

Schedule of Proposed Minor Modifications to the Camden Local Plan Proposed Submission Draft

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
NMM01	Policy S2 Euston Area	3.19 / 3.20	Propose to insert the following new paragraph after paragraph 3.19 - <u>Much of the development capacity at Euston is on land created by the redevelopment of the stations and tracks and as designs for the stations are still emerging, the exact amount of development will be determined by the amount of land that is enabled, the ability to overcome constraints associated with railway infrastructure, particularly the cost and viability of the complex enabling works. Should new areas for development be identified through design refinement of the stations and/ or work to meet the ambition to deliver new homes in the wider Euston area, it may be possible to deliver in excess of the development identified in Policy S2. Further engagement with local communities will however be required.</u> Subsequent paragraphs will need to be re-numbered.	To provide further information – in response to Lendlease and the Euston Landowners comments (Responder ID 619)
NMM02	Policy H1 Maximising Housing Supply	Para 7.7	Propose the following modification to paragraph 7.7 - The Local Plan aims to deliver 11,550 additional homes (770 homes per year) in Camden over the Plan period 2026/27 to 2040/41.	To respond to the comments from the GLA (Responder ID 13)
NMM03	Policy H4 Maximising the supply of affordable housing	Para 7.124	Propose the following modification to paragraph 7.124 - <u>We will expect applications to adhere as closely as possible to the guideline mix set out in Policy H4 part B6. However, the</u> The guideline mix will be applied flexibly taking into account <u>the need to achieve a rational division of the development in terms of homes of appropriate sizes and tenures, and</u> the criteria in Policy H4 , and in <u>In</u> certain circumstances the Council may support proposals which only provide low-cost rented housing or only provide intermediate housing.	To respond to the comments from the GLA (Responder ID 13)

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
NMM04	Policy H4 Maximising the supply of affordable housing	Para 7.154	<p>Propose the following modification to paragraph 7.154 - For smaller development proposals that do not provide affordable housing in accordance with the sliding scale (set out in paragraph 7.116), and larger development proposals that do not meet the London Plan viability thresholds (set out in paragraph 7.120 of this Plan and Policy H5 of the London Plan 2021). In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability <u>in negotiating the affordable housing contribution,</u> including <u>We will take account of</u> the availability of public subsidy, particular costs associated with the development (such as restoration of heritage assets and remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build to rent housing). <u>Subject to Where development proposals do not satisfy the relevant sliding scale target or the</u> London Plan viability threshold approach, we will expect submission of a financial viability appraisal to justify the proportion of affordable housing proposed and demonstrate that the proposed affordable housing is deliverable, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. The Council will also seek funding from the developer for an independent verification of the appraisal.</p>	To respond to the comments from the GLA (Responder ID 13)
NMM05	Policy H11 Accommodation for travellers		Propose to update all references to Gypsies and Travellers in the Plan to use capital letters	To correct typographical errors - in response to comments from London Gypsies

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
				and Travellers (Responder ID 294)
NMM06	Policy H11 Accommodation for travellers	Para 7.356	Propose the following modification to Para 7.356 - 'Gypsies and Travellers' are other persons of nomadic habitat of life whatever their race or origin....	To align with the definition in national policy - in response to comments from London Gypsies and Travellers (Responder ID 294)
NMM07	Policy CC2 Prioritising the retention of existing buildings	8.13	Propose the following modification to Para 8.13 – Developers considering substantial demolition, where 50% or more of the building's floorspace (<u>Gross External Area</u>) would be removed, will be expected to undertake a condition and feasibility assessment. This assessment should be carried out at the earliest opportunity to understand the reuse potential of the existing building before progressing a proposal for submission to the Council.	For clarity – to respond to comments from Hilson Moran (Responder ID 507)
NMM08	Policy CC2 Prioritising the retention of existing buildings	8.14	Propose the following modification to Para 8.14 – The condition and feasibility assessment should include: <ul style="list-style-type: none"> • a review of how the building is (or has been) used and functions; • servicing information; and • a technical building survey. <u>Further information is provided in Camden Planning Guidance Energy Efficiency and Adaptation and developers will be expected to have due regard to this.</u>	For clarity - to respond to comments from Hilson Moran (Responder ID 507)

