

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

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM01	Policy S1 South Camden		Propose the following modification to Policy S1, Part U 1 - 'The delivery of a new High Speed 2 station and mainline station improvements at Euston, <u>alongside improvements to other supporting public transport and active travel infrastructure serving the station.</u> '	For clarity – in response to TfL comments (Responder ID 604)
MM02	Policy S1 South Camden		Propose the following modification to Policy S1, Part U 2 - “The transformation of Euston Road <u>in accordance with Euston Healthy Streets</u> and the removal of the King's Cross gyratory.”	For clarity – in response to TfL comments (Responder ID 604)
MM03	Policy S1 South Camden		Propose the following modification to Policy S1 Part Q - "the Council will continue to protect the concrete plants <u>at</u> King's Cross, which <u>are is...</u> "	For clarity – in response to Tarmac Trading comments (Responder ID 499)
MM04	Policy S2 Euston Area		Propose to insert a new criterion in Policy S2 Part A, after criterion 1 - “To realise the vision and objectives set out in the Euston Area Plan, the Council will:.... <u>2. Support the optimisation of development at Euston, recognising the opportunity to secure long-term benefits and deliver nationally significant transport infrastructure;</u> Subsequent criterion will need to be re-numbered	For clarity - in response to Lendlease and the Euston Landowners comments (Responder ID 619)
MM05	Policy S2 Euston Area		Propose the following modification to Policy S2 Part A. 3. expect development to deliver new and replacement employment floorspace across the Euston Area, and support and prioritise the creation and retention of suitable <u>employment</u> floorspace for <u>employment, education,</u> research, learning and knowledge-based uses;...”	For clarity – to respond to the comments made by UCL (Responder ID 523)

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM06	Policy S4 Bloomsbury Campus Area		Propose the following modification to Policy S4, Part A.4 - consolidate, improve and increase academic space	For clarity – to respond to the comments made by UCL (Responder ID 523)
MM07	Policy W1 West Camden		Propose the following modification to Policy W1, Part D - The O2 Centre site referred to in Part C above has the potential to become a vibrant and diverse new neighbourhood..."	For clarity – to respond to the comments made by Landsec (Responder ID 498)
MM08	Policy W1 West Camden		Propose the following modification to Policy W1 Part J - "The majority of new retail development in the West of the borough is expected to be delivered through the development of the O2 Centre site (site allocation W2) ."	For clarity – to respond to the comments made by Landsec (Responder ID 498)
MM09	Policy W1 West Camden		Propose the following modification to Policy W1 Part L.6 - "The delivery of a new health centre and community facilities as part of the redevelopment of the O2 Centre site (site allocation W2) "	For clarity – to respond to the comments made by Landsec (Responder ID 498)
MM10	Policy W1 West Camden		Propose the following modification to Policy W1 Part L.7 - "The delivery of new public open space as part of the re-development of the O2 Centre site (site allocation W2) ;	For clarity – to respond to the comments made by Landsec (Responder ID 498)
MM11	Site Allocation Policy S5 120– 136 Camley Street		Propose the following modification to Site Allocation S5 Criterion 11 b - 11. contribute towards public realm and connectivity enhancement projects along Camley Street, to strengthen it as a key route for all cyclists and pedestrians, through: a. the provision of a new public space and urban greening to improve the entrance from Agar Grove and the approach from	To remove duplicate text

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			<p>the south under the adjacent bridge. This should include a coordinated route along/across the boundary with Agar Grove Estate (site S21);</p> <p>b. the provision of a new public space and urban greening to improve the entrance from Agar Grove and the approach from the south under the adjacent bridge. This should include a coordinated route along/across the boundary with Agar Grove Estate (site S21);</p> <p>Subsequent criterion will need to be re-numbered.</p>	
MM12	Site Allocation Policy S5 120–136 Camley Street		<p>Propose the following modification to Site Allocation S5, 'Other Considerations' second bullet point -</p> <p>"Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where that work has recently been undertaken. <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development</u>".</p>	To respond to Thames Water comments (Responder ID 409)
MM13	Site Allocation Policy S6 104-114 Camley Street and Cedar Way Industrial Estate		<p>Propose the following modification to Site Allocation S6 to insert a new criterion -</p> <p><u>(19) - seek to contribute towards improved access to bus services in the local area.</u></p>	For clarity – to respond to TfL comments (Responder ID 604)
MM14	Site Allocation Policy S6 104-114 Camley Street and		<p>Propose the following modification to Site Allocation S6 'Other Considerations' – delete bullet point 2 and replace with -</p> <p><u>"Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary and upgrades</u></p>	To respond to Thames Water comments (Responder ID 409)

