

Enforcement Delegated Report

Receipt date:

August 2020

Officer

Katrina Lamont

Enforcement Case

EN20/0676

Breach Address

1 & 1A Hurdwick Place
London
NW1 2JE

Photos & Other material

On file.

Authorised Officer Signature



20/10/2022

Alleged Breach

Without planning permission:

1. The change of use from restaurant at basement and ground floor and 4 residential units at the first, second and third floor to use of the basement, part ground floor, first and second floors of the building as 10 residential units.
2. The erection of part single storey part two storey rear extension and single storey extension at lower ground floor level.
3. Installation of balustrade to enable the use of the flat roof of the unauthorised extension at first floor level to create a terrace at second floor level.

Recommendation(s):

That the Head of Legal Services be instructed to issue an Enforcement Notice under Section 172 of the Town & Country Planning Act 1990 as amended requiring the use of the basement, part ground, first, second and third floors as 10 residential units to cease, return the use of the basement to Use Class E and 4 residential units to the first, second and third floors, removal of single storey rear extension to lower ground floor and cease the use of the first floor roof extension as a terrace and removal of balustrade enclosing second floor roof terrace and to pursue any legal action necessary to secure compliance and officers be authorised in the event of non-compliance, to prosecute under section 179 or appropriate power and/or take direct action under 178 in order to secure the cessation of the breach of planning control.

Site Description

The site features a 4 storey end of terrace property which abuts the Grade II listed Mornington Crescent Underground Station. The property has the appearance of two terrace units as shown in the photograph below.

There is currently a vacant Restaurant at ground floor level (Use Class E) which is cordoned off with hoarding and has not been developed. The lower ground floor and upper floor levels consist of 10 flats. The site features a two storey infill to the front of the property as shown in the image below. It also features lower ground floor extension and second floor extensions to the rear.

The site is not statutorily or locally listed however as noted above it abuts the Grade II Mornington Crescent Underground station. It is sited within the Camden Town Conservation Area and the terrace as a whole is considered to make a positive contribution to the Conservation area.



Image 1. Site photograph showing front elevation of 1 Hurdwick Place

Investigation History

An enforcement investigation was opened in August 2020 following a referral from the Councils Environmental Health Officers who visited the property and raised concerns regarding the substandard accommodation, fire safety concerns and number of flats they viewed.

A meeting was held with the Offenders agent in November 2020 to discuss a way forward. Plans were provided to the Council that showed how the property could be converted into 8 flats and how the extensions did not cause harm in the opinion of the agent.

An application was submitted to the Council in June 2021. This was later withdrawn by the agent November 2021 as Officers advised the application was likely to be refused due to the substandard accommodation and poor outlook and daylight suffered by occupiers in some of the flats and lack of car free agreement.

A site inspection was carried out on August 2022 with Enforcement Officers, Environmental Health Officers, agent and the letting agent. Access was gained to several of the flats. Officers found them to be mostly substandard in size, suffering lack of outlook and daylight.

Relevant policies / GPDO Category

National Planning Policy Framework 2021

London Plan 2021

Camden Local Plan 2017

A1 Managing the impact of development
A4 Noise and vibration
D1 Design
D2 Heritage
H1 Maximising Housing Supply
H2 Maximising the supply of self-contained housing from mixed-use schemes
H3 Protecting existing homes
H4 Maximising the supply of affordable housing
H5 Protecting and improving affordable housing
H6 Housing choice and mix
H7 Large and small homes
H8 Housing of older people, homeless people and vulnerable people
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development

Camden Supplementary Planning Guidance

CPG Design 2021 Chapters 1 (Introduction), 2 (Design Excellence), 3 (Heritage), CPG Amenity and CPG Transport

Camden Town Conservation Area Appraisal and Management Strategy (CAAMS)

Assessment

Relevant Planning History:

2022/5518/NEW - This Planning Application seeks to retain the existing C3 Residential use. There are proposed alterations to the existing 10 units, to create 9 units, as per the previously granted application. These changes are to the internal layout located on all floor plans. The proposal seeks to reinstate a rear window on the Ground Floor and create a window to the Basement Floor – **Not yet registered**

2021/3053/P - Retention of ground floor restaurant and use of basement, first, second and third floors as 8 flats. Replacement of existing windows at rear on first floor with obscure glass Oriel windows – **Withdrawn, 10/11/2021**

2019/6251/P - Internal and external alterations associated with the conversion of ground floor 2Bed self-contained flat into 1x studio and 1 x 1Bed self-contained flats – **Withdrawn, 19/05/2020**

2018/0007/P - Details of waste storage pursuant to condition 4 of planning permission 2015/1630/P dated 18/09/2015 (for the erection of an infill side extension at second and third floor level and a rear part single part double storey rear extension between first and second floor level to provide 2 x studio flats, 1x 3bed self-contained flat and 1 x 2bedroom residential flats) – **Granted, 18/09/2019**

