy.	
An exception should be added to the wording of Policy IE2, which allows more flexibility to convert office floorspace within listed buildings.	A blanket exception for listed building is not considered appropriate. It would risk promoting the eviction of viable businesses from their accommodation as well as put pressure on rents of remaining premises in the area/Borough.	No change proposed
The requirements of Part C are considered to be too onerous and should be amended to include a more straightforward set of criteria based on the status of each asset rather than options testing of different levels of refurbishment and discounted rent options which are either unlikely to be deliverable and/or won't respond to the acknowledged need in the evidence to deliver the highest quality space.	We consider that the requirements set out in Part C are reasonable. The approach allows for developers to provide viability evidence to show that refurbishment for continuing office use is not possible. We believe it is justified and reasonable to consider reductions in rent subject to the outcome being that it is still viable to let the premises. The wording in the Local Plan does not imply that there should be no profit, only that a reduction in rent may be appropriate	No change proposed
Discounted rent and rent-free periods contradict the need for rent to be realistic. Building owners are not likely to invest in managing office tenants who are only there due to free or discounted rent.	We believe it is justified and reasonable to consider reductions in rent subject to the outcome being that it is still viable to let the premises. The wording in the Local Plan does not imply that there should be no profit, only that a reduction in rent may be appropriate	Change proposed

	These are not mandated but matters that should be considered as part of the marketing exercise. We will clarify in the policy text that this is subject to viability	
Discounted rents, incentives and flexible leasing arrangements should not be mandated by policy. It is not reasonable for landowners to invest in reconfiguring a building where there is a lack of demand for it and/or it is not fit for purpose. What is the justification for the affordable workspace policy	These are not mandated but matters that should be considered as part of the marketing exercise. We will clarify in the policy text that this is subject to viability The Council expects applicants to consider making changes to the layout/configuration of a building if this would increase its attractiveness to potential occupiers/ ability to be let. It is reasonable for the Council to expect applicants to explore reconfiguration to as a means of attracting tenants, and before demand can be assessed. Any such works would be subject to viability. The affordable workspace requirements are set out in full in Policy IE4 and have been tested as part of the Local Plan Viability Assessment	Change proposed No change proposed No change proposed
Refurbishing office buildings (e.g. to meet EPC ratings) may be prejudicial to the significance of listed buildings	The policy's text about marketing exercises does not override heritage and design policies in the Local Plan which will apply in relevant cases.	No change proposed

	The policy also does not override the Council's statutory obligations for listed buildings.	
The requirement to reproviding affordable workspace risks harming the significance of listed buildings	We don't agree that this approach would even in the majority of cases give rise to harm to a listed building. Nevertheless, the policies in the Inclusive Economy chapter would not override the Council's statutory obligations in relation to listed buildings.	No change proposed
Amendments are required to provide sufficient support and flexibility for a range of industrial uses to be delivered in response to market requirements. Policies should be justified, having regard to the Council's evidence base.	This issue is most relevant to the borough's largest industrial areas (Camley Street, Regis Road growth area and Murphys). These are subject to individual site allocations. The Regis Road and Murphys allocations seek the significant intensification of these sites to provide industrial and other employment uses. Murphys is a designated industry area and the allocation requires the industrial floorspace to be increased, or at least maintained. For the Camley Street sites light industry is identified as a suitable land use and the policies state there should be no net loss of employment floorspace. A variety of employment spaces is sought across 104, 108-114 Camley Street and 3-30 Cedar Way.	No change proposed
Support the need to manage the supply of offices in the borough and the approach to steer	Support welcomed. Comment noted.	No change proposed

office provision towards the Central Activities Zone ('CAZ') and other centres commensurate with their size and function. In addition to planned provision, it is reasonable to assume a continuing supply of 'windfall' schemes (i.e. additional sites becoming available for development beyond those already identified) to meet changing tenant requirements and the development of clusters.		
It would not be commercially viable to leave a property in Central London vacant for 12 months. Where appropriate, the Council should consider reducing the marketing period further to 6 months. Historic properties in and around Seven Dials which were once residential do not lend themselves to modern offices or tenants. The upgrading and retrofitting of these small buildings to meet the needs of commercial tenants can be costly and unviable. Greater flexibility should be given to site circumstances such as heritage assets, existing layouts, access arrangements, fire strategies etc.	We do not consider 6 months is a sufficient period for marketing especially during periods where there is significant fluctuation in the wider economic environment. The suitability of a property in terms of access to amenities or the configuration of a building would need to be tested through a marketing exercise. It would not be appropriate to automatically accept the loss of premises in these circumstances as individual occupier needs do vary. Where large scale interventions are needed in order to successfully relet a premises, we will consider the space being repurposed to provide housing.	No change proposed
Support the overarching aims of the policy to manage and protect the office stock in the borough to ensure that suitable and viable accommodation is	Support welcome	No change proposed

retained. Welcome specific support for ensuring a sufficient supply of space for research and development.		
Do not agree that discounted rent and incentives should be included within part C (b). This is not a planning matter and there is no justification.	These are not mandated but matters that should be considered as part of the marketing exercise. We will clarify in the policy text that this is subject to viability	Change proposed
Whilst it may be feasible to reconfigure office space, if there is a lack of demand, landowners are not going to spend money investing in a building which is not fit for purpose. Part C c) should be deleted.	We consider that Part C i) c) is reasonable: it is appropriate for reconfiguration to be explored as a means of attracting tenants, and before demand can be assessed. We will clarify in the policy text this is subject to viability.	Change proposed
If there is no demand for offices, then there is no demand for affordable workspace. Reference to the provision of affordable workspace should be deleted. If requirement for reprovision remains, policy should clarify the quantum required.	The policy approach recognises that while there may no longer be a demand for larger, outdated office premises, there may still be an unmet need for affordable workspace in an area which a mixed-use scheme may be able to help establish. The Borough's Affordable Workspace Strategy has been developed because there is not a sufficient supply of affordable workspace in Camden that start up businesses and entrepreneurs are able to afford. Certain sub-sectors such as some creative industries are also at risk of being squeezed out due to escalating operating costs.	No change proposed

Where a commercial building is outside of the CAZ and it can be demonstrated that it can no longer be used for commercial purposes, a residential-led scheme should be fast-tracked and promoted.	Where it can be demonstrated that a commercial building is no longer used for that use in line with the approach in IE2, residential would be the preferred use. We do not consider a fast-track approach is appropriate or justified. Any proposals will be assessed on its merits against all relevant Local Plan policies	No change proposed
Discounted rent and incentives should be included within the policy. This is not a planning matter and there is no justification. Landowners are not going to spend money investing in a building which is not fit for purpose	These are not mandated but matters that should be considered as part of the marketing exercise. We consider it is reasonable for reconfiguration to be explored as a means of attracting tenants, and before demand can be assessed. We will clarify in the policy text that this is subject to viability	Change proposed
Support the overall intentions of the policy, acknowledgement of the need for accommodation being retained to be suitable and viable, and the reduction of the marketing period.	Support welcome	No change proposed
It is not necessary or appropriate for planning policy to dictate that more than one marketing agent is used.	We consider this is a robust approach as sometimes agents may have significantly different expectations around the ability to let a premises and the rents that might be charged	No change proposed
Policy should request an up to date Commercial Market Assessment report in the first instance to establish if a full marketing campaign is necessary	A CMA would be insufficient in testing the demand for a particular premises and location as it would be reliant on general market indicators rather than the potential	No change proposed

The location, nature of the floorspace, targeted occupiers and many other factors affect the ability to offer incentives. Queries the viability of including discount rents and rent-free periods There is no need to say that marketing evidence should be provided to the Council's satisfaction – if it conforms with the policy, the policy's requirements will be met and the wording is superfluous	interest of occupiers in a particular premises. Agree, this is not mandated but something that should be considered as part of the marketing exercise. We will add reference to viability in this section The policy outlines the key expectations around marketing but there is further detail on how the marketing exercise should be conducted and what should be included in the marketing statement in our planning guidance. We find that sometimes marketing statements do not accord with the scope set out in the guidance and it is reasonable to expect all applicants to submit sufficient information as part of the marketing statement	Change proposed No change proposed
Support the overarching aims to manage and protect office stock in the Borough Protecting space which is suitable and viable is key whilst also recognising where demand is no longer there Reduction in the marketing period is welcome Discounted rents and incentives should not be included as this is not a planning matter	All these points have been addressed above	No change proposed

It is not reasonable to expect landowners to reconfigure a building because when there is no demand for the space/ the building is not fit for purpose References to premises that cannot lawfully be leased (due to EPC) are welcome If there is no demand for office accommodation, then there is likely no demand for affordable workspace		
Welcome the revisions of policy compared to current Local Plan policy E2, including to the marketing period as this assists in more agile decision making against the prevailing market conditions and will assist in maintaining occupancy and reducing void periods. References to a range of premises types and sizes should be applied with flexibility where the landowner has a wider portfolio of sites supporting different uses and end users. The text should clarify that Parts B and C are exclusive of each other, i.e. 12 months marketing is not required if a property cannot be lawfully leased	Comment welcomed The references in the policy to providing a range of premises types and sizes refers to the overall supply and delivery of new workspace in the Borough. Except for a small number of very large sites, it will not be a requirement for individual planning applications We consider that the supporting text already adequately addresses this matter. As there are flexibilities in the EPC regulations around payback periods/cost recovery (and exemptions	No change proposed No change proposed No change proposed

	for listed buildings), we do not believe this will result in offices becoming redundant in most cases	
Welcomes the Council's support and recognition to ensure a sufficient supply of space for research and development uses is delivered.	Support welcomed	No change proposed
Supports aims for additional office floorspace and refurbishment on sites/in areas mentioned	Noted	No change proposed

Policy IE3 – Industry

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
We support the broad intention to protect the supply of industrial and warehousing land, however we consider that this policy should be strengthened, and should identify an intention to meet identified needs. In our view this is necessary in order to ensure the policy is positively prepared in accordance with paragraph 35 of the NPPF. The Plan does not place sufficient weight on the need to plan for and support industrial development. It should set a target for industrial space using the demand-based scenario in the ENA (and taking account of backlog).	We do not consider it reasonable and practical to set a target for industrial space given the highly constrained nature of the Borough, lack of sites to provide additional capacity and the critical need for the Local Plan to demonstrate that the Borough is able to meet its housing target. The Local Plan therefore focusses upon safeguarding and intensifying existing sites rather than identifying new sites. The main opportunities to provide industrial space are on key employment locations identified as site allocations in the Local Plan. However, proposals for these sites could deliver either additional or qualitatively better space – it is not considered	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	possible to provide a definitive number/target as new and existing businesses will have a variety of different needs (and which may differ from the premises they currently occupy).	
The policy should also support the flexibility to use sites for different industrial uses in response to market demands. In particular, the ENA indicates a specific requirement for B8 uses, and consequently the policy should seek to actively support and plan for these uses.	Given that B8 uses tend to be space extensive / land hungry, we do not consider it appropriate to actively promote additional supply given the competing pressures on Camden's limited land and the need for the Plan to provide homes to meet substantial housing demand.	No change proposed
Whilst the site allocations identify a number of opportunities for intensification of existing industrial sites, there are no details within as to how much additional employment land is being planned for and whether identified needs will be met.	Site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.	No change proposed
Policy IE3 should be more explicit in its support for investment to modernise existing industrial sites and make them suitable	We consider that the policy already supports	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
to meet identified needs. It should actively support the conversion of existing industrial units to B8 to help meet need.	modernisation / refurbishment / intensification of industrial sites.	
The Plan is not clear on how the priority for housing should be considered alongside the priority for safeguarding industrial land. Site allocation policies should take precedence	The sites allocations element of the Local Plan identifies on which sites the intensification of employment/industrial uses is envisaged alongside provision of other land uses such as housing. These allocations have been guided by site capacity work which considered the ability of achieving the indicative housing target alongside provision of employment floorspace. The inclusive economy section of the Local Plan sets out the strategy for new employment floorspace and the types of benefits schemes will be expected to deliver for the local community. The Plan needs to be read as a whole and the inclusive economy section should be applied to all schemes involving employment floorspace as it sets the strategic objectives in relation to business/commercial land uses.	No change proposed
The policy should be more positive in relation to mixed-use intensification The policy should promote the creation of jobs across a range of flexible B use classes	The Local Plan supports the mixed use intensification of industrial sites where appropriate through its policy approach and site allocations, and is	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
rather than focussing on the reprovision of industrial uses	considered to be in line with the London Plan.	
The plan should prioritise the intensification of mixed use across industrial sites and job creation.	The Local Plan supports the mixed use intensification of industrial sites where appropriate through its policy approach and site allocations.	No change proposed
The requirement about the need to complete the employment element of mixed-use schemes at an early stage in the construction programme should be applied flexibly on strategic sites with long term phasing plans.	Policy IE3 C vi is expressed as a matter that applicants must have regard to, rather than a requirement. The Council will consider alternatives subject to reasonable justification, particularly if it can be demonstrated there is a significant impact on viability.	No change proposed
Welcome the aim of para 9.41 to reduce the footprint of distribution / logistics depots, which occupy about half of Camden's industrial land supply. Urges the Council to remove warehousing and instead focus on protecting the supply of industrial land	Support welcomed. The policy is intended to operate Borough wide. It is envisaged there will continue to be a need for some logistics/distribution uses in the Borough, particularly to serve Central London. Both national and London Plan policy seeks to ensure sufficient capacity for these activities. It is appreciated that some warehousing such as self-storage facilities may only employ limited numbers of people but the Council does not have the power to restrict certain types of commercial/industrial	No change proposed No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	uses (although it can resist individual proposals, e.g. due to their scale or impact on the area)	
Support the requirement for the development of existing industrial and warehousing land to form part of a comprehensive and intensified employment-led approach and the applicable requirements	Support welcomed.	No change proposed
Agree with acknowledgement of premises occupied by important local economy uses, including creative and cultural enterprises, and that industrial and warehousing land will be retained where it has an important local economic role. Encourage the protection of these specialist uses.	Comment noted.	No change proposed
The policy should be more positive in terms of promoting growth and maximising benefits through a mix of uses and refer to the need to balance the prioritisation of industrial/warehousing retention with other land use priorities, in particular residential. Policies appear to compete without much clarity on how the planning authority will apply the planning balance.	The Local Plan supports the mixed use intensification of industrial sites where appropriate through its policy approach and site allocations. The site allocations identify on which sites the intensification of employment/industrial uses is envisaged alongside provision of other land uses such as housing and an indicative housing figure is provided. These allocations have been guided by site capacity work which has considered the ability of	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	achieving the indicative housing target alongside provision of employment floorspace.	
The Policy should emphasise the need to promote the creation of jobs across a range of flexible E/B use classes rather than focussing on the re-provision of industrial uses. Flexible E/B uses have the potential to deliver greater social value/inclusive economy benefits	The approach to reprovision of industrial uses is considered to be in line with the London Plan. The draft Local Plan supports the significant intensification of key employment sites in the Borough which can provide for a range of different employment uses. The site allocations set out the types of land uses that would be acceptable for each site, including guidance on suitable types of employment uses.	No change proposed
Part C of Policy IE3 is in line with Policy E4 of the LP2021 which sets out the importance of having sufficient industrial uses due to their roles in supporting London's economy. The draft Plan should note the significance of its location in the Central Services Area (CSA) and recognise the need to provide essential services to the CAZ.	We propose to add reference to the CSA in the supporting text to Policy IE3	Change proposed
The draft Plan should be clearer on how much additional industrial land in LBC is required in order to meet demand in the borough over the plan period	We do not consider it reasonable and practical to set a target for industrial space given the highly constrained nature of the Borough, lack of sites to provide additional capacity and the critical need for the Local Plan to demonstrate that the	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	Borough is able to meet its housing target. The Local Plan therefore focusses upon safeguarding and intensifying existing sites rather than identifying new sites. The main opportunities to provide industrial space are on key employment locations identified as site allocations in the Local Plan. However, proposals for these sites could deliver either additional or qualitatively better space – it is not considered possible to provide a definitive number/target as new and existing businesses will have a variety of different needs (and which may differ from the premises they currently occupy).	
Site allocation C3 covers LBC's one designated Industrial Area. It should set out more detail on the amount of industrial space currently on site and the amount that would be expected post-development in order to maintain the area as a viable industrial location. Similarly, sites on Camley Street and Regis Road both provide significant industrial floorspace, including uses B8, which should be retained through co-location and because of LBC's location in the CSA.	Site allocation C3 sets a benchmark that development proposals should increase or at least maintain industrial, storage and warehousing capacity on this site. The allocations for sites on Camley Street and Regis Road are for mixed use intensification, including industrial uses. Proposals for these sites could deliver either additional or qualitatively better space – it is not considered possible to provide a definitive number/target as new and existing businesses will	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	have a variety of different needs (and which may differ from the premises they currently occupy).	
Welcome the Agent of Change principle in Draft Policy IE3 and consider its inclusion is necessary to protect important industrial sites such as King's Cross Concrete Plant.	Comment noted	No change proposed
We recommend that Policy IE3 recognise, that where a site is allocated, there should be flexibility around the loss of delivery offices and depots where the use can be more efficiently located elsewhere, and specifically have regard to the modern wave of knowledge-based sectors	The approach taken by the Local Plan is that industrial sites in the Borough could include distribution/logistics. The policy already makes clear there are exceptions involving some larger sites where site allocations set out the mix of uses we expect to see. In the Euston area, the Euston Area Plan will set the main parameters for key sites.	No change proposed
LBC should commit to producing a monitoring framework for industrial capacity in the borough which will help to inform decision making.	The Council collects information and reports on gains and losses of employment land through its Authority Monitoring Report.	No change proposed

Policy IE4 - Affordable Workspace

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There is no justifiable evidence to support the requirements and thresholds Assume the policy is seeking 20% of the uplift as affordable workspace	We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development. We propose to add reference to the 20%	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
not 20% of the gross. This requires clarification. 20% of floorspace to be provided as affordable workspace is a significantly greater requirement than in any other borough in London and we can see no evidence to justify the need for this quantum. 20% (even on the uplift in floorspace) is onerous and is unlikely to be viable or achievable.	floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes.	
A cascade from on-site provision to off-site provision and then a payment in lieu is welcome and if applied flexibly could deliver better outcomes in terms of the size, location and demand for affordable workspace. The policy should have regard to the specific requirements of the Knowledge Quarter within Camden and the acute shortage of incubator and accelerator spaces for the science and R&D sectors. It should recognise that the cost and specification to set up affordable lab space is significantly greater than for standard affordable workspace. Where full fit is required, this should be offset against the overall costs.	The policy already recognises that the "costs of delivery will vary" such as lab space. However, we will propose to add additional text recognising the particular costs of fitting out specialist types of premises.	Change proposed
Question the local need for affordable workspace. It should be made clear what the affordable	This information is provided in the Council's Affordable Workspace Strategy.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
workspace need is across LBC and what type of spaces are required.		
The proposed 20% affordable workspace floorspace requirement and 50% reduction in market rent is a significant financial burden for developers and there are concerns related to the viability of delivering affordable workspace under Policy IE4.	The Council has undertaken a viability assessment of the draft Local Plan which considers the cumulative impact of its policies. The Viability Assessment considered that the policy approach in IE4 is viable. We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes.	Change proposed
The price difference between providing Grade A office accommodation and existing grade space is over double. The policy needs to be flexibly	The affordable workspace % is intended to act as a working benchmark The policy is worded flexibly taking account of	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
applied as a 'one size fits all' approach will not suit all locations and will not deliver best value for Camden's communities and would fail to provide any additionality at a considerable cost to scheme viability. Use of late-stage viability reviews is overly onerous	site, location and the different types of workspace/affordable workspace being provided On further reflection, we are proposing to remove reference to late-stage viability reviews in this policy	
It is not clear whether this Policy is seeking 20% of the gross (total) or 20% of the uplift. Clarification is required.	We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development.	Change proposed
The most effective means of ensuring a long-term supply of affordable workspace accessible to local businesses is to plan for a sufficient supply of diverse employment spaces to meet identified needs. Welcome the exclusion of B2 and B8 uses from affordable workspace policy	Comment noted. Policy IE2 supports businesses and enterprises of all types and sizes for a variety of business activities	No change proposed
The evidence base does not demonstrate whether the policy is viable in relation to a non-mixed use light industrial scheme, and consequently we do not consider that the policy is justified or effective in this regard. Therefore consider that this element should be removed from	As there are very few sites on which non-mixed use light industrial space is expected to come forward, we do not consider this warrants specific testing in the Local Plan Viability Assessment. The approach taken in Policy IE4 is considered	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Policy IE4 in order to make the policy sound.	to be reasonable and appropriately justified.	
The targets should be expressly subject to viability. Support the degree of flexibility in part B but part A should recognise viability, other Local Plan policies and Camden Planning Guidance Unclear in what circumstances 'shell and core' might be acceptable	We have added reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow some flexibility as individual schemes come forward. All planning obligations would be subject to viability. Part B of the policy already acknowledges the need for schemes to be viable. The Plan has to be read as a whole Fitted out space is likely to be sought in most instances because this cost can have a significant bearing on whether premises are genuinely affordable for their targeted occupiers/sectors. Fully fitted is therefore the default. Shell and core may occasionally be more relevant for certain types of activity such as artists' studios.	Change proposed No change proposed
Welcome this policy	Support welcome	No change proposed
Agree with the principles of this policy. There will not be a one size fits all solution	Support welcome	No change proposed
There is no justifiable evidence base to support the requirements set out in Policy IE4.	The Council's Local Plan Viability Assessment has considered the cumulative impact on viability of the draft affordable	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The policy should only apply to the net additional floorspace not the gross floorspace. 20% of floorspace to be provided as affordable workspace is a significantly greater requirement than in any other borough in London and we can see no evidence to justify the need for this quantum. The policy needs to acknowledge the higher costs of delivering affordable workspace in knowledge based, lab schemes The policy should have regard to the specific requirements of the Knowledge Quarter within Camden. The higher costs and specific requirements for establishing affordable laboratory space, along with the unique skill set needed, warrant a sliding scale of provision to address these distinct challenges.	workspace policy alongside other potential developer contributions. The Council's Affordable Workspace Strategy also demonstrates that there is a need/demand for affordable workspace in the Borough. We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development. The policy wording recognises that "the costs of delivery will vary". However, we propose to add additional text recognising the particular costs of fitting out specialist types of premises. We consider that a sliding scale (additional to the one used for affordable housing) would introduce unnecessary complexity when the policy has been drafted to ensure it can operate on a flexible basis.	
There is no justifiable evidence base to support 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years. Unless this can be robustly justified, it should be deleted. If it can be justified, it is not clear whether this	The Council has undertaken a viability assessment of the draft Local Plan policies which considers the cumulative impact. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Policy is seeking 20% of the gross (total) or 20% of the uplift (net).	the relevant circumstances, e.g. type of space being provided and location. The Council's Affordable Workspace Strategy also demonstrates that there is a need/demand for affordable workspace in the Borough. We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development.	
Business rates, utilities and service charges should not be included in any AWS 'deal'. It is not for the planning system to subsidise the operation of the affordable workspace once it has been handed over to the operator.	We agree that the setting of business rates, utility bills and service charges are matters that sit outside of planning; however they do have a bearing on the ability of the Council to secure premises that would be genuinely affordable for targeted occupiers / sectors. It is therefore reasonable to take them into account when agreeing affordable workspace provision.	No change proposed
A late-stage viability review would be overly onerous and place a burden on schemes already struggling with viability. It should be deleted.	On further reflection, we are proposing to remove reference to late stage viability reviews in this policy	Change proposed
Policy should be based on net additional employment space	We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Part A (ii) should be treated as a starting point to enable detailed discussions on a case by case basis and not be rigidly applied.	We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes.	
There is no justifiable evidence base to support 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years and this should be deleted. The need for affordable workspace and the appropriate quantum should be considered on a site-by-site basis.	The Council has undertaken a viability assessment of the draft Local Plan policies which considers the cumulative impact. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location. The Council's Affordable Workspace Strategy also demonstrates that there is a need/demand for affordable workspace in the Borough. We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes.	Change proposed
One approach will not suit all locations and will not deliver best value for the community. The policy	The policy is considered to be sufficiently flexible to take account of issues such as location and local	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
should refer to local market need.	market need. No changes are considered necessary.	
The policy should make it clear that payments in lieu (PIL) will not be used to 'top-up' any shortfall against the 20% target. A PIL should only be collected where there is no provision of affordable workspace	The preference is for the affordable workspace to be provided on site. We do not consider that a mixed approach of direct provision plus PIL should be specifically excluded as this may be the best way of securing affordable workspace in some instances. Where the Council is satisfied that a reasonable affordable workspace offer is being made, no further PIL/ 'top-up' will be sought	No change proposed
A late-stage viability review would be overly onerous and place a burden on schemes already struggling with viability. It should be deleted.	On further reflection, we are proposing to remove reference to late stage viability reviews in this policy	Change proposed
In combination with other affordable contribution requirements, such as affordable housing, an affordable workspace requirement of 20% will affect the economic viability of development projects. The increased costs associated with the development of student housing is likely to have a number of negative implications such as higher rental levels and unviability.	The 20% figure is intended to provide a working benchmark. We propose to clarify this and also that it only applies to the uplift in floorspace and not to the gross floorspace of the development.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The affordable workspace contribution should be applied at 10%.		
Policy IE4 should be based on the additional floorspace being 'net' rather than 'gross'. The policy should be treated as a starting point to enable detailed discussions on a case by case basis, for example to consider specialist workspace, and not be rigidly applied.	We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development. We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes. The policy wording recognises that "the costs of delivery will vary". However, we propose to add additional text recognising the particular costs of fitting out specialist types of premises	Change proposed
There should be stronger wording to recognise the economic challenges developments face, such as viability. Request that the requirement for a late-stage viability review in the context of affordable workspace is removed, as this will significantly impact on developments coming forward	We propose to remove the requirement for late stage viability review	Change proposed
We have found the more flexible CPG approach to be a successful way of balancing the many competing requirements that affect the viability of a scheme.	We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	consideration of individual schemes Paragraph 37 of the CPG sets out examples of affordable workspace secured. The new draft policy would allow a similar range of types of workspace and levels of discount to come forward. Part B of the policy states: *"The Council recognises that different types of affordable workspace are needed depending on location and that the costs of delivery will vary. To ensure the opportunities arising from affordable workspace are optimised, the Council will consider a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers."* The policy's references to benchmarks and flexibilities builds in recognition of possible alternative approaches.	
Part A(ii) of the policy should be moved to the supporting text alongside other examples of how affordability can be defined, as per the CPG.	We consider the text should remain part of the main policy. We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There is no justifiable evidence base to support 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years. Unless this can be robustly justified, it should be deleted. It is not clear whether this Policy is seeking 20% of the gross (total) or 20% of the uplift (net). The cost of fit out between office and lab enabled space varies in cost. Therefore, a sliding scale should be introduced to reflect the needs of each site.	We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development. We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes. The Council has undertaken a viability assessment of the draft Local Plan policies which considers the cumulative impact. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location. The policy wording recognises that "the costs of delivery will vary". However, we propose to add additional text recognising the particular costs of fitting out specialist types of premises We consider that a sliding scale (additional to the one used for affordable housing) would introduce unnecessary complexity when the policy has been drafted to ensure it can operate on a flexible basis.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Remove the requirement for late-stage viability reviews.	We will propose to remove the requirement for late stage viability review as we have decided to any funding from this mechanism should prioritise affordable housing delivery	Change proposed
The Council should 'support' rather than "consider" a mix of affordable workspace provision as this gives more certainty for applicants. Part Aii should be caveated to enable provision to be viability tested and/or dependent on location	We propose to amend part B to replace "consider" with 'support'. We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes. The policy already acknowledges the impact of location and type of floorspace on viability. We will also add reference that the provision of affordable workspace is subject to viability	Change proposed
Support the requirement for development schemes to make contributions to affordable workspaces. The policy could go further by confirming (either within the policy or supporting text) that contributions will be made available to support institutions like Cockpit Arts.	Support welcomed. It is not considered appropriate to refer to specific organisations. Spending of contributions will be considered on a case by case basis and the Council's Inclusive Economy team would be involved in this.	No change proposed
The policy appears to read as though it is seeking 20% of the gross (total) floorspace. We assume that it is seeking 20% of the uplift in	We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
floorspace proposed. This should be clarified. There is no justification for seeking 20%. This is a significantly greater requirement than in any other borough in London and we can see no evidence to justify the need for this quantum. 20% (even on the uplift in floorspace) is onerous and is unlikely to be viable or achievable.	We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes.	
The introduction in Part A iii of the Policy of a cascade approach of on-site / off site provision / then payment-in-lieu is welcomed and we consider if applied flexibly could deliver much better outcomes in terms of overall provision of affordable workspace of the right size and in the right locations. A more flexible approach should be taken to laboratory development which acknowledges the cost and specification required to set up affordable laboratory space and the skills required to run such spaces is significantly greater than standard affordable office space.	Support welcomed The policy wording recognises that "the costs of delivery will vary". However, we propose to add additional text recognising the particular costs of fitting out specialist types of premises. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location.	Change proposed
Policy should take account of long term owners such as Bedford Estates allowing for a flexible balance of size and typology across a portfolio of commercial stock	We will consider this matter on a case-by-case basis and do not consider that a specific reference is needed	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
As currently drafted, we do not consider the policy and supporting text is rooted in published evidence. It must be underpinned by published evidence to justify it and made clear what the affordable workspace need is, what the deficit in space is, what type of space is required and what the qualification criteria are. There needs to be much more justification that the 50% discount is reasonable. There is a risk that without clear identification of local need, requirements for high proportions of affordable workspace with significant discounts could significantly impact segments of the B grade office market, This would negatively impact reuse of vacant spaces. Fully fitted out/grade A space would have a negative impact on viability/delivery especially when combined with other policy requirements.	The Council has undertaken a viability assessment of the draft Local Plan policies which considers the cumulative impact. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location. The Council has also published an Affordable Workspace Strategy which identifies the types of accommodation lacking in the Borough and the affordability challenge for start-ups and entrepreneurs. We propose to clarify that the 20% only applies to the uplift in floorspace. It will therefore not impact on vacant buildings.	Change proposed
Late-stage viability reviews would add complexity, uncertainty and challenge, especially mixed-use schemes with high upfront and enabling costs.	We propose to remove the reference to late stage viability review.	Change proposed
It is not clear in the policy or supporting text whether a lower percentage could be delivered onsite, with	A mix of on and off site provision and a payment lieu may be appropriate in certain cases such as	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
the payment in lieu making up the shortfall against the 20% target.	highly constrained sites. However, the preference would be for all of the affordable workspace to be delivered within a scheme. We propose to make reference in the supporting text to the acceptability of a mixed approach combining provision and payments.	
Assume the 20% would apply to the uplift in commercial floorspace, rather than the total amount proposed. This should be clarified	We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development.	Change proposed
There is no justifiable evidence base to support 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years. Unless this can be robustly justified, it should be deleted. If it can be justified, it is not clear whether this Policy is seeking 20% of the gross (total) or 20% of the uplift (net). Clear guidance should be provided on suitable level of service charges Late-stage viability reviews seem overly onerous and would place further burden on developments that are already struggling with viability.	We propose to clarify that the 20% only applies to the uplift in floorspace and not to the gross floorspace of the development. We propose to add reference to the 20% floorspace target at a 50% discount being a "working benchmark" which should allow flexibility in the consideration of individual schemes. The Council has undertaken a viability assessment of the draft Local Plan policies which considers the cumulative impact. The policy makes clear that different schemes may provide different amounts of affordable workspace having considered all of the relevant circumstances, e.g. type of space being provided and location	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	The level of service charges is a matter already addressed by Camden Planning Guidance on Employment Sites and Business Premises, i.e. they should be *"reasonable and proportionate, to ensure that these do not undermine affordability"* (para. 40) We propose to remove the requirement for late stage viability review.	
Welcome the flexible approach taken by Policy IE4 and recommend a similar flexible approach should be applied to Policy IE3.	All of the policies in this chapter are intended to form a flexible approach. With regards to large industrial/logistic sites the parameters for development will be set by individual site allocations, or in the Euston Area by the Euston Area Plan	No change proposed
We seek clarification as to the hierarchy used to secure affordable workspace, particularly if Camden requires evidence to demonstrate affordable workspace cannot be provided on-site or off-site, in order to satisfy the acceptable of a payment in lieu.	Generally the policy expects provision on site. However, we will clarify where off-site or a payment-in-lieu (PIL) may be acceptable, e.g. having regard to the supply (of affordable workspace) and planning permissions in the area or where Council considers that a better employment outcome would arise from a payment-in-lieu	Change proposed