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	Cedar Way Industrial Estate		<u>to the wastewater network may also be required. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required "</u> .	
MM15	Site Allocation Policy S7 24-86 Royal College Street (Parcelforce and ATS Tyre Site)		Propose the following modification to Site Allocation S7, 'Other Considerations' second bullet point - "Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where that work has recently been undertaken. <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development"</u> .	To respond to Thames Water comments (Responder ID 409)
MM16	Site Allocation Policy S8 St. Pancras Hospital		Propose the following modification to Site Allocation S8 Criterion 4 - "be designed to conserve or and enhance existing heritage assets, including building, spaces and the adjacent St Pancras Gardens, recognising their contribution to the character of the conservation area, and seek to retain and restore buildings that make a positive contribution in accordance with Policy D5 (Historic Environment);"	For clarity
MM17	Site Allocation Policy S8 St. Pancras Hospital		Propose the following modification to Site Allocation S8, 'Other Considerations' second bullet point - "Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this	To respond to Thames Water comments (Responder ID 409)

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			may involve a review of existing material where that work has recently been undertaken. <u>Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development".</u>	
MM18	Site Allocation Policy S9 Shorebase Access		Propose the following modification to Site Allocation S9, 'Other Considerations' – remove the second bullet point Thames Water have suggested that the location of this site and the scale of development being proposed could trigger the need for local upgrades to the water supply and as such detailed assessment work is likely to be required. In some cases, this may involve a review of existing material where that work has recently been undertaken.	To respond to Thames Water comments (Responder ID 409)
MM19	Site Allocation Policy S11 Former Royal National Throat, Nose and Ear Hospital		Propose the following modification to Site Allocation S11 'Other Considerations' – delete bullet point 3 and replace with - <u>"Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required".</u>	To respond to Thames Water comments (Responder ID 409)
MM20	Site Allocation Policy S16 Former Central St Martins College		Propose the following modification to Site Allocation S16 'Other Considerations' – insert an additional bullet point under bullet point 1 - <u>"Given its special architectural and historic interest, a photographic and recording report relating to the back stage facilities and machinery of the Cochrane Theatre will be</u>	To reflect the existing planning permission

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			<u>required to be submitted, as secured in planning permission 2020/2470/P"</u>	
MM21	Policy S30 Birkbeck College, Malet Streer		Propose the following modification to Site Allocation S30 'Allocated Uses' – <u>permanent self-contained homes Higher education (academic and ancillary space)</u>	To correct an error in the published Plan
MM22	Site Allocation Policy C2 Regis Road and Holmes Road Depot		Propose the following modification to Site Allocation C2 Criterion 24 - " ensure that Regis Road is transformed into a green pedestrian and cycling route by moving large vehicles on to a separate service road <u>where possible</u> in advance of any significant commercial development <u>provided as part of the redevelopment</u> . This should be included as part of the Phasing Plan required for the development;	For clarity
MM23	Site Allocation Policy C2 Regis Road and Holmes Road Depot		Propose the following modification to Site Allocation C2 'Other Considerations' – delete bullet point 5 and replace with - <u>"Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water and waste networks will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required"</u>	To respond to Thames Water comments (Responder ID 409)
MM24	Site Allocation Policy C3 Murphy Site		Propose the following modification to Site Allocation C3 'Other Considerations' – delete bullet point 5 and replace with - <u>"Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that</u>	To respond to Thames Water comments (Responder ID 409)

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			<u>upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required"</u>	
MM25	Site Allocation Policy C4 Kentish Town Police Station		Propose the following modification to the bullet point under 'Context' – The Council would support the site being taken forward as part of the development of Regis Road (Policy C3 C2) if this enables a better solution to be found to meet the operational needs of the Metropolitan Police Service and support the delivery of the Regis Road masterplan	To correct the policy number reference
MM26	Site Allocation Policy C4 Kentish Town Police Station		Propose the following modification to Site Allocation C4 criterion 4 - "seek to retain the Section House building in accordance with Policy CC2 (Retention of Existing Buildings) and re-use to provide student accommodation, <u>if no longer needed for police use</u> . Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation)"	To respond to the comments made by the Met Police (Responder ID 8)
MM27	Site Allocation Policy C5 369 – 377 Kentish Town Road		Propose the following modification to Site Allocation C5 'Area' – 0.3 hectares 0.03 hectares	To correct an error in the published Plan
MM28	Site Allocation Policy C7 Morrisons Supermarket		Propose the following modification to Site Allocation C7 'Other Considerations' – delete bullet point 7 Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or	To respond to Thames Water comments (Responder ID 409)

