

Responder 589

Date: Fri, 27 Jun 2025 14:46:49 +0000
From: Martin Smith
To: PlanningPolicy
Subject: Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

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Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Martin"/>	<input type="text"/>
Last Name	<input type="text" value="Smith"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
Organisation	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation: Burke Hunter Adams LLP

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.
 Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraphs	C3, C4, D, E3, 12.131, 12.141, 12.142, 12.143, 12.144, 12.145	Policy	D6 Basements	Policies Map	
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4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="checkbox"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="checkbox"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
 If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

I am writing to state my support for the representation submitted by the Association of Specialist Underpinning Contractors (ASUC) - <i>ASUC Representation on Camden Local Plan Proposed Submission Draft - 27 June 2025</i>

I agree with the objections made and proposed modifications given in the ASUC representation regarding Policy D6 Basements

I would like to add that our company employs 14 people who work in the sector with annual turnover of £1,400,000.

The restrictions proposed in Policy D6 Basements would have a significant negative impact on my business. It would likely lead to people losing their jobs.

I ask that the ASUC representation is given full weight, bearing in mind the negative impact on employment for my business and other businesses, and therefore on the broader economy.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

I support the modifications to Policy D6 Basements proposed in the ASUC Representation.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following?
Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	27th June 2025
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Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

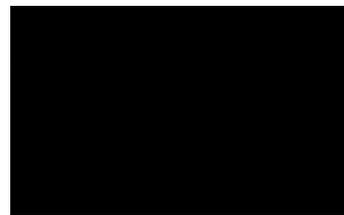
Responder 590

Date: Fri, 27 Jun 2025 14:48:15 +0000

From: Ben Church

To: PlanningPolicy

Subject: Camden Local Plan - Pearl and Coutts Representations



London Borough of Camden
Planning Policy
By email: planningpolicy@camden.gov.uk

27th June 2025

For the attention of the Planning Policy Team

Dear London Borough of Camden,

Re: Camden Local Plan Proposed Submission Draft (Regulation 19) Version (June 2025) on behalf of Pearl & Coutts

Pearl & Coutts (P&C) is a commercial property landlord who have been operating in London for over 50 years. P&C invest in properties across London and the South East as well as the rest of the UK. The P&C holdings within the London Borough of Camden comprise a number of properties in the Hatton Garden area (St Cross Street, Farringdon Street, Greville Street, Leather Lane and Hatton Garden itself) in the southeast corner of the Borough, on the boundary of with the LB Islington and the City of London. In total P&C own approximately 160,000 sq ft of real estate in the Hatton Garden area.

This representation provides feedback on the Regulation 19 version of the Camden Local Plan Proposed Submission Draft ('draft CLP') which is currently out for public consultation with a particular focus on Policy S3 Hatton Garden Jewellery Industry Area (HGJIA).

The Hatton Garden area is not characterised by a single building style or typology but is largely comprised of a small light industrial workshop units and a range of office buildings. These vary in height from four to eight stories and vary greatly in age and include former Georgian townhouses, 1930s blocks, 1970s offices as well as more contemporary offices.

We welcome the opportunity to work with the LB Camden to formulate a new Local Plan for the Borough and prepare a set of planning policies which will support business owners, workers, residents and other key stakeholders alike and which seek to enhance the Hatton Garden area.

Relevant Planning Designations for Hatton Garden

The Local Plan Policies Map identifies the following designations in relation to the Hatton Garden area:

- Hatton Garden Conservation Area
- South Camden
- Hatton Garden Jewellery Industry Area

Policy context and other relevant background

P&C's main landholdings are within the Hatton Garden Jewellery Industry Area (HGJIA), in the southeast of the Borough. The properties are let to a range of occupiers including those within the jewellery trade, traditional office occupiers and other light industrial uses. P&C have on average owned these properties for 17 years and are one of the main landowners in the area.

In the draft CLP, Hatton Garden is identified in Figure 05 as being within the Central Activity Zone, a designated Neighbourhood Centre and as a 'Specialist Area'.

'Specialist Areas' are described in Policy IE6 as areas that are "*distinguished by their clusters of independent and niche retailing, or for the range of food and drink uses, and some may be a visitor attraction in their own right*".



Hatton Garden was first designated as Specialist Area for the jewellery trade in the Core Strategy (adopted 2012) where, in paragraph 8.19 the need to invest in the area to create a stronger identity was noted as follows:

Hatton Garden has been an established centre for the jewellery industry since the 19th Century and today the area is home to nearly 500 businesses and over 50 shops related to the industry. The 2009 Study Supporting Hatton Garden; Priorities for Investment examined the progress in strengthening the jewellery sector in the area. The study found that Hatton Garden received increased investment between 2005 and 2009 but that further investment was still needed to give the area a stronger identity and increase the number of visitors to the area. In order to promote Hatton Garden as a location for jewellery-related uses, the Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses, e.g. the planned jewellery visitor centre. The Council's approach to the conversion of premises in Hatton Garden is set out in Camden Development Policies (DP13 - Employment sites and premises).

Adopted Policy Position

The adopted Hatton Garden jewellery policy (E2) is included below for reference as Figure 1.

A key part of this policy is the requirement to provide 50% of any additional floorspace (above a 200sqm GIA threshold) as affordable floorspace for the jewellery sector.

Hatton Garden

The Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses in Hatton Garden. We will also resist development of business premises and sites for a non-business use.

Where the applicant can demonstrate criterion a. and b. above we will expect the proposals to provide a mix of uses that include premises suitable for use as jewellery workshops.

We will consider redevelopment of premises or sites that are suitable for continued jewellery workshops provided that:

- j. the level of jewellery workshop space is increased or at least maintained;
- k. the redevelopment retains existing businesses on the site as far as possible; and
- l. the relocation of businesses will not cause harm to CAZ functions or Camden's local economy.

Where proposals in Hatton Garden would increase total gross internal floorspace by more than 200sqm, we will seek 50% of the additional floorspace as affordable premises suitable for the jewellery sector.

Figure 1: Adopted Local Plan Policy E2

Recent development in the Hatton Garden Area

As part of our research for this representation a FOI request was submitted to LB Camden which sought information regarding the number and quantum of affordable jewellery workspace units that had been delivered in Hatton Garden since the inception of Policy E2 in the 2017 Camden Local Plan.

The response to the FOI is detailed in the table below:

Application Ref	Address	Type of application	Quantum of jewellery Floorspace (sq/m)	Policy Position at the time of decision	Comparison with 50% policy threshold
2010/0646/P	Hatton Square Business Centre, Baldwins Gardens, ECIN 7RJ	Extension	1,183	Pre 2017 (pre adoption of local plan policy E2)	N/A
2014/2782/P	120 Holborn & 12A Leather Lane, ECIN 2TD	COU from office to light industrial	379	Pre 2017 (pre adoption of local plan policy E2)	N/A
2014/5873/P	18-26 Hatton Wall, ECIN 8JH	Re-provided 138sqm small jewellery studios & 25sqm Jewellery retail - exclusive use	163	Pre 2017 (pre adoption of local plan policy E2)	N/A
2015/1925/P	84 Hatton Garden, ECIN 8JR	Provide additional B1c workshop space	60	Pre 2017 (pre adoption of local plan policy E2)	N/A

2016/2181/P	Minerva House, 26-27 Hatton Garden, ECIN 8BR	Extension to provide additional floorspace	71	E2	102.5 sq/m less than 50% policy requirement
2016/6759/P	Arundel House, Kirby Street, ECIN 8TE	Minor amendment to 2006 permission	491	Not relevant	N/A
2018/0910/P	20-23 Greville Street, London, ECIN 855	Mansard and infill extension	163	E2	365.5 sq/m less than the 50% policy requirement
2020/5897/P	21 Baldwin's Gardens, ECIN 7UY	Extension to existing building (similar scale to previous scheme, ref: 2014/6880/P)	46	E2	Improvement to 2014 permission which pre-dated policy E2

From the above response it is evident that in the HGJIA there have only been three applications for extensions in the past 15 years (since the Core Strategy policy was adopted) that have triggered the 200sqm threshold set out under the adopted Local Plan policy E2).

These were at Minerva House - 26-27 (ref: 2016/2181/P), 20-23 Greville Street (ref: 2018/0910/P) and 21 Baldwin Gardens (ref: 2020/5897/P) – all included in the FOI response above.

Other properties in the HGJIA have added roof terraces or applied for other minor alterations in the past decade, including the Bindery Building (51-53 Hatton Gardens) but these did not create over 200 sq/m of GIA.

We therefore consider that the currently adopted policy and its proposed replacement with a similarly worded policy is a significant barrier to development in the area and is resulting in a substantial lack of investment in the built environment within Hatton Garden compared to other CAZ locations. The requirement to provide half of any new floorspace at affordable levels (50% below the market rate for the jewellery trade, which itself is already a heavily reduced rate) is financially unviable for developers.

CLP Evidence Base

The inclusive economy policies in the CLP are underpinned by the LB Camden Economic Needs Assessment (December 2023). (ENA). This assesses future employment floorspace demands and the land requirements needed to meet the expected employment growth in the borough throughout the plan period (2023 – 2041).

The jewellery trade is focused around retail units (Class Ea) and workshop space (Class Egiii).

Figure 10-1: Floorspace Requirement (sqm) (2023-2041) - Demand-based Scenario

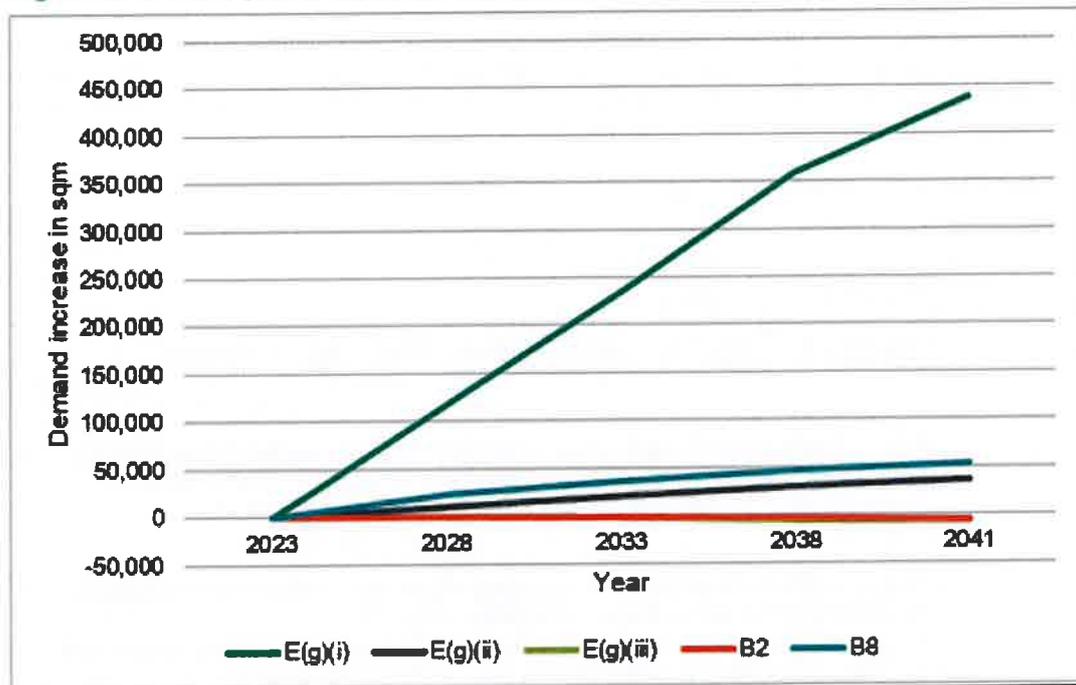


Figure 2: Floorspace Requirement sq/m (2023-2041)

The ENA confirms the demand for office floorspace (Egi) is due to increase dramatically over the plan period and 437,700 sq/m of additional office floorspace will be required. The ENA also forecasts the floorspace requirement for Egiii floorspace to reduce by 7,500 sq/m during the plan period.

The evidence base questions whether the demand for office stock on the HGJIA is reducing, or the quality of office stock is preventing potential tenants from taking the available space (included in the SWOT analysis on page 146 on the ENA).

Supporting Paragraph 9.4.3 of the ENA outlines the trends seen in the jewellery trade between 2015 and 2021, as indicated below:

Between 2015 and 2021, employment in the jewellery industry in LB Camden has experienced a significantly higher growth (4.8% CAGR) than the London average (-0.6% CAGR), and currently stands at 1,985 employees. The manufacture of jewellery experienced a significant decline in 2020, likely due to COVID 19, when employment in the industry experienced a steep decline (600 to 200). This figure has since recovered to pre-pandemic levels. However, the number of employees working on the repair of watches, clocks and jewellery has been reduced by more than half since 2018 (150 to 75). London followed a similar trend for the same period.

This supports the trends outlined in the ENA that, overall, there has been a reduction in the need for jewellery specific floorspace in the Hatton Garden area and that floorspace requirement for jewellery workshops (Class Egiii) is predicted to continue to fall throughout the plan period.

Office floorspace is predicted to grow massively throughout the same period, and Policy S3, as drafted, prevents substantial new office floorspace being created in the HGJIA as the policy threshold to provide half of any new floorspace over 200 sq/m as discounted floorspace for the jewellery trade makes it financially unviable.

Impact of Class E

While it is accepted that the London jewellery trade has been focused in the Hatton Garden area since the 19th century the introduction of Class E allows existing units to change between uses within Class E without planning permission. As evidence in the ENA that underpins the draft CLP the demand for office floorspace is forecast to far outgrow the available floorspace throughout the plan period.

The option to change existing commercial floorspace to offices without requiring planning permission (because of the introduction of Class E) is not going to meet the demand for offices alone (circa 437,000 sq/m of additional floorspace). New office floorspace is required and buildings need to be adapted because of modern requirements (including fire safety, access, sustainability requirements) which leads to new floorspace. Creating this additional floorspace then triggers the requirement to provide 50% of new floorspace at heavily discounted rated for the jewellery trade.

Assessment of Policy S3

As outlined in this response, P&C's primary landholdings are within the HGJIA, in the southeast of the Borough. The Draft CLP supports the Council's efforts to protect existing floorspace within the jewellery trade. The evidence base for the draft CLP acknowledges the changes in working patterns in recent years, due to the Covid-19 pandemic, including the number of employees in the jewellery trade in the HGJIA.

For reference draft CLP policy S3 is included below:

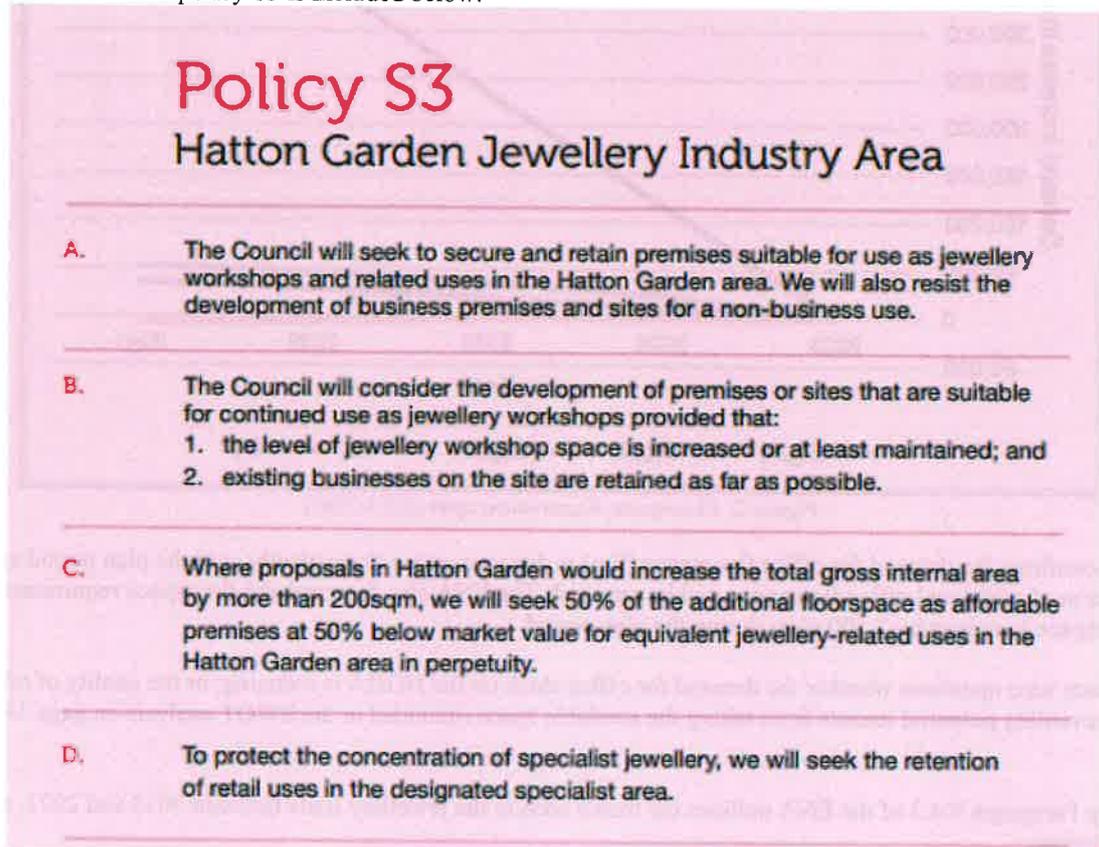


Figure 3: Draft CLP Policy S3

Draft CLP Policy S3 Part A

Part A of CLP draft policy S3 states:

The Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses in the Hatton Garden area. We will also resist the development of business premises and sites for a non-business use.

The Draft CLP retains the protection afforded to properties in the Hatton Garden area that has been enshrined in policy from the Core Strategy (adopted 2012). Other specialist shopping areas which were protected in the Core Strategy have since lost this level of policy protection. Paragraph 7.25 of the Core strategy confirms that in 2012 (when adopted) several areas within the Borough were protected shopping areas:

These include the area around Museum Street for antiquarian books, prints and coins; Hatton Garden for jewellery; Denmark Street for music; Charing Cross Road for books; Tottenham Court Road for furniture and electronics; Drummond Street for ethnic Asian shops and restaurants; and parts of Covent Garden and Camden Town for fashion.

As outlined above the introduction of Class E allows a planning unit to be changed between uses within Class E without requiring planning permission. Part A of policy S3 as drafted fails to recognise this and we would recommend revising to protect only those premises suitable for jewellery in the HGJIA which have explicitly been secured as jewellery floorspace by planning condition. This change to the wording would allow the LPA the necessary ability to control land use in the area while allowing other commercial uses to come forward in the HGJIA as intended through the changes made to the Use Classes Order in 2020.

We would therefore recommend revising the policy to protect only jewellery floorspace that has been previously secured via planning condition.

Draft CLP Policy S3 Part C

Part C of CLP draft policy S3 states:

Where proposals in Hatton Garden would increase the total gross internal area by more than 200sqm, we will seek 50% of the additional floorspace as affordable premises at 50% below market value for equivalent jewellery-related uses in the Hatton Garden area in perpetuity.

The policy requirement to provide half of any new floorspace at discounted market rates has compromised the ability of the HGJIA to grow and redevelop the existing building stock. Secondly, the HGJIA is located in the Hatton Garden conservation area which further restricts the potential to redevelop and alter the existing building stock.

It is noted that this policy was revised during the previous draft of the local plan from “we will seek to negotiate” to “we will seek” a 50% of the additional floorspace as affordable premises. From a review of the decisions included in the FOI request (in the table above) the quantum of floorspace secured in the most recent applications (Minerva House - 26-27 (ref: 2016/2181/P) and 20-23 Greville Street (ref: 2018/0910/P) is far below the 50% policy requirement.

We consider that the policy as drafted is overly restrictive and that the 200 sq/m GIA threshold should be reviewed and increased to better align with the requirements of the London Plan. For reference the requirement to provide affordable business floorspace on site in the London Plan (in policy E2 part D) is on any Development proposals for new B Use Class business floorspace greater than 2,500 sq.m. (gross external area).

The requirement to provide 50% of additional floorspace at a 50% discount to the rental levels for the jewellery trade is also challenging due to the discounted rental levels already offered to the jewellery trade (in many cases a 50% reduction to the general market rent). This, in effect, means that the policy as drafted makes the true discount offered to the jewellery trade to be closer to 75% compared to the market rate. A revision to the draft policy to instead seek “affordable premises for jewellery related uses” would permit landowners to agree a rate with tenants that was appropriate on a scheme-by-scheme basis. Providing half of new floorspace as affordable workspace is also overly onerous and should be reviewed to closer align with the requirement of 10% as included within policy E2 of the London Plan. A requirement to provide 25% of new floorspace as affordable workspace for the jewellery trade is more appropriate in the HGJIA.

The above policy wording fails to account for the nature of the existing buildings in the HGJIA area which, typically, require extensive external and internal works to meet current fire and access standards, due to the necessary additions of stair / lift cores etc, and to generally improve the quality of commercial accommodation. Such minor works can often increase GIA and any related small increase in GIA over and above this can trigger the policy threshold quite quickly.

An increase in the threshold where part C of the policy was triggered (from 200 sq/m GIA to 500 sq/m GIA) should allow more proposals to come forward that can improve the existing building stock, to ensure the buildings meet modern sustainability, fire safety and access standards and are viable for developers to bring these proposals forward.

The Council should therefore increase the threshold where part C of the policy is triggered to 500 sq/m and caveat that this change would be subject to viability testing. The requirement to provide 50% of all new floorspace as affordable for the jewellery trade should also be reduced.

Suggested revision to part C is below:

*Where proposals in Hatton Garden would increase the total gross internal area by more than 500sqm (GIA), we will seek, **subject to viability**, the equivalent of 25% of the additional floorspace as affordable premises for jewellery-related uses in the Hatton Garden area in perpetuity*

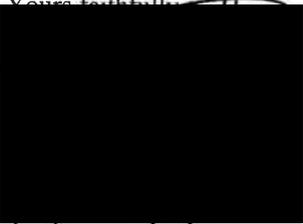
Proposed policy for review / amendment

Taking into account the comments made above, Pearl & Coutts are seeking a number of changes to the policy included in the draft Camden Local Plan, in relation to the Hatton Gardens Jewellery Industry Area. These are summarised below for ease:

- Policy S3 – Part A: Revise the policy to only protect jewellery floorspace that has been secured via condition.
- Policy S3 – Part C: Revise the threshold to be 500 sq/m and subject to viability testing as well as reducing the quantum of new floorspace required to be affordable jewellery floor space from 50% to 25%

Conclusion

Pearl & Coutts welcome the opportunity to continue a constructive dialogue over the evolution of the draft Camden Local Plan and hope our comments, borne out of our practical experience, will make a valuable contribution to the consultation process. Should you have any queries, please don't hesitate to contact the undersigned.

Yours faithfully



Pearl & Coutts	Part Of The Structadene Group
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Responder 591

Date: Fri, 27 Jun 2025 14:48:36 +0000

From: Natalie Davies

To: PlanningPolicy

Subject: Innova representations to the Camden Local Plan June 2025

Dear Sir/Madam

On behalf of our client, The Innova Partnership, please find attached representations to the Draft New Camden Local Plan. I would be grateful if you could confirm receipt of this email.

Kind regards

Natalie Davies



Planning Policy
London Borough of Camden
5 Pancras Square
London
NC1 4AG

By email only: planningpolicy@camden.gov.uk

Ref: U0025118

26th June 2025

Dear Sir/Madam

Camden Local Plan – Proposed Submission Draft 2025

Representations by The Innova Partnership

On behalf of our client The Innova Partnership, we write to respond to the Regulation 19 consultation to the draft new Camden Local Plan. These representations follow those submitted by Network Rail on 13th March 2024. Innova is a partnership between Network Rail and IJM Corporation Berhad which was formed to develop under-utilised Network Rail land across London and the south east.

Allocation 13 Former Thameslink Station, Pentonville Road

Previous representations were sent in respect of IDS17 which sought to include a wider range of permissible uses. We remain of the view that the site is highly sustainable and would benefit from a wider range of use classes including a Class C1 hotel or sui generis student accommodation. The wording should be revised to read:

~~'Employment (including research and knowledge based uses, maker spaces, offices),~~ hotel, student accommodation and permanent self-contained homes'.

Development and Design Principles

It is not clear why the site should include research and knowledge-based uses and small workshop space. We consider that bullet point 2 could be merged with bullet point 1 to read:

1. ensure that a design-led approach is taken to delivering the optimum amount of development for a mix of land uses on the site. Where demolition is proposed, this should be justified in accordance with Policy CC2 (Retention of Existing Buildings).

Other considerations

As set out in Network Rail's previous representations, this is a complex site due to a live rail network immediately beneath the site. For the site to be viably redeveloped, it would be helpful to include reference to a tall building in this inner London location. It is therefore considered that Bullet point 2 should include reference to a tall building having regard to the London View Management Framework SPG. le

The site is situated in a prominent position and is highly accessible. A tall building is acceptable in this location subject to design considerations and the two viewing corridors set out in the London View Management Framework SPG.

We trust that these representations will be considered as part of the Examination in Public. If you have any queries, please contact Natalie Davies at the above office.

Yours faithfully



Natalie Davies



Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London. WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s). Please use a separate page for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2

Title	Mr	
First Name	N	
Last Name	Walton	
Job Title		
Organisation		
Address Line 1*		
Address Line 2		
Post Town*		
Post Code*		
Telephone Number		
E-mail Address		

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – Draft new Local Plan - Camden Council
- Draft Policy Map - Draft new Local Plan - Camden Council

Paragraphs	C3, C4, D, E3, 12.131, 12.141, 12.142, 12.143, 12.144, 12.145	Policy	D6 Basements	Policies Map	
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4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input style="width: 100%; height: 20px;" type="text"/>	No	<input style="width: 100%; height: 20px;" type="text"/>
(2) Sound	Yes	<input style="width: 100%; height: 20px;" type="text"/>	No	<input checked="" style="width: 100%; height: 20px;" type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 100%; height: 20px;" type="text"/>	No	<input style="width: 100%; height: 20px;" type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input style="width: 100%; height: 25px;" type="text" value="Yes"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input style="width: 100%; height: 25px;" type="text" value="Yes"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input style="width: 100%; height: 25px;" type="text" value="Yes"/>
(4) Consistent with national policy	<input style="width: 100%; height: 25px;" type="text" value="Yes"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

I am writing to state my support for the representation submitted by the Association of Specialist Underpinning Contractors (ASUC) - ASUC Representation on Camden Local Plan Proposed Submission Draft - 27 June 2025

I agree with the objections made and the support given in the ASUC representation regarding Policy D6 Basements

I would like to add that our company employs 10 people who all work within the company delivery basement projects for residential projects as well as employing numerous specialist consultants who work in the sector with annual turnover of £1,250,000.

The restrictions proposed in Policy D6 Basements would have a significant negative impact on my business. It would likely lead to people losing their jobs.

I ask that the ASUC representation is given full weight, bearing in mind the negative impact on employment for my business and other businesses, and therefore on the broader economy.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

I support the modifications to Policy D6 Basements proposed in the ASUC Representation.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

No

Yes

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following?
Please mark all that apply.

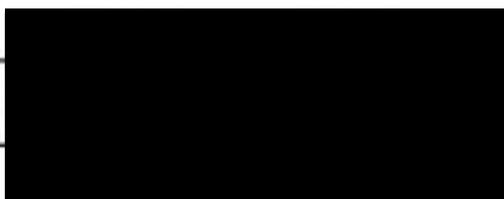
(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	27 th June 2025
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Date: Fri, 27 Jun 2025 14:51:27 +0000
From: SUMMERS, Mhairi (NHS NORTH EAST LONDON ICB - A3A8R)
To: PlanningPolicy
Subject: Consultation on proposed Draft Local Plan Submission Version

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London Healthy Urban Development Unit

Rebecca Burden
Development Plans Manager
London Borough of Camden
5 Pancras Square
WC1H 9JE

24 June 2025

Dear Rebecca,

LB of Camden – Proposed Submission Local Plan Regulation 19 Consultation

Thank you for the opportunity to comment on the Proposed Submission Draft Local Plan and for incorporating a number of the changes suggested in our March 2024 representation. We welcome the overall vision and objectives the Proposed Submission Draft sets out for the Borough.

While this response has been prepared in consultation with NCL ICB and NHS providers, please note that individual providers intend to submit additional responses to address specific concerns.

Where changes are proposed to the wording of policies in order to comply with the NPPF, the London Plan and support the vision set out in the draft plan, these have been highlighted in red italics for ease of reference.

Policy DS1 - Delivering healthy and sustainable development

We welcome the strengthening of supporting text in paragraph 2.25 in line with our previous comments to include: *Where we live has a profound impact on our health and well-being, it is therefore important that new development **prioritises improving** the built, natural and social environment in Camden.*

We also note that supporting text has been added to Policy SC1 - Improving health and wellbeing (rather than policy DS1 or specific site allocations for residential schemes over fifty dwellings) stating '*...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.*'

Chapters 03, 04, 05 and 06: Site Allocations

S1 – South Camden, C1 – Central Camden and N1 – North Camden

Within policies S1 (South Camden), C1 (Central Camden) and N1 (North Camden) the delivery of an Integrated Care Hub is identified as a key infrastructure priority. As the needs of the NHS will change over time, ongoing consultation with the ICB will be required to ensure that the delivery of an Integrated Care Hub is the most efficient way to deliver its priorities.

C2 - Regis Road and Holmes Road depot

London Healthy Urban Development Unit

The site allocation does not make reference to the existing mental health facility owned by North London NHS Foundation Trust. We therefore suggest the following change to the policy wording:

*7. seek to retain existing businesses and **other users/ occupiers** that wish to stay on the site, where possible, and in particular uses that support the functioning of the CAZ or local economy. The developer should work with existing businesses and **other users/ occupiers** to understand their requirements, ambitions and the potential for reprovision or relocation. A business retention / relocation strategy must be provided as part of the planning application for the site;*

N3 – Queen Mary’s House.

HUDU understand the Royal Free London NHS Foundation Trust will provide detailed representations in relation to this policy. We wish to confirm our support for the inclusion of a higher indicative housing figure of 150 additional homes and the need for greater flexibility within the policy wording.

Chapter 10 – Supporting Camden’s Communities

Policy SC3 should be amended in order to align with London Plan Policy S1 - Developing London’s social infrastructure that states the loss of social infrastructure is acceptable if it supports a broader public service transformation plan requiring modern facilities to meet future needs.

Infrastructure Delivery Plan

We look forward to working with the Council to ensure the IDP reflects the latest forecast for health infrastructure and the needs of the wider community.

Conclusion

As outlined above, we welcome the overall vision and objectives the Proposed Submission Draft sets out for the Borough and all its communities, and we hope these comments are helpful.

We look forward, together with NCL ICB and NHS providers, to continuing to work with the Council as the plan progresses to adoption.

Yours sincerely,



Mhairi Summers



NHS London Healthy Urban Development Unit (HUDU).

Responder 594

Date: Fri, 27 Jun 2025 14:53:26 +0000
From: Vicky Cartwright
To: PlanningPolicy
Subject: Reg 19 reps - British Museum

Planning Policy
Camden Town Hall
Judd Street
London
WC1H 8EQ

27 June 2025

By email

Dear Planning Policy Team,

Draft New Camden Local Plan Reg 19 | Consultation response from the British Museum, Great Russell Street, London, WC1B 3DG

We are pleased to respond to the consultation on Camden's new Local Plan (Regulation 19), on behalf of our client the British Museum (BM).

In summary, BM is broadly supportive of the aims of Camden's new Local Plan and many of its draft policies, including those that aim to enhance cultural facilities in the borough. It has some concerns about specific policies which have implications for assessing it as 'sound', particularly in terms of the interaction and potential conflict between specific policies in the Plan, acknowledgement of the contribution made by and operational requirements of specific institutions in Camden, and consistency with national policy. BM's view is that the current Regulation 19 draft version is not sound in parts, because there are policies that are not fully justified, effective or consistent with national policy. We set out in detail the reasons for taking this view below, following a brief description of the context which is important for understanding the BM's position.

Below is a summary of the BM's key concerns/proposed amendments as set out in the remainder of the letter:

- Recognition of the BM: Explicitly acknowledge the BM's significant cultural and economic role in South Camden (Policy S1).
- Flexibility for large Listed Estates in Camden: Climate, design and biodiversity policies (e.g., CC1–CC8, D1, NE2) must accommodate the constraints of heritage buildings like the BM.
- Understand operational needs: Exempt cultural institutions from rigid office retention rules (Policy IE2) and allow flexible use of estate space.
- Respond to security requirements: Actively support development (Policy A2) that addresses specific threats (e.g., protests).
- Privately owned open space: Allow greater flexibility (Policy SC4) for privately-owned open spaces (e.g., BM's south forecourt).
- Expansion of Cultural Uses: Amend Policy SC6 to reduce burdens when expanding existing cultural floorspace.

The British Museum

The BM was founded in 1753 as the first national public museum in the world and has been open to the public since 1759. With approximately eight million objects in the collection, it is arguably the world's greatest display of human history, culture and art. Both permanent collections and special exhibitions are presented within displays for the public.

The BM's Bloomsbury estate is situated on the north side of Great Russell Street within the Bloomsbury Conservation Area (CA). It is bounded by Montague Place, Montague Street, Bloomsbury Street and Great Russell Street. The estate houses important listed buildings, including the Grade I listed Quadrangle Building, the King Edward VII Galleries north of the site and the Grade II* railings at the front.

The CA Appraisal refers to the BM as *"a cultural institution of international importance, occupying a major ensemble of outstanding Grade I listed buildings which make a significant contribution to the character and appearance of the conservation area as a whole"*. The Bloomsbury CA as a whole derives its special interest from its surviving early street

pattern, which is laid out in a rectilinear pattern with straight streets leading to open squares, which are often landscaped. The dominant architectural form is the townhouse, with some earlier 17th and 18th century examples surviving alongside later 19th century properties, though a large proportion have been adapted during the 20th century for office or other uses. The BM has recently updated its Conservation Management Plan (CMP) (2024) which provides a detailed review of the heritage significance of the Bloomsbury Estate and includes significance plans identifying the range of significance found across the site.

