

Camden Local Plan Proposed Submission Draft 2025

Inclusive Economy Topic Paper

October 2025

1 Introduction

- 1.1 The Camden Local Plan Proposed Submission Draft was published for consultation and engagement from the start of May to the end of June 2025. Following this, the Plan was then submitted to the Planning Inspectorate for examination in public at the beginning of October 2025.
- 1.2 This topic paper supports Policies IE1 to IE10 in the Camden Local Plan Proposed Submission Draft 2025. It provides further background and information the Council's proposed approach for delivering an inclusive economy in the borough.

2 Background

- 2.1 Camden has a dynamic economy with high performing growth sectors and significant research and knowledge-based activities represented by institutions and companies with a national and international profile. This includes the technology and science sectors; medical and educational uses; consultancy and a wide range of creative industries. LB Camden's '[State of the Borough](#)' report 2025 notes that Camden has the highest number of businesses in London after Westminster. There were 36,920 businesses operating in 2024, representing a 4% increase from 2023. In 2022, there were 432,000 jobs in Camden, 2.8 jobs for every working-age resident.
- 2.2 However, this masks significant income and employment inequalities, with the proportion of economically active residents currently below rates in London and England. The cost of living, and particularly housing costs, is resulting in a situation where significant numbers of Camden households are living in poverty, with increasing numbers of those working reporting a lack of disposable income. Camden is one of the most expensive places to live in the country, but median levels of pay are now lower than the London average.
- 2.3 Rents for commercial space in Camden are high and some of the most flexible space has been lost over the last 15 years due to the impact of permitted development rights. The cost of premises is a significant barrier for small and medium enterprises and start-ups, and once businesses have become established it can be difficult finding suitable space to support their expansion. One of the six overarching ambitions of 'We Make Camden', the Council's vision for the future of the borough, is that "Camden's economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life".
- 2.4 Since the current Local Plan was adopted in 2017, many implemented planning permissions have involved the provision of new, large and refurbished office buildings built to a high specification (category A+). This has reflected market demands and the continuing attractiveness of key office markets in the borough such as 'Mid Town' (loosely the Holborn area) and parts of the 'West End' such as Fitzrovia. The Knowledge Quarter innovation

district, centred on King's Cross and Euston, has seen the delivery of 'best in class space' for institutions and multi-national companies, in some cases forming hybrid uses bringing together elements of laboratory space and more traditional office space.

- 2.5 These trends have largely been sustained post-pandemic, with investors / developers looking for high meeting and collaboration spaces that support the 'return to the office', premises that can demonstrate strong sustainability credentials (reducing the risks associated with the leasing of premises, i.e. Minimum Energy Efficiency Standards), and offering flexibility in terms of the uses they can support and sustain over time. The demand for new / refurbished premises continues to be greatest in areas with a well-established office market, clusters of related/similar uses and excellent connectivity such as the locations mentioned above.
- 2.6 The current Camden Local Plan envisaged that a significant proportion of office floorspace need (over 400,000sqm) would be met within the King's Cross Opportunity Area. The King's Cross Central development is now nearly fully implemented, and has transformed the economic landscape around King's Cross, meaning that this area now sits firmly within London's Central Activities Zone (CAZ). Regeneration is now being proposed in nearby areas focussed on land adjoining the Regent's Canal and Camley Street. A number of site allocations in the draft Local Plan relate to this area. Although, there remains uncertainty about the eventual form and mix of development that will come forward at Euston, several schemes have been delivered for knowledge economy uses in proximity to Euston Station, with permission recently granted for the redevelopment of Euston Tower.
- 2.7 Development in Camden to a considerable extent reflects changes in the structure of the economy in London and England as a whole. Over the last fifty years, manufacturing and heavy industry have largely been replaced by light industrial and logistics uses. In Camden, following the shift of multiple forms of goods traffic from rail to road, extensive yards and sidings were repurposed as low density industrial sites and 'big box' retail. (Examples are the sites allocated in the Draft Local Plan at Regis Road (C2), Morrisons Supermarket (C7) and the O2 Centre, car park and car showroom sites (W2).) Common to these sites are extensive highway and parking space. As land values have risen and development opportunities in the borough have become scarcer, such locations represent some of the best opportunities to intensify employment uses as part of comprehensive mixed-use schemes, including housing. One such site, Murphys in Kentish Town (C3), is within the Industry Area designated in the Local Plan / Policies Map. This is equivalent to the 'Locally Significant Industrial Site' (LSIS) designation in the London Plan. Although there is a demand for industrial type premises in Camden, there has been virtually no additions to the stock this century and some premises are in poor condition. This likely reflects the constrained land supply position in Camden, proximity of some employment sites to residential uses, and significant investment in major, strategic employment areas in outer London.

- 2.8 The stock of smaller and medium sized employment sites in the borough includes premises built in the 19th and early 20th century to support trades that have declined or relocated to locations offering larger spaces and/or lower operating costs. The introduction of permitted development rights aimed at increasing the supply of housing resulted in the significant loss of such premises, including viable studio and workshop spaces, disproportionately impacting on areas such as Kentish Town and Camden Town. To address this loss, and the consequential inflationary pressures on business rents, the Council brought forward [Article 4 directions](#) in Central London, town centres and employment clusters to ensure that the local economy and livelihoods are not harmed through inappropriate changes of use.
- 2.9 While Camden has many of the features of a successful economy, such as its overall size, the range of sectors and proportion of high growth businesses, there is an insufficient supply of premises to support the growth of emerging sectors, a limited supply of sites for specialist uses, such as purpose-built laboratories and research space, and difficulties finding accommodation to support makers, local supply chains and smaller enterprises.
- 2.10 As part of their role, the Council's Inclusive Economy service seek to ensure that development schemes contribute towards delivering positive social and economic impact and benefits for residents in terms of employment skills and training programmes. They are also responsible for the delivery of the Council's [Affordable Workspace Strategy](#) and advise on the employment elements of Council regeneration schemes within its [Community Investment Programme](#) (CIP). The Inclusive Economy service and Camden's Planning service both have frequent interactions with developers and investors, which provides a strong understanding of changing needs and demands for different business uses.
- 2.11 The draft Local Plan [Policies Map](#) (SD10) shows Camden's network of centres – five CAZ Retail Clusters, six Town Centres, 39 Neighbourhood Centres and six Specialist Areas. The Council undertakes regular monitoring of the health of the borough's centres and, while the growth of online shopping has resulted in changes to the 'offer' of goods and services within individual centres, the vast majority of centres of Camden continue to be healthy with relatively low levels of vacancy. Some centres have now recovered or surpassed their performance in terms of vacancy, expenditure and/or footfall compared to the pre-pandemic situation. Camden is renowned for its markets, which retain an important visitor and tourism role, and helping to sustain the vitality of centres in which they are located.
- 2.12 It is evident, however, that risks and challenges remain, linked to changing consumer habitats and pressures on household expenditure, meaning that planning policies for our centres need to be sufficiently flexible. As elsewhere in London and England, there has been a shift towards businesses providing food, drink or entertainment uses and local services. Also, since the current Local Plan was adopted, there has been particular growth in app-based food and drink delivery companies with a number of companies now operating 'dark kitchens' in the borough.