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			whether local upgrades and/ or a detailed drainage strategy may be required.	
MM29	Site Allocation Policy C8 Former Morrisons Petrol Filling Station		Propose the following modification to Site Allocation C8 'Other Considerations' – delete bullet point 3 Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)
MM30	Site Allocation Policy C9 100 Chalk Farm Road		Propose the following modification to Site Allocation C9 'Other Considerations' – delete bullet point 5 Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)
MM31	Site Allocation Policy C10 Juniper Crescent		Propose the following modification to Site Allocation C10 'Other Considerations' – delete bullet point 3 Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM32	Site Allocation Policy C12 Gilbeys Yard		Propose the following modification to Site Allocation C12 'Other Considerations' – amend bullet point 6 - "Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required "	To respond to Thames Water comments (Responder ID 409)
MM33	Site Allocation Policy C12 Gilbeys Yard		Propose the following modification to Site Allocation C12 'Other Considerations' – insert new bullet point at the end " <u>Proposals should include a strategy for responding to the National Grid Electricity Transmission (NGET) underground Cable Route present within/adjacent to the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design</u> "	To respond to National Grid comments (Responder ID 400)
MM34	Site Allocation Policy C13 West Kentish Town Estate		Propose the following modification to Site Allocation C13 'Other Considerations' – delete bullet point 2 Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required. and replace with - " <u>Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate</u>	To respond to Thames Water comments (Responder ID 409)

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			<u>whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required"</u>	
MM35	Site Allocation Policy C15 Wending Estate and St Stephens Close		Propose the following modification to Site Allocation C15 'Other Considerations' – delete bullet point 2 Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required. and replace with - <u>"Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water network will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required"</u>	To respond to Thames Water comments (Responder ID 409)
MM36	Site Allocation Policy C16 Shirley House		Propose the following modification to Site Allocation C16 'Other Considerations' – insert new bullet point at the end <u>" Proposals should include a strategy for responding to the National Grid Electricity Transmission (NGET) underground Cable Route present within/adjacent to the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design"</u>	To respond to National Grid comments (Responder ID 400)

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MM37	Site Allocation Policy C16 Shirley House		Propose the following modification to Site Allocation C16 'Other Considerations' – insert new bullet point at the end <u>"Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand whether the existing water supply network capacity in this area is able to support the demand anticipated from the development"</u>	To respond to Thames Water comments (Responder ID 409)
MM38	Site Allocation Policy C16 Shirley House		Propose the following modification to Site Allocation C16 'Description of Existing Site - "Shirley House <u>(also known as Camden Point)</u> is a seven storey office building on the corner of Camden Road and Camden Street, adjacent to the Regents Canal. It is <u>was formerly</u> occupied by the British Transport Policy headquarters"	For clarity
MM39	Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 'Allocated Uses' - "Permanent self-contained homes and student accommodation, employment uses (including maker spaces, creative industries and offices), retail, and food and drink uses (on the ground level) <u>and station infrastructure</u> "	In response to comments from Places for London / Network Rail (Responder ID 595)
MM40	Site Allocation Policy C17 Camden Town over station development		Propose the following modification to Site Allocation C17 criterion 15 - "provide step-free access <u>and capacity improvements</u> to Camden Town underground station "	In response to comments from Places for London / Network Rail (Responder ID 595)

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM41	Site Allocation Policy C18 UCL Campus, 109 Camden Road		Propose the following modification to Site Allocation C18 'Other Considerations' – amend third bullet point - "Applicants will be expected to liaise with Thames Water early in the design process to agree whether modelling work is required to understand to investigate whether the existing water supply network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required."	To respond to Thames Water comments (Responder ID 409)
MM42	Site Allocation Policy C21 Grand Union House, 18-20 Kentish Town Road		Propose the following modification to Site Allocation C21 'Allocated Uses' - "Employment (office), retail (ground floor) and permanent self contained homes"	For clarity
MM43	Site Allocation Policy C23 Former flats 121 – 129 Bacton, Haverstock Road		Propose the following modification to Site Allocation C23 'Key Considerations' - Planning permissions (2012/6338/P dated 25/04/2013 (as amended by planning permissions 2014/3633/P, 2015/1189/P and 2016/5358/P) approved 314 homes in total (including 99 replacement homes). Phase 1 delivered 67 466 new and replacement homes. The Site has an extant planning permission to deliver the remaining 247 homes across Phase 2 (a net increase of 148 homes)... "	Factual update
MM44	Site Allocation Policy W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road		Propose the following modification to Site Allocation W2 'Other Considerations' – delete third bullet point Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
			and replace with - <u>"Thames Water have advised that due to location of this site and the scale of development proposed it is anticipated that upgrades to the water and waste networks will be necessary. Applicants will be expected to liaise with Thames Water early in the design process to agree what modelling work is required to investigate whether the existing water and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required"</u>	
MM45	Site Allocation Policy W13 551-557 Finchley Road		Propose the following modification to Site Allocation W13 'Key Considerations' – Planning permission (2020/5444/P) has been granted for a mixed use scheme of residential and flexible commercial use <u>and this scheme has been implemented.</u>	Factual update
MM46	Site Allocation Policy N2 Mansfield Bowling Club		Propose the following modification to Site Allocation N2 'Other Considerations' – delete bullet point 3 Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	Factual update as the site has been cleared
MM47	Site Allocation Policy N3 Queen Mary's House		Propose the following modification to Site Allocation N2 'Other Considerations' – delete bullet point 1 Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and/ or a detailed drainage strategy may be required.	To respond to Thames Water comments (Responder ID 409)