Surrounding uses and designations | The Bloomsbury estate is located in a mixed-use area, surrounded by a range of other uses including commercial office, hotel, residential and education uses. The BM is located in the Midtown BID district (Holborn, Bloomsbury, St Giles), an Archaeological Priority Area, the Background Strategy View (Blackheath), and the Central Activity Zone (CAZ). The BM is located within an area of excellent transport accessibility with a PTAL rating of 6b. It is close to Russell Square, Holborn, Tottenham Court Road and Goodge Street tube stations, several bus routes operate along Southampton Row and Bloomsbury Street. There are cycle networks in close proximity with secure bike stands. There is a Santander bike hire stand towards the junction between Great Russell Street and Montague Street.

The British Museum Masterplan

The BM is in the process of developing and delivering its Masterplan for the future of the Bloomsbury Estate, to ensure that it is fit for purpose and can maintain its position as a world class visitor attraction now and in the future. This transformation programme will address some of the most pressing global challenges of our times by creating a unique space for contemplation and debate, discovery and recognition, questioning and learning, enjoyment and revelation. The first phase of the BM masterplan is underway with the opening of the new British Museum Archaeological Research Collection in June 2024. Alongside this, progress is being made with the start on site of the Energy Centre Programme at the Bloomsbury Estate including the new East Road Building (ERB) and South West Energy Centre (SWEC). This will see the phasing out of the use of fossil fuels within the museum estate, replacing them with low carbon technologies, which will result in an estimated annual net saving of 1,700 tonnes of CO₂ compared to existing usage, enabling the museum to become more sustainable over the coming years. Future phases of the Masterplan are in development with the Visitor Welcome Programme (VWP), being led by architectural competition winners Studio Weave, now at pre-application stage; this programme will see the removal of the security tents and the delivery of a new enhanced security and visitor welcome over the interim (10 years) and then the longer term. Lastly, the Western Range project has commenced following the appointment of Lina Ghotmeh Architects after an international design competition. The Western Range project will reimagine a third of the Museum's galleries and the design team is about to embark on RIBA Stage 2. The BM is therefore particularly interested in the development of the new Camden Local Plan as this will guide development in the Borough over the next 15 years. The BM has been working with Camden as part of the Bloomsbury Vision, Holborn Vision and Holborn Liveable Neighbourhoods plan and, whilst not formally part of the Local Plan, the BM is broadly supportive of the emerging draft objectives and principles coming out of these supplementary documents.

The BM's response to the draft Local Plan – Regulation 19 Stage

The BM responded to the Regulation 18 consultation on the draft Local Plan in March 2024. We refer to those comments throughout this response to the Regulation 19 consultation, noting issues that have been addressed and where the BM has new or outstanding concerns. We have considered the legal compliance and soundness of the Plan, as required by this Regulation 19 consultation, and summarise the BM's view on the soundness of the draft Plan at the end of this letter. We have structured the remainder of the BM's response in the order that the policies appear in the Plan.

Chapter 03: South Camden

Policy S1 South Camden | Draft Policy S1 seeks to ensure that development in the South of the Borough (where the BM is located) 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. BM continues to be supportive of this policy, and its acknowledgement of the contribution the Knowledge Quarter (parts J and K), the medical and life sciences cluster (part M), higher education in the Bloomsbury campus (part N) and specialist employment at Hatton Garden (part O) make to South Camden. This is important to ensure these key Camden businesses, institutions and attractions are supported to sustain and develop their contribution to the borough. The BM considers that its own contribution to the cultural offer, tourist and visitor economy, and local employment provision in South Camden is also significant and should be clearly acknowledged and supported in this policy in the same way.

There are numerous references within draft Policy S1 to improved transport links, public realm, and walking and cycling routes, and generally increased permeability; this is also a feature of draft policies T1 and T2, and also SC1 and SC2. The BM is supportive of this emphasis on sustainable transport and public realm initiatives in the Plan, but reiterates the requirement that proposals for the pedestrianisation of GRS and Montague Place must maintain vehicular access for the BM to support its daily operations, as well as ensure access for emergency services. We note from LBC's website that a 'full public consultation' on the detailed designs for this scheme is planned for 'tbc 2025/2026' and the BM is working closely with the Holborn Liveable Neighbourhoods team and anticipates responding at the appropriate time to the updated proposals.

Chapter 07: Meeting Housing Needs

Policy H2 Mixed Use Development | Maximising the supply of self-contained housing from mixed-use schemes (in defined parts of the Borough including South Camden) requires a contribution to permanent self-contained housing from all development that provides an additional non-residential floorspace of 200sqm (GIA) or more. At the Regulation 18 consultation stage the BM expressed support for part B(3) which excludes developments which are publicly funded or otherwise serve a public purpose, provided that the public purpose is secured for a reasonable period, from being required to meet this. The BM maintains that it would be inappropriate to seek a contribution to permanent self-contained housing from a site such as the BM, being a charitable institution with a public purpose, and as a site too constrained to provide space for housing uses which would be unlikely to be compatible with museum use. The BM therefore welcomes the amendment to the supporting text (para 7.50) to include specific reference to 'museums' in the list of uses serving a 'public purpose' and which are therefore exempt from this element of the policy.

Chapter 08: Responding to the Climate Emergency

The BM continues to be generally supportive of the aims and ambitions of Chapter 08, to ensure development is designed to mitigate and adapt to climate change to respond to the climate emergency. As noted above, the BM is delivering its Energy Centre Programme which will reduce carbon emissions for the entire BM. For this reason, while the BM supports the aims of these individual draft policies, it remains keen that they are applied appropriately to future applications (including the Western Range) where there is an existing site-wide strategy in place to address these requirements.

CC1 Responding to the climate emergency | Draft Policy CC1 sets out the Council's expectation that development will prioritise the provision of measures to mitigate and adapt to climate change, and meet the highest feasible environmental standards during construction and occupation. The BM notes part 1 which prioritises the re-purposing and re-use of buildings over demolition but considers that this policy should take a case-by-case approach to understanding the particular constraints and issues for each particular site. It therefore welcomes the new reference in the Regulation 19 version of the supporting text for Policy CC1 that notes the need to read the policy in the context of others in the Plan, including D5 – Historic Environment, and is supportive of this acknowledgement that in responding to the climate emergency developers will need to have regard to balancing sustainability targets with specific site constraints. The BM would welcome further development of the policy wording and supporting text to explicitly acknowledge the tension between the requirements and constraints of listed buildings in the context of responding to the climate emergency, and some flexibility in the application of the policy to such sites to reflect this.

CC2 Prioritising the retention of existing buildings | BM also continues to endorse draft policy CC2 which prioritises the repurposing, refurbishment and re-use of existing buildings over demolition but, as noted above, remains of the view that this approach must be applied on a case-by-case basis with consideration for each specific site's constraints and needs.

CC3 Circular economy and reduction of waste | The BM notes the new supporting text for this policy in the Regulation 19 version of the Plan, which encourages consideration of waste reduction principles on smaller developments which do not trigger the requirement for a circular economy statement. The BM remains supportive of the principles of Policy CC3 but welcomes the acknowledgement that it may need to be applied more flexibly to specific developments which are balancing different considerations, including heritage.

CC5 Sustainability improvements to existing buildings (retrofitting) | The BM supports the principle of retrofitting existing buildings to make them more energy efficient and reduce the energy needed to occupy the buildings and welcomes the inclusion of new Policy CC5 in the Regulation 19 version of the Draft Plan, which sets out how the Council will support adaptations and improvements to existing buildings to improve their sustainability. The BM understands that where this is

applied to sensitive historic assets the approach to retrofitting must consider the heritage sensitivities of the particular building and balance the benefit against any harm considered to be caused. It is therefore supportive of part B of this policy which recommends whole building retrofit plans where works are proposed to a listed building and the supporting text for this policy which references the most recent Historic England guidance note on adapting historic buildings for energy and carbon efficiency.

CC6 Energy use and the generation of renewable energy | Although BM continues to be supportive of this policy, which supports adaptations and improvements to existing buildings to make these more energy efficient and reduce the energy needed to occupy buildings, it notes the previous part iv (Regulation 18 version) - which reduced the requirement for reduction in energy demand for heating in listed buildings – has been removed from the current draft. BM regrets that this important recognition of the potential constraints posed by listed buildings has been lost and this risks undermining other policies in the Plan that support an approach that appropriately balances sustainability and heritage considerations. The BM is home to a significant collection which requires suitable temperature conditions – as such the need for heating and cooling may be greater than within other listed buildings. The BM does not consider that the way this has been re-framed in the Policy wording – ‘unless demonstrated to the Council’s satisfaction that it (*the required reduction*) is not feasible’ – appropriately recognises this in the same way. In contrast, the BM welcomes the recognition in the supporting text of the Regulation 19 version that there may be constraints - such as heritage – to achieving the requirement for non-residential development involving the conversion/extension of 500sqm or more to achieve a minimum of BREAAAM Excellent. It suggests that the same flexibility for sites with heritage constraints should apply to the whole of Policy CC6 and that this is essential so that it does not conflict with other policies in Chapter 08 or in other parts of the Plan.

CC8 Overheating and Cooling | This policy includes the requirement to demonstrate the need for new and/or additional active cooling systems or units and that all other feasible measures in the cooling hierarchy have been integrated into the development that (previously included in Policy CC1 in the Regulation 18 version of the Plan); it also includes a new requirement for developers to seek to minimise the environmental impact of the operation of air-conditioning units and heat pumps. The BM continues to 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. Without such flexibility, this policy has the potential to undermine other key policies in the plan that seek to support key contributors to Camden’s economy, such as the BM and other institutions with specific energy or infrastructure requirements.

Chapter 09: Delivering an inclusive economy

Policy IE1 Growing a successful and inclusive economy and IE2 Offices | These policies generally restrict the loss of office and employment floorspace in Camden. The BM wishes to highlight that the application of this to *all* such floorspace within the borough is likely to limit the sustainability and growth of certain parts of the borough’s economy and cultural offer. For large institutions such as the BM, spaces within its estate are required to serve different purposes over time, and may need to move in and out of different planning use classes – including as offices - to continue to fulfil the BM’s needs. BM requests that this need is specifically acknowledged in this policy; without this amendment, this policy is at odds with others in the Plan (e.g. SC1, SC6) and the overarching aim of Policy IE1 to support and contribute to a successful Camden economy and wider offer.

To achieve this, office or other employment spaces that form part of the estate of larger institutions should be excluded from this restriction on loss provided they continue to be used by that institution to support delivery of its offer. This could include cultural institutions such as the BM, but also others identified as being from growth or key sectors in the borough such as medical, life sciences, Knowledge Quarter or higher education institutions. Alternatively, it may be appropriate to restrict the application of this policy to floorspace over a certain size to allow smaller office spaces greater flexibility to change to alternative uses where they do not satisfy the demands of modern office occupiers.

Chapter 10: Supporting Camden’s Communities

SC4 Open Space | The BM notes that this policy seeks to protect all designated public and private open spaces in Camden, revisiting development on them except in specific circumstances. In exceptional circumstances (Part B, 4) small-scale development on open space will be considered, provided the proposal ‘meets a demonstrable need’ and ‘is associated with the use of the land as open space and contributes to its use and enjoyment by the public’. The BM is broadly supportive of this policy and recognises the contribution open spaces make to both residents and visitors to the borough. However, the

policy as it is currently written does not account for privately-owned designated open spaces such as the BM south forecourt, which sits inside the boundary of the BM's site and which the BM operates as an open space for BM visitors to the extent that it is able to when considering the security threat and operational requirements of the site. For private open spaces such as this, it is reasonable to expect that the owner and Council will work together to ensure protection of the open space in a way that safeguards and does not unduly restrict the use of the wider site for its main purpose. The BM has ambitions to improve wider public access to the south forecourt public open space as part of the VWP, however this is on the basis of the BM being the ultimate owner of this space and needing to balance the needs and requirements of the BM and control the space as it needs. The ambitions of Policy SC4 Open Space need to be balanced with the aims of Policy A2 Safety and Security. BM requests that wording to acknowledge additional flexibility in the operation of public open space in private ownership is added to either the policy or supporting text.

SC6 Supporting cultural facilities | The BM remains supportive of this policy (previously SC5 in the Regulation 18 version), which states that the Council will protect existing cultural facilities and manage the impact of adjoining uses applying the Agent of Change principle, as it acknowledges the significant contribution museums make towards the attractiveness of a place to live, visit, work and study, and therefore promotes the retention of these facilities. The BM is a long running national institution located in the heart of Camden, which has contributed significant value towards education and learning, as well as creating a significant draw for visitors and tourists, resulting in wider economic benefits for hospitality and retail uses. The BM notes the change in the wording of the part of the policy that deals with proposals for new or re-located cultural facilities, or additional floorspace (part D) which previously *'may'* have required the provision of information relating to potential impacts on the continuing operation of existing cultural facilities nearby, the contribution to the delivery of local arts and cultural strategies, and details of shared use/daytime use of the facility by other cultural or community organisations, including on a temporary/*'meanwhile'* basis, and now *'will'* require this. The BM considers that it is unreasonable and unfeasible to require this of every increase in floorspace it proposes, especially given the upcoming WR Project which may increase floorspace within the BM site and which would be entirely appropriate for a National Institution of this nature. To have to address SC6 (part D) in this way would create undue burden on the BM, and other, similar institutions, that require flexibility in the way their floorspace is utilised to support their offer. This requirement undermines other policies in the Plan that seek to support cultural facilities and their contribution to the success of the wider borough.

Chapter 11: The Natural Environment

NE2 Biodiversity | The BM supports draft policy NE2 Biodiversity, which is aligned with national legislation for Biodiversity Net Gain (BNG). The BM regularly submits a number of minor planning applications throughout the year some of which may trigger the mandatory BNG requirement (others may be considered *de minimis*) – therefore the BM would be open to discussing a site-wide strategy approach for the entire BM estate rather than a piecemeal approach associated with every minor planning application which would likely be more efficient and deliver greater enhancements overall. In this regard, the BM welcomes the addition to the Regulation 19 version of the Plan of the supporting text at paragraph 11.45 which acknowledges that the delivery of BNG will vary depending on the site. It requests that this text is further augmented to include reference to a site-wide approach to BNG delivery where this is appropriate for large Estates in Camden and is agreed with the Council.

Chapter 12: Design and Heritage

D1 Achieving design excellence | The BM remains supportive of draft policy D1, which seeks to achieve excellence in the architecture and design of buildings and places. It notes that this Regulation 19 version of the Plan retains the wording in part B, 3 which states that the Council seeks to *'preserve and where appropriate enhance the historic environment and heritage assets'*. The BM reiterates Historic England's advice in its *'Conservation Principles policies and guidance'* that *"to preserve', even accepting its established legal definition of 'to do no harm', is only one aspect of what is needed to sustain heritage values. 'To sustain' embraces both preservation and enhancement to the extent that the values of a place allow. Considered change offers the potential to enhance and add value to places, as well as generating the need to protect their established heritage values. It is the means by which each generation aspires to enrich the historic environment'*. Reflecting on the Historic England guidance the BM considers that policy D1 part B, 3 could be reworded to seek the *'conservation and enhancement'* of heritage assets. This would better reflect the wording of Policy D5 Historic Environment which has been updated since the Regulation 18 stage to *'conserve'* rather than *'preserve'* heritage assets. BM notes that both terms are used throughout various parts of the Plan and suggests these uses should be reviewed to ensure the intended meaning is being conveyed in each instance.

Chapter 13: Protecting Amenity

A2 Safety and security | This policy in its current form is framed in terms of development being required to consider safety and security. The BM requests that it is amended to explicitly support development whose purpose is to enhance the security and/or safety of buildings or spaces in Camden in response to demonstrable security threats. The BM faces specific security threats, including the threat of protest and direct action, that are likely to require it to periodically review and update its security arrangements; which may in turn require changes to operations. Acknowledgment of this in this policy would support the BM to be able to respond more quickly and effectively to the changing security environment. Any new wording should also acknowledge the potential tension between the need to pursue development that provides greater security and the aims of other policies in the Plan, for example that aim to increase permeability and access. In such cases a sensible balance will need to be struck between achieving the aims of the Plan and maintaining the security of important institutions in Camden, such as the BM, to allow them to continue to operate effectively and contribute to prosperity of the borough.

Soundness of the Camden Draft Local Plan (Regulation 19)

The BM recognises that Local Plans are assessed to determine whether they have been prepared in accordance with legal and procedural requirements and whether they are ‘sound’ in accordance with paragraph 35 of the National Planning Policy Framework (NPPF). To be considered sound, a plan must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Having reviewed the Regulation 19 Draft of the Camden Local Plan, the BM considers that several policies within the Plan, as currently drafted, do not fully meet the tests of justification, effectiveness, or consistency with national policy.

1. Justified

- Policy S1 (South Camden) fails to explicitly acknowledge the BM’s major role in the area’s cultural, visitor and employment offer. This omission undermines the spatial and economic justification of the policy.
- Policy IE2 (Offices), in restricting loss of employment floorspace, does not account for institutions’ needs to flexibly reconfigure estate uses over time. A tailored exemption is justified for large institutions like the BM.

2. Effective

- Sustainability and Heritage (especially policies CC1, CC5, CC6, CC8): BM supports Camden’s sustainability aims but notes that the lack of flexibility for listed buildings (e.g. in CC6) undermines deliverability for heritage sites. Climate policies must be applied case-by-case, acknowledging site-specific constraints. Supporting text should go further in recognising the tension between sustainability goals and heritage limitations.
- Policy IE2 (Offices) would hinder operational flexibility unless estate-based cultural institutions are exempted from rigid floorspace retention rules.
- Policy A2 (Safety and Security) should be amended to explicitly support development responding to demonstrable threats, such as protest action. The policy should also acknowledge the need to balance security infrastructure with broader Plan objectives (e.g. permeability).

3. Consistent with National Policy

- Policies D1 and D5 (Design and Heritage) use ‘preserve’ and ‘conserve’ in relation to historic assets inconsistently. As per Historic England’s Conservation Principles, ‘conserve’ is the preferred term that captures both preservation and enhancement. Language across the Plan should be standardised to reflect this.

Conclusion

In summary, while the BM remains broadly supportive of the policies proposed in the draft Local Plan, it does not agree that the Regulation 19 version fully meets the tests of soundness for plan-making. It proposes some additional amendments to the draft Plan that it considers should be actioned. The BM would be pleased to discuss any of the issues raised with LB Camden at its convenience

[redacted]

Yours sincerely,

The Planning Lab

Responder 595

Date: Fri, 27 Jun 2025 14:54:35 +0000

From: Andrew Russell

To: PlanningPolicy

Subject: Camden Local Plan Reg 19 consultation - Places for London response



Date: 27/06/2025

Our ref: TfL/PfL/VSH/AR – CamdenReg19

Planning Policy Team
Camden Town Hall,
Judd Street,
London, WC1H 8EQ

Sent by email: planningpolicy@camden.gov.uk

Dear Sir / Madam

Camden draft Local Plan Reg 19 – Proposed Submission Version Places for London Response

Thank you for providing the opportunity to comment on the Draft Camden Local Plan (Regulation 19) Proposed Submission Version.

Please note that the views expressed in this letter are those of Places for London in its capacity as landowner and developer only, and do not form part of the Transport for London (TfL) response in its role as transport operator and highway authority.

Places for London

Places for London is TfL's financially independent property development company. TfL is one of the largest landowners in the capital with over 5,500 acres of land across the capital, including highly accessible land and buildings on or next to stations, bus and highways infrastructure. Our mission at Places for London is to release more of the untapped potential on TfL owned land by improving existing property assets and by building homes and workspaces to meet the growing needs of our city. We aim to create high quality places for Londoners to live, work and play which are sensitive to local needs and communities and improve access for all. Across our existing asset management portfolio we provide space for over 1,500 businesses in TfL stations and railway arches and on London's high streets.

Strategic collaboration between Places for London and Network Rail

Places for London and Network Rail have formed a strategic collaboration to develop homes, workspaces and connected neighbourhoods for London's communities, underpinned by the delivery of sustainable and accessible transport infrastructure. Together we are amongst the capital's largest landowners. With more than 600 stations and almost 14,000 acres of land across our combined portfolios, we are hoping to deliver thousands of new homes and jobs over the next decade. Our partnership marks a new era of joint working between the public and private sector, between transport operators and local authorities.

This representation has been agreed as a joint submission between Places for London and Network Rail

TfL land ownership interests within the borough

Places for London has ownership interest in a number of significant potential development sites in the borough, including at the Camden Town over station development site and at the former Thameslink Station site on Pentonville Road, where we have joint land ownership interest with Network Rail. In addition to this, we also have further own land at Kentish Town London Underground Station (which is adjacent to Network Rail owned Thameslink station) and at West Hampstead Station.

Our comments on the Reg I9 draft Local Plan focus on the following key areas:

- Site Allocation SI3 – Former Thameslink station, Pentonville Road
- Site Allocation Policy CI7 - Camden Town over station development
- Policy H2 – Maximising the supply of self-contained housing from mixed use schemes
- Student accommodation (Policy H9 and H4D)
- Policy CC2 – Prioritising the retention of existing buildings
- Policy D2 – Tall buildings

Site Allocation SI3 – Former Thameslink station, Pentonville Road

This site forms part of our strategic collaboration Places for London and Network Rail. We therefore welcome its identification as a site allocation. However, we are concerned that the site allocation boundary has been reduced significantly since Reg I8 stage. The revised boundary does not reflect the extent of our joint TfL and Network Rail ownership or the most optimal form of development which we would ideally intend to bring forward on the site.

Key plan



Site plan



Area

0.06 hectares

Allocated Use

Employment (including research and knowledge-based uses, maker spaces, offices), and permanent self-contained homes

Site allocation boundary

The revised site allocation boundary now only includes the disused / vacant ticket hall building as shown above. Previously, the site allocation in the Regulation I8 version of the draft Local Plan included the Scala, 366 Gray's Inn Road and the Thameslink and Metropolitan Line tracks.

We do not object to the removal of the Scala given this use is protected by London Plan and Camden Local Plan policy.

However, the removal of 366 Gray's Inn Road and the Thameslink and Metropolitan Line tracks removes the potential to bring forward a more comprehensive decked development and would be sub-optimal.

We believe that the site allocation boundary should follow the red line boundary below which would therefore allow both options to come forwards. This excludes the Scala.



A: Metropolitan Line Tracks – London Underground freehold

B: Thameslink tracks – Network Rail freehold, London Underground flying freehold (airspace rights)

C: Disused Ticket Hall – Network Rail freehold, London Underground beneficiary of profit share agreement

D: Scala nightclub (excluded) – London Underground freehold, Places for London leasehold

E: 366 Gray's Inn Road – London Underground freehold, Places for London leasehold



We are currently working on a joint development feasibility study as part of our strategic collaboration between Places for London and Network Rail. This ongoing work is testing a variety of development and land use options in partnership with key stakeholders. It focuses on the site boundary shown here because this reflects TfL and Network Rail ownership. As part of this study, we will consider various potential development options. This includes redevelopment of just the former ticket hall building, but also a more comprehensive decked development solution which would involve development above tracks with structures landing at 366 Gray's Inn Road. Whether we progress the more comprehensive decked development option (or the more reduced ticket hall site area only) will ultimately depend on economic viability and overall deliverability.

Demolition and redevelopment of 366 Gray's Inn Road is likely to be required to enable a more comprehensive redevelopment proposal including decking of the rail and tube lines to the rear, as this land area would be needed to facilitate supporting columns and the deliverability of a decked over track development.

The King's Cross Conservation Area Statement notes that both the disused station entrance building and 366 Gray's Inn Road detract from the character of the conservation area. High quality replacement buildings on both sites would remove these detracting features.

We understand that the reduced site allocation boundary was because planning policy officers considered that there is no evidence or feasibility work to date to support the view that a decked / 'over-track' development would be viable or deliverable, which is a key test for site allocations. However, this is not the case.

We undertook detailed work during 2017 which tested various decked development options (illustrative information below). This work culminated in a pre-application meeting and advice note which LB Camden officers should have on file (Camden Ref: 2017/3794/PRE). The work was informed by a significant amount of architectural, structural engineering, cost consultant work as well as planning, heritage and townscape. We will share the 2017 technical work with the Council and intend to share updated feasibility work in due course.

An example of this type of decked engineering solution being successfully delivered above a Network Rail asset can be found nearby at [Holburn Viaduct](#)

Land use

In terms of land uses, the site allocation seeks *'employment (including knowledge-based uses, maker spaces, offices) and permanent self-contained homes.'*

We recommended the site allocation provides an appropriate degree of flexibility in terms of the exact land use mix required. It is recommended that the allocated uses is more general and is widened to include hotel and student accommodation and also enable retail and food and beverage uses to be provided to activate Pentonville Road. We suggest the following revisions:

'Allocated Use: Employment ~~(including knowledge-based uses, maker spaces, offices)~~ and / or hotel, student accommodation and permanent self-contained homes with scope for retail and food and drink uses at lower levels.'

The exact land use mix would depend on which land use performs best in terms of viability and deliverability and responding to the particular site constraints associated with building over live rail and tube lines and in terms of the relationship with the adjacent to night time uses.

Housing

The site allocation sets out an estimated housing capacity of 22 homes but acknowledges that this should relate to the scale of additional floor area proposed. We recognise that the Council's priority land use is housing. However, it should be noted that building conventional self-contained housing in Class C3 use above and immediately adjacent to live rail and tube lines and operational infrastructure is likely to be challenging.

The immediate urban context is relatively sensitive in terms of the adjacent night time uses present at the Scala, the Big Chill and Jamboree which would be a consideration for any future planning application in terms of the agent of change principle.

Other forms of non-conventional housing such as student accommodation or hotel uses might be more compatible with the immediate context and might enable housing provision on either less constrained parts of the site to the rear or potentially off-site. We therefore welcome the inclusion of the following text in the Development and Design Principles (3):

'seek to include housing on site, provided it can be demonstrated to be compatible with the two nearby late night uses, the train tracks to the rear, and the busy nature of Pentonville Road.'

Development and design principles

The site does not fall within the locations where the draft new Local Plan indicates that tall buildings may be an appropriate form of development. However, given the site is within the CAZ, tall buildings would be defined as being over 40-metres as shown in Figure 22.

We also note that Policy D2 provides a criteria for assessing planning applications which include buildings above the draft Local Plan height thresholds. These types of applications would be assessed against the design criteria in Policy D1 and wider planning and design factors set out in Policy D2 Part C. This is a sensible and pragmatic approach which is welcomed.

The site allocation is located in a highly prominent position on Pentonville Road, which falls within the Central Activities Zone (CAZ) and lies just outside the Kings Cross St Pancras Opportunity Area. The site benefits from excellent public transport access levels (6b), being well-served by a range of tube, rail and bus services and walking and cycling infrastructure in the surrounding area. We therefore consider that the site could be an appropriate location for a well-designed high density mixed use development with stepped massing which responds positively to the surrounding heritage context.

Site specific development and infrastructure constraints associated with decking over live rail and tube lines, mean that the development will need to be optimised to ensure a viable and deliverable scheme. We therefore welcome that the site allocation states that: *'development must ensure that a design-led approach is taken to delivering the optimum amount of development on the site.'*

Infrastructure requirements

The proposed wording is supported and ensures any development is taken forwards with the relevant transport providers to establish whether there is a need to retain an entrance / exist and ticketing area for the London Underground station.

Site Allocation Policy CI7 - Camden Town over station development

We welcome the draft site allocation which provides a clear expectation for the comprehensive redevelopment of the site to deliver a new station entrance linked to the existing station with over station development above.

Camden Town Station capacity upgrade is a project of strategic importance to TfL to provide step-free access and address overcrowding and circulation issues within the station, particularly the interchange capacity between the two Northern Line branches. The upgrade is an essential enabling component of a future Northern Line upgrade which would allow more than the current 24 trains per hour. These capacity issues are expected to be exacerbated once High Speed Two services arrive at Euston. As such, the station upgrade is of strategic importance, not just for Camden, but London more widely.

Whilst there have been previous iterations of the station enhancement scheme over the last two decades, none of these have progressed to date. This is primarily due to the substantial costs of projects such as these and a lack of available funding. Currently, TfL has no certainty of capital funding, so delivery of the project will require partners to make the case to Government for capital funding for the scheme. Nevertheless, this project remains a priority TfL is seeking to deliver once sufficient funding becomes available or as opportunities to progress design and delivery arise with the local authority and / or other stakeholders.

Over station enabling development is a key element to facilitate the delivery of the station upgrade projects by generating development value to unlock the project and also optimising

the development potential of the site. It would also enable efficiencies in the construction and delivery of the station to be secured.

Places for London and TfL are working with planning and design officers at Camden Council to explore and test various potential development and land use scenarios for an over station development site. This positive and collaborative design-led approach is welcomed and will need to be an ongoing process as the over station development project progresses.

As mentioned in our Reg 18 representation, we are keen to continue to explore opportunities to identify and unlock third party funding which could help fund the proposed station improvements. The Council is encouraged to make full use of available/future funding sources, for example, Community Infrastructure Levy, S106 financial contributions in the nearby area. This approach has assisted in part funding the delivery of the new station at Colindale (Barnet), alongside essential public funding. CIL-in kind delivery models may need to be explored to address the overall development cost and potential funding gap.

Site boundary

Revisions to the proposed Ref 19 site allocation boundary is supported and reflects the changes we sought in our Regulation 18 representations in which we requested the inclusion of Buck Street Market, the TfL owned vent shaft (both in TfL ownership), together with Buck Street itself.

A single site allocation boundary covering all of TfL's landownership north and south of Buck Street ensures that the entire enabling development (OSD) can be covered by the same planning application boundary, which is how we would envisage phasing and delivering the scheme. The inclusion of the entirety of Buck Street also ensures that the design and improvement of this critical east-west route is comprehensively considered as part of the overall masterplan for the site. We therefore strongly support the proposed site boundary shown below.



Land use

The allocation seeks permanent self-contained homes and student accommodation, alongside employment uses (maker space / creative industries and offices) retail and food and drink uses at ground floor level.

We welcome the inclusion of student accommodation uses, which is in line with our Representations at Reg I8 stage.

We also welcome that the site allocation policy is not overly prescriptive about the mix of land uses. It is critical that the site allocation is sufficiently flexible and responsive over time and is appropriately ambitious. A compatible and appropriate land use mix will be required, as well as a viable and deliverable form and quantum of over station development.

A range of potential land use options are currently being reviewed and has not been determined. However, we currently consider that the particular characteristics of the site location and over station development would lend itself to a mix of student, hotel and employment uses, with retail and F&B uses at ground floor level to provide good levels of activation of the public realm.

Station infrastructure should be added to the allocated land uses.

Hotel accommodation

Hotel accommodation is not currently listed as an allocated land use. We would suggest that it should be considered as a potential land use, given the site location and characteristics. This would be alongside other complementary land uses and as part of a comprehensive mixed use scheme.

Our rationale is as follows:

- The site is located within a Major Town Centre location which Policy IE5 states is appropriate for medium sized hotel and visitor accommodation.
- Camden is an internationally renowned and tourist destination (Camden Market) and has an established mixed use / tourism character.
- The site benefits from excellent access to other nearby tourist destinations by walking, cycling or public transport.
- Hotel accommodation in this location as part of a comprehensive mixed use development would complement and not harm balance of land uses in the area and the character of the area.
- Hotel accommodation could be provided on part of the site without resulting in the loss of permanent residential use or office uses.
- The site can therefore play a role in meeting demand for hotel and visitor accommodation in an appropriate and sustainable location, in line with the spatial criteria in Policy IE5B, London Plan Policy EI0 and the sequential approach in the NPPF.
- Importantly, from a deliverability perspective, hotel accommodation could be compatible and viable use as part of an OSD. It could more easily be co-located with below ground station infrastructure compared to residential use in terms of operational and ownership constraints.

Therefore, we consider that hotel use would accord with the principles set out in draft Local Plan Policy IE5 (Hotels and Visitor Accommodation) and there is a justification for it being listed in the allocated land uses for the site.

Housing

The site allocation requires self-contained housing to be optimised on the site in accordance with Policy HI (Maximising Housing Supply) but notes that where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built student accommodation). This flexibility is welcomed.

The site allocation states that the site has a residential capacity of 58 homes. Whilst we recognise that housing and, in particular, affordable housing is the Council's priority land use, there are certain site specific operational transport constraints which should be recognised. The provision of traditional leasehold or affordable homes directly above a new station box may not be achievable. In addition, the potential for self-contained housing may also be constrained on certain parts of the site which are adjacent to the pub and the Electric Ballroom, given these are established night time venues which are protected in line with the Agent of Change principle.

We therefore welcome that these points are referenced in site allocation development / design principles (points 5, 7 and I4).

Development and design principles

We support the content and wording of design and place making principles set out in the site allocation, including specifically:

- providing active frontages along Camden High Street, Buck Street and Kentish Town Road and improved public realm particularly along Buck Street;
- exploring the creation of a new civic space in front of the station entrance to create a strong sense of arrival from new station;
- ensuring a design-led approach is followed to optimising development;
- responding positively and sensitively to local context and character and the two conservation areas; and
- not cause harm to continuing operation of the Electric Ballroom, including appropriate noise mitigation measures in line with Agent of Change principle.

An appropriate degree of flexibility is key to deliverability as this is a complex operationally led development. The design, layout and land use approach of the OSD will need to be compatible with the new station and associated below ground infrastructure. To be deliverable, the land use mix will also need to be viable at the point in time when the scheme is to be delivered in terms of market circumstances.

We therefore strongly support the following text at point I4:

'Development must...be designed to work effectively alongside Transport for London's existing, enhanced or new infrastructure.'

Height and massing

The site allocation seeks to ensure a transition in scale and building height across the site from the lower rise Stucley Place towards Kentish Town Road. This is an appropriate and well-considered overall massing approach which is supported.