Policy IE5 - Hotels and visitor accommodation

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Hotels should be an acceptable use at Murphys site	The Murphy site lies within is a designated Industry Area. It sits well outside a town centre and has constrained access. It is not a sequentially preferable site for a new hotel.	No change proposed
It would be useful for the Council to define what it means by 'large-scale', 'medium scale' and 'small-scale'.	We propose to clarify that larger hotels are considered to be 2,500sqm or more GEA, which is considered to be broadly equivalent to 100 additional hotel rooms.	Change proposed
There is no legislative basis or other caselaw that suggests visitor accommodation is intended for a period of less than 90 days. There is a need for visitor accommodation that allows people to stay there for longer than 90 days	We consider the definition of hotels/visitor accommodation to be reasonable. Stays of 90 days and longer can readily be accommodated by taking out a tenancy agreement or part (or all) of a private dwelling.	No change proposed
Part (A) (i) and (ii) should be amalgamated so large-scale hotels are be supported in Camden Town and other Town centres given the huge demand and Camden Town's important role in the night time economy.	We consider that the approach to the location of large scale hotels is appropriate and reasonable, reflecting the character of areas and their suitability for large scale schemes.	No change proposed
Traditional office buildings given their size and locations, could be highly suitable for hospitality businesses and visitor accommodation which also provides significant employment generating business. Policy should provide support for contemporary	The policy seeks to resist the change of use of viable office spaces recognising that they will invariably have higher employment densities than hotels. This is considered to be an appropriate and reasonable approach. We propose, however, to	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
and flexible facilities combining a range of employment generating uses with retail, hospitality, events space, co-working facilities.	acknowledge the role of new formats blending a range of employment and hotel uses.	
There is currently no definition of large, medium or small-scale hotels.	We proposed to clarify that larger hotels are considered to be 2,500sqm or more GEA, which is considered to be broadly equivalent to 100 additional hotel rooms.	Change proposed
The current Local Plan also provides policy support for facilities with a local or specialist focus outside of centres. This flexibility should be included.	The criterion in the adopted Local Plan relates to "tourist development" such as museums and galleries. It is not intended to refer to visitor accommodation. The draft Local Plan refers to commercial/mixed use areas and named town centres as the preferred location for new visitor accommodation. Where alternative locations are being proposed, we will apply the sequential test in line with the NPPF	No change proposed
Part (A) (i) and (ii) should be amalgamated so large-scale hotels are be supported in Camden Town and other Town centres given the huge demand and Camden Town's important role in the night time economy.	We consider that the approach to the location of large scale hotels is appropriate and reasonable, reflecting the character of areas and their suitability for large scale schemes.	No change proposed
There is currently no definition of large, medium or small-scale hotels.	We proposed to clarify that larger hotels are considered to be 2,500sqm or more GEA, which is considered to be broadly equivalent to 100 additional hotel rooms.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The current Local Plan also provides policy support for facilities with a local or specialist focus outside of centres	The criterion in the adopted Local Plan relates to "tourist development" such as museums and galleries. It is not intended to refer to visitor accommodation. The draft Local Plan refers to commercial/mixed use areas and named town centres as the preferred location for new visitor accommodation. Where alternative locations are being proposed, we will apply the sequential test in line with the NPPF	No change proposed
Part (A) (i) and (ii) should be amalgamated so large-scale hotels are be supported in Camden Town and other Town centres given the huge demand and Camden Town's important role in the night time economy	We consider that the approach to the location of large scale hotels is appropriate and reasonable, reflecting the character of areas and their suitability for large scale schemes. years, typical size of sites	No change proposed

Policy IE6 - Supporting town centres and high streets

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Policy should promote greening	These matters are dealt with through the relevant sub area policies (e.g. by identifying key green infrastructure opportunities). The Local Plan promotes use of green roofs and greening	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	of development sites, e.g. Policies D1, N1 and T1	
Residents and visitors have differing needs. Camden must strike a balance for all key stakeholders including those providing resources for maintenance and management of the area	Comment noted. The Council routinely seeks operational management plans where they are required in line with the Local Plan's policies on amenity.	No change proposed
Pay attention to the impact of licensed premises and have a planning strategy for the location of new venues etc. Planning should have conditions on operational hour of premises as this can have a huge impact on residents amenity.	Policy IE6 sets out that the Council will ensure that new development, including entertainment uses, is of an appropriate type, scale and character for the centre in which it is located. Further, it acknowledges that these uses are focussed on parts of the Central Activities Zone and Camden Town centre. Consequently, new licensed premises will generally be supported based on this approach. The Local Plan's noise policy includes how we control hours of operation	No change proposed
There has been a loss of shops and stalls in neighbourhood centres and markets that support local residents in recent years, including places that sell affordable fruit, veg, meat, fish and bread. This impacts on residents' diets and their health and wellbeing. Other vital services such as Post Offices are also being lost. The Council should prioritise these uses.	We are generally not able to control the specific businesses operating out of retail units or market stalls. However, we have sought small and affordable accommodation as part of large major schemes, such as the 02 development. The Local Plan also supports the role of community food growing projects.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Designate Steele's Village, Haverstock Hill as a neighbourhood centre.	We propose to designate Steele's Village / Haverstock Hill South as a neighbourhood centre.	Change proposed
Policy IE6 xi. should cross-reference the design policy on historic shopfronts	Reference to policy D8 in policy IE6 xi is not considered necessary. Proposals will be assessed against all relevant plan policies.	No change proposed
Request for additional text acknowledging the link between night time uses and impacts on residential amenity	Proposals will be assessed against all relevant plan policies. Potential impacts are addressed by draft new Local Plan Policy A1, A2 and A4.	No change proposed
Smaller non-designated parades should be designated	We are proposing to designate Haverstock Hill South/ Steele's Village as a new neighbourhood centre and extend the existing neighbourhood centre at Belsize Lane. A new neighbourhood centre is also proposed along King's Cross Road	Change proposed
Protection of "essential" shops outside of designated centres is too high a bar, should refer to shops with a 'valued role'	We consider the existing wording is appropriate and there would be no material benefit from making the change suggested	No change proposed
Welcome the policy statement in para 9.91 on protection of ground floor uses	Support welcomed	No change proposed
Please add additional retail clusters as neighbourhood centres in Primrose Hill. They include highly valued shops and services and draw in visitors.	We have reviewed the proposed changes to designations in Primrose Hill and consider that the main areas of shopping and service uses have been identified. However, we propose to extend the existing boundary for Regent's Park Road	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	neighbourhood centre to include 138 Gloucester Road and The Queen's public house at 49 Regent's Park Road.	
Shop windows should be kept clear of excessive advertisements and particularly film which may cover a large percentage of the shop front window. This disrupts the vitality of the high street and reduces the interaction between the street and commercial units	This matter is addressed by Draft New Local Plan Policy D8 Shopfronts (e.g. paragraph 12.146)	No change proposed
There is no justifiable basis or evidence of market failure to support the requirement to include a proportion of smaller units and therefore it should be removed. It is not clear if the policy relates to all commercial schemes over 2,500sqm or only where retail space will be in excess of 2,500sqm.	The policy approach is considered reasonable and is similar to that taken in the current adopted Camden Local Plan. We proposed to clarify that smaller units will be sought where proposals are located within a shopping frontage. The policy will be applied flexibly and may not appropriate for every scheme. The policy is intended to address schemes delivering in excess of 2,500sqm of retail floorspace	Change proposed
Consider transportation planning and street design when thinking about high streets. Many high streets in Camden would be much more pleasant if they had fewer cars.	Comment noted. This matter is addressed by Policy IE6 A (xiii): Supporting town centres and high streets and paragraph 9.99	No change proposed
The Interchange site should be included within the town centre boundary	The Interchange building is not an established part of the town centre and is	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
for Camden Town within the emerging Local Plan to enable a broader range of town centre uses to be considered for the site: town centre related uses were previously approved by LBC at this site The Interchange sits within the Camden Goods Yard area which highlights the importance of considering the area's opportunities and challenges in a coordinated and holistic way, including this site. The site will help to support the surrounding planned growth including site allocations	used currently as offices. We do not consider it should be included as part of Camden Town Centre at the current time.	
Agree that active ground floor uses should be retained within the Borough's centres. Further clarification is sought on what uses are considered to be an "active use".	The Local Plan says these are "considered uses visited by members of the public and related to the role of the designated centre".	No change proposed
Planning conditions have been applied to restrict ground floor uses to restaurant or retail uses only under Class E. Further relaxation of the policy wording is sought to enable a wide mix of uses, and that greater flexibility is given to other uses to recognise that retail and food and beverage uses alone are insufficient to support the local economy in these centres.	Planning conditions are applied sparingly where there considered to be a particular need based on the character and function of a centre. Policy IE6 iii allows for "other cultural, community, leisure and service-oriented uses where they positively contribute to the character and role of the centre in which they are located". Further relaxation of the policy wording is not considered necessary.	No change proposed
It is not clear if the policy relates to all commercial	The policy is intended to address schemes	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
schemes over 2,500sqm or only where retail space will be in excess of 2,500sqm. There is no justifiable evidence base to support the requirement to include a proportion of smaller units and therefore it should be removed.	delivering in excess of 2,500sqm of retail floorspace The policy approach is considered reasonable and is similar to that taken in the current adopted Camden Local Plan. We proposed to clarify that smaller units will be sought where proposals are located within a shopping frontage. The policy will be applied flexibly and may not appropriate for every scheme.	
The reference to "floorspace available at a discount to market rents" should be removed. This should be location and market specific and considered on a site-by-site basis.	The Council intends this to apply this flexibly but we propose to add reference in the policy to the suitability of the location and need. We consider that the approach to space at discounted rents is reasonable. It is most likely to be achievable/deliverable on the largest schemes and could contribute towards the provision of affordable workspace in line with Policy IE4.	Change proposed
The requirement to provide a proportion of smaller units including floorspace at a discount to market rents raises concerns. There should be an explicit reference to these being subject to viability. There might be both design and financial implications for why it might not be possible to incorporate this.	The Council intends this to apply this flexibly but we propose to add reference in the policy to the suitability of the location and need. We consider that the approach to space at discounted rents is reasonable. It is most likely to be achievable/deliverable on the largest schemes and	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	could contribute towards the provision of affordable workspace in line with Policy IE4. The Council will have regard to any design constraints or viability issues on a case-by-case basis	
We strongly support part viii of the policy which seeks to widen the range of evening and night-time economy uses.	Support welcome	No change proposed
It is not clear if the policy relates to all commercial schemes over 2,500sqm or only where retail space will be in excess of 2,500sqm. There is no justifiable evidence base to support the requirement to include a proportion of smaller units and therefore it should be removed.	The policy is intended to address schemes delivering in excess of 2,500sqm of retail floorspace The policy approach is considered reasonable and is similar to that taken in the current adopted Camden Local Plan. The policy will be applied flexibly and may not appropriate for every scheme, e.g. there is already a supply of smaller units in the centre or there are particular issues of vacancy	Change proposed
It is not clear if the policy relates to all commercial schemes over 2,500sqm or only where retail space will be in excess of 2,500sqm. There is no justifiable evidence base to support the requirement to include a proportion of smaller units and therefore it should be removed.	The policy is intended to address schemes delivering in excess of 2,500sqm of retail floorspace The policy approach is considered reasonable and is similar to that taken in the current adopted Camden Local Plan. The policy will be applied flexibly and may not appropriate for every scheme, e.g. there is	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	already a supply of smaller units in the centre or there are particular issues of vacancy	
Highgate High Street and the shopping parade on Swains Lane are Neighbourhood Centres but not marked up on the map. Reference to a Policies Map which we could not find	Swain's Lane neighbourhood centre is shown as a purple dot at Map 11 in the Draft New Local Plan At the next stage (Regulation 19), the Council will publish a revised Plan and Policies Map which will show centre boundaries (and any proposed changes to centres). We are proposing minor changes to Swain's Lane and Highgate High Street neighbourhood centres	Change proposed
Add reference to coordinating with neighbouring local authorities for town and neighbourhood centres that straddle neighbouring boroughs to ensure a joined up approach and support for the whole centre.	We acknowledge there could be cross-boundary matters of relevance and propose to make reference in Policy IE6.	Change proposed
Support Coal Drops Yard and King's Boulevard being located within the CAZ Retail Cluster. However, it is not absolutely clear Map 11 as to the extent of the area within the CAZ Retail Clusters	At the next stage of plan preparation Regulation 19), we will publish a revised Policies Map. This will provide greater clarity regarding the boundaries for the areas mentioned.	Change proposed
Would like to discuss if it is proposed to define 'primary shopping areas'	We are not proposing to take forward any new primary shopping	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
for Coal Drops Yard and King's Boulevard.	area/frontage designations.	

Policy IE7 - Hot food takeaways

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Fast food takeaways should use sustainable forms of packaging	The Local Plan cannot to influence the packaging used in retail outlets.	No change proposed
The prevalence of junk food outlets contradicts the objective of increasing healthy diets, makes Camden unattractive, causes littering and supports unsustainable food industries.	Comment noted.	No change proposed
Commend the inclusion of a policy to restrict the location of Hot Food Takeaways close to schools. Supply above the 2022 baseline needs to be monitored Further guidance should be given as to what consists of 'healthier menu options' and how this can be demonstrated	Support welcome. The Council undertakes regular retail surveys which monitor changes in land uses. Menu options can be considered as part of the HIA process. It is not considered appropriate for the plan to contain detail on healthier menu options.	No change proposed
Need to be clear that 400m is by shortest route on foot	Text amended to be clear this is a 'walking distance'	Change proposed
Childhood obesity is not a planning matter. The requirement for a hot food take away application to provide a Health Impact Assessment to assess health needs in 'the area' is unreasonable, costly and unjustified. This policy should be deleted.	We consider control of hot food takeaways to be a legitimate planning matter. Our approach is in general conformity with Policy E9 of the adopted London Plan. We do not consider the approach for HIAs to be unreasonable, costly or unjustified.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Add a paragraph identifying the potential links between hot food takeaway and crime/ASB	This matter is already addressed by Policy A2 of the Draft New Local Plan dealing with Safety and Security. Proposals for hot food takeaways will be assessed against policies IE7 and A2, and all other relevant policies.	No change proposed

Policy IE8 – Gambling uses

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Welcome the policy to limit the overconcentration of gambling uses	Support welcome	No change proposed
Concerned with the lack of definition relating to the term 'Gambling Uses' and the impact this could have on the night-time economy. A blanket ban on the term gambling would fail to protect night-time venues and spaces. Many of the family entertainment uses within Camden Markets do have elements of gambling.	The policy is not trying to deal with uses for family entertainment with an element of gambling (which would likely be ancillary) but premises where gambling would be the main focus	No change proposed
Omit the phrase 'adult gaming centre' which allow for a more diverse night-time economy,	Adult gambling centres can be a cause of gambling–related harm. We consider the reference should remain	No change proposed
Welcome the commitment to resist new gambling-related uses in Kentish Town	Support welcome	No change proposed

Policy IE9 - Delivery-led food businesses ('dark kitchens')

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support the principle of delivery-led food businesses only being approved where there will be no unacceptable adverse impacts on neighbours or the local area.	Support welcome	No change proposed
Should not be a blanket restriction on proximity to residential, rather there should be a technical assessment based upon specific proposals. The text presupposes that any delivery-led food business activity would inevitably have an unduly harmful impact on the amenity of nearby residents The requirement in the supporting text for promoters of such facilities to have undertaken a borough-wide search is also based on an assumption that there will inevitably be a level of harm, rather than assessing individual proposals based on the specific facts of the case. The supporting text at paragraph 9.113 should be deleted	Individual proposals would be assessed on their merits against policy IE9 and other relevant policies and mitigation measures secured in line with predicted impacts. We have removed text that may have inferred that any scheme would automatically harm residential amenity.	Change proposed
Strongly support the requirements that vehicle movements are minimised, and sustainable transport practices are adopted. Would also support travel plans and using planning conditions to restrict deliveries from being	Support welcome	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
made by moped or motorcycle		
Research on how dark kitchens impact on the supply of takeaway / unhealthy food choices should be undertaken Similar limits on this use should be applied to those for hot food takeaways, make use of the 2022 baseline, insist on healthier menu options etc	We propose to add a reference to the health issues arising from takeaway food and expect promoters of new delivery-led food businesses to undertake an HIA to assess healthy food options.	Change proposed
Urge the Council to strengthen the provisions in Policy IE9 to set limits on the number of vehicle movements and hours of operation, and also to restrict the number of new dark kitchens setting up in close proximity to each other.	We propose to refer to the impacts caused by over-concentration of such uses. Limiting vehicle movements / hours of operation is already covered by the policy	Change proposed

Policy IE10 – Markets

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There has been a loss of shops and stalls in neighbourhood centres and markets that support local residents in recent years, including places that sell affordable fruit, veg, meat, fish and bread. This impacts on residents' diets and their health and wellbeing.	We are generally not able to control the specific businesses operating out of retail units or market stalls. We have acknowledged in the markets policy the potential for schemes to improve the local community's access to	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Other vital services such as Post Offices are also being lost. The Council should prioritise these uses.	essential goods and services, this is most likely to apply to large developments. The Local Plan also supports the role of community food growing projects.	
Challenge the requirement to provide discounted market stall floorspace. The policy fails to acknowledge the difference in market retail rents compared to traditional retail spaces. Market spaces are less risk to run. There is no evidence to support the level of discount to benchmark rents.	The policy is seeking to encourage a diversity of market stalls and spaces and at a range of rents. Similar to other commercial/employment uses, tenants requirements will vary between businesses starting out for the first time and more experienced and established traders. We propose to more clearly set out the intended outcomes and remove reference to the targets used in the affordable workspace policy.	Change proposed

Chapter 10 - Supporting Camden's Communities

In total **102** representations were made on the Supporting Communities Chapter. Of these, **4** representations were received via commonplace and **98** representations were received via email.

Responses were received from the following consultees:

- Bloomsbury Conservation Area Advisory Committee
- British Museum
- Covent Garden Community Association
- Campaign to Protect Rural England (CPRE)
- Camden Town Unlimited (CTU)

- Dartmouth Park Neighbourhood Forum (DPNF)
- Eton Conservation Area Advisory Committee
- Folgate Estates
- Highgate Society
- Hilson Moran
- Historic England
- Kentish Town Neighbourhood Forum (KTNF)
- Lendlease and Euston landowners
- London Property Alliance
- LS Finchley Road Ltd
- Network Rail
- NHS Healthy Urban Development Unit (HUDU)
- NHS Property Services
- Primrose Hill Conservation Area Advisory Committee
- Regal London
- Royal Free London NHS Foundation Trust
- Somers Town Neighbourhood Forum (STNF)
- Sport England
- St George West London Ltd
- Students' Union UCL
- Theatres Trust
- University College London (UCL)
- Woodland Trust
- Members of the public

Policy SC1 - Improving health and wellbeing

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The inclusion of policy SC1 to improve the health and wellbeing of Camden's residents is strongly supported. Suggested amendments to the wording of elements of Part Bi, and vi.	We propose to update the wording of policy SC1 Criteria Bi to replace the word 'promote' with 'support'. We have updated the policy to refer to the use of developer contributions and NHS requirements. The proposed amendment to criterion Bi as suggested is not considered appropriate.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Strong support for Health Impacts Assessment requirements in policy SC1. Suggest the policy is refined to reflect the potential adverse impacts of development and opportunities to improve health and wellbeing. Criteria should be set out for different types of HIA. Add reference to monitoring health outcomes and securing through S106 and conditions.	Support welcomed. The policy makes it clear that Health Impact Assessments must be undertaken for all major applications, non-major applications that the Council considers would have the potential to give rise to significant adverse health impacts and for non-major applications involving sensitive uses. We propose to update the policy to state that recommendations made in a Health Impact Assessment will be secured by planning condition.	Change proposed
Welcomes that the ICB would be consulted on proposals for public health care buildings and that contributions will be required. There is general support for consultation on public health care buildings and that contributions will be required. The HUDU model should be applied to major schemes of 50+ homes and HUDU consulted.	Support welcomed. The supporting text to Policy SC1 Improving Health and Wellbeing already refers to the fact that the Council and NHS partners will use the NHS London Healthy Urban Development Unit's Planning Contributions Model to assess the health service requirements and cost impacts of new residential developments. We propose to add the following wording after this "…we will also expect applicants to liaise with NHS partners early on in the design process to identify what mitigation is required in particular circumstances."	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support the inclusion of a policy on health and wellbeing, and the requirement for Health Impact Assessments. Encourage further engagement with the NHS	Support welcomed.	No change proposed
WELL Building Standard is not a planning requirement and should be deleted.	We propose to remove the reference to the WELL Building Standard from policy SC1.	Change proposed
A holistic and sustainable approach to wellbeing is important and facilities supporting this should be encouraged.	Comment noted.	No change proposed
WELL Building Standard is not a planning requirement and should be deleted.	We propose to remove the reference to the WELL Building Standard from policy SC1.	Change proposed
Suggested additional bullet point for SC1 para 10.6 to say: "Protecting the rights of residents to have a good night's sleep and other opportunities to rest and relax in their homes."	This matter is covered under Plan policy A1 (Protecting Amenity) and policy A4 (Noise and Vibration). No change to the wording of paragraph 10.6 is considered necessary.	No change proposed
Not clear what the Council is expecting regarding WELL Building certification.	We propose to remove the reference to the WELL Building Standard from policy SC1.	Change proposed
WELL Building Standard is expensive and may not be realistic for all developments.	We propose to remove the reference to the WELL Building Standard from policy SC1.	Change proposed
Why are refurbished buildings excluded from these requirements? The idea is to improve resident's health & wellbeing, isn't?	Policy SC1 states that Health Impact Assessments must be undertaken for all major applications, non-major applications that the	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	Council considers would have the potential to give rise to significant adverse health impacts and for non-major applications involving sensitive uses. If a building refurbishment scheme required planning application and fell into one of these categories then an HIA would be required.	
It is not clear how the WELL building standard would be demonstrated for some developments.	We propose to remove the reference to the WELL Building Standard from policy SC1.,	Change proposed
Support the aspirations of Policy SC1 to improve the physical and mental health and wellbeing of all people who live, work in, study in and visit Camden.	Support welcomed.	No change proposed