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM48	Policy H1 Maximising Housing Supply		Propose the following modification to Policy H1 Part A – The Council will aim to deliver at least 11,550 additional homes from 2026/27 to 2040/41. <u>This includes the final three years of the London Plan 2021 housing target for Camden (1,038 homes per year for years 2026/27, 2027/28 and 2028/29 of the Plan period).</u>	To respond to the comments from the GLA (Responder ID 13)
MM49	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part A - " The Council will aim to secure a sufficient supply of pitches / plots to meet the accommodation needs of Camden’s established Traveller community over the Plan period to 2041. <u>This includes a target of thirteen additional pitches by 2035/36.</u>	To accord with London Plan Policy H14
MM50	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11.Part C - "To help meet the accommodation needs of Camden’s established Traveller community the following sites have been allocated in the Local Plan to deliver <u>six</u> permanent Traveller pitches:..."	For clarity – in response to comments from London Gypsies and Travellers (Responder ID 294)
MM51	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11. Part D – <u>“The Council will support the delivery of windfall sites to help meet the accommodation needs of Camden’s Traveller community.</u> The Council will require new sites, pitches and/or plots for Travellers to:"	To respond to the comments from the GLA (Responder ID 13)
MM52	Policy H11 Accommodation for travellers		Propose the following modification to Policy H11.Part D (following criteria 8) - <u>9. be designed in consultation with representatives of the local Traveller community.</u> <u>Applications for new sites, pitches and/or plots for Travellers should be accompanied by a detailed Management Plan.</u>	For clarity – in response to comments from London Gypsies and Travellers (Responder ID 294)
MM53	Policy H11 Accommodation for travellers	Para 7.361	Propose the following modification to Paragraph 7.361 – “The London Plan 2021 indicates that boroughs should update their Gypsy and Traveller accommodation needs assessments as part of the Local Plan review process. To inform the review of	To respond to the comments from the GLA (Responder ID 13)

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			<p>the London Plan, the GLA have undertaken are carrying out a London-wide Gypsy and Traveller Accommodation Needs Assessment. The provisional findings of the emerging Gypsy and Traveller Accommodation Needs Assessment identify a need for 11 additional pitches in Camden by 2031/32. The overall need for the period covered by the new Local Plan (to 2041) will however be higher, and is assessed estimated to be 19 additional pitches (including the 4 existing pitches in Camden).”</p>	<p>This modification is superseded by MM77 (see below)</p>
MM54	Policy H11 Accommodation for travellers		<p>Propose to insert two new paragraphs after paragraph 7.364 –</p> <p><u>“It is envisaged that the land adjacent to Constable House (Site Allocation C27) could accommodate two Gypsy and Traveller pitches and that the land at York Way Depot and adjacent land at Freight Lane (Site Allocation S20) could accommodate up to four Gypsy and Traveller pitches. However, further design and feasibility work will be required to establish the exact number of pitches that can be delivered on these sites. A further pitch has also recently been provided on the existing Traveller site at Carol St in Camden, which also counts towards meeting the identified need.</u></p> <p><u>This means there is a shortfall of 6 pitches against the Council's ten year pitch target of 13 pitches to 2035/36. Given this, Policy H11 supports the delivery of windfall sites (unallocated sites) to help meet this need subject to the criteria set out in Policy H11 Part D.”</u></p> <p>Subsequent paragraph numbering will need to be updated.</p>	<p>To respond to the comments from the GLA (Responder ID 13)</p>