- 2.13 London, and Camden, has also seen very significant demand for new hotels and visitor accommodation. Many developers of sites in Central London are seeking flexibility to provide hotels because of the relatively stable market demand and London's attractiveness as a destination for tourists
- 2.14 There are concerns about the proliferation of some land uses and the need for mitigations to ensure they are appropriately managed. This relates to evening and night time uses, hot food takeaways, gambling uses and delivery-led food businesses. Each of these uses have their own particular challenges but a common thread are the impacts on residents/communities living nearby and public health concerns. While planning policy is one mechanism, their effective management is reliant on 'system-wide' approaches, involving Council services / actions beyond planning.

3 Policy Context

National context

National Planning Policy Framework (NPPF)

- 3.1 The NPPF states that "planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt." This should allow "each area to build on its strengths, counter any weaknesses and address the challenges of the future" (paragraph 85).
- 3.2 Planning policies should set out a clear economic vision and strategy which "positively and proactively encourages sustainable economic growth..." paying "particular regard to facilitating development to meet the needs of a modern economy" and "... be flexible enough to accommodate needs not anticipated in the plan". Strategic sites for investment should be identified and barriers to investment such as inadequate infrastructure and housing should be addressed (paragraph 86).
- 3.3 The NPPF also emphasises the "specific locational requirements" of knowledge / data-driven, creative and high technology industries, storage and distribution at a variety of scales to allow for "efficient and reliable handling of goods" and support the expansion and modernisation of industries important for growth and resilience (paragraph 87).
- 3.4 Planning policies and decisions should also "... support the role that town centres play at the heart of local communities and should take a positive approach to their growth, management and adaptation". Planning policies should also define a network and hierarchy of town centres, "allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses... and reflects their distinctive characters". Policies should also define the extent of town centres and primary shopping areas, recognise that residential development often plays

an important role in ensuring the vitality of centres, seek to retain and enhance markets and allocate suitable sites to "...meet the scale and type of development likely to be needed, looking at least ten years ahead" (paragraph 90).

- 3.5 Local planning authorities are also expected to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. When planning applications for retail and leisure development comes forward outside town centres and is not in accordance with an up-to-date plan, then the LPA should request an impact assessment, with a default threshold of 2,500sqm of gross floorspace suggested (paragraphs 91 and 94).

The UK's Modern Industrial Strategy, UK Government, June 2025

- 3.6 The Strategy is focussed on the "*critical need to increase business investment*" to capture a greater share of internationally mobile capital, spur domestic businesses to 'scale up' and support small and medium-sized businesses. Eight sectors ('the IS-8') are identified and which are on average 27% more productive than the UK average. Of these sectors, four are well-represented in Camden and important to the borough's growth prospects: Digital and Technology, Creative Industries, Life Sciences and Professional & Business Services. Two further sectors: Financial Services and Clean Energy, are also represented in the borough, although to a lesser degree.

Regional context

London Plan 2021

- 3.7 Policy E1 in the 'Economy' chapter of the London Plan supports improvements to the quality, flexibility and adaptability of offices, including increases in the stock of offices in the Central Activities Zone (CAZ). Outside of the CAZ, offices should be focussed in town centres. The policy also states that offices should be retained where viable, with surplus capacity released for other uses, with the re-provision of smaller commercial units explored. It also states Boroughs should protect a range of B use class business spaces, with proposals involving the loss of space demonstrating that there is no reasonable prospect of the site being used for business purposes. Boroughs are encouraged to consider bringing forward detailed affordable workspace policies "in light of local evidence of need and viability".
- 3.8 The chapter also sets out the London wide approach to managing changes in industrial land and uses. Boroughs should ensure that a sufficient supply of land and premises is provided and maintained for industrial and related functions taking account of the "*potential for intensification, co-location and substitution*". The release of land should contribute to other planning priorities including housing. Further detail is provided for proposals involving intensification and co-location. Consolidation of an LSIS can support the delivery of housing and other uses but must form part of a co-ordinated

masterplanning process. Mixed-use or residential development proposals involving industrial sites can be promoted through site allocations.

- 3.9 The London Plan states that boroughs should identify future requirements and locations for new retail development having regard to local evidence and supply (including additional capacity for comparison and convenience shopping). There are restrictions on the provision of A5 hot food takeaways (which should not be permitted within 400 metres walking distance of a school). Boroughs should ensure that there is a sufficient supply and range of serviced accommodation (defined by the London Plan as including hotels, bed and breakfasts, guest houses, and hostels where services such as catering and cleaning are provided to guests). Within the Central Activities Zone (CAZ), “strategically important serviced accommodation” should be directed to Opportunity Areas, with smaller provision elsewhere except for wholly residential streets or predominantly residential neighbourhoods.
- 3.10 Within the CAZ, office space should be provided to meet the demand for a range of types and sizes of occupier and rental values. The area’s unique concentration and diversity of arts, entertainment, night-time economy and tourism functions should also be protected and enhanced. Sufficient capacity for industry and logistics should be identified and protected, including for last mile distribution and freight consolidation facilities to support the needs of businesses within the CAZ. Town centres are seen as a significant opportunity for commercial activity beyond the CAZ. Housing intensification and mixed-use redevelopment should be considered for low density commercial sites, car parks and retail parks.

The London Growth Plan 2025

- 3.11 The Mayor of London has recently published [The London Growth Plan](#). This is intended to guide action by policy makers and decision makers across London towards achieving economic growth and inclusion. While it is not a formal planning document, it shares some of the objectives of the draft Local Plan and aligns with ambitions set out in [We Make Camden](#), the Council’s Corporate Strategy. The London Growth Plan aims “to create an economy that works for all Londoners, making our city more equal as well as more prosperous”. It sets four main ambitions:
- Productivity – raise productivity growth rates to 2% on average per year from 2025 to 2035.
 - Inclusion – raise the real household weekly income (after housing costs) of the lowest earning 20% of Londoners by 20% by 2035.
 - Green growth – accelerate progress towards achieving London’s net zero target for 2030
 - A global capital – grow London’s services exports by an average of 6% per year.
- 3.12 The Plan states that there will continue to be emphasis on growing financial, professional and business services, creative industries, the experience economy and education noting the transformation of these sectors through technology and digital products. It also notes the need to be a “frontier creator

of breakthrough technologies and solutions” given London’s strengths in research, life sciences, AI and green technology. Many of these sectors are ones in which Camden has strong representation and are expected to be important to the borough’s economic growth over the plan period. Supporting the growth plan is an ‘inclusive talent strategy’ responding to the shortage of skilled workers, low skills and low economic participation and the constraints these have on growth.

4 Local context

Camden Local Plan 2017

- 4.1 The Plan’s ‘Economy and jobs’ chapter sets out that the demand for office space is expected to increase by 695,000sqm from 2014 to 2031, with nearly two-thirds of this being delivered through permissions at King’s Cross Central. This scheme has now largely been implemented.
- 4.2 The Plan sets out further detail on how employment sites and premises will be protected. Where proposals come forward involving “higher intensity redevelopment”, the level of employment floorspace should be increased or at least maintained and any redevelopment should retain “existing businesses on the site as far as possible” (Policy E2 Employment Premises and Sites). It also sets out that the Council will support tourism development and visitor accommodation and where tourism development and visitor accommodation of different sizes and nature should be located.
- 4.3 The adopted Local Plan also has six planning policies within Chapter 9 on Town centres and shops. This includes specific requirements relating to the proportion and size of retail, non-retail and food, drink and entertainment establishments in centre frontages (Appendix 4 - Centre frontages). This has not been carried forward to the draft Local Plan due to the introduction of greater flexibility for changes between different town centre uses at a national level, particularly the introduction of Class E.