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
NMM09	Policy CC2 Prioritising the retention of existing buildings	8.24	Propose the following modification to bullet point 4 in paragraph 8.24 – “When assessing whether the proposal constitutes the best use of the site the Council will consider:..... • public benefit, including but not limited to, the delivery of social and community infrastructure, open space, active travel measures, <u>public transport infrastructure</u> , affordable workspace, a significant uplift in jobs and estate regeneration;	For clarity – to respond to comments made by Places for London (Responder ID 595)
NMM10	Policy CC2 Prioritising the retention of existing buildings	8.26	Propose the following modification to paragraph 8.26 – "Development proposals that involve less than substantial demolition <u>or</u> substantial demolition must include a pre-demolition audit to identify all materials within the building and document how they will be managed in line with the waste hierarchy.	To respond to comments from Shaftesbury Capital (Responder ID 583)
NMM11	Policy CC3 Circular economy and reduction of waste	8.36	Propose the following modification to the last sentence of Paragraph 8.36 - Where a Construction Management Plan is required (<u>see Policy A1 Protecting Amenity</u>), this matter can be addressed in the Environment subsection of the report.	For clarity - to respond to comments from Hilson Moran (Responder ID 507)
NMM12	Policy CC3 Circular economy and reduction of waste	8.37	Propose the following modification to Paragraph 8.37 - " For new-build major applications (<u>providing 10 or more new homes or 1,000 square meters or more of new or replaced floorspace</u>), or major applications which involve substantial demolition and rebuild , this information should be provided as part of the Circular Economy Statement (see Part C of Policy CC3).	For clarity – to respond to comments from Unite (Responder ID 618)

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
NMM13	Policy CC5 Sustainability improvements to existing buildings	8.66	Propose the following modification to paragraph 8.66 - "The Council will support the installation of secondary, <u>slim-profile or vacuum double glazing</u> , double or triple glazed windows, where appropriate.	For clarity – to respond to comments from the Highgate Society (Responder ID 649)
NMM14	Policy CC7 Heat Networks	8.100	Propose the following modification to paragraph 8.100 – "London Plan Policy SI3 Energy Infrastructure requires major development proposals within Heat Network Priority Areas (also known as Heat Network Zones) to have a communal low-temperature heating system in accordance with the following heating hierarchy	For clarity
NMM15	Policy CC8 Overheating and cooling	8.105	Propose the following modification to paragraph 8.105 - "The UK's climate is changing and in the coming decades periods of high temperature will become more common and more intense. <u>The London Climate Resilience Review (2024), commissioned by the Mayor of London, provides an assessment of London's climate resilience and identifies heat risk as one of the principal climate risks for London.</u> Recent heatwaves have demonstrated how high temperatures are a threat to health and well-being, our infrastructure and economic productivity. Situated in the heart of London, Camden is surrounded by an urbanised landscape characterised by concrete structures, asphalt roads, and limited green spaces. These urban features absorb and retain heat, making cities noticeably warmer than rural areas.	For clarity – to respond to comments from the Environment Agency (Responder ID 657)
NMM16	Policy CC8 Overheating and cooling	8.113	Propose the following modification to paragraph 8.113 - "Other measures that could be used to reduce the overheating risk in buildings and the spaces around buildings include: <ul style="list-style-type: none"> controlling solar gain (through window design – considering size, properties of the glass used, depth of window reveal, and window openings); 	To provide further information - to respond to comments from the Highgate