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM55	Policy CC2 Prioritising the retention of existing buildings		Propose the following modification to Policy CC2 Part B – "Developers considering the substantial demolition of existing buildings will be expected to undertake the following assessments, before progressing detailed proposals for submission: 1. a condition and feasibility assessment, which should be undertaken at the earliest opportunity; and 2. <u>where appropriate, a</u> development options appraisal....	For clarity – to respond to comments made by the London Property Alliance (Responder ID 637) and others
MM56	Policy CC2 Prioritising the retention of existing buildings		Propose the following modification to Policy CC2 Part C – "The Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council's satisfaction that: 1. there are significant structural issues with the existing building that would prevent it from being retained and improved; <u>or</u> 2. the developer has comprehensively explored a range of feasible alternative development options, informed by the condition and feasibility assessment, prior to considering substantial demolition, and it has been demonstrated to the Council's satisfaction that the existing building cannot be retained or improved; <u>and</u> 3. the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and optimises site capacity."	For clarity - to respond to comments made by the London Property Alliance (Responder ID 637) and others
MM57	Policy CC2 Prioritising the retention of existing buildings	8.15	Propose to insert the following new paragraph after paragraph 8.15 – <u>Furthermore, where the condition and feasibility assessment shows that there may be significant structural issues present, which mean the retention of the existing building is not feasible, a development options appraisal will not be required.</u> Subsequent paragraph numbering will change.	For clarity - to respond to comments made by the London Property Alliance (Responder ID 637) and others

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM58	Policy CC3 Circular economy and reduction of waste		Propose the following modification to Policy CC3 Part C - "The Council will require applications for new build major development (and major development which involves substantial demolition and rebuild) to submit a Circular Economy Statement.	For clarity - to respond to comments from Hilson Moran (Responder ID 507)
MM59	Policy CC4 Minimising Carbon Emissions		Propose the following modification to Policy CC4 Part B - "The Council will require applicants proposing developers for all new build major development or and all development proposing substantial demolition to submit a Whole Life Cycle Carbon (WLC) emissions assessment.	For clarity – to respond to comments from Unite (Responder ID 618)
MM60	Policy CC4 Minimising carbon emissions		Propose to insert the following text in Policy CC4 - <u>C. All major development will be required to submit a post construction Whole Life Cycle Carbon Assessment in line with London Plan Guidance on Whole Life Carbon Assessments.</u>	To align with London Plan Guidance on Whole Life Carbon Assessment - to respond to comments from Unite (Responder ID 618)
MM61	Policy CC4 Minimising carbon emissions	8.52	Propose to insert the following text at the end of paragraph 8.52 – <u>Where the Council considers an applicant has not fully assessed the whole life carbon of a proposal, an independent review of the Whole Life Cycle Carbon Assessment will be requested, to be paid for by the developer, and its recommendations should be implemented where feasible.</u>	To provide further information - to respond to comments from Hilson Moran (Responder ID 507)
MM62	Policy CC9 Water efficiency		Propose the following modification to Policy CC9 Part A 2 - "require all residential development to meet the optional requirement for water efficiency set out in Part G of the Building Regulations of 110 litres per person per day (including 5 litres for external water use), <u>or any higher standard that may be adopted</u> . Proposals will be strongly encouraged to reduce daily water use even further than this where possible;"	For clarity – to respond to comments from Thames Water (Responder ID 409)

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MM63	Policy CC9 Water efficiency		Propose the following modification to paragraph 8.124. After the bullet point list include - <u>The Council will expect developers to demonstrate that they have taken a fittings-based approach to comply with the optional requirement for water efficiency in Part G of the Building Regulations, as set out in Table 2.2 of the Regulations.</u>	For clarity – to respond to comments from Thames Water (Responder ID 409)
MM64	Policy CC11 Sustainable drainage		Propose the following modification to Policy CC11 Part E - "In the Counters Creek catchment area (shown on the Planning Policies Map) applications for basement development, and other development vulnerable to flooding in areas identified at risk of flooding, should seek to reduce surface water run-off rates to be as close to <u>go beyond</u> the greenfield run-off rate as <u>where</u> feasible."	For clarity – to respond to comments from Thames Water (Responder ID 409) and Redington Frogna! Neighbourhood Forum (Responder ID 251)
MM65	Policy SC6 Cultural facilities		Propose the following modification to Policy SC6 Cultural facilities Part D – "Where a proposal includes a new or relocated cultural facilities, or additional floorspace, the Council will expect require the applicant to provide the following, where <u>appropriate</u> :"	For clarity - in response to comments from the British Museum (Responder ID 594)
MM66	Policy NE2 Biodiversity		Propose the following modification to Policy NE2 Part A.5 - "expect suitable developments to integrate measures to support wildlife, including swift bricks, bat/bird boxes, bee bricks and permeable fencing garden borders, such as hedges. "	For clarity - to respond to comments from Redington Frogna! Neighbourhood Forum (Responder ID 251)
MM67	Policy D1 Achieving design excellence		Propose the following modification to Policy D1 Part A - All development in Camden must achieve excellence in the architecture and design of buildings and places, responding to the climate <u>and ecological</u> emergency, improving the health and	For clarity - to respond to comments from Redington Frogna! Neighbourhood