The site does not fall within the locations where the draft new Local Plan indicates that tall buildings may be an appropriate form of development. However, we also note that Policy D2 provides a criteria for assessing planning applications which include buildings above the draft Local Plan height thresholds. Such schemes would be tested against the design criteria in

Policy D1 and wider planning and design factors set out in Policy D2 Part C. This is a sensible and pragmatic approach which is welcomed.

The development and design principles should acknowledge and incorporate the findings from page 195 of the Council's Tall Building Study (2024) which recognise that a larger / tall building on the site *'could help to make optimal use of the area and help deliver infrastructure and mixed use in a highly accessible location. It could also help with wayfinding to the new station entrance.'*

Text should be added to note the potential for the height and massing to play a key role in marking the location of the new station entrance, supporting wayfinding and legibility.

Infrastructure requirements

This section of the site allocation is supported. However, paragraph I5 should state *'provide step-free access to Camden Town Underground Station and capacity improvements.'*

We support the new text which states that development must *'contribute towards improvement at Inverness Street Market.'*

Policy H2

This policy requires housing and affordable housing from mixed use schemes, with a 50% target applied to net additional floorspace proposed (GIA).

Part B.3 of Policy H2 states that the target is not applied to development which is publicly funded or otherwise serve an acknowledged public purpose, providing this is secured. This is welcomed.

Paragraph 7.50 goes on to confirm that the Council 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.'*

This is welcomed.

Part C.5 of Policy H2 and paragraph 7.50 specifically mention Euston stations (HS2 and National Rail) projects and notes that the particular challenges associated with funding and operational infrastructure will be considered when applying this policy.

We consider that this should also be widened to include the Camden Over Station Development site allocation. Alternatively, a new line could be added to the policy which acknowledges the challenges in delivering new public transport infrastructure schemes generally, eg step-free access and station capacity enhancements.

Student housing

Policy H9 and Policy H4D enable conventional self-contained affordable housing on student housing schemes as an alternative to the London Plan Policy H15 requirement for affordable student accommodation. This reflects the Council's priority housing need which is for conventional affordable housing.

Policy H4D and paragraph 7.31I state that this alternative approach will be strongly encouraged. However, this would only be where feasible, having regard to whether developments are able to include separate blocks and / or stair / lift cores. It is noted that conventional affordable cannot be fully integrated into student accommodation. This is supported.

We support this flexible approach.

The Council has applied this approach recently at 100 Chalk Farm (Ref: 2024/0479/P) and Jamestown Road (Ref: 2024/4953/P) which has helped to deliver much needed affordable housing. This approach seems to be working in practice and can be applied flexibly based on the site circumstances.

Policy CC2 – Prioritising the retention of existing buildings

This policy prioritises retention and improvement of existing buildings over demolition. Applications which include substantial demolition will need to be justified by building condition and feasibility assessments and development options appraisal. Substantial demolition will only be permitted where it can be demonstrated to the Council that:

- there are significant structural issues with existing buildings which prevent retention and improvement;
- feasible alternative options have been comprehensively explored; and
- the proposal constitutes the best use of the site and optimises site capacity.

Whilst we support the overall objectives set out in Policy CC2, we consider that greater flexibility is required where public transport infrastructure schemes noting the complexity and wider associated public benefit, for example, the Camden Town Over Station Development site allocation. This would be an operationally led infrastructure project, with the location of the station box and associated station box driven primarily by the need to provide the most optimal, cost-effective and deliverable connection to the existing below ground tube infrastructure assets and to ensure viability and buildability in terms of cost and timescale.

As part of any planning application, we would seek to demonstrate that the principles and criteria set out in Policy CC2 are being complied with in terms of evidence and alternative options, albeit we are concerned that this would add a further layer of uncertainty and potential delay to the planning and design process. This would also potentially run concurrently to a Transport & Works Act Order. The approach should therefore be proportionate.

Paragraph 8.25 states that: *where substantial demolition is proposed, developers will be expected to demonstrate that the benefits associated with the proposal are substantially greater than those that could be realised through a retention scheme.*

We consider that this text is a fundamentally important element ensuring the appropriate application of the policy and should therefore be included in the policy itself.

Paragraph 8.24 should also specifically mention public transport infrastructure.

These changes would therefore address our concerns highlighted above in terms of the application of this policy to the Camden Town OSD scheme.

Policy D2 – Tall buildings

We support this policy. The approach is in line with London Plan Policy D9 in that it defines what comprises a tall building in different locations within the Camden and identifies specific locations where tall buildings may be an appropriate form of development and sets appropriate heights in these locations.

Critically, Part C sets out how the Council will assess tall building proposals above the height thresholds set out on Figure 22 and site allocations. These applications would be assessed against the London Plan tall buildings criteria, the design criteria in Policy D1 and the criteria set out at Part C of Policy D2.

This is a sensible and pragmatic approach which we strongly support and provides an appropriate degree of flexibility on this sensitive issue.

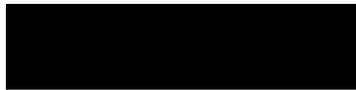
As recognised in the Towards a New London Plan consultation document (Section 4.2), this is an important element of how the London Plan policy on tall buildings functions as, irrespective of the location, every planning application must be judged on its own merits against policy criteria and also taking into account any other material planning considerations.

Maximising the supply of affordable housing is listed as a factor to consider in Part C, 5. However, this should not be the only public benefit given consideration. Other important public benefits such as public transport infrastructure (eg. Station capacity improvements and step-free access) should also be listed in the policy criteria. We therefore suggest the following change:

- '5. *whether the proposal maximises the supply of affordable housing in accordance with Policy H4 (Affordable Housing), or other public benefits such as public transport infrastructure improvements including station capacity improvements and step-free access;*

We hope you find our response helpful in formulating the draft Local Plan and we would welcome the opportunity to engage and further collaborate in the delivery of these two key sites.

Yours faithfully



Andrew Russell



Date: Fri, 27 Jun 2025 14:56:27 +0000
From: Paul Aikkila
To: PlanningPolicy
Subject: Camden local plan

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Planning Policy team

In response to your ongoing consultation on the Local Plan 2025 I wish to make the following comments:

1) Policemen on the Kentish Town police station would appreciate a covered / enclosed parking lot for their vehicles going forward, especially during the long winter months. It would, for the benefit of local residents, and those residents who will live in the new build that is contemplated, that such facility be soundproofed. The police forces are required to test their sirens and klaxons prior to starting every shift, and this can be pretty much at any hour of the day or the night (often all the way up to midnight and sometimes this starts at 6am). And it's loud ! This should be fixed.

2) the proposed location for the Regis Road Recycling Centre is unacceptable. I invite you to refer to the collective response which has been sent to you, which was started on Monday 23 June and attracted in excess of 360 signatures over the course of three days. You will recall that on all questions but one in the nov-dec 24 consultation, less than 10 people referred to the recycling centre as something that should be kept (to the question pick your top 5 infrastructure priorities, the number was 23 !).

3) A viable alternative could be to close this recycling centre facility entirely, albeit I understand that there are political party line dynamics at play that are not ground in practical planning reality which have made Council willing to retain a recycle centre here. The only in Islington holloway road may well be enough (and it looks like its capacity could be expanded if required).

4) you may also want to consider collection based services for bulky items (which also would be greener!) as an alternative to the recycling centre, similar to what you see in other major european cities. Inner city aggregation of waste is not really logical solution here.

I am also letting you know that I wish to participate in the oral hearing, if there is one.

I may also send you further emails of comments as I understand there may be an extension of today's deadline (such extension should of course be for the benefit of everybody, not just a few select parties).

Kind regards
Paul

Responder 597

Date: Fri, 27 Jun 2025 14:57:01 +0000

From: Meares, Jonathan

To: PlanningPolicy

Subject: City of London Corporations representations Draft Camden Local Plan

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Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

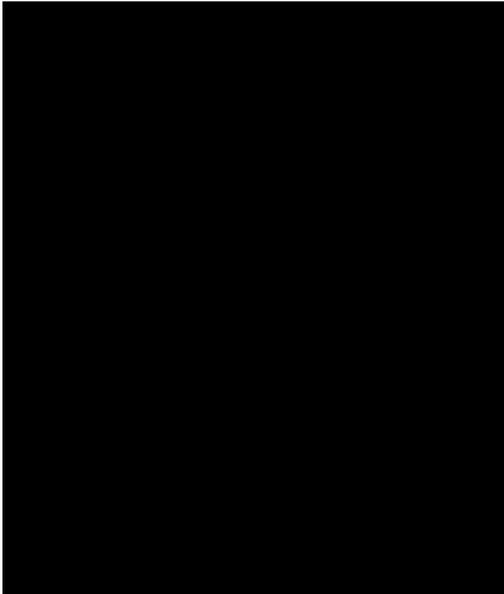
Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Jonathan"/>	<input type="text"/>
Last Name	<input type="text" value="Meares"/>	<input type="text"/>
Job Title (where relevant)		<input type="text"/>
Organisation (where relevant)		<input type="text"/>
Address Line 1*		<input type="text"/>
Address Line 2		<input type="text"/>
Post Town*		<input type="text"/>
Post Code*		<input type="text"/>
Telephone Number		<input type="text"/>
E-mail Address		<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation: City of London Corporation

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph	19, page 109	Policy	Policy C1	Policies Map	Figure 12
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4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	Yes	No	
(2) Sound	Yes	Yes	No	
(3) Complies with the Duty to co-operate	Yes	Yes	No	

*See guidance note at the end of the form for assistance with completing this section.

If you have entered *No* to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	
(4) Consistent with national policy	

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6. Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

We are writing to support the draft Local Plan proposal for a Camden Nature Corridor. The City of London Corporation is dedicated to maintaining Hampstead Heath as a biodiversity-rich resource in Camden. New housing proposals create a unique opportunity to link Hampstead Heath, our Metropolitan SINC, with smaller SINC's to the south, providing benefits for biodiversity, climate change adaptation and the well-being of residents. The corridor will support the 'Hampstead Heath vision 2017' (a shared community aspiration) that the fringes of the Heath are protected from encroaching urbanisation with expanding green corridors linking to a wider network of green spaces to enhance biodiversity and improve the air we breathe.

The proposed corridor will also support priority 1 of the Hampstead Heath Management Strategy (2018-2028) in that a mosaic of natural habitats is maintained and flourishes. This will be assisted by encouraging and enhancing connectivity of area of conservation value, both on the Heath and beyond its borders, to enhance the wider habitat network. Therefore, we strongly support Policy C1 paragraph 19 and Policy N1 paragraph 7 to create this Corridor from Hampstead Heath through North and Central Camden, and also the proposal that the Corridor be specifically included in future development of Murphy's Yard (paragraph 31, page 120), Regis Road (paragraph 33, page 116) and West Kentish Town Estate (paragraph 7, page 148).

Local Nature Recovery Strategies (LNRS) are a mechanism to deliver the Lawton Review (2010) recommendations at a local scale, making ecological networks bigger, better and more joined up, restoring, creating and connecting habitats. Some of these strategies may involve improving connections between green infrastructure which would rely on habitat increase in future developments. LNRS are also a key deliverable of the 2021 Environment Act, and nature corridors will be critical resilience features linking sites enabling species mobility.

Ecological networks (again linked to Lawton review and general ecological principles) are wider networks beyond local green spaces whereby populations of plants and particularly animals are reliant on the ability to move beyond and between spaces to ensure their survival. (Or as cited by Lawton- 'suites of high quality wildlife sites containing biological diversity with connections between them. When species and their populations are restricted to remnant habitat patches or surrounded by inhospitable environments they are prevented from moving and spreading, reducing their ability to survive hazardous events or diseases. Survival of these populations is dependent on ecological corridors which allow for interconnectivity of wildlife populations which are often obstructed by human development.

The above comments also relate to Policy N1, Infrastructure 4, page 199

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

(Continue on a separate sheet if necessary)

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No

Yes

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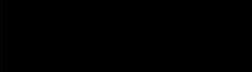
(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

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For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	27 June 2025
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Notes to accompany the Representation Form

1. Introduction

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- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

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4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

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Responder 598

Date: Fri, 27 Jun 2025 14:57:17 +0000

From: alicia pivaro

To: PlanningPolicy

Subject: Local Camden Plan response

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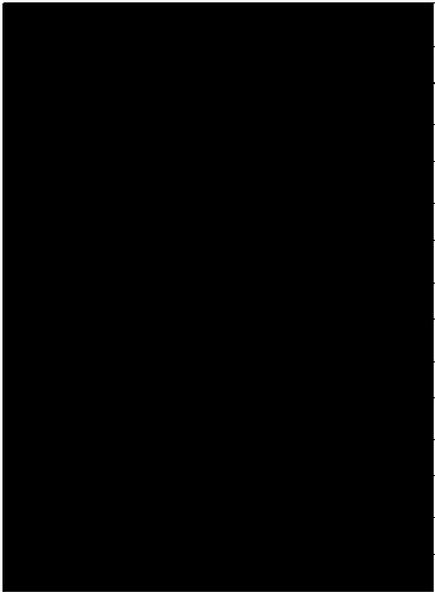
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Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Alicia"/>	<input type="text"/>
Last Name	<input type="text" value="Pivaro"/>	<input type="text"/>
Job Title (where relevant)		<input type="text"/>
Organisation (where relevant)		<input type="text"/>
Address Line 1*		<input type="text"/>
Address Line 2		<input type="text"/>
Post Town*		<input type="text"/>
Post Code*		<input type="text"/>
Telephone Number		<input type="text"/>
E-mail Address		<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation: Highgate Neighbourhood Forum

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Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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No

Yes

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The Highgate Neighbourhood Forum and the Neighbourhood Plan represent a community-led, democratically endorsed vision for the area. We are another important civic organisation in the area, alongside a number of others, that provide an open, free space for all residents and those working in the area to engage with local issues via our newsletter or via our various initiatives.

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11. Signature:	Alicia Pivaro	Date:	27/6/25
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Highgate Neighbourhood Forum

While we welcome this Local Plan and appreciate the work that has been done on it, we would like to draw your attention to one issue that has been overlooked. Our neighbourhood, Highgate is under the governance of both Camden and Haringey. The maps in this plan, show only that part of Highgate which is under Camden, and thereby considerably reduces its significance as a neighbourhood. It is our impression that we are marginalised by both and never considered holistically. We should like the plan to specifically promote working with neighbouring boroughs and, in the case of Highgate, promote working closely with Haringey. We suspect Kilburn, and its High street, suffer similar problems.

We would like to comment on three specific sections of the proposed Plan.

Chapter 11

NE1 the Natural Environment

While light pollution is mentioned, there does not appear to be any specific policy to counter it. Light pollution includes street lights, sports ground lights, security lighting and the spillage from windows, roof lights and glazed spaces such as extensions associated with housing. We are aware of the detrimental effects on nightlife, including problems for bats and the obscuring of the night sky.

11.17

The sides of railways, sheds and sidings, can also be a haven for wildlife. Camden should include TfL as one of the partners to work with, and the overground rail network should be included in the ecological network. Although it is mentioned in the SINC appendix, it is not specified in the main plan.

The view of St Pauls from Waterlow Park should be protected as should the view over London from Hillway

11.25

There should be a green corridor from Hampstead Heath across to Highgate Cemetery and Waterlow Park.

An area like the Holly Lodge Estate, with its large gardens and a green spaces, should have its own ecological designation as should areas like the former Highgate Common. Pond Square, The Reservoir, the copse attached to 46 Highgate West Hill and the open spaces attached to the houses in The Grove and South Grove, are all that is left of the common, enclosed 200 years ago. To have an ecological designation would help enhance what remains.

NE2 Nature Recovery Network Biodiversity

We recognise the limitations of the Environment Act when it comes to householder applications and small developments. We would like the Plan to promote the development of tactics of persuasion for these excluded groups, to encourage them to follow the principles of the Camden Plan. Such tactics could include publicity, education, and incentives, and examples, eg in Camden's own parks.

The Plan does not recognise the cumulative effect of many smaller developments; for instance the rear extensions or the felling of trees and shrubs, in neighbouring houses. Policies should be developed to address this problem.

Chapter 6 Camden North

Allocation sites design principles do not conform to NE1 and NE2. There is nothing about ecological and biodiversity targets.

Although Highgate is presumably a Neighbourhood Centre, there is no detail about how this area, which is struggling as a shopping centre, is to be supported. The boundary with Haringey runs along the middle of the High Street which makes any problem more intractable. Camden should work with Haringey to improve economic activity along the shared High Street.

Highgate is a small village with two huge private schools and two primary schools educating around 4,000 children. Many of these pupils arrive by car, increasing congestion problems both morning and afternoon. The traffic jams clog up Highgate Hill, Highgate West Hill and Hampstead Lane. While the problems Hampstead has with school traffic are referred to, similar problems in Highgate are ignored. Again, this is a problem that can only be addressed by working with Haringey.

We trust you find these comments helpful

Louise Lewis

For Highgate Neighbourhood Forum

Responder 599

Date: Fri, 27 Jun 2025 14:57:18 +0000
From: Ann Sweeney
To: PlanningPolicy
Subject: Representation Form

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Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Sean"/>	<input type="text"/>
Last Name	<input type="text" value="Meckin"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
Organisation	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation: **Seacon Limited**

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – Draft new Local Plan - Camden Council
- Draft Policy Map - Draft new Local Plan - Camden Council

Paragraphs	C3, C4, D, E3, 12.131, 12.141, 12.142, 12.143, 12.144, 12.145	Policy	D6 Basements	Policies Map	
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4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="checkbox"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="checkbox"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

I am writing to state my support for the representation submitted by the Association of Specialist Underpinning Contractors (ASUC) - *ASUC Representation on Camden Local Plan Proposed Submission Draft - 27 June 2025*

I agree with the objections made and the support given in the ASUC representation regarding Policy D6 Basements

I ask that the ASUC representation is given full weight, bearing in mind the negative impact on employment for my business and other businesses, and therefore on the broader economy.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

I support the modifications to Policy D6 Basements proposed in the ASUC Representation.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following?
Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	26th June 2025
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Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the Planning and Compulsory Purchase Act 2004 (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the Local Development Documents (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's Statement of Community Involvement (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012 (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a Sustainability Appraisal Report when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- **Justified**

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- **Effective**

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- **Consistent with national policy**

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Responder 600

Date: Fri, 27 Jun 2025 15:59:51 +0100

From: Michelle Hanlon

To: [redacted]

Subject: Camden's proposals to locate a Gypsy and Traveller Site in the space next to Constable House at the bottom of Eton College Road

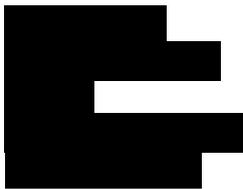
While I support Camden's efforts to provide space for this disadvantaged community, the selection of this site is wrong for a number of reasons.

- It is in an already crowded area next to [redacted] and would be overlooked by buildings of more than [redacted address] and the new development (currently under construction) next to Chalk Farm tube station.
- It is very small site (and actually smaller than the minimum size recommended).
- It is next to a main road, busy junction, a railway and an ambulance run - making it an unpleasant location for new dwellings.
- It will be highly impacted by the HS2 works for the next decade and add extra traffic to the area during the works for this.
- It's an area of high footfall; everyone walking from Chalk Farm station to Primrose Hill across the bridge will walk past it, and it will be highly visible and lacks privacy.
- It will mean loss of green space and a playground for the residents of Constable House who seem to know nothing about the plan.
- It will have a knock-on impact to the local community, residents on Eton College road and surrounds and Primrose Hill, including the policing of these areas.
- impact of provision of services from local schools and medical practices as well as other council services

Please acknowledge receipt of my objection to planning.

Sincerely

Michelle Hanlon

A large black rectangular redaction box covering the signature area.

Date: Fri, 27 Jun 2025 15:07:19 +0000
From: Claire Sturgess
To: PlanningPolicy
Subject: Regis Road Recycling Centre relocation

Dear Camden Council Regeneration and Planning Teams,

We have only just been made aware of the proposed relocation of the Regis Road Recycling Centre to an area that is directly adjacent to residential properties and a school.

We are fully supportive of recycling and want the recycling centre to remain in the area, but the proposed relocation will have a massively detrimental impact on our local community.

Bringing it into a residential area would bring constant noise, odour and heavy vehicle traffic into a quiet residential setting and significantly degrade quality of life for families, elderly residents, school children and many others.

Increased heavy vehicle traffic would pose a serious safety risk to young children commuting on foot, scooter, or bicycle. Our Camden community has worked hard to create a Healthy School Street environment, which has already brought measurable benefits in reducing traffic and pollution around these schools. This proposal would directly jeopardize those gains and place children at increased risk.

Property prices will plummet. And homes would be harder to sell.

Also, this consultation process appears to have been poorly communicated. Many of us were unaware of it. It's only because of a handful of eagle eyed neighbours that we've been galvanized into action.

Please, please can this proposal be paused so the community can work together to come up with alternatives.

A Recycling Centre is a necessary part of borough infrastructure — but its location should not come at the expense of children's safety, residents' well-being, and sound urban planning principles.

Claire Sturgess and Mark Nicholson

Responder 602

Date: Fri, 27 Jun 2025 15:08:44 +0000
From: Ian Henghes, Waterlow Park Trust
Advisory Group
To: PlanningPolicy
Subject: Representation for Camden Local Plan

Re: Consultation on draft Local Plan London Borough of Camden

26th June 2025

Dear Sir or Madam

Consolidating Local View Listings in the Camden Local Plan and Proposal for Waterlow Park–St Paul’s View

I am writing in response to the consultation on Camden’s new Local Plan to propose a more effective approach to the identification and protection of local views across the borough.

Consolidation of Local Views

At present, many valued local views are referenced only within Supplementary Planning Documents (SPDs) making them difficult to access and risking their being overlooked. The importance of clear, consolidated guidance for development and change within conservation areas is clear. Bringing together all locally designated views into a single, accessible document as part of a new Local Plan would align with this best practice, increase transparency, and ensure consistent protection and enhancement of Camden’s unique townscape and landscape assets.

Consultation with Conservation Area Advisory Committees

The value of local expertise and community input in shaping conservation policy cannot be overstated. I urge Camden to consult closely with Conservation Area Advisory Committees (CAACs) in preparing a consolidated list, to ensure it reflects local knowledge and community priorities and is comprehensive in scope.

Request to List the Waterlow Park–St Paul’s View

As Chair of the Waterlow Park Trust Advisory Group I specifically request the formal inclusion of the view from Waterlow Park towards London, notably the dome of St Paul’s Cathedral, as a locally designated view. The Highgate Conservation Area Appraisal recognises Waterlow Park as a significant open space with historic and panoramic connections to the City. The park’s southern slopes and terraces have long offered Londoners sweeping vistas, and the view to St Paul’s remains one of the most evocative and culturally resonant, linking Highgate’s heritage to the heart of the capital. The enduring presence of the sundial and plaque marking the park’s elevation—at the same height as the top of St Paul’s dome—underscores this historic relationship.

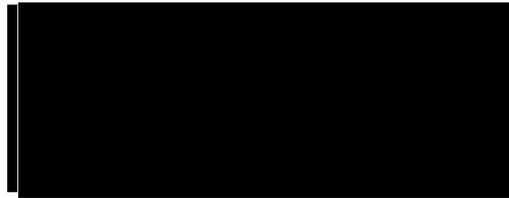
This request is supported by a letter we have submitted to the Greater London Authority seeking formal designation of the sightline in the new London Plan, as well as by a range of images and endorsements from local groups (see attached). The Waterlow Park–St Paul’s view is not only cherished by the community but is also integral to the area’s character as described in the Conservation Area Appraisal.

Conclusion

A single, consolidated document listing all local views—developed in consultation with CAACs and including the Waterlow Park–St Paul’s sightline—would greatly enhance Camden’s heritage and landscape policies. It would provide clarity for residents, planners, and developers, and ensure that Camden’s valued vistas are protected for future generations.

Thank you for considering this proposal and the request to list the view of St Paul’s from Waterlow Park.

Yours sincerely,



Ian Henghes



Attachments:

- The above letter in .pdf form
- Letter to GLA regarding Waterlow Park–St Paul’s view
- Supporting images
- Endorsements



Winter and summer view of St Paul’s from Waterlow Park.

Proposal to Designate a New Linear View of St Paul’s Cathedral from Waterlow Park.

We are writing as part of the consultation on the preparation of the new London Plan to urge the Greater London Authority to designate a new linear view of St Paul’s Cathedral from Waterlow Park. This proposal is strongly supported by local civic and amenity groups including The Highgate Society, Highgate Neighbourhood Forum, Highgate Conservation Area Advisory Committee, Waterlow Park Trust Advisory Group, Friends of Waterlow Park, the Lauderdale House Society, Highgate Cemetery, and many park users.

A Unique and Historically Resonant View

The view of St Paul’s Cathedral from Waterlow Park is unique among North London viewpoints. It is the only vantage point from this part of the city where the cathedral can still be seen in a relationship to its surroundings that echoes its historic prominence in the London skyline. Unlike other designated North London panoramas—such as Alexandra Palace, Kenwood, Parliament Hill, and Primrose Hill—where St Paul’s is either visually dominated by tall buildings (notably the Shard from Kenwood and Parliament Hill), lost among the cityscape (Primrose Hill), or too distant and obscured (Alexandra Palace), the Waterlow Park view preserves the cathedral’s visual primacy and clarity as the heart of the City of London.

This is not only a matter of visual aesthetics but of cultural and historical significance. The statue of Sir Sydney Waterlow, former Lord Mayor of London, stands in the park which he donated to the people of London gazing towards the cathedral, symbolically holding the key to the city. This underlines the enduring relationship between Highgate, Waterlow Park, and the civic identity of London as embodied by St Paul’s. When the Illustrated London News reported on the opening of the park in November 1889 the article included this passage *“The land slopes down from the top of Highgate-hill. From its turfy undulations one can look right over the top of the cross on St. Paul’s Cathedral, ... Halfway down the slope is an old sundial, overgrown with moss, on whose top is recorded the fact that this stone is on a level with the top of St. Paul’s.”* The sundial is still to be found in Waterlow Park and its inscription may be read by all.

Alignment with the London Plan’s Strategic Objectives

The London Plan (2021) recognises the importance of strategic and local views in shaping London’s identity and protecting its heritage assets. Policy HC3 (Strategic and Local Views) and the accompanying London View Management Framework (LVMF) set out the criteria for designating and managing such views, with a particular focus on the appreciation of Strategically-Important Landmarks like St Paul’s Cathedral. Table 7.1 of the Plan lists the currently designated strategic views, including several North London panoramas, but notably, there is no linear view of St Paul’s from North London.

The Plan also emphasises the need to conserve and enhance heritage assets and their settings, recognising their irreplaceable value to London’s character, economy, and quality of life (Policy HC1). The view from Waterlow Park aligns with these objectives by:

- Preserving a rare, clear, and historically meaningful view of St Paul’s Cathedral, free from the visual encroachment of modern tall buildings.
- Enhancing public appreciation and understanding of London’s heritage, in line with the Plan’s call to improve access to and interpretation of heritage assets.
- Supporting the integration of heritage in place-making and contributing to the social well-being and civic pride of Londoners.

Filling a Strategic Gap in the Current View Designations

The current suite of designated views does not include a linear view of St Paul's from North London. The existing panoramas either fail to provide a clear or contextually appropriate view of the cathedral or are compromised by recent developments. The Waterlow Park view is thus both distinctive and irreplaceable in its ability to tell the story of London's evolving skyline while maintaining the cathedral's intended prominence.

Since the view of St. Paul's is effectively framed by the tree cover of Waterlow Park, with little in the way of additional development visible between the cathedral and the park because of trees within the park, from the linear viewpoint it arguably gives visitors a better sense of how the view of the cathedral would have appeared to Londoners over the centuries before the expansion of the Metropolis.

The London Plan's policy framework explicitly allows for the review and addition of new designated views where justified (Policy HC3, para. 7.3.1). The Waterlow Park view meets the criteria for designation as it:

- Is experienced from a publicly accessible and well-used place;
- Offers a composition that contributes to the legibility and image of London at a strategic level;
- Provides an opportunity to see a key landmark—St Paul's Cathedral—in a way that is both historically resonant and visually compelling.

Broad Local Support and Community Value

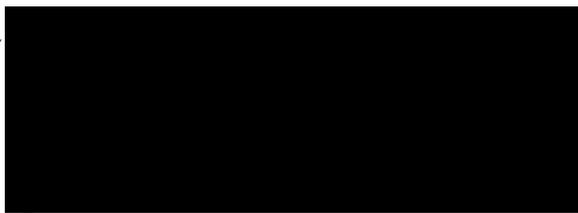
The proposal is backed by a wide range of local organisations and enjoys longstanding popular support among park visitors. This aligns with the London Plan's encouragement for boroughs to work with local communities and amenity societies in identifying and protecting views of local and strategic importance.

Conclusion

Designating a new linear view of St Paul's Cathedral from Waterlow Park would fill a notable gap in the current London View Management Framework. It would protect and celebrate a view that is unique in its clarity, historical resonance, and civic symbolism, and which is highly valued by local communities and visitors alike. This action would be entirely consistent with the London Plan's objectives to conserve heritage, enhance public appreciation of London's historic environment, and strengthen the city's sense of place.

We urge the Greater London Authority to include this new linear view in the next iteration of the London Plan.

Yours sincerely



Ian Henghes,



June 20th 2025

Release version pg. 2

Endorsements on the following pages of the proposal to designate a new linear view of St Paul's Cathedral from Waterlow Park.

The proposal is supported by:

The Waterlow Park Trust Advisory Group (the proposer - so no additional endorsement provided)

The Lauderdale House Society

Highgate Cemetery

The Friends of Waterlow Park

The Highgate Conservation Area Advisory Committee (HCAAC)

The Highgate Neighbourhood Forum (HNF)

The Highgate Society

Lauderdale House



21 June 2025

Ian Henghes, 



Dear Ian

I am pleased on behalf of Lauderdale House to offer our full support for TAG's application for the designation and inclusion of this view of St Paul's in the London Plan.

Lauderdale House is main historic house in Waterlow Park and is run by a charity which preserves this Grade II* listed building dating back to 1582 and brings it to life with arts and educational activities.

This view is important to us, as our approach to heritage interpretation uses the wider historic context of London – not only the stories of the great and good who have owned or passed through here but also its relationship with the City of London.

School children visiting are fascinated by the fact that people living here would have witnessed the devastation wrought by the Great Fire of London. The ability actually to see St Paul's, the original of which was destroyed in the fire, brings this to life and creates greater understanding for young and old in a way which would not be possible if it was not visible, or dwarfed by tall modern buildings.

Visualizing the impact of the bombs in World War II is similarly enhanced. A visit by the daughter of a parkkeeper who lived in flats in the house during the War talks about the impact of seeing what was happening in the city during the bombing. <https://www.youtube.com/watch?v=SCyyChi3HaY>

We sincerely hope that that TAG's application is successful and that this significant view into London's past is not lost or overwhelmed.

Yours sincerely



Katheirne Ives
Director

[Redacted]

Dear Ian

The view of St Pauls from Waterlow Park is not strictly speaking a matter for the Friends of Highgate Cemetery Trust.

However, we are keen to open up a view of St Paul's from the roof of our Terrace Catacombs, as this was an important view in the nineteenth century. Assuming that the view you wish to preserve will also preserve the view from Highgate Cemetery, then we would be in support of that.

With best wishes
Ian

[Redacted]

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Hi Ian

I attach a letter and supporting images which the 'view designation group' is proposing to submit to the GLA.

Is this something the Highgate Cemetery could endorse? If so could you send me an email confirming this? (The email will be converted to .pdf and sent as an annexe along with any further endorsements)

I would need your endorsement by the end of this week if you approve this application. Otherwise your name will be removed.

Thanks

. . .Ian

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Subject: Re: URGENT Re: St Paul's view designation – seeking your endorsement

From: Fiona Brown [REDACTED] >

Date: 16/06/2025, 14:01

To: Ian Henghes [REDACTED] >

Yes I confirm on behalf of the Friends that we support the application.

Fiona Murphy
Chair Friends of Waterlow Park

On 16 Jun 2025, at 13:35, Ian Henghes [REDACTED] wrote:

Hi Fiona

Can you confirm that the Friends are happy to endorse the application for designation of the view of St Paul's with the GLA on the London Plan?

ASAP please as now very urgent

Best

. . .lan

On 10/06/2025 18:17, Fiona Brown wrote:

Will do on Thursday

Fiona Brown MCIPR MCIM

On Tue, 10 Jun 2025 at 18:12, Ian Henghes [REDACTED] > wrote:

Hi Fiona

I attach a letter and supporting images which the 'view designation group' is proposing to submit to the GLA.

Is this something the Friends of Waterlow Park could endorse? If so could you send me an email confirming this? (The email will be converted to .pdf and sent as an annexe along with any further endorsements)

I would need your endorsement by the end of this week if you approve this application. Otherwise your name will be removed.

Thanks

. . .lan

Subject: Re: URGENT Re: Waterlow Park view of St Paul's and planning document consultations.
From: Therese Gray [REDACTED] >
Date: 16/06/2025, 14:48
To: Ian Henghes [REDACTED]

Hi,

In case Gail doesn't answer in time, we discussed this at an HCAAC meeting last week and the answer is yes.

We may be making some additional suggestions about views to be included ourselves, separately.

Therese

On 16 Jun 2025 13:39, Ian Henghes [REDACTED] wrote:

Hi Gail & co

I have not heard back re if you are able to endorse the application to the GLA to designate the view of St Paul's from Waterlow Park. If the HCAAC could do this that would be great. Other groups also very welcome to endorse of course!

This is now urgent as I have to send off Friday morning latest. This is to meet the deadline from the GLA for consultation on the draft plan. Obviously there will be further stages, but we need to be in there now.

Thanks

. . .lan

Subject: Re: URGENT: St Paul's view [REDACTED]

Date: 17/06/2025, 09:41

To: Ian Henghes [REDACTED] >

Dear Ian

Yes the HNF would be very happy to support.

Good luck!

Alicia xxxx

On 16 Jun 2025, at 13:43, Ian Henghes [REDACTED] > wrote:

Hi Alicia

I have to submit an application to designate the view by Friday at the absolute latest. Is the HNF able to endorse this? Please let me know ASAP.