2017/6516/P - Details of cycle storage required by condition 5 of planning permission dated 18/09/2015 ref 2015/1630/P for 'Erection of an infill side extension at second and third floor level and a rear part single part double storey rear extension between first and second floor level to provide 2 studio flats, 1 x 3bed self-contained flat and 1 x 2bedroom residential flats – **Granted, 15/01/2018**

2016/1334/P - The conversion of the existing 3Bed self-contained flat into 2 x 1Bed self-contained units at basement level, associated with planning permission 2015/1630/P granted on 18/09/2015 for: Erection of an infill side extension at second and third floor level and a rear part single part double storey rear extension between first and second floor level to provide 2 x studio flats, 1x 3bed self-contained flat and 1 x 2bedroom residential flats –

Granted subject to S106 Agreement, 02/06/2016

2015/1630/P - Erection of an infill side extension at second and third floor level and a rear part single part double storey rear extension between first and second floor level to provide 2 x studio flats, 1x 3bed self-contained flat and 1 x 2bedroom residential flats –

Granted subject to S106 Agreement, 18/09/2015

2013/0035/P - Erection of infill side extension at second and third floor level, rear extension at first floor level and installation of external walkway to rear at second floor level in connection with existing 2 x-2 bedroom flats and the creation of an additional 2-bedroom flat (Class C3) –

Refused, 26/03/2013

1.0 Assessment

The material considerations in assessing the unauthorised development is:

- Unit Mix
- Quality of Accommodation
- Transport Considerations
- Impact of extensions on character and appearance of host property, adjoining Grade II listed building and wider Camden Town Conservation Area.
- Neighbouring Amenity

2.0 Background

- 2.1 The site, the subject of this notice, occupies an end of terrace position next to the Grade II listed Mornington Crescent Underground station. The building has the appearance of two terrace houses. The ground floor is currently vacant but had been a restaurant. The lower ground floor, first, second and third floors contain residential units. The three main issues are the unauthorised flats and extensions to the building and second floor roof terrace.
- 2.2 The site has extensive planning history. Planning permission (Ref: 2015/1630/P – *‘the 2015 permission’*) was granted on 18/09/2015 for - *Erection of an infill side extension at second and third floor level and a rear part single part double storey rear extension between first and second floor level to provide 2 x studio flats, 1x 3bed self-contained flat and 1 x 2bedroom residential flats.*
- 2.3 A further application (Ref: 2016/1334/P – *‘the 2016 permission’*) was granted on 02/06/2016 for *The conversion of the existing 3Bed self-contained flat into 2 x 1Bed self-contained units at basement level, associated with planning permission 2015/1630/P granted on 18/09/2015 for: Erection of an infill side extension at second and third floor level and a rear part single part double storey rear extension between first and second floor level to provide 2 x studio flats, 1x 3bed self-contained flat and 1 x 2bedroom residential flats*
- 2.4 It should be noted, that both these applications contained inaccurate existing drawings which showed there to be only 2 residential units in the building. The plans showed there to be 1 x 2 bed on the first floor and 1 x 2 bed maisonette on the second and third floors. Following discussions with the agent and a review of the council tax records for the site, the Council accepts there were 4 flats in the building (See Appendix A – Pre-existing floor plans). Updated pre-existing plans provided by the agent show there to be 1 x 1 bed and 1 x 2 bed on the first floor, 1 x 2 bed on the second floor and 1 x 2 bed on the third floor as shown by the table below.

Floor	Number of bedrooms	Approx GIA (sqm)
First floor	1 x 2 bed	39.8
First floor	1 x 1 bed	37.6
Second floor	1 x 2 bed	39.1
Third floor	1 x 2 bed	40.9

Table 1. GIA(sqm) for pre-existing flats

- 2.5 The as built development contains 10 flats in total as shown in the table below, the ground floor is currently vacant. The description of the 2016 permission implies an existing 3 bedroom flat would be subdivided – it should be noted, this is not referring to a flat that existed at that time but the 3 bedroom flat shown on the 2015 plans which had not been implemented at that time. The permissions outlined would have involved the creation of 9 flats in total.