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
			well-being of our communities, and celebrating Camden's diversity of people and place.	Forum (Responder ID 251)
MM68	Policy D1 Achieving design excellence		Propose the following modification to Policy D1 Part D - Developers must evidence how they have responded positively to the design policies in the Local Plan, and associated guidance <u>and any relevant Neighbourhood Plan</u> , as part of the Design and Access Statement submitted with their planning application.	For clarity - to respond to comments from Redington Frognal Neighbourhood Forum (Responder ID 251)
MM69	Policy D1 Achieving design excellence		Propose the following modification to Policy D1. Part B.3 - preserve <u>conserve</u> or enhance the historic environment and heritage assets in accordance with Policy D5 (Historic Environment);	To ensure consistency in wording across the Plan - in response to comments from the British Museum (Responder ID 594)
MM70	Policy D2 Tall buildings		Propose the following modification to Policy D2, Part C.8 - the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets (<u>including in neighbouring boroughs where impacted</u>) in accordance with Policy D5 (Historic Environment).	To respond to comments made by LB Islington (Responder ID 606)
MM71	Policy D6 Basements		Propose the following modification to Policy D6 Part C.3 - "...not exceed the footprint of the host building in-area , except for works to create a lightwell or access to the basement"	For clarity – to respond to comments from Hampstead Neighbourhood Forum (Responder ID 22)

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM72	Policy D6 Basements		Propose the following modification to Policy D6 Part A.1 - 'neighbouring properties <u>and infrastructure</u> '.	For clarity – to respond to comments from TfL (responder ID 604)
MM73	Policy A3 Air quality		Propose the following modification to Policy A3 Part A. 2. a. "all major developments (<u>10 or more dwellings provided, 1,000 square metres or more floorspace</u>)	For clarity – in response to comments from Kentish Town Neighbourhood Forum (Responder ID 615)
MM74	Policy A3 Air quality	13.67	Propose to insert the following text at the end of paragraph 13.67 - <u>If the AQA includes an assessment of laboratory flues, or consideration of other emissions which need specialist consideration, then the Council will seek independent verification of the assessment, to be paid for by the developer.</u>	For clarity
MM75	Policy H11 Accommodation for Travellers.	7.357	Propose the following modification to Paragraph 7.357 – The Council has a responsibility through national planning policy to assess and plan for the housing needs of all residents, including the Gypsy and Traveller community. There is an established community of Travellers in Camden that have lived in the borough for over thirty years, and which we recognise have longstanding connections with local social networks and services. The Council currently provides five traveller pitches (four at Carol Street and one at Castlehaven Road). <u>This reflects the fact that a further pitch has recently been provided on the existing Traveller site at Carol St in Camden, which counts towards meeting the identified need.</u> There is also a private site for travelling showpeople at the Vale of Health, which has been in use since at least the 1950s. Known as the North Fairground site, the yard also hosted a fair on bank holidays until the early 2000s.	For clarity

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM76	Policy H11 Accommodation for Travellers.	7.358	Propose the following modification to Paragraph 7.358 – The Provisional findings of the emerging GLA London-wide Gypsy and Traveller Accommodation Needs Assessment do not include any identified need for additional plots for Travelling Showpeople in Camden.	To reflect the fact that the GLA London-wide Gypsy and Traveller Accommodation Needs Assessment has now been finalised and published
MM77	Policy H11 Accommodation for Travellers.	7.361	Propose the following modification to Paragraph 7.361 – “The London Plan 2021 indicates that boroughs should update their Gypsy and Traveller accommodation needs assessments as part of the Local Plan review process. To inform the review of the London Plan, the GLA have undertaken are carrying out a London-wide Gypsy and Traveller Accommodation Needs Assessment. The provisional findings of the emerging Gypsy and Traveller Accommodation Needs Assessment identify a need for 11 additional pitches in Camden by 2031/32. The overall need for the period covered by the new Local Plan (to 2041) will however be higher, and is assessed estimated to be 19 additional pitches. <u>This includes the four existing pitches that were provided in Camden at the time the assessment was undertaken. Since then a further pitch has been provided on the existing Traveller site at Carol St in Camden, which counts towards meeting the identified need.</u>	For clarity and to reflect the fact that the GLA London-wide Gypsy and Traveller Accommodation Needs Assessment has now been finalised and published This modification supersedes MM53 above