Best

. . .lan

----- Forwarded Message -----

Subject: St Paul's view designation - seeking your endorsement

Date: Tue, 10 Jun 2025 18:08:18 +0100

Hi Alicia

I attach a letter and supporting images which the 'view designation group' is proposing to submit to the GLA.

Is this something the Highgate Neighbourhood Forum could endorse? If so could you send me an email confirming this? (The email will be converted to .pdf and sent as an annexe along with any further endorsements).

I would need this by the end of the week if you can do it.

Thanks

. . .lan

<Letter to GLA illustrations.pdf> <DRAFT2 letter to GLA re designation.pdf>

Subject: Re: Fwd: View designation – seeking your endorsement

From: "Chair, Highgate Society" [REDACTED] >

Date: 12/06/2025, 08:29

To: [REDACTED]
[REDACTED]

thanks - we are fine to endorse this Ian
Many thanks

Kind Regards

Andrew

Andrew Sulston

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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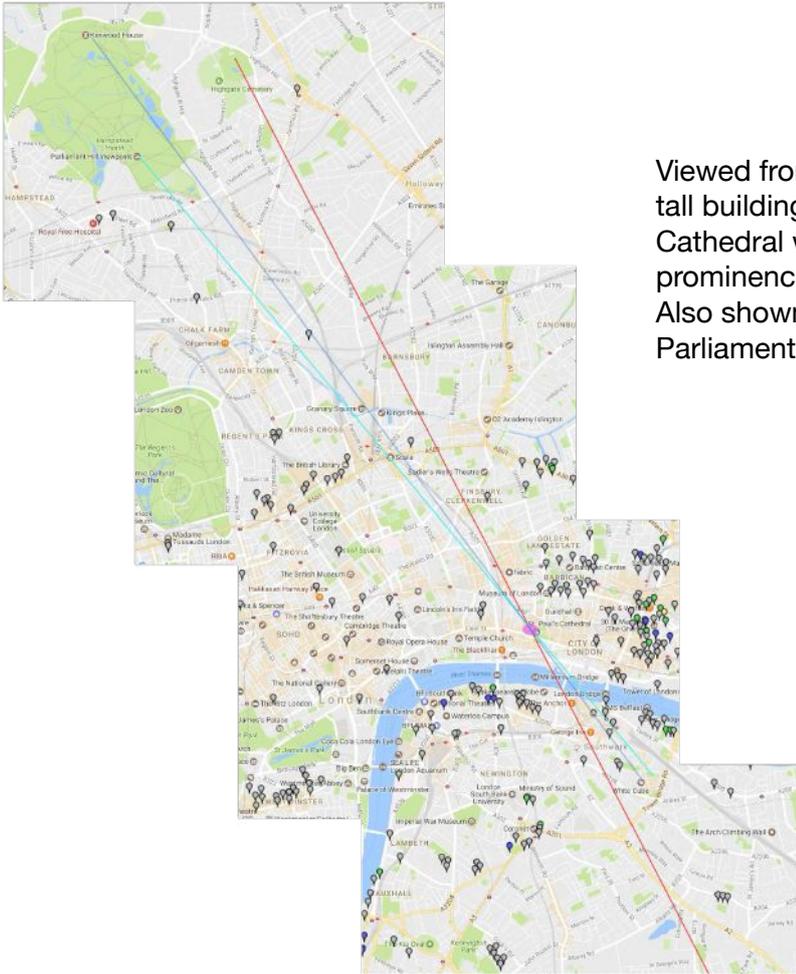
----- On Wed, 11 Jun 2025 09:29:41 +0100 [REDACTED] wrote

Andrew,

Yes, the "group" (all 3 of us) has met and discussed Ian's proposal. I am perfectly happy with it and see no reason why the Society can't endorse it.

M

Illustrations in support of application for the designation of the view of St Paul's from Waterlow Park



Viewed from Waterlow Park (red line) there are no tall buildings immediately behind St Paul's Cathedral which gives its dome a particular prominence as the cross touches the skyline. Also shown are sight-lines from Kenwood and Parliament Hill



St Paul's from Waterlow Park. June 2025



Roundel to mark the best viewpoint on the path near the sculpture of Sir Sydney Waterlow

"Brilliant to see St Paul's from this vantage point, nicely framed by the parks greenery"

"As a gardening volunteer, I meet many park users who visit our 'garden for the garden-less' - as Sir Sidney Waterlow designated it. One of the questions I frequently get asked is 'where is the famous viewpoint?'"

"To see St Paul's Cathedral in the distance framed by the trees of the park is very special."

Date: Fri, 27 Jun 2025 15:16:57 +0000
From: BRITT, Philip (NORTH LONDON NHS FOUNDATION TRUST)
To: PlanningPolicy
Subject: Camden local plan consultation

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Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Philip"/>	<input type="text"/>
Last Name	<input type="text" value="Britt"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name of organisation: North London NHS Foundation Trust
--

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.
Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph	<input type="text" value="Chapter 3, S8"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
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4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input checked="" type="text" value="x"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="text" value="x"/>	No	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text"/>
(4) Consistent with national policy	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

<p>Dear Sir/Madam</p> <p>I would like to make representations in support of the allocation of site S8 in the Camden plan, St Pancras Hospital. North London NHS FT are working in Partnership with King’s Cross Central Limited Partnership to plan and deliver the redevelopment of the St Pancras Hospital site.</p>
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The redevelopment of the St Pancras Hospital site will deliver benefits from the NHS perspective that are in line with local and national health strategies.

All NHS services currently on site have achievable and assured re-provision plans where appropriate. In addition to retaining outpatient mental health services on site, there will also be rehabilitation services (including 53 beds) delivered from the existing South Wing building that will be retained by the Trust for ongoing healthcare provision, allowing it to retain more services on site, while the remainder of the land will be redeveloped by KCCLP. The redevelopment of the site alongside Project Oriel, the new location for Moorfields Eye Hospital that is already under construction, will deliver wider benefits in the form of new housing, employment, and public amenities.

On the basis that the plan for S8 is in line with national policy and it is deliverable by NLFT and KCCLP within the timeframe of this plan, we determine that the proposed plan is sound.

We also welcome the engagement we have had with the council on the development of the plans for S8 and therefore also determine that the duty to co-operate on this part of the plan has been met.

We note that KCCLP have made their specific representations which we are supportive of.

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	X
(b) when the Inspector's Report is published	X
(c) when the Camden Local Plan is adopted	X

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	27 June 2025
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Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Responder 604

Date: Fri, 27 Jun 2025 15:16:55 +0000

From: Matt Lindon

To: PlanningPolicy

Subject: TfL Response to Camden Draft Local Plan - Regulation 19 Consultation

Dear Local Plan Team,

Thank you for consulting TfL. Please see attached our response to the Camden draft Local Plan (Regulation 19 consultation). We look forward to continuing to work with you as you progress your plan towards the EiP.

Kind Regards,

Matt Lindon

[redacted]
[redacted] [redacted postcode]

Email: [\[redacted email\]](#)



Planning Policy
Camden Town Hall
Judd Street
London
WC1H 8EQ

planningpolicy@camden.gov.uk

Transport for London
Spatial Planning



Dear Sir/Madam,

Re: Consultation on Camden draft local plan (Regulation 19)

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

Thank you for giving TfL the opportunity to comment on the Regulation 19 version of the Camden local plan.

The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

We therefore welcome policies, alongside the amendments made in response to our Regulation 18 comments, in the draft Local Plan as these support shifting journeys to sustainable modes and exceed London Plan requirements for car parking and cycle parking. We particularly commend the Council for continuing to have a requirement for car-free development across the borough which continues to set an example for other well-connected local planning authorities in London.

We welcome support for public transport and active travel improvements and requirements for developments to contribute to transport infrastructure where appropriate. The Sustainable Transport, Walking and Cycling London Plan Guidance, published in November 2022 provides additional detail on the preparation of development plans to be in line with Chapter 10 of the London Plan. For the benefit of clarity and to be consistent with the Sustainable Transport, Walking and Cycling London Plan guidance, we continue to encourage the Council to include a map of the planned and aspirational walking and cycling networks, as well as other transport improvements needed to support the plan.

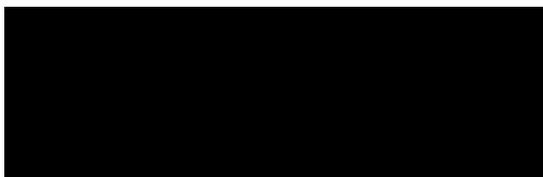
The Camden Town station capacity upgrade remains a project of strategic importance given it is an essential enabling component of a future Northern line upgrade, which would facilitate more than the current 24 trains per hour. We therefore encourage the Council to carefully consider how the policies and site allocations in the plan could make the most efficient use of land to help deliver this upgrade alongside step-free access.

We encourage the Council to make clear in the draft Plan where and how bus infrastructure, including priority measures, will be enhanced to support the efficient operation of the bus network and improved journey times. Relevant site allocations should be more specific with infrastructure requirements to protect access to the bus network and enhance infrastructure as part of development and design principles, linked to achieving sustainable mode share targets.

Furthermore, the council should make clear the process of Crossrail 2 safeguarding limits and outline how this might affect development of safeguarded sites within the relevant site allocations.

We have a number of detailed comments and suggestions for amendments on specific policies, area plans and site allocations. These are included in the table in appendix A, below.

Yours faithfully,



Josephine Vos | Manager



Appendix A: Detailed comments and suggestions for amendments

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
General comments & Crossrail 2		<p>We welcome the Council's commitment and support for improving walking, cycling and public transport across the borough throughout the sub-area policies. We would encourage further setting out objectives to enhance bus infrastructure and improve bus journey times through these policies, as well as to protect and improve bus infrastructure across the borough.</p> <p>The plan should also clearly show the extent of the Crossrail 2 safeguarding limits which extend across a significant portion of the borough.</p>		<p>Our comments made in response to the Regulation 18 consultation remain valid. We would like to reiterate our comments on setting out specific objectives to enhance bus infrastructure through policy. For relevant policies, we encourage the council to include maps outlining proposed walking and cycle routes for clarity. This includes Policy SI South Camden, Policy CI Central Camden, Policy WI West Camden, Policy T2 Prioritising Walking, Wheeling and Cycling.</p> <p>The Council should make the safeguarding limits, including sites of surface interest, clear within the relevant area policies of the draft Plan. We note that the safeguarding directions are now clearly stated in the relevant site allocations, except where stated below.</p> <p>Developments above running tunnels should carefully consider foundation design to ensure that there is a pile free corridor that will allow us to build Crossrail 2 tunnels in the future. Development designs should ensure that the building will not be compromised by the future tunnels and that any future occupiers will not experience noise and vibration from the future operation of Crossrail 2. In these circumstances, development can usually proceed but the developer will need to discharge our recommended Crossrail 2 conditions (if recommended) that ensure the foundation design meets these criteria.</p>
Policy SI South Camden	29-32	<p>Part S Infrastructure</p> <p>Part i – We welcome continued support for HS2 and station improvements at Euston. We would encourage the Council to include improvements to the bus station and a link between Euston and Euston Square London Underground stations as part of this priority.</p>	44-47	<p>While the Council may wish to address Crossrail 2 safeguarding through a separate policy which covers the whole borough, much of the Crossrail 2 safeguarding limits are located within the South Camden area. We would recommend Crossrail 2 safeguarding to be referenced in this policy.</p> <p>Part U Infrastructure</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>Part ii – We welcome support for the planned upgrade of Holborn station. Developments in the vicinity of the station should contribute towards its delivery through a S.106 contribution.</p> <p>We welcome the Council’s support for the removal of the King’s Cross gyratory in Part iii of the policy. The policy should also clearly set out the potential to implement 2-way running for buses along Pancras Way and Midland Road. As outlined in Appendix I, TfL will work with the Council to design street improvements for the removal of the King’s Cross gyratory. We also support proposals for improvements through the Holborn Liveable Neighbourhood scheme in part vii and further neighbourhood-based schemes in part viii. We support the delivery of a public realm which provides positive environment for people walking and cycling.</p> <p>Part iv – We support the plans to deliver improved pedestrian and cycle links, in line with Sustainable Transport, Walking and Cycling London Planning Guidance. We encourage the provision of a map of proposed walking and cycling routes and improvements to ensure they maximise the delivery of Healthy Streets and active travel guidance.</p> <p>Part ix – We anticipate a 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 recommend this is reflected in this policy.</p>		<p>Part I – We welcome the council’s continued support for HS2 and station improvements at Euston as detailed further in the new Policy S2 Euston area. For consistency with the Euston Area Plan and ongoing discussions with the DfT, the policy should make clear that improvements are needed for other transport infrastructure at Euston such as the Underground station and bus station. We recommend the following modifications to part I of the policy for effectiveness: ‘The delivery of a new High Speed 2 station and mainline station improvements at Euston, alongside improvements to other supporting public transport and active travel infrastructure serving the station.’</p> <p>Part 2 – For consistency with the proposals of the Euston Healthy Streets programme, we recommend the following edits for clarity: ‘The transformation of Euston Road in accordance with Euston Healthy Streets and the removal of the King’s Cross gyratory.’</p> <p>Part 9 – We welcome the amendments made to the policy to reflect the potential need to reinstate four tracks and a third platform on the North London line to meet future passenger and freight demand.</p> <p>The policy also has the opportunity to set out proposals more generally to improve bus infrastructure and journey times.</p>
Policy S2 Euston area	N/A	N/A	48-51	We welcome the new policy, particularly in emphasising the importance of delivering an improved and integrated transport

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
				interchange at Euston as well as seeking connectivity improvements within the area and to surrounding areas of the borough.
ALLOCATION S5 (Formerly S4) (CSP2) – 120-136 Camley Street	40-42	We support the requirements for improved public realm and connectivity along Camley Street. We would also encourage the site allocation to explicitly state how this would contribute to improved access to bus services on Agar Grove.	62-64	Part 11 – We welcome the amendments outlining the provision of a new public space that facilitates a coordinated route along the boundary with Agar Grove Estate, enhancing connectivity for pedestrians and cyclists along Camley Street. We note, however, that parts 11.a and 11.b of the policy appear to be duplicates. Part 12 – We welcome the addition that development will be expected to contribute towards improved access to bus services on Agar Grove.
ALLOCATION S6 (Formerly S5) (CSP3) – 104 – 114 Camley Street and Cedar Way Industrial Estate	42-44	We support the proposed improvements to the public realm along key routes. Given the site's relative isolation from the public transport network, development should also improve or contribute to improved access to the bus network. We note the requirement in Site Allocation S7 for development there to contribute towards a new canal crossing to improve connectivity between King's Cross, Camley Street and St. Pancras Way. This should be stated in this site allocation as well.	65-67	We note the new requirement in Site Allocation S5 for development to contribute towards improved access to bus services. As per our Reg. 18 comments, this should be extended to this site allocation as well. Part 18 – We welcome the requirement for development in this site allocation to contribute towards a new canal crossing to improve connectivity between King's Cross, Camley Street and St. Pancras Way.
ALLOCATION S12 (Formerly S13) (IDS16) - Belgrove House 13- 21 Euston Road	59-60	This site is within the limits of the Crossrail 2 Safeguarding Directions and is a site of surface interest insofar as it could be required for works at surface level. This should be clearly stated as part of the site allocation. While we did not object to the existing planning permission on the grounds that the site is outside the current scheme designs, any future planning applications should still be referred to TfL to confirm that this remains the case. We support the proposal for an integrated, step-free entrance to Kings Cross St. Pancras station to improve access for those who need a step-free route and improve the experience along Euston Road. Although implicit in the text, it should be clearly set out that this will be	80-81	We welcome the amendments made in line with our response to the Regulation 18 consultation, including that TfL is a key consultee for the site due to its status as a site of surface interest. Part 6 – The policy should make clear that an integrated, step-free entrance to Kings Cross St Pancras station should be delivered as works in kind and secured through an appropriate planning obligation.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		delivered as part of the development as works in kind and secured through an appropriate planning obligation.		
ALLOCATION S15 (Formerly S16) (IDS19) - Land to the rear of the British Library	65-67	<p>We note that the site allocation refers to the Crossrail 2 Safeguarding Directions which cover the site. The site is also an area of surface interest which will be necessary to construct the planned Euston St. Pancras station. Any development proposals for the site would need to demonstrate that:</p> <ul style="list-style-type: none"> • they will be compatible with the location of Crossrail 2 structures (tunnels, shafts and temporary works) proposed in the vicinity of the development, • accommodate any potential ground movement anticipated to arise from construction works and • mitigate against any potential effects of the operation of Crossrail 2. <p>We support the requirement for Crossrail 2 infrastructure to be incorporated into the design in a manner which responds positively to the public realm.</p> <p>As part of the extant planning permission for the site, a S.106 contribution of £150k has been secured towards a new Cycle Hire docking station in Ossulston Street. Any future proposals would also need to have a commensurate contribution secured towards a new Cycle Hire station.</p>	86-87	<p>Parts 8 & 9 – We welcome the amendments made to the policy, in line with our response to the Regulation 18 consultation.</p> <p>We would like to reiterate that any future proposals for this for the site would need to have a contribution secured towards a new Cycle Hire station commensurate with the scale of development. We recommend that this is clearly stated, as written in our regulation 18 comments, under 'infrastructure requirements' of the site allocation.</p>
ALLOCATION S17 (Formerly S18) (HCG3) - Selkirk House, 166 High Holborn, I	70-72	The development and design principles should make clear that no car parking should be retained, in line with London Plan and Camden policy and given the proximity of the site to Holborn and Tottenham Court Road stations.	90-92	Part 5 – We welcome the clarification that development must remove existing on-site car parking, in line with the London Plan Policy T6 and the Council's car free approach set out in the Local Plan Policy T5.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street		We welcome the requirement to contribute to public realm improvements planned for the area through the Holborn Liveable Neighbourhood project. We particularly support designs which enhance permeability through the site to create new pedestrian and cycle routes which complement the Liveable Neighbourhood scheme.		
Policy CI Central Camden	81-83	<p>Part O – Infrastructure</p> <p>We welcome the inclusion of step-free access at Kentish Town and Camden Town stations. Part i of the policy should be amended to also include Chalk Farm station.</p> <p>We are concerned however that the Council does not include the proposed Camden Town station capacity upgrade in the policy given the acute capacity constraints which exist at Camden Town station. Table 10.1 of the London Plan sets out our infrastructure priorities for delivering the London Plan, including London Underground step-free stations, station capacity upgrades and line upgrades. In addition to the capacity pressures at Camden Town station, the station upgrade is an essential enabling component of a future Northern line upgrade which would allow more than the current 24 trains per hour. As such, this station upgrade is of strategic importance, not just for Camden, but London more widely.</p> <p>Although we continue to make the case for capital funding which could deliver this much needed upgrade, S.106 contributions, CIL and, where appropriate, works-in-kind from development in the surrounding area will be essential to enabling the station upgrade.</p>	106-109	<p>Part O – Infrastructure</p> <p>Part 1 – We welcome the amendments made to include Chalk Farm station as a priority for step-free access. It should be noted however that further investigation internally has found that it will be exceptionally challenging to deliver step-free access at this station. While there may still be an opportunity to do so, it will be dependent on providing access from Site Allocation C8 Former Morrisons petrol filling station.</p> <p>Part 2 – We welcome the amendments made to include capacity upgrades at Camden Town Underground station in light of existing capacity constraints.</p> <p>Part 3 – We welcome the amendments made to the policy to reflect the potential need to reinstate four tracks and a third platform on the North London line to meet future passenger and freight demand.</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>As stated above, we anticipate a 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 recommend this is also reflected in this policy.</p> <p>We support the creation of spaces safe and attractive for pedestrians and bicycle users, as in line with Healthy Streets T2 London Plan Policy and Sustainable Transport, Walking and Cycling LPG. It should be ensured that development proposals improve permeability, and a map showing proposed walking and cycling routes would be beneficial.</p>		
ALLOCATION C2 (KT2) – Regis Road and Holmes Road depot	86-89	<p>As noted in the site allocation, improvements to walking and cycling routes to and through the site will be critical to the delivery of Good Growth on this site. TfL supports proposals to enhance permeability and walking and cycling routes to provide an environment which enhances the public realm and delivers a positive environment for active travel. Additionally, we support the diversification of railway arch uses while enhancing the local public realm. Opportunities to increase permeability across the railway through the arches should also be explored, as noted in part p of the policy.</p> <p>We welcome the requirement for development proposals to contribute towards improvements of Kentish Town and Gospel Oak stations. We would encourage the allocation to also clearly refer to potential capacity upgrades at Kentish Town station. Funding for feasibility work may also be required.</p>	112-116	We welcome the further requirement to explore north-south permeability across the railway.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
ALLOCATION C3 (KT3) – Murphy Site	90-92	<p>The railways and lack of permeability across the site present a significant challenge towards supporting travel by walking, cycling and public transport. Therefore, we strongly support all plans to deliver improved walking and cycling routes across the site and connecting to neighbouring sites.</p> <p>As with site C2 above, we welcome the requirement for development proposals to contribute towards improvements of Kentish Town and Gospel Oak stations. Funding for feasibility work may also be required in the case of Gospel Oak station.</p>	117-120	Our comments made in response to the Regulation 18 consultation remain valid. The site allocation should clearly set out in that funding for a feasibility study may be required for improvements to Gospel Oak station.
ALLOCATION C5 (KT5) – 369 – 377 Kentish Town Road	95-96	We support widening of the pavement in this location, however any relocation of the existing bus shelter (Stop KF) would require consultation with TfL to confirm an appropriate new location which may prove challenging due to the road layout to the south of the site. A relocated bus shelter should also include real time passenger information.	123-124	Part 6 – Our comments made in response to the Regulation 18 consultation remain valid. We recommend the following edits for clarity: ‘contribute towards the relocation and enhancement of the bus shelter, in collaboration with Transport for London , to improve passenger and pedestrian safety, consistent with aspirations for a new Kentish Town Square. Any relocated bus shelter should include real time passenger information. ’
ALLOCATION C7 (CGY2) – Morrisons supermarket	99-101	<p>We strongly support the removal of existing car parking on the site, in line with London Plan and draft Camden Local Plan policies. Access to the bus network should be included as part of the development and design principles, linked to achieving sustainable mode share targets.</p> <p>While the infrastructure requirements reference aiming to ‘minimise the environmental impacts of bus movements’, the bus stops, stands and routing into the site provides critical access and operational capacity to passengers and this should be recognised in the policy text. Indeed, the extant planning permission for the site provides for replacement bus stops and standing facilities. In addition to ‘ensuring that accessibility to bus services is</p>	127-130	<p>Our comments made in response to the Regulation 18 consultation remain valid.</p> <p>Part 13 – We do not support permanent off-site bus standing facilities due to the increased operational costs that will be difficult to recover in the long-term, we therefore recommend the following modifications to the policy: ‘including the practicality of alternative locations outside the site. Permanent bus standing facilities should be provided on-site, and any off-site provision should be temporary and for the duration of the works. Details of bus standing facilities are subject to agreement with TfL.’</p> <p>Furthermore, the policy should state ‘Development must contribute to any additional costs associated with rerouting of</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		maintained', protecting bus operation, minimising bus delays and improving access to the bus network should also be included. This is important for current and future residents, employees and shoppers; particularly those with limited mobility. The note should also include the requirement to provide a safe and comfortable waiting environment for bus passengers.		<u>additional bus services to serve the development or alternative bus standing locations.'</u>
ALLOCATION C10 (CGY5) – Juniper Crescent	106-108	<p>We welcome the requirement for any development proposals to rationalise car parking on-site and that it is designed to allow for repurposing when no longer required. It should be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.</p> <p>Proposals should have regard to the location of bus stops and stands as necessary. We note that the extant planning permission for the Morrisons site includes proposed reprovision of bus stops and stands adjacent to this site.</p>	137-139	We note that the part II of policy does require car parking to 'be designed to allow for repurposing when no longer required'. We recommend the policy is modified as follows for clarity: '...be designed to allow for repurposing when no longer required <u>existing residents move out or permits are given up</u> ; and'
ALLOCATION C11 (CGY6) – Network Rail land at Juniper Crescent	109-110	The infrastructure requirements of this site suggest that a new bus turning area should be considered in place of the planned arrangement at the Morrisons site. This would have to be in conjunction with the reprovision of stand spaces for five buses with independent bus movements and new bus stops for resident access, along with TfL-specified welfare facilities for bus drivers. Extending bus routes to a new terminus would incur ongoing operational cost which would need to have a viable business plan and be financially sustainable and would require a S.106 contribution.	140-142	<p>We would like to reiterate our previous comments that a new bus turning area is likely to come with constraints that would need careful planning in collaboration with Transport for London to ensure the changes do not have negative impacts. We recommend this is reflected in the site allocation.</p> <p>We suggest the following edits to part 8 of the policy: 'An operational area within the site could, for example, support a bus turning area at the end of the existing access road <u>in conjunction with the reprovision of stand spaces for five buses with independent bus movements, new bus stops for resident access, and TfL-specified welfare facilities for bus drivers.</u>'</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
ALLOCATION CI2 (CGY7) – Gilbeys Yard	111-113	We welcome the requirement for any development proposals to rationalise car parking on-site. It should be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.	143-146	Part 9 of the policy should be modified to state, ‘rationalise parking on-site in line with Policy T5 (Parking and Car Free Development), be designed to allow for repurposing when existing residents move out or permits are given up and reduce vehicular dominance;’ to ensure the development complies with London Plan car parking standards in future.
ALLOCATION CI3 (IDS13) – West Kentish Town Estate	114-116	The site allocation should include a clear requirement for any development proposals to rationalise car parking on-site. It should also be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.	147-149	We welcome the addition of part 8 of the policy, however it should be modified to state, ‘where existing residents parking is reprovided, this should be located to minimised car movements within the site; and be designed to allow for repurposing when no longer required existing residents move out or permits are given up. ’
ALLOCATION CI5 (Formerly CI4) (IDS11) – Wendling Estate and St Stephens Close	117-119	The site allocation should include a clear requirement for any development proposals to rationalise car parking on-site. It should also be clearly stated that this should be as existing permits expire or existing residents move out with an overarching aim to eventually be car free. This should be accompanied by a Parking Design and Management Plan.	152-154	We welcome the addition of part 6 of the policy, however it should be modified to state, “where existing residents parking is reprovided, this should be located to minimised car movements within the site; and be designed to allow for repurposing when no longer required existing residents move out or permits are given up. ”
ALLOCATION CI7 (Formerly CI6) (IDS6) - Camden Town over station development	122-124	In line with our comments on Policy CI Central Camden, we encourage the Council to consider how to make most efficient use of land as part of this site to help deliver the Camden Town station capacity upgrade and step-free access. While a development on this site will be unlikely to deliver the station upgrade on its own, any development coming forward on this site should contribute towards the delivery of this scheme and development on this site may need to deliver works in kind for a new ticket hall and station box insofar as ensuring the full station upgrade can be delivered as and when funding is available. Any	157-160	Our comments made in response to the Regulation 18 consultation remain valid.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>development on this site should additionally not preclude the delivery of the station capacity upgrade.</p> <p>Developments in the surrounding area should also provide a financial contribution towards the delivery of the station upgrade. While we acknowledge the desire to provide step-free access and capacity improvements to Kentish Town and Chalk Farm stations, we encourage the Council to prioritise Camden Town station for developer contributions.</p>		
Policy WI West Camden	133-135	<p>Part L – We welcome that a new link and step-free access into West Hampstead and/or Finchley Road Underground stations are considered a key priority for the Council and note that progress towards enabling this is already underway. We would encourage the Council to clearly state that such improvements would also improve capacity at those stations. We also welcome support for the creation of walking and cycling routes which are set out in the Camden Transport Strategy (CTS). It would however be useful to include a map of these routes as part of the policy and supporting text itself. While we support the Council’s desire to improve the public realm around the West Hampstead stations and along the A41 Finchley Road among other areas, consideration should be given to improving the interchange experience, including with buses, and resulting pedestrian desire lines between the stations.</p>	172-173	<p>Part L Infrastructure</p> <p>Part I – We welcome the modifications to highlight capacity improvements to the stations.</p> <p>Part 5 – We strongly welcome the additional priority for improving the interchange experience both between the three West Hampstead stations and in relation to the surrounding bus, pedestrian and cycle network.</p>
ALLOCATION W2 (WH12) - O2 Centre, car park, car showrooms and 14 Blackburn Road	137-139	<p>We support the infrastructure requirements included for this site allocation which gives strong consideration for all active, efficient and sustainable modes. However, part n of the policy should also require incorporating bus standing and driver facilities to TfL standards. We particularly welcome part t of the policy which requires the development to contribute towards bus priority and</p>	176-178	<p>Part 16 – We welcome the requirement for development to be supported by a bus infrastructure plan to deliver improvements to bus stop facilities both with, and in the vicinity of, the site.</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		cycle infrastructure along West End Lane and Finchley Road, which are key public transport and active travel corridors.		
Policy NI North Camden	153-154	Part F – We support the prioritisation of area-based schemes to improve conditions for walking and cycling through traffic reduction as well as extensions to the cycle network. For consistency and to aid in the effectiveness of the policy, part i and part ii should cross-reference the Camden Transport Strategy and Cycling Action Plan. As with other relevant policies, it would be clearer to include a map of the proposed walking and cycling networks.	198-199	Part F – We welcome the cross referencing of the Camden Transport Strategy and Cycling Action Plan within the policy.
ALLOCATION N4 (IDS20L) - Hampstead Delivery Office	160	We note that this site allocation is intended to apply should the delivery office become surplus to Royal Mail requirements. Given this site allocation is in a PTAL 4 location we would expect one of the development requirements to specify that there should not be any car parking reprovided. Should the site be intensified with a delivery office remaining with other uses above, only Royal Mail operational parking would be acceptable.	205-206	To ensure the Site Allocation complies with London Plan Policy T6, an additional part 4 of the policy should be added: <u>‘Development must be car free, except for Royal Mail operational parking.’</u>
Policy H9 Purpose built student accommodation	209-216	<p>Part B vii – We welcome the requirement that development will be accessible to public transport and will not have a detrimental impact on the transport network. We suggest also expecting development to be located in proximity to the cycleway network given students’ propensity to cycle which should be fostered through policy.</p> <p>Para. 7.227 – We welcome the statement that ‘Public transport and other services that will support new student housing should have existing or committed capacity to accommodate the demand generated by the development.’ However, we recommend that the final sentence is clarified by stating that <u>‘Funding A</u></p>	275-284	<p>Our comments made in response to the Regulation 18 consultation remain valid.</p> <p>For clarity, para. 7.299 should be modified to state, <u>‘Funding A 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.’</u></p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<u>contribution towards public transport and other services</u> may be sought through planning obligations as appropriate <u>where there is deemed to be insufficient capacity or connectivity.</u>		
Policy D6 – Basements	342–343	We note that the policy requires developments to demonstrate that any basement development would not cause harm to neighbouring properties. This should also include London Underground infrastructure.	476–483	Our comments made in response to the Regulation 18 consultation remain valid.
Policy TI Safe, Healthy and Sustainable Transport	374–375	We broadly support the approach to transport set out in this policy which is in close alignment with the London Plan. As part of the policy, we recommend that reference is made to supporting the Mayor’s target for 80 per cent of all journeys to be made by active, efficient and sustainable modes through including the borough’s LIP target of 93 per cent of all journeys in Camden to be made by sustainable modes by 2041. We also recommend including support for the Mayor’s Vision Zero target.	516–519	Paragraph 14.4 – We welcome the references made to the Mayor’s Vision Zero strategy and Healthy Streets Approach, alongside the council’s LIP target of 93 per cent of all journeys in Camden to be made by sustainable modes by 2041.
Policy T2 Prioritising walking, wheeling and cycling	376–378	We welcome the measures in this policy which are in alignment with the London Plan and the Sustainable Transport, Walking and Cycling LPG. We recommend including the maps of the planned walk and cycle networks as part of the supporting text.	520–523	The comments made in our response to the Regulation 18 consultation remain valid.
Policy T3 Public Transport	378–379	Part A – We welcome this statement although we recommend that bus stands and drivers facilities are added to the list of infrastructure so that it reads as follows: ‘To safeguard and promote the provision of public transport in the borough the Council will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, <u>bus stands, drivers’ facilities, real time passenger information</u> , signage, and timetable information.’	524–526	We note that Part A of the policy has been modified to state ‘bus infrastructure’ in lieu of listing relevant bus infrastructure. It would aid the effectiveness and clarity of the policy to reinstate the list, including the proposed additions in our response to the Regulation 18 consultation as part of the supporting text. Paragraph 14.30 – We strongly welcome the addition that passenger transport interchange facilities should be designed and delivered in accordance with Transport for London’s Interchange Best Practice Guidelines.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>Part B – We welcome confirmation that ‘Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments and the provision of improved public transport infrastructure including bus shelters and passenger information, and step free access at stations in the borough.’ We additionally welcome the explicit reference to securing contributions towards providing step-free access at stations in the borough.</p> <p>Part C – We welcome the requirement for developments, as appropriate, to facilitate and improve interchange opportunities. The policy or supporting text could additionally refer to TfL’s Interchange Best Practice Guidelines, available at: https://content.tfl.gov.uk/interchange-best-practice-guidance-2021.pdf</p>		
Policy T4 Shared Transport Infrastructure and Services	379-381	<p>Part A – We broadly welcome the approach to shared transport infrastructure and services including the commitment in part i. to ‘work with Transport for London to expand and improve the Santander cycle hire docking station network in the borough.’ However, caution may be required with part vi. ‘work with car club operators to expand and improve the network of car club bays in the borough, including the provision of electric car club vehicles where possible.’ Given the requirement for car free development, 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</p>	527-529	<p>Our comments made in response to the Regulation 18 consultation remain valid. While car clubs are potentially able to reduce car use and ownership in areas which currently have high rates of car ownership (when paired with a reduction in general car parking), the opposite is potentially true in areas which have low rates of car ownership. This could ultimately have the opposite of the desired effect to restrain car use in parts of Camden, particularly should car clubs become readily available on demand.</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>generally, and less so in well-connected locations with a choice of active travel and public transport alternatives because of the potential risk of encouraging car use which would otherwise might not happen.</p> <p>We would be interested to see the methodology and outputs of the Shared Transport Access Level in Camden (STALC) work which is referenced in the supporting text.</p>		
Policy T5 Parking and Car Free Development	381-383	<p>Part A – We strongly support the policy that ‘The Council will limit the availability of parking and require all new developments in the borough to be car-free.’ It is important for any car club provision to be consistent with this, for example, if car clubs were provided in locations where the overall supply of parking is reduced, this could be in line with the spirit of reduced car ownership and vehicle dominance.</p> <p>Part iic – As noted under T4, 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.</p> <p>Part v – We strongly support the redevelopment of existing car parks for alternative uses. This should be expanded to include redevelopment of vehicle storage areas such as garages above and below ground and the repurposing of individual car parking spaces both on and off street, including the removal of redundant crossovers.</p> <p>Part vi – The wording should be clarified as follows: ‘where residential estates are redeveloped, reduce on-</p>	530-532	<p>Part A – We welcome the amendments made in line with our response to the Regulation 18 consultation.</p> <p>Part 6 – As per our Regulation 18 comments, we would like to reiterate that the wording of the policy should be clarified as follows: ‘where residential estates are redeveloped, reduce on-site parking, as far as possible, with a plan for the redeveloped site to eventually be car free as part of re-development schemes.’ The London Plan is clear that where sites are redeveloped the most up to date parking standards should be applied. 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. The amended wording would be consistent with paragraph 14.48.</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>site parking, as far as possible, <u>with a plan for the redeveloped site to eventually be car free as part of re-development schemes.</u> The London Plan is clear that where sites are redeveloped the latest parking standards should be applied. 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. The amended wording would be consistent with para. 14.33.</p> <p>Para. 14.30 – We welcome clarification that ‘Staff parking is not considered essential and will not be permitted.’</p>		
Policy T6 Sustainable Movement of Goods, Services and Materials	383– 386	<p>Part A – We support an approach that encourages movement by bicycle, canal and rail where possible, including provision for cargo bikes. In 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 the street thereby contributing to congestion.</p> <p>We welcome the requirement in part ii for cargo cycle parking in major developments, although this should be in addition to wide-spaced Sheffield stands for non-standard cycles expected in new developments. We also welcome the requirement in part iii for contributions towards new and improved cycle infrastructure for logistics developments resulting in additional cargo cycle movements, including exploration of the provision of loading and short-term parking spaces for cargo cycles to facilitate their use in a way that is safe and non-disruptive for others, in particular people walking and using buses.</p>	533– 538	<p>Part A.5 – We welcome the amendments made to the priority order in line with our response to the Regulation 18 consultation.</p> <p>Part B.3 – The comments made in our response to the regulation 18 consultation remain valid. We would like to reiterate our point on the consistent use of the terms Construction Logistic Plans and Delivery Servicing Plans throughout the Local Plan to provide better clarity for readers. This is in accordance with the London Plan and TfL Guidance.</p> <p>Paragraph 14.58 – We welcome the clarification that any cycle infrastructure to support cargo bike usage should be provided in addition to wide-spaced Sheffield stands for non-standard cycles.</p>

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>In part vii. Care should be taken in the location and design of micro mobility hubs and urban logistics hubs so that they do not attract vehicles into areas designed primarily for walking and cycling. We therefore welcome the statement in 14.49 that 'The Council will seek to secure contributions towards the provision of freight consolidation hubs and micro mobility hubs where such provision would result in reduced vehicle trips and impacts on the environment.'</p> <p>Part B – We recommend the consistent use of the terms Construction Logistics Plans and Delivery and Servicing Plans throughout the Local Plan in accordance with the London Plan and TfL guidance.</p>		
Policy DMI Delivery and Monitoring		<p>Part A.vi – We welcome the commitment to 'using CIL, planning contributions and legal agreements where appropriate to:</p> <ul style="list-style-type: none"> a. support healthy and sustainable development b. secure the infrastructure, facilities and services to meet the needs generated by development c. mitigate the impact of development' <p>Para. 15.20 – The list of matters that are likely to be addressed through planning obligations should include 'public transport and active travel improvements' to ensure consistency with Local Plan policies T2 and T3 and London Plan policy DFI D which states that in setting policies seeking planning obligations priority should be given to affordable housing and necessary public transport improvements. This is important because some transport improvements such as contributions towards bus capacity or step free access cannot easily be addressed through CIL and should be explicitly identified in the list of planning obligation matters.</p>	540-546	We welcome the amendments made in line with our response to the regulation 18 consultation.