Camden Planning Guidance (CPG)

- 4.4 The Council’s adopted Camden Planning Guidance supplementary planning document [‘Employment Sites & Business Premises’](#) (January 2021) sets out how marketing exercises should be conducted and how affordable SME space will be secured. This latter forms the basis for draft Local Plan Policy IE4 on Affordable Workspace. The CPG also provides details about employment and training support and the formula to be applied where proposals involve the loss of employment floorspace. The adopted [‘Town Centres and Retail’](#) CPG (January 2021) provides more detail about the character, role and function of the borough’s main centres and identifies primary and secondary shopping areas.

Evidence

- 5.1 The Council considers that the evidence base prepared for the Draft Local Plan is adequate, proportionate, relevant and up to date in line with the National Planning Policy Framework. The following paragraph set out the main sources of evidence that have informed the preparation of the Plan's approach to Delivering an inclusive economy.

Economic Needs Assessment December 2023

- 5.2 The [Economic Needs Assessment](#) carried out by Aecom (EB23) identifies the future need for office and industrial floorspace in the borough over the plan period (providing information on the period from 2023 to 2041).
- 5.3 The Study identified a net office floorspace requirement of 406,359sqm. This was considered to be "realistic given... consideration of employment space utilisation post-COVID" and "...accounts for the potential downsizing of offices as a result of increased home working." The data uses conservative assumptions around the utilisation of office floorspace (per worker). The total floorspace figure includes an allowance for vacant floorspace of 10% since vacant, available space can theoretically meet some of the identified needs. As of 1 April 2023, there was a pipeline of 211,028sqm of office floorspace (taking into account both gains and losses of space). Of this, a significant proportion (191,011sqm) was under construction. The include 76,137sqm from the Google building in King's Boulevard and various other major schemes in the Knowledge Quarter, such as Tribeca at 2-6 St Pancras Way, Belgrove House, and St Pancras Commercial Centre. More than half of the forecast growth was expected to come forward in 'Professional Services' and 'Computing and Information Services'.
- 5.4 The Study also considered there was likely to be a negative (albeit limited) requirement for industrial land based on their analysis of the existing supply of sites and past take rates of industrial land in the borough. It considered that "there is limited to no evidence to assume... that additional land requirements will be positive to 2041" given "... the constraints posed by Camden being an inner London borough with no vacant development land and limited development opportunity such that it can provide additional floorspace at scale."
- 5.5 The Study found that some employment sites and clusters surveyed for the Council's Employment Land Review 2014 had become fragmented (mainly due to the operation of permitted development rights). Although the rate at which industrial land was being lost had decreased in the most recent period (2015-2020), and there was a net positive position in terms of the pipeline of industrial land, AECOM considered that the majority of sites were unlikely to be able to accommodate 'intensified typologies' due to their size or limitations in terms of access.

LB Camden Affordable Workspace Strategy, October 2023

- 5.6 This Council [strategy](#) sets out a series of actions and commitments to support and grow small businesses and start-ups in Camden. It notes that, although the economy in Camden is strong, “too many local residents are not benefitting from the growth they see around them”. The strategy aims to “create the conditions for an inclusive economy”, involving local communities in creating growth, and using different ways to secure opportunities and benefits for Camden residents. The Strategy notes that whilst high value commercial sectors, and particularly large corporate enterprises, have been able to grow in the borough, smaller businesses are finding a range of financial challenges, particularly high and rising rents. The supply of certain types of space is below what is needed or even falling.
- 5.7 The Strategy explains how the Council will be using assets it owns or manages or is seeking to develop to increase the availability of affordable workspace, as well as space for particular specialisms. Responses include the Camden [Community Investment Programme](#) and the repurposing of underused spaces on housing estates to support social enterprise. The latter led to the publication of a [Vacant Spaces Prospectus](#) in 2025 to gauge interest in an initial list of LB Camden sites, to understand how they might be used and identify possible constraints and opportunities. While the Council will have a lead role in enabling the delivery of affordable workspace, a wide range of other organisations and community groups will be involved.
- 5.8 The Affordable Workspace Strategy also highlights the Council’s “influence over third party spaces and development” through the planning process, especially the use of Section 106 obligations to deliver affordable workspace over the long-term as well as meanwhile uses providing temporary spaces and ‘proof of concept’. The Local Plan is seen as a key enabler in terms of being a “responsive, relevant and practical framework to encourage and guide development... in ways that best meet local needs and priorities”.
- 5.9 The Council wishes to see affordable workspace support “residents and businesses that would otherwise struggle to secure premises on affordable terms” with early stage start-ups, social enterprises/VCS and the knowledge and research sectors being likely priorities for support. The Strategy notes that a diverse range of spaces are required including co-working office spaces, incubators and accelerators, ‘move-on’ spaces, labs, workshops, artist studios and retail space. There is also a need for bespoke workshops to support the Hatton Garden jewellery sector. The success of affordable workspace for some sectors and occupiers is likely to depend upon its immediate setting with enterprises wanting to be part of a working environment (or ‘ecosystem’) with other businesses and organisations with related interests to enable knowledge sharing and collaboration. For knowledge and research-based uses, location in an existing innovation cluster can be critical.

- 5.10 While headline rents are one of the greatest challenges, the Strategy also identifies other issues it will seek to address. This includes ensuring that entrepreneurs and start ups involved in high growth and knowledge-intensive activities are supported and retained in Camden as they grow. There is also reference to the need for high streets and centres to “unlock their entrepreneurial potential” as the ways in which they are used and the activities they support continue to change. For some neighbourhoods and estates, the provision of affordable workspace is described as having a more ‘market-making’ role: in such locations the supply of space is less of a concern than the need to improve economy opportunity more broadly and address gaps in the types of jobs and businesses available locally.

Camden Retail and Leisure Study (Lambert Smith Hampton) January 2024

- 5.11 [This study](#) (EB24 to EB26) included a shopping and leisure expenditure capacity assessment, based on the use of debit and credit card data, and taking into account GLA population forecasts, projections for future online market spend and assumptions about changes in floorspace productivity. The overall finding is that there is “a limited need at Borough level for new retail floorspace over the next ten years”.
- 5.12 The Study did identify potential capacity at centre level; however, this was “limited in scale and can, in our view, be accommodated by the reoccupation of existing vacant units, the inclusion of the appropriate type of retail floorspace within committed/proposed developments or changes to the retail use of existing Class E floorspace”.
- 5.13 The Study also incorporated a ‘health check’ for centres in the borough, which draws together changes in vacancies, the mix of uses and footfall to provide a ‘SWOT’ analysis, and, from this, sets out how well the centre is performing relatively to other centres in the borough and comments on its likely future potential.
- 5.14 The work also included a review of Camden’s existing network of centres. Changes were recommended to the status of a number of centres and changes to boundaries in some instances. These recommendations have been incorporated in the revised centre boundaries shown on the draft Local Plan [Policies Map](#) (SD10). This includes designation of new centres within the King’s Cross Central development (King’s Boulevard and Coal Drops Yard) and two other neighbourhood centres (in Haverstock Hill and King’s Cross Road) recognising where there are clusters of shops and services that have not been previously designated. Minor changes to various centres have also been made, mainly to reflect developments and changes of use since the designations were last reviewed.