Floor	Number of bedrooms	Approx GIA (sqm)
Basement (Flat 8) Door to flat on ground floor	1 x 2 bed	49.1
Basement (Flat 9)	1 x 1 bed	42.3
Basement (Flat 10)	1 x 2 bed	37.7
First floor (Flat 1) Pre-existing	1 x 2 bed	46.9
First floor (Flat 2)	1 x 2 bed	40.6
First floor (Flat 3)	1 x 1 bed	27.4
Second floor (Flat 4)	1 x 2 bed	45.5
Second floor (Flat 5)	1 x 2 bed	33
Third floor (Flat 6)	1 x 2 bed	46
Third floor (Flat 7)	1 x 2 bed	32.4

Table 2. GIA(sqm) of as built flats

- 2.6 It is the Council's understanding, the flats in question have been occupied since August 2020 as confirmed by a site inspection carried out by Environmental Health Officers prior to reporting the breach to Planning Enforcement. Council tax records show council tax payments began September/October 2020 for each flat.
- 2.7 With regards the physical alterations to the building, the two story infill extension to the side of the building has been implemented. This aspect appears to be in line with the 2015 and 2016 permissions. However the extensions to the rear and lower ground floor differ to the approved plans. As built plans provided by the agent show a lower ground floor extension and that the first floor extension spans the width of the building and the second floor element was not implemented. In addition there is an unauthorised second floor roof terrace. The impact of these will be considered in detail in section 6.0.

3.0 Unit Mix

- 3.1 Local Plan policy H7 (Large and Small Homes) is aimed at maintaining a range of dwelling types and sizes that will contribute to the creation of mixed, inclusive and sustainable communities. This policy applies wherever there is development that affects the mix of dwelling sizes, as is the case in this instance.
- 3.2 This unauthorised development is a mix of 2 x 1 bed flat and 8 x 2 bed flats. The Camden Strategic Housing Market Assessment (SHMA) as having the greatest requirement for two and three bed flats and a lower priority for 1 bed flats. Table 1 below demonstrates this:

Table 1: Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

- 3.3 While the development has resulted in 8 high priority flats it does not outweigh the substandard quality of accommodation created and the inevitable harm this has on current and future occupiers.

4.0 Quality of Accommodation

- 4.1 The agent has contended that the 4 pre-existing flats have been retained within the unauthorised development. However only 1 flat appears to be laid out as pre-existing, flat 1 on the first floor. Flat 2 has been altered and extended to create 2 flats and therefore is not accepted as a retained flat. Similarly on the second floor, the pre-existing flat, has been altered and extended to create 2 flats and is not considered a retained flat. On the third floor, the pre-existing flat has been altered and extended to create 2 flats. Overall there is only one retained flat. As such, all new flats are expected to meet the nationally described technical space standards. A comparison of the plans is attached at Appendix B.
- 4.2 The nationally described technical housing standards sets out minimum gross internal floor areas as illustrated in the table below.

Table 1. Minimum gross internal floor areas and storage (m²)

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
1b	2p	50	58		1.5
2b	3p	61	70		2.0
2b	4p	70	79		2.0

4.3 The following table shows the GIA for each flat.

Floor	Number of bedrooms	Approx GIA (sqm)
Basement (Flat 8) Door to flat on ground floor	1 x 2 bed	49.1
Basement (Flat 9)	1 x 1 bed	42.3
Basement (Flat 10)	1 x 2 bed	37.7
First floor (Flat 1) Pre-existing	1 x 2 bed	46.9
First floor (Flat 2)	1 x 2 bed	40.6
First floor (Flat 3)	1 x 1 bed	27.4
Second floor (Flat 4)	1 x 2 bed	45.5
Second floor (Flat 5)	1 x 2 bed	33
Third floor (Flat 6)	1 x 2 bed	46
Third floor (Flat 7)	1 x 2 bed	32.4

4.4 The table demonstrates that every flat except 1 is grossly undersized.

4.5 Basement flats

4.6 Flat 9 is served by only one small window to the bedroom, the main living space is dark and artificial light is required day and night. Flat 10 has one window to the front that serves a bedroom and one tiny window to the rear bedroom which overlooks a wall at close proximity, similar to Flat 9, it likely requires artificial light day and night. Flat 8 is accessed from the ground floor, stairs descend into the living room. Bedroom 1 is accessed via the kitchen. The kitchen window and window to bedroom 1 overlook one another at close proximity. Bedroom 2 overlooks a small lightwell with a wall in close proximity. Officers witnessed very little daylight reaching these lightwells even on a sunny day. The basement flats are cramped and dark and suffer from a serious lack of access to natural daylight, ventilation and outlook to the detriment of current and future occupiers. In addition inner rooms create a serious fire safety risk to occupiers.