Policy	Page	Reg. 18 comments	Page	Reg. 19 comments
		<p>Para – 15.23 We welcome the statement that ‘Pooled contributions will be used when the combined impact of development in an area creates the need for related infrastructure or works that will not be funded by CIL.’</p> <p>This is particularly relevant to transport improvements such as step-free access, bus capacity or Healthy Streets improvements.</p>		

Date: Fri, 27 Jun 2025 15:19:32 +0000

From: Fleur Durrant

To: planningpolicy@camden.gov.uk, [REDACTED]

Subject: Objection to Site Allocation C27 (Gypsy And Traveller Site)

Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)

My name is Fleur Durrant and [REDACTED].

I want to object to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

1. Loss of Valued Community Amenity Space

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. It is currently managed as part of the "Communi-trees" community greening

initiative. While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private

outdoor areas. Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents. The loss would be contrary to:

- NPPF Paragraphs 99-101 (protection of open space);
- London Plan Policy S4 (ensuring sufficient play and informal recreation);
- Camden Local Plan Policy A2(e);
- Case law (e.g. *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548) confirming informal community land requires robust justification prior to redevelopment.

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton

Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants. This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) - sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
- Article 8, European Convention on Human Rights (right to respect for private and family life);
- Moore v SCLG [2013] EWCA Civ 1194 - established that mutual amenity impacts must be weighed in Traveller site cases.

3. Flood Risk - Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden's 2021 surface water flood data as subject to risk. Traveller pitches are considered a "Highly Vulnerable Use" under Planning Practice Guidance (PPG).

The proposal therefore fails the sequential and exception tests required for flood-prone locations, and is in breach of:

- NPPF Paragraph 167 (requiring development to be appropriately flood resilient);
- PPTS Paragraph 13(g) - sites must not be at high risk of flooding;
- Precedent: APP/B5480/A/11/2151483 (Romford) - Traveller sites refused on similar flood vulnerability grounds.

4. Access Constraints and Undeliverability

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable.

This constraint breaches key policy requirements: - Manual for Streets (DfT, 2007) - minimum access width standards; - PPTS Paragraph 13(b) - sites must be accessible and deliverable; - Equality Act 2010 - provision must not create unequal or unsafe conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 parcels. Following Camden's internal filtering, only two sites were proposed for allocation in the Regulation 19 Draft Plan. However:

- The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- The allocation of Site C27 was not disclosed during earlier consultation rounds. Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation.

This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and risks procedural unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM's methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly applied filters that would exclude sites: - Within 18m of 4+ storey buildings (overlooking); - Used as amenity or play space; - At risk of surface flooding; - Without safe vehicular access.

Site C27 presents all four of these exclusionary criteria and should not have progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

The failure to explain why 19 of the 21 shortlisted sites were rejected while Site C27 was taken forward is problematic. The Site Selection Topic Paper (April 2025) notes that many were excluded due to existing use, access, or amenity conflict - all of which apply equally (or more severely) to Site C27.

The absence of a robust comparative analysis or scoring matrix raises concerns about the objectivity and soundness of the site selection process. The plan has therefore not met the NPPF tests of: - Justification (why this site over others); - Effectiveness (deliverability); - Consistency (application of methodology).

Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to: - The loss of essential amenity space; - Inherent flood, privacy, and access constraints; - A flawed and opaque site selection process.

It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

- Chapter 4 Central Camden: Table 5

- Chapter 7: Meeting Housing Needs: Policy H11

-Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Fleur

Responder 606

Planning Policy Team

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

27 June 2025

Dear Camden Planning Policy Team,

London Borough of Islington response to Proposed submission Draft New Camden Local Plan - Public Consultation (Reg 19)

Thank you for providing us with the opportunity to comment on the London Borough of Camden's Draft New Local Plan Regulation 19 consultation. We welcome the ongoing engagement on planning matters and support the overall aims of the Draft Local Plan document.

We have a further specific comment on the Draft Local Plan which we would like raise.

Design and Heritage

Islington support high density development where the quality of development is not compromised, Islington requires all forms of development to be high quality, and set out the locations where tall buildings (over 30 metres) may be suitable in our Local Plan. Camden's Submission Draft Plan also includes a Tall Building Policy.

Camden have amended Policy D2 in response to comments from Islington to include the consideration of the relationship between the building and neighbouring boroughs where tall buildings are proposed close to the borough boundary. Islington would like to suggest a further minor change to part 8 of this policy so that it specifically includes reference to heritage assets in neighbouring boroughs. Our suggested text is as follows: "the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets **(including in neighbouring boroughs where impacted)** in accordance with Policy D5 (Historic Environment)".

We agree that consideration of tall buildings needs to fully consider the various criteria set out in Part C of draft Policy D2 and we've reviewed the proposed amendments in the proposed submission draft and consider this further minor tweak set out in bold above is necessary to ensure that heritage assets in Islington are considered as this is not addressed by D2, part C(2).

I hope that the above comment is helpful. If you have any questions regarding any matters raised in this letter please do not hesitate to contact me.

Yours sincerely,



Islington Council

Date: Fri, 27 Jun 2025 15:22:34 +0000
From: Gore, [REDACTED]
To: PlanningPolicy
Subject: Camden Local Plan Representations

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Planning Policy
London Borough of Camden

Date: 27th March 2025

Sent by email only:
planningpolicy@camden.gov.uk

London Borough of Camden – Representations to the Proposed Submission Draft New Camden Local Plan

Dear Sir/Madam,

On behalf of our Client, Lazari Investments Ltd, please see the below comments on the London borough of Camden (LBC) Local Plan Proposed Submission Draft.

Lazari Investments Ltd own numerous properties across LBC including the Met Building and Maple House along Tottenham Court Road, The Lantern (Stephenson House), Brunswick Centre, Greater London House and Shropshire House. The majority of the portfolio is existing commercial buildings in office use with small amounts of retail and residential units.

We provide the below comments to the consultation document.

Policy H2 – Maximising the supply of self-contained housing from mixed-use schemes

We recognise that Camden has a strong focus on delivering self-contained homes and this is a requirement across London. However, we do have concerns that the requirement to deliver housing from non-residential schemes will undermine economic development objectives within the South Camden area and the CAZ particularly.

The current and emerging policy both require uplifts of non-residential floorspace of 200 sq m or more to deliver 50% of the uplift in floorspace as self-contained housing. The objective is for such residential to be delivered on-site before looking at off-site options and exceptionally a payment in lieu.

The adopted and emerging policy is in direct conflict with the adopted London Plan policies related to the CAZ such as Policy SD4 and SD5 which clearly outlines that new residential development should not compromise the strategic functions of the CAZ. The adopted policy is becoming increasingly difficult for commercial developers to deliver the required economic growth needed within the CAZ and we do not consider that the CAZ should have any residential requirement for commercial developments.

The primary concern with this policy is that it discourages developers to undertake even minor uplifts in commercial floorspace above 200 sq m due to the requirement to either deliver residential on-site or go through an extensive pre- and post-application exercise to justify why residential can't be delivered on/off-site causing significant delays to planning discussions and applications (often including elongated viability discussions). Instead, the knock-on effect

of this policy is that developers are incentivised to simply refurbish buildings or not to maximise development opportunities by ensuring commercial uplifts remain below the 200 sq m figure and therefore not delivering on the economic growth required by the Borough and indeed London.

These are particular concerns for developments which involve modest uplifts in commercial floorspace within a single building (e.g. one storey extensions) being required to deliver very small amounts of residential within largely commercial buildings. Delivering a small amount of residential on commercial sites is not palatable to many commercial developers and will stymie the future development potential of assets. Therefore, developers often choose to not add the required area to trigger the adopted and emerging mixed-use policies, which does not achieve the growth objectives for housing or commercial development.

Other Boroughs in Central London previously had mixed-use policies, most notably Westminster and the southern part of Islington. However, both these Boroughs have since removed their mixed-use policies from their newly adopted plans meaning LBC is now the only London Borough still proposing a mixed-use policy in their local plan. The Inspector for the Westminster City Plan (2021) specifically deleted the proposed Westminster mixed-use policy which sought to require developers to deliver affordable housing/make payments towards affordable housing from office and hotel uplifts and we consider a consistent approach should be applied in Camden.

We fear this policy will discourage investment in commercial development within the Borough compared to other Central London Boroughs where mixed-use policy is not a requirement (especially Westminster as the adjoining Borough in the West End). Therefore, we propose that Policy H2 is deleted.

Should the mixed-use policy remain in some form, we propose that a more suitable mechanism would be to require commercial developments within the CAZ to provide a financial contribution to aid housing developments in the Borough rather than requiring housing on-site or off-site on individual commercial schemes. A further option would be to require schemes with larger uplifts only to deliver housing. For example, schemes that delivered 2,000 sqm additional commercial floorspace (1,000 sq m of commercial and 1,000 sq m of residential) would be more appropriate than the current 200 sq m approach.

The adopted and emerging requirement of 200 sq m to trigger housing delivery is far too small and leads to issues of deliverability of very small number of residential units within commercial buildings. We appreciate there is some flexibility in paragraph 7.57 that schemes with under 1,000 sq m additional floorspace may struggle to deliver housing, but this needs to be clearer in the actual policy text to ensure very minor commercial developments do not remain compromised by this policy.

Policy IE4 – Affordable Workspace

This policy proposes all major schemes delivering over 1,000 sq m Class E(g) use contribute to affordable workspace seeking a working benchmark of 20% of the net additional floorspace to be provided at 50% market rent for a period of 15 years. The policy outlines a hierarchy with a starting point for on-site delivery of affordable workspace followed by off-site and finally a payment in lieu.

Firstly, we question the local need for affordable workspace – evidencing local need for affordable workspace in the Local Plan period is a requirement of London Plan Policy (Part C of Policy E3). It should be made clear what the affordable workspace need is across LBC and what type of spaces are required. There are already natural different pricing points in the rental market for commercial space leading to a natural range of rents across Camden already.

We are pleased the Proposed Submission Draft has made clear that any affordable workspace requirement will be 20% on net additional floorspace (rather than gross within the previous version). However, 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.).

We question the justification for seeking 20% affordable workspace, which is higher than the requirement across many Central London Boroughs. This is particularly true when considered alongside the viability implications of delivering housing/ affordable housing (or the payment in lieu) required under Policy H2 as currently drafted.

Such combined requirements will provide viability challenges to commercial developers, and we fear could disincentive economic investment and development within Camden and result in the Borough failing to achieve its economic development objectives.

A comparison of the policies in the West End across Westminster and Camden shows the additional financial burden of development in Camden compared to Westminster. A 2,000 sq m office uplift in Camden would be required to deliver 1,000 sq m of housing on-site (of which 20% of floorspace would be affordable housing). The alternative would be a payment of £1.5 million as well as the affordable workspace requirements listed above for 20% of the office space to be at a 50% market rate. Within Westminster, there would be no such housing/affordable housing or affordable workspace requirements, outlining the disparity between the requirements of the two West End Boroughs when it comes to commercial developments.

Summary

We are very concerned that the combined effect that Policy H2 and IE4 will have on the deliverability and viability of commercial developments within the CAZ and do not consider either policy is justified or effective in securing the economic growth required for the CAZ or meeting the aspirations of the adopted London Plan. Therefore, we do not consider these elements of the plan are sound.

Thank you for the opportunity to submit representations to this document and we look forward to our representations further.

Yours sincerely



Matt Gore



Date: Fri, 27 Jun 2025 16:23:26 +0100

From: Sue Summers

To: [redacted]

Subject: Site C27 Land East of Constable House Adelaide Road (Gypsy and Traveller Site)

While I have sympathy for the traveller population, I am writing as a Camden resident [redacted] to object in the strongest possible terms to this proposal. The site is unsuitable in every way - for a start, it is far too small to be a meaningful site for this population.

It is located in the area of quiet residential streets, whose character will be changed - quite unnecessarily - and whose residents are quite understandably completely opposed to the plan, fearing a resulting increase in local crime and disruption.

I do not know what Camden was thinking in earmarking this unsuitable site for this purpose. The council should be putting the interests of its residents and rate payers first.,

[redacted]

SUE SUMMERS

[redacted email]

Date: Fri, 27 Jun 2025 15:24:25 +0000
From: Rachel Power
To: PlanningPolicy
Subject: Representations on Behalf of Regal | Local Plan Regulation 19
Consultation

PARTNER

[redacted address] [redacted email]

This e-mail is intended solely for the person to whom it is addressed. It may contain confidential or privileged information. If you have received it in error, please notify the sender immediately and destroy the transmission. You must not copy, distribute or take any action in reliance on it.

BEWARE OF CYBER-CRIME: Our banking details will not change during the course of a transaction. Should you receive a notification which advises a change in our bank account details, it may be fraudulent and you should notify Montagu Evans who will advise you accordingly.

Montagu Evans LLP is a limited liability partnership registered in England and Wales. Registered number OC312072. A list of members' names is available for inspection at the registered office [redacted address] Mary Axe, London [redacted postcode].

Development Interests in Camden

Regal secured a resolution to grant planning permission (subject to the signing of a Section 106 Agreement) for Section 73 amendments to the development at 100 Avenue Road at planning committee in June 2025 (application reference 2025/0852/P). The development will deliver a 25 storey tower and a 7 storey lower block with 237 residential homes including 35% affordable housing. In comparison to the extant permission, the amended scheme delivers an additional 53 homes and improves the design quality, fire safety, sustainability measures and landscaping of the development.

The proposed development at 33-35 Jamestown Road also received a resolution to grant planning permission at planning committee in June 2025 (application reference 2024/4953/P). This redevelopment will deliver a Purpose Built Student Accommodation (“PBSA”) (178 bedspaces), 27 affordable homes and commercial space across two blocks.

Planning permission has also been secured by Regal at 100 and 100A Chalk Farm Road (application reference 2024/0479/P). This development is for four new blocks varying in height from 6 to 12 storeys, housing 265 student bedrooms, 30 affordable homes and c.850 ground floor commercial space, as well as significant new public realm along Chalk Farm Road.

Regal is also exploring other opportunities for new schemes across the Borough and are keen to retain their positive relationships with the Council to bring forward additional sites to contribute towards the needs of local residents.

Scope of Representations

We have reviewed the Regulation 19 Draft New Camden Local Plan in the context of Regal’s development interests and provide our recommendations to ensure that the Draft Plan is capable of meeting the tests of ‘soundness’ established in Paragraph 36 of the National Planning Policy Framework (“NPPF”). Plans are ‘sound’ if they are:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

Proposed Representations

Please find the relevant policy extracts in the tables below, which include our representations (in red) below:

Chapter 7 – Meeting Housing Needs

<p>Policy H1</p> <p>Maximising Housing Supply</p>	<p>A. The Council will aim to deliver at least 11,550 additional homes from 2026/27 to 2040/41.</p> <p>B. The Council will seek to secure a sufficient supply of homes to meet the needs of existing and future households in Camden to and meet or exceed the above housing target by:</p> <ol style="list-style-type: none"> 1. regarding permanent self-contained housing as the priority land-use of the Local Plan; 2. 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; 3. working to return vacant homes to use and ensure that new homes are occupied; 4. resisting the further development in Camden of housing for use as short-term lets, unless it can be demonstrated to the Council’s satisfaction that the site is unsuitable for the provision of any form of permanent housing;
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	<ol style="list-style-type: none"> 5. where sites are identified for development of permanent housing (particularly permanent self-contained housing) through a current planning permission or in a development plan, resisting development for an alternative use (other than a short-term meanwhile use compatible with subsequent permanent housing development), unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for the identified form of permanent housing, or (in the case of non-housing proposals) for any alternative form of permanent housing; 6. where sites are underused or vacant, expecting the optimum provision of permanent housing (giving priority to permanent self-contained housing), unless it can be demonstrated to the Council's satisfaction that the site is unsuitable for the provision of permanent housing, or has no realistic prospect of timely development for permanent housing; and 7. optimising the homes delivered on each site by using a design-led approach, in accordance with policies for design and heritage in the London Plan and the Local Plan, including any relevant space standards, to achieve the maximum reasonable provision of housing that is compatible with any other uses needed on the site. <p>C. We will monitor the delivery of additional housing against the housing target and seek to maintain supply at the rate necessary to meet the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or rental value of different house types and tenures, and the needs of different groups.</p>
<p>Policy H1 Representations</p>	<p>Regal continues to be supportive of LBCs ambition to deliver at least 11,550 additional homes and recognises the importance of prioritising self-contained homes as set out in Policy H1 Part B, (1).</p> <p>Regal welcome the introduction of Part B (2), which provides support to other forms of permanent housing to meet more specific needs (such as PBSA). The introduction of Part 2 (6) provides a more positive basis against which to assess applications on unallocated underused or vacant sites, allowing for alternative types of housing delivery where the site is not suitable for permanent housing or has no realistic prospect of timely development for permanent housing.</p> <p>Under current market conditions, delivering schemes which provide self-contained (Class C3) homes is usually not viable without compromising on the quantum of affordable housing provision (unless there are very site-specific circumstances which can support this, for example at 100 Avenue Road). As such the approach of facilitating alternative types of more viable housing delivery (including PBSA) which will enable schemes to deliver affordable housing despite the challenging market.</p> <p>We are encouraged by the sentiment in supporting paragraph 7.15 which acknowledges the challenging market conditions for housebuilders, and that it may be necessary to diversify the housing supply to maximise delivery, which may necessitate the delivery of traditional non-self contained homes.</p>

<p>Policy H4 Maximising the supply of Affordable Housing</p>	<p>A. The Council supports the London Plan’s strategic target for 50% of London’s new homes to be genuinely affordable. The Council will aim to maximise the supply of affordable housing, meet or exceed a borough wide strategic target of 3,000 additional affordable homes from 2026/27 - 2040/41, and achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.</p> <p>B. We will expect a contribution to affordable housing from all major developments involving housing, and non-major developments that provide one or more additional homes and involve a total addition to housing floorspace of 100 sqm GIA or more. The Council will seek to negotiate the contribution to affordable housing on the following basis:</p> <ol style="list-style-type: none"> 1. distinctive criteria will apply to smaller developments considered to have capacity for 15 or fewer additional homes, and larger developments considered to have capacity for 16 or more additional homes; 2. development capacity will be assessed on the basis that 100sqm (GIA) of housing floorspace creates capacity for 1 home; 3. in assessing development capacity, the additional housing floorspace will be rounded to the nearest 100 sqm (GIA); 4. in the case of smaller developments, a sliding scale target will apply, starting at 2% for developments with capacity for one additional home and increasing by 2% for each home added to the capacity (reaching an affordable housing target of 30% for developments with capacity for 15 additional homes); 5. in the case of larger developments, the London Plan’s strategic affordable housing target of 50% will apply, but will be subject to the London Plan’s viability threshold approach; 6. in all cases, we will apply a guideline mix of affordable housing types to seek 60% low-cost rented housing and 40% intermediate housing; 7. in all cases, we will assess the percentage of affordable housing and 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; 8. for the largest developments involving housing (typically those providing 100 homes or more), the Council may seek affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision; 9. the affordable housing sought should be provided on site wherever practical, particularly in the case of larger developments; 10. where affordable housing cannot practically be provided on site, or off site provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing off site in the same area, or exceptionally a payment-in-lieu; and 11. in the case of estate regeneration proposals, the distinctive affordable housing provisions for this type of development in Policy H5 and the London Plan will apply. <p>C. We will seek to ensure that where development sites are split, additional proposals are brought forward on the same site, or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution is comprehensively assessed for</p>
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	<p>all the proposals together. The Council will seek to use planning obligations to ensure that all parts or phases of split or related sites make an appropriate affordable housing contribution.</p> <p>D. Where a development of build to rent housing, purpose-built student accommodation, or large-scale purpose-built shared living is proposed, we will apply the distinctive affordable housing provisions of the London Plan for the relevant housing type, but as an alternative will strongly encourage contributions of self-contained affordable housing on these development sites in accordance with the guideline mix set out in criterion 6 of Part B above where feasible, having regard to whether developments are able to include separate blocks and/ or stair/ lift cores.</p> <p>E. In considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:</p> <ol style="list-style-type: none"> 1. any existing housing on site, including market housing and affordable housing, the provisions for protection of existing housing and estate regeneration proposals in Policies H3 and H5, and the impact that the existing housing has on the financial viability of the development; 2. any self-build or custom-build housing proposed, and whether this housing is consistent with the objective of Policy H1 to optimise the homes delivered on each site; 3. any housing proposed for people with care or support requirements (notably specialist older persons housing), the objectives of Policy H8, and any relevant provisions of the London Plan; 4. the character and size of the development, and any constraints on developing the site for a mix of housing including market and affordable housing or the particular types of affordable provision sought; 5. the impact on creation of mixed, inclusive and sustainable communities; 6. the impact of the mix of housing types sought on the efficiency and overall quantum of development; 7. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors, such as build to rent housing, and any recommendations of an independent viability assessor commissioned to advise the Council; and 8. whether an alternative approach could better meet the objectives of this policy and the Local Plan. <p>F. Having regard to the London Plan, where a development's contribution to affordable housing falls significantly short of the Council's targets due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek early, mid-term and / or late stage viability reviews to determine the maximum contribution to affordable housing deliverable by the development.</p>
<p>Policy H4 Representation</p>	<p>Regal is supportive of the aims of Policy H4 which aligns with the London Plan strategic target for 50% of London's new homes to be genuinely affordable. The additional clarification in Policy H4 Part B (5) of the policy that this target will apply, but subject to the London Plan's viability threshold approach is welcomed as this provides further consistency with regional policy.</p>

	<p>The clarification in Part B (7) that affordable housing will be assessed against both the proposed housing floorspace and the proposed number of habitable rooms is welcomed.</p>
<p>Policy H6 Housing Choice and Mix</p>	<p>A. The Council will aim to minimise social polarisation and create mixed, inclusive, sustainable and multi-generational communities by seeking a variety of housing suitable for Camden’s existing and future households, having regard to household type, size, income and any particular housing needs.</p> <p>B. When negotiating the types of housing included in developments in Camden, we will:</p> <ol style="list-style-type: none"> 1. apply all relevant elements of design policies and guidance associated with the London Plan and the Local Plan, including Local Plan Policy D3 (Design of Housing); 2. expect all new housing to be accessible, and expect new-build self-contained housing to meet the specific requirements of Parts M4(2) or M4(3) of the Building Regulations in accordance with Policy D3 (Design of Housing); 3. require self-contained housing to include a range of dwelling sizes in accordance with Policy H7 (Large and small homes); 4. seek provision of the types of housing appropriate to meet the particular needs identified by Policies H8 (Housing for people with care or support requirements), H9 (Purpose-built student accommodation), and H11 (Accommodation for travellers); 5. seek a diverse range of housing products in the market and affordable sectors to meet the needs across the spectrum of household incomes; 6. support build to rent developments where this will assist the creation of mixed, inclusive and sustainable communities and comply with all relevant Local Plan policies, including Policy H4 (Maximising the supply of affordable housing), particularly the encouragement in Part D to provide affordable housing in accordance with our guideline mix of 60% low-cost rented housing (homes for Social Rent or London Affordable Rent) and 40% intermediate housing; 7. seek provision suitable for service families and people wishing to commission or build their own homes; and <p>support the 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.</p>
<p>Policy H6 Representations</p>	<p>The aspiration to create mixed, inclusive, sustainable and multi-generational communities by seeking a variety of housing is supported by Regal. We welcome the inclusion of Policy H6 Part B (4), which encourages the provision of types of housing appropriate to particular needs, including student accommodation.</p> <p>However, within Part B (6) of the policy, reference to the delivery of PBSA, as being able to assist in the creation of mixed, inclusive and sustainable communities has been removed in the Regulation 19 version of the plan. Regal would request that PBSA is explicitly referred to this in policy, alongside build to rent developments.</p>

<p>Policy H7 Large and Small Homes</p>	<p>A. The Council will aim to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce the imbalance between housing needs and existing supply.</p> <p>B. The Council will seek to ensure that all housing development including the conversion of existing homes and non-residential properties:</p> <ol style="list-style-type: none"> 1. includes a mix of large homes (homes with three bedrooms or more) and small homes (studio flats, 1-bedroom and 2-bedroom homes); and 2. contributes to meeting the Dwelling Size Priorities set out in Table 9 below. <p>C. The Council will seek to maintain and augment the stock of market homes with three bedrooms by:</p> <ol style="list-style-type: none"> 1. resisting the loss of three-bedroom market homes from development involving existing housing, particularly where the homes have direct access to external amenity space; and 2. expecting provision of at least one three-bedroom home from development that subdivides an existing large home (with three bedrooms or more). <p>D. The Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, where the applicant can justify this having regard to:</p> <ol style="list-style-type: none"> 1. the distinct Dwelling Size Priorities for each tenure set out in Table 9 below; 2. any evidence that borough-wide priorities differ from needs in a particular area or the needs relating to a particular sector such as build to rent development; 3. the existing mix of dwelling sizes in the area, and the impact of large homes on child density; 4. the character and size of the development, and any constraints on developing the site for a mix of homes of different sizes; 5. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build to rent development, and any recommendations of an independent viability assessor commissioned to advise the Council; and 6. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing. <p>Table 9 Dwelling Size Priorities</p> <table border="1" data-bbox="454 1697 1364 1915"> <thead> <tr> <th></th> <th>1-bedroom (or studio)</th> <th>2-bedroom</th> <th>3-bedroom</th> <th>4-bedroom (or more)</th> </tr> </thead> <tbody> <tr> <td>Low-cost rented</td> <td>lower</td> <td>medium</td> <td>high</td> <td>medium</td> </tr> <tr> <td>Intermediate affordable</td> <td>high</td> <td>medium</td> <td>lower</td> <td>lower</td> </tr> <tr> <td>Market</td> <td>high</td> <td>medium</td> <td>high</td> <td>lower</td> </tr> </tbody> </table>		1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)	Low-cost rented	lower	medium	high	medium	Intermediate affordable	high	medium	lower	lower	Market	high	medium	high	lower
	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)																	
Low-cost rented	lower	medium	high	medium																	
Intermediate affordable	high	medium	lower	lower																	
Market	high	medium	high	lower																	
<p>Policy H7 Representations</p>	<p>Regal recognise the importance of securing a range of homes of different sizes as outlined in Policy H7 and support the need for a mix of small and large homes. The Regulation 19 version</p>																				

	<p>of the plan proposes changes to the Dwelling Size Priorities table relating to market homes. The changes include increasing the priority for market 1 bedroom homes from 'lower' to 'high', and for market 2 bedroom homes from 'high' to 'medium'. The increased priority for the delivery of market 1 bedroom homes is supported by Regal, as this reflects the demand they are currently seeing in the market.</p> <p>It is reassuring, that the Dwelling Size Priorities table will be applied flexibly where applicants can provide justification. In our view the appropriate residential unit mix will vary from development to development on a case-by-case basis. Policy H6 Part D (5) identifies that the unit mix of a scheme may be impacted by economic and financial viability of the proposed development. The Regulation 19 version of the Local Plan indicates that deviations from the dwelling size priorities which are required for viability reasons would be tested by an independent viability assessor. This approach is not considered to be appropriate because of the relatively loose 'dwelling size priority' approach which does not set specific percentage targets for different unit sizes / tenures, making it challenging to identify what level of deviation would result in the need for viability testing. The introduction of independent viability testing to justify a change to the unit mix priorities would also add considerable delay to the pre-application / determination process, at a time when greater speed and certainty is required for developers, to significantly boost housing delivery in the borough.</p> <p>As such we propose the following change to Policy H Part D (5):</p> <p><i>“the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build to rent development, and any recommendations of an independent viability assessor commissioned to advise the Council”;</i></p>
Policy H9 Purpose-Built Student Accommodation	<p>A. 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 in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.</p> <p>B. 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 and will support the development of student housing provided that the development:</p> <ol style="list-style-type: none"> 1. will not involve a disproportionate loss of self-contained homes (particularly homes with 3 bedrooms), having regard to the overall addition to housing supply; 2. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing; 3. complies with any relevant standards for houses in multiple occupation and any relevant residential design standards to provide safe, functional, adaptable and accessible spaces, including shared spaces, outdoor amenity space and laundry facilities;

	<ol style="list-style-type: none"> 4. includes a range of accommodation to suit students with differing lifestyles and incomes, including cluster flats where possible; 5. for the full duration of all terms in the academic year, will be secured for students at the Council's recognised higher education institutions, which will generally be those in Camden and adjoining London boroughs that are funded by the Office for Students; 6. will have nominations agreements in place to provide housing for students at one or more recognised higher education institutions, including nominations agreements for any affordable student accommodation incorporated in the development; 7. will be accessible to public transport and will not have a detrimental impact on the transport network; 8. contributes to creating a mixed, inclusive and sustainable community; 9. protects residential amenity in accordance with Policy A1; 10. will be accompanied by a Student Management Plan, and a Non-student Management Plan where alternative uses are proposed outside term-time; 11. will be managed as a single planning unit; and 12. provides affordable student accommodation or otherwise provides an appropriate contribution to affordable housing in accordance with Policy H4, particularly Part D. <p>C. The Council will resist development that involves the net loss of student housing unless:</p> <ol style="list-style-type: none"> 1. either it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing; 2. or adequate replacement accommodation will be provided that satisfies the criteria in Part B above; 3. or it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere; <p>and in the case of proposals satisfying points 1, 2 or 3, the development creates an equivalent or greater amount of floorspace in an alternative permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.</p>
<p>Policy H9 Representations</p>	<p>On some sites across London, Regal have delivered alternative types of housing (including PBSA), for example receiving planning permission for student accommodation alongside C3 residential at 100 and 100a Chalk Farm Road and a resolution to grant permission (subject to signing a s.106 agreement) at 33-35 Jamestown Road. It is Regal's 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.</p> <p>The proposed revisions in the Regulation 19 version of Policy H9 provide improvements which recognise that student accommodation is a crucial contributor to wider housing delivery. However, the following amendments are proposed to enable (where appropriate) its delivery</p>

	<p>even further, and to ensure that the Local Plan is positively prepared, justified, effective and consistent with national policy:</p> <ul style="list-style-type: none"> • <i>Policy H9 Part B (1) - Regal seeks further clarity on this subsection, questioning if the disproportionate loss of self-contained homes is considered against the overall addition to housing supply (when considered against the ratio of 2.5 student bedrooms to 1 self-contained home). Further clarity is required for this policy criteria to be effective and consistent with the London Plan</i> • <i>Policy H9 Part B (2) - Regal welcome this criteria which provides flexibility to provide a range of student typologies. However, the policy could be improved to be better justified and aligned with market conditions through the proposed revisions below:</i> <p><i>“includes a range of accommodation to suit students with differing lifestyles and incomes, including cluster flats where possible, <u>reflecting demonstrated demand</u>”</i></p>
<p>Policy H10 Housing with Shared Facilities (including Large-scale Purpose-built Shared Living)</p>	<p>A. The Council will aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with modest space requirements.</p> <p>B. The Council will support development of housing with shared facilities provided that the development:</p> <ol style="list-style-type: none"> 1. will not involve a disproportionate loss of self-contained homes (particularly homes with three bedrooms), having regard to the overall addition to housing supply; 2. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it can be demonstrated to the Council’s satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing; 3. complies with any relevant standards for houses in multiple occupation, any relevant residential design standards, and relevant elements of Local Plan Policy D3 (Design of Housing); 4. contributes to creating a mixed, inclusive and sustainable community; 5. protects residential amenity in accordance with Policy A1; 6. in the case of large-scale purpose-built shared living, complies with the distinctive London Plan provisions for large-scale purpose-built shared living in addition to the preceding provisions of Part B; 7. in the case of large-scale purpose-built shared living, provides a contribution to affordable housing in accordance with Policy H4, particularly Part D; and 8. in the case of other housing with shared facilities such as larger houses in multiple occupation, provides an appropriate contribution to affordable housing in accordance with Policy H4, particularly Parts B, C and E.