Camden Local Plan Review Viability Study, Regulation 19 Update (BNP Paribas Real Estate) April 2025

- 5.15 [This tested](#) the viability impacts of the draft Local Plan's policies including IE4 on Affordable Workspace (EB01 and EB07). The results of this found that the provision of affordable workspace in office developments in the Central Area / Zone 1 / King's Cross area "should be deliverable, however this may need to be balanced with the Council's policy requirements for affordable housing". The inclusion of affordable workspace in office developments in Camden Town was also identified as viable on sites with lower existing use values. Office-led mixed-use developments in the Finchley Road/Swiss Cottage areas were also found to be viable where higher residential values are secured on sites with lower existing use values. Appraisals for lab-enabled research-led mixed-use developments in the south of the borough demonstrated "good viability".
- 5.16 In conclusion, the Study considered that the wording of draft policy IE4 "pragmatically and appropriately allows for the flexible application of its affordable workspace requirements from proposed developments including offices, research and development uses or light industry".
- 5.17 The Study also stated that it is the level of discount to market rents that has the greatest bearing on viability (more than the period of discount or the quantum of affordable workspace being secured).

LB Camden Public Health evidence on hot food takeaways and gambling-related uses (2023)

- 5.18 Camden's Health and Wellbeing department prepared [two evidence reports](#) (EB27 and EB28) to support draft Local Plan policies IE7 and IE8. The "Fast food takeaways and health and wellbeing in Camden: a review of availability and health impacts" report identifies the significant scale of public health concern about the prevalence of obesity and weight issues in the local population, where in 2021/22, half of all adults in Camden were overweight (up from 44% in 2015/16). Amongst children aged 5, 1 in 5 were overweight or obese, rising to 1 in 3 at age 11.
- 5.19 The report identifies the links between obesity and a 'food environment' where there is substantial and growing availability of energy-dense foods (poor in micronutrients and low in fibre). It notes the correlation between higher numbers of hot food takeaways and areas of multiple deprivation. It also found that there is an average of three takeaways within 400 metres of primary schools in the borough, with one school having 24 hot food takeaways within this distance. There are also several secondary schools with more than seven takeaways in the same proximity, and, in the case of one secondary school, at least 15 hot food takeaways are identified.
- 5.20 The report notes that the Council (and partners such as the NHS) have been pursuing a 'whole systems' approach to obesity where a range of actions are taken with the aim of halting and reversing growing trends; it states "Planning policies that seek to resist new fast food takeaways in inappropriate locations are one of the most important and effective actions..."

- 5.21 The “Gambling-related harm and vulnerability to harm in Camden: an evidence base in the context of planning policy” report identifies that gambling can have a major impact and be a source of serious harm to individuals, families and communities. The most socio-economically disadvantaged groups are experiencing the highest levels of problem gambling and have the greatest proportion of residents at risk of harm. Despite the rapid rise of online gambling over the last decade, the paper states that in-person gambling continues to represent a significant risk for gambling-related harm.
- 5.22 A Gambling Harm Vulnerability Index was used to establish the relative risk within Camden of being vulnerable to gambling. This shows that several town centres were areas of particular concern due to the clustering of premises such as bookmakers and adult gaming centres. This includes Camden Town, Kentish Town, Kilburn, King’s Cross, Somers Town and Fitzrovia. The paper recommends that these areas “should be prioritised for resisting new gambling premises because of the additional risk from the over-concentration of premises”.

6 Local Plan approach

- 6.1 As set out above, the Proposed Submission Draft Local Plan is a key mechanism for delivering a more inclusive and fair economy that provides good jobs and a wide range of training opportunities.
- 6.2 The Plan Delivering an inclusive economy chapter covers matter relating to employment and town centres. It has ten policies that “aim to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to, and share in, the borough’s economic growth”.
- 6.3 The policies carry forward much of the approach in the adopted Local Plan. Key changes are:
- A target of c400,000sqm additional office / R&D uses to be provided over the plan period. This includes potential employment growth at Euston towards the end of the plan period.
 - Clarification that employment and training strategies form a requirement for major schemes and office/refurbishment schemes involving over 3,000sqm of floorspace gross.
 - More detail on the kinds of employment and training initiatives financial contributions will be expected to support.
 - Where office buildings become redundant, the Council’s preferred alternative use is housing; this includes supporting the conversion of officed to student accommodation.
 - Proposals involving the loss of more than 4,000sqm of office floorspace should retain a proportion of affordable workspace, normally at ground floor level.
 - Further detail on how industrial and warehousing sites and land are to be protected and proposals involving intensification and co-location.
 - An affordable workspace policy which sets working benchmarks which all major office, R&D and light industrial schemes should aim to meet.

- An updated network and hierarchy of centres illustrated on the Local Plan Policies Map.
- Confirmation that there is no need at the present time to identify capacity or allocate sites to accommodate convenience or comparison retail, although additional capacity may be required at Euston and will be identified through the Euston Area Plan
- Greater emphasis on the importance of sustaining active ground floor uses in centres and widening the range of evening and night time uses.
- The introduction of policies to manage the impacts arising from hot food takeaways, gambling-related uses and delivery-led food kitchens.
- Proposals in markets should show how they contribute to the character, role and function of existing markets as well as the centre in which they are located. Major schemes should demonstrate how they contribute to a long-term vision for the market.

Affordable workspace

- 6.4 Providing discounted employment space in Camden improves access for small businesses and start-ups in sectors where high and rising rents are a significant barrier, e.g. creative workspaces and labs for life sciences. The draft Local Plan's Inclusive Economy policies, including Policy IE4 on Affordable Workspace will help to maintain a diverse economy catering for all business sizes and types, helping to retain businesses 'born' in the borough, supporting entrepreneurship and a wider range of employment opportunities. This is important for the resilience of the borough's economy. The Council's [Affordable Workspace Strategy](#) identifies the key constraints in terms of need and supply of affordable workspace in the borough. [Camden's Economic Needs Assessment](#) (EB23) notes that, while creative industries play a vital role in the economic and cultural landscape of the borough, they face "high operating costs" which can "pose challenges, particularly for small or emerging creative spaces with limited resources". It also found a decreasing supply of all types of industrial land with vacancy rates around zero.
- 6.5 Policy IE4 on Affordable Workspace was intended to build on the approach in the adopted Local Plan by providing greater clarity regarding the Council's expectations around affordable workspace and introduces off-site contributions in lieu of on-site provision where there is mutual benefit (that is, for the applicant and the borough) and enable inclusive economy initiatives to be delivered in other parts of Camden. Formally introducing the option of a PIL recognises the viability challenges of delivering affordable workspace (even at a 50% discount) for certain sectors, especially in the Central Activities Zone, as well as the particular challenges faced by knowledge and research uses where access to equipment and fit out can have a major bearing on the ability of start-ups to operate.
- 6.6 The draft policy has been worded in order to be flexible to reflect the different types of employment proposals that come forward in the borough and the clear differentials in land values and rents that exist geographically. Therefore, the target in IE4 of seeking 20% of new commercial floorspace to be provided

at 50% of market rents and for a period of 15 years is a “working benchmark” rather than as a fixed requirement. The Council intends to negotiate any affordable workspace ‘offer’ on a case-by-case basis; as part B of the policy notes: “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”. Further, as paragraph 9.61 the use of a payment-in-lieu (PIL) also provides flexibility in cases where it is not viable to provide affordable workspace on-site.