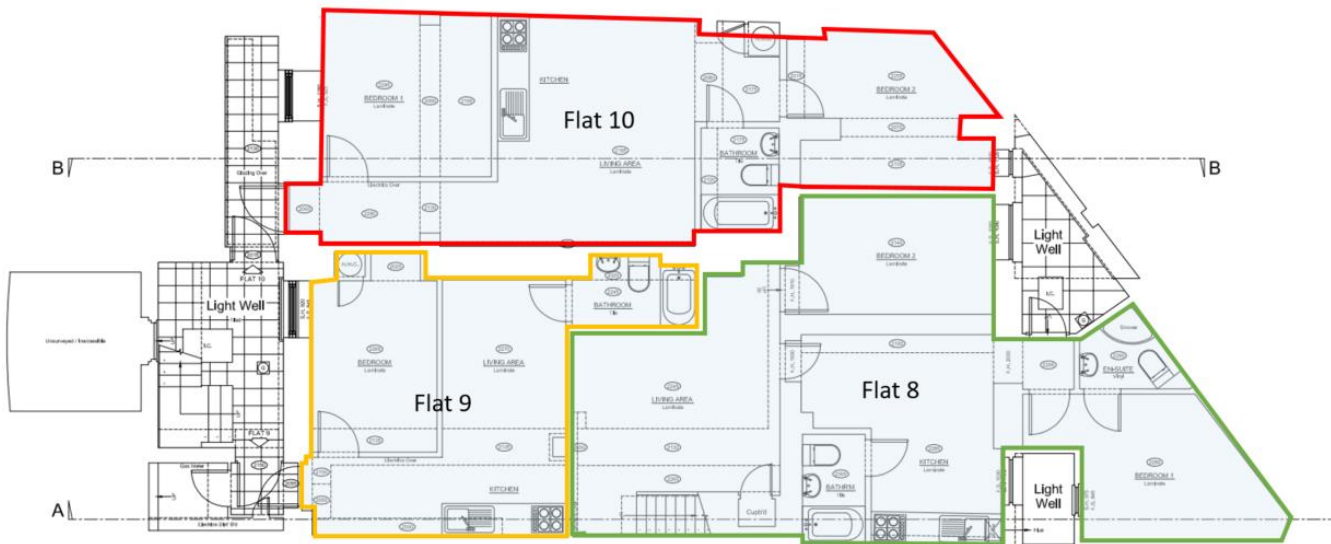


Image 2. Basement floor plan showing Flats 8, 9 and 10

4.7 First floor flats

4.8 The first floor contains 3 flats. Flat 1 is the only flat which appears to be pre-existing and laid out as per pre-existing floor plans. Though it is undersized for a 2 bedroom flat at approximately 46.9 sqm, it is considered lawful by virtue of the passage of time. It is served well by 4 windows to the front of the property and therefore has access to adequate daylight, ventilation and outlook. Flat 2's main kitchen/living space has no windows. It has a tiny bathroom accessed off the kitchen/living space, it is not possible to close the door when using the toilet as the space is so constrained. The two bedrooms have windows which overlook the rear of the site and appear to have good access to daylight, ventilation and outlook however these benefits do not serve the main living space which is dark and cramped. Flat 3 is significantly undersized at approximately 27.4 sqm resulting in cramped living conditions for current and future occupiers.