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM78	Policy H1 Maximising housing supply		Propose the following modification to Policy H1 Part 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:	To correct a typographical error
MM79	Policy IE2 Offices		Propose the following modification to Policy IE2 Part C - The loss of offices in the borough will only be considered acceptable where a comprehensive and sustained marketing campaign has been undertaken for at least 12 months, which uses a variety of agents <u>which uses at least one recognised agent with appropriate and relevant expertise</u> and is based on a realistic rent. The marketing evidence should demonstrate that suitable economic uses have been fully explored and evidenced to the Council's satisfaction, with consideration given to the feasibility and viability of the following:	To provide greater flexibility – in response to Q8 in Matter 5 of the Inspector's Matters, Issues and Questions
MM80	Policy IE2 Offices	9.36	Propose the following modification to Paragraph 9.36 - The Council has an established process for dealing with situations where offices become obsolete. In such cases, we will expect the provision of marketing evidence to show that there is no potential interest from occupiers and that marketing has been undertaken based on a realistic rent (guided by average local market values for similar space). As a minimum, the marketing should be conducted over a 12-month period and by at least two agents with knowledge of local property markets- <u>by at least one agent with knowledge of local property markets and a track record in the sale and letting of offices.</u>	To provide greater flexibility – in response to Q8 in Matter 5 of the Inspector's Matters, Issues and Questions

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM81	Policy IE5 Hotels and visitor accommodation		Propose the following modification to Policy IE5 Part B.2 - support smaller and medium-sized hotels (<u>less than 2,500sqm GIA</u>) and visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road / Swiss Cottage and in locations with an established commercial or mixed-use character in the Central Activities Zone;	For clarity – in response to Q23 in Matter 5 of the Inspector’s Matters, Issues and Questions
MM82	Policy SC3 Social and community infrastructure		Propose the following modification to Policy SC3. Part B – The Council will seek planning obligations to secure contributions towards new and improved social and community facilities and services <u>necessary</u> to mitigate the impact of development.	For clarity
MM83	Policy SC6 Cultural facilities	10.103	Propose to insert a new paragraph following paragraph 10.103: <u>“In order to assess the impact of a proposal for a new or relocated cultural facility or additional floorspace, the Council will expect the applicant to provide evidence in line with Part D of the Policy. The Council recognises however that the level of evidence required to make a robust assessment will vary dependant on the nature and scale of the proposal, with a greater level of evidence required to support a proposal for a new cultural facility, compared to the delivery of additional floorspace at an existing cultural facility. Given this, the Council will encourage applicants to take a proportionate approach when providing evidence in accordance with Part D of the Policy.”</u> Subsequent paragraphs will need to be re-numbered.	For clarity – in response to Q14 in Matter 6 of the Inspector’s Matters, Issues and Questions

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM84	Policy T1 Safe, Healthy and Sustainable Transport		Propose the following modification to Part A (6) of Policy T1 Safe, Healthy and Sustainable Transport - not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure projects, <u>including Crossrail 2.</u>	For clarity – in response to TfL’s comments in the Statement of Common agreed with the Council (ED03I)
MM85	Policy D1 Achieving Design Excellence		Propose the following modification to criterion B4 of Policy D1: “ <u>respect consider</u> local views and preserve protected strategic views”	For consistency – in response to Q10 in Matter 7 of the Inspector’s Matters, Issues and Questions
MM86	Policy S8 St Pancras Hospital	Other considerations	Propose the following modification to Site Allocation S8 ‘Other Considerations’ – insert an additional bullet point under bullet point 5 <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To reflect that the site is in an Archaeological Priority Area
MM87	Policy S9 Shorebase Access	Other considerations	Propose the following modification to Site Allocation S9 ‘Other Considerations’ – insert an additional bullet point under bullet point 2 <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To reflect that the site is in an Archaeological Priority Area
MM88	Policy C5 369 – 377 Kentish Town Road	Other considerations	Propose the following modification to Site Allocation C5 ‘Other Considerations’ – insert an additional bullet point under bullet point 3 <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To reflect that the site is in an Archaeological Priority Area