- 6.7 The option of a PIL also would mean that major schemes contribute towards the provision of affordable workspace on a more consistent basis and in ways that are likely to deliver most impact. Large employment developments tend to cluster in particular locations reflecting the demand for and profile of specific areas and a desire to be located with similar occupiers and uses. Further, employment premises will vary significantly in terms of their layout and the configuration of different uses in a building. The Council wishes to secure good quality space that will be impactful. Very small or constrained spaces are unlikely to be acceptable as it will be difficult to find suitable occupiers. For these reasons, the policy notes that spaces smaller than 300sqm will not be sought as they are harder to operate successfully (paragraph 9.61).
- 6.8 As set out in the Evidence section of this paper, the Council has tested the impact of the affordable workspace policy on viability. The Council’s [Viability Study](#) (EB01 and EB07) considered the approach was achievable in Camden’s main office locations depending on the existing use value of individual sites, development values and the amount of housing a site needs to provide through Council’s mixed-use policy H2, although it is acknowledged that there could be an impact in some development scenarios. The Study considered that these differentials in terms of viability could be addressed through ensuring that sufficient flexibility is built into the draft Local Plan policy (and consequently into negotiations at planning application stage). It considered that the Council’s approach as drafted was pragmatic and reasonable.
- 6.9 Draft policy IE4 also recognises that there are certain types of specialist and lab-focussed space being delivered in Camden, such as life sciences and some health uses where upfront capital expenditure costs can have a significant impact on viability, and occupation. In such cases, wider factors such as fit-out, provision of equipment, access to support networks and flexible lease terms are examples of potential matters that will need to be considered, alongside headline rents, as paragraph 9.64 acknowledges. The precise requirements will vary depending on the nature of the likely end use and whether there is a known future operator.

- 6.10 Taking a flexible approach also responds to how detailed planning obligations are secured in practice. Larger schemes will evolve through a pre-application process involving negotiation between developers and the Council, which can involve balancing different policies and aspirations. The overall aim of draft Policy IE4 is to secure “suitable and relevant spaces to support local entrepreneurship and deliver social impact” (paragraph 9.54). Achieving the best employment outcomes cannot be secured through rigidly applying the same approach to every site. Hence the need to consider factors such as size, level of discount, the period of the obligation in the round. As well as affordable workspace, the Council also seeks other employment and training benefits, such as apprenticeships and learning opportunities. These are also important for ensuring there are opportunities for residents to develop their skills and careers and therefore need to be taken into account as part of a scheme’s overall inclusive economy ‘offer’.

Offices

- 6.11 There are nationally significant office markets in the borough, including part of the West End (at Fitzrovia), Mid Town and King’s Cross. The pandemic caused unprecedented disruption to activity and resulted in a period of prolonged uncertainty over the future of the office. However, over the last 18 months, there has been a clear uptick in activity with leasing volumes higher and consequently, vacancy levels have declined. [Avison Young](#) reported that across Central London (by Q3 of 2024) office vacancy rates were down to 6.9%, closer to the 10 year average, with professional services and the technology and creative sectors considered to be driving take-up of leases and sectors that have a significant presence in Camden. A Director at the company is quoted as considering that: “Falling vacancy rates, and take up across London being substantially above the 10 year average, speaks volumes about the ongoing strength and attractiveness of London as a global business destination, and surely lays to rest any further debate about the future of offices”.
- 6.12 This recovery has continued into 2025. [BNP Paribas Real Estate](#) found that Q2 of 2025 was “a notably strong quarter for Central London office take-up... the half year figure marks a 30.3% uplift compared to H1 2024 and stands well above” five and ten year averages. BNPP considered this represented a “marked return in occupier confidence, particularly among larger corporate occupiers”. They also found that year-on-year office supply in Central London had fallen by 13.9% by the end of Q2 2025, with the contraction in space “driven by sustained occupier demand for best-in-class buildings, with continued demand for high quality stock”.
- 6.13 However, the resurgence in leasing activity has been sector specific and favoured premises able to offer the highest quality working environments in terms of their on-site amenity for employees (meeting areas, terraces etc.) and sustainability credentials. The draft Local Plan recognises that certain

older premises will no longer be suitable for continuing office use and supports their conversion to other uses, with preference given to proposals delivering additional housing capacity. Marketing exercises are therefore likely to remain an important tool in gauging the suitability and interest of investors and tenants in premises. Recognising the variable demands for office space, the draft Local Plan proposes to reduce the minimum marketing period to 12 months. The Council considers there are a range of factors to balance in determining the length of marketing exercises. Too short a period risks allowing the loss of offices where suitable tenants could realistically be found if a longer marketing period was applied. Too long a period could stifle investment or result in prolonged vacancy. A minimum period of 12 months is considered reasonable and appropriate and is consistent the period for evidence of vacancy and marketing in the adopted London Plan (paragraph 6.1.7).

- 6.14 The Council does not consider there is case for exempting certain types of office premises from marketing, as the Plan's approach allows for the testing of multiple aspects of a premises suitability (including size, age and configuration) and each case should be considered on its own merits.
- 6.15 The potential cost of retrofitting office premises to meet tightening energy efficiency and wider sustainability standards has been raised as a concern. In a relatively dynamic office market this should be less of an issue. Also, requirements such as EPCs (Energy Performance Certificates) do not apply to listed buildings and national restrictions on the leasing of premises with low EPC ratings take into account instances where the payback period is over a certain number of years (and the works would therefore be unviable). Nevertheless, the Council will give consideration to "exceptional challenges to improving the energy efficiency performance of offices" (paragraph 9.38) and where the applicant provides the satisfactory evidence of such issues, the Council may be prepared to waive the requirement for marketing.
- 6.16 The Council also considers that where the loss of office floorspace is being proposed, the applicant should give consideration to the reconfiguration of premises as a means of attracting tenants. Policy IE2 Part (C) continues the approach in adopted Local Plan Policy E2(b), which was found sound at examination ("that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been explored over an appropriate period of time"). We consider the approach is also consistent with adopted London Plan Policy E1 (G) and (H): "Development proposals related to new and existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace" and "The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored." Any such works would be subject to viability. The draft Local Plan threshold of 4,000sqm used in paragraph 9.39 is broadly equivalent to a large office

building of 7+ storeys. Therefore, it would not apply to smaller-medium sized offices where the viability challenge of re-providing space is likely to be greater.