Policy SC2 - Social and community infrastructure

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There is a need for storage space in Somers Town. We would like to see existing spaces better utilised and, if possible, new spaces created.	Policy SC2 supports the provision of new, improved and extended social and community infrastructure.	No change proposed
Welcome the policy seeks contributions when there would be additional demand.	Support welcomed.	No change proposed
Would welcome early consultation on, involvement in, updating the Infrastructure Delivery Plan.	Comment noted.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
It is supported that there is an ambition to co-locate community facilities to help sustain and improve access to them. In addition, community facilities could be delivered as part of a mixed used development.	Support welcomed.	No change proposed
We support the provision of sufficient, quality community facilities and the wording of the Policy that requires one of the two tests to be met. The NHS requires flexibility with regards to the use of its estate.	Support welcomed.	No change proposed
Propose adding text to say: Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will satisfy Policy SC2 Part D(i)(a) and there will be no requirement to retain any part of the site in an alternative community use.	It is not considered necessary or appropriate to add specific wording relating to the NHS or any other organisation. Whether a particular health or other facility is considered to be surplus to requirements it will be assessed in accordance with the policy criteria and applications will be considered on a case by case basis.	No change proposed
Support for policy SC2. However, the policy for cultural facilities does not include protection of existing uses.	Support welcomed. We are proposing to amend policy SC5 to cover the protection of cultural uses.	Change proposed
Welcome the principles of the policy. Part C viii) does not acknowledge the difficulties associated with	Support welcomed. Part C viii seeks to ensure funding arrangements are secured for the future	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
funding social infrastructure and this should be considered when determining whether the provision of facilities is appropriate.	maintenance and management of social and community infrastructure. It is not considered necessary or appropriate to make reference to funding difficulties in the policy. The approach to planning obligations and viability is set out in the supporting text to the policy in para 10.23.	
There are parallels with the policies in the Dartmouth Park Neighbourhood Plan.	Comments noted.	No change proposed
Welcome the policy to protect existing social and community infrastructure but concerned with the part stating that where existing premises are deemed no longer required, the preferred alternative is affordable housing. We wish to prevent loss of community facilities.	Part B of Policy SC2 seeks to safeguard social and community infrastructure. There will, however, be circumstances where premises are no longer required in their existing use and there is no alternative social or community use capable of meeting the needs of the local area. It is reasonable and appropriate for the Council to set out its preferred alternative use where this is the case.	No change proposed
Welcomes recognition of need for public toilets and their protection.	Support welcomed.	No change proposed
Broad support for principle of policy geared towards ensuring development and delivery of modern social and community infrastructure facilities.	General support welcomed	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Policy SC2 fails to recognise that the loss of facilities may be acceptable where proposals form part of a wider estate rationalisation / improvement strategy. It therefore does not accord with London Plan Policy S1 (Developing London's Social Infrastructure).	Policy SC2 would allow for the loss of a facility where it can be demonstrated that it it is no longer required or is replaced through a wider public sector estate programme. Therefore, no change is considered necessary. We consider the policy to be in general conformity with the London Plan. The GLA's response to the draft Plan did not raise any conformity issues with this policy.	No change proposed
Concerns regarding existing lack of public toilets and associated consequences. Adequate signage to toilets should be provided.	Comments noted.	No change proposed
Concerns over difficulties in ability to demonstrate funding arrangements in place. More information may be needed in the plan or guidance.	Comments noted. Further information on the operation of the policy is set out in para 10.34. When we update the Council's Camden Planning Guidance on community uses, we will consider whether further guidance is required.	No change proposed
SC2 part D i a) Should be amended to make it clear that a replacement facility should be provided, to accord with NPPF para103.	We propose to update the policy to take on board these comments and ensure it aligns with the NPPF.	Change proposed
SC2 part D i b) does not accord with NPPF para103.	We propose to update the policy to take on board these comments and ensure it aligns with the NPPF.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support for policies in relation to inclusive environments.	Support welcomed.	No change proposed
Support reference to the provision of public toilets. However, request consideration of suitable mix of public toilet provisions based on gender and for facilities to be free. Also, request map of accessible public facilities separate to the plan.	Support welcomed. Policy SC2 supports the provision of free, publicly accessible toilets in social and community infrastructure. We also propose to update the Plan to include a policy aimed at delivering access for all. This policy states that the Council will ensure that water fountains and free publicly accessible toilets suitable for a range of users, including d/Deaf, disabled and blind people are provided, where appropriate, in new or enhanced open spaces and public places.	Change proposed
It is positive to see educational uses prioritised within the Bloomsbury campus area, but certain buildings may be more appropriate for alternative land uses than educational use. Policy SC2 part D and policy S3 should provide flexibility in such situations.	It is considered that the draft plan contains sufficient flexibility to respond to potential scenarios of the like mentioned in the comment.	No change proposed
Flexibility should be given for temporary uses for education.	It is not considered appropriate to add wording to provide flexibility specific to higher education institutions.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Surprised that UCL is not listed alongside schools and private providers. Could be a potential funding partner for new sports facilities.	Comment noted.	No change proposed
There are a number of facilities specifically reserved for children. Would like to see University students to be included	It is appropriate to provide specific facilities for children. The operation of such facilities is not a matter for the Local Plan.	No change proposed
The Council should review the quality of its facilities and identify funding for maintenance.	The maintenance of existing facilities is not a matter for the local plan.	No change proposed
Welcome the inclusion of neurodiverse community in the policy. Propose that neurodiversity is included earlier in the section and clearly defined to form an integral part of 'Diversity', 'accessibility' and 'inclusivity' requirements.	Support welcome. We are proposing to include a new access for all policy in the next version of the Local Plan to ensure that development in Camden in designed to meet the needs of all Camden's residents and visitors, including the d/Deaf and disabled community, and would also to include the whole spectrum of neurodiversity.	Change proposed
Recommend the Council provides further support for the Camden Highline. There is a need for access to open space. The Highline will become focal point for the local community and provide jobs. Spending CIL or Section 106 funds towards delivery would be justified.	Policies S1 South Camden and C1 Central Camden set out a number of infrastructure priorities for the South and Central areas of the borough, including the delivery of the Camden Highline (see S1 Infrastructure part S, ix, and C1 Infrastructure part O xi).	No change Proposed

Policy SC3 - Open Space

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Plan focuses on enhancing public green space but does not protect privately owned green spaces in Bloomsbury. Need to protect green/ wildlife corridors of privately owned gardens in the area.	Chapter 11 of the new draft plan: The Natural Environment includes policy NE1 part A i) which specifically references the biodiversity value of wildlife corridors and the Council's intention to safeguard them. Point v) states, we will protect non-designated spaces with nature conservation, townscape and amenity value, including gardens. Policy NE2 Part A vii) recognises the biodiversity value offered by gardens.	No change proposed
Protecting open space is vital. New open spaces should be created, and existing spaces enhanced. It would be advisable to work with the Open Space Society.	Comment noted	No change proposed
2014 Open Space, Sports and Recreation Study is inadequate for the Euston Area and should be updated. Open spaces have been lost since then. Spaces that require a payment to be used should be identified, as most are unaffordable to local people.	The Euston area is covered by the Euston Area Plan, which the Council are currently updating. The Policies Map will be updated to reflect changes in open space.	No change proposed
Support contributions for improved estate open space, but object to conversion of estate spaces to public open space provision with dense population usage.	The ongoing management of open spaces on estates is not a matter for the Local Plan. Where there are development proposals policy SC3 B. ii. would apply. Among other things this considers whether open space is replaced by	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	equivalent or better provision in terms of quantity, quality and accessibility for residents.	
Widened pavements and improved public realm in Somers Town are supported but should not be instead of new parks.	Comment noted	No change proposed
Concerns regarding the private management of public spaces in terms of surveillance and accessibility.	Comment noted. We are proposing to update the policy to refer to the need for open spaces to be managed in accordance with the principles set out in the Mayor's Public London Charter.	No change proposed
Support for protection of public and private open space and land on housing estates. Green and play space on estates open spaces should be protected as Town/Village Greens or Local Green Spaces.	Support welcomed. Town/ Village Greens are not designated through the Local Plan, they are dealt with under a separate process. However draft policy NE1 supports communities seeking the designation of Local Green Space through the neighbourhood planning process.	No change proposed
Support for requirements to contribute to the provision of public open space	Support welcomed	No change proposed
The Plan should have a policy to create street parks in Areas of Deficiency.	The draft Local Plan contains transport policies to support the delivery of the Council's Transport Strategy. This supports general improvements to the public realm, part of which could relate to pocket parks and greening of routes to increase biodiversity	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	through connected wildlife corridors.	
Urge the importance of supporting the protection of green open space throughout the Borough. Open space has ecological value but also a key role in supporting a local sense of place and belonging shared by a range of age-groups.	Comment noted. Policy SC3 seeks to protect open spaces.	No change proposed
Strongly endorse the policy to conserve and enhance the heritage value of designated open spaces.	Support welcomed	No change proposed
Dartmouth Park Neighbourhood Plan contains policies on open space and enhancing sense of place.	Comment noted	No change proposed
Sources of funding need to be found to assist with the long-term maintenance of spaces. Spaces enhanced ideally should be linked to community need, and grass roots and local initiatives and partnerships to ensure continued use and relevance.	Comment noted	No change proposed
Support policy SC3, particularly Di c) and e).	Support welcomed	No change proposed
Suggested amendment to policy SC3 D i) c to include explicit reference to the emerging Local Nature Recovery Strategy,	The Local Nature Recovery Strategy is referenced in the Natural Environment policy (NE1). It is therefore not considered necessary to add a reference to this	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	into the open space policy.	
Additional flexibility should be written into Policy SC3 to recognise that making improvements to existing open space off-site could be a mechanism to offset open space/play space/food growing requirements onsite where onsite space is constrained. Without flexibility policy requirements may undermine ability to maximise land receipts and fund the HS2 station.	Policy SC3 Part C iii allows for contributions to deliver improvements to existing public open space using Section 106 agreements where an applicant can demonstrate to the Council's satisfaction that it is not feasible to provide public open space on-site, or off-site, in accordance with criteria (Cii).	No change proposed
Would like to see tighter control of 'temporary' incursion of events on public open spaces	Comment noted. The use of open spaces for events is not a planning matter. We have shared this comment with the relevant Council service.	No change proposed
There needs to be a balance between operational requirements and open space to meet policy expectations at Euston.	Comment noted	No change proposed
Concerns that para 10.47 seeks to re-write definition of open space in NPPF Annex 2.	Para 10.27 sets out types of open space but is clear that this is not intended to be an exhaustive list. It does not seek to rewrite, and is not considered to be contrary to, NPPF Annex 2.	No change proposed
Concern that the definition of public open space in SC3 and the open space map may not identify all sports facilities which require protection	As set out in para 10.49 Camden's open space designations include outdoor sports provision, including playing fields and ancillary facilities,	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
from development (e.g. playing fields, MUGAs)	which the Council will seek to protect, maintain and enhance.	
Policy SC3 should be reviewed to ensure that all sport and recreation facilities are protected from development regardless of whether they are in public or private ownership and ensure that the policy and the supporting text aligns with national and regional policy. For example, Policy SC3 (B) (vi) also does not accord with national policy (NPPF Paragraph 103) or London Plan Policy S5	We propose to amend policy SC3 to ensure it is consistent with the NPPF.	Change proposed
Support for the intention of Policy SC3 part D, but query whether all the criteria can be met on one piece of public open space. It is suggested that the policy applies to new areas of open space or a criteria is used so that minor developments are not captured by the policy.	Support welcomed. As set out in Policy SC3 Part D, the criteria listed are sought "where appropriate" so it is not expected that all developments meet all criteria.	No change proposed
Para 10.57 should be removed as it contradicts NPPF para103 and London Plan policy S5 C.	We propose to remove para 10.57 to take on board these comments.	Change proposed
Concerns regarding paragraph 10.64. It is good that the Borough intends to seek some provision for outdoor sports facilities but the evidence base is not	With regards to the evidence base, there has been little change in sports facility provision in Camden since the 2014 open space, sport and play study was	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
considered to be up to date. Also need to consider how development contributes to new indoor sports facilities.	undertaken. Given this, it is considered that this study continues to provide a helpful baseline. We propose to prepare an Open Space, Sports and Play Topic Paper for examination however, setting out any changes to the baseline since the 2014 study was completed. In terms of planning for new sports facilities, the Council are intending to publish an Infrastructure Delivery Plan alongside the Regulation 19 Local Plan. This will set out planned delivery of new and improvements to existing sports facilities over the Plan period.	
The Camden Open Space, Sports and Recreation Study (2014) is over 10 years old and should not be used to inform the new Local Plan. It is recommended that the Council undertakes a new assessment to determine what is needed in the Borough to support new provision and how this will be delivered.	With regards to the evidence base, there has been little change in sports facility provision in Camden since the 2014 open space, sport and play study was undertaken. Given this, it is considered that this study continues to provide a helpful baseline. We propose to prepare an Open Space, Sports and Play Topic Paper for examination however, setting out any changes to the baseline since the 2014 study was completed.	No change proposed
Appreciated that the approach required for sports facilities strategies requires adaptation given	Comment noted.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
that the urban nature of the borough. Would welcome the opportunity to discuss.		
Request to alter text so that there is no implication that maintaining or increasing the monetary value of a park is in itself desirable, with suggested new wording.	Comment noted. The reference to value should not be taken to refer to monetary value. The Council seeks to maintain the value of these spaces in the widest sense, e.g. including in terms of their use and benefit to the community, not just historic value. It is not considered necessary to amend the wording.	No change proposed
Support for policies protecting open space. Suggest additional text about reduction and paving over of gardens and erection of "garden rooms".	Support welcomed. The open space policy refers to public open spaces and as such, installation of hardstanding to gardens, the erection of garden rooms and flood risk are covered elsewhere, namely in Policy NE1 The Natural Environment and Policy T5 Car free development. Policy D5 Heritage would also apply to development in conservation areas and where applications have the potential to impact on a designated heritage asset.	No change proposed
Support for policy SC3.	Support welcomed.	No change proposed
Support the requirement for developments to provide new and enhanced public open space. Suggest 'where possible' is added into Part D.	The suggested wording is not considered necessary. Part D i. specifies that new and enhanced open space will be sought 'where appropriate'.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Policy SC3 part B - request for explicit reference to registered parks and gardens rather than conflation with other open spaces. This would reflect the NPPF. Suggested Change: An assessment of wider character, including an understanding of heritage assets where relevant.	Policy D5 (Heritage) specifically refers to protection Registered Parks and Gardens. Further reference in Policy SC3 is not considered necessary.	No change proposed
Where open space is provided off-site; suggest some metric for determining how far from site is suitable/ acceptable.	This would be considered on a case by case basis. Providing a standard range is not considered appropriate or practical.	No change proposed
Clarify what is and what isn't open space. Consider grading scale for type of open space i.e.) park better than pavement. SuDS (unusable) areas should not be included as open space.	No change considered to be needed in the draft plan, although to be considered when Camden Planning Guidance is updated.	No change proposed
Suggestion to part re-word SC3 B iv) "permit" or "consider" rather than "support"	We have updated Policy SC3 Criteria B iv to replace the word 'support' with 'consider'.	Change proposed
Recommended commitment to public consultation on issues relating to public space.	Comment noted. The management of existing open spaces is a matter for the Council's open space team and other relevant landowners and is not a matter for the local plan. Public consultation is carried out on planning applications that would affect open space.	No change proposed

Policy SC4 - Food Growing

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The policy should be reconsidered and Strongly oppose forcing developers to jump through more hoops when Camden is in the middle of a housing crisis. Allocating land to hobby gardens means less of it is available for housing.	The policy supports the delivery of the Council's food mission, which aims to ensure that everyone in Camden eats well every day with nutritious, affordable and sustainable food. We are proposing to remove reference to 0.9sqm per person provision, with space for food growing sought as part of overall open space provision. It is not considered that the policy would impact on housing delivery.	Change proposed
Support the policy. Suggest some amended wording A. ii. to strengthen the policy	Support welcomed. Whilst this policy is designed to support food growing and community food growing in Camden to ensure that residents have access to nutritious, affordable and sustainable food, it has been worded flexibly, so as not to impact on the delivery of development in Camden. Given this no change to wording is considered necessary.	No change proposed
Request clarification whether the 0.9sqm space requirement is included within the overall open space requirement, rather than representing as an additional requirement. If this is the case, additional wording is suggested. If this would be an additional requirement, is	We are proposing to remove reference to 0.9sqm per person provision, with space for food growing sought as part of overall open space provision.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
the policy provision supported by evidence that there is likely to be capacity on developments? Would be helpful to clarify to how this would be prioritised, relative to general open space provision/ public realm etc?		
Support policy SC4.	Support welcomed.	No change proposed
The requirement of 0.9 sqm on site per person for onsite food growing opportunities is likely to be highly onerous for strategic sites with a number of competing requirements. This policy should therefore be applied flexibly and reductions accepted where justified, and in the context of the holistic provision of open and community spaces.	We are proposing to remove reference to 0.9sqm per person provision, with space for food growing sought as part of overall open space provision. It is considered that sufficient flexibility has been built into the policy and its application will respond to individual circumstances.	No change proposed
The Council's aspirations for on-site food growing are acknowledged. However, considering the challenge in achieving the existing policy requirements for open space and play space, a further requirement will act as a financial burden and obstacle to delivery of housing. The management of these facilities also pose significant challenges. The Council should use funds from schemes deficient in open space to help fund either existing allotments or new allotments, within the	We are proposing to remove reference to 0.9sqm per person provision, with space for food growing sought as part of overall open space provision. It is not considered that the policy would impact on housing delivery.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Borough, rather than requiring on-site food growing space.		
Principle of food growing is supported; however this is not a planning requirement and should be removed or should become a part of policy SC3 (Open Space).	We are proposing to remove reference to 0.9sqm per person provision, with space for food growing sought as part of overall open space provision.	Change proposed
This is a welcome addition.	Support welcomed	No change proposed
Clarification required as to whether 0.9sqm per person is in addition to open space policy requirement or part of it.	We are proposing to remove reference to 0.9sqm per person provision, with space for food growing sought as part of overall open space provision.	Change proposed
This will place additional pressure on the space required to contribute to open space/play space. Policy SC4 does not draw upon any published evidence to qualify its inclusion.	We are proposing to remove reference to 0.9sqm per person provision, with space for food growing sought as part of overall open space provision.	Change proposed
Reference to food growing is only mentioned in terms of community growing, we would welcome additional emphasis on enabling sustainable, nutritious and low-carbon food growing.	The policy supports the delivery of the Council's food mission, which aims to ensure that everyone in Camden eats well every day with nutritious, affordable and sustainable food. Although there is a particular focus on community growing, the policy states that the Council "will support food growing and community food growing."	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Applaud your support of rooftop farming	Support welcomed.	No change proposed

Policy SC5 - Cultural facilities

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
We need to continue supporting local communities and have more open access to facilities. Pay for this with Land Value dividend and a waste tax.	Comment noted. A land value dividend and waste tax are beyond the scope of the local plan.	No change proposed
Welcome the policy. The facilities identified should include libraries and community centres.	Support welcomed. We propose to update the supporting text to make it clear that libraries are also considered to be cultural facilities.	Change proposed
Welcomes the support provided to cultural facilities in the policy. It should also protect cultural uses from loss.	Support welcomed. We are proposing to amend the policy to cover the protection of cultural uses.	Change proposed
New developments offer opportunities for more cultural facilities to be created.	Comment noted.	No change proposed
Add reference in para 10.86 to unsocial hours of operation".	This will be covered by policy A1 (Protecting Amenity) and A4 (Noise and Vibration). However, we propose to update the policy to state that large-scale facilities should be located in the Central Activities Zone or Camden Town provided any impact on amenity is	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	mitigated in accordance with Policy A1 Protecting Amenity; and that smaller facilities would be appropriate anywhere in the Borough provided they do not have an adverse impact on their neighbours, the surrounding area or the local community. This includes demonstrating to the Council's satisfaction that any impacts on the highways network or public transport would be acceptable. The hours of operation of a premises will be controlled by the Council's licencing team, rather than the Local Plan.	
Support the policy	Support welcomed	No change proposed

Policy SC6 - Public Houses

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The policy is supported, particularly for seeking to protect such facilities from loss.	Support welcomed.	No change proposed
We welcome this policy	Support welcomed.	No change proposed
We support our local pubs, and would strongly resist conversion of pubs to private use.	Comment noted.	No change proposed
Suggested additional wording at SC6 part F to	The existing wording is considered sufficient. It is	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
say … "The Council will support the provision of new public houses of community value in appropriate sites."	not considered possible to accurately assess the community value of a new public house within a new development. The actual community value an establishment may offer is generally built up over time, and this is why the Council seeks to protect these premises as per policy SC6 Part A.	

Chapter 11 - The Natural Environment

In total **71** representations were made on the Natural Environment Chapter. Of these, **7** representations were received via commonplace and **64** representations were received via email.

Responses were received from the following consultees:

- Argent
- Bedford Estates
- Belsize Parkhill and Elsworthy Conservation Area Advisory Committee
- British Museum
- Camden Green Party
- Camden Town Unlimited
- Campaign to Protect Rural England
- Canal and River Trust
- Dartmouth Park Neighbourhood Forum
- Environment Agency
- Eton Conservation Area Advisory Committee
- Heath and Hampstead Society
- Highgate Conservation Advisory Committee
- Highgate Society
- Hilson Moran
- Heath and Hampstead Society
- Kentish Town Neighbourhood Forum
- Primrose Hill Conservation Area Advisory Committee
- St George West London Ltd
- Waterlow Park Trust Advisory Group
- Woodland Trust
- Members of the public

General Comments

Summary of Comments	Council's Response	Proposed Changes to the draft Local Plan
Hedgehog highways: promote the community's work towards creating hedgehog corridors and state a preference for hedges and/or open fencing over solid walls and fencing	While it is not considered appropriate to add reference to the specific project in the Plan, we propose to amend the wording to identify the benefits of hedges and open fencing over solid walls and fences for species movement and from reinstating permeable boundaries such as hedges.	Change proposed.
Add reference in the Plan to Camden Highline due to its benefits in improving green space, biodiversity and bringing a disused piece of infrastructure back into use	We propose to add reference to the Highline as a strategic green link. It is also mentioned as a key infrastructure project in the Local Plan policies for the Central and South sub areas.	Change proposed.
Plan should be more ambitious about creating new parks and green spaces.	The Local Plan's Open Space Policy sets out how the Council seeks to secure new and enhanced public open space but this is quite challenging given the built up nature of the Borough.	No change proposed
Plan needs to be clearer about the importance of front and back gardens for nature and flood management	We propose adding additional text regarding the value provided by gardens and undeveloped land in terms of biodiversity and drainage. Policy CC11 on Sustainable Drainage also addresses this matter.	Change proposed.
Raises concerns about anti-social behaviour issues at Camden Gardens	The management of open spaces is not a matter for the Local Plan. We have passed the comment onto the Council's Greenspaces team	No change proposed
Identify derelict green sites and disused playing	Gondar Gardens is already a designated	No change proposed

Summary of Comments	Council's Response	Proposed Changes to the draft Local Plan
fields for use as green infrastructure assets (e.g. Gondar Gardens and railway sidings)	SINC. We are not aware of derelict/unused playing fields and green sites in the Borough suitable for designation as suggested. A significant proportion of Camden's rail sides are already designated as SINCs	
Front and back garden vegetation/ natural surfaces should be protected including with TPOs for trees	We propose adding additional text regarding the value provided by gardens and undeveloped land in terms of biodiversity and drainage. Policy CC11 on Sustainable Drainage also addresses this matter. Tree protection and planting is already addressed by Policy NE3	Change proposed
Emphasise the importance/role of mature planting/trees. Concerns about frequency of events using open spaces	Comments noted. The management of open spaces is not a matter for the Local Plan. We have passed the comment onto the Council's Greenspaces team	No change proposed
Refers to management/maintenance issues, including reduced mowing to encourage wildlife.	We propose to add reference to use of suitable mowing regimes for wildflower areas and have also passed the comment onto the Council's Greenspaces team	Change proposed to refer to the impact of mowing on the ability to sustain areas of wildflowers
Should be 'more appropriate' tree planting, i.e. not too large species as can undermine nearby houses	Where tree planting is proposed, the Council has regard to the size of the tree upon maturity as well as potential constraints to its growth (e.g. from buildings)	No change proposed
Resist 'disproportionate' losses of garden space, not "excessive".	We will discourage garden buildings that would result in these impacts (however in many	Change proposed

Summary of Comments	Council's Response	Proposed Changes to the draft Local Plan
Insist on small sized garden buildings constructed with lightweight materials and maximising retention of topsoil	cases permitted development rights apply) and propose to refer to numbers/size of garden structures, use of materials and retention of topsoil. We propose to replace the word excessive with disproportionate as this better reflects the importance of retaining sufficient garden space.	
Emphasise the particular importance of gardens on the fringes of the Heath for biodiversity	The importance of gardens bordering the Heath is already acknowledged in the Local Plan, e.g. Policy NE1	No change proposed
Bedford Hotel Grounds designated open space does not include land owned by the Bedford Hotel. It is owned by Bedford Estate. It is privately accessible and at ground level serves no purpose. It is not a high quality or particularly valuable open space and does not offer any wider public or societal benefit. It should be de-designated as open space to allow "creative analysis" of its future. The site could be developed or used in a way that preserves the open character of the centre of the street block.	The Council considers this open space to have significant townscape value and therefore we do not propose to de-designate it. We propose to amend the name of the site.	Change proposed
Promote and support the development of green corridors with stepping stones	We propose to add reference to the provision of strategic wildlife corridors in Kentish Town,	Change proposed

Summary of Comments	Council's Response	Proposed Changes to the draft Local Plan
	ie. Heath Line and Camden Green Corridor to reflect emerging proposals to strengthen strategic green links in the Borough. The value of 'stepping stones' is already addressed by Policy NE1	
Provide guidance on suitable choices of plants, bushes and trees	Policy NE3 on Tree Planting and Protection and Camden Planning Guidance on Trees set out considerations that should guide tree planting. The plant and shrub species used in gardens/soft landscaping is outside of the control of the local plan / planning system.	No change proposed
The Canal and River Trust may be able to help facilitate off-site biodiversity units Planning applications that include land within 10m of a watercourse will need to be accompanied by an assessment of the baseline condition of the watercourse and deliver a 10% net gain in watercourse biodiversity units.	We have passed on the comments about watercourse biodiversity units to our Development Management service.	No change proposed
Promote pre-application discussion with the Canal and River Trust.	We propose to include reference to consultation with the Canal and River Trust for developments in proximity to the Regent's Canal.	Change proposed
Statutory guidance on Local Nature Recovery Networks directs local authorities to include designated wildlife sites however opportunities for enhancing the canal and	The comments about the Local Nature Recovery Strategy / associated consultation and engagement have been passed onto the Council's	No change proposed

Summary of Comments	Council's Response	Proposed Changes to the draft Local Plan
river network can be missed. Therefore, Canal and River Trust should be added to the Local Nature Recovery Strategy consultation database	Nature Conservation Officer	
Reference should be made to the protection of churchyards	We protect churchyards through open space and nature conservation designations. The introduction of the Plan's nature conservation section mentions that churchyards are one type of open space found in Camden	No change proposed
Why do the Site Allocations not include any proposals for Local Green Space designation? This is an essential part of ensuring the health and wellbeing of residents, improving the quality of the environment and tackling climate change. Where in the plan is there an option for residents to suggests sites for open green spaces? How can we protect our local green spaces?	The Plan's site allocations identify sites where significant development is expected to take place and sets out the Council's aspirations for their development. This includes provision of open space where appropriate. However, it is not the role of site allocations to protect open spaces. Open spaces, local green spaces and sites for nature conservation are identified and protected through designations on the Local Plan Policies Map and policies SC4 and NE1 and NE2, rather than site allocations. There was an opportunity to suggest new Local Green Spaces as part of a Local Plan 'Call for Sites' in 2023.	No change proposed
Restrict impermeable surfaces and promote greater use of SUDS	Policy CC11 of the Local Plan resists proposals including impermeable surfacing unless it can be demonstrated to the	No change proposed

Summary of Comments	Council's Response	Proposed Changes to the draft Local Plan
	Council's satisfaction that this is unavoidable and requires all major development to reduce surface water run off rates to greenfield run-off rates, by using Sustainable Drainage Systems	

Policy NE1 - The Natural Environment

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Afford greater protection for trees in conservation areas	Policy D5 of the Local Plan says that the Council will preserve trees and garden spaces which contribute to the character and appearance of a conservation area, or which provide a setting for Camden's architectural heritage. Where works are proposed to a non TPO tree in a conservation area, the Council must be formally notified. The CAAC is able to obtain information about all tree applications by signing up to the Council's Planning Alerts service.	No change proposed
The Forum welcomes reference to the protection of local green spaces and protecting undeveloped areas such as gardens. The Forum also agrees it is important to safeguard key open spaces, important views and glimpses of green space and increase opportunities to experience nature	Support welcomed	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
We support this policy. Suggest reference to ancient or veteran trees in criterion iii.	We propose to update this criterion to refer to ancient and veteran trees	Change proposed
Welcome and strongly support Policy NE1	Support welcomed	No change proposed
We support the Council's commitment to protect the openness and character of Metropolitan Open Land and other designated open spaces	Support welcomed	No change proposed
A proposal for a Camden Nature Corridor was submitted, which links Hampstead Heath with Kentish Town. This is intended to contribute to the development of the Borough's nature recovery network and increase biodiversity	We propose to refer to the Camden Nature Corridor as a key strategic green link in the Borough It will also be mentioned as a key infrastructure project in the Local Plan policies for the Central and North sub areas.	Change proposed
Suggest cross-reference to policy CC12 in biodiversity policy NE2. Promote and support Urban Greening Factors	We propose to insert a cross-reference to Policy CC11 Sustainable Drainage into the introduction to this policy. Urban Greening Factor is referenced in the supporting text to policy NE2	Change proposed No change proposed
Welcome policy NE1 and supporting text	Support welcomed	No change proposed
Suggest the Regent's Canal Conservation Area Appraisal and Management Strategy be updated.	Noted.	No change proposed
Strong protection to maintaining the openness and character of Metropolitan Open Land (MOL)" is very vague	The Plan's approach to MOL is not considered to be vague. As set out in paragraph 11.5 we will protect the openness and character of these spaces in accordance with London Plan policy and	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	national policy on green belts.	
All biodiversity corridors should be regarded as equally crucial to maintaining and reinforcing biodiversity between designated sites.	Policy NE2 states that the Council will safeguard features of biodiversity value such as wildlife corridors and stepping stones. Paragraph 11.16 states that the Council will also look to secure contributions, through Section 106, to enhance links between open spaces and create corridors which allow species to move between habitats. A minor change is proposed to clarify when we might seek contributions for green links ('corridors') or for buffers around designated sites, namely schemes proposing additional housing and all major developments.	Change proposed
Camden should consider withdrawing PD rights for gardens adjacent to designated open spaces, or within existing or potential green corridors.	Article 4 Directions are not introduced through the Local Plan, but through a separate process. The Council is planning to introduce an Article 4 direction for development in front gardens, however there are no plans for back gardens or wildlife corridors at the current time.	No change proposed
Include a policy specifically encouraging owners to manage their gardens to promote biodiversity and commit to work with residents with in the identification,	It is not the role of the Local Plan policies to encourage particular actions by individuals or commit to particular activities.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
enlargement and protection of green corridors.		
The Waterlow Park Trust Advisory Group requests a more detailed description in the section 'Key open spaces in Camden' acknowledging the unique attributes and benefits of Waterlow Park	Waterlow Park is one of a number of large strategic open spaces which are designated as 'Metropolitan Open Land' (MOL) which is treated similar in planning policy terms to green belt. We do not consider it is necessary to include detailed references to the function and character of the open space as the matters referred to are addressed through adopted conservation area supplementary planning guidance for Highgate Village. Further, Waterlow Park is a designated Site of Importance for Nature Conservation (SINCs), all SINCs in Camden have recently been reviewed by London Wildlife Trust as part of the Local Plan's evidence base. This review contains a detailed description of Waterlow Park's biodiversity value.	No change proposed