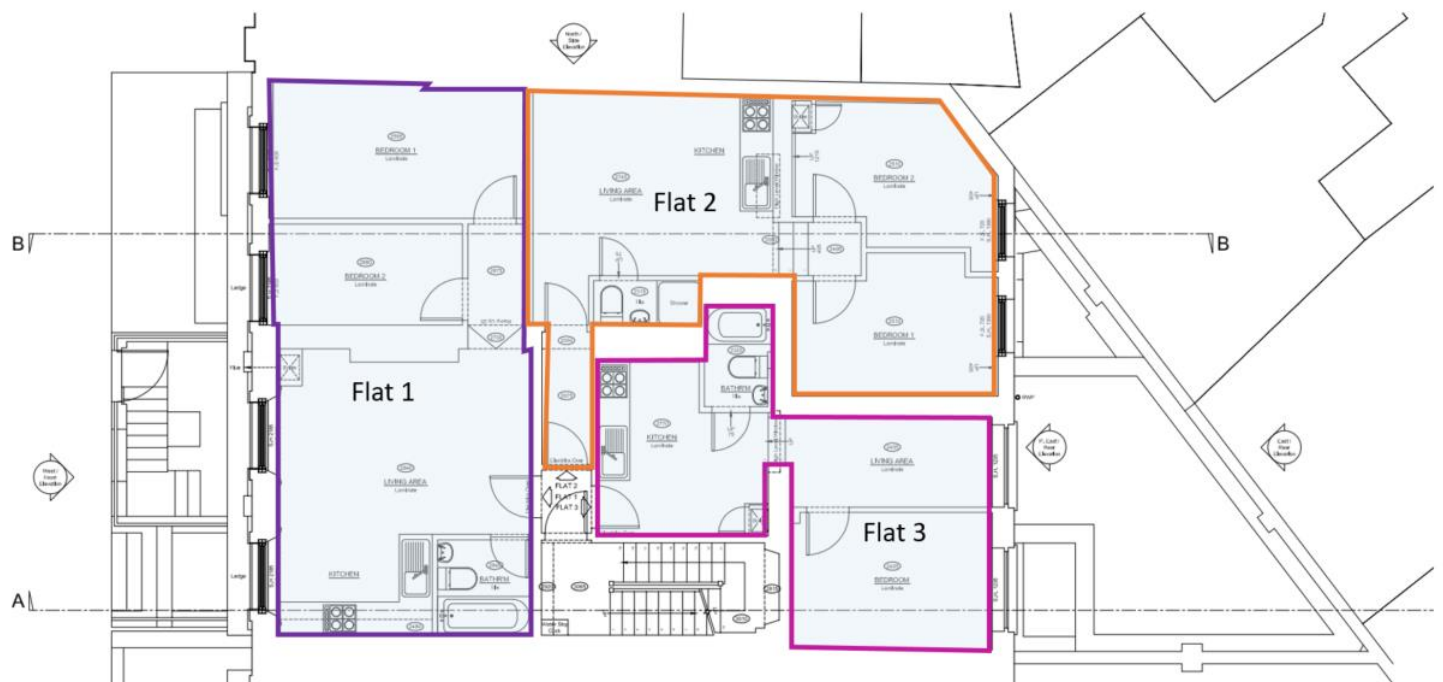


Image 3. First floor plan showing Flats 1,2 and 3

4.9 Second floor

- 4.10 The second floor contains 2 flats. Flats 4 and 5 have access to adequate daylight, outlook and ventilation with flat 4 having 4 windows to the front of the property and flat 5 having 3 windows facing the rear of the property. However the flats are significantly undersized resulting in cramped living conditions for current and future occupiers.
- 4.11 The floor plan below shows there to be a roof terrace to the rear of the site. However, the agency which attended the site inspection in August 2022 stated tenants do not have access to the terrace and it is not in use. In any case, this element of the development is unauthorised and has implications for neighbouring occupiers through overlooking should the terrace be used. If the terrace were acceptable, it is not considered enough to alleviate serious concerns regarding the substandard quality of accommodation.