Industrial capacity

- 6.17 The Local Plan focusses on safeguarding and intensifying existing industrial sites rather than identifying new sites. The Council does not consider it to be reasonable or practical for the Local Plan to set a target for industrial space given the highly constrained nature of the borough, the lack of sites to provide additional capacity and the critical need for the Local Plan to demonstrate that the borough is able to meet its housing target (either the current London Plan target or any future revised target). The Council's [Economic Needs Assessment](#) (EB23) states that "further loss of industrial land is unlikely to proceed at this rate [the rate since 2010], there is limited to no evidence to assume that the trajectory... will reverse such that additional land requirements will be positive to 2041... It is also reflective of the trend in the supply of land in Camden and London generally...whereby industrial land is continuing to be lost at a reduced rate most recently (2015-2020) when compared to previously". The Study projected a further small reduction in industrial floorspace over the plan period which will be offset to an extent by the intensification of larger industrial sites.
- 6.18 The main opportunities to provide industrial space are on key employment sites that have been identified as site allocations in the draft Local Plan. Proposals for these sites could deliver additional or quantitatively better space. It is not considered appropriate to seek to prescribe a definitive amount of particular B use classes on individual sites as new and existing businesses have a variety of different needs (and which may differ from the premises they currently occupy) and setting quantum could unnecessarily limit development proposals.

Hatton Garden

- 6.19 The Council has a longstanding approach across iterations of the Local Plan of seeking to protect and sustain Hatton Garden's role as a centre for the jewellery industry. The draft Local Plan aims to preserve this character and ensure that where development proposals come forward, consideration is given to the area's jewellery-related function. The Council's [Affordable Workspace Strategy](#) identifies that rising rents and the loss of jewellery workspace "represent significant threats to the sector". The sector tends to require smaller to medium sized premises which provide cellular spaces of a range of different sizes, sometimes no more than 30sqm in area.
- 6.20 The threshold of 200sqm in Policy S3(C) is based on the relative smaller size of schemes that typically come forward in the Hatton Garden area and is considered to remain appropriate. The Council's Inclusive Economy team are involved in negotiations for new jewellery workspace on relevant schemes.

Their experience has been that significant discounts are required in order to meet user demands and needs. Given the Central London location of Hatton Garden and the potential difficulties for new businesses to establish a foothold in the area, a benchmark of 50% of the average for equivalent jewellery-related uses is proposed. The Council will apply this flexibly seeking to negotiate the greatest discount to market rents that is viable (as set out in paragraph 3.26 of the Plan).

- 6.21 Although the introduction of Class E has made it harder to protect existing jewellery premises, the Council considers that the Local Plan still has a role in promoting jewellery workshops and related uses as the priority land use within this small area. This is consistent with adopted London Plan policy SD4 on the Central Activities Zone that identifies “strategic functions of the CAZ” to include “specialist creative clusters including for example clothing, fashion, jewellery, printing, antiques, musical instruments, art and culture” (paragraph 2.4.4). Hatton Garden is an area where special policy support is justified to prevent “the loss of valued specialist clusters of... particular significance to London’s unique identity, economic function or cultural heritage” (paragraph 2.4.15).

Digital infrastructure

- 6.22 The Council considers that access to high quality broadband is an essential pre-requisite for the letting and successful occupation of commercial floorspace. It is now vital for the functioning of a wide range of sectors and businesses and of different sizes and especially for many of the businesses that wish to invest in Camden, such as the creative industries, science and research organisations and technology companies. It is also important in terms of equity as digital connectivity is vital to the establishment of new and smaller businesses.
- 6.23 The National Planning Policy Framework (NPPF) acknowledges planning’s role in support the delivery of digital infrastructure (paragraph 35, paragraph 86 and paragraph 119). Planning policies and decisions should support to both the renewal and expansion of digital networks and enable the development of high growth sectors. Policy SI 6 of the London Plan (2021) on Digital connectivity infrastructure states that “Development Plan should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access”. It states that development proposals should help to facilitate the roll out of full fibre connections capable of achieving speeds of 1GB/s.
- 6.24 We therefore consider that references to development providing “high-speed reliable digital connectivity” in Policy IE1(12) and paragraph 9.26 are reasonable. The Council has also considered Camden’s future needs for enhancing local networks as part of the [Infrastructure Delivery Plan](#) (EB43).

Digital access is also one of the key challenges identified in [We Make Camden](#) (“Everyone in Camden can access and be part of a digital society”).

Childcare provision

- 6.25 Finding suitable childcare is widely recognised as having a major impact on working parents and their ability to participate in certain occupations. It can be difficult to access and expensive to obtain. The Council is aware of some commercial premises where childcare has been considered as an integral component of how a workspace operates, examples include [co-working spaces](#) and [Goldman Sachs](#) providing a nursery and lactation suites from one of their London bases. Family-friendly provision such as breastfeeding rooms are increasingly becoming a feature of new/refurbished premises and form part of a wider employment ‘package’ promoting flexible ways of working.
- 6.26 The provision of childcare facilities is promoted in the London Plan, which states they should be “safe, accessible for all... and... provided within new housing and/or commercial developments where there is a need” (paragraph 5.3.4). Draft Local Plan policy IE1 encourages developers to address a range of ‘barriers’ to work, “for example the inclusion of on-site childcare” (paragraph 9.25). Provision of childcare facilities is not a policy requirement expected in all schemes but it is something the Council wishes to encourage. It also supports the [We Make Camden](#) ambition for a “strong, sustainable and inclusive” economy where “everyone should have a secure livelihood to support them to live a prosperous life”. Access to childcare is identified as a factor preventing people from finding a keeping a well-paid, stable job, tackling such issues is seen as something that businesses and institutions can help to address.

Town centre classification

- 6.27 The centre designations on the Council’s Policies Map have been in place for a considerable period of time during which retail expenditure and consumer habits have changed greatly, not least the significant shift to online shopping. Therefore, as part of the review of the adopted Local Plan, the Council have reviewed town centre boundaries and classifications to ensure that these are kept up to date. This was also informed by recommendations in the [Camden Retail and Leisure Study Volume A](#) (EB24) The Council’s own regular monitoring of changes in centres (through the [the Camden Retail Survey](#)) also informed the identification of centres which have seen particular change and which were visited by officers in mid 2024.
- 6.28 Areas that have experienced change include Fitzrovia, which is identified as a large ‘Specialist Shopping Area’ (SSA) in the adopted 2017 Local Plan and [Camden Planning Guidance on Town Centres and Retail](#). The representation of food and drink uses has grown significantly while the proportion of retail uses has declined. The area has the lowest proportion of retail outlets of all

the Specialist Shopping Areas. The Retail Study suggested that this SSA *“should be reviewed as we consider the centre lacks the focus of the other specialist areas. The character of the area is also not as homogeneous as that seen elsewhere and it covers an extremely large area”*. This finding was borne out by officer site visit which found that there are discernible clusters of different uses and changes in the character and function of different parts of the SSA. The area’s reliance on its working population also meant that the recovery in footfall to pre-pandemic levels did not begin to occur until Summer 2023, slower than many other major centres (as the footfall data in the Retail Study confirms). Some of the more peripheral areas have become relatively fragmented due to changes of use (likely linked to the impact of permitted development rights but also potentially an over-supply of premises).