	<p>C. The Council will resist development that involves the net loss of housing with shared facilities other than large-scale purpose-built shared living (primarily the loss of houses in multiple occupation) or the self-containment of any part of such housing unless:</p> <ol style="list-style-type: none"> 1. either it can be demonstrated that the accommodation is incapable of meeting any relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities; 2. or adequate replacement housing with shared facilities will be provided that satisfies the criteria in Part B above; 3. or the development converts the existing accommodation to provide self-contained housing (in Use Class C3) including at least one home with 3 bedrooms; 4. or the development relates to existing affordable housing and provides self-contained affordable homes; <p>5. and in the case of proposals satisfying points 1, 2 or 3, the development creates an equivalent or greater amount of floorspace for permanent self-contained housing (in Use Class C3), complies with the nationally described space standard as far as possible, and makes an appropriate contribution to affordable housing, having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.</p>
<p>Policy H10 Representations</p>	<p>Regal welcome the introduction of a specific Local Plan policy which considers Large-scale Purpose-built Shared Living Accommodation (“LSPBSLA” or “co-living”). As per our representations above, the incorporation of co-living as an alternative type of housing, often offers the ability to unlock development sites which are challenging to viably bring forward for the delivery of self-contained homes. Co-living accommodation can make a valuable contribution to the delivery of a variety of housing types in the borough.</p> <p>The following amendments are proposed to enable (where appropriate) its delivery even further, and to ensure that the Local Plan is positively prepared, justified, effective and consistent with national policy:</p> <p><i>Policy H10 Part B (1) - Regal seeks further clarity on this subsection, questioning if the disproportionate loss of self-contained homes is considered against the overall addition to housing supply (when considered against the ratio of 1.8 non-self contained communal accommodation to 1 self-contained home). Further clarity is required for this policy criteria to be effective and consistent with the London Plan.</i></p>

Chapter 8 – Responding to the Climate Emergency

<p>Policy CC1 Responding to the Climate Emergency</p>	<p>A. The Council will expect development to prioritise the provision of measures to mitigate and adapt to climate change. Development should meet the highest feasible environmental standards during construction and occupation and respond to the climate emergency by:</p> <ol style="list-style-type: none"> 1. prioritising and enabling the repurposing and re-use of existing buildings over demolition;
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	<ol style="list-style-type: none"> 2. minimising waste and whole life carbon, and increasing the re-use of resources; 3. supporting the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building; 4. ensuring that new buildings are designed and constructed to be net zero carbon in operation; 5. utilising low carbon technologies and maximising opportunities for renewable energy generation and heat networks; 6. being designed to be resilient to climate change by minimising the risk of overheating, improving water efficiency, and minimising and avoiding the risk of flooding from all sources; 7. protecting and enhancing existing green spaces and water sources, enhancing biodiversity, strengthening nature recovery and providing multi-functional green infrastructure; 8. mitigating and improving poor air quality in the borough; and 9. prioritising sustainable transport <p>B. The Council will expect developers to demonstrate how sustainable development principles have been incorporated in the design and proposed implementation of their scheme. For developments creating one or more additional homes or delivering 500 sqm or more of additional or re-provided floorspace a Sustainability Statement will be required.</p>
<p>Policy CC1 Representations</p>	<p>The aspiration to prioritise the provision of measures to mitigate and adapt to climate change is supported by Regal. It is Regal’s experience that sites across London are often constrained and unable to achieve net zero carbon in operation. Point 4 of Policy CC1 which requires that new buildings are designed and constructed to be net zero carbon in operation is therefore not realistic. This requirement will be particularly challenging to comply with as it fails to consider the potential constraints which are likely to be encountered.</p> <p>Regal would propose a degree of flexibility into the policy wording to allow for instances where it is not feasible to achieve net zero in operation. A proposed policy wording is set out below in order to ensure that the Local Plan is positively prepared:</p> <p><i>Policy CC1 Part 4 - Encouraging new buildings to be designed and constructed to be net zero carbon in operation, where feasible.</i></p>

Chapter 9 – Delivering an Inclusive Economy

<p>Policy IE4 Affordable Workspace</p>	<p>A. The Council will require schemes to contribute towards a mixed and diverse economy that allows a variety of business types and sizes to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:</p> <ol style="list-style-type: none"> 1. require all major schemes providing at least 1,000sqm GIA of offices, research and development uses or light industry (use classes E(g)(i), E(g)(ii), E(g)(iii)) to contribute to the delivery of affordable workspace;
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	<p>2. seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years; and</p> <p>3. apply the following hierarchy when securing affordable workspace:</p> <ul style="list-style-type: none"> a. on-site provision of affordable workspace that meets locally identified requirements in terms of type and specification (configuration, fit out, etc.) and addresses the demands of priority sectors and small and medium enterprises; b. off-site provision of affordable workspace on another site in the borough that meets the requirements in A.3.a above. There should be a clear link between the off-site location and priorities for affordable workspace provision identified in the Council's Affordable Workspace Strategy; c. a payment in lieu of provision that can be invested by the Council, which is equivalent to the cost of on-site delivery, in line with the payment in lieu calculator below. This will be used by the Council to fund affordable workspace elsewhere in the borough <p>B. 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 support a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. Any provision must be consistent with the definition of affordable workspace set out in the London Plan.</p> <p>C. Where affordable workspace is provided, the Council will expect the applicant to submit an operating plan, setting out what model of affordable workspace is to be provided, sectors/occupiers to be targeted and details of how the space will be managed</p> <ul style="list-style-type: none"> 1. D. The Council will expect the affordable workspace element of a mixed-use scheme to be made available for occupation at the same time as any employment floorspace at market rents.
<p>Policy IE4 Representations</p>	<p>Regal's previous representations highlighted the need for the affordable housing policy to reflect economic conditions which may impact the viability of delivering on-site affordable workspace or a payment in lieu of such provision.</p> <p>The Regulation 18 Local Plan stated that <i>"Where no affordable workspace is offered or a payment-in-lieu is not provided for viability reasons, we may seek a contribution via a late-stage viability review."</i> This reference has been removed in its entirety in the Regulation 19 draft of the plan.</p> <p>Regal support the removal of the proposed affordable workspace late-stage viability review (which would have been a disproportionate requirement, which may have been particularly prohibitive in bringing forward viable development proposals).</p> <p>However, the ability to consider the appropriate level of affordable workspace to be delivered on site (or through a payment in lieu) through viability testing should be retained within the draft Local Plan, rather than being removed. The removal of this text results in a lack of recognition</p>

	<p>of the economic challenges that developments can face. Acknowledging viability within affordable workspace policies is advocated in London Plan Policy E3 Part C, and therefore there would be issues of soundness when considering consistency with the London Plan. To ensure that the Local Plan is positively prepared, justified, and consistent with policy, the following amendment is requested:</p> <p><i>Policy IE4 Part B - Regal seeks the reinstatement of the ability for the provision of affordable workspace (either on-site or through a payment in lieu) to be considered subject to viability.</i></p>
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Chapter 12 – Design and Heritage

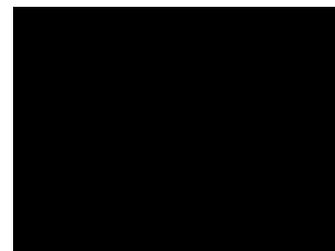
<p>Policy D2 Tall Buildings</p>	<p>A. The Council defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured from the lowest point on the ground to the uppermost part of any rooftop structures (including plant and lift overruns), as shown on Figure 22.</p> <p>B. Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Figure 22 and listed in Table 12. Guidance on building heights for specific sites is set out in relevant site allocation policies.</p> <p>C. The Council will assess proposals for buildings above the heights set out in Part A against the London Plan tall buildings policy and the design criteria in Local Plan Policy D1 (Achieving Design Excellence). We will also give particular attention to:</p> <ol style="list-style-type: none"> 2. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline, having regard to both the existing and the emerging context; 3. the relationship between the building and neighbouring boroughs, where tall buildings are proposed close to the borough boundary; 4. whether the proposal maximises energy efficiency and resource efficiency in accordance with Climate Change Policies CC3, CC4 and CC6; 5. whether the development delivers the highest standards of sustainable design and construction in line with Policy D1 (Achieving Design Excellence); 6. whether the proposal maximises the supply of affordable housing in accordance with Policy H4 (Affordable Housing); 7. whether the proposal creates a safe and secure environment in accordance with Policy A2 (Safety and Security); 8. whether the site is of a sufficient size to accommodate a tall building, without having a detrimental impact on existing buildings, public spaces and amenity; 9. the historic context of the building’s surroundings and whether the proposal preserves or enhances the historic environment and heritage assets in accordance with Policy D5 (Historic Environment); 10. the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views;
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	<ol style="list-style-type: none"> 11. the contribution a building makes to pedestrian movement and experience, connectivity and improved public accessibility; 12. the degree to which the building overshadows neighbouring buildings and spaces, especially public spaces, open spaces, watercourses and renewable energy infrastructure; 13. the relationship between the building and other neighbouring tall buildings; 14. the contribution the development makes to wider place making objectives and infrastructure delivery in line with Policies DS1 (Healthy and Sustainable Development), D1 (Achieving Design Excellence) and DM1 (Delivery and Monitoring); 15. the quality of homes and amenities provided; 16. the proposed internal and external illumination of the building. All tall building proposals will require a Lighting Strategy; and 17. the impact on biodiversity, for example migratory routes and bird collisions, in accordance with Policy NE2 (Biodiversity).
<p>Policy D2 Representations</p>	<p>With regard to policy D2, it is our view that good design principles need to be considered the highest priority when assessing the suitability of tall buildings. Across the Capital, tall buildings have successfully become celebrated parts of the skyline and townscape, with many examples next to or close by significant heritage buildings and conservation areas.</p> <p>Regal suggests that Part B of Policy D2 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. This reflects the approach endorsed through the London Plan, where tall buildings located outside of designated tall buildings zones should still be considered against the criteria identified in London Plan Policy D9 Part C (as supported through the High Court Judgment relating to London Borough of Hillingdon v Mayor of London [2021]).</p> <p>As such, to ensure the soundness of the plan, and consistency with policy, the proposed revision is sought:</p> <p style="text-align: center;"><i>Policy D2 Part B – “Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Figure 22 and listed in Table 12. Guidance on building heights for specific sites is set out in relevant site allocation policies. <u>Locations outside of designated tall building zones can also be considered, subject to compliance with the London Plan tall buildings policy and the criteria in Part C below.”</u></i></p>
<p>Policy D5 Historic Environment</p>	<ol style="list-style-type: none"> A. The Council will conserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments, historic parks and gardens, and locally listed buildings and structures. B. The Council will support heritage-led regeneration schemes and ensure that the local historic environment is at the heart of place making, to maintain the unique character of our heritage assets and deliver high quality new buildings and spaces which enhance their settings.

- C. Proposals which conserve or enhance heritage assets, 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.
- D. The Council will not permit development where it will cause total loss of significance, or substantial harm to a designated heritage asset, unless it can be demonstrated that the harm or loss is necessary to provide substantial public benefits that will outweigh the harm or loss caused, or:
1. the nature of the heritage asset prevents all reasonable viable uses of the site;
 2. no optimum viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 3. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 4. the harm to, or loss of the asset is outweighed by the benefit of bringing the site back into use.
- Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, harm will be weighed against the public benefits of the proposals, including, where appropriate, securing the optimum viable use of the heritage asset.
- E. The Council will resist any cumulative, incremental, changes to a designated heritage asset, where there is concern that the changes may impact on the significance of the designated heritage asset or may cause harm to the character and appearance of a conservation area.
- F. All applications with potential to affect a heritage asset or its setting must be supported by a Heritage Statement.
- G. The Council will support proposals to adapt and improve the energy performance of listed buildings, and buildings within conservation areas, to reduce energy demand, strengthen resilience, mitigate the impacts of climate change, and ensure they are adaptable to a changing climate in accordance with the policies set out in the climate change chapter of this Plan.
- H. Where a proposal 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.
- I. Where a 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 measures and the public benefits gained and weigh these against the harm to the significance of the heritage asset, giving significant weight to measures that respond to the climate emergency in a sensitive manner.
- J. Where works are proposed to a listed building, a whole building retrofit approach is recommended.

- K. The Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas in order to maintain their character and setting.
- L. The Council will:
1. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
 2. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
 3. resist development outside of a conservation area that causes harm to the character, appearance, and/or setting of the conservation area;
 4. 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; and
 5. seek to retain key views into and out of a conservation area.
- M. To conserve or enhance the borough's listed buildings, the Council will:
1. resist the total or substantial demolition of a listed building and rebuilding behind the façade of a listed building;
 2. resist proposals for a change of use, or alterations and extensions, including cumulative or incremental changes to a listed building, where this would cause harm to, or loss of, the significance of the building;
 3. resist development within the setting of a listed building that would cause harm to, or loss of, the significance of the building; and
 4. require any works to a listed building to be carried out in an appropriate manner, informed by suitably qualified heritage consultants, architects and contractors.
- N. The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting.
- O. The Council will expect priority to be given to the preservation and management of archaeological remains and their setting in situ, commensurate with the significance of the asset.
- P. Where it has been demonstrated to the Council's satisfaction that the preservation and management of archaeological remains in situ is not feasible, the Council will expect the site to be excavated; archaeological remains recorded and removed; a report produced; significant finds archived; and the results disseminated, prior to the commencement of development.
- Q. The Council will protect Registered Parks and Gardens and London Squares in the borough.
- R. Proposals which protect and enhance the character, fabric, features, setting, and views into and from the borough's Historic Parks and Gardens and London Squares will be supported.

Responder 610



Strategic Planning & Implementation, Regeneration and Planning,
London Borough of Camden,
Town Hall,
Judd Street,
London, WC1H 8ND

27 June 2025

Camden Local Plan Proposed Submission Draft April 2025

Representations by British Land

These representations to the Draft New Camden Local Plan, Submission Version April 2025 (Regulation 19) are submitted by British Land.

Representations to the Regulation 18 version of the Local Plan were submitted by British Land on 13 March 2024.

British Land is a UK commercial property company focused on real estate sectors with the strongest operational fundamentals. Our purpose is to create and manage outstanding places that deliver positive outcomes for all our stakeholders on a long term, sustainable basis. We do this by leveraging our best in class platform and proven expertise in development, repositioning and active asset management.

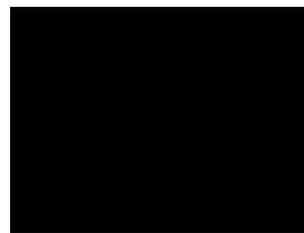
Regent's Place, in the Knowledge Quarter, is a mixed-use neighbourhood, attracting growth customers and sectors, and offering some of the best connected, highest quality and most sustainable space in London. Our vision for the campus is to create a dynamic and inclusive hub for science and technology-driven innovation to thrive, ensuring that communities and businesses in Camden benefit from our investment, building on over 40 years of local engagement.

We welcome the opportunity to comment on the draft Local Plan and set out our comments below. The paragraphs below relate to the relevant planning policies and supporting paragraphs in the draft Local Plan. British Land is a member of the London Property Alliance Camden Working Group (LPA CWG) and has contributed to and supports the responses submitted by that group.

Representations

In addition to the comments on each of the policies in isolation, there is overarching concern that the impact of the layering of policies and obligations within the Draft Local Plan, which are currently drafted with very little flexibility, will be extremely detrimental to the viability of development going forward. Furthermore, developers are required to deal with issues such as the Building Safety Act, Biodiversity Net Gain, Whole Life Carbon amongst a plethora of other issues. This additional burden adds time, resource and cost to preparing a planning application which is stifling development at a time when the Government is seeking growth.





As such, British Land consider that there should be a general policy introduced setting out strategic policy priorities and the need for a flexible and 'on balance' application of policies across the plan as a whole, to respond to changing economic conditions over the plan period and the unknown policy requirements in the new London Plan, and ensure that these strategic priorities are met. This will assist Camden in achieving its vision set out in We Make Camden.

The representations included herein are intended to support and, where necessary, propose modifications to ensure that the final Local Plan is positively prepared, justified, effective, and consistent with national policy, in line with the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF). Each comment is structured to identify specific policies within the Plan and is accompanied by an explanation of the concern or support, along with any suggested changes.

Chapter 1: Introduction

The draft Local Plan seeks to deliver on Camden's ambitions in "We Make Camden" and sets out strategic objectives and vision for development in the Borough which we continue to support.

It is noted that no sites in the Euston Area are allocated in this plan as they will be identified through the update to the Euston Area Plan. We welcome the opportunity to provide further comments on this plan when the Regulation 19 version is published later in the year.

Chapter 2: Development Strategy

We agree that there should be strong support for delivering new development within the Central Activities Zone.

Figure 03 illustrates the overall spatial strategy for Camden. As per our representations to the Regulation 18 draft, this should highlight the Knowledge Quarter reinforcing the crucial role of the Knowledge Quarter in delivering world-class science and technology-driven innovation and inclusive economic growth. As set out in Camden's KQ2050 Strategy, the Knowledge Quarter has the potential to lead the way in inclusive innovation and become the best place in Europe for collaboration, innovation and research, while enabling Camden's residents to fulfil their social and economic potential. It therefore plays a critical role in delivering inclusive growth for the Borough and London. This importance should be emphasised in a stand-alone Knowledge Quarter policy within the draft Plan.

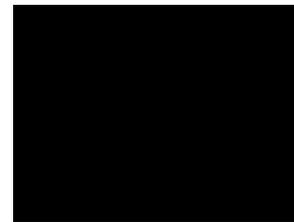
It is welcomed that the Euston area is recognised as a key area of growth (para. 2.17).

It is welcomed that Policy DS1 now makes specific reference to optimising the use of land.

We welcome the principle of a comprehensive approach to site design and layout, however given sites or areas are often in multiple land ownerships, bringing forward coherent and integrated developments, through the preparation of a joint masterplan, will be challenging in many instances and restrict development opportunities. It is suggested this reference is removed.

South Camden

Much of South Camden is located within the Central Activities Zone where the focus should be on growing and supporting the economic productivity of London.



Notwithstanding our comments on mixed use policy H2 set out below, we continue to support part (G) 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.

We support Parts J and K of the policy which acknowledges that the Central Activities Zone and Knowledge Quarter will continue to be the main focus of employment development in Camden. Requiring housing both on and off site in these locations is challenging in terms of viability, site availability and the potential conflict between land uses and may undermine the area's economic growth, productivity and future competitiveness, contrary to London Plan objectives.

Euston Area

The inclusion of Policy S2 is welcomed, given the Euston Area includes the British Land owned campus at Regents Place.

The objectives set out in Policy S2(a) are generally supported.

We suggest that the ambitions of "We Make Camden" are included in this policy to retain consistency across the borough, particularly in relation to para. 3.18.

Chapter 7: Meeting Housing Needs

Policy H2 - Maximising the supply of self-contained housing from mixed-use scheme

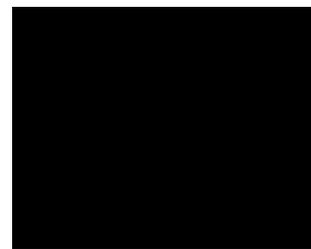
We acknowledge that Camden's priority is the delivery of self-contained housing but requiring housing from commercial led schemes undermines other policy objectives in the Plan and the London Plan. These policy objectives promote economic development within the Borough and in particular within the Knowledge Quarter.

Existing Local Plan Policy H2, which requires housing from commercial schemes, is increasingly challenging and threatens to undermine the deliverability of commercial development in the KQ. Camden is the only borough in London which still has a mixed-use policy, which impacts its 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 inconsistent with the London Plan. We therefore consider that Policy H2 should be deleted.

If Policy H2 is retained, it should not apply in the Knowledge Quarter. If the Knowledge Quarter is to retain its status as London's leading innovation district and meet the Council's own objectives in its KQ2050 strategy, commercial development in this area should be prioritised.

If a form of mixed-use policy is to remain in the Local Plan and apply to the Knowledge Quarter, we agree with the LPA CWG suggestion that it should take the form of a financial contribution to be applied to other Camden-led housing developments in the Borough rather than requiring housing to be provided on or off site in the KQ. This approach would prioritise much needed employment space and economic growth where it is needed and can support the role of the KQ whilst enabling the delivery of new homes on Camden's own estates, in line with Policy DS1.

If housing is required, we consider that it would be helpful to clarify that the Council will prioritise the delivery of affordable housing.



It is stated that off site housing should be “as close as possible to the application site.” However, as the council is aware, the opportunity to find an off site location in the KQ is rare, and if one is found the cost of acquiring the site can render many schemes unviable. This is not acknowledged in para. 7.60. Where an off-site solution is proposed the site selection should be based on whether the site is appropriate to maximise the planning benefits of both the application and donor sites, in the context of the Local Plan.

Chapter 8: Responding to the Climate Change Emergency

At British Land we fully recognise the climate emergency and support the overarching aspirations relating to climate change in the Local Plan. However, we consider that the policies contained within it are too prescriptive for a Local Plan and are most appropriately covered at the national level in Building Regulations and emerging national policy.

The requirement to demonstrate how sustainable development principles have been incorporated in the design sets thresholds that are too low and could be challenging for small developments to incorporate – in particular points vii – xii. This threshold should be increased to major planning applications only.

Furthermore, the EUI policy is inconsistent with the London Plan and therefore premature in advance of the London Plan Review.

As set out in the LPA CWG reps, the Written Ministerial Statement made on 13 December 2023 addresses the change in Building Regulation Part L (2021) which set national minimum energy efficiency standards.

It states that:

‘The Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.

Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale...’

It goes on to state that:

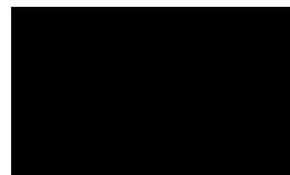
‘To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one.’

The current approach adopted in the draft Local Plan does not include ‘well-reasoned and robustly costed rationale’ and is therefore inconsistent with national and regional policy and therefore unsound.

Policy CC2 - Prioritising the Retention of Existing Buildings

Policy CC2 introduces additional requirements for applicants to undertake a condition and feasibility assessment to understand the re-use potential of the existing buildings. The policy also includes a requirement for the applicant to explore a range of alternative uses, to demonstrate the best use of the site.

We consider that financial viability should be specifically referenced within the wording of the policy and supporting text. Delivering the development which is encouraged in the development plan is reliant,



primarily, on investment from the private sector. In many instances, the commercial return associated with some of the potential development options, particularly in relation to retrofit and substantial refurbishment is likely to be simply too low to encourage developers to pursue these approaches. This is because, for example, these approaches can involve complex and extensive physical works which are costly, but they also often result in the provision of lower value or compromised space which attracts lower rents.

This is especially relevant as planning requirements have become more complex over time, increasing the range and complexity of requirements which development needs to address in order to reduce the risk associated with a planning application, which itself is required to ensure investment to support development. This is not currently acknowledged at all in the policy wording, despite being one of the main barriers to the delivery of development which is promoted by the Development Plan.

Reviewing and testing all alternative options and permutations is likely to be prohibitively complex and expensive. The design work required would be very extensive. The time, costs and complexity of this may prevent some proposals from being considered and discourage potential investment, contrary to the strategic objectives of the Plan.

Therefore, whilst the objective of the policy is recognised, it is overly complex and will produce uncertainty in the planning and development process. In the Knowledge Quarter, where growth is strongly supported, it is not likely to prove effective nor is it in general conformity with national and regional policy. The policy needs to be reworded, to address the concerns raised above or removed in its entirety.

Policy CC3 - Circular economy and reduction of waste

The Policy requires developments to optimise resource efficiency, while facilitating adaptability and deconstruction. As set out in our Regulation 18 representations, the policy and supporting text should acknowledge that designing for adaptability and deconstruction can add materials and up-front embodied carbon.

Whilst we welcome the recognition of the benefits of temporary storage banks and the sharing of information via a database, this should be undertaken at a London-wide level through existing platforms, rather than through local planning policy.

Policy CC4 - Minimising carbon emissions

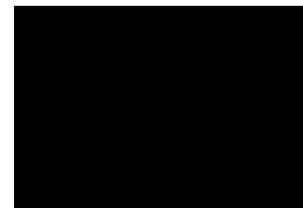
The draft Policy states that developments should aim for the GLA aspirational benchmarks, and as a minimum meet the GLA WLC standard benchmarks. We support the principle of setting targets for developers and welcome the recognition in para. 8.51 and 8.52 that these benchmarks set a range, however it should be noted that these targets may not always be achievable depending on the typology of the development and should therefore be applied flexibly, with supporting evidence where benchmarks cannot be met.

Policy CC5 - Sustainability Improvements to Existing Buildings (Retrofitting)

The policy requirements in policy CC5 are too prescriptive and whilst it is recognised that these should be 'appropriate to the scale or nature of the proposal,' further guidance on the scale of proposals to which policy CC5 would be applicable should be provided, to ensure the policy is sound.

Policy CC6 - Energy Use and Generation of Renewable Energy

The policy requirements in policy CC6 are too prescriptive and in some cases unachievable.



For example, Part A states the Council will expect all new buildings and developments where some existing built fabric is retained to meet the requirements set out in parts 1-4. It should be recognised that where parts of the building are being retained this will be more challenging to meet the requirements set out in this policy and is in conflict with other aspirations in the document which seeks to prioritise reuse of buildings.

Part C of the policy sets out the proposals for works to an existing building, which is too prescriptive and would not be viable for some developments to meet, we therefore suggest this part of the policy is removed.

The policy states that where a development is unable to achieve the quantity of renewable energy generation on site, LBC will expect an offset payment which should be related to the scale of the shortfall, subject to viability.

The offset payment is, however, currently inconsistent with the London Plan. There is no guidance on how this offset payment would apply to referable applications where the GLA adopt a Part L model. The supporting text states that the offset payment is based on the cost of providing that capacity if the space had been available. The rate is based on the cost of deploying a certain type of renewable energy system, rather than the cost of offsetting carbon emissions, which is the ostensible purpose for which the s106 funding is being collected. This element of the policy is therefore unsound and should be removed.

Policy CC8 - Overheating and Cooling

Part 4. states that where the need for active cooling is demonstrated to the Council's satisfaction, the Council will also require the carbon used to operate the system to be offset through the installation of solar photovoltaics. It should be acknowledged in this draft policy that the office market and not just specialist commercial uses is likely to still require active cooling. Passive cooling measures often add cost and disrupt the environmental controls on floor, as well as creating operational/management issues. An acknowledgement of market demands and applying policy flexibly is important in encouraging commercial development. In our experience, tenants are not using openable windows even when these have been installed on developments due to these issues.

Chapter 9: Delivering an Inclusive Economy

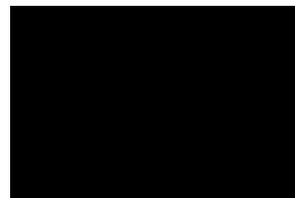
British Land continues to strongly support the principle of growing a strong, diverse and inclusive economy and enabling residents, businesses and the voluntary sector to share in the Borough's economic growth. We welcome the Plan's support to ensure a continuing supply of commercial development to deliver growth and innovation.

Policy IE2 Offices

British Land supports the overarching aims of the policy to manage and protect the office stock in the borough to ensure that suitable and viable accommodation is retained and the specific support for ensuring a sufficient supply of space for research and development. This is fundamental to the success of the Knowledge Quarter and the aspirations of the Council set out in KQ2050.

Post Covid demand is highest for best-in-class space in the most accessible locations, but demand is much weaker, and in many cases no longer there for secondary offices which are poorly located and/or fail to meet modern occupier requirements for quality, flexibility and sustainability.

The reduction in the length of the marketing period (from 24 to 12 months) required to justify a loss of office space is welcomed.



British Land does not however agree that consideration of discounted rents, incentives and flexible leasing arrangements (Part C 2) should be mandated by the policy. There is no planning justification for this.

While it may be feasible to reconfigure office space, if there is a lack of demand for the space, it is not reasonable for landowners to invest in reconfiguring a building which is not fit for purpose. This requirement should be deleted.

Notwithstanding the floor area, (part D) if it can be successfully demonstrated that there is no demand for office accommodation, then there is likely to be no requirement to provide affordable workspace. Reference to the provision of affordable workspace should be deleted. If it is to remain, there should be clarity on the quantum of affordable workspace required.

Reference to premises which cannot lawfully be leased due to their energy efficiency performance requirements is welcomed.

Part D also states that states that where the Council is satisfied that a continuing office use is no longer feasible, the preferred alternative use is housing. We suggest this is deleted as, in many cases, such as in the CAZ or KQ, housing may not be the best use of the site.

Policy IE4 - Affordable and specialist workspace

There is no justifiable evidence base to support the requirements set out in Policy IE4 and we suggest this is reworded.

We note that Draft Policy IE4 A 2 seeks a working benchmark of 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years and specifically that it is recognised in para. 9.65 that this will be applied on a case-by-case basis. We consider the 20% benchmark is unrealistic, when the average affordable workspace delivered on schemes in Camden is usually less than 10% of the uplift in floorspace at 80% of the market rent. This policy is therefore overly onerous and imposing such benchmarks will lead to protracted negotiations, delaying delivery.

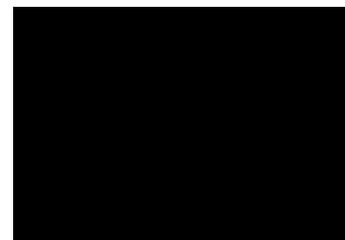
Whilst there is recognition that some specialist spaces with bespoke fit outs may be unable to meet the benchmarks (para. 9.64 and 9.65) and that priority will be given to maximising the delivery of homes rather than 'bridging the gap,' this must be stronger to allow for flexibility and enable delivery of strategic policy priorities. We suggest that viability should be considered when applying policy IE4, to avoid overly onerous requirements which hinder development or those that may result in a reduced affordable housing contribution as a result of affordable workspace requirements.

Policy IE6 - Supporting Designated Centres and Essential Services

Part 10 of policy IE6 requires that where 2,500sqm of retail floorspace is proposed, a proportion of smaller units at discounted rents should be provided. Retail floorspace is often provided as part of commercial and residential development to provide active ground floor frontages and amenity to the residents and occupiers of the building. Requiring smaller units and discounted rents is likely to impact the overall viability of the development and reduce the amount of affordable housing and/or other public benefits that can be provided and is not justified by the evidence base. This is contrary to the Development Plan's strategic objectives, and should be removed.

Chapter 12: Design and Heritage

Camden's unique character and identity is what makes it the place it is today which is an attractive place to live, work and visit. We strongly support the Council's aspirations for good design that supports that character.



Policy D1 - Achieving Design Excellence

We support 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.

Part C (2) states that where public spaces are provided as part of developments the Council will require that these spaces celebrate and reflect the diversity of the communities they are within through high quality interpretation, events, public art and decorative features codesigned with local people. Whilst there may be instances where co design is appropriate, we are concerned with this being a requirement of policy and this reference should be removed.

We also support the recognition of how the design of public spaces, and the materials used, is important and welcome that spaces around developments should be considered at the same time as the developments themselves. Where improvements to spaces around developments are proposed as part of the planning application these improvements should be recognised as public benefits and given appropriate weight in the planning balance.

We welcome the opportunity to comment on the draft Local Plan and we would be happy to provide additional information on any of the points listed above.

Yours faithfully



Michael Meadows
Head of Planning and Public Affairs

Date: Fri, 27 Jun 2025 15:25:05 +0000
From: Eloise Farmer
To: PlanningPolicy
Subject: Fwd: Formal Objection to Site Allocation C27: Land East of Constable House, Adelaide Road

To: Camden Council Planning Policy Team
Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)

We submit this representation on behalf of the [redacted] representing residents of [redacted] [redacted postcode] - located directly opposite the proposed site - to object in the strongest possible terms to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is *unsound*, as it fails the key tests of *justification*, *effectiveness*, and *consistency with national policy* set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. It is currently managed as part of the "Communi-trees" community greening initiative. While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private outdoor areas.

Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents. The loss would be contrary to:

- **NPPF Paragraphs 99-101** (protection of open space);
 - **London Plan Policy S4** (ensuring sufficient play and informal recreation);
 - **Camden Local Plan Policy A2(e)**;
 - Case law (e.g. *Copas v Royal Borough of Windsor and Maidenhead [2001] EWHC Admin 548*) confirming informal community land requires robust justification prior to redevelopment.
-

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise

immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

- **Camden Planning Guidance on Amenity (2021)**;
 - **Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c)** - sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
 - **Article 8, European Convention on Human Rights** (right to respect for private and family life);
 - *Moore v SSCLG [2013] EWCA Civ 1194* - established that mutual amenity impacts must be weighed in Traveller site cases.
-

3. Flood Risk - Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden's 2021 surface water flood data as subject to risk. Traveller pitches are considered a "Highly Vulnerable Use" under Planning Practice Guidance (PPG).

The proposal therefore fails the sequential and exception tests required for flood-prone locations, and is in breach of:

- **NPPF Paragraph 167** (requiring development to be appropriately flood resilient);
 - **PPTS Paragraph 13(g)** - sites must not be at high risk of flooding;
 - Precedent: *APP/B5480/A/11/2151483 (Romford)* - Traveller sites refused on similar flood vulnerability grounds.
-

4. Access Constraints and Undeliverability

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable.

This constraint breaches key policy requirements: - **Manual for Streets (DfT, 2007)** - minimum access width standards; - **PPTS Paragraph 13(b)** - sites must be accessible and deliverable; - **Equality Act 2010** - provision must not create unequal or unsafe conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 parcels. Following Camden's internal filtering, only **two sites** were proposed for allocation in the Regulation 19 Draft Plan. However:

- The **selection rationale** for these final sites is **not provided**, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- The allocation of Site C27 **was not disclosed** during earlier consultation rounds. Residents were only made aware of its

selection in the May 2025 Regulation 19 Draft, undermining effective participation.

This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and risks procedural unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM's methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly applied filters that would exclude sites: - Within 18m of 4+ storey buildings (overlooking); - Used as amenity or play space; - At risk of surface flooding; - Without safe vehicular access.

Site C27 presents **all four** of these exclusionary criteria and should not have progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

The failure to explain why 19 of the 21 shortlisted sites were rejected while Site C27 was taken forward is problematic. The Site Selection Topic Paper (April 2025) notes that many were excluded due to existing use, access, or amenity conflict - all of which apply equally (or more severely) to Site C27.

The absence of a robust comparative analysis or scoring matrix raises concerns about the objectivity and soundness of the site selection process. The plan has therefore not met the NPPF tests of: - **Justification** (why this site over others); - **Effectiveness** (deliverability); - **Consistency** (application of methodology).

Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to: - The loss of essential amenity space; - Inherent flood, privacy, and access constraints; - A flawed and opaque site selection process.

We therefore respectfully request that: - **Site C27 be removed from the Camden Local Plan submission draft**; - The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Responder 612

Date: Fri, 27 Jun 2025 15:25:50 +0000
From: Morris, Joel (Maidstone) GBR
To: PlanningPolicy
Subject: HMUK Representation to Camden Local Plan Consultation

This e-mail and any attachment transmitted with it are confidential and are intended for the named person's use only. The contents of the e-mail may contain sensitive and private or legally privileged information. If you have received this e-mail in error, please delete it (and any attachment) from your system and notify the sender immediately. You should not retain, copy or print the contents of this e-mail (or any attachment) nor should you, directly or indirectly, disclose or distribute the contents to anyone.

For information about how we use your personal data at Heidelberg Materials UK, including your rights, please see our [privacy policy](#).

Hanson Quarry Products Europe Limited (registered no. 300002), Hanson Packed Products Limited (26306), Hanson Aggregates Marine Limited (485700), Hanson Marine Limited (545217), Castle Cement Limited (2182762), Civil and Marine Limited (2301423), Midland Quarry Products Limited (3173418), A1 Services (Manchester) Limited (4962016), Smiths Concrete Limited (580634), Calumite Limited (948298), Hanson Limited (4626078) and Irvine-Whitlock Limited (870262) are incorporated in England and Wales with registered office, Second Floor, Arena Court, Crown Lane, Maidenhead, Berkshire, [redacted postcode] and are members of the group headed by Heidelberg Materials AG.



Planning Policy Team

Camden Council
5 Pancras Square
London
N1C 4AG



27th June 2025

RE: Regulation 19 Consultation on the Draft New Local Plan for Camden Council

Dear Sir / Madam,

This representation is submitted on behalf of two group companies trading under the name Heidelberg Materials UK at the York Road Goods Yard (Freight Lane):

Hanson Quarry Products Europe Limited which operates the concrete batching plant and the joint aggregate storage facility identified by an orange boundary on the attached plan

and

Castle Cement Limited which operates the cement rail terminal identified with a blue boundary on the attached plan

Background

For ease of reference in this representation these two companies are referred to as 'HMUK'.

The address of the sites is Kings Cross Goods Yard, Freight Lane, London, N1C 4BE, as shown on the attached plan where the blue boundary denotes the cement business and the orange boundary denotes the concrete/aggregate business. The joint aggregate storage building is shared with Tarmac.

HMUK has operated at this site since the early 2000's. The extant permission for the cement terminal, PEX0000195, is unrestricted in terms of operations. A supplemental permission, 2011/4133/P, has a noise restriction at condition 3.

The extant permission for the concrete batching plant is 2004/0843/P. Like the adjoining Tarmac concrete batching plant, the HMUK concrete plant has a restriction on operating hours at condition 3 stipulating there is to be no operation between 22:00-06:00 except for 30 nights per year.

Cement and aggregates are imported to the site by rail. Cement is loaded into the silos adjoining the rail siding where it is stored awaiting onward transport by road. As and when required, the cement is loaded

into road tankers for delivery to various concrete batching plants throughout London and sometimes further afield. Of course, cement is transported to the adjoining concrete batching plant. This is a 24 hour operation involving the use of machinery such as air compressors that do make noise.

The aggregates are transferred over a series of conveyors from the rail siding to the joint stockpile, which is shared with Tarmac. The sand and stone is stored until it is called for in the manufacture and batching of ready mixed concrete, at which point it is discharged onto further conveyors taking the aggregates to the concrete batching plants. This operation generally takes place during the day but, as it is rail dependent, there are times when unloading must take place at night due to breakdowns on the rail network.

The concrete batching plant usually operates during daytime hours but there will be occasions when it is necessary to work at night, usually to serve transport related projects such as highways repairs and road building. Generally, this happens at least once a month.

Representation

1. HMUK's sites fall within an aggregate safeguarding area in the adopted Camden Local Plan meaning that the operations should be protected from encroaching development that would adversely affect the economic viability of the safeguarded rail depot.

This representation requests that adequate mineral safeguarding policies are set out in Camden's new local plan and that HMUK's sites at Kings Cross are safeguarded against inappropriate development that would adversely affect the lawful operations.

The local plan should contain policy to elaborate on the means of how the aggregates rail depot will be safeguarded in accordance with the London Plan and national Policy.

2. HMUK is particularly concerned to see that two nearby sites are proposed for mixed use development, being site allocations S6 and S20. In both cases, it is the residential element of the proposals that is of concern because it would bring sensitive receptors to the source of potential nuisance. Specifically, residents of new dwellings proposed at these sites are likely to be disturbed by noise from the nighttime unloading of aggregates and cement.

In the case of site allocation S20, in addition to potential noise disturbance due to operation of the sites, there would be disturbance due to the movement of HGVs along Freight Lane both day and night. Indeed design principle no.9 for S20 proposes the improvement of conditions for pedestrians and cyclists along Freight Lane. This would be inappropriate due to the industrial nature of the road as the only means of vehicular access to the safeguarded rail depot. It is heavily used by HGVs at day and night hence

Conclusion

The HMUK sites at Freight Lane make a valuable contribution to the local economy (via construction) while using rail for sustainable delivery of heavy materials and taking many thousands of HGVs off London's roads. The safeguarding policy within the proposed local plan should be strengthened to provide clarity for both operators and developers.

The residential development that is envisaged at site allocations S6 and S20 would be incompatible with the operation of the safeguarded cement and aggregates rail depot at Kings Cross because it would bring sensitive receptors very close to existing safeguarded operations.

HMUK calls for the removal of the proposed housing capacity of 750 self-contained homes in site allocation S6, and of 210 self-contained apartments in site allocation S20.

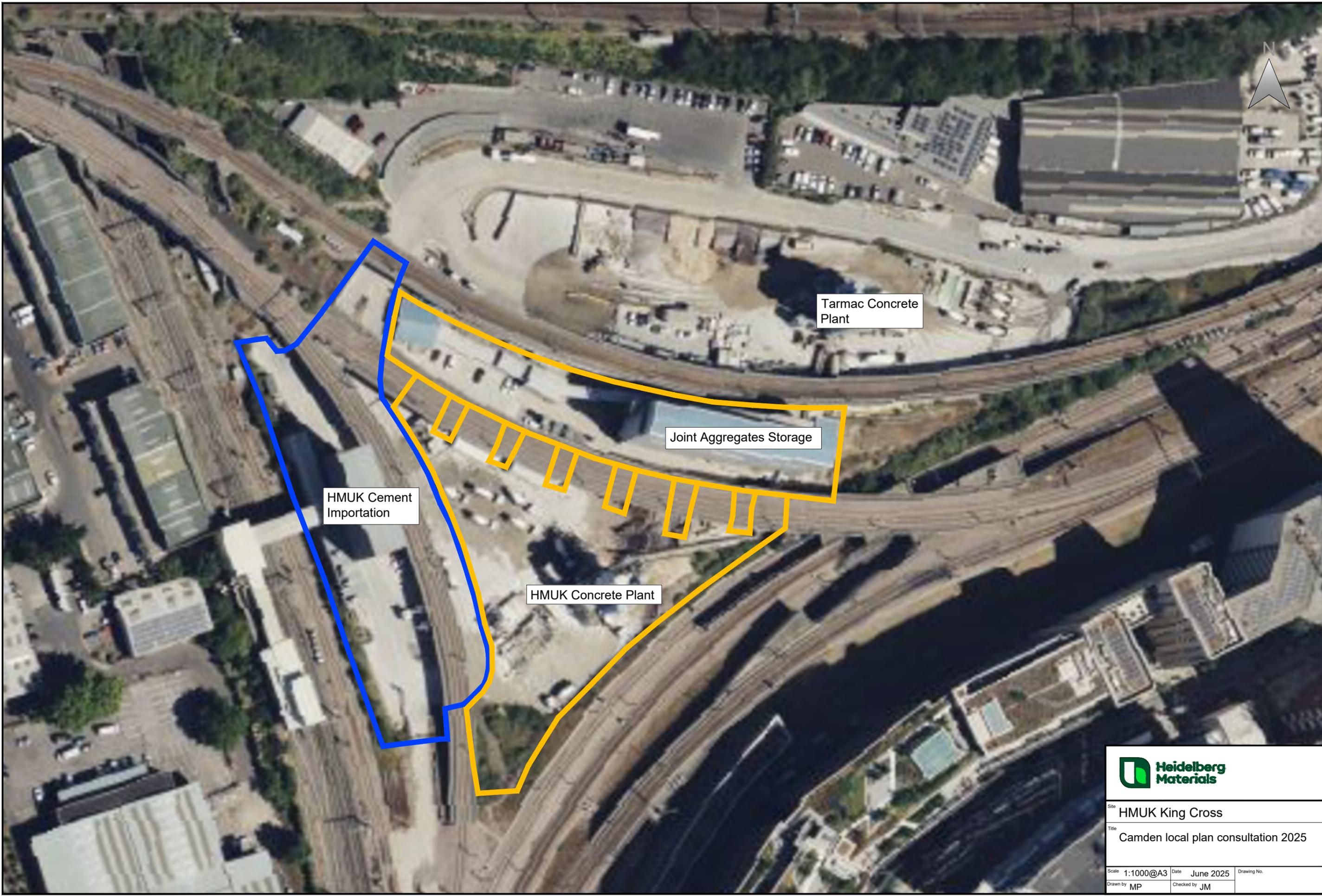
The proposal within site allocation S20 for the improvement of Freight Lane for pedestrians and cyclists is incompatible with the existing heavy industrial nature of the road as the only means of vehicular access to the safeguarded rail depot. This should be removed.

Yours faithfully,

Joel Morris



Heidelberg Materials UK



Tarmac Concrete Plant

Joint Aggregates Storage

HMUK Cement Importation

HMUK Concrete Plant



Site		
HMUK King Cross		
Title		
Camden local plan consultation 2025		
Scale	Date	Drawing No.
1:1000@A3	June 2025	
Drawn by	Checked by	
MP	JM	

Date: Fri, 27 Jun 2025 15:30:57 +0000
From: Iain Macintosh
To: PlanningPolicy
Subject: Relocation of Regis Road Recycling Centre

Dear Sir or Madam,

My sincere apologies for the brevity and informality of this message, but like many Kentish Town residents, I only discovered very recently that the council plans to move the Regis Road Recycling Centre (or 'dump' as we'd colloquially refer to it) from its perfect current position, right into our neighbourhood.

This is insane. The proposed site is a stone's throw from a primary school. The smell and the noise will dramatically reduce the quality of life for hundreds of unsuspecting families. The damage to property prices will be savage, indeed we're told that many people would find it impossible to renew their mortgages and would likely lose their homes.

We look to Camden Council to protect our interests, not to betray our trust. I urge you to reconsider this act of madness and I promise you that the residents here will oppose this redevelopment in the strongest possible manner.

Regards

Iain Macintosh

Date: Fri, 27 Jun 2025 15:33:18 +0000
From: Planning
To: PlanningPolicy, Barry Dawson
Subject: FW: Objection to proposed use of Site C27: Chalk Farm - Gypsy and Traveller accommodation site.

-----Original Message-----

From: Steven Hurwitz <[redacted email]>
Sent: 27 June 2025 16:24
To: Planning <[redacted email]>
Cc: [redacted email]

Subject: Re: Objection to proposed use of Site C27: Chalk Farm - Gypsy and Traveller accommodation site.

[You don't often get email from [redacted email] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Re: Site C27 - Land East of Constable House, Adelaide Road, for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). Policy H11, pages 294-5.

Dear Planning Officer,

I am afraid I need to voice my objection to the above proposal on the following grounds:

The site in question is totally unsuitable being on a major thoroughfare which also has a great deal of footfall due to the proximity of Chalk Farm Underground station not to mention the spillover of pedestrians many evenings (particularly in summer) from Primrose Hill park.

It is a tiny oasis of green much appreciated by local residents and where children play.

Surely, such a site would be more suited to a quieter area with a larger space for caravans to park and families to live?

This proposal, as far as I know, has not been widely circulated and I only got to hear about it by chance. I am not confident whether all the residents in the area have been fully notified of this proposal and have had the opportunity to object.

I respectfully ask you to reconsider this proposal and find an alternative space to house the Gypsies and Travellers if you are under a legal obligation to do so.

Thanks and best regards,
Steven Hurwitz

Responder 615

Date: Fri, 27 Jun 2025 15:34:03 +0000

From: Ian Grant

To: PlanningPolicy

Subject: Kentish Town Neighbourhood Forum Response to Local Plan

Please find attached Kentish Town Neighbourhood Forum's response to the Camden Local Plan put together by several members of the committee.

Thanks

Ian



KENTISH TOWN NEIGHBOURHOOD FORUM RESPONSE TO THE CAMDEN LOCAL PLAN – JUNE 2025

01 Introduction:

We like the fact the Local Plan is driven by the missions in We Make Camden and the six ambitions, three key missions – young people, food and estates and neighbourhoods and the six challenges: Safety, Digital, Loneliness, Housing and Climate emergency. We also like the use of the Good Life Camden Framework tool, which attempts to consider the wishes of the Camden population and a means to measure success in achieving it.

Given the number of overlapping policies, and potential conflicts as to which has preference over the others, the fact there is a clear and simple menu to return to, cannot be overestimated.

The council's aim to maximise the opportunities that exist for providing new and affordable homes, and jobs, and the infrastructure required to support this, 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 is a laudable ambition.

But KTNF notes that it will not be easy to achieve the ambitions in the plan and to overcome the challenges identified in the draft against the background of the current economic climate.

KTNF is pleased to note that the draft Plan supports several priorities in the Kentish Town Neighbourhood Plan, including protecting local jobs and increasing the supply of affordable housing and the following policies: SW1: Supporting small businesses; GA: Step-free access in Kentish Town stations; GO1: Local green spaces; GO2: Open spaces on estates; and SP2: Kentish Town potential development area.

A clearer explanation how the plan will adapt to radical changes in planning policy we think is necessary. For example, there is a section on Duty to Cooperate, which has changed after the production of this document.

We like the fact 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 or thematic policy and strategy supports another.

However, 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. 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.

This includes the mission: “By 2030, Camden’s estates and their neighbourhoods are healthy, sustainable and unlock creativity.”

Whilst the draft document goes on to explain approaches to the attainment of healthy and sustainable neighbourhoods, the idea of “creativity” needs more development.

02 Development strategy

2.8 “The Local Plan seeks to maximise housing supply in Camden based on the delivery of available 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).”

KTNF is concerned that the current percentage of the target from the Housing delivery test (2023) is running at 53%. The plan should include measures to address shortfalls in future, to avoid being directed by the Secretary of State.

2.13. Jobs: KTNF notes that commercial to residential applications are running at 62% and that nearly a third of commercial space applications result in successful appeals.

2.16 Spatial strategy: KTNF likes the clarity of approach: The Council's overarching spatial strategy which shows key areas of development and Council-led regeneration schemes, together with town centres, the Central Activities Zone (CAZ) boundary, CAZ retail clusters, the borough's industry area, key stations and main open spaces.

2.20 KTNF supports the policy of an area-based approach to support and guide the delivery of new development in the borough, and the focus on the sub-areas of South Camden, Central Camden, West Camden, and North Camden.

Policy DS1 Delivering Healthy and Sustainable Development. KTNF notes the ambitions here are laudable, but there are numerous demands on a limited amount of space, and in practice compromises will be necessary. Some guidance on how priorities will be decided where there are potential conflicting demands would be useful.

DS1 B KTNF welcomes the fact the Council is seeking contributions from major developments towards the Council's Citizen Scientist community research programme to monitor the impacts of development.

2.30 KTNF welcomes the fact that the Council wants developers to consider the effects of the development on deaf, disabled, neurodiverse, gender diverse, the elderly, women, and children.

2.31 KTNF welcomes the guidance to developers to consider their plans with regards to other sections including sustainability, housing, access, communities, transport and the natural environment.

2.32 KTNF thinks the promotion of mixed-use developments is a sensible policy given the limited space available.

2.33 KTNF welcomes the stress on Place Making and the fact that the Council will expect developers to take a comprehensive approach to site design and layout, to optimise development potential across the whole site and wider area.

2.34 KTNF welcomes the fact that on adjoining sites and those with multiple ownership the council expects developers to work together to bring forward coherent and integrated development proposals for the whole area. This could be achieved by the preparation of a joint masterplan.

2.36 KTNF applauds the use of the citizen science pilot which will deliver community-based, practice-led research training in social science methodologies at UCL Citizen Science Academy for Camden residents. Particularly noteworthy is the training for residents to develop neighbourhood profiles and identification of community needs and priorities. One of the previous criticisms, about lack of monitoring, looks to be addressed with the State of Borough Report and Good Life Camden reporting.

General point: KTNF, notes the chapter mentions incorporating measures to reduce flood risk but requests that the council includes more information on avoiding impermeable surfaces in the Development Strategy to allow rainwater and surface water to drain and reduce flooding.

04: SITE ALLOCATION – Central Camden

Policy C1

Retail and Town Centres

M "The Council will continue to support and protect the town centres of Camden Town and Kentish Town, and the Neighbourhood Centres in the Central area of the borough, to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors in line with the retail policies in the Plan, with any additional shopping and leisure uses to be provided in accordance with Policy IE6 (Supporting Designated Centres and Essential Services)."

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 encouragement on the use of pop-ups and meanwhile space is needed to offset non-used frontages.

N "Camden Town is also a key focus of the evening and night-time economy in Camden, and the Council will support efforts to widen the range of evening and night-time economy uses here, particularly where this will benefit local residents and people working night shifts, in line with the objectives set out in the Council's Evening and Night-time Economy Strategy."

Camden Town's economy is increasingly straying into Kentish Town, which has positive and negative impacts. This policy needs a clause (besides the standard licensing procedure which most people aren't aware of) relating to guaranteeing consultation with residents over licensing times and night-time noise.

O Infrastructure

1 “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.**

5 Eastern access to Gospel Oak Overground. **The plan needs to be more specific on what type of access.**

8 Public realm improvements in Kentish Town Centre. **More details are required.**

14 “The delivery of an integrated care hub.” **This needs more explanation. A previous proposal proved controversial.**

15 “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.**

18 “The delivery of the Heath Line, a new green connection between Hampstead Heath and Kentish Town.” **This needs more clarity about the route and possible alternative green routes if the Murphy site is not developed within a specific time frame.**

19. “The delivery of the Camden Nature Corridor, which aims to deliver a nature rich green corridor from Hampstead Heath into Kentish Town through improvements to a chain of five Sites of Interest for Nature Conservation (SINCs) and their connection through green infrastructure established across future development on site allocations at Murphy’s Yard, Regis Road and West Kentish Town Estate;” **KTNF fully supports the Camden Nature Corridor.**

23. The provision of infrastructure for supporting local energy generation. **Should include the clause: renewable wherever possible.**

General point: 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, as previous experience has proved.

ALLOCATION C2 (KT2): Regis Road and Holmes Road depot

Development and design principles

4. “Ensure that non-employment uses do not compromise the operation of employment uses”; **KTNF thinks this is a useful clause with a general tendency for other uses to encroach into employment space.**

11. KTNF welcomes: “significantly improve connections both through the site, and between the site and the surrounding area, to promote active travel and ensure that the site is successfully integrated into the wider Kentish Town area;”

18. “Enhance biodiversity corridors along the railway lines to the north and northwest of the site, (which are a designated Grade I Site of Important Nature Conservation) in order to support biodiversity and create and improve connections for wildlife to support the delivery of the Camden Nature Corridor”; **KTNF fully supports The Camden Nature Corridor.**

21. “Explore the provision of temporary (meanwhile) uses on the site to maintain activity as a comprehensive scheme is progressed. The Council will expect a meanwhile use strategy for this site to be submitted as part of plans for comprehensive development, in line with considerations set out in the Kentish Town Planning Framework;” **KTNF welcomes this approach, but the council must have a mechanism whereby if a request is turned down, as has happened in the past, it is with justifiable reason.**

23. “Retain or re-provide the Regis Road Recycling Centre and other Council service provision, as necessary, unless suitable compensatory sites are provided elsewhere that replace the existing service provision. The continuous availability of services must be maintained in all circumstances. Re-provision of the Recycling Centre must replace the maximum throughput achievable at the existing site;” **KTNF suggests it should specify that redevelopment includes additional space to meet the growing needs of the circular economy and creation of more employment.**

KTNF notes that in the consultation on Regis Road last year retention of the Recycling Centre came second out of 20 for the infrastructure developments that people selected when asked for their top five priorities.

24-28 KTNF welcomes the plans for cycle and pedestrian routes through the site, but thinks pedestrians need more protection from cyclists.

33 KTNF welcomes the clause: “contribute towards improvements at Kentish Town Thameslink and Underground station (including the provision of step-free access, a new station entrance and an enhanced town square)” **as this is a central part of the KTNF Neighbourhood Plan. However, the Plan needs to clarify how it would be funded.**

The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 52 m considered the potentially appropriate height range.” **Building height was a significant issue in the community's rejection of the previous plans for the Murphy site and it is very likely that 52m is too high for community consent here. Medium density is our preferred approach and design layouts should attempt to move towards this ambition. Medium density in many cases has been proven to create an equal number of homes than taller buildings in a smaller footprint.**

ALLOCATION C3 (KT3): Murphy Site

General Comment: KTNF notes that the heights proposed in the previous planning application drew many objections from the local community. Even the Design Review Panel said the tallest should be reduced by up to two storeys. KTNF prefers medium density and the space available on the Murphy site should allow plans to approach this goal.

There needs to be more consideration for pedestrians in routes through the site, particularly for disabled people and elderly, and especially with the rise in popularity of e-bikes and scooters.

The amount of accommodation on the site needs to be fixed. Previous plans have shown numbers as high as 2000 for the Regis Road and Murphy sites. We regard the 750 figure as a maximum, otherwise the buildings increase in size, or the accommodation units get smaller.

KTNF has expressed concerns over the impact of the population increase on the surrounding transport network, and whether it can cope, or whether more services may be required. Further studies are required.

There is no commitment to the provision of a specific breakdown of types of affordable housing accommodation.

In terms of sustainability, how are materials from existing buildings going to be reused, how are materials to be sourced, how is carbon assessment to be applied?

27 “Explore the provision of temporary (meanwhile) uses on the site to maintain activity as a comprehensive scheme is progressed.” **Developers need incentives to provide the space as previous history shows they are often reluctant to do so. ‘Meanwhile uses’ should also be free to some community groups.**

ALLOCATION C4: Kentish Town Police Station

2. “Ensure that the introduction of other uses on the site does not compromise police operational requirements”; **KTNF is concerned that if the Recycling Centre is moved to part of this site, it could compromise requirements. KTNF has said the Recycling Centre should be expanded in line with circular economy principles and creation of more green jobs.**

4. “seek to retain the Section House building in accordance with Policy CC2 (Retention of Existing Buildings) and re-use to provide student accommodation.” **KTNF thinks there is too much student accommodation already outlined in the Local Plan.**

KTNF does not support the Police Station or its Car Park being used as a location for the Recycling Centre.

Wherever the Recycling Centre is located, KTNF strongly requests that there is no vehicular access from Holmes Road, which would be completely unsuitable for this kind of traffic, given that it has substantial housing and a heavy footfall of pedestrians to and from two schools (St Patrick's and CFBL), student halls of residence, studios and the Stay Club. This footfall is likely to increase with the advent of the new hotel planned above McDonald's. Vehicular access from Regis Road would be far safer and more suitable.

ALLOCATION C5 (KT5): 369 – 377 Kentish Town Road

General point: KTNF requested a clear route with a new ramp to be built alongside the railway lines. The ramp provides both the physical and visual entrance to the entire scheme.

ALLOCATION C6 (KT6): Kentish Town Fire Station

1 “Optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply).

Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation); The Plan needs to specify what is meant by “alternative community use”. KTNF suggests that the Council

keeps a watch on the supply and demand for these “alternative community uses”. **KTNF prefers affordable housing over and above student accommodation.**

6. “Retain existing trees and provide suitable new planting and landscaping.” **KTNF requests that the existing planters which have been created through community effort over the last six years, be retained.**

07 – Meeting housing needs

Disappointingly short on affordable homes

KTNF welcomes the Plan’s clear statement that the absolute priority in how to use land in Camden is to create permanent self-contained housing. Furthermore, the Plan supports the London Plan’s target that 50% of new homes should be “genuinely affordable”.

Unfortunately, KTNF is disappointed that this affordable target translates into a mere 26% once viability is considered.

In the 15 years to 2041 that the Plan covers, it is hoped 11,550 new homes will be created.

However, the Plan goes on to say that the council’s target for affordable homes in this period is “to meet or exceed” 3,000. This is considerably short of what an average resident would expect 50% means – namely 5,775. As an explanation of sorts, the Plan says in section 7.106: “To set this plan’s target for affordable housing we have taken the overall housing target..., and estimated the maximum number of affordable homes likely to be viable and deliverable... Balancing these considerations, this plan sets a delivery target of 3000 additional affordable homes over the plan period (200 per year).”

Considerations of viability and deliverability tell developers from the outset that 50% does not mean 50%. It means 26%, which is a very disappointing target in a situation where affordable housing is desperately required. The extent of the need in Camden is proven by research in 2016 that shows that 60% of overall housing need is for affordable homes, which illustrates the huge gap that has persisted for years and will continue to persist for the next 15 years.

Protecting residential floorspace – including student accommodation

Policy H3 outlines that permanent residential floorspace where people live long-term i.e. more than 90 days is protected. This includes, to name the most important categories, individual self-contained houses and flats, live/work units, HMOs shared by 3 to 6 occupiers who are not related but share facilities, housing for older people and student accommodation.

The latter is something that a reader notices throughout the Plan. Student accommodation is mentioned as something that should be encouraged and supported and set on the same level as housing for people with care or support requirements. Student accommodation is “considered to be residential floorspace” therefore no housing contribution is required.

When we think of an existing local example of student accommodation in Kentish Town, the StayClub in Holmes Road, the likelihood of having numerous further blocks of student accommodation across the borough is frightening for neighbours – the StayClub functions more like a hostel than accommodation for students for a full term or an academic year as continuously new groups of teenagers arrive to stay for short periods, with all the attendant disruption for neighbours that this entails. Management plans are falling far short of what is required in real life.

Housing in mixed-use developments

Policy H2 underlines that permanent self-contained housing should be part of mixed-use developments (including hotels and other visitor accommodation but excluding student accommodation). In such developments, 50% of the additional floorspace created is meant to be for housing, but it goes on to say that off-site provision nearby, but in the borough, is possible, and payment in lieu might be acceptable. The reason given is that of neighbourhood safety as people living in the area will be around outside of office hours, and furthermore, much of the borough “already has a well-established mixed-use character” (section 7.41).

We agree with this overall aim, ideally with residential being on-site rather than off-site as having mixed tenure from the outset enables communities to be better integrated and socially cohesive.

Defining two tiers of affordable housing

Policy H4 outlines that the target for affordable housing gets split into two sections, namely a target of 60% to be low-cost rented and 40% intermediate housing. For clarity, low-cost rented is the cheapest, also called social rent, owned by councils and housing associations, with access controlled by the housing allocation scheme, and subject to national rent setting guidance. Intermediate is the next cheapest, lower than market rent and controlled by income caps in the London Plan. Larger

developments, i.e. those providing 16 or more additional homes, are supposed to meet these targets. Smaller developments will be using a sliding scale of contribution.

Welcome council tax premium – but how will it be enforced?

Laudable are the points on vacant homes. The council says it will work to return vacant homes to use and ensure that new homes are occupied – presumably the latter refers to ‘ghost towers’, situations where investors are leaving newly built homes empty rather than let them so as to protect their investment. It is estimated that 1.5% of the existing dwelling stock is vacant, i.e. 1,600 homes. To fight this, the council intends to use council tax penalties (section 7.19):

If empty for 2 years and more – 100% premium.

If empty 5 years or more – 200% premium

More than 10 years – 300% premium

It is not explained what measures will be taken to ensure new homes are occupied rather than an absentee landlord simply paying normal-level council tax while pretending to live there.

Section 7.20 says the “council will explore ways to ensure that investment homes are made available for occupation”, in other words, the council has currently no idea how to enforce this goal.

The increasing problem of highly profitable short lets

Another laudable intention is resisting the further development of housing for use as short-term lets. “Under current legislation ... planning permission is required for a residential property to be used for short-term lets ... unless the use is restricted to a total of 90 days in any one year” (section 7.22).

Data shows there are more than 5,000 entire homes being marketed for short-term lets which is a massive 4.7% of the total dwelling stock. The attractiveness of short lets to landlords is also mentioned. For 1- and 2-bedroom flats the weekly rent earned from short lets is three times as high as from a permanent tenant (section 7.22).

Even worse, the data “also shows that more than 10% of Camden’s private rented homes are offered as entire properties available for short-term lets over aggregate periods exceeding 90 days”, as mentioned in section 7.82. The Plan simply states that Camden wants to prevent year-round use of housing as short-term lets but it is entirely quiet about the methods that would be used to achieve this goal.

Residential to be the default use

KTNF believes, in the spirit of prioritising permanent self-contained housing, a rule is required to make housing the default option, or first option, if and where commercial use is no longer viable. An example is a building in Kentish Town Road for which no office tenant could be found and where permission has been granted to change use into a hotel earlier in 2025.

At this time, rules make it impossible to consider or indeed force a switch to residential. This lack of rule needs to be addressed, along the lines of the goal stated in section 7.29: “Where vacant or underused sites are suitable for housing ... we will expect them to be redeveloped for permanent housing...”

Student accommodation and neighbours’ amenity

Policy H9 relates to housing that is occupied by students during term-time, let to each occupier for not less than an academic term and is managed by an education institution or an independent provider. The minimum length of a term is usually eight weeks.

Here the goal is to “meet or exceed a target of 200 additional places per year as the minimum borough requirement” (section 7.281) and that student accommodation counts towards meeting the housing target at a rate of 2.5 student rooms being considered the equivalent to one home.

Until very recently, student accommodation has been developed free from the application of any affordable housing requirements (section 7.316), but from now on the contribution from purpose-built student accommodation is to take the form of affordable accommodation although it is not specified how much is called for.

The Plan recognises that past development of this nature has led to some unwelcome concentrations. The amenity of neighbours warrants a mention: “Where the scale or concentration of student accommodation risks harm the balance and sustainability of the community or otherwise has potential to harm local amenity, the Council will seek a range of mitigating measures such as management plans.” Furthermore, the council plans to “prevent disposal of individual rooms or flats as

independent self-contained homes” (section 7.309), something that might appear very attractive to some developers of student accommodation.

08 Responding to climate change

Positives

1. **Highly Ambitious Target:** The goal of a net-zero carbon borough by **2030** is significantly more ambitious than the UK’s national target of 2050. This places Camden at the forefront of climate action in the country.
2. **Comprehensive and Holistic Scope:** The policy doesn’t just focus on operational carbon emissions from energy use. It takes a holistic view by integrating:
 - **Transport:** Promoting active travel and EVs.
 - **Water Management:** Mandating Sustainable Drainage Systems (SuDS).
 - **Nature:** Requiring biodiversity net gain and using an Urban Greening Factor.
 - **Waste:** Embedding the principles of a Circular Economy.