Policy NE2 – Biodiversity

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Queries about biodiversity including whether the Council employs an ecologist to input on building projects.	The Council employs a nature conservation officer who can input on development schemes where necessary.	No change proposed
Set a BNG target greater than 10% as some sites will have an extremely low	We have identified key opportunities for creating/expanding	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
level of biodiversity and 10% will not deliver meaningful enhancements on sites with low levels of biodiversity. Where achievable, 20%+ onsite gain should be encouraged	strategic wildlife corridors, e.g. major schemes/allocations at Kentish Town and Gospel Oak. Many sites in Camden have low/no biodiversity on site, therefore setting BNG at 20% instead of 10% would not have an appreciable impact. It would also not be reasonable to expect individual owners/applications to address Borough wide shortfalls in net gains	
Include a suitable number of swift bricks per home, including extensions	We propose to update the policy to make it clear that we expect suitable developments to integrate measures to support wildlife including swift bricks.	Change proposed.
Add protection of nest sites for building-dependent species to policy	This goes beyond planning, however we will highlight the plight of these bird species in Camden and propose to explain how swifts and house martins can be supported	Change proposed
Please add to the policy: Swift bricks to be installed in new developments including extensions in accordance with best-practice guidance such as BS 42021. Artificial nest cups for house martins may be proposed instead of swift bricks where specifically recommended by an ecologist	We propose to update the policy to make it clear that we expect suitable developments to integrate measures to support wildlife including swift bricks. We also refer to BS42021 and artificial nest cups.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Make swift bricks mandatory for all new builds	We propose to update the policy to make it clear that we expect suitable developments to integrate measures to support wildlife including swift bricks.	Change proposed
Welcome and strongly support Policy NE2	Support welcomed	No change proposed
Swift bricks to be installed in new developments	We propose to update the policy to make it clear that we expect suitable developments to integrate measures to support wildlife including swift bricks.	Change proposed
Swift bricks to be installed in new developments, including extensions	We propose to update the policy to make it clear that we expect suitable developments to integrate measures to support wildlife including swift bricks.	Change proposed
Swift bricks to be installed in new developments, including extensions	We propose to update the policy to make it clear that we expect suitable developments to integrate measures to support wildlife including swift bricks.	Change proposed
Please could swift bricks be installed in all new developments and extensions.	We propose to update the policy to make it clear that we expect suitable developments to integrate measures to support wildlife including swift bricks.	Change proposed
Welcome wording on green roofs and other biodiversity features	Support welcome.	No change proposed
Refer to grass and planting in criterion viii	We propose to add reference in the criterion	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	to the value provided by soft landscaping	
Loss of front garden space for parking affects the appearance of streets	The Council is planning to introduce an Article 4 direction for development in front gardens which would review existing permitted development rights	No change proposed
Very heartened to see Camden's increasingly strong focus on climate change and sustainability.	Support welcomed.	No change proposed
Should be more attention paid to below ground ecological networks/ soil connectivity as this is important for invertebrates and fungi	We propose to add reference to the importance of retaining topsoil in gardens	Change proposed
Support various aspects of NE2 and supporting text	Support welcomed	No change proposed
The Plan covers areas relevant to the proposed Nature Corridor. Propose this as one of Camden's future Nature Recovery Networks Highlight benefits of linking up and extending corridors in the Dartmouth Park area delivering benefits for wildlife and residents	Noted. We propose to highlight the opportunities for strengthening nature corridors in the Local Plan, such as the Camden Green Corridor	Change proposed
Remove reference to BNG as it is enshrined in law and is not planning policy	Whilst we agree that BNG is a mandatory requirement rather than a planning policy matter, the requirement is triggered by a planning application. We therefore consider it is appropriate to include a brief reference to make clear that the biodiversity policy will operate	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	alongside/in addition to BNG	
Should highlight the requirement for habitat management and monitoring alongside BNG submissions	We do not consider it is necessary to provide full detail of how BNG is intended to work as part of the Local Plan as this information is provided for applicants elsewhere	No change proposed
Designation of roof spaces on the King's Cross Estate as a SINC is not acceptable if the proposal would compromise the functioning of the building or fetter the ability of the landowner to undertake operational works. The mitigation hierarchy should be referenced in Policy NE2	We are not proposing to take forward the proposals to designate roofs as a SINC. The mitigation hierarchy is covered by Policy NE2 iii	No change proposed
Promote use of native planting as ornamental and non-native species can be problematic for biodiversity	The plant species used in gardens is outside of the control of the local plan / planning system.	No change proposed
Please clarify that the Council will apply the exemptions for BNG set out in the Environment Act 2021	BNG requirements are set out in the national scheme, including exemptions. It is not considered necessary to repeat these as part of the Local Plan (particularly as they could change over time)	No change proposed
Welcome Camden's commitment to resisting development that occupies an excessive part of the garden, and the loss of garden space which contributes to the character of the townscape.	Support welcome. We will pass on the comment about tree planting onto the relevant service in the Council.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The borough's tree planting target should be more ambitious and expressed as net additional.		
Support draft policy NE2. Would be open to a portfolio/estate-wide approach to BNG on their estate	Support welcome. We note the comments about implementation of BNG - we will pass onto the relevant Officers in the Council. We don't consider that this matter needs to be addressed further as part of the Local Plan	No change proposed
Refer to the importance of gardens both as wildlife corridors and in maintaining green corridors in the policy	We propose to acknowledge the importance of gardens as wildlife / green corridors in the policy text	Change proposed
Take into account cumulative impact on green corridors.	Noted. We propose to highlight the importance of sustaining the function of existing/emerging corridors.	Change proposed
Bring forward Article 4s in back gardens within green corridors or adjacent to designated ecological sites.	The Council is planning to introduce an Article 4 direction for development in front gardens, however there are no plans for back gardens or wildlife corridors at the current time.	No change proposed
Green corridors must form an integral element of biodiversity protection to prevent the isolation and progressive weakening of biodiversity in priority habitats	We propose to add text to refer to the role of corridors in reducing the risk of the Borough's designated wildlife sites becoming isolated and deteriorating over time.	Change proposed
Consider appropriate article 4 Directions to tackle the multiplicity of smaller developments eroding garden space	The Council is planning to introduce an Article 4 direction for development in front gardens, however there are no plans for back gardens or wildlife	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	corridors at the current time.	

Policy NE3 - Tree Protection and Planting

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Mention of the use of rainwater harvesting, greywater storage or water from storm attenuation would be useful	Noted. Detail on the source of water for tree maintenance is considered to be more suitable for supplementary guidance than the Local Plan.	No change proposed.
Support the whole of this policy.	Support welcomed.	No change proposed.
Add a requirement for tree surveys into the policy text. Suggest specific additional wording on protecting individual ancient and veteran trees, the Tree Planting Strategy, ratio of replacement trees and use of native species/ trees resilient to pests.	We propose to add reference to requiring tree surveys on all development sites and that applicants should have regard to Natural England and Forestry Commission's standing advice on Ancient woodland, ancient trees and veteran trees. We will propose tree replacement ratios of at least 2:1 for all but the smallest trees and up to 8:1 for the largest We propose to add reference in the policy to the importance of tree planting in areas with low tree cover We also propose adding reference to planting of native species and pest resilience	Change proposed
Supports the Council's tree planting strategy as	Support welcome	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
set out in policy NE3 in all aspects		
Some street trees are too big for their location and will need to be replaced with smaller trees.	Noted. Street trees are not a matter that is controlled through local plan policy.	No change proposed
Welcome this policy	Support welcomed	No change proposed
The Council must seek replacements where trees provided in developments die	We propose additional text to identify what needs to happen if trees planted as part of a development die prematurely.	Change proposed
The Local Plan should incorporate the policy on trees in the adopted Fortune Green West Hampstead Neighbourhood Plan	We consider that these matters are already addressed in the draft Local Plan. We have, however, included additional text about what is expected in terms of replacement planting, i.e.. numbers of trees to be planted	Change proposed

Policy NE4 - Water Quality

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The draft policies are considered to be strong. Suggestion to add reference to: • NPPF paras 180 – 189 on groundwater and land quality. • Water Framework Directive - Camden Council has a legal responsibility to have regard for the Thames River Basin Management Plan – as per London Plan Policy SI 5 D1 • Developers should follow risk management framework (Land	Support welcomed. The draft policy is considered to be consistent with the NPPF. It is not considered necessary to add a reference to specific NPPF paragraphs. The draft policy seeks to ensure development does not negatively affect water bodies, in line with the Water Framework Directive. We propose that the supporting text refers to the Water Framework Directive and Thames River Basin Management Plan.	No change proposed Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Contamination: Risk Management) when dealing with groundwater and land quality issues. • Environment Agency approach to groundwater protection to be considered for proposals that include sub-water table storage of hazardous substances)	With regards to Land Contamination: Risk Management, this is covered under Policy A1 Protecting Amenity, so no change to wording is considered necessary. We propose to update the supporting text to make reference to - The Environment Agency's Approach to Groundwater Protection should be consulted for development constraints at sites above Secondary A aquifers.	No change proposed Change proposed

Chapter 12 - Design and Heritage

In total **281** representations were made on the Design and Heritage Chapter. Of these, **43** representations were received via commonplace and **238** representations were received via email.

Representations were received from the following consultees:

- Argent
- Airspace Group
- Association of Specialist Underpinning Contractors (ASUC)
- Basement Design Studio
- Basement Force Ltd
- Bedford Estates
- Belsize Parkhill and Elsworthy Conservation Area Advisory Committee
- Birkbeck (University of London)
- British Land
- British Museum
- Bloomsbury Conservation Area Advisory Committee
- Camden Railway Heritage Trust
- Covent Garden Community Association
- Dartmouth Park Neighbourhood Forum
- Environment Agency
- Eton Conservation Area Advisory Committee
- Folgate Estates
- Greater London Authority
- Great Portland Estates

- Highgate Conservation Area Advisory Committee
- Highgate Society
- Historic England
- Hogarth Properties S.A.R.I.
- Holborn Links Estate
- London Borough Islington
- Kentish Town Neighbourhood Forum (KTNF)
- Lazari Investments
- Lendlease & Euston landowners
- London Property Alliance
- LS Finchley Road Ltd
- National Grid
- Network Rail
- NHS Healthy Urban Development Unit
- One Housing and Countryside Partnership
- Primrose Hill Conservation Area Advisory Committee
- Regal London
- Royal London Assets Management
- Royal Mail Group (RMG)
- Somerstown Neighbourhood Forum
- Sport England
- St George West London Ltd
- Thames Water
- The Heath and Hampstead Society
- Unite Group PLC
- University College London (UCL)
- University of London
- YC CFQ Ltd

General Comments

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
New buildings should respect the existing architectural and environmental context especially in close proximity to listed buildings and heritage assets should be cherished.	The approach set out in policies D1 Achieving Design Excellence and D5 Heritage seek to achieve this.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Building heights should be restricted to the height of surrounding buildings.	The Council's approach to tall buildings is set out in new draft plan policy D2 Tall Buildings. The Plan also identifies where tall buildings may be an appropriate form of development in Camden. It won't always be appropriate to restrict building heights to the height of existing buildings.	No change proposed.
Green spaces should be meaningful in scale (large enough for playing games). Pocket parks are not supported.	New draft plan policy SC3 Open Space, sets out the Councils approach to protecting existing and providing new open spaces. Pocket parks and smaller green spaces are provided to compliment larger spaces not in place of them. The provision of new large open spaces in Camden is challenging however given the limited availability of land.	No change proposed
There are concerns that there is little consideration for the effects of new (tall) buildings on the local soundscape, and the difficulties that people with hearing aids have due to sound bouncing off tall buildings. Acoustic screening should be employed to minimise the issue.	Comments noted. As part of the consultation process the Council have engaged directly with members of the local deaf and disabled community, in addition to the wider public consultation. Draft policy A4 seeks to ensure that Noise and Vibration avoids adverse impacts on health and quality of life for all. Clause ii) of the policy outlines that the Council will "ensure that where noise mitigation is required, this is incorporated into the proposed development at the design stage of the planning process",	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	furthermore iv) states we will resist development likely to generate unacceptable noise and vibration impacts. Acoustic screening may form part of an acceptable proposal in order to achieve the aims of the policy and wider plan.	

Policy D1 - Achieving Design Excellence

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support for policy D1, in particular B.xv and C.xi	Support welcomed.	No change proposed
Suggestion for the inclusion of 'Swift bricks' for small bird species to nest within all new non-residential developments.	We propose to update policy NE2 (Biodiversity) to seek the provision of swift bricks.	No change proposed
Concern that demands on developers add costs to housing units.	The Council have undertaken a viability study to support the Local Plan. This looks at the cumulative impact of the policies in the plan on the viability of development. The viability study is available to view on the council website: Evidence - Camden Council	No change proposed
Suggest the local plan mentions public design competitions.	The local plan promotes high quality design but cannot require the use of design competitions.	No change proposed
Recommendation to include reference to Design Codes.	We propose to update the supporting text to policy DS1 delivering healthy and sustainable development to refer to design codes.	Change proposed.
Suggested additional wording to policy D1:	No additional wording is considered necessary. Policy D1 states that	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
"taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."	development will be expected to respond positively and sensitively to local context and character through layout, orientation, scale, height, bulk massing, proportion, appearance and the use of high quality, durable and sustainable materials. This would take into account existing constraints.	
Conservation Areas Appraisals need updating.	Comment noted. This is not a matter for the local plan.	No change proposed
Query regarding para 12.8 What does "architect retention clauses in legal agreements" mean?	The practice of using architect retention clauses in legal agreements is established in the existing Camden design CPG. This is not a new expectation on developers. Its purpose it to require the developer to retain the architect for the duration of the project and thus ensure the design is carried out as intended and in accordance with the approved drawings.	No change proposed
Para 12.8 Add "applying rigorous enforcement of planning consents, especially in conservation areas."	Comments noted. Enforcement is not a matter for the Local Plan.	No change proposed.
Para 12.10 Add "at a level appropriate to the scale of the proposals".	We propose to update the Plan to take on board this comment.	Change proposed
Paras 12.14- 2.15 Independent Design Review, add "Panel".	We propose to update the Plan to take on board this comment	Change proposed.
Suggested amended wording at pp.321-32 D1	We propose to update the policy wording to "respect	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
B iv. To replace 'responds' with 'respects'.	local views and preserve protected strategic views".	
Request for additional text to ensure that applicants understand why local views matter to communities and requiring that proposals protect their recognized significance.	We propose to update the policy wording to "respect local views and preserve protected strategic views".	Change proposed
Support for 12.6 p323 regarding the role of Conservation Area Appraisals in design guidance.	Support welcomed.	No change proposed.
Support for 12.9-12.11 pp 323-43 regarding Community engagement.	Support welcomed.	No change proposed
Strong support for the Council's aspirations for good design that support the unique character and identity of Camden.	Support welcomed.	No change proposed
Support for policy D1 Part A objective of achieving excellence in architecture, responding to climate change, improving health and well-being and celebrating diversity.	Support welcomed.	No change proposed.
Concern regarding policy requirement at Part C i) regarding need for 'co-design' of public spaces with local people.	We propose to update part C of policy D1 to replace the word 'require' with 'expect'.	Change proposed
Request for removal of reference to the use architect retention clauses in legal agreements.	Para 12.8 says the Council will consider using architect retention clauses where appropriate. This is not considered unreasonable and is consistent with the approach set out in current Camden Planning Guidance on Design.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Strong support for Council's aspirations for good design that supports Camden's unique character and identity.	Support welcomed.	No change proposed
Support for policy D1 Part A objective of achieving excellence in architecture, responding to climate change, improving health and well-being and celebrating diversity.	Support welcomed.	No change proposed
Concern regarding policy requirement at Part C i) regarding need for 'co-design' of public spaces with local people.	We propose to update part C of policy D1 to replace the word 'require' with 'expect' and build in greater flexibility.	Change proposed.
Request for removal of the use architect retention clauses in legal agreements.	Para 12.8 says the Council will consider using architect retention clauses where appropriate. This is not considered unreasonable and is consistent with the approach set out in current Camden Planning Guidance on Design.	No change proposed
Support for policy and identification of environmental design criteria.	Support welcomed.	No change proposed
It remains unclear what the requirement (D1 A.) for achieving 'excellence' in architecture and design means in practice, and whether there are benchmarks which the Council wishes to identify.	The policy sets out a number of criteria to guide development coming forward in Camden to help achieve design excellence. The policy is worded flexibly to support innovation and creativity. The addition of benchmarks are not considered appropriate.	No change proposed
Recommend referring to the London Review Panel, and to the Housing Design Standards London Plan Guidance.	Comments noted. The supporting text of D3 (Design of Housing) refers to the Housing Design Standards London Plan Guidance.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
A suggestion to strengthen the wording at D1 B iv, to replace 'responds' with a phrase demanding protection of significance of local view.	We propose to update the policy wording to "respect local views and preserve protected strategic views".	Change proposed
The encouragement of community engagement and more importantly the obligation to take account of that engagement should be strengthened in this section.	Para 12.9 expects, rather than encourages, engagement with local communities and expects developers to evidence their engagement and how it has been used to inform the design of their scheme. No change is considered necessary.	No change proposed
Consideration should be given to how development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities.	This matter is covered by policy DS1 (Delivering Healthy and Sustainable Communities). It is also addressed in new draft plan policy D1 Achieving Design Excellence, Part B xix) which requires development to encourage walking wheeling and cycling, and promote health and well-being.	No change proposed
Recommend that Sport England's Active Design guidance is included at para 12.6.	We have updated the supporting text to D1 to refer to Sport England's Active Design guidance.	Change proposed.
Strong support for planning policies that are brought forward in the draft Local Plan in relation to inclusive environments, and aspirations for improvements to accessibility for all.	Support welcomed.	No change proposed
More reference should be given to the requirement for an inclusive design statement as part of planning applications	We propose to update the supporting text to clarify that Design and Access Statements should show the developer has thought carefully about how	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
submitted as per the London Plan guidance.	everyone, in particular d/Deaf, disabled and neurodiverse people, older people, women and gender diverse people, and children, will be able to use the places created.	
Support for the objective of achieving excellence in architecture, responding to the climate change emergency, improving the health and wellbeing of Camden's communities and celebrating the diversity of Camden's people and places.	Support welcomed.	No change proposed
Suggestion for Para 12.8. Add to bullet point two, "requesting that detailed *drawings, plans,* design sections and supporting information is provided where appropriate, to illustrate a proposal;" *"This should be a requirement for development proposals in Conservation Areas and those affecting listed buildings and non-listed buildings."*	We propose to update bullet point 2 of para 12.8 to reflect the comment made.	Change proposed.
Suggested wording to ensure ongoing facility management: D1, C (iv). Please augment the text to say, "provide and manage free, publicly accessible toilets suitable for a range of users".	Toilets are covered under policy SC3 (Community Infrastructure). It promotes the provision of free, publicly accessible toilets, including Changing Places toilets where appropriate, baby change, Wi-Fi and drinking water facilities, where practical. The policy also expects it to be demonstrated that	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	funding arrangements are secured for the future maintenance and management of community facilities.	
Support for expectation that community engagement is evidenced.	Support welcomed.	No change proposed.
Support for policy.	Support welcomed.	No change proposed
Suggested additional point D1 Part B should add a further point, 'seeks to optimise the site to contribute to Council's wider targets'.	This is covered by policy DS1 (Delivering Healthy and Sustainable Communities).	No change proposed
Suggested additional wording D1 Part C v, 'provide opportunities for formal and informal play where appropriate'.	We proposed to update the policy to add the suggested wording.	Change proposed.
Support for expectation that applicants will engage with local communities on design of scheme, but concern that this is not adhered to.	Support welcomed. Comments noted.	No change proposed
Recommendation to reference NPPF para137.	We propose to update the supporting text of policy D1 to refer to para 137 of the NPPF.	Change proposed
Request for clarification regarding 'design review'/ Camden Design Review Panel?	We propose to update the supporting text to reflect this comment.	Change proposed