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM89	Policy C5 369-377 Kentish Town Road	Other considerations	Propose the following modification to Site Allocation C5 'Other Considerations' – insert an additional bullet point under bullet point 2 <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To reflect that the site is in an Archaeological Priority Area
MM90	Policy W8 88-92 Kilburn High Road	Other considerations	Propose the following modification to Site Allocation W8 'Other Considerations' – insert an additional bullet point under bullet point 2 <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To reflect that the site is in an Archaeological Priority Area
MM91	Policy N3 Queen Mary's House	Other considerations	Propose the following modification to Site Allocation N3 'Other Considerations' – insert an additional bullet point under bullet point 4 <u>This site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</u>	To reflect that the site is in an Archaeological Priority Area
MM92	Site Allocation Policy S5 120–136 Camley Street	Context.	Propose the following modification to Site Allocation S5 'Context' - insert an additional bullet point under bullet point 2. <u>The northern tip of the site is adjacent to the Camden Square Conservation Area.</u>	To reflect that the site is adjacent to a conservation area.
MM93	Site Allocation Policy S7 24-86 Royal College Street (Parcelforce and ATS Tyre Site)	Context.	Propose the following modification to Site Allocation S7 'Context' - bullet point 1 to read - The site is in close proximity to the Regent's Canal and King's Cross St Pancras Conservation Areas, although the existing buildings are not within a conservation area and are not identified as heritage assets. A number of properties on Royal	To reflect that the site is also adjacent to locally listed buildings.

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
			College Street and Pratt Street are Grade II listed <u>or locally listed.</u>	
MM94	Site Allocation Policy S11 Former Royal National Throat, Nose and Ear Hospital	context	Propose the following modification to Site Allocation S11 'Context' - amend bullet point 2 to read - The site is within the King's Cross St Pancras Conservation Area. The Bloomsbury Conservation Area is located on the opposite side of Swinton Street to the south <u>where there is a terrace of Grade II listed buildings. Part of 75 Wicklow Street, which is Grade II listed falls, within the site boundary.</u>	To reflect that the site is also adjacent to listed buildings.
MM95	Site Allocation Policy S15 Land to rear of British Library	Context	Propose the following modification to Site Allocation S15 'Context' - insert an additional bullet point under bullet point 4 - <u>The site is adjacent to a Grade II listed building on Ossulston Street and the Grade I listed St Pancras Station. The King's Cross St Pancras Conservation Area is adjacent to the site to the east.</u>	To reflect that the site is adjacent to listed buildings.
MM96	Site Allocation Policy C2 Regis Road and Holmes Road Depot	Context	Propose the following modification to Site Allocation C2 'Context' - insert an additional bullet point between bullet point 3 and 4 - <u>The part of the site which is currently home to the Holmes Road depot is adjacent to the Inkerman Conservation Area and opposite a Grade II listed building. The listed Police Station House is also adjacent to the Regis Road site boundary (Allocation C4).</u>	To reflect that the site is adjacent to a conservation area and listed buildings.
MM97	Site Allocation Policy C3 Murphy Site	Context	Propose the following modification to Site Allocation C3 'Context' - insert an additional bullet point under bullet point 2. <u>Adjacent to the site, to the southwest, are Grade II listed buildings: Christ Apostolic Church, 1- 7 Highgate Road and The Forum, Highgate Road. There are also locally listed buildings within the site (the Locomotive Sheds) and immediately adjacent to the site (53 – 79 Highgate Road).</u>	To reflect that the site is adjacent to listed and locally listed buildings.

Reference No	Policy	Paragraph	Proposed Modification	Reason for Modification
MM98	Site Allocation Policy C3 Murphy Site		Propose the following modification to Site Allocation C3 criterion 19 - 'seek to retain and reuse the locally listed locomotive sheds and the attached and adjacent ancillary structures as a key feature any development, <u>and respect the adjacent listed buildings.</u> '	To ensure that any impact on the adjacent listed buildings is mitigated
MM99	Site Allocation Policy C19 Arlington Road former depot site	Context	Propose the following modification to Site Allocation C19 'Context' - insert an additional bullet point under bullet point 2. <u>The site is adjacent to the Primrose Hill and Regent's Canal Conservation Areas. Opposite the site is the Grade II listed Arlington House. The site backs on to the gardens of Grade II listed properties on Gloucester Crescent. Adjoining the site to the west are locally listed buildings at 61-85 Jamestown Road.</u>	To reflect that the site is adjacent to a conservation area and listed and locally listed buildings.
MM100	Site Allocation Policy W2 O2 Centre, carpark and car showroom sites and 14 Blackburn Road	Context	Propose the following modification to Site Allocation W2 'Context' - insert an additional bullet point under bullet point 2. <u>The South Hampstead Conservation Area lies to the south of the site on the other side of the railway tracks, and the Fitzjohns Netherhall Conservation Area lies to the east of the site on the other side of the Finchley Road. There is a terrace of locally listed buildings (227 – 239 Finchley Road) in proximity to the site.</u>	To reflect that the site is adjacent to a conservation area and locally listed buildings.