- 6.29 The draft Local Plan proposes that Charlotte Street is designated as a ‘Specialist Area’. This is the ‘core’ central spine of Fitzrovia with a long-established role as a destination for food and drink uses including high quality restaurants and characterful pubs. The Council also considers that Warren Street in the north of the area warrants designation a standalone neighbourhood centre. To address the issues around fragmentation, we are proposing to remove areas of frontage where this is most advanced. The changes are shown on the [draft Policies Map](#) (SD10). The Council considers that the remaining Specialist Areas are continuing to perform their role as visitor and tourist-led destinations, each with their own specialist role, with a high proportion of independent and niche businesses.
- 6.30 The Council is also proposing to designate two new CAZ Retail Clusters at King’s Cross Central, namely King’s Boulevard and Coal Drops Yard. These represent the core shopping and leisure areas of the King’s Cross development and both now have an established Londonwide role serving local workers and visitors. While the development of Coal Drops Yard is complete, the commercial premises fronting onto the eastern side of King’s Boulevard are currently being fitted out. In considering the revised ‘hierarchy’, the Council considered whether Covent Garden should also be one of these areas (which would replace its existing Specialist Shopping Area designation). The Council considered that while the proportion of food, drink and entertainment uses is high, the area (formed of Seven Dials and adjoining streets) does continue to function as a destination for niche comparison retailing, particularly ‘flagships’ for fashion brands and independent clothing businesses. While this area has also has a rich mix of uses, including cultural and leisure attractions, the area’s residential character means that proposals for additional food, drink and entertainment uses may be less suitable in some locations. We consider that such proposals for these uses should continue to be assessed on a case-by-case basis. The fact that the proportion of these uses has grown reflects that the area’s existing designation as a ‘Specialist Shopping Area’ has not prevented development and change in the area.
- 6.31 Neighbourhood centres continue to perform a vital role in Camden providing day-to-day services for their surrounding populations. 39 such centres are

identified on the draft Policies Map. Two new centres are proposed at King's Cross Road and Haverstock Hill South (Steele's village), the latter suggested by local community groups. These designations will help ensure that the retail and services function of these areas is maintained where possible.

- 6.32 The Council is also proposing changes to the boundary of Camden Town town centre and several neighbourhood centres. These changes are intended to bring the boundaries up-to-date and acknowledge where development schemes and changes of use have occurred over the last decade.
- 6.33 The Camden Retail and Leisure Study confirmed that no additional capacity is required in the Borough. This recognises that the volume of expenditure made online is likely to continue to grow over the plan period (albeit it is estimated that this will be at a slower rate than in the past). The exception is the Euston area where new comparison and convenience floorspace is included in the emerging Euston Area Plan as part of the future major mixed use redevelopment of the area. Delivery of this space is not expected until towards the end of the Local Plan period.

Other town centre matters

- 6.34 As expenditure has moved online, the number of schemes proposing significant amounts of additional retail floorspace in London have generally decreased. However, several comprehensive developments in Camden have come forward over the last decade within or well-related to existing centres and frontages. Examples include Hawley Wharf in Camden Town and The Post Building at 21 New Oxford Street, both of which have provided some smaller retail units. The King's Cross Central development also provides a wide range of retail and food and drink premises of different sizes. While not necessarily providing 'affordable' space, smaller units by their nature can be lower cost and ensure choice and variety. The provision of small units in Camden an established approach under Policy TC5 of the adopted Local Plan. We have increased the threshold to 2,500sqm (from 1,000sqm) to acknowledge that this may be harder to provide in some medium sized schemes. This is consistent with adopted London Plan policy E9 on Retail, markets and hot food takeaways, which states in part (B) that boroughs plans should "set out policies and site allocations to secure an appropriate mix of shops and other commercial units of different sizes... Particular consideration should be given to the contribution large-scale commercial proposals (containing over 2,500sqm gross A Use Class floorspace) can make to the provision of small shops and other commercial units".
- 6.35 For similar reasons, it is desirable to retain some control in development management over the amalgamation of shop units. Policy IE6(9) states the Council will "resist proposals involving the formation of larger units where this would harm the character or role of a centre". The Council intends to apply this approach flexibly and it is likely to be most relevant to proposals involving centres that are important in accommodating independent and specialist retail

that relies on the availability of smaller premises. We nevertheless recognise that there can be particular circumstances that mean such protection could be a barrier to sustainable development, for example where additional space is needed to meet fire safety regulations or to provide mechanical and electrical services, needed for a building to be successfully refurbished and let. The Council is therefore proposing a modification to paragraph 9.108 to address such circumstances.

Training and apprenticeships

- 6.36 An important benefit of the planning process is in shaping the local economy through securing contributions towards employment and training initiatives. The Council's approach is to seek employment and training packages for all commercial land uses and where the proposal is expected to provide at least 1,000sqm of floorspace or 50 jobs (unless the applicant demonstrates that the total build cost is less than £3 million). What each package contains is subject to negotiation and will depend on the nature and size of the scheme being proposed. The Council will routinely secure construction opportunities for residents and also seek the provision of apprenticeships and training placements in the new development once it is occupied. [Camden Planning Guidance on Employment Sites and Business Premises](#) sets out recruitment targets proportionate to the size of scheme. The Council requires financial contributions where employment floorspace would be lost which can be invested in the Council's employment and training projects.
- 6.37 [Good Work Camden](#) is the Council's flagship employment and business support programme which provides a range of support, advice and signposting for residents looking for work, starting a business or growing a business. This includes a 'Young Talent Guarantee' whereby every 16 to 24 year old in Camden is guaranteed support to access employment opportunities, including work experience, careers guidance and apprenticeships.
- 6.38 The Council may also secure commitments to support wider initiatives aimed at creating a more inclusive economy. Various approaches have been developed to improve outcomes for residents and local businesses. Examples include: [LIFT: Learning Inclusive Futures through Technology](#), a three year programme in Camden and three other London boroughs to address diversity and inclusion in knowledge economy sectors such as health, life sciences, technology and digital creative industries. [The Camden STEAM Programme](#) brings together schools and employers in the science, technology and creative sectors, to raise young people's awareness of STEAM (Science, Technology, Engineering, Arts and Mathematics) sectors and equip them with the skills and opportunities to embark on successful careers. The [Future Camden Fund](#) is a small business grant and loan offer for businesses delivering social impact with businesses that typically struggle to access funding encouraged to apply. Recipients of funding also receive wraparound business support and advice.