Policy D2 - Tall Buildings

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
D2 Map 13 indicates a cluster of tall buildings which is completely inappropriate and should be reconsidered.	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the London Plan. London Plan policy D9 Tall Buildings requires boroughs to identify locations where tall buildings may be an	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	appropriate form of development, based on an exercise assessing potential impacts. The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	
Objection to tall buildings in the Murphy Area or Regis Road Area please	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the London Plan. London Plan policy D9 Tall Buildings requires boroughs to identify locations where tall buildings may be an appropriate form of development, based on an exercise assessing potential impacts. The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed
Why are tall buildings shown on Map 13 by Kentish Town?	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	London Plan. London Plan policy D9 Tall Buildings requires boroughs to identify locations where tall buildings may be an appropriate form of development, based on an exercise assessing potential impacts. The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	
Tall buildings developments should include specific requirements to address impacts on biodiversity (wind channelling, bird collisions, lighting conditions, migrations routes).	We propose to update the policy to refer to the need to consider the impact on biodiversity.	Change proposed
Please note that the GOSH Phase 4 development is over 40 metres high, and presumably sets a precedent for more of similar height in the area.	Comment noted. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed
The policy is too restrictive. If tall buildings facilitate housing construction, they should be allowed more widely.	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the London Plan. All applications for tall buildings will be assessed on their merits against the criteria in	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	
This policy seems to prioritize aesthetics over housing affordability in the borough.	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the London Plan. Criterion A. iv. of Policy D2 states that, when assessing proposals for tall building we will give particular attention to whether the proposal maximises the supply of affordable housing and delivers 50% affordable homes in accordance with the target set out in Policy H4 Affordable Housing.	No change proposed
We should aspire to beautiful spaces, but that isn't as important as making sure everyone can afford a home.	Comment noted	No change proposed
Tall buildings have a detrimental impact on neighbourhoods and historic character.	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the London Plan. All applications for tall buildings will be assessed on their merits against policy D2, which includes criteria to ensure the impact of development pays attention to the historic context of the buildings surroundings, policy D1 on Design, and Policy D5 on Heritage, which seeks to protect heritage assets within the borough.	No change proposed
Tall buildings should not be clustered as proposed	The approach to tall buildings in the Local Plan reflects the need to ensure	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
in Gospel Oak and Kentish Town.	general conformity with the London Plan. London Plan policy D9 Tall Buildings requires boroughs to identify locations where tall buildings may be an appropriate form of development, based on an exercise assessing potential impacts. The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. All applications for tall buildings will be assessed against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	
The (tall) buildings on the Morrison site are atrocious, intrusive, out of character and an eyesore.	Comment noted.	No change proposed
Consideration should be given to the impact on existing or potential installations of renewable energy on neighbouring properties.	We propose to update Policy D1 Achieving Design Excellence to say that development should avoid having a detrimental impact on existing solar photovoltaic panels e.g. through overshadowing	Change proposed.
Embodied energy relating to demolition of existing buildings on site and the embodied energy in the proposed building.	Chapter 8 of the draft plan - Responding to Climate Change - specifically sets out the Council's strategy for addressing climate change and would apply to all tall building proposals. Policy D2 makes specific reference to CC3, CC4, CC5 and CC6 in the Climate	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	Change Chapter. Policy CC2 seeks to ensure that demolition is a last resort after repurposing, refurbishment and re-use. CC3 requires minimisation of waste during construction and throughout use and operations. CC4 seeks to minimise carbon emissions. CC5 deals with energy reduction in existing buildings, whilst CC6 deals with new builds which should be built to net zero standards.	
The effect of down draughts may not be limited to the upper storeys mentioned; and in any case storey heights vary.	We propose to update the supporting text to read "care should be taken to ensure that the design of tall buildings should minimise any impacts on local Microclimates".	Change proposed
Sites in Maitland Park could be visible from Hampstead Heath.	Comments noted. Draft policy D2 clause vii) and viii) outline that the Council will pay particular attention to historic context and the relationship between local views and protected views when assessing any proposals for tall buildings.	No change proposed.
The tall buildings map is too general and does not reflect the grain of our borough. Giving just three proposed building heights will encourage developers to aim for the maximum in any area without consideration for local context.	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the London Plan. London Plan policy D9 Tall Buildings states boroughs should define what is a 'tall building' for specific localities. This is intended to be a broad	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	definition of what is considered to be a tall building and consequently subject to the tall buildings policy. The London Plan notes that this does not mean that all buildings up to the threshold height are automatically acceptable. The map reflects the findings of the Camden Building Height study, which also included a finer grained assessment at the site level. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	
Tall buildings on St Pancras Hospital site and Parcelforce and ATS Tyre site would have negative impacts on light levels to local housing and place huge burdens on traffic infrastructure.	All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies. Draft Local Plan Policy A1 – Protecting Amenity resists development that fails to adequately address transport impacts affecting communities, occupiers, neighbours and the existing transport network, and also ensures consideration of sunlight, daylight and overshadowing.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There is no key on Map 13 to enable identification of specific sites.	Appendix 2 contains a schedule of the sites identified on Map 13. For clarity, we propose to move the schedule, so it is located next to the map.	Change proposed
D2 Map 13, Sites g, f, k, l and n would appear to be highly visible from the Conservation Area, building heights should reflect this.	All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies. Draft policy D2 Part C clauses vii) and viii) state that the Council will pay particular attention to historic context and ensure that proposals consider local views and preserves protected views.	No change proposed.
Reference to health and well-being is the supporting text is welcomed, in particular potential suicide risks. However, this should form part of the policy text to strengthen it or clear reference to policy A2 should be made which makes reference to potential suicide risks.	This matter is covered in Policy A2 Safety and Security, which will apply to all tall building applications. No change to the wording is considered necessary.	No change proposed.
We argue that 'responds' is too weak and strongly urge that the text is revised to replace 'responds to' with 'respects', at D2 part C clause viii).	We propose to update the policy to read "the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views".	Change proposed
The Council should require evidence that a tall building is the only way to achieve the	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
building requirement – for example, medium-rise high-density developments have long been recognized as preferable for housing.	with the London Plan. Any application for proposed development would need to explain and justify the design approach in accordance with Policy D1 Achieving Design Excellence, as well as meet the policy requirements in policy D2, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	
We welcome this policy statement: how can it be made effective?	Support welcomed. All applications for tall buildings will be assessed against the criteria in policy D2, policy D1 on Design, policy D5 on Heritage, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed.
We welcome this policy statement: how can it be made effective?	Support welcomed. All applications for tall buildings will be assessed against policy D5 on Heritage, as well as policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed.
Support for policy, supporting text and diagrams. Reference to 50% affordable housing should be removed and emphasis should be placed on maximising affordable housing. The provision of affordable housing may also be part of wider public benefits which should be given consideration during	Support welcomed. We propose to amend the policy wording to clarify that affordable housing provision should be made in accordance with Policy H4 Affordable Housing Delivery.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
assessment of tall building schemes.		
We strongly object to high buildings being allowed which are close to and can be clearly seen from the Heath - thus compromising its openness and character.	The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. The acceptability of a particular application for a tall building will be assessed taking into account the criteria in policy D2, which includes consideration of historic context, policy D2 on Heritage, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed.
Query findings of the Camden Building Heights Study, justifying tall buildings so close to the Heath.	Comments noted. The Camden Building Heights Study was carried out in accordance with London Plan policy and guidance. The Local Plan must be in general conformity with the London Plan.	No change proposed.
It seems reasonable for the 40 metre height threshold to be defined by the South Camden boundary rather than the Central Activities Zone boundary. Given the Borough's central London location, we consider that there should be more reference to, and support for, high density development across the whole of the Borough.	The approach in the draft Local Plan reflects the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. Policy DS1 states that development should use land efficiently and that development should make the best use of a site. It states that the Council will resist development that makes inefficient use of Camden's limited land. No change to policy D2 is considered necessary.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There should be more reference to and support for high density development across the whole borough.	Draft Local Plan Policy DS1 states that development should use land efficiently and that development should make the best use of a site. It states that the Council will resist development that makes inefficient use of Camden's limited land. No change to policy D2 is considered necessary.	No change proposed.
Support for policy D2 Map 13 site identification.	Support welcomed.	No change proposed.
The whole borough should be considered capable of delivering new development and densification, subject to meeting the necessary policy requirements of this Local Plan.	Comment noted.	No change proposed.
There is concern for the inclusion of the Murphy Site in Map 13 as this falls within a protected view in the Kentish Town Neighbourhood Plan and Historic England and others had objected to a previously withdrawn application.	The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. The acceptability of a particular application for a tall building will be assessed taking into account the criteria in policy D2, which includes consideration of historic context, policy D2 on Heritage, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies. The need for any development of the Murphy site to consider the protected	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	view in the Kentish Town and Dartmouth Park Neighbourhood Plans is set out in site allocation C3.	
Support for the principle of policy D2.	Support welcomed.	No change proposed.
There should be more reference to and support for high density development across the whole borough.	Draft Local Plan Policy DS1 states that development should use land efficiently and that development should make the best use of a site. It states that the Council will resist development that makes inefficient use of Camden's limited land. No change to policy D2 is considered necessary.	No change proposed.
Policy D2 says that tall buildings are those over 40 metres in height in the CAZ and over 30 metres elsewhere in the borough .Any stated parameters for the heights of tall buildings within Policy D2 should be indicative. It should be recognised that ultimate proposed heights will be arrived at through in-depth analysis and consideration of public benefits. This best occurs at the planning application stage and policy should be sufficiently flexible to reflect this.	The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the London Plan. In accordance with the London Plan, Policy D2 defines a 'tall building' is for specific localities and identifies locations where tall buildings may be an appropriate form of development in Camden, subject to meeting the other requirements of the Plan. It also sets out criteria to guide the determination of applications for tall buildings in the borough. The site allocation policies then set out potentially appropriate height ranges for tall buildings on specific sites. The acceptability of a particular planning application for a tall	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	building will be assessed taking into account of policy D2, and all other relevant policies. The approach set out in the Local Plan is considered to be consistent with the London Plan and offer sufficient flexibility to developers.	
The policy should acknowledge the presence of other tall buildings in the local context. It is suggested that there may be a London Plan LVMF review coming forwards.	The identification of sites where tall buildings may be an appropriate form of development has taken into account local context, including existing tall buildings in the area. The acceptability of particular tall building proposals would be assessed taking into account local context and other tall buildings in accordance with Local Plan and London Plan policies. No change is therefore considered necessary. It is not appropriate for the plan to anticipate the outcome of the review of the LVMF.	No change proposed
Recognise that the Euston Area Plan update sets out the policy approach to tall buildings within the designated area so will provide further comments on the EAP update.	Comment noted.	No change proposed.
The whole borough should be capable of delivering new development and densification.	Comment noted.	No change proposed.
Building heights of 30m outside of the CAZ should be used as a general	The 30m figure is broad definition of that is considered to be a tall	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
guide as opposed to a maximum.	building in that part of the borough and therefore subject to the tall buildings policy, and is in accordance with the approach set out in the London Plan. It is not a maximum height. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	
There are potential detrimental effects on the community due to separation of residential uses from the streetscape (if the tall buildings turn into predominantly residential spaces). Mid-height buildings that create a layered street scape with private and public green spaces which might provide more variation and visual interest.	Draft policy D2 part C outlines the criteria to which the Council will give particular attention when assessing tall buildings applications. Any proposed development would be assessed against all material considerations. D2 part C criteria include; the relationship of new buildings to their surroundings, the streetscape, public realm, historic context, local and protected views and open space. It is acknowledged that a range of building heights may be appropriate in different locations.	No change proposed.
There is concern regarding the materials used in construction of tall buildings, particularly steel and concrete due to their proven contribution to greenhouse gases.	Comments noted. No change to wording is considered necessary. The policy states that we will give particular attention to whether the development delivers the highest standards of sustainable design and construction in line with	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	Policy D1 Achieving Design Excellence.	
Support for policy D2 which is consistent with policy D9 of the London Plan 2021. Map 13 is in line with policy D9 of the London Plan 2021. The policy does not identify the appropriate suitable height in each of the different locations but has this information in specific site allocations. Consider whether it would be more appropriate to identify areas rather than sites as these may be subject to changing boundaries. This is particularly relevant for adjoining sites as shown on Map 13. It is suggested that any harm arising from tall buildings outside of identified areas should be clarified and those areas should not be excluded where there is no harm. This documentation will be critical for considering any planning applications for tall buildings that come forward outside identified areas in future. Sites surrounding identified areas should be assessed for suitability, especially where they share similar townscapes.	Support welcomed. The approach is consistent with the findings of the building heights study and any applications for tall buildings outside of the identified locations will be assessed against D2, London Plan policy D9 and other relevant policies.	No change proposed.
It would make the policy much clearer if the	We propose to move the schedule of sites	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
information on suitable heights in the identified areas was contained within the policy text itself rather than in the site allocations and appendix to the draft Plan.	identified as being potentially suitable locations for tall buildings from the Appendix into the supporting text for policy D2.	
There is no place for any new tall buildings, or upward extension of existing tall buildings, within any of the Camden Conservation Areas or in any location that affects the setting of same. Tall buildings are antisocial (they create excess wind and shade for those not privileged to live or work in them), they are intrinsically unsafe and intrinsically irresponsible with regard to achieving net zero carbon.	Comments noted. The approach to tall buildings in the Local Plan reflects the need to ensure general conformity with the London Plan which requires boroughs to identify locations where tall buildings may be an appropriate form of development, based on an exercise assessing potential impacts. All applications for tall buildings will be assessed against the criteria in policy D2, which includes consideration of historic context, amenity, safety and sustainability, policy D1 on Design, policy D5 on Heritage, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed.
The council should take account of potential harm to the CA or it's setting rather than simply 'give particular attention to'. It is suggested that applicants should be obliged to provide evidence that a tall building is the only way to achieve the building requirement rather than, for example, medium-rise high density development.	Comments noted. Any application for proposed development would need to explain and justify the design approach, this would include the case for a tall building on a given site. All other relevant policies would apply including draft policy D5 – Heritage, which aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
General support for tall buildings policy. Vertical developments optimise land use and thus optimizing land use which is essential for the growing student population across London. Well-designed student accommodation buildings can contribute to the aesthetic appeal of the cityscape, creating a distinctive skyline.	Support welcomed. Comments noted.	No change proposed.
It is recommended that a number of the locations where tall buildings may be an appropriate form of development (highlighted green on Map 13) are expanded to encompass Unite's existing student accommodation sites. The Unite sites located immediately outside the boundaries of these areas are as follows: - Beaumont Court, College Grove NW, London NW1 0RW (located adjacent to Map area C) - St Pancras Way, 11 St Pancras Way, London NW1 0PT (located adjacent to Map area D) - Mary Brancker House, 54-74 Holmes Rd, London NW5 3AQ (located adjacent to Map area F) It is recommended that the boundaries of map	The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. Application for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
references C, D and F are expanded to encompass Beaumont Court, St Pancras Way and Mary Brancker House respectively.		
Policy D2 is inconsistent with policy H4 (affordable housing). It does not need to reference affordable housing, which will apply in any event. The London Plan does not have an equivalent provision or reference.	We propose to amend the policy wording to clarify that affordable housing provision should be made in accordance with Policy H4 Affordable Housing Delivery.	Change proposed
The draft plan is in line with the London Plan with regards to the defining tall buildings and indicating where they are appropriate.	Comments noted.	No change proposed.
Euston falls within the designated 40m threshold area. MDP/LREP reps should consider how this relates to existing ASD/OSD development proposals (Noting section 12.19 does go on to state that proposals at Euston should have regard to EAP in designing tall buildings).	Comments noted.	No change proposed.
The introduction of a new 'South Camden' area effectively seeks to extend the CAZ and the policies applicable to developments in the CAZ further north. It therefore seems reasonable for the 40-metre height threshold to be defined by the South Camden boundary rather than the CAZ boundary.	The 40m height threshold reflects the findings of the Camden Building Heights Study carried out in accordance with London Plan policy and guidance, and reflects the underlying character and height scape in the borough.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
It is considered that there should be more reference to, and support for, high density development across the whole of the borough, particular near transport nodes.	Policy DS1 states that development should use land efficiently and that development should make the best use of a site. It states that the Council will resist development that makes inefficient use of Camden's limited land. No change to policy D2 is considered necessary.	No change proposed.
The relevant sensitivities (historic context, significance and setting) of each area are not assessed in detail in the evidence base. To prescribe an appropriate height without such analysis is contrary to the policy guidance; establishing appropriate heights should be as a result of detailed site-specific testing.	The Camden Building Heights Study was carried out in accordance with London Plan policy and guidance. Applications for tall buildings will be assessed against the criteria in policy D2, which includes consideration of historic context, policy D1 on Design, policy D5 on Heritage, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed.
Policy D2 is inconsistent with policy H4 (affordable housing). It does not need to reference affordable housing, which will apply in any event. The London Plan does not have an equivalent provision or reference.	We propose to amend the policy wording to clarify that affordable housing provision should be made in accordance with Policy H4 Affordable Housing Delivery.	Change proposed
The skyline to the South and South East of the Heath, and famous views of London, including from Parliament Hill, must be preserved. Southern sections of the Heath are open grassed areas which allow tall buildings to the South & South East to be clearly	Comments noted. All applications for tall buildings will be assessed against the criteria in policy D2, which includes consideration of historic context and the relationship between the building and hills and views, policy NE1 - Nature Environment,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
seen. There is concern for the prospect of a high rise horizon. Existing tall buildings (Royal Free Hospital and Bacton Tower) provide evidence of potential effects of tall buildings close to the Heath. There is concern for the potential of tall buildings to be clearly visible from the Heath and cause harmful impacts on views. Suggested a more bespoke approach is employed in the identified zones impacting the Heath. A new sub-zone is suggested which would restrict building heights to 8 storeys in small clusters) covering an area to the south-east of the Heath.	which states we will take into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath, Policy D1 on Design, policy D5 on Heritage, London Plan Policy D9 on Tall Buildings, which states that the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals, and all other relevant policies. The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study, which was carried out in accordance with London Plan policy and guidance. A further sub-zone is not considered necessary.	
The recent Vicars Road 6&8 storey development is a good example of low-rise solutions with good design.	Comment noted.	No change proposed.
Islington support high density development where the quality of development is not compromised.	Support welcomed.	No change proposed.
Islington require all forms of development to be high quality, and set out the locations where tall buildings (over 30 metres) may be suitable.	Comment noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Islington agree that consideration of tall buildings needs to fully consider the various criteria set out in Part C of draft Policy D2.	Support welcomed.	No change proposed.
Islington note that the Kings Cross North site is located in close proximity to the Islington/ Camden boundary.	Comment noted.	No change proposed.
On the Islington side of the boundary, the King's Cross Triangle site (KC1) has already been allocated for a tall building. This site was not identified within Camden's Building Heights Study (2024).	Comment noted.	No change proposed
Islington would like to see some additional consideration regarding how buildings proposed on or near the borough boundary should consider their relationship with neighbouring boroughs, for example regarding heritage matters. We consider this, particularly relevant for those buildings up to 40m which would be considered a tall building in Islington and we would welcome further discussion on this issue.	We propose to update Policy D2 to also include reference to the fact that we will consider the relationship between the building and neighbouring boroughs, where tall buildings are proposed close to the borough boundary.	Change proposed
General support for policy D2.	Support welcomed.	No change proposed.
Suggestion for inclusion of Hawkridge House into the allocated areas for tall buildings and to discuss this further with the Camden Planning Policy team.	We propose to include Hawkridge House as a site allocation in the Local Plan to help meet our identified student housing need.	Change proposed
Given the Central London location and requirement	The approach in the draft Local Plan and the sites	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
within the Borough to deliver economic development and new homes, we consider there should generally be more support to the principle of high density development being supported, particularly in the CAZ/South Camden area.	identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. Draft Local Plan Policy DS1 states that development should use land efficiently and that development should make the best use of a site. It states that the Council will resist development that makes inefficient use of Camden's limited land. No change to policy D2 is considered necessary.	
Welcome the definition of the Kentish Town Planning Framework area as an area suitable for tall buildings	Support welcomed.	No change proposed.
Agree with the conclusions re: the Regis Road sub area. There may be further opportunity for additional height on this site but this would be subject to assessment against Policy D2 on tall buildings and other relevant development plan policies. This is considered an appropriate policy approach.	Support welcomed	No change proposed.
This policy appears commendable, but experience shows little regard is given to historic context when it comes to tall buildings, e.g. the Roundhouse and Camden Goods Yard.	Comment noted. Applications for tall buildings will be assessed against all relevant polices including policy D2, policy D5 Heritage, which aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	London Plan Policy D9 on Tall Buildings, and all other relevant policies.	
Policy D2 should reflect the presumption in para 12.70… *The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.*	Applications for tall buildings will be assessed against all relevant Plan polices, including Policy D5 Heritage, to which paragraph 12.70 is part of the supporting text. It is therefore not necessary to duplicate this in Policy D2.	No change proposed.
Re: para 12.23, the harmful impact on microclimate at ground floor level should be included in Policy D2.	We propose to update the supporting text to read "particular care should be taken to ensure that the design of tall buildings should minimise any impacts on local microclimates".	No change proposed.
Request to delete Map reference i). The Juniper Crescent site is not considered appropriate for tall buildings due to impact on the setting of listed buildings and the Conservation Area.	The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. The Study identified this site as a location where tall buildings may be an appropriate form of development. As noted in the site allocation for Juniper Crescent, the acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 and other relevant policies. This would include draft policy D5 – Heritage, which aims to preserve and, where appropriate, enhance Camden's	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	heritage assets and their settings.	
Site (e) in Shaftesbury Avenue; is considered unsuitable for a tall building. If you do not agree, it is very important that you contact us to discuss.	Comments noted. The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. The Study identified this site as a location where tall buildings may be an appropriate form of development. Subsequent to consultation on the Draft Local Plan, planning permission has been granted on this site for a development of up to 74m. It is therefore proposed to amend the site allocation for this site to reflect this. It is proposed that this recognises that the decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 and other relevant policies.	No change proposed.
Good design principles need to be considered the	Comments noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
highest priority when assessing tall buildings.		
Suggest part B is revised to include more flexibility to consider sites on a case by case basis, which in turn would then be required to have specific heritage and townscape testing.	Policy D2 is considered to be in accordance with London Plan policy and guidance, and it is considered that sufficient flexibility is provided. All applications for tall buildings will be assessed on their merits against the criteria in policy D2, policy D1 on Design, D5 on Heritage, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed.
It is suggested that the site allocation C9 (CGY4) – 100 Chalk Farm Road should be included in Appendix 2.	We propose to update the site allocation policy for this site to reflect that it now has planning permission. We do not consider it necessary to update Appendix 2 to include this site as it already has planning permission for a tall building.	No change proposed
It is suggested that the site allocation C18 (IDS20f) – Arlington Road former depot site should be included in Appendix 2.	The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. This site was not identified in the Study as being a site where tall buildings may be an appropriate form of development, based on an exercise assessing potential impacts, and it is therefore not considered appropriate to include it in Appendix 2. (We propose to move the schedule, so it is located next to the	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	map in the supporting text to policy D2.)	
We welcome the introduction of a specific tall buildings policy and support the differentiation in tall buildings definitions between the area of the borough within the Central Activities Zone and the area outside.	Support welcomed.	No change proposed.
Direct reference to considering and avoiding any adverse impacts on the historic environment should be included within the policy itself – this could be done at clause vii.	Policy D2 specifically refers to consideration of the building's historic context. However, we also propose to add a specific reference to policy D5 Heritage in the policy.	Change proposed.
The London Plan Guidance Characterisation and Growth Strategy contains helpful advice as to how to ensure tall building policies are robust enough to continue to protect the historic environment. Following screening, areas deemed suitable for tall buildings should undergo analysis of any harm to the local historic environment, as per 4.4.10 of the London Plan	The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. Applications for tall buildings will be assessed against all relevant polices including policy D2, policy D5 Heritage, which aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, London Plan Policy D9 on Tall Buildings, and all other relevant policies.	No change proposed
It is not clear how the analysis undertaken has informed the notional heights set out in a number of draft site allocations and what the effects on heritage significance and historic character might be. It	The approach in the draft Local Plan and the sites identified reflect the Camden Building Heights Study carried out in accordance with London Plan policy and guidance. Officers have met with Historic England	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
would be helpful to see the results of the building heights analysis to be able to best judge whether the maximum heights identified in the draft Plan are appropriate. Question how the proposed maximum heights have been set at this stage if no analysis of such impacts currently exists, or how this approach could be considered to conform with the requirements of London Plan policy D3.	regarding the matters raised.	
Historic England has also updated our advice on tall buildings	Comment noted.	No change proposed.

Policy D3 - Design of Housing

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Suggestion to please add to the policy: Swift bricks to be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development.	Policy D3 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with policy NE2. We propose to update policy NE2 (Biodiversity) to include a requirement for the provision of Swift bricks in suitable developments.	No change proposed.
"Swift Bricks" are a universal nest brick for small bird species as well as for Swifts and should be installed in all new developments including extensions, in accordance with best-practice guidance, to provide	Policy D3 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with policy NE2. We propose to update policy NE2 (Biodiversity) to include a	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
sufficient permanent nest sites to save these endangered birds.	requirement for the provision of Swift bricks in suitable developments.	
Swift bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance, to provide sufficient permanent nest sites to save these endangered birds.	Policy D3 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with policy NE2. We propose to update policy NE2 (Biodiversity) to include a requirement for the provision of Swift bricks in suitable developments.	No change proposed.
Suggestion; please could swift bricks (nest bricks) be added to all new housing developments.	Policy D3 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with policy NE2. We propose to update policy NE2 (Biodiversity) to include a requirement for the provision of Swift bricks in suitable developments.	No change proposed.
Support for high design standards in Camden.	Support welcomed.	No change proposed.
We support the Council's approach to the design of housing. However, we think the current wording of this policy misses the opportunity to apply the design standards to other alterations and extensions of buildings. It is suggested that the wording of draft Policy D3 is amended at Part iii) to reference residential apartment buildings as well as existing homes and to make it specific	Support welcomed. Comments noted. Policy D3 applies to all types of housing development. It is not considered necessary to amend the wording.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
that this policy references new homes delivered by upward extensions.		
Housing space standards based on recommended square meterage taken from the London Plan 2019 (Table 3.1) should not just meet criteria as tick box exercise, but provide spaces that allow for a flexibility in layouts and adaptable for family groups.	Comments noted	No change proposed.
Re: D3 Part A i); there is concern that a direct reference to ensure Supplementary Guidance is met in a planning policy both elevates the guidance to a status it should not have and is not how the GLA applies their Housing Design Standards LPG. Reference to the Supplementary Planning Guidance should therefore be removed from part A (i).	We propose to update the policy to make it clear that developments should have regard to the supplementary planning guidance produced by the Mayor and the Council, rather than must meet them, to reflect that there are materials consideration in decision making, but not part of the development plan.	Change proposed.
Re: D3 Part A i); there is concern that a direct reference to ensure Supplementary Guidance is met in a planning policy both elevates the guidance to a status it should not have and is not how the GLA applies their Housing Design Standards LPG. Reference to the Supplementary Planning Guidance should therefore be removed from part A (i).	We propose to update the policy to make it clear that developments should have regard to the supplementary planning guidance produced by the Mayor and the Council, rather than must meet them, to reflect that there are materials consideration in decision making, but not part of the development plan.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support the aspiration for all housing development to be designed and built to create high quality, accessible homes	Support welcomed.	No change proposed.

Policy D4 - Extensions and Alterations

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Please add to the policy: Swift bricks to be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development.	Policy D4 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with policy NE2. We propose to update policy NE2 (Biodiversity) to include a requirement for the provision of Swift bricks in suitable developments.	No change proposed.
Roof extensions are unlikely to provide suitable accommodation for large families therefore we suggest the wording in relation to 'overcrowding and create a more family-friendly borough' is not sufficiently precise to make the assessment of less than substantial harm.	The policy states that "roof extensions will be supported in principle where they do not adversely impact on designated heritage assets or their setting in accordance with Policy D5 (Heritage)." Where a proposed roof extension may cause harm to, or loss of the significance of a designated heritage asset then evidence should be submitted as part of a Heritage Statement to justify this. Where a development proposal will	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	lead to less than substantial harm to the significance of a designated heritage asset, the Council will take into consideration the nature and scale of the proposed development and the public benefits gained through the creation of additional residential floorspace and / or additional homes and weigh these against the harm to the significance of the heritage asset. When assessing proposals we will give significant weight to the need to deliver new homes and create a more family friendly borough, in addition to the extent to which the proposal delivers measures that respond to the climate and ecological emergency in a sensitive manner.	
Object because many unfortunate roof extensions may have been built over many years when different or less effective policies applied. Such inappropriate roof extensions should not provide precedent in assessing applications. The same comment applies to "prevailing roof heights".	Comments noted. The approach taken in the policy is in line with para 124 part e) of the NPPF in relation to upwards extensions/ dormer roof extensions.	No change proposed.
"Swift Bricks" are a universal nest brick for small bird species as well as for Swifts and should be installed in all new	Policy D4 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
developments including extensions, in accordance with best-practice guidance, to provide sufficient permanent nest sites to save these endangered birds.	enhancements in line with policy NE2. We propose to update policy NE2 (Biodiversity) to include a requirement for the provision of Swift bricks in suitable developments.	
Swift bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance (there is a British Standard - BS 42021:2022,) to provide sufficient permanent nest sites to save these endangered birds.	Policy D4 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with policy NE2. We propose to update policy NE2 (Biodiversity) to include a requirement for the provision of Swift bricks in suitable developments.	No change proposed.
Wherever there is an opportunity please could it be a requirement for swift brick (nest bricks) to be inserted. Swifts are the most extraordinary birds, arriving in London in early May and giving a huge amount of pleasure. These birds are on the Red list, the highest conservation priority list.	Policy D4 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with policy NE2. We propose to update policy NE2 (Biodiversity) to include a requirement for the provision of Swift bricks in suitable developments.	No change proposed.
Too much of Camden is in conservation zones, which makes it much more difficult to alter or extend buildings. The council is effectively blocking the 'permitted development' in large parts of the borough.	Comment noted	No change proposed.
Para 12.56 More rigorous enforcement is needed, refer to Howitt Close Proposals.	Comment noted. This is not a matter for the local plan. We have passed the comment on to the relevant Council service.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Para 12.56 Add " Dormer windows and rooflights in front roof slopes and excessively large dormers to side slopes will be resisted"	The wording proposed is considered overly restrictive. No additional wording is considered necessary. Further guidance on the Council's expectations on roof extensions is set out CPG on Home Improvements.	No change proposed.
Strongly object. Firstly, in Primrose Hill the configuration of terraced houses means that a roof extension would not normally address problems of overcrowding. This is because, if a house is undivided, an extra storey on a house increases the size of the whole house, already substantial in size. If the house is subdivided, the smaller unit, which might be overcrowded, is normally the lower ground floor flat, which cannot benefit from the addition of a roof extension. Secondly, the effect of the addition of a roof extension to a house is primarily to add value and so make homes even more unaffordable. Thirdly, the loss of original roofs with valley gutters removes ideal locations for air-source heat pumps and PV installations. We urge that the text from 'Roof extensions to listed buildings, or within conservation areas, will be supported …' to '… in a sensitive manner.' be deleted.	It is appropriate and reasonable for the plan to state that roof extensions will be supported provided they do not adversely impact on the designated heritage asset. It should also be noted that it's possible to add PV to roof extensions and that ASHPs are usually installed at ground, not roof, level. We are also proposing to update para 12.56 to ensure consistency with the NPPF.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
We object to this naïve and potentially damaging provision. In the PHCA there are original 'true' mansards in Chalcot Square, but the point is that they are exceptional. There are also terraces and crescents without mansards, sometimes with hipped roofs, sometimes with roofs hidden behind parapets. These distinctions are key to the significance of the conservation area. Planning policy should recognize these distinctions as significant. We urge that section 12.57 be deleted.	Comments noted. We propose to delete this section of para 12.57.	Change proposed.
Suggestion that wording is added into Policy D4 to specifically reference that extending existing buildings to deliver new homes is acceptable in principle subject to meeting relevant design standards and providing benefits to the existing buildings.	We propose to update the wording of the supporting text to explain that extensions to existing buildings are also a way of delivering additional homes.	Change proposed.
Support for policy D4, in particular part B. However this should recognise that roof extensions can deliver new housing as well as extensions to existing homes.	Support welcomed. We propose to update the policy so it will apply to existing buildings where new residential floorspace is proposed and / or where additional homes are created.	Change proposed.
Roof extension rarely result in additional housing/ affordable units. It is suggested that the test for impacts on heritage assets should be 'causes harm' as opposed	We propose to update the supporting text to align with the NPPF to say "Where a proposed roof extension may cause harm to, or loss of the significance of a designated heritage	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
to 'less than substantial harm'.	asset then evidence should be submitted as part of a Heritage Statement to justify this. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will take into consideration the nature and scale of the proposed development and the public benefits gained through the creation of additional residential floorspace and / or additional homes and weigh these against the harm to the significance of the heritage asset. When assessing proposals we will give significant weight to the need to deliver new homes and create a more family friendly borough, in addition to the extent to which the proposal delivers measures that respond to the climate and ecological emergency in a sensitive manner."	
The plan should recognise the significance of various distinct roof forms within the borough.	Comments noted. We propose to delete this section of para 12.57.	Change proposed.
Para 12.56; Roof extensions to listed buildings or within conservation areas should only be supported exceptionally.	The policy is clear that roof extensions to heritage assets will only be supported when they do not adversely impact a heritage asset. No change to wording is considered necessary.	No change proposed.
Para 12.57; The text should be amended to	We propose to update the supporting text to read	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
remove the implication that a mansard roof extension is generally acceptable.	"On terraced houses of the Georgian and Victorian eras, mansards may often be the most appropriate form of roof extension. However, this will depend on the age and style of the building."	