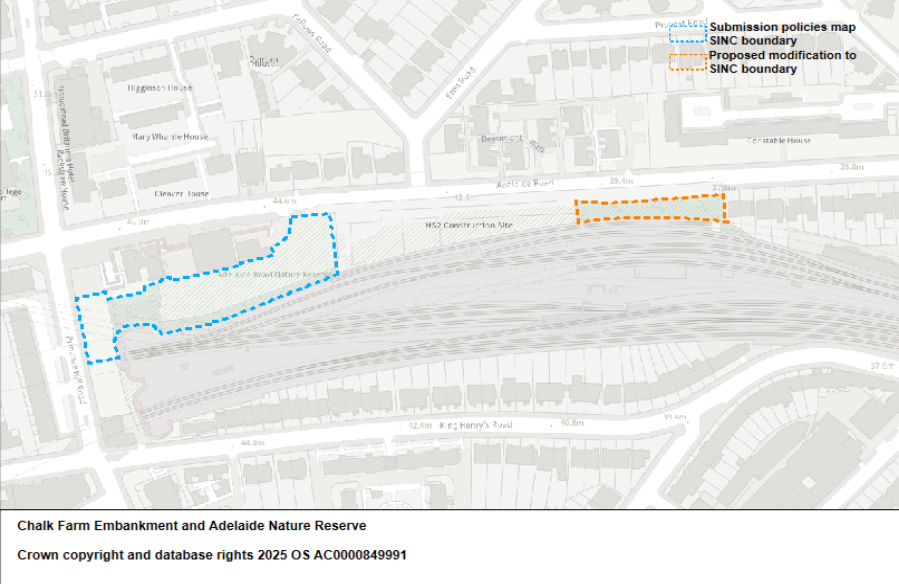
Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
			<ul style="list-style-type: none"> <u>using materials with a high thermal mass, to absorb and retain heat produced by the sun. These materials can be used to regulate indoor temperatures, especially to keep inside spaces cool during the day;</u> 	Society (Responder ID 649)
NMM17	Policy CC8 Overheating and cooling	8.113	Propose the following modification to the last bullet point of paragraph 8.113 - <ul style="list-style-type: none"> maximising green landscaping <u>and blue infrastructure, such as green and blue roofs and rain gardens</u> (see policies in the Natural Environment Chapter)" 	To provide further information - to respond to comments from Redington Frogna! Neighbourhood Forum (Responder ID 251)
NMM18	Policy CC11 Sustainable drainage	8.157	Propose the following modification to paragraph 8.157 - "When taking forward schemes involving SuDS, developers will be expected to have due regard to <u>the National Standards for Sustainable Drainage Systems (SuDS)</u> , Camden Planning Guidance on Water and Flooding and Sustainable Drainage Systems: Non-Statutory Technical Standards. Further information on SuDS is also available on <u>the Susdrain website</u> ."	For clarity – to respond to comments from Thames Water (Responder ID 409)
NMM19	Policy CC11 Sustainable drainage	8.162	Propose the following modification to paragraph 8.162 - "Applications for basement development and other development vulnerable to flooding in areas identified at risk of flooding in the Counters Creek catchment area, should therefore seek to reduce surface water run-off rates to be as close to go beyond the greenfield run-off rate <u>as where</u> feasible."	For clarity – to respond to comments from Thames Water (Responder ID 409)

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
NMM20	Policy CC11 Sustainable drainage	8.151	Propose to insert the following text at the end of paragraph 8.151 - <u>"Trees have an important role to play in this, as they are known to reduce surface water run-off and can have multifunctional benefits, including promoting health and wellbeing, providing habitat for wildlife, improving air quality and water quality (See Policy NE3 Tree planting and protection)."</u>	For clarity – to respond to comments from Redington Frogna! Neighbourhood Forum (Responder ID 251)
NMM21	Policy IE2 Offices	9.37	Propose to insert the following text at the end of paragraph 9.37 – <u>"We will apply the approach to marketing flexibly where there is a proposal for an alternative employment use that would provide benefits for Small and Medium-sized Enterprises, in terms of access to affordable/low cost workspace and subject to other relevant Local Plan policies."</u>	To provide further information on our proposed approach – to respond to comments from the Arch Co (Responder ID 536)

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
NMM22	Policy IE2 Offices	9.40	Propose to insert the following text as a new paragraph, after paragraph 9.40 - <u>“There are a number of large cultural, educational and health institutions in the borough, particularly within the Central Activities Zone where office and administrative space form part of their estate. Some of these bodies have estate plans identifying the potential need to change the use of different buildings over time to meet changing priorities and demands. Where the proposed development is publicly funded or otherwise serves an acknowledged public purpose, we will consider reducing the period of the marketing exercise or waiving this requirement, provided the space will continue to be used by the institution to deliver its offer. This does not remove the Council’s requirement for such schemes to make a financial contribution towards the loss of employment space.”</u> Subsequent change to paragraph numbers.	To provide further information on our approach – in response to comments from the British Museum (Responder ID 594)
NMM23	Policy IE6 Supporting designated centres and essential services	9.108	Propose the following modification to paragraph 9.108 - “The Council will seek the retention of smaller premises in centres where these form an established part of the centre’s character and the premises has a potential economic role, and where a specific local need is identified in a neighbourhood plan. We will take into account the availability of smaller premises elsewhere in the centre and other centres nearby <u>and where additional floorspace is required to meet regulations on matters such as fire safety and access.</u> For large major schemes...”	For clarity - to respond to comments from Shaftesbury Capital (Responder ID 583)
NMM24	Policy SC3 Social and community infrastructure	10.40	Propose the following modification to paragraph 10.40 - “The term “social and community infrastructure” in this section refers to a wide range of infrastructure that provides a service to the community. This includes: childcare; education.... indoor and outdoor sports and recreation facilities;	For clarity – to respond to comments from Sport England (Responder ID 512)
NMM25	Policy SC4 Open space	10.81	Propose the following modification to paragraph 10.81 to include the following sentence at the end of the paragraph: <u>“Further guidance on play provision is set out in the Camden Planning Guidance on open space.”</u>	For clarity – to respond to comments from Kings Cross