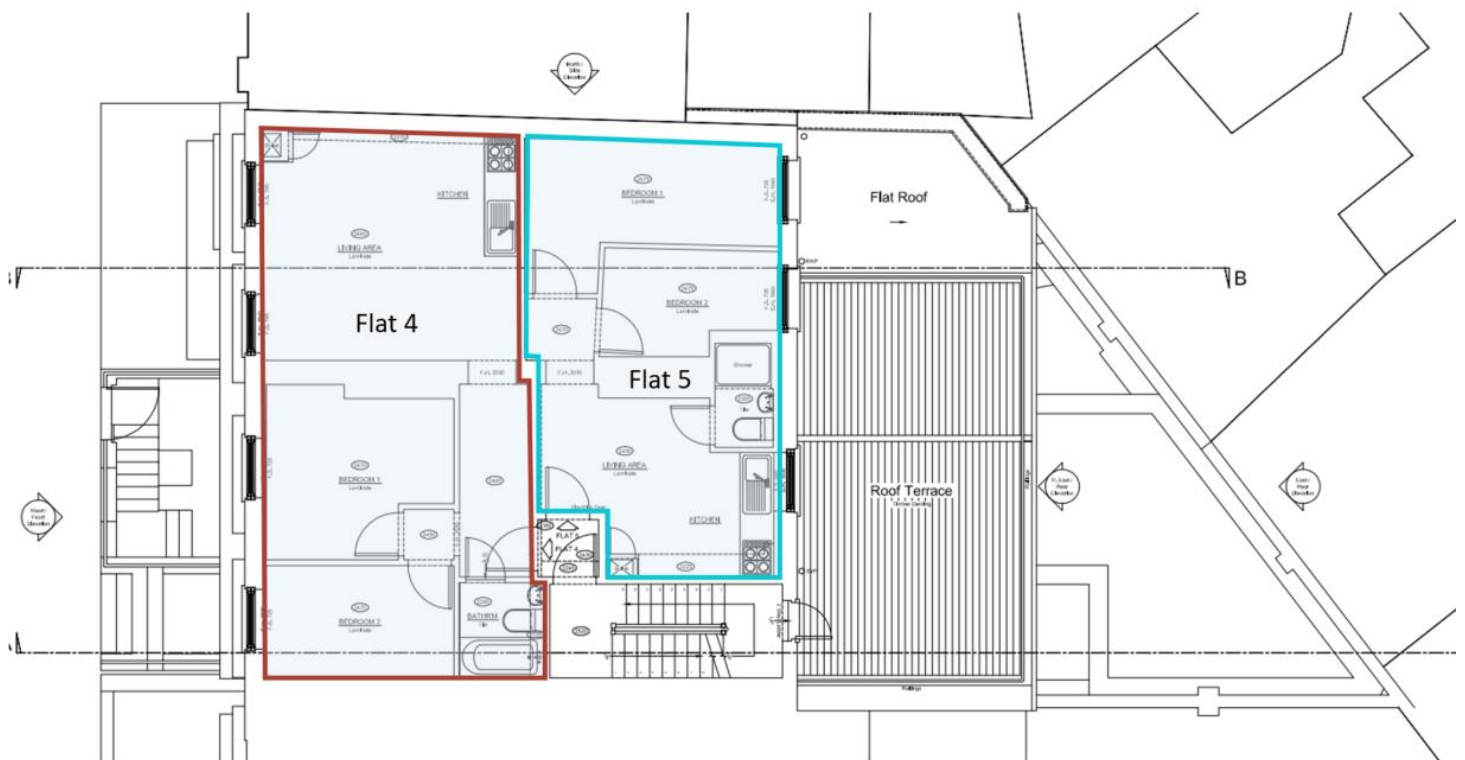


Image 4. Second floor plan showing Flats 4 and 5

4.12 Third floor

- 4.13 The third floor contains 2 flats. Flats 6 and 7 have access to adequate daylight, outlook and ventilation with flat 6 having 4 windows to the front of the property and flat 7 having 3 windows facing the rear of the property. However the flats are significantly undersized resulting in cramped living conditions for current and future occupiers. Flat 7's bathroom is accessed from the main living area next to the kitchen and is tiny.

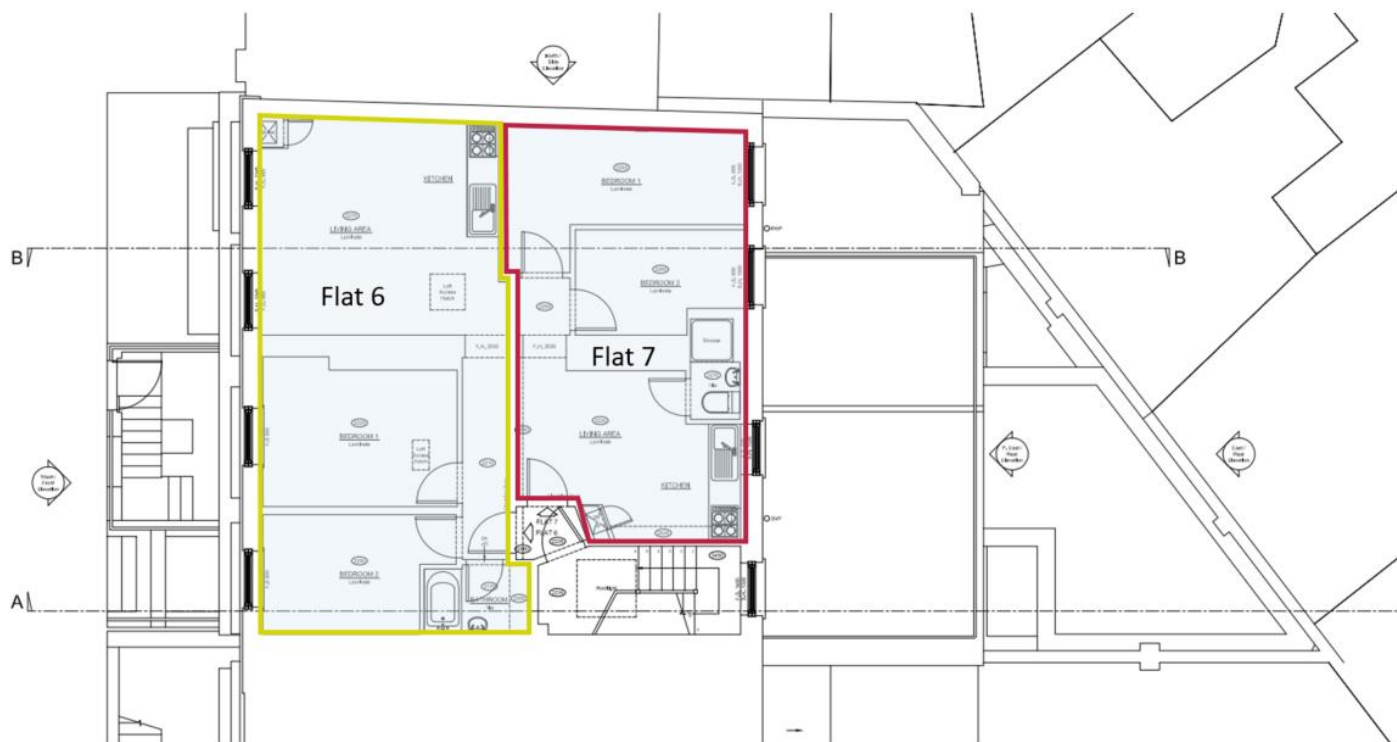


Image 5. Third floor plan showing Flats 6 and 7

- 4.14 In conclusion, the unauthorised flats that have been created provide a substandard quality of accommodation by reason of their small size and cramped layouts to the detriment of residential amenity. While some flats may have better access to daylight, outlook and ventilation, the flats overall are mostly cramped and dark. The development is therefore contrary to policy H6 of the Local Plan 2017.