Policy D5 – Heritage

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Concern regarding apparent incompatibility of conserving heritage and provision of tall buildings.	All applications for tall buildings would be assessed against policy D5 Heritage, which aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, and policy D2 on tall buildings, which includes consideration of historic context.	No change proposed.
The use of key assets (such as pubs) should be included in heritage considerations.	Comments noted. Para 12.74 of the supporting text says "One use that is of particular importance to the character of conservation areas are pubs, especially when they are in located in historic buildings. The Council will protect pubs in accordance with Policy SC6 Public houses."	No change proposed.
There are far too many conservation areas, and	Comment noted. The approach to conserving	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
they cover too much of the borough. The Council should encourage development and densification with protections in place for genuinely notable parts of town.	Camden's historic environment set out in the Plan is consistent with national policy.	
There is enormous pressure to put a tall building wherever it can go because the demand for housing so far outstrips supply.	Comment noted.	No change proposed.
The Council does not give sufficient weight to heritage harm (e.g. Museum St and GOSH). The Council has allowed development that very clearly does not preserve, let alone enhance, the character and appearance of the Bloomsbury CA.	Comment noted.	No change proposed.
The weighing of loss or harm against the public benefits of damage caused to the heritage asset is where the problem resides. It is clear to me that the weighing should not be done by the Council, but by a broadly based panel of advisors.	Comments noted.	No change proposed.
General support for policy D5 Part G ii). Alterations to undesignated assets need much greater protection in order to preserve local character etc..	Support welcomed. Comment noted.	No change proposed.
Please refer to our written representations on behalf of One Housing and Countryside Partnerships	Comments noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
We note your protection of non-designated heritage assets, but would like to see an acknowledgement that built heritage is less likely to be formally protected in deprived and working-class areas.	Comment noted. It is not considered that such a reference is necessary in the Local Plan. Conservation area designation is not a matter for the Plan.	No change proposed.
The CAACs suggest omission of word "optimum" at D5 B ii.	The term 'optimum viable use' is consistent with the NPPF. No change to wording is considered necessary.	No change proposed.
The CAACs request clarification on who will judge D5 H iv?	We propose to update the policy wording to refer to suitable qualified heritage consultants, architects and contractors, instead of relevant specialists. The suitability of consultants will be decided by the Council.	Change proposed.
The presumption should be in favour of environmental improvements, e.g. double glazing and air source heat pumps.	Policy D5 part E states that the Council will support proposals for environmental improvements provided they do not cause significant harm to the special historic or architectural interest of the heritage asset. No change to wording is considered necessary.	No change proposed.
The CAACs suggest that at para 12.68 Replace "current concerns" with "environmental concerns"	We propose to update the supporting text to reflect this comment.	Change proposed.
Para 12.70; Add "Dormer windows and rooflights in front roof slopes and excessively large dormers to side slopes will be resisted".	No additional wording is considered necessary. Further guidance on the Council's expectations on roof extensions is set out in Policy D4 (Extensions and Alterations) and the Home Improvements CPG.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Is para 12.74 (Re: protection of pubs) enforceable?	Draft New Local Plan policy SC6 sets out the Councils approach to protection of public houses. Proposals to change the use of or redevelop pubs will not be accepted unless they meet strict criteria set out in the policy. Enforcement is not a matter for the local plan.	No change proposed.
We note para 12.70;	Comments noted.	No change proposed.
Strongly support for Policy D5, and paras 12.60-12.90.	Support welcomed.	No change proposed.
We welcome the addition of 'optimum' in policy D5 Bii.	Support welcomed.	No change proposed.
Welcome policy D5 Part D.	Support welcomed.	No change proposed.
Welcome policy D5 Part E. We have actively encouraged retrofitting in our conservation area.	Support welcomed.	No change proposed.
We welcome the strengthened policy (D5 H)	Support welcomed.	No change proposed.
The text in the 2017 Local Plan at D2 section 7.42-7.43 'Enhancing the historic environment' has not been included in the current draft Plan. We urge for the inclusion of the text or similar.	We propose to re-instate paras 7.42 and 7.43 from the current local plan.	Change proposed.
We welcome para 12.62.	Support welcomed.	No change proposed.
We welcome para 12.63.	Support welcomed.	No change proposed.
We welcome paras 12.64-12.66.	Support welcomed.	No change proposed.
We welcome para 12.67.	Support welcomed.	No change proposed.
The first sentence in para 12.68 is not consistent with the statutory obligation on LPAs to pay special attention to the	We consider that the supporting text is aligned with the policy and is not inconsistent with statutory obligations. No change to	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
desirability of preserving or enhancing the character or appearance of conservation areas, and is not consistent with Plan policy D5 G i. It should be deleted. This statement: '[The Council will:] require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area'. The first sentence at 12.68 should be deleted.	wording is considered necessary.	
Conservation Area Appraisals are focused on the significance of heritage assets which remain relevant. Camden's conservation area appraisals are SPD to be read in conjunction with other Planning Guidance such as 'Camden Home Improvements CPG 2021, and Retrofitting Planning Guidance. These provide effective updates to the conservation area appraisals. The second sentence at 12.68 should be deleted from the Plan.	We propose to update the second part of para 12.68. Conservation Area Appraisals are material considerations in planning decisions. Camden Planning Guidance sits alongside Conservation Area Appraisals, it does not replace or update Conservation Area Appraisals though	Change proposed.
We welcome this strengthened policy statement in para 12.70, which should be applied throughout the Plan.	Support welcomed.	No change proposed.
We welcome para 12.74 on retaining uses which contribute to the character of a conservation area.	Support welcomed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
We request the addition of a clause to D5 highlighting the importance of Camden's rich heritage of street furniture, which should be protected and preserved by service providers and developers.	The suggested additional clause is not considered necessary.	No change proposed.
Support the approach of D5. Consideration should be given to a building's optimum viable use to ensure that listed buildings are adaptable to facilitate alternative uses where the existing use is no longer fit for purpose.	Support welcomed. We propose to update the policy to state "Proposals which conserve or enhance heritage assets in Camden, sustaining and enhancing their significance and making a positive contribution to local character and distinctiveness will be supported. In particular, proposals that bring redundant or under-used buildings and areas, including those on the Heritage at Risk Register, into appropriate and viable use consistent with their conservation, will be encouraged."	Change proposed
Suggestion to amend the first sentence of Policy D5 Part E as follows: "The Council will support proposals to adapt and improve listed buildings, and buildings within conservation areas, to reduce energy demand, <u>strengthen resilience,</u> mitigate the impacts of climate change and ensure they are adaptable to a changing climate provided they do not cause significant harm to the special historic or	We propose to update the policy to include the wording 'strengthen resilience'.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
architectural interest of the heritage asset."		
Add an additional part after Part E as follows: "The Council will support proposals which seek to provide the optimum viable use to secure the retention of listed buildings."	We propose to update the policy to state "Proposals which conserve or enhance heritage assets in Camden, sustaining and enhancing their significance and making a positive contribution to local character and distinctiveness will be supported. In particular, proposals that bring redundant or under-used buildings and areas, including those on the Heritage at Risk Register, into appropriate and viable use consistent with their conservation, will be encouraged."	No change proposed.
We fully embrace our responsibility to the long term stewardship of both designated and non-designated heritage assets.	Comments noted.	No change proposed.
We would welcome an acknowledgement of the benefits that that new external and internal accessibility works, such as passenger lifts, ramps, etc can deliver to improving and enhancing the quality of stock in the market.	Para 12.81 sets out the approach to accessibility in listed buildings. No additional wording is considered necessary.	No change proposed.
Policy D5 part C which is not considered sound and not consistent with the NPPF.	We propose to update the wording to part C of the policy to ensure it is consistent with the NPPF.	Change proposed
Policy D 5 Part C fails to note the weight that can be given to securing the "Optimum Viable Use" of a heritage asset which is	Comments noted. We propose to update the wording to part C of the policy to ensure it is consistent with the NPPF.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
a fundamental principle of conservation and enhancement of designated assets.		
There is an opportunity to highlight physical accessibility benefits to listed buildings also within Policy D5. We would encourage the LPA to consider references to Local Development Orders and Local Listed Building Orders within the Local Plan as an effective means of delivering alterations to buildings.	Para 12.81 sets out the approach to accessibility in listed buildings. No additional wording is considered necessary. The introduction of Local Development Orders and Local Listed Building Orders is not a matter for the Local Plan.	No change proposed.
The principle of "protect and conserve" heritage seems to have been watered down in the proposed Camden Local Plan. This must not be allowed to happen. If anything protection and conservation of heritage should be strengthened.	As set out in Draft Local Plan paragraph 12.61, the Council places great importance on preserving the historic environment. Policy D5 Part A states that the Council will conserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings.	No change proposed
Heritage dictates the character of an area. Losing heritage assets or imposing inappropriate changes to buildings should be viewed with extreme care and sensitivity.	Comments noted.	No change proposed.
The views if heritage groups and residents should take priority over those with short term commercial interests who diminish the value of heritage assets.	The consultation process enables all interested parties to give their views on the local plan, or indeed specific development proposals coming forward. Further details of how the Council engages with residents as part of the planning	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	process is set out in the Statement of Community Involvement.	
Heritage areas also encourage residents within them to care about their environment.	Comments noted.	No change proposed.
The Camden Local Plan is likely to have been prepared by people who do not live in the area without knowledge of the neighbourhood. Proposed changes may benefit commercial proprietors and developers but what benefit is there for Camden Council?	Comments noted.	No change proposed.
If heritage buildings are demolished or inappropriately altered it damages the character of an area and ruins the street scape. New development cannot bring back the historic character that has been destroyed. Decision makers should make use of local knowledge to understand how valuable old buildings and their setting are to the character of an area.	Comments noted. Draft policy D5 sets out the Council's approach to preserving and enhancing Camden's rich and diverse heritage assets and their settings.	No change proposed.
Buildings of historic interest should have maximum protection from inappropriate development. Wording in the policy should underline harm that tall buildings can have on a conservation area.	Applications for tall buildings will be assessed against policy D2, which includes criteria to ensure the impact of development pays attention to the historic context of the buildings surroundings, as well as Policy D5 on Heritage, which resists development that causes harm to the character,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	appearance, and / or setting of a conservation area.	
A building which has its own unique historic quality may be "in the way" of a development but must be protected especially if it adds to the overall character of the area.	Comments noted. Draft policy D5 sets out the Council's approach to preserving and enhancing Camden's rich and diverse heritage assets and their settings.	No change proposed.
Euston Square Gardens MUST be restored as originally designed. The revised Local Plan MUST underline and reinstate the importance of Euston Square and its Gardens – this is a key heritage asset.	The Council's policy approach to the Euston area, which includes Euston Square Gardens, is set out in the Euston Area Plan. We have shared his comment with the team preparing the Euston Area Plan.	No change proposed.
The balance between the competing interests of University, Commerce, Tourism and Residential amenity needs to be restored. Quality of life should not be a football to be kicked about by decision-makers who do NOT live there.	Comments noted	No change proposed.
Do not impose unnecessary changes on an area which is already "liveable" which, as a result, ends up becoming a place where no one actually wants to live. Without residents an area such as South Camden would lose much of the neighbourhood's essential character.	Comments noted.	No change proposed.
Maintenance of existing roads and pavements should take precedence over creating new open spaces.	Comments noted. The maintenance of roads and pavements is not a matter for the local plan. We have shared this	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	comment with the relevant Council service.	
There is no reason for residential areas of south Camden to be colonised by UCL or the University of London or by large businesses, such as HS2 limited, or TFL (to the detriment of local residents). Public streets should not be taken over for private use.	Comments noted.	No change proposed.
The creation of the "Knowledge Quarter" is obviously beneficial for businesses, institutions and large corporations, but provides few benefits for residents who live here. Economic uplift should be balanced with quality of life for all.	Comments noted.	No change proposed.
There should be a focus on creating a better balance between existing residential needs and economic development. Residents are not averse to positive change but resent being steam rollered by decision makers.	Comments noted. Policy S1 sets out our intension to ensure development in the South of the Borough contributes to the area's continued success and London-wide role, while delivering social, economic and environmental benefits for Camden's residents, making the area a more habitable, climate resilient and inclusive place.	No change proposed.
Policy D5 part G i) is not considered consistent with para 12.68. The issue of not reflecting current concerns such as the climate emergency (regardless of how serious this is) is irrelevant to the appraisal	We consider that the first part of para 12.68 is consistent with Policy D5 criteria G (i). However, we propose to update the second part of para 12.68.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
of significance and has nothing to do with preserving or enhancing the character of the CA.		
In order to be consistent with the NPPF "convincingly" should be removed from Policy D5 Part C.	We propose to update the wording to part C of the policy to ensure it is consistent with the NPPF.	Change proposed
In order to be consistent with the NPPF "convincingly" should be removed from Policy D5 Part C.	Comments noted. We propose to update the wording to part C of the policy to ensure it is consistent with the NPPF.	Change proposed
The approach in policy D5 E is welcomed. The policy wording is open to interpretation of how this can be applied in practice, and the provision of clearer guidance on the type of sustainability measures that may be considered appropriate would be beneficial.	Support welcomed. We propose to include additional wording to provide further detail of what is expected.	Change proposed
Support the inclusion of part E of Policy D5, which supports the adaptation of listed buildings to meet energy and sustainability targets. It is suggested that the same approach be applied to works that will enable significant improvements to the accessibility – and safety – of buildings. It is therefore suggested that an additional paragraph be added to Policy D5.	No additional wording is considered necessary here, as it is considered this matter is already covered by the policy. Access in listed buildings is also covered by para 12.82.	No change proposed.
Giii and Hiii are welcomed. The following should be included in both: "...and impacts on important views out of the conservation area from tall buildings".	Support welcomed. Comments noted. It is considered that the suggested wording is appropriately covered in para 12.70 in respect of conservation areas and	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	para 12.80 in respect of listed buildings.	
At D5 Under point C, please elaborate on what measure will be used to establish whether the public benefits of a proposal convincingly outweigh any harm.	We propose to amend the wording to part C of the policy to ensure it is consistent with the NPPF.	Change proposed.
Please amend the text in para 12.76 to protect all trees in the public realm	The Plan's approach to trees is set out in policy NE3 – Tree Protection and Planting, which seeks to protect existing trees.	No change proposed.
Delete 'where appropriate' from the policy D5 A.	The wording of part A is considered appropriate. The Council cannot require enhancement of heritage assets in every proposal.	No change proposed.
Policy D5 part G i) is too weak. *Delete 'where possible'*	The wording is considered appropriate. The Council cannot require enhancement of heritage assets in every proposal.	No change proposed.
Recognition of the cultural and historic significance of heritage assets. There are many examples across the Borough where newer developments enhance the setting of conservation areas and listed buildings.	Comment noted.	No change proposed.
Part A needs to be applied in hierarchy – nationally listed, conservation, areas, then locally listed, to encourage development to be considered on a case by case basis.	All proposals are considered on a case-by-case basis. No change is considered necessary.	No change proposed.
Part G iii needs to allow for more flexibility as land outside of conservation areas need to be	Development proposals are assessed on the merits against all relevant policies in the Plan. It is	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
assessed for more than just their impact on conservation areas when considering their suitability.	reasonable and appropriate for the plan resist development outside of a conservation area that causes harm to the character or appearance of that conservation area.	
Support the policy aims to allow for the adaptability of historic buildings. Propose that the future use of historic buildings is considered in terms of alternative land uses. Consideration should be given to a building's optimum viable use to ensure that listed buildings are adaptable to facilitate alternative uses where the existing use is no longer fit for purpose.	Support welcomed. We propose to update the policy to state that, proposals that bring redundant or under-used buildings and areas, including those on the Heritage at Risk Register, into appropriate and viable use consistent with their conservation, will be encouraged.	Change proposed.
Para 12.78 could be reworded to note 'a presumption in favour of the preservation and enhancement of listed buildings', to ensure heritage values are sustained.	The suggested wording is not considered to be consistent with the NPPF.	No change proposed.
Broad support for policy D5 part B and C.	Support welcomed.	No change proposed.
Welcome and support policy D5, subject to certain comments. that there should be a reference to the conservation of heritage significance within the first clause of policy D1 to reflect the requirements of the NPPF, while the policy itself could be titled Historic Environment.	Support welcomed. We propose to rename the policy 'Historic Environment' and amend the wording to ensure that it is consistent with the NPPF.	Change proposed.
Part B and C effectively replicate paras 207 and 208 of the NPPF. It is	To be considered. We propose to update the policy to refer to	To do.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
considered a missed opportunity to set out how change to the historic environment will be managed. This section could include □ Promoting heritage-led regeneration □ Ensuring the local historic environment is a key element of place-making □ Supporting proposals that provide solutions for assets a on the Heritage at Risk register □ Conserving key views	promoting heritage led regeneration and ensuring that the local historic environment is a key element in place-making. The policy already refers to conserving key views and the Heritage at Risk Register so no further changes are considered necessary.	
It would be helpful to know whether the borough's characterisation strategy (which does not appear in the evidence base) has been updated as part of the plan review process and to be able to understand whether this contributes to the requirements of NPPF para 31.	The Character Study has not been updated as it is still considered to reflect Camden's context. It is available to view online, however we propose to include it on the evidence page for the new Local Plan.	Change proposed.
There needs to be clear cross reference to Chapter 8 to make clear that different considerations may be at play in relation to climate change-related interventions to heritage assets.	We propose to update the policy to make reference to the climate change chapter in the Plan.	Change proposed
Policy D5 I on Archaeology should be amended to bring it in line with NPPF	We propose to update this section of the policy to ensure it is consistent with the NPPF.	Change proposed
Suggested additional para about applying conditions to secure the implementation of written schemes of investigation	We propose to update the policy to include the changes suggested.	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
prior to commencement of demolition/alterations where appropriate and ensure the information has the appropriate level of publication.		
Request a phase is added to ensure that no development shall take place until satisfactory excavation and recording of the remains, where in situ preservation is not feasible.	We propose to update the policy to include the changes suggested.	Change proposed
It is suggested that the text should reference the Levelling Up and Regeneration Act, 2023, which places a statutory obligation on London Boroughs to maintain an Historic Environment Record.	The Historic Environment Record is referenced in the supporting text to this policy. No additional wording is considered necessary.	No change proposed
It is recommended that with reference to London Plan Policy HC1, the potential of archaeology to contribute to design, place-making and social wellbeing should be assessed during the design process and enhancement opportunities identified.	The London Plan forms part of the Development Plan for Camden and is therefore taken into consideration as part of the decision making process as necessary. No further wording is therefore considered necessary.	No change proposed
Policy D5 part J does not conform to NPPF para 206. We recommend a separate clause to the policy covering registered parks and gardens.	We propose to update this section of the policy to ensure it is consistent with the NPPF.	Change proposed

Policy D6 – Basements

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Neighbouring properties should be extended to infrastructure	We propose to amend the supporting text at para 12.6 to reflect this comment.	Change proposed
Strongly support the policy approach.	Comment noted.	No change proposed
The Party Wall Act specifically excludes damage caused by demolition. Neighbours need protection from demolition works which is often a precursor to basement construction	We note this comment, however demolition works are often permitted development.	No change proposed.
Policy D6 C iv, Add "except in relation to a party wall, in which case requirement E affords protection to adjacent properties".	The policy has been written to ensure that garden space/ green margins are retained. We propose to add text to clarify that the criteria applies to a new access or lightwell. There is no need to refer to part E as all other parts of the policy will reply	Change proposed
FRAs - there can still be a risk of sewer flooding outside of areas of flood risk	Noted. We have reviewed our flood risk mapping, which shows areas where the risk of sewer flooding is highest.	No change proposed.
Refer to the installation positively pumped devices in the main policy text.	It is proposed that the requirement for positive pumped devices will be included in the main policy text, amendment to Part G of the policy.	Change proposed
Clarify that basement construction often involves extensions	We propose to add reference to extensions in 12.3 to reflect this comment.	Change proposed.
Add reference to the setting of heritage assets	We propose to add additional wording to A.v. to address this comment	Change proposed
Make reference to protecting the existing garden level	The proposed wording would potentially inhibit even the construction of a	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	small lightwell or basement extension.	
We note the definitions at 12.113	Comment noted	No change proposed.
Where gardens need to be reinstated be more specific about what is required: i.e. ensure impacts are minimised and residual impacts will be addressed through full reinstatement. Plant types should be those pre-existing	Agree that there is an opportunity to enrich the biodiversity value and improve the aesthetic qualities of the garden – it may not be appropriate to go back to pre-existing condition if this was poor. Planning cannot control specific plant types. We propose to make changes to B (viii) and 12.29 to reflect this comment.	Change proposed
The supporting text should reference impacts on the appearance, as well as character, of conservation areas	The proposed change is not necessary as the policy references heritage assets (including conservation areas) and other Local Plan policies will apply, including D5 Heritage.	No change proposed.
Specify the frequency of monitoring (i.e. of basement construction)	This level of detail is considered to be more appropriate for supplementary planning guidance.	No change proposed.
Add reference to heritage assets and conservation assets	Protecting the character and amenity of the area needs to be considered in context. The Plan needs to be read as a whole taking into account the heritage policy	No change proposed.
Ambiguity caused by references to "natural landscaping" in 12.22 and protection of gardens and trees in 12.29	Agree – we propose to set out relevant detail about garden reinstatement in one paragraph only to reflect this comment.	Change proposed
Support limits on the size of basements because their construction may impact on the health and wellbeing of neighbours.	Support welcomed .	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Would support the use of planning conditions and/or s106 agreements in relation to timescales/ hours of operation.	For most basement developments a CMP will be required which will deal with working hours. The CMP will be secured via a condition/obligation. We propose to add reference to Camden's Minimum Requirements for Contractors and Guide for Contractors	Change proposed
The definition of a basement / lower ground floor should be clarified.	The draft new Local Plan uses the same approach as the current Local Plan (and previous plans), which has been found sound at examination on more than one occasion. The approach has operated for a number of years without significant confusion. Further explanation on our approach is set out in Camden Planning Guidance on Basements.	No change proposed.
Object to the wording that matters/evidence will be subject to the Council's satisfaction and that "The Council will only permit basement development where..." The criterion in A should avoid *unacceptable* harm	The wording is considered reasonable. This form of wording is used in the current Local Plan for this and other policies, which have been found sound at examination. Most basement schemes will be subject to a Basement Impact Assessment (BIA) which by its nature allows a number of matters to be explored in further detail. The BIA is audited by an engineering firm appointed on behalf of the Council: they will often need to seek clarifications or further information from the applicant.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	The Council has an established process, that is, the use of BIAs which provides a mechanism for applicants to prepare acceptable schemes. Community groups have made clear they are extremely concerned about the impacts of basement construction on neighbouring properties and the local area. We consider it is reasonable to take a robust approach and expect basement schemes to deliver the highest possible standards.	
Criteria C iii and iv appear to be contradictory.	The text in iv is intended to relate to new basement accesses and lightwells rather than larger basement construction extending into the garden. We propose to update the text to clarify that iv is intended to apply to a new access or lightwell.	Change proposed
Clarify what is an acceptable setback	Setback is covered in para 12.112: "Sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees".	No change proposed.
Why restrict kitchens and bathrooms in basements? Mitigation can be provided.	As set out in draft Local Plan paragraph 12.115 this is due to the risk of sewer surcharge, and as provision of kitchens and bathrooms increases the possibility of the basement being used as sleeping accommodation / self-contained home.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Security for expenses is a matter under the Party Wall Act and should not be dealt with through planning	Although this is a matter under the Party Wall Act, the wording, which also appears in the adopted Local Plan which was found sound at examination, has proved useful in drawing attention to various roles/responsibilities. It encourages householders to follow best practice and assist in avoiding potential neighbour disputes.	No change proposed.
Is the Council's approach that no basements will be permitted	The Council has approved numerous basement applications. The approach in the draft Plan is similar to that set out in the adopted Local Plan. Basement proposals are permitted where it is demonstrated that they would not cause harm to amenity, effect the stability of buildings, cause drainage or flooding problems or damage the character of areas or the natural environment.	No change proposed
Some basement policy criteria are arbitrary, not supported by evidence and impose burdens on developments	The approach set out in the draft Local Plan is an established risk-based, evidence-based and proportionate approach that has operated in a similar form since 2010 and has been found sound at public examination on more than one occasion. It has ensured that appropriate basement schemes are approved, whilst preventing/ minimising	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	impacts on people living close by.	
Recommends the adoption of a simple criteria based policy. We consider the Council's draft policy is not sound because it is not Positively Prepared, it is not Justified by the Council's own evidence, and it is not Effective. When we say the Council's policy will not be Effective, we mean that it will not effectively distinguish "good" basement development from bad basement development. It must be recognised that planning policy cannot itself prevent a proposal being implemented in a way which causes an adverse impact on the structural stability of neighbouring buildings, just as it cannot prevent a proposal being implemented in a way which causes a nuisance	We consider that the policy wording is proportionate and reasonable. The approach proposed is an established risk-based and evidence-based approach that has operated in a similar form since 2010 and has been found sound at public examination on more than one occasion. The Council considers that the impacts of basement development on neighbours and the local area can be disproportionately high. This has been demonstrated by the historic volume of complaints from residents and community groups about these schemes and survey data. Planning can and does help to alleviate potential risks that may otherwise arise at construction stage due to the comprehensive approach taken by the BIA process. The policy and BIA process has operated successfully in Camden for many years, with numerous basement schemes being approved.	No change proposed.
No evidence has been provided to support the assertion that basement development has greater negative impact than other forms of development	The policy approach is supported by detailed technical geological, hydrogeological and hydrological evidence prepared by Arup, as well as local survey evidence.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Some basement developments having a greater negative impact should not be the basis for imposing onerous requirements on all basement schemes	There are a range of potential harms and impacts that could arise where basement schemes are poorly designed or constructed. Before these policies were introduced, there were many significant concerns raised by residents and community groups about this particular type of development. A number of neighbourhood plans in the borough also contain policies for basement development. The policy was developed having regard to the type and size of basement schemes coming forward in the Borough and was developed in conjunction with engineers and having considered matters such as soil conditions, hydrology and the types of housing development/construction methods present in Camden. BIAs take a proportionate approach. It operates on a case-by-case basis requiring greater information where a scheme is likely to present greater risks or impact. Small scale basements may not be taken through the full process where the effects are considered to be insignificant.	
Ground level needs to be correctly considered.	The approach in the Local Plan has operated for many years and considered appropriate.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The policy should have criteria that can be assessed objectively by a third party. It should not be down to the Council's potentially arbitrary opinion. The wording is negatively rather than positively written. Proportionate evidence should be provided to support any requirement. No evidence has been provided of the greater harm caused to structural, ground or water conditions by basement developments compared to other types of development. Alternative wording is suggested.	The policy wording and approach is considered to be proportionate and reasonable. It is an established risk-based and evidence-based approach that has operated in a similar form since 2010 and has been found sound at public examination on more than one occasion. The policy approach is supported by detailed technical geological, hydrogeological and hydrological evidence prepared by Arup, as well as local survey evidence. Basement schemes are taken through a Basement Impact Assessment (BIA) process which is independently audited by a third party engineering firm. The wording reflects the assessment process intrinsic to the BIA which such schemes need to pass. The BIA methodology is deployed for this type of residential development due to the particular risks and impacts known to be associated with basement construction. The BIA process follows a proportionate approach with greater information/ data required for basement schemes involving greater risk / complexity Although the matters considered may also be relevant for other types of	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	development, the combined impact and the potential magnitude of risk justifies specific consideration for basement schemes.	
Part B is not necessary	Both parts of the policy are needed: Part A sets overall objectives for basement schemes. Part B explains how the Council will determine whether basement impacts are acceptable	No change proposed.
Adequate reasoned justification or proportionate evidence has not been provided to support the policy's restrictions on basements. Suggest wording should be changed, subject to sufficient reasoned justification and proportionate evidence being provided, to 'The Council will permit basement development where it: i. Does not cause unacceptable harm to the character and amenity of the area. ii. Protects trees of townscape or amenity value. iii. Does not cause an unsympathetic alteration to the leafy and well-treed character of the Borough's gardens.	The policy approach is supported by detailed technical geological, hydrogeological and hydrological evidence prepared by Arup, as well as local survey evidence. There are a range of potential harms and impacts that could arise where basement schemes are poorly designed or constructed. Before these policies were introduced, there were many significant concerns raised by residents and community groups about basement development. A number of neighbourhood plans in the borough also contain policies for basement development. The Council takes a balanced approach to assessing basement schemes, with well-planned and designed schemes are being approved. We have extended the size criteria to restrict basements beneath	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	gardens (except for new accesses and lightwells): this reflects growing concern about the cumulative loss of gardens on drainage and biodiversity at a time when climate change risks are increasing.	
Adequate reasoned justification or sufficient evidence have not been provided for the criteria set out in Part E. Suggest amended wording, subject to sufficient reasoned justification and proportionate evidence being provided for each item	The draft new Local Plan uses the same approach as the current Local Plan (and previous plans), which has been found sound at examination on more than one occasion. The approach has operated successfully for a number of years. The policy approach is supported by detailed technical geological, hydrogeological and hydrological evidence prepared by Arup, as well as local survey evidence.	No change proposed.
No evidence has been provided that basement construction or basements overall have worse performance in terms of carbon emissions compared with other types of development.	The Council has commissioned evidence work to support this approach which will be published alongside the Reg 19 version of the draft new Local Plan.	No change proposed
No limitations on the size of basements in terms of area, extent or depth should be place on basement development without adequate reasoned justification and sufficient supporting evidence.	The draft new Local Plan uses the same approach as the current Local Plan (and previous plans), which has been found sound at examination on more than one occasion. The policy approach is supported by detailed technical geological, hydrogeological and hydrological evidence	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	prepared by Arup, as well as local survey evidence. The restriction on the extent and depth of basements is a balanced approach recognising the need for homeowners to increase living space within their home but recognising the significant impacts large and complex basement schemes can have on immediate neighbours. The approach also recognises the densely built up nature of Camden with many residents sharing a Party Wall with adjoining properties.	
No greater requirements or restrictions should be place on basement development in terms of protection of listed buildings or other heritage assets than for other types of development	Heritage assets for reasons for age, their relative fragility and the presence of shared party walls means they could be vulnerable to the impacts of basement construction – the impacts/ risks would be explored further through the BIA. The draft new Local Plan uses the same approach as the current Local Plan (and previous plans), which has been found sound at examination on more than one occasion. The policy approach is supported by detailed technical geological, hydrogeological and hydrological evidence prepared by Arup, as well as local survey evidence.	No change proposed
The presence of basements and lightwells in the existing streetscape	The approach in the draft Local Plan is considered reasonable and	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
should not be a prerequisite for development.	appropriate, and has been a longstanding element of the Council's design policies. Introducing lightwells where they do not exist risks introducing an incongruous/ discordant feature that can harm heritage significance, such as the uniformity of a terrace.	
Security for expenses is a matter under the Party Wall Act and should not be dealt with through planning	Although this is a matter under the Party Wall Act, the wording, which also appears in the adopted Local Plan which was found sound at examination, has proved useful in drawing attention to various roles/responsibilities. It encourages householders to follow best practice and assist in avoiding potential neighbour disputes.	No change proposed.
The assessment of a planning application should be based against objective, evidence-based criteria. Planning law, and there plans and policies, are meant to be written *in favour* of sustainable development being allowed (i.e. planning permissions being granted) unless there are evidence-based reasons against.	The draft new Local Plan uses the same approach as the current Local Plan (and previous plans), which has been found sound at examination on more than one occasion. Decisions on basement schemes are guided by the findings of the Basement Impact Assessment process. This work is verified on the Council's behalf by a third party engineering company. This takes into account relevant considerations applicable to basement design and construction and the approach is proportionate	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	in line with the scale and complexity of the basement. The Council uses the Burland Scale to establish the risk of damage to neighbouring properties from subsidence. The Council requires schemes to meet Burland Scale 1, equivalent to 'very slight' damage: this demonstrates that minor harms are not a barrier to a scheme being permitted.	
No comment on criterion B.	Noted.	No change proposed.
No reason or justification has been given for requiring basements to be subordinate to the host building or property	This is one of the size criteria which schemes are expected to meet. These size criteria have existed for a number of years and serve to limit the duration of basement construction and resulting impacts on residents. The draft new Local Plan uses the same approach as the current Local Plan (and previous plans), which has been found sound at examination on more than one occasion.	No change proposed.
No comment on criterion D.	Noted.	No change proposed.
Criterion E should say something like – 'Permission for basement development will be permitted unless' and refer to 'unacceptable harm' No evidence has been given to support the criterion on carbon offset.	The approach in the draft Local Plan is considered reasonable and appropriate. The draft new Local Plan uses the same approach as the current Local Plan (and previous plans), which has been found sound at	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	examination on more than one occasion. The Council has commissioned evidence work on carbon impact of basements which will be published alongside the Regulation 19 version of the draft new Local Plan.	
No comment.	Noted.	No change proposed.
No comment.	Noted.	No change proposed.
Security for expenses is a matter under the Party Wall Act and should therefore not also be dealt with under planning. Suggest a note or informative about the Party Wall Act is included in basement planning permissions.	Although this is a matter under the Party Wall Act, the wording, which also appears in the adopted Local Plan which was found sound at examination, has proved useful in drawing attention to various roles/responsibilities. It encourages householders to follow best practice and assists in avoiding potential neighbour disputes.	No change proposed.
Support for Burland Scale 1	Support welcomed.	No change proposed.
Reinstate Figure 12 from the Arup Study that shows the sand partings of old river tributaries that may carry groundwater during storm surges – relevant to Basements policy	The Arup study continues to form part of the evidence base for the Local Plan and will continue to inform the application of the basements policy. It is not considered necessary to include Figure 12 from the Arup study in the Plan.	No change proposed