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
				Central Ltd Partnership (Responder ID 524)
NMM26	Policy NE1 The natural environment	11.14	Propose the following modification to paragraph 11.14 - "Part of the established character of garden spaces may also be defined through features such as <u>hedges</u> , railings and garden walls."	For clarity - to respond to comments from Redington Frogna Neighbourhood Forum (Responder ID 251)
NMM27	Policy NE1 The natural environment	11.38	Propose to insert the following text at end of paragraph 11.38 - ' <u>Policy A1 – Protecting Amenity provides further detail on how the Council will manage impacts arising from new development.</u> '	For clarity – to respond to comments from Highgate Neighbourhood Forum (Responder ID 598)
NMM28	Policy NE2 Biodiversity	11.48	Propose the following modification to paragraph 11.48 - "Typically, a building needs to be at least 5 metres in height with clearance of around 5 metres between the host building and other buildings/obstructions <u>beneath and in front of the swift brick</u> "	For clarity – to respond to comments from the Camden Swifts Group (Responder ID 392)
NMM29	Policy NE2 Biodiversity	11.40	Propose the following modification to paragraph 11.40 - "As a benchmark, <u>at least</u> 50% of total planting should be native species and <u>at least</u> 50% species...."	For clarity – to respond to comments from the Highgate

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
				Society (Responder ID 649)
NMM30	Policy T2 Prioritising walking, wheeling and cycling	14.19	Propose to insert the following text at the end of paragraph 14.19 - <u>Where reference is made to wheeling, this is considered to be an equivalent alternative to foot/pedestrian-based mobility. It includes wheeled mobilities such as manual self- or assistant-propelled wheelchairs, including wheelchairs with power attachments or all-terrain attachments (such as the "Freewheel"), powered wheelchairs, mobility scooters (three and four-wheeled) and rollators.</u>	For clarity - to respond to comments from the Highgate Society (Responder ID 649)
NMM31	Policies map		Propose to update the legend in the Policies Map to change "Specialist Centres" to 'Specialist Areas'; and to change "Central London Area" to 'Central Activities Zone'	For consistency - to respond to comments from Shaftesbury Capital (Responder ID 583)

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
NMM32	Policies map		<p>Propose to amend the boundary of the Chalk Farm Embankment and Adelaide Road SINIC to add the section outlined in orange</p>  <p>Chalk Farm Embankment and Adelaide Nature Reserve Crown copyright and database rights 2025 OS AC0000849991</p>	To correct an error
NMM33	Policy T1 Safe, healthy and sustainable transport	14.10	<p>Propose the following modification to paragraph 14.10 - “When determining applications for new development, the Council will consider the impacts of movements to, from and within a site, including links to existing transport networks, through transport assessments, travel plans, delivery and servicing management plans, and construction management plans, to manage and mitigate the impact of developments on Camden’s infrastructure, environment and communities <u>in Camden and neighbouring areas</u>, and ensure that benefits are secured which meet the needs of Camden’s communities.”</p>	For clarity - in response to Q2 in Matter 8 of the Inspector’s Matters, Issues and Questions

Reference Number	Policy	Paragraph	Proposed Modification	Reason for Modification
NMM34	Policy IE5 Hotels and Visitor Accommodation	9.75	Propose the following modification to Paragraph 9.75 - While the Council welcomes continuing investment in hotels and visitor accommodation, it is vital that this does not undermine the need to provide a sufficient supply of housing. We will therefore resist proposals for hotels or visitor accommodation on sites currently used for housing, where there is an unimplemented planning permission for housing or where this would prejudice the delivery of new homes on sites allocated for development in the Local Plan <u>in line with Policy H1 Maximising housing supply</u> . New hotels and visitor accommodation will therefore only be supported in the locations set out in Part B of Policy IE5 above.	For clarity
NMM35	Policy IE5 Hotels and Visitor Accommodation	9.76	Propose the following modification to Paragraph 9.76 - The Council is concerned about the rise in short-term lets resulting in the loss of permanent homes, including where entire buildings are being used as blocks of short-term let accommodation. <u>Proposals for short-term lets will therefore be determined in accordance with Part B.4 of Policy H1 Maximising housing supply. Furthermore</u> The Council will continue to take enforcement action where properties are found to be in breach of planning regulations and seek further controls from government to enable the proliferation of this accommodation to be more effectively managed.	For clarity