5.0 Transport considerations

- 5.1 Policy T1 of the Camden Local Plan requires development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan and the design requirements outlined in the Transport CPG. The London Plan requires a minimum of 1 long stay space per 1 bedroom/studio unit. The development does not appear to provide any cycle parking/storage for occupiers.
- 5.2 Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. This includes limiting the availability of both off-street and on-street parking. In absence of a S106 legal agreement to secure the development as car free, the development contributes unacceptably to parking stress and congestion in the surrounding area, contrary to policies T1 (Prioritising walking, cycling and public transport), T2 (Parking and Car Parking), A1 (Managing the impact of development) and DM1 (Delivery and monitoring) of the Camden Local Plan (2017).

6.0 Impact of extensions on character and appearance of host property, adjoining Grade II listed building and wider Camden Town Conservation Area.

- 6.1 The approved physical alterations to the building included the erection of an infill side extension at second and third floor levels and a rear part single part double storey rear extension between first and second floor level.
- 6.2 The two story infill extension to the side of the building has been implemented as shown below. This aspect appears to be in line with the 2015 and 2016 permissions. However the extensions to the rear and lower ground floor differ to the approved plans. As built plans provided by the agent show a lower ground floor extension and that the first floor extension spans the width of

the building and the second floor element was not implemented. In addition there is an unauthorised second floor roof terrace.



Image 6. Approved front elevation as part of 2015/1630/P. No changes to this elevation were proposed as part of application 2016/1334/P.



Image 7. As built front elevation



Image 8. Approved rear elevation as part of 2015/1630/P. No changes to this elevation were proposed as part of application 2016/1334/P.