Hot food takeaways

- 6.39 Paragraph 96 of the NPPF states that planning policies and decisions should aim “to achieve healthy, inclusive and safe places which enable and support healthy lives”. This includes promoting good health and preventing ill-health. Paragraph 97 specifically refers to hot food takeaways and fast food outlets which should be refused within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre or “in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social behaviour”.
- 6.40 London Plan 2021 policy E9 D states that “Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school, and refers to boroughs setting a locally-determined threshold where this has been justified. In a dense urban area such as Camden with 37 primary schools and ten secondary schools, this means that in practice that proposals for hot food takeaways are not likely to be acceptable in large parts of the borough.
- 6.41 The Council, however, considers that the London Plan approach is necessary and justified based on Camden’s own circumstances, including local evidence prepared by LB Camden Public Health officers and retail survey data showing the numbers of existing hot food takeaways in our centres. [The Camden Annual Public Health Report 2024/25](#) tracks ill-health and potential risk factors at ward level and in the context of wider socio-economic data including the Indices of Deprivation. All areas of Camden have concerning levels of overweight children at both reception and Year 6 and considerable variation across wards, strongly correlating with household poverty. For example, at Year 6 the lowest percentage of overweight children recorded in any ward was 16%, however levels of 47% were recorded in Kilburn and Haverstock and 50% in Camden Town ward. These areas also have high concentrations of hot food takeaways and relatively fewer healthy food options.
- 6.42 Draft Policy IE7 therefore seeks to resist new hot food takeaways where hot food takeaways are clustered or over-concentrated and near to schools or “sensitive uses” such as play areas. In all other cases, proposals for new hot food takeaways would need to be accompanied by a Health Impact Assessment (HIA) that considers the role of healthier menu options. The same approach is to be taken for proposals involving new Delivery-led food businesses as set out in draft Policy IE9.
- 6.43 The [Health Impact Assessment of the draft Camden Local Plan](#) (SD09) notes that hot food takeaways have “a major influence on our behaviours and streets crowded with fast food outlets can influence our food choices... Children, exposed to these outlets, whether out with friends or on their way home from school, may find it more difficult to choose healthier options”. The detailed report [Fast food takeaways and health and wellbeing in Camden](#)

(EB27) prepared by LB Camden's Health and Wellbeing Department demonstrates the scale of the challenge and that addressing weight issues amongst children and young people will require a set of actions of which planning policy is one part. The Study concludes that while "high density, high fat and high sugar food is not the only factor that influences diet and obesity, it is a significant contributing factor which needs to be part of an integrated approach to managing and preventing overweight and obesity".

- 6.44 The Council therefore considers that the approach set out in the Proposed Submission Draft to managing access to hot food takeaways is reasonable and proportionate and is consistent with the objectives of national and London planning policy.

Gambling-related uses

- 6.45 Paragraph 6.9.5 of the London Plan 2021 states that "over-concentrations of some uses...such as betting shops, pawnbrokers, pay-day loan stores, amusement centres and hot food takeaways, can give rise to particular concerns regarding the impact on mental and physical health and wellbeing, amenity, vitality, viability and diversity. The proliferation and concentration of these uses should be carefully managed through Development Plans and planning decisions..." Boroughs can also require applicants to provide Health Impact Assessments for such uses.
- 6.46 LB Camden Public Health Officer's have prepared a report on [Gambling-related harm and vulnerability to harm in Camden](#) (EB28) which provides local evidence of the proliferation and impacts associated with these uses. It is generally accepted that the risk of gambling-related harms increases in places experience high levels of deprivation. The report uses a Gambling Harm Vulnerability Index to describe the relative risk within Camden of being vulnerable to gambling at a small area level. This shows that significant levels of vulnerability to gambling-related harm exist in multiple areas of the borough, with particular concentrations of licensed gambling premises in areas of high deprivation. These areas include the majority of Camden's designated town centres. The report states that "these areas should be priority areas for resisting new gambling premises due to the additional risk arising from over-concentration of gambling premises".
- 6.47 Draft Local Plan policy IE8 therefore seeks to minimise the impacts of these uses on health and wellbeing. The policy also seeks to address the impacts of exposure to promotional material for betting which is often present in shop windows through limiting numbers of additional premises on walking routes to schools. Where new betting shops are being proposed, the Council considers it is legitimate to expect applicants to submit a Health Impact Assessment as this is a way of assessing how potential harms can be minimised and preferably avoided.

7 Conclusion

- 7.1 The approach to securing an inclusive economy in the Proposed Submission Draft Local Plan is based on a thorough understanding of Camden's unique circumstances, the Council's engagement in shaping the employment outcomes for multiple schemes of a wide range of different types and size, and is based on the findings and recommendations of evidence prepared to support the Plan. Through partnership working the Council performs an active role shaping local economic outcomes through its role as planning authority and via its dedicated Inclusive Economy team.
- 7.2 The Plan carries forward key elements of the Council's long-standing approach to the protection of employment sites, e.g. the use of marketing exercises and the protection and support for specialist clusters of uses such as the jewellery industry in the Hatton Garden area. The Council considers that the draft Local Plan's policies are sufficiently flexible, acknowledging the dynamic nature of the local economy, including land and labour markets and the importance of, and need to respond to, rapidly changing circumstances and market signals. The Local Plan's site allocations set out the Council's expectations for how the future development of major sites is to be managed to deliver the intensification of industrial and employment uses, with a range of premises to support the local economy and development of growth sectors.
- 7.3 The introduction of an affordable workspace policy helps to formalise arrangements that already exist whereby the Council seeks an affordable workspace contribution in some larger schemes. The key benefit of this policy is in providing greater certainty of the Council's expectations and making clear the factors that the Council will take into account when determining what affordable workspace an individual scheme should provide. It is also likely to increase delivery of affordable workspace over time. As set out in this paper, the viability impacts of the affordable workspace policy have been tested as part of the viability assessment of the Plan. Use of payments in lieu in some circumstances is likely to allow for better employment outcomes to be achieved by facilitating the right types of space in locations where the need is greatest. The draft Local Plan also recognises that some sectors, such as life sciences and creative industries, have discrete needs and there are other factors, not solely headline rents, which will have a bearing on the take up of space.
- 7.4 The Council believes that the Plan's approach will contribute towards the objective of delivering a more diverse economy, which will maximise opportunities for residents, businesses and the voluntary sector to contribute to and share in the success of Camden's economy by ensuring that a sufficient mix of workspace is delivered and maintained. Plan policies will also continue to help get people into work and develop their careers through harnessing economic development benefits such as training, business support and a wide range of educational and learning opportunities. As demonstrated in this paper, the policies are aligned with the strategic planning

objectives of the London Plan, as well as the Council's own vision for the borough set out in 'We Make Camden'.

- 7.5 The approach for managing development within the borough's network of centres is reasonable and proportionate. The Council has reviewed existing policy designations and is proposing a number of alterations to the Local Plan's Policies Map based on the findings of the Camden Retail and Leisure Study, the Council's own regular surveys of the health of centres and Officer visits to centres to sense check data findings. While centres in Camden are generally healthy in terms of their occupancy, based on changing consumer spending patterns, there is no justification for identifying additional capacity for convenience or comparison floorspace at the current time. Needs over the plan period will therefore be met through the turnover of existing premises. The main exception to this is major development envisaged at Euston, where additional retail floorspace is being identified through the Euston Area Plan.
- 7.6 The Council also considers that the approach of managing centres with regards to their character, role and functions remains relevant and appropriate, building on existing practice. The Council intends to review Camden Planning Guidance on Town Centres and Retail in due course to refresh the detailed descriptions of centres and reflect the impact of changes the Use Classes Order. We also consider that draft Local Plan policy for managing the demand for hotels and visitor accommodation and proposals involving Camden's markets strikes an appropriate balance between supporting the economic benefits of such proposals and ensuring their impact on local amenity is addressed. Limitations the proliferation of some uses are identified where this is considered to be fully justified and evidenced in the interests of local public health concerns, and the approach is compliant with the adopted London Plan.
- 7.7 The Council therefore considers that the approach set out in the Inclusive Economy chapter of the draft Local Plan is reasonable and proportionate. It is positively prepared, justified, consistent with national and Londonwide policy, and is therefore sound.