This integrated approach is considered best practice.

○ By including **embodied carbon** (Policy C3) and **climate adaptation** (Policy C2), it addresses the climate crisis in a much more complete way. This prevents developers from simply shifting the carbon burden from energy use to construction materials.

3. **Focus on Whole Life-Cycle Carbon:** This is a crucial and progressive step. Many policies only address operational carbon (heating, lighting). By requiring developers to assess and minimise embodied carbon (from materials, construction, and demolition), Camden is tackling a major, often-overlooked source of emissions. This is still a relatively new and challenging area for UK planning policy.

4. **Mandatory and Measurable Requirements:** The policy uses strong language (“must” and ‘shall require’). It sets clear, measurable targets like high BREEAM ratings Excellent or Outstanding and the Urban Greening Factor score, making it less of a suggestion and more of a hard requirement that can be enforced through the planning process.

5. **Strict Energy Hierarchy:** “The Be Lean, Be Clean, Be Green” hierarchy correctly prioritises reducing energy demand first, which is the most effective and sustainable approach. Offsetting is positioned as a last resort, discouraging developers from simply paying to pollute.

6. **It is Legally Binding:** This is the single most important factor. This is not a voluntary guide or a set of recommendations; it is a core part of the statutory Local Plan. All planning applications must demonstrate compliance. This gives the policy real teeth and forces developers to take it seriously from day one.

7. **Future-Proofing Development:** The focus on avoiding overheating through passive design, managing flood risk with SuDS, and making buildings “connection-ready” for future heat networks is forward-thinking. It prevents locking in outdated, high carbon infrastructure and ensures that buildings built today will still be functional and comfortable in the climate of 2050 and beyond.

8. **Market-Driving Power:** By setting such a high bar, Camden is creating a market for green skills, technologies, and materials. Architects, engineers, and suppliers who want to work in the borough will have to upskill and innovate. This can create a positive feedback loop, making sustainable construction the new normal and potentially even reducing its cost over time as the supply chain matures.

9. **The “Be Seen” Requirement:** The mandate for post-occupancy monitoring is a game-changer. It tackles the notorious “performance gap” where buildings use far more energy in reality than their design models predict. By requiring developers to monitor and report on actual performance, the policy creates accountability and provides valuable data to improve future designs.

Weaknesses

1. **The Offsetting “Escape Hatch”:** While positioned as a last resort, the existence of a carbon offsetting mechanism can be seen as a loophole. Critics argue that it allows developers to “buy their way out” of achieving the highest possible on-site carbon reductions. If the cost of offsetting is lower than the cost of achieving the highest on-site standards, developers may

choose to simply pay the fee. The success of this element depends on the offset price being set high enough to be a genuine deterrent. Also, the real-world effectiveness of some offsetting schemes is debatable. A more radical policy might ban offsetting entirely.

2. Focus on New Developments: This policy, as part of a Site Allocations Plan, is overwhelmingly focused on **new builds**. The biggest climate challenge in a built-up area like Camden is retrofitting the **vast existing building stock** (historic buildings, post-war estates, Victorian terraces). This policy has limited power to compel private homeowners and existing businesses to undertake deep retrofits, which is essential for meeting the 2030 target.

3. Financial Viability: This is the most significant challenge. Meeting these extremely high standards can increase upfront construction costs. Developers can, and do, argue that these requirements make projects, particularly those with a high proportion of affordable housing, financially unviable. The Council will face a constant balancing act between enforcing its climate policies and meeting its housing delivery targets. This can lead to negotiations where the council may have to accept lower standards to ensure a site is developed at all. The policy's ambition can be diluted on a case-by-case basis.

4. Scope of Application: The most stringent requirements (e.g., net-zero, Whole Life-Cycle Carbon assessments) are typically applied to "major developments". While smaller developments have rules to follow, the cumulative impact of many smaller projects that don't meet the highest standards could still be significant.

5. Enforcement and Post-Occupancy Performance: A policy is only as good as its enforcement. There is a well-known "performance gap" in construction, where buildings do not perform as well in reality as they were designed to on paper. Ensuring that the buildings are built to specification and operated efficiently post-occupancy is a huge challenge that goes beyond the planning approval stage.

6. Skills and Supply Chain Gaps: The UK construction industry as a whole is still adapting to these advanced standards. There may be a shortage of professionals with the expertise to conduct accurate Whole Life-Cycle Carbon assessments or design effective passive cooling systems. Similarly, the supply chain for low-carbon materials and advanced technologies (like ground-source heat pumps) may not be robust enough yet, leading to delays and higher costs.

7. Enforcement Capacity: A policy this detailed and technical requires a highly skilled and well-resourced planning department to enforce it. Planning officers will need the expertise to scrutinise complex energy models and Whole Life-Cycle Carbon assessments. If the department is understaffed or lacks the specialist knowledge, there is a risk that substandard applications could be approved.

8. The Existing Building Stock: This is a crucial limitation. The policy is powerful for **new developments**, but new buildings only make up a tiny fraction (~1%) of the total building stock each year. The vast majority of Camden's emissions come from its **existing homes, offices, and public buildings**. While the policy encourages retrofitting during major refurbishments, it cannot, by itself, trigger the borough-wide deep retrofit program needed to hit the 2030 net-zero target for the entire borough.

9. Conclusion

No single planning policy can "go far enough" on its own to solve the climate crisis. Its ultimate success is constrained by:

- **Its focus on new builds**, leaving the larger problem of existing buildings to be addressed by other council strategies and funding.
- **The economic reality** of development viability, which can force compromises.
- **The practical challenges** of enforcement and ensuring long-term performance.

The policy pushes the boundaries of what is possible through the planning system. It effectively shifts the baseline of what is considered acceptable, forcing the development industry to innovate.

However, its success in helping the **entire borough** reach net-zero by 2030 is more limited. On its own, it is a necessary but **insufficient tool**. Achieving that borough-wide goal will depend on other, parallel policies and massive investment in retrofitting existing buildings - an area where a planning policy has much less direct control.

In summary, Camden's Chapter 8 is a gold-standard planning policy that will succeed in driving down emissions from new builds. Its ultimate success will be measured not just by the buildings it creates, but by the market transformation it inspires and its ability to work in concert with wider climate initiatives.

It goes as far as a planning policy reasonably can, but achieving the 2030 target will require a monumental effort that extends far beyond this single document, involving massive investment in retrofitting, community action, and changes in national policy.

09 Delivering an Inclusive Economy

In terms of background, Kentish Town has lost numerous employment premises in recent years on Kentish Town Road and surrounding streets. The major development plans for Murphy's Yard and Regis Road could bring long term benefits for the neighbourhood if they are planned and implemented in an inclusive way.

The need for different workspace types and sizes

9.13 "Outside of the planning process, the Council is also actively supporting businesses and social enterprises through the use of its assets and by working with other landowners and increasing access to finance, for example by the establishment of a community wealth fund." **KTNF supports this. Kentish Town has a diminishing supply of suitable premises due to factors such as permitted development rights.**

Reducing resource consumption

9.19 "Businesses have an important role in tackling the climate crisis as funders and occupiers of development, through the sharing of knowledge, and by working in partnership with others. The Council will therefore expect proposals to embed low impact approaches to the design, operation, and servicing of buildings in line with the Local Plan's climate change policies. Employer participation in local climate action will be strongly encouraged. We will prioritise the retention and extension of genuinely redundant offices where this can provide good quality housing in line with Policy IE2 (Offices) and CC2 (Retention of Existing Buildings)." **KTNF notes the integrated approach here, linking different policy areas and advancement on the previous local plan.**

Camden's industrial land supply

9.44 "Around half of Camden's industrial land supply (about 18 hectares) is occupied by distribution/ logistics depots. These have traditionally tended to be land-hungry uses with extensive areas of vehicle parking. The Local Plan's transport policies support a shift towards more sustainable, 'last mile' delivery operations based on consolidation and use of smaller, lower impact vehicles, including cargo bikes. There is likely to be scope to reduce the footprint of distribution/logistics uses and find alternative and complementary uses on some sites, subject to the needs of the Central Activities Zone continuing to be met."

KTNF welcomes the aim of reducing the footprint of distribution / logistics depots, which occupy about half of Camden's industrial land supply (c.18 ha.), including in Kentish Town. These land-hungry uses with extensive areas of vehicle parking provide relatively few jobs per square metre, which tend to be of poor quality with few prospects. We welcome the move to last-mile deliveries which should reduce the land take of the depots.

Affordable workspace

9.59 "Policy IE4 sets out the need for larger employment schemes to contribute towards the delivery of affordable workspace." **KTNF welcomes this policy given the lack of affordable workspace in Kentish Town.**

9.99 "When there are vacant premises in centres, particularly outside of the primary areas or in neighbourhood centres, this can provide an opportunity to introduce new uses and activities that benefit local communities, especially where startups, entrepreneurs and voluntary, community sector and third sector organisations can struggle to secure premises at rents they can afford. Examples include affordable workspace, circular economy uses (such as repair shops), artist studios and cultural activities. The Council will support the reuse of premises as 'meanwhile uses' in line with Policy IE1 (Growing a Successful and Inclusive Economy). We will give priority to proposals that can demonstrate a social, cultural, or economic development benefit." **KTNF wholly supports this approach.**

Design and environmental quality

9.110 "New shop fronts will be expected to respond closely to the prevailing scale, form, proportions and materials." **KTNF thinks that shop windows should be kept clear of excessive advertisements and particularly film which may cover a large percentage of the shop front window. This blank face disrupts the vitality of the high street and reduces the interaction between the street and commercial units. Where a degree of privacy is required (beauty salons etc) non-full height internal screens would be preferable, to allow the depth and scale of the shop unit along with its lighting and services to be visible from the street. No oversized shop signage should be allowed on the high street and in particular in back and side streets and industrial estates.**

Hot Food Takeaways

1E7: There has been a proliferation of dark kitchens in the Regis Road industrial area which causes severe noise and traffic nuisance to residents. KTNF welcomes Policy IE7 but thinks it should go further. The policy outlines future proposals, and not anything about the kitchens which already exist.

KTNF appreciates the development of the policy but within that it wants the Council to set limits on the number of vehicle movements and hours of operation and the use of electric vehicles exclusively during Framework hours (in the late hours on weekdays and on Weekends from Saturday 1pm). A monitoring team needs to be established to ensure that hours of operation and vehicle numbers are not exceeded.

10 Supporting Camden's Communities

Policy SC1 Improving Health and Well-being:

"Health Impact Assessments must be undertaken for all major applications; for non-major applications that the Council considers would have the potential to give rise to significant adverse health impacts;" **Major needs to be defined.**

10.12 "Health Impact Assessments should be undertaken for all major applications. Major applications are regarded as developments of 10 or more homes (including student housing) or a non-residential development with a floorspace of 1,000 sqm or more." **The definition of major is subject to change.**

Policy SC2 Access for All

3. "expect housing and mixed-use development schemes to incorporate dementia friendly measures;" **KTNF welcomes this development.**

7. "expect major developments, and those providing new public space, to consider the sensory needs of neurodiverse people and where appropriate make provision for quiet areas that are safe, welcoming and accessible." **KTNF welcomes this development.**

Policy SC3 Social and Community Infrastructure

Protection of existing Social and Community Infrastructure

To safeguard social and community infrastructure in Camden, the Council will: 1. "The Council will expect the developer to provide marketing and vacancy evidence for a 12 month period to assess continued demand for the existing use and all other suitable social and community infrastructure uses that could be accommodated on the site. Where it has been demonstrated to the Council's satisfaction that there is no reasonable prospect of a social or community use, then our preferred alternative will be the maximum viable amount of affordable housing." **KTNF strongly supports this measure.**

2. "Take into account listing or nomination of 'Assets of Community Value' as a material planning consideration." **KTNF strongly supports this.**

Provision of new, improved or extended social infrastructure

"Meeting the needs of the intended users and wider community 10.45 Providers of new, improved or extended social and community infrastructure are encouraged to engage early in the development process with ward members and local communities, including any Neighbourhood Forums covering the area." **KTNF strongly supports this.**

Assets of community value 10.61 "The Council supports communities wishing to nominate 'Assets of Community Value' (ACV). These are a building or piece of land which currently, or in the recent past, furthers the social well-being or cultural, recreational or sporting interests of the local community and is realistic to think it could do so in the future." **KTNF fully supports this approach.**

New and Enhanced Open Space

10.79 "In densely developed areas, when it is not possible to provide open space on site, we will consider use of a financial contribution to create usable spaces within the public realm, for example through the widening of pavements or creation of pocket parks, as this can be an effective means of achieving a range of environmental and quality of life benefits." **KTNF wholly supports this approach. It enhances the health of those living in the vicinity, and is positive in terms of biodiversity, water retention and cooling in the summer.**

Temporary provision of open space

10.83 "Sites awaiting development can sometimes make short term contributions to open space provision. We will strongly support the temporary use of cleared sites for public open space during the construction period where this can meet local needs. Such sites also provide a potential location for local food growing projects." **Community groups need stronger support over this, given previous rejections of this approach.**

11 The Natural environment

11.4 (page 424) sets out the Council's biodiversity strategy "Creating Space for Nature in Camden". Apart from its aims of ensuring the residents, visitors and workers have the opportunity to access and enjoy nature, we feel that the Camden Local Draft Plan (CLDP) should also outline how Green Infrastructure would support the well-being of increasing local population.

Policy NE1: The Nature Environment (page 425)

The contents in the Policy are very relevant. The "Protections, Encouragement, Enhancement and Contributions etc." are all very necessary but they don't seem to be backed up with some smart objectives e.g. there are no measurable specifications, no time-bound, no potential cost of resources addressed and what infrastructure would be in place to support the Policy and it doesn't feel those contents in the policy are quite achievable in reality.

A4. "Supporting communities seeking the designation of Local Green Space through the neighbourhood planning process". In 2024, KTNF suggests that public information on the preferable choices of plants, bushes and trees in gardens/terraces to achieve maximum impact in the creation of these green pathways could be integrated in some way into the plan. In due course, we would like to hear more about your views/ideas how the neighbourhood planning process would be more green value added to our local communities.

Local Green spaces (page 427)

11.10 "The Local Plan seeks to protect existing local green spaces, and the Council supports Neighbourhood Forums in identifying further local green space through neighbourhood plans." KTNF is in the review process of our current plan. We'd seek a multicultural approach to our communities in order to increase the awareness of importance to protect the local green spaces and encourage green initiatives in local redevelopment projects such as Regis Road.

Protection of other underdeveloped areas including gardens (page 427)

11.11-11.16 It has drawn our attention at the KTNF lately about those large outdoor building applications in local residential houses and flats. There were a substantial number which have taken a very large proportion of the garden green spaces and felled trees to pave the way for the outdoor extensions. To support your policy outlined in 11.12 - 11.16 we would like to see that the Council sets out guidelines/rules in the planning application forms to clarify what percentage of original gardens should be maintained as green spaces, especially properties situated in conservation areas, and how the trees in gardens should be maintained or replaced.

In addition, it is suggested a green space map may be added to the Local Plan to support 11.16 "spaces above rooflines, gaps between buildings and even small...can be vital in supporting openness, providing visual interest, softening the built environment and contributing to well-being." Indeed, we need to strike a balance between extending living space, ensuring quality of life and protecting the natural environment.

Increasing opportunities to experience nature (page 428)

11.21 Not only to "increase engagement with nature" but also, we feel that it is important to raise the level of education about nature. Schools should participate in as many biodiversity activities as possible throughout the borough of Camden - a simple set map of walking routes and nature conservation sites could be made available in schools, local libraries, community centres and local shops.

Please see the last comments from KTNF on Policy NE1 - Green corridors

The Bullet point states the aim is to "secure improvements to sections of other green corridors particularly where a development scheme is adjacent to an existing corridor..." This statement should be strengthened to ensure that links and green "stepping stones" are provided beyond the development schemes and into the existing built environment where there is a reasonable possibility of establishing more comprehensive green corridors through highly urban areas such as Kentish Town.

These areas, lacking in larger green spaces, can benefit from even smaller parcels of greenery - providing visual and possibly scented green pockets for residents and workers and essential pathways for wildlife.

KTNF suggests that preferential information on plants, bushes and trees in gardens/terraces to achieve maximum impact in the creation of these green pathways could be integrated in some way into the plan, possibly as an appendix.

Enhancing our natural environment (page 429)

With regards to the delivery of local green infrastructure projects, especially 11.27, it is suggested that there should be a summary of planting strategy for trees/green plants and this should be outlined in the Council's Camden Planning Guidance and it should provide some educational ideas such as what type of trees are suitable or unsuitable for residential gardens and small households. The planning application form should be designed in a way to reflect the Council's Planning Guidance. We would like to encourage the Council to allocate/employ more human resources to maintain our streets.

Biodiversity

11.31 & 11.32 What would be the "net gain projects"? and in what way would the Neighbourhood Plans map be improved in terms of biodiverse planting and landscaping? Further discussions are required.

Policy NE2: Biodiversity (page 431)

It is suggested that a point should be added/mentioned in the section i.e. Linking up with local resident's groups such as local conservation groups.

Protecting biodiversity (page 432)

11.37 It is a positive indication that the Council plans to prepare a baseline ecological assessment.

Enhancing biodiversity (Page 433)

11:43 There are concerns about those major development sites at Kentish Town i.e. who would follow up the proposed work/strategies of enhancement? How would the Council's emerging Green Infrastructure Strategy be delivered and maintained by the commercial developers once the building projects are completed?

To deliver "a greener and healthier environment" is a shared responsibility of the Council, the commercial developers and residents - and the specified tasks of biodiversity should be identified, clarified and agreed at the planning stage of those major projects so that they would be measured and achieved against the objective.

Integrating biodiversity into buildings (page 434)

11:47 It is suggested that a checklist should be in place thus the Council officials or independent professionals should be able to form an opinion about whether the biodiversity is "through the innovative integration of habitats, plants and wildlife into buildings through good architectural design".

Management and monitoring (page 434)

11:50 The contents of this section have reflected our concerns mentioned in 11:43 and it is very good that the phrase "Management and monitoring" is used here. As a local residents' group, we would like to assist the Council to establish a periodic reporting program with measures/benchmarking so that we know how well or not the plans have progressed.

Tree Planting and Protection

We thought the policies were very impressive and it was good to see the thought that the council had put into the whole issue of trees, including maintenance care and protection. Overall, we think the council has done very well in planting trees around the borough with more and more trees.

However, we wonder whether the Council has had enough resources. Based on the experience of residents, they have found that it's not easy to report a problem with a tree - there is a website called "fix my street" but there is often no response received.

There are probably many local residents appreciative of the trees in their streets and would be willing to assist their care. We would be interested in perhaps a scheme whereby people can sponsor a tree and offer to help the Council look after it. It is also suggested that it would be good if the council could be proactive and involve local residents, for example asking if local residents would like a tree.

Some of the pruning, particularly of the larger trees, is brutal and makes the trees look very ugly and obviates any benefits that they give in terms of carbon absorption and attracting wildlife. Could the contractors who cut back the trees do this in a much more sensitive way? Removing some branches and reducing others but does not cut them off ruining the beauty and usefulness of the tree.

9. Replacement of trees - who would check on the applicant if the replacement has been made?

Tree protection & The Tree Preservation orders and Replacement trees (page 437-page 438)

Guidance is fine but monitoring measures are required. It is viewed that some advice on different types of trees may be provided in local libraries, community centres and websites so that the residents can easily learn more about trees e.g. how and when to consider the replacements.

Tree maintenance (page 440)

11.71 It is good to know that the Council is expecting the detailed landscaping scheme or planting plan to include a management plan, to be secured by a planning condition or a Section 106 agreement. KTNF will shortly review and update its current Neighbourhood Plan, and we would like to incorporate the Council's scheme into our new initiatives to identify projects that would further improve our green living standards. Street plants in public places have become popular in the past few years - however the Council has to employ more resources to look after them on a regular basis so that the plants/flowers would be value added to the local green environment.

Water Quality

Rainwater has not been mentioned in the section. (Rainwater can become groundwater)

Saving rainwater is a worthwhile practice that can benefit both individuals and the environment. Main environmental benefits are: Reduces reliance on mains water, reduces stormwater runoff, conserves energy and reduces greenhouse gas emissions. Rainwater is part of the Natural Environment, and it should be discussed in the section.

Chapter 12: Design and Heritage

Policy D1 Achieving Design Excellence

3. "incorporate outdoor seating, sheltered rest places, quiet spaces, street furniture, boundary treatments, lighting, and signage, where appropriate."

The issue of excessive street furniture has become critical in certain areas (Kentish Town High Street for example) where pavements are narrow. Free pedestrian movement can be very difficult because of the proliferation of posts, bus stops, signage, bins etc. A clearer design strategy is required in these areas and a proactive process for the removal of excessive/non-essential items should be adopted. Bus stops in particular cause problems at pinch points causing pedestrian log jams and unsafe practices like walking out into the road. Pavement widening or relocation of stops may be necessary.

Advertisements and signage: Street furniture and the public realm

12.151 "Street furniture includes objects placed on the street including traffic signs and signals, benches, street names, CCTV cameras, lighting, cycle parking, guardrails, bollards, and bus shelters. The Council aims to reduce visual street clutter, reducing the number of objects on the street, rationalising their location and limiting the palette of materials. Free standing signs and signs on street furniture will not be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway." **KTNF supports this approach.**

Policy D2 Tall Buildings

KTNF raises potential community detriments from the separation of residential from the streetscape. Mid-height - multi-level buildings that create a layered streetscape with a mixture of private and public green spaces, might provide more variation, visual interest, and points of interaction with different sectors of the development. **KTNF favours medium density development and likes to see efforts towards this end in design layouts and plans.**

Policy D4 Extensions and Alterations to Existing Buildings

12.73 "Where extensions and alterations to existing buildings are proposed, the Council will expect biodiversity enhancements to be delivered commensurate with the scale of the development proposed to mitigate any potential loss in biodiversity, in line with Policy NE2 (Biodiversity). A number of potential measures could be incorporated into schemes, including green roofs, swift bricks, bird and bat boxes and sustainable drainage measures." **KTNF notes an increasing amount of householder applications for extensions – and this cumulatively reduces green space. In some cases, the land may not be available to offset biodiversity loss, and a mechanism should be sought, so that householders can input into an offset scheme.**

Extensions also add to run-off, reduce the capacity of the earth to absorb water and flooding considerations should be included in this section.

Policy D8 Shopfronts

KTNF requests that no oversized shop signage should be allowed on the High Street and in particular in back and side streets and industrial estates.

13 Protecting Amenity

5. “The cumulative impacts of the construction phase, including potential impact on, and damage to, highway assets, and the need for Construction Management Plans. Construction Management Plans are expected for all major applications and on smaller schemes where appropriate;” **KTNF points out that cumulative impact of more than one project is significant and needs to be addressed.**

13.7 “All major applications (10 residential units or more or for sites of 1,000 sqm or more)”. **The government has redefined major and minor sites in terms of 1-9 and 10-49 units and those over 49 – so this needs clarifying.**

13.16 “The Council will expect all major planning applications to produce a Construction Management Plan (CMP)”. **Major needs to be defined.**

13.41 “The Council will require a Crime Impact Assessment to be submitted with all applications for major developments.” **Major needs to be defined.**

Air Quality

The Council will: 1. “require all development to be at least air quality neutral, and submit an Air Quality Neutral Assessment, in accordance with the London Plan and associated guidance. An air quality positive approach is encouraged;” **KTNF wholly supports this approach.**

2. “require the following types of development to submit an Air Quality Assessment, supported by detailed air quality modelling where requested by the Council: a. all major developments;” **Major needs defining.**

c. “development that involves substantial demolition, construction and/or earthworks; d. any development that could have a significant impact on air quality, either directly or indirectly;” **the words substantial and significant need defining.**

3. “require all development to use design solutions, including maximising the use of green infrastructure and nature-based solutions.” **KTNF wholly supports this approach.**

Demolition and construction

13.78 “Baseline monitoring would normally be required for at least 3 months, prior to commencement. The results of this will then be used to inform the interpretation of construction phase monitoring, and any actions required to avoid the measured level of dust (PM10) going above a pre-agreed trigger level will be agreed by the Council.” **PM2.5 is considered a more dangerous pollutant and is generally subject to routine monitoring – and should be monitored.**

13.79 “Emergency back-up power for development sites in the operational phase should be considered early in the design process and non-combustion solutions are expected. Diesel or other liquid fuel (including biofuel) back-up power systems should be considered only as a last resort due to their disproportionately significant impact on local air quality, which, aggregated across the numerous buildings with fossil fuel backup generators in the borough, poses a risk to public health.” **The use of vegetable oils as back-up fuel is increasingly being used and should be encouraged.**

14 Safe, Healthy and Sustainable Transport

KTNF welcomes the Council’s aim to make transport in Camden more sustainable and to support walking, cycling, car sharing and all green means of traffic.

KTNF has the following hesitations and reservations regarding the fact that the Plan is very general, and that it does not propose to assess implications to wider areas. Instead, strategies should be put into policy that will consider how changes to local traffic will impact the neighbouring parts of the borough and also in particular along borough borders shared with other boroughs.

With a growing population in the Borough of Camden and the densification of its urban population, there will inevitably be more traffic, be it vehicles or people - more human voices, more noise. Camden needs to strengthen its monitoring efforts to fight noise pollution, to protect the mental health of its population. We suggest clear targets and tighter monitoring.

Large sites need traffic assessments not just during the construction period, but also assessments in terms of the future impact on public transport, once these new estates will be tenanted. There needs to be compound assessments if several large estates are planned for the near future, such as the four estates in Kentish Town (Regis Road, Murphy site, West Kentish Town Estate and Raglan Estate.)

In new, carless neighbourhoods, such as the Regis Road site and the Murphy site, as well as the Raglan Estate and the West Kentish Town Estate, KTNF would welcome Camden's commitment to phase timed restrictions during which only electric vehicles are allowed to travel. This would for example protect the residents against nuisance from noise and pollution from 10am to 6am and on Saturdays after 10am, and on Sundays.

Refurbishment and construction work (for example pavements) are often executed by a whole series of subcontractors. Too often these works are done badly (e.g. the new pavement erected in front of St Patricks Elementary School. KTNF suggests more quality control of building, of maintenance works, and to achieve this, more monitoring of the works completed. In addition, these subcontractors whose workmen at times do not speak English will carry out very noisy construction works, such as digging during late evening hours and on weekends. This needs to be much more closely monitored.

15 Delivery and Monitoring

KTNF supports the approach outlined in this chapter.

Responder 616

Date: Fri, 27 Jun 2025 15:34:23 +0000

From: Jessica Carlisle

To: PlanningPolicy

Subject: Camden Local Plan: Objection to Site Allocation C27 – Land East of
Constable House, Adelaide Road (Gypsy & Traveller site)

Sent from my iPhone

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Miss"/>	<input type="text"/>
First Name	<input type="text" value="Jessica"/>	<input type="text"/>
Last Name	<input type="text" value="Carlisle"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation: Adelaide Road Tenants Association

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered *No* to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="x"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="x"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text"/>
(4) Consistent with national policy	<input type="text" value="x"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

OBJECTION: Deletion of Site Allocation C27 from Draft Local Plan Modification proposed:

Delete Site Allocation C27 – Land East of Constable House, NW3 3QA – from the Local Plan Site Allocations (Policy H11 and related maps and tables).

□

REASONS FOR OBJECTION

Contradictions Within the Council's Own Site Assessment

The GTSIS Final Report (Nov 2024) explicitly acknowledges that the land east of Constable House — referred to as AECOM ID 1016 — is affected by flood risk, privacy issues due to proximity to adjacent residential blocks, and environmental constraints, including mature vegetation. Despite these clear concerns, the site was carried forward based solely on high-level desktop review, with no site visit or resident consultation. These constraints are serious and cannot be resolved through minor mitigation.

“Constraints include potential for flooding (Adelaide Road was identified in Flood Streets 2021 data) and potential lack of privacy [...] The latter is partially mitigated by vegetation on the site boundary.”

— GTSIS, Appendix B, p.33

In reality, vegetation is not an adequate solution to severe overlooking from multiple 4–6 storey residential buildings, including Constable House, Bridge House, and the Etons.

Loss of Protected and Valued Open Space

The site is functional green space and informal amenity land, used daily by families in Constable House and surrounding estates. It supports biodiversity and wellbeing and has been enhanced through community initiatives like the Communi-Trees project, where fruit trees and wildflowers were planted with local young people. Development would directly contradict the aims of Camden's Local Plan policies on open space, community greening, and access to nature.

Flood Risk Ignored in Practical Terms

The study flags the Adelaide Road site as a known flood area, appearing in Camden's "Flood Streets 2021" data, but does not exclude the site on this basis. This puts future residents — including potentially vulnerable families — at risk and undermines Camden's climate resilience ambitions. The Planning Policy for Traveller Sites (2023) states that high-risk flood zones are inappropriate for Traveller site development.

Access Constraints and Worsening Pollution

The site has no independent access and would require vehicles, services, and construction traffic to enter via residential areas. The GTSIS itself acknowledges “lack of privacy” and possible access challenges, but underplays the full impact on an already congested and polluted road network.

Camden residents along Adelaide Road are already suffering ongoing noise, dust, traffic, and access disruption due to the HS2 project. Adding further construction and eventual occupation traffic to this site is unacceptable and would increase health and wellbeing risks for the entire area — particularly families and older residents.

Lack of Transparency and Local Engagement

The GTSIS confirms that no community consultation or site visit was included in the selection process:

“No community engagement nor site visits were included in the scope of the study.”

— GTSIS, p.6

Many residents of Constable House, the Etons, and nearby buildings are still unaware of these proposals. This fails to meet the Council’s commitment to meaningful resident engagement and undermines confidence in the planning process.

Internal Policy Conflict

Allocating this site would contradict Camden’s own strategic objectives, including:

- Supporting access to green space and play areas
- Enhancing community-led greening initiatives
- Reducing exposure to air and noise pollution
- Mitigating flood risk
- Ensuring development does not reduce residential amenity

□

CONCLUSION

This space is not appropriate or safe for use as a Traveller site — or any new housing development — due to fundamental constraints identified in Camden’s own technical evidence base. It would cause the loss of vital community space, increase environmental risk, and exacerbate disruption already being endured due to HS2.

I strongly urge that Site C27 be deleted from the Local Plan.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.
You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

The proposed allocation is unsound and the plan should be modified by removing it from the plan on the basis of:

- Loss of valued amenity space;
- Overlooking and privacy conflicts;
- Unacceptable flood risk.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	27.06.24
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Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Date: Fri, 27 Jun 2025 16:36:00 +0100
From: Michael Bannon
To: [redacted]
Subject: Objection to Site C27 – Land East of Constable House, Adelaide Road
(Gypsy & Traveller Site)

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Camden Planning Department,

As a local resident of [REDACTED], I am submitting this formal objection to the designation of Site C27 (land east of Constable House, Adelaide Road) for Gypsy and Traveller accommodation within the Camden Local Plan. I am requesting the complete removal of this site allocation from all relevant planning documents, including Chapter 4 Central Camden Table 5, Chapter 7 Policy H11, and the Draft Policies Map and Schedule of Proposed Local Plan Site Allocations.

My concerns center on several critical issues that appear to have been inadequately assessed:

Community Assets and Green Infrastructure The proposed site currently functions as vital green space serving multiple community needs. This area contains established mature vegetation, including approximately 30-60 holly trees, alongside recent environmental improvements completed through the Communi-Trees initiative. This collaborative project, involving local youth, the KOKO Foundation, Think & Do, and Camden Council, has enhanced the space with fruit trees and wildflower meadows. The destruction of both existing mature specimens and newly established plantings would represent a significant loss of urban biodiversity and community investment.

Residential Amenity and Privacy The site's location creates unavoidable conflicts with existing residential use. Complete encirclement by housing developments-Constable House, Provost Road properties, the Etons, and the new Haverstock Hill development-means any development would severely compromise residents' privacy and enjoyment of their homes. The proximity to high-traffic Adelaide Road and regular bus services adds additional environmental stressors. Furthermore, ongoing antisocial behavior, including drug-related activity in the immediate vicinity, creates existing challenges that require resolution before considering additional development pressure.

Safety and Environmental Hazards The site's location within a designated flood risk zone directly contravenes Government guidance outlined in paragraph 13 of the Traveller Sites Planning Policy, which explicitly discourages development in flood-prone areas.

Recent flooding events in the area demonstrate the ongoing reality of this risk, making the site fundamentally unsuitable for residential accommodation.

Historical Use and Community Need Historical mapping evidence confirms this land's longstanding designation as playground space specifically serving Constable House residents. No alternative recreational facilities exist within reasonable proximity, and the daily use by local children-audible each evening-demonstrates continuing community reliance on this space. In an area where outdoor amenity space is already severely limited, the loss of this resource would disproportionately impact families and children.

The apparent disconnect between this proposal and Camden's stated commitments to enhancing green infrastructure, promoting biodiversity, improving recreational facilities, and implementing sustainable drainage solutions raises questions about policy coherence and implementation.

Process Concerns The absence of meaningful community consultation represents a significant procedural failing. Residents of directly affected properties, including Constable House and the Etons, report being unaware of these proposals, suggesting inadequate engagement with those most impacted by the decision.

The constraints identified within Camden's own Gypsy and Traveller Site Identification Study appear to have been insufficiently weighted in the assessment of Site C27, particularly regarding residential proximity, green space value, recreational use, flooding risk, and access limitations.

Requested Action I respectfully but firmly request the immediate removal of Site C27 from all Camden Local Plan documentation and site allocation schedules. I also wish to register my intention to participate in the examination hearings for the Draft Local Plan.

I trust you will give these substantive concerns the serious consideration they merit and look forward to confirmation of Site C27's removal from the proposed allocations.

Yours faithfully,

Michael Bannon
[redacted address]
[redacted] [redacted postcode]