Policy D7 - Advertisements and Signage

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The CAACs state that estate agent boards	Comments noted	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
should continue to be banned in CAs.		
The CAAC welcomes the provisions regarding Advertisements and Signage.	Support welcomed.	No change proposed.
The Neighbourhood Forum suggests there should be a clearer design strategy to proactively manage proliferation of street furniture and public realm developments. Unnecessary obstacles should be removed to benefit pedestrians. Pavement widening may be necessary at pinch points such as bus stops.	Comments noted. The matters raised are outside the scope the local plan, we have shared these comments with the relevant Council service.	No change proposed.
Re para 12.128; Please augment the text to say "Council will resist advertisements where they contribute to or constitute visual street clutter; <u>where they unfairly obscure neighbours' signs</u> or where they create an unsightly proliferation of signage in the area.	Comments noted. The additional text as suggested is not considered necessary as it does into more detail than we would usually seek to include in a Local Plan and is more appropriate for Camden Planning Guidance.	No change proposed.
Re: para 12.130; Please add text explicitly to prevent the placing of A-Boards in the public realm. This is a serious problem in our small streets, and the council currently has no power to remove them unless the premises has a licence for other furniture on the highway.	Comment noted. Temporary free standing signs of this nature are not considered to be development so does not require planning permission and therefore is not subject to local plan policies.	No change proposed.

Policy D8 – Shopfronts

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Suggestion to add "including light nuisance to neighbours" to A1 B iii.	The policy already refers to lighting as being a consideration in the determination of proposals for shopfront development. The supporting text states that lighting should be well designed so it does not cause light pollution. In addition policy A1 Protecting Amenity seeks to protect the quality of life of neighbours and occupiers and also refers to the impact of lighting. No change is considered necessary.	No change proposed.
The CAAC welcomes policy subject to provisions (below)	Support Welcomed.	No change proposed.
The CAAC requests that shopfront shutters should be internal and retractable, with some degree of transparency.	We propose to update the supporting text of Policy D8 Shopfronts to reflect this comment.	Change proposed.
The CAAC requests an additional clause re: other installations to shopfronts, e.g.) ventilation/ security cameras/ lighting. This should apply generally but if not, at least within CAs.	We propose to update the supporting text to reflect this comment.	Change proposed.
Re para 12.140; We are not sure what is meant by "transparent shopfronts" and would not wish to see full plate glass frontages with no stall risers in many locations in our area.	Comments noted. Transparent shopfronts refer to ensuring that ground floor premises are not shielded by opaque security shutters or vinyl screening to windows. i.e.) the shopfront should enable window shopping, general browsing and natural surveillance, contributing to an active	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	frontage and lively public realm.	
Re para 12.144; Please add an equivalent statement regarding fully opening windows to balance paragraph 12.143; regarding fully opening shopfronts. Especially if stall risers are low, fully opened windows can be just as damaging in design terms. And in all cases they can have the same negative impact on local amenity, for example in terms of noise and disturbance.	Comments noted. We propose to update the supporting text to this policy to reflect the comments made.	Change proposed

Chapter 13 - Protecting Amenity

In total **52** representations were made on the Protecting Amenity Chapter. Of these, **9** representations were received via commonplace and **43** representations were received via email.

Responses were received from the following consultees:

- Somers Town Neighbourhood Forum
- NHS Healthy Urban Development Unit
- Primrose Hill Conservation Area Advisory Committee
- SEGRO
- Transport for London
- Dartmouth Park Neighbourhood Forum
- Highgate Conservation Area Advisory Committee
- Thames Water
- Cover Garden Community Association
- Highgate Society
- Camden Town Unlimited
- Woodland Trust
- Environment Agency
- Hilson Moran
- Theatres Trust
- British Museum
- Members of the public

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The plan needs to cover the issue of litter and waste management to ensure that new development don't further exacerbate this issue.	Draft plan policy D1 Achieving Design Excellence requires development to provide appropriate facilities for the storage, separation and collection of waste and recycling. The supporting text to policy A2 highlights the importance of considering the cumulative impacts (including potential littering) of nigh-time economy uses. Policy IE10 Markets includes reference to the need for careful management to avoid harm to surrounding areas through issues such as littering. We also propose to update Policy IE6 Supporting Centres and High Streets to refer to litter bins in the context of the quality of environment in Camden's Centres.	Change proposed.
Concerns relating to land ownership and control.	Comment noted.	No change proposed.

Policy A1 - Protecting Amenity

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There are concerns with conflicting priorities regarding daylight/ sunlight and proposals for tall buildings with impacts from overshadowing.	Policy A1 Protecting Amenity seeks to protect the quality of life of future and existing occupiers and neighbours, and includes reference to consideration of sunlight, daylight and overshadowing.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	Policy D2 on Tall buildings states that we will give particular attention to the degree to which a tall building proposal overshadows neighbouring buildings and spaces.	
There are concerns regarding daylight standards in Holborn, e.g.) GOSH and Museum Street. There is a perception that council regards BRE standards intended for suburbs. There is little faith in the intention of the Council to implement existing or proposed policies.	Comment noted. Policy A1 Protecting Amenity seeks to protect the quality of life of future and existing occupiers and neighbours, and includes reference to consideration of sunlight, daylight and overshadowing. Policies are applied taking account of the specific circumstances of particular sites and proposals.	No change proposed.
Amenity policies should be adhered to. The policy should include a clear list of what is defined as amenity, including supermarkets, community centres, etc. Protection of amenity should mean like for like provision where replacement is proposed. Phasing plans of developments also need to ensure such facilities are consistently available throughout development.	The Plan's approach to the protection and reprovision of social and community facilities is set out in Policy SC2 – Social and Community Infrastructure, rather than the protecting amenity policy (A1). SC2 states that facilities should be retained unless a replacement of a similar nature is provided which meets user needs, or the premises are no longer required or viable.	No change proposed.
There is concerned with lack of reference to waste management, e.g. bin provision. Waste management is key to quality of environment and amenity.	Draft plan policy D1 Achieving Design Excellence expects developers to provide delivery and servicing plans as appropriate which would include	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	details of waste management arrangements for major developments. Draft plan policy D1 requires development to provide appropriate facilities for the storage, separation and collection of waste and recycling. The supporting text to policy A2 highlights the importance of considering the cumulative impacts (including potential littering) of nigh-time economy uses. Policy IE10 Markets includes reference to the need for careful management to avoid harm to surrounding areas through issues such as littering. We also propose to update Policy IE6 Supporting Centres and High Streets to refer to litter bins in the context of the quality of environment in Camden's Centres.	
In Somers Town, the cumulative impacts of development has had a profound impact on residents' health and well-being. Adequate measures for the cumulative impacts of construction should be in place. CMPs are currently inadequate. Developers should take account of cumulative impacts, e.g.) HS2.	Comment noted.	No change proposed.
The policy to protect amenity and health and	Support welcomed. We propose to update the supporting text to make it	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
well being of existing occupiers is supported. Neither policy nor supporting text specify that supplementary guidance should be followed, rather refers to it as a reference document.	clear that CPG guidance is followed.	
We support effective policies to protect amenity.	Support welcomed.	No change proposed.
We strongly support recognition of the problems of light pollution both for residential accommodation and for green ecology.	Support welcomed.	No change proposed.
The statement in 13.24 'have regard to Policy A4' is too weak. Noise pollution can be seriously harmful to neighbours. Applicants should not cause harm to neighbours through noise and vibration.	Paragraph 13.24 provides a cross reference to policy A4. It does not affect the application or strength of Policy A4, which seeks to ensure that noise and vibration is controlled and managed to avoid significant adverse impacts on health and quality of life. It is not considered necessary to amend the wording of para 13.24.	No change proposed.
General support, however, objection to wording at para 13.15 re: LGV deliveries.	Objection noted re: LGV deliveries. We propose to remove reference to this in the supporting text. The servicing of developments is largely dealt with by Policy T6 sustainable movement of goods, services and materials.	Change proposed
An objection to the 'blanket' presumption that LGV will always be harmful to residential amenity, para 13.15. The	Objection noted re: LGV deliveries. We propose to remove reference to this in the supporting text. The servicing of developments is largely dealt with by	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Council has not provided any evidence to substantiate this assumption. It is suggested that servicing can be arranged to ensure that residential amenity is protected. Without the appropriate evidence, it is not justified to introduce a blanket presumption against such development. It is suggested to delete a sentence within para 13.15.	Policy T6 sustainable movement of goods, services and materials.	
TfL support for policy (in line with London Plan T4 and T7).	Support for policy is welcomed.	No change proposed.
The three chapters in the DPNF Neighbourhood Plan which seem most relevant to the council's definition are Ch. 3: Design and Character; Ch. 6: Neighbourhood Centres and Employment; and, Ch. 7: Environment and Sustainability.	Comment noted.	No change proposed.
This policy is welcome in its intentions. Of particular concern in our neighbourhood are Policies B.i to iv, especially iv, Transport impacts, but feel this should be expanded to include road routes (critical and otherwise) and congestion as a factor. It is positive that the impacts of the construction phase are included.	Support for the policy is welcomed. Policy A1 Part B iv 'transport impacts' would cover road routes and congestion considerations where relevant. Transport impacts including the highways network, emergency vehicle routes and congestion are discussed further in the supporting text at paras 13.14-13.17.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
There are concerns over changes in use generating potential noise nuisance. Highgate CAAC consider that appropriate conditions will be needed to be added to decision notices to protect amenity.	Comment noted.	No change proposed.
The factors listed in part B of the Policy are supported. However, there are concerns regarding consistency of wording with regards to factors such as odour, within Policy A1 and A4.	Support for Part B welcomed. It is proposed to update the policy to refer to noise and other nuisance generating activities.	Change proposed.
The text in Section 13.33 should be revised as follows: The Council will work with water and sewerage providers to ensure that there is adequate water and wastewater infrastructure serving developments likely to put pressure on existing water infrastructure. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary	We proposed to update the supporting text of the policy to reflect the proposed changes to wording.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.		
Re para 13.22: Please specify a substantial amount for each bond. For example, 5% of the projected final value of the development. Bonds of a few tens of thousands of pounds are ignored by developers as soon as they are running behind schedule.	Information on the level of bonds is set out on the Council's website, not in the Local Plan.	No change proposed.
General support for policy and supporting guidance on Amenity (2021).	Support welcomed.	No change proposed.
General support for policy and supporting guidance on Amenity (2021).	Support welcomed.	No change proposed.
Support for the CAAC representation suggesting that conditions should be applied to decisions to control other nuisance, not just noise.	Comment noted.	No change proposed.
Should energy generation now be added to the list of amenity items considered in assessing planning applications?	Energy generation is covered in the Plan's climate change chapter.	No change proposed.
Camden is regularly totally failing to protect residential residents against builders/ developers Camden should fully adopt the Code of Conduct Practice already in place in Westminster Council	The Local Plan states that the Council will expect developers to sign up to the Considerate Constructors Scheme and Construction Logistics and Community Safety (CLOCS) monitoring, and adhere to the Guide for Contractors Working in Camden. No additional wording is considered necessary.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Where the impact of construction will be considerable should this be assessed at decision level and not only when permission to go ahead has already been given?	As stated in draft policy A1 part B clause v), the Council will consider the cumulative impacts of the construction phase and the need for construction management plans when assessing planning applications. This assessment will be undertaken on a case-by-case basis. Construction management plans are secured via section 106 legal agreement prior to commencement of development. A scheme may receive a recommendation for planning permission subject to a S106 agreement; however, the Council have the opportunity to scrutinise details of CMPs and to reject those which are deemed insufficient as part of the decision making process.	No change proposed.

Policy A2 - Safety and Security

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Concerns with proliferation of crime and drug use in south of the borough (King's Cross).	Comment noted.	No change proposed.
Concerns with crime and antisocial behaviour, e.g.) phone theft.	The draft Plan includes Policy A2 – Safety and Security which must be considered in development proposals. However, crime and ASB in general are outside the scope of the Local Plan.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The policy is broadly supported. However, it is suggested that the Council make reference to 'Secured by Design accreditation measures. Early consultation with Police Liaison Officers should also be encouraged.	We propose to update the supporting text to encourage early engagement with Police Liaison Officers. However, we do not consider it necessary to require applicants to secure Secured by Design accreditation measures as a blanket measure. Nevertheless, Secured by Design principles may be relevant in some circumstances and maybe secured on a case by case basis.	Change proposed
Suggested amended wording A2 vii: "identify and mitigate potential suicide risks associated with the built environment, particularly in relation to tall buildings and structures, and transport infrastructure."	No change to the wording is considered necessary. Mitigation of risks will necessarily involve their identification.	No change proposed.
Perhaps the focus on Camden Town and Central London should be broadened to include DPNF areas?	The policy refers to Central London, Camden Town and other centres as these have particular concentrations of Food, drink and entertainment uses. A specific reference to the Dartmouth Park area is not considered necessary.	No change proposed.
Recommendation to proactively refer to Business Improvement Districts (BIDs) where planning for safety and security fall within BID boundary. Camden Should engage with BIDs	No additional wording is considered necessary here. However we propose to update the text at para 15.33 to include BIDs under the specific list of partners we will work with.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
to benefit from local knowledge.		
Policy A2 vii suggested amended wording: "mitigate potential suicide and accident risks associated with the built environment".	No additional wording is considered necessary. Suicide is specifically referenced in so far as it relates to the built environment, as there are specific measures we would expect applicants to consider and employ with regards to mitigating suicide risk in new development as noted in paras 13.44 – 13.48. Accidental risks in contrast are too broad and numerous to capture in policy, and arguably beyond the scope of what can be covered by a Local Plan. Furthermore, these should be mitigated through good design and also Construction Management Plans.	No change proposed.

Policy A3 - Air Quality

Summary of Comments	Council's Response	Proposed Changes to the draft Local Plan
The aspiration to improve air quality is welcomed. However, the plan should clarify what measurable targets would constitute poor air quality such that it would warrant resisting development.	Support welcomed. The Council has adopted World Health Organisation air quality guidelines, as set out in draft Local Plan para 13.51. As set out in policy A3, the acceptability of a development will depend on both air quality and the mitigation measures proposed. We propose to update the Plan to provide a definition of poor air quality.	Change proposed
Dartmouth Park Neighbourhood Forum state they are a location with poor air quality, particularly on Gordon House Road and surrounding, but this is not identified in the plan. What is the criteria or benchmark?	The map shows areas identified by the London Plan as having acute poor air quality. The definition of what is defined as poor air quality will be updated in the Plan.	Change proposed
The policy could be strengthened re: impact of air pollution on the natural environment and the role of green infrastructure (as per NPPF para 92). Suggested wording (A3 A): "The Council will expect development to contribute to improving air quality in Camden to protect public health and t**he natural environment**: iii. Require all development to use design solutions, i**ncluding maximising the use of green infrastructure and nature-based solutions**,	We have updated the Plan to reflect this comment.	Change proposed

Summary of Comments	Council's Response	Proposed Changes to the draft Local Plan
to reduce exposure to existing poor air quality and address local problems of air pollution".		
General support for policy A3 relating to Air Quality in line with London Plan. It is suggested to link Policy A3 to other policies which refer to 'Agent of Change' principle. See also comments on Inclusive Economy. Agent of Change' principles contained within the London Plan should be used to mitigate risks to residents and other users.	Policy A3 is considered to be consistent with the agent of change approach and London Plan policy D13.	No change proposed.
Suggested addition to wording para 13.69 re: commercial cooking. Please add text to say that the council will expect applicants to use recirculation systems that result in no external pipework or emissions, where possible.	The policy requires applications for commercial cooking to demonstrate how the impact will be mitigated. This may include proposals involving recirculation systems where appropriate, but it isn't considered necessary to explicitly refer to these systems in the policy.	No change proposed.
The respondent agrees with the design led approach to minimising exposure of receptors to air pollution, as per the GLA.	Support welcomed.	No change proposed.
The respondent notes that the new draft policy appears more robust than the previous version.	Comment noted.	No change proposed.

Policy A4 - Noise and Vibration

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Residential amenity should be taken into account when considering music and entertainment (noise generating) developments.	Policy A4 seeks seek to ensure that noise and vibration is controlled and managed to avoid significant adverse impacts on health and quality of life. It states that permission for noise and vibration generating development, including any plant and machinery, will only be granted where it can be operated without causing harm to amenity.	No change proposed.
HUDU suggests identifying areas where further controls on expanding uses is implemented to avoid a worsening of existing and future amenity of residential occupiers.	This is covered by policies A1 and A4 and the Agent of change policy in the London Plan. It is not considered practical or appropriate to identify specific areas as suggested.	No change proposed.
Noise in gardens is mentioned in Appendix 3 Table C but should be referenced in Policy A4 as especially vulnerable to harm from noise and vibration.	Criterion A.i in the policy states that when assessing applications the Council shall have regard to Appendix 3. No change is therefore considered necessary.	No change proposed.
Welcome and support the policy.	Support welcomed.	No change proposed.
The principles of the policy are supported, but ain it would be helpful to include developments that do not require full planning permission	The policies in the Local Plan can only be applied when planning permission is required. It cannot control changes to the operation of existing premises as outlined.	No change proposed.
It should be clarified that the agent of change principle should apply to a range of potential nuisances, i.e.) not just noise.	We propose to update policy A1 to refer to the Agent of Change principle.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Suggested alteration to wording at para 13.85, to include properties 'close by' as per London Plan policy D13, instead of properties 'adjoining' as in the current draft.	We propose to update the wording as requested.	Change proposed
The CGCA welcomes proposals to require maintenance agreements for plant installations secured by conditions. The CGCA also suggests that text is added to require maintenance logs and procedure for interested parties to check logs.	It is not considered to be practical to enforce a requirement for maintenance logs to be made available to interested parties.	No change proposed.
The CGCA suggests that wording should be updated at para 13.94 to explicitly reiterated the 08:00-20:00 time window from the previous plan (para 6.104).	We proposed to update the wording to include the time window as suggested.	Change proposed
Relaxations should be included for plant and machinery noise impact on quieter background noise levels, i.e. lowest background noise level below 40 dB. Limit for commercial buildings receptors should be clarified as well.	A range should be used as per latest guidance, BS 6472 provides guidance on human response to vibration in buildings. Whilst the assessment of the response to vibration in BS 6472 is based on the VDV and weighted acceleration, for construction it is considered more appropriate to provide guidance in terms of the PPV, since this parameter is likely to be more routinely measured based upon the more usual concern over potential building damage. Furthermore, since many of the empirical vibration	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	predictors yield a result in terms of PPV, it is necessary to understand what the consequences might be of any predicted levels in terms of human perception and disturbance.	
The 'Rating Level' for plant noise of 15 dB below background when tonal components are present, could be unnecessarily restrictive. In fact, the 'Rating Level' should already account for tonal elements so this is not appropriate when considering BS 4142.	The Rating Level for plant noise of 15 dB is considered appropriate.	No change proposed.
Vibration levels inside dwellings are given as a range rather than a limit, so it would need to be established which value would apply.	A range should be used as per latest guidance: BS 6472 provides guidance on human response to vibration in buildings. Whilst the assessment of the response to vibration in BS 6472 is based on the VDV and weighted acceleration, for construction it is considered more appropriate to provide guidance in terms of the PPV, since this parameter is likely to be more routinely measured based upon the more usual concern over potential building damage. Furthermore, since many of the empirical vibration predictors yield a result in terms of PPV, it is necessary to understand what the consequences might be of any predicted	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	levels in terms of human perception and disturbance.	
General support for Amenity policies. Support for potential for retro fitting measures re: Policy A4. Support for agent of change principle in relation to established noise generating activities.	Support welcomed	No change proposed.

Chapter 14 - Safe, Healthy and Sustainable Transport

In total **64** representations were made on the Safe, Healthy and Sustainable Transport Chapter. Of these, **9** representations were received via commonplace and **55** representations were received via email.

Responses were received from the following consultees:

- Transport for London
- Canal and Rivers Trust
- Dartmouth Park Neighbourhood Forum
- Camden Town Unlimited
- London Borough Islington
- University College London (UCL)
- Covent Garden Community Association (CGCA)
- Campaign to Protect Rural England
- Regal London
- Woodland Trust
- NHS Healthy Urban Development Unit
- Environment Agency
- Hilson Moran
- Somers Town Neighbourhood Forum
- Primrose Hill Conservation Area Advisory Committee
- Folgate Estates
- Unite Group PLC
- Eton Conservation Area Advisory Committee
- Camden Green Party
- Belsize Parkhill and Elsworthy Conservation Area Advisory Committee
- Kentish Town Neighbourhood Forum

- Highgate Conservation Area Advisory Committee
- SEGRO

General Comments

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Camden has shut down access by vehicles to many side roads which has worsened air quality	Comments noted. The closure of streets is not a planning matter. We have passed the comment on to the relevant Council service.	No change proposed.
The one-way system in Camden is one of the worst in London. Camden High Street is blighted by multi lane traffic, lack of trees and absurd traffic flow. The lack of a coherent traffic strategy is having a negative influence on health and well-being. The huge loops cars and buses have to make due to blocked and one-way roads is anti-business, anti-growth and anti-green.	Comments noted. The operation of the road system is not a matter for the Local Plan. We have shared this comment with the relevant Council service.	No change proposed.
The impact of transport measures in the local plan area likely to be quite limited in meeting the objective of reaching net zero by 2030, the achievement of which is infeasible. Changes to the transport system need to be incremental to retain popular support, which, on the whole, the draft Local Plan seems likely to achieve. .	Comments noted.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Recommend the Council provides further support for the Camden Highline to help deliver sustainable transport objectives. CIL or Sec 106 should be spent towards the delivery of the Camden Highline	The Highline is referred to as an infrastructure priority in policies S1 South Camden and C1 Central Camden. S106 contributions towards appropriate infrastructure will be secured on a case-by-case basis. The Local Plan does not set out spending priorities for CIL.	No change proposed.

Policy T1 - Safe, Healthy and Sustainable Transport

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Recognise Camden's promotion of a sustainable transport network and support the car-free policy.	Support welcome.	No change proposed.
Would welcome support from developments in the vicinity of the canal for improvements to the canal towpath and accesses to it.	We propose to update Policy NE1 Natural Environment to state that the Council will "Work with partners to preserve and enhance the Regent's Canal, including its setting, and improve access to the Regents Canal towpath, whilst balancing the differing demands on the Canal and its towpath". We also propose to update the supporting text of Policy NE1 Natural Environment to state that key considerations here are improving the accessibility of the Canal and also improving biodiversity along the Canal through planting, and the	Change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	provision of green or brown roofs and green walls. We also propose to add that developments that come forward in proximity to the Regents Canal should consult with the Canal and Rivers Trust at an early stage in the planning application process.	
Strongly supportive of policies in relation to inclusive environments, and aspirations for improvements to accessibility for all. Would like further clarification on the provision of disabled car parking spaces, suggesting reference should be made to meeting the London Plan guidance instead of operational need. Consideration should be given to the provision of accessible EV charging points. Suggest reference improving and providing wayfinding, signage, and quietways for those with accessibility requirements.	Support welcome. The approach to parking for disabled people is consistent with the Plan's approach to car-free development. As set out in para 14.30, parking for disabled people should be provided where it can be demonstrated as necessary, considering existing availability of on-street parking for Blue Badge holders. The Council has a strategy for the delivery of EV charging points and the Local Plan supports the delivery of this. No additional wording is considered necessary. It is proposed to include a new policy in the Plan on Access for all, which expects streets, public spaces, and routes between buildings to be designed to be fully accessible, with clear, easy to read signage.	No change proposed.
Are there plans to expand electric charging facilities?	Policy T1 (Safe, Healthy and Sustainable Transport) promotes an	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	increase in EV charging points to support the Council's Transport Strategy and Electric Vehicle Charge Point Action Plan which sets out the Council's plans to develop a comprehensive network of electric vehicle charging points.	
The Council needs to ensure that planning decisions do not increase pressure on the use of the kerbside. Where a development will require deliveries from the kerbside it needs to be able to show that it can be accommodated within the current demand for the kerbside area close to the site.	Policy T1 ix requires development to contribute to kerb-side space that prioritises the sustainable movement of goods, services, materials, and people. Policy A1 expects Delivery and Servicing Management Plans from relevant developments. Proposals should provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts, as set out in para 13.1	No change proposed.
Additional text	At 14.2 add 'will enable us to meet the objectives of this policy' at the end of the highlighted sentence.	Change proposed
Camden needs to consider "everyone" living/working in Camden when making changes to the roads. Inclusivity is important. regardless of any negative comments you may receive in relation to such schemes you will introduce them anyway.	The Local Plan recognises the need for development to be inclusive to respond to the needs of the different communities in Camden and this is reflected in the policy approach set out in the Plan. We have considered all comments made during the consultation on the	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	draft Plan and proposed amendments where considered appropriate. Consultation on individual transport proposals is not a matter for the local plan. We have shared this comment with the relevant Council service.	
The Local Plan should propose re-allocation of land-use for at least 25% of the estimated 350 acres of kerbside space in Camden, as public space to meet environmental and social goals and e.g., from bus and cycle lanes, cycle storage, rain gardens, tree planting on build-outs, EV charging, parklets.	Local Plan policy T1 promotes highways greening measures, including tree planting, provision of pocket parks and green space, the introduction of rain gardens. The plan also promoted cycle lanes and EV charging. The use of a particular kerbside space is not a matter for the local plan. We have shared this comment with the relevant Council service.	No change proposed.
LTNs have substantially increased traffic on the main roads. It also means that people who live along those main roads are exposed to increased pollution. Those are mostly people of lower means so this discriminates against poorer people in favour of more middle class roads now protected by LTNs. Camden Council's policy appears to assume everybody is young, male, fit and single.	The introduction of low traffic neighbourhoods in not a matter for the Local Plan. We have shared this comment with the relevant Council service.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Fully support the overarching principles established by Policy T1. Suggest additional wording to consider strategic infrastructure projects which potentially have long time frames which can threaten to prevent development from coming forward.	Support welcome. The proposed wording would weaken protection for strategic infrastructure projects and is therefore not considered appropriate.	No change proposed.
Support incorporating tree planting, rain gardens and other forms of urban greening into transport and traffic schemes. We encourage the integration of tree planting into new walking and cycling routes.	Support welcome.	No change proposed.
We broadly support the approach to transport set out in this policy which is in close alignment with the London Plan. Recommend reference is made to supporting the Mayor's target for 80% of journeys to be made by active, efficient and sustainable modes through including the borough's LIP target of 93% of journeys to be made by sustainable modes by 2041, and also recommend including support for the Mayor's Vision Zero target.	Support welcome. We propose to update the supporting text to reflect this comment.	Change proposed
Welcome the aims of Chapter 14 to promote car free developments and prioritise more active travel. Also reference to Mayor's Healthy Streets	Support welcome	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Approach which will have a positive impact on health and wellbeing.		
Proposes a timed Central London Congestion Zone, removal of on street parking and replacement with designated parking areas for local residents and businesses, and allocated times for delivery vehicles outside of the timed Congestion Zone. Taxis should be considered part of the solution to making London greener and safe	Comments noted. The suggested measures are not matters that are controlled through the Local Plan. We have shared this comment with the relevant Council service.	No change proposed.
Welcome reference to this policy supporting delivery of the Council's Clean Air Action Plan and Climate Action Plan, There is scope for Policy T1 to support the Council's Biodiversity Action Plan, and to encourage transport schemes to deliver benefits for the natural environment, including connectivity for nature, and SuDs to mitigate road run-off. Suggest reference to Policy CC12 Sustainable Drainage for consistency of language.	Support welcome. We propose to update the supporting text of the policy to refer to the Council's Biodiversity Strategy and Sustainable Urban Drainage Systems.	Change proposed
Agree with requirement for transport to promote green space within streets and the links to noise impacts in this policy.	Support welcome	No change proposed.

Policy T2 - Prioritising walking, wheeling, and cycling

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
More cycle parking hoops, increase pedestrianisation, filtering out of private vehicles) via bus gates, further policies to get more women, ethnic people to cycle, and priority head start at traffic lights for cyclists to get ahead of the traffic.	The suggested measures are not matters that are controlled through the Local Plan. We have shared this comment with the relevant Council service.	No change proposed
There should be more cycle storage in existing estates. Potholes cracked pavements and a lack of dropped kerbs all make getting around difficult for those with mobility issues. Maintenance of pavements is poor.	Policy T2 Prioritising walking, wheeling, and cycling requires the provision of a range of cycle parking and storage facilities in new development. The provision of cycle storage on estates is not a matter for the local plan. We have shared this comment with the relevant Council service.	No change proposed.
Welcome measures in policy which are in alignment with the London Plan and the Sustainable Transport, Walking and Cycling LPG. Recommend including maps of planned walk and cycle networks.	Support welcome. We do not consider it to be appropriate to include detailed walking and cycling maps in the Local Plan. These are available to view online on the Council's website.	No change proposed
Welcome the promotion of active travel.	Support welcome.	No change proposed
Part B (vi) of Policy T2 should be revised to be subject to viability, feasibility and operational considerations.	The plan states that that in considering planning obligations, we will consider viability, the range of benefits provided and the extent to which the development contributes towards delivering Plan objectives (para 15.34), so we do not consider the proposed	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	change is necessary or appropriate.	
Object to PBSA schemes providing cycle parking in accordance with the London Plan. Levels of cycle parking for student housing should be considered on a case-by-case basis as supported by the evidence. At most, Camden should require a 25% provision of cycle parking spaces.	The cycle standards in the London Plan have been adopted following consideration at examination in public and form part of the development plan of all London boroughs. The Local Plan must be in general conformity with the London Plan. No change is considered necessary or appropriate.	No change proposed.
Strongly supportive of planning policies in relation to inclusive environments, and aspirations for improvements to accessibility for all. Proposed inclusion of consideration of sensory impairments, and specific reference to safer provision of docking stations in policy T2	Support welcome. We propose to include a new access for all policy in the updated Local Plan that will respond to these issues.	Change proposed
The minimum requirements for cycle parking in PBSA schemes far outweighs the demand for such spaces and leads to largely empty cycle storage rooms which could be better re-allocated.	The cycle standards in the London Plan have been adopted following consideration at examination in public and form part of the development plan of all London boroughs. The Local Plan must be in general conformity with the London Plan. No change is considered necessary.	No change proposed.
To provide improved accessibility to the open space of the Regent's Canal, the Local Plan should include support for	We propose to update Policy NE1 Natural Environment to state that the Council will "Work with partners to preserve	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
towpath improvements and inclusive access, improved access points, and wayfinding improvements.	and enhance the Regent's Canal, including its setting, and improve access to the Regents Canal towpath, whilst balancing the differing demands on the Canal and its towpath". We also propose to update the supporting text of Policy NE1 Natural Environment to state that key considerations here are improving the accessibility of the Canal and also improving biodiversity along the Canal through planting, and the provision of green or brown roofs and green walls. We also propose to add that developments that come forward in proximity to the Regents Canal should consult with the Canal and Rivers Trust at an early stage in the planning application process.	
Policy T2 requires development to contribute to crossings over the canal, but not to the towpath itself. Increased developments in the local vicinity will bring more people to the Canal, and a contribution towards towpath improvements would be reasonable.	We propose to update Policy NE1 Natural Environment to state that the Council will "Work with partners to preserve and enhance the Regent's Canal, including its setting, and improve access to the Regents Canal towpath, whilst balancing the differing demands on the Canal and its towpath". We also propose to update the supporting text of Policy NE1 Natural Environment to state that key considerations here are	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	improving the accessibility of the Canal and also improving biodiversity along the Canal through planting, and the provision of green or brown roofs and green walls. We also propose to add that developments that come forward in proximity to the Regents Canal should consult with the Canal and Rivers Trust at an early stage in the planning application process.	
Policy should say "within conservation areas and with regard to the setting of listed buildings, signage, clutter or decisions leading to harmful impacts from large vehicles should be avoided".	We consider that this would be covered by Policy T2 Prioritising walking, wheeling and cycling, Policy D5 Heritage and Policy D7 Advertisements and Signage. No change to wording is therefore considered necessary.	No change proposed

Policy T3 - Public Transport

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Transport links within and between stations and stops needs improvement, e.g. management of street clutter	Management of streets is not a matter for the Local Plan (although the plan does include policies that seek to prevent adverts and signage creating street clutter in the public realm (Policy D7)). We have shared this comment with the relevant Council service.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Support the Plan's calls for public toilets "where interchanges cater for longer distance journeys" and more public toilets.	Support welcomed	No change proposed
Agree that both Kentish Town and Camden Town stations need step-free access	Support welcomed.	No change proposed.
Recommend that bus stands and drivers facilities are added to the list of infrastructure in Part A	We propose to update the policy to reflect the suggested additional wording.	Change proposed
Support Part B	Support welcomed	No change proposed
Welcome the requirement for developments to facilitate and improve interchange opportunities. Part C or supporting text could additionally refer to TfL's Interchange Best Practice Guidelines.	We propose to update the supporting text of this policy to refer to passenger transport interchange facilities needing to be designed and delivered in accordance with Transport for London's Interchange Best Practice Guidelines.	Change proposed
Support accessible, sustainable, public transport.	Support welcomed	No change proposed

Policy T4 - Shared transport infrastructure and services

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Cyclists should be made to pay for use of roads.	Comments noted.	No change proposed.
Welcome the commitment to working with car club operators to expand and improve the network of car club bays.	Support welcomed.	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Broadly welcome the approach to shared transport infrastructure. Car clubs are best targeted at areas that are less well-connected and have higher rates of car ownership where they can substitute for private vehicles. Car club spaces count towards parking provision in new developments and would therefore not be appropriate generally	Support welcomed. Comments noted.	No change proposed.
There is no acknowledgement of the potential conflict between safer pedestrian and cycle routes.	Policy T2 expects developments to be easy and safe to move through for pedestrians, and provide safe cycle routes.	No change proposed.
Suggest policy supporting for the provision eco-moorings along the Regent's Canal.	The Plan supports the approach in the Camden Transport Strategy, which currently does not specifically refer to eco-moorings. We will pass these comments to the transport team for consideration.	No change proposed
More integrated/multi-use bays for different scooter and bike hire companies would be beneficial.	Policy T4 supports the development of shared transport infrastructure, which would include, where feasible, Santander cycle hire docking stations, e-bike and e-scooter hire bays, cargo bikes for hire, and car club bays.	No change proposed.

Policy T5 - Parking and car-free development

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Scrap car free area parking permit restrictions	Limiting the opportunities for parking within the borough can reduce car ownership and use and therefore lead to reductions in air pollution and congestion and improve the attractiveness of an area for walking, wheeling and cycling. Car-free development will also mean that the borough's limited land can be used more efficiently, which will help to free up space to allow additional housing, employment uses, community facilities, play areas, amenity spaces and cycle parking.	No change proposed.
Private car use for disabled and elderly people should not become out of reach. Waste collection for electronic and large items is not presently good enough.	Comments noted. Waste collection services are not a matter for the Local Plan. We have shared this comment with the relevant Council service.	No change proposed.
Wish to see the new Local Plan backed up by Article 4s to cover front gardens walls and retention of front gardens for planting with crossovers not being granted consent.	The introduction of Article 4 Directions is not a matter for the Local Plan.	No change proposed
If a front garden is large enough for a good level of planting as well as off street parking then a crossover might be acceptable subject to a double EV charging point being provided; and	We consider that this would weaken the policy which seeks to resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
impact on street parking being assessed.		
Amend Part vi. The car free requirement of this Local Plan policy should be applied to all residential and commercial redevelopments except where existing residents with entitlements to parking permits are rehoused as part of an estate redevelopment.	We consider that the Plan clearly sets out the Council's position in relation to this. The suggested amendment is not considered necessary.	No change proposed
Strongly support the redevelopment of existing car parks for alternative uses. This should be expanded to include redevelopment of vehicle storage areas and the repurposing of individual car parking spaces.	We propose to amend Criteria v to refer to existing areas of car parking, rather than car parks.	Change proposed
Car club spaces may not be appropriate for car free developments in well-connected locations and could encourage car use, contrary to the overall aims of the policy. Car club spaces should not be permitted in areas which the London Plan requires to be car free, as only blue badge car parking is permitted such developments.	We propose to update the policy to remove reference to car club spaces.	Change proposed.
Strongly support the policy to limit the availability of parking and require all new	We propose to update the policy to remove reference to car club spaces.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
developments in the borough to be car-free. It is important for any car club provision to be consistent with this.		
Strongly support the Council's commitment to limit the availability of parking, redevelop existing car parks for alternative uses and require all new developments in the borough to be car-free. The Plan must also recognise the need and allocate space for sustainable / active transport including delivery hubs.	Policy T6 Sustainable movement of goods, services and materials supports the provision of delivery hubs in Camden.	No change proposed
New developments should provide adequate parking for emergency vehicles and for visiting health and care providers. Where there are car free or restricted parking provision, dedicated parking for emergency and visiting health care workers should be incorporated within the scheme's design.	This is covered by criterion A ii b which refers to essential operational and servicing needs. We propose to update the supporting text to clarify this.	Change proposed
Welcome policy statements on boundary treatments and gardens	Support welcomed.	No change proposed
Wish to see Camden undertake a trial of EV charging with a cable slot which runs in a groove cut in the pavement.	This is not a matter for the Local Plan. We have shared this comment with the relevant Council service.	No change proposed

Policy T6 - Sustainable movement of goods, services, and materials

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
The policy should be amended to require proposals to "accommodate goods vehicles on site where feasible". Paragraph 14.45 of the supporting text to the policy explains that servicing and deliveries should take place within the curtilage of the development where possible, but it does not preclude off-site servicing outright. Consequently, we consider that the policy should align with the supporting text, in order to ensure it is justified	We propose to update criteria Bii to include the words 'where feasible' and that the supporting text is also updated.	Change proposed
Support an approach that encourages movement by bicycle, canal and rail where possible, including provision for cargo bikes.	Support welcome.	No change proposed
In A part v, the priority order should be foot, cargo bike or zero emission vehicles because even zero emission vehicles take up space within the development and contribute to congestion.	The order in Part v does not indicate priority.	No change proposed
Welcome the requirement for cargo cycle parking in major developments, although this should be in addition to wide-spaced Sheffield stands for non-standard cycles. Also welcome the requirement	Support welcome We propose to update the supporting text to clarify that provision for cargo bikes will be in addition to provision for other forms of cycle parking.	Change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
for contributions towards new and improved cycle infrastructure for logistics developments		
Recommend the consistent use of the terms Construction Logistics Plans and Delivery and Servicing Plans in accordance with the London Plan and TfL guidance.	Construction Logistics Plans form part of a Construction Management Plan. The Local Plan refers to both Construction Management Plans and Delivery and Servicing Plans. These are terms that have been in use in Camden for a number of years and which everyone is familiar with. Given this we do not consider it necessary to change how we refer to these documents.	No change proposed
Pleased to see the support for using waterways for transport. The Local Plan could also include reference to the Transport for London (TfL) webpage that encourages movement of goods by water, and identifies appropriate.	Support welcome. The additional detail proposed is not considered necessary.	No change proposed.
The use of canals requires a diesel engine vessel whilst movement by road can be done use an electric truck. Delivery by road may therefore be more sustainable. Whilst encouraging more sustainable modes is positive, the Policy needs to be consistent about what it means by sustainable.	Comment noted. While movement by road can be done by electric truck, in most cases it is not, and movement by canal will generate fewer emissions than using standard heavy goods vehicles. No change to wording is considered necessary.	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Policy T6 should also require larger developments, especially when they have good road connections, to look at incorporating space for micro mobility hubs, and urban logistics hubs, into their proposals	We propose to update criteria A ix to include reference to micromobility hubs.	Change proposed
The example of cargo bikes should be omitted from paragraph 14.36	The reference to cargo bikes is considered reasonable.	No change proposed
Reword paragraph as it implies encouraging freight trips outside peak hours will minimise the movement of goods by road and this is not the case as the goods will still be moved by road	We propose to update the wording of the supporting text to still keep the reference to encouraging freight trips outside of peak hours but to remove reference to the text that says this is to minimise movement of goods by road.	Change proposed
Agree with policy	Support welcome	No change proposed

Chapter 15 - Delivery and Monitoring

In total **21** representations were made on the Delivery and Monitoring Chapter. Of these, **1** representation was received via commonplace and **20** representations were received via email.

Responses were received from the following consultees:

- Somers Town Neighbourhood Forum
- NHS Healthy Urban Development Unit (HUDU)
- NHS Property Services
- University of London
- LS Finchley Road Ltd
- Camden Town United
- Lendlease and Euston owners
- Highgate Conservation Area Advisory Committee
- Birkbeck (University of London)
- Transport for London
- Members of the public

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Setting appropriate standards and conditions of development are important, however there is a vital need for development to be appropriately monitored and enforced. The Council should be properly staffed to ensure this.	Comments noted.	No change proposed.
Concerned that approved schemes are being watered down by amendments removing desirable or inserting undesirable features to developments. Suggestion for any modifications to approved schemes whereby the development would become less 'green' to be treated as a major material amendment.	Applications for amendments are either treated as 'non-material' where the scope of the proposed change is negligible or insignificant; or as 'minor material' whereby there is full public consultation on the proposed alteration. For the avoidance of doubt, there is no application type: 'major material' amendment (although a Major development [>10 units >1000sqm] could be varied as above). Applications shall be considered on a case-by-case basis, however in general terms, proposals to vary developments which would lead to less sustainable development would not be considered favourably by the Council's planning committee.	No change proposed.
Suggestion for additional bullet points at para 15.20 to include 'health infrastructure' as matters that are likely to be addressed through planning obligations.	As set out in Local Plan para 15.21, the list in paragraph 15.20 is not exhaustive. It includes a bullet point referring to "other obligations necessary to making a	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	development acceptable", which would cover, for example, the provision of community facilities or health facilities. A specific reference to health contributions is therefore not considered necessary.	
Where amendments are proposed to extant permissions, it is suggested that developments should be subject to review of any existing agreements and viability assessments; to ensure that should healthcare provision be required over and above any secured via the original permission (or not), the Council should consider any new impacts and any new need for mitigation/ contributions.	Where amendments are proposed to extant permissions, the Council will request additional information as deemed necessary and proportionate, depending on the nature of the amendments. The council shall apply any conditions and obligations in order to achieve sustainable development. This may include review of existing agreements and viability assessments as suggested. This is not however a matter for the Local Plan.	No change proposed.
Healthcare infrastructure is very resource intensive. The NHS budget faces significant constraints. Population growth from new housing development adds further pressure to the system.	Comments noted.	No change proposed.
New developments should contribute to healthcare provision as being integral to sustainable development, i.e.) good health outcomes support social and economic wellbeing.	Comments noted. The Council seeks to secure space for health facilities in large developments where appropriate (e.g. the O2 development in West Hampstead). CIL applies to all proposals which add 100m^2 of new floorspace or an extra dwelling and these contributions can help fund community	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	infrastructure, including health facilities.	
Residential developments significantly impact the need for primary healthcare provision. Health infrastructure should be at the forefront of considerations for housing and infrastructure delivery. Continued delivery of healthcare is crucially important. The health estate must be supported to develop, modernise or be protected in line with NHS strategies. Planning policies should enable healthcare infrastructure delivery and should be prepared in consultation with the NHS.	Comments noted. New local plan policy SC1 part B vi requires development to support the provision of new or improved health facilities in line with NHS requirements.	No change proposed.
Healthcare infrastructure is crucial to sustainable development. The Council should engage with the NHS and integrated care board (ICB) as part of preparing the Infrastructure Delivery Plan (IDP). A sound IDP must be sufficiently detailed and clear to support growth. It should ensure funds from planning obligations and CIL are directed towards required infrastructure.	Draft policy SC1 (Improving Health and Wellbeing) part B vi specifically requires development to support the provision of new or improved health facilities in line with NHS requirements. We also propose to update the supporting text of Policy SC1 Improving health and wellbeing to state that "…we will also expect applicants to liaise with NHS partners early on in the design process to identify what mitigation is required in particular circumstances." Furthermore officers regularly engage with	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	NHS partners and have a good understanding on local infrastructure needs.	
Healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies. Developers would be informed in advance of contributions toward healthcare infrastructure. A separate cost input for health infrastructure in the plan viability assessment would ensure healthcare mitigation is properly considered with regards to necessary planning obligations. This is particularly important where developer viability assessments demonstrate inability to fund infrastructure requirements.	The NPPF states that "Plans should set out the contributions expected in association with particular sites and types of development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure) (Paragraph 34). Such policies should not undermine the delivery of the plan". The Council have undertaken a viability study to assess the policies in the draft Local Plan. This sought to test the ability of development typologies in Camden to support the emerging policies of the draft Local Plan alongside other plan policies while making contributions to infrastructure that will support growth through the adopted CIL. Given this, no further work is considered necessary.	No change proposed
Major regeneration proposals brought forward by the University of London to further the University's masterplan	Camden and Mayoral CIL charges apply to all proposals which add 100m2 of new floor space or an extra dwelling,	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
should only fund site-specific planning obligations through s106 to meet the University's infrastructure requirements and should not be subject to a further CIL charge.	regardless of the applicant. Development must also to mitigate or compensate for their potential effects and this will be secured through s106 agreements.	
Acknowledgement that the plan needs to be sensitive and flexible which is welcomed.	Support welcomed.	No change proposed.
At para 15.33 key landowners should be included as partners with whom the Council will work in delivering the objectives of the plan.	We propose to update the list of interested parties and stakeholders at para 15.33 to also refer to landowners.	Change proposed required.
A recommendation for the Council to proactively work with well-resourced BIDs to deliver and monitor the Council's vision and objectives where districts are impacted by planning (and licensing)	We propose to update the list of interested parties and stakeholders at para 15.33 to also refer to BIDs.	Change required.
Strong support for flexibility within the local plan in order to respond to changing circumstances, particularly with regards to viability and developments at Euston.	Support welcomed.	No change proposed.
Revisions by non-material amendment should be exceptional. Especially for listed building and properties which make a positive contribution.	Validation is carried out by the case officer who determines the correct application type given the scope of any proposed amendment. An application is 'non-material' where scope of the proposed change is negligible or insignificant; or as 'minor material' where by there is full	No change proposed.

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
	public consultation on the proposed alteration. This is not a policy matter for the Local Plan.	
Major regeneration proposals brought forward by the University of London to further the University's masterplan should only fund site-specific planning obligations through s106 to meet the University's infrastructure requirements and should not be subject to a further CIL charge.	Camden and Mayoral CIL charges apply to all proposals which add 100m2 of new floor space or an extra dwelling, regardless of the applicant.	No change proposed.
Support for commitment to using CIL, planning obligations and legal agreements where appropriate.	Support welcomed.	No change proposed.
Suggestion for additional bullet points at para 15.20 to include 'public transport' and 'active travel improvements' as matters that are likely to be addressed through planning obligations.	We propose to update the list at para 15.20 to include 'public transport and 'active travel improvements'.	Change proposed.
Support for para 15.23 regarding pooled contributions in relation to cumulative impacts of developments.	Support welcomed.	No change proposed.

Comments on Appendix 1 - Infrastructure Table

In total **12** representations were made on Appendix 1. Of these, **0** representations were received via commonplace and **12** representations were received via email.

Responses were received from the following consultees:

- Metropolitan Police
- Royal Free London NHS Foundation Trust
- Sport England
- Transport for London

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
Encourage the Council to include improvements to London Underground stations, particularly the proposed link between Euston and Euston Square stations, as well as improvements to Euston bus station, in the Infrastructure Schedule	We propose to consider this suggestion as part of the Infrastructure Delivery Plan that will sit alongside the Local Plan and replace and update the infrastructure table contained in Appendix 1 of the draft Local Plan.	No change proposed, will address through Infrastructure Delivery Plan
Welcome the continued support for Crossrail 2. The text should refer to 'Crossrail 2'. The opening date for Crossrail 2 is now expected to be beyond the end of the plan period.	We propose to update the information relating to Crossrail 2 in the Infrastructure Delivery Plan. This will sit alongside the Local Plan and replace and update the infrastructure table contained in Appendix 1 of the draft Local Plan.	No change proposed, will address through Infrastructure Delivery Plan
For consistency, this should refer to the 'Piccadilly line upgrade'.	We propose to amend the Infrastructure Delivery Plan to reflect this suggestion	No change proposed, will address through Infrastructure Delivery Plan
Support using developer contributions to improve local bus services	Support welcomed	No change proposed
Encourage that the delivery period for the Camden Town station capacity upgrade to be amended to 'Plan period' in line with other schemes which are not currently committed but otherwise deliverable.	We propose to amend the Infrastructure Delivery Plan to reflect this suggestion	No change proposed, will address through Infrastructure Delivery Plan
Due to funding constraints, Holborn station will not be delivered by 2026.	Noted. We propose to amend the Infrastructure Delivery Plan to reflect this suggestion	No change proposed, will address through Infrastructure Delivery Plan
Welcome support for further step-free access at stations in Camden.	Support welcomed	No change proposed
Welcome the Council's commitment to extending	Support welcomed.	No change proposed, will address through

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
bus priority measures across the borough. Encourage the inclusion of measures such as bus gates, which can be implemented where bus lanes are not feasible. Suggest reviewing and extending hours of bus lane operation which can ensure the efficient operation of the bus network throughout the day. This can also benefit cyclists in locations without dedicated cycle infrastructure.	We propose to amend the Infrastructure Delivery Plan to reflect these matters (although details on specific schemes including the timing of bus lane operation is beyond what the Local Plan/IDP is able to cover).	Infrastructure Delivery Plan
Suggest amending references to the Royal Free Masterplan/ Estate Strategy to better align with the Trust's objectives	We intend that the infrastructure schedule in the draft Local Plan will be taken forward as part of an Infrastructure Delivery Plan, which will sit alongside the Local Plan. It will identify key infrastructure requirements to support growth in Camden such as new/extended health facilities.	No change proposed, will address through Infrastructure Delivery Plan
The Infrastructure Schedule in Appendix 1 makes no reference to emergency services or policing. These are legitimate infrastructure requirements that should be accounted for through section 106 contributions, as demonstrated through appeal decisions. This funding would be able to address a wide range of policing requirements, including improvement to buildings,	We do not propose extending the use of contributions for policing beyond schemes referable to the Mayor of London as separate funding arrangements already exist to meet policing costs in the capital. We will however set out the arrangements applicable to referable schemes as part of the Council's Infrastructure	No change proposed

Summary of Comment	Council's Response	Proposed Changes to the draft Local Plan
equipment such as surveillance infrastructure and CCTV, staff set up costs, vehicles, mobile IT and the Police National Database Request that the Local Plan makes clear, including within the Infrastructure Schedule, that the Police requires section 106 funding from residential developments where they are referrable to the Mayor for London.	Delivery Plan which will incorporate an updated infrastructure table/currently Appendix 1 in the draft Local Plan.	
The Council should update the evidence base for open space, sport and recreation facilities The Council should seek to lead on the delivery of new and improved facilities.	We intend to set out the main infrastructure needs and opportunities for sports as part of the Infrastructure Delivery Plan, which will sit alongside the Local Plan. This will set out the relevant bodies responsible for planning and delivery.	No change proposed, will address through Infrastructure Delivery Plan
The Local Plan has no policy to achieve or support shared use/ community use agreements of school sports facilities, as mentioned in Appendix 1.	We consider that the Local Plan's community policies include adequate referencing to shared use of school sports facilities and potential use of developer contributions.	No change proposed.

Comments on the Sustainability Appraisal and Habitats Regulation Assessment

In total **2** representations were made on the Sustainability Appraisal and Habitats Regulation Assessment by Natural England. Both representations were received via email.

Summary of Comment	Council's Response	Proposed Changes to the SA
Natural England has no comments to make on the Habitat Regulations Screening Assessment	Comment noted.	No change proposed.

2024 Consultation. Lack of comment should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies may wish to comment to assist the LPA take account of environmental risks. Should proposals be amended which significantly affects impacts on the environment, Natural England should be consulted again in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006.		
Natural England have no comments to make on the Habitats Regulations Assessment for your Local Plan.	Comments noted.	No change proposed.

Post Regulation 18 Consultation and Engagement

Since consultation took place on the Regulation 18 draft new Local Plan further engagement has been taken place with key stakeholders, including:

- Neighbouring boroughs under the duty to co-operate;
- The GLA; and
- Infrastructure providers to inform the Infrastructure Delivery Plan.

The outcomes of this engagement are reflected in the Duty to Co-operate Statement and in the Infrastructure Delivery Plan.

The Council also published the Gypsy and Traveller Site Identification Study on its website for a period of six weeks from the 17 December 2024 to the 29 January 2025 and invited comments to be submitted.

As part of this engagement officers also met with the London Organisation for Gypsies and Travellers.

In total 17 comments were received. Of these:

- 10 were objecting to, and 1 was supporting Frideswide Place.
- 3 were generally supporting the principle of providing Gypsy and Traveller accommodation in Camden.
- 2 comments were received from London Gypsies and Travellers, one in their own capacity and one on behalf of the Gypsy and Traveller community in Camden in respect of all sites.
- 1 comment was received from Historic England.