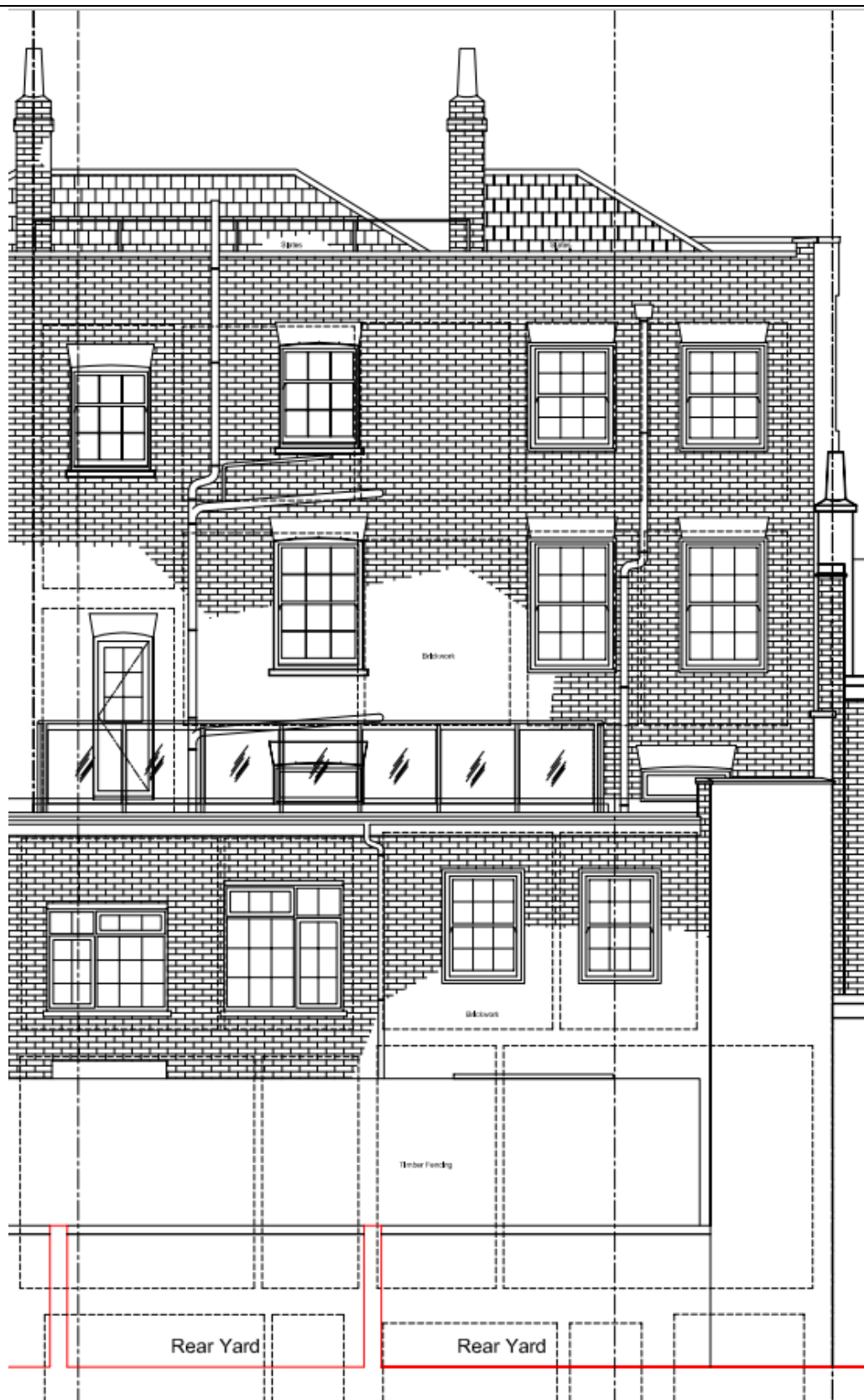


Image 9. As built rear elevation. It was not possible to view this on site due to the constrained nature of the rear of the building.

- 6.3 The as built rear extensions (excluding the single storey extension to the basement level) result in a tidier rear elevation to the original approval and is more sympathetic to the character and appearance of the host property and Grade II Mornington Crescent Station. The second floor roof terrace is unacceptable and will be assessed further within the impacts to neighbouring amenity section.
- 6.4 The most effective way to illustrate the extension to the lower ground floor is to refer to the floor plans below as this is obscured in the elevation drawings.

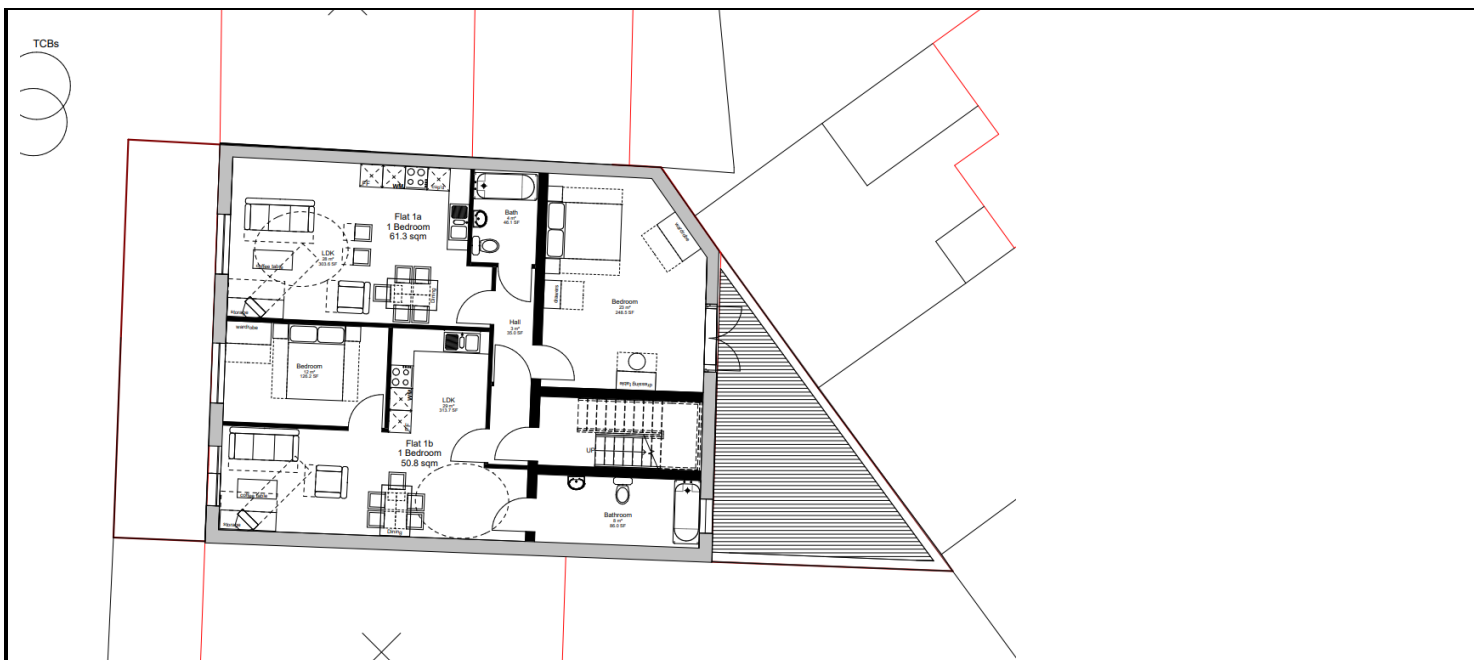


Image 10. Lower ground floor basement plan as approved under 2016/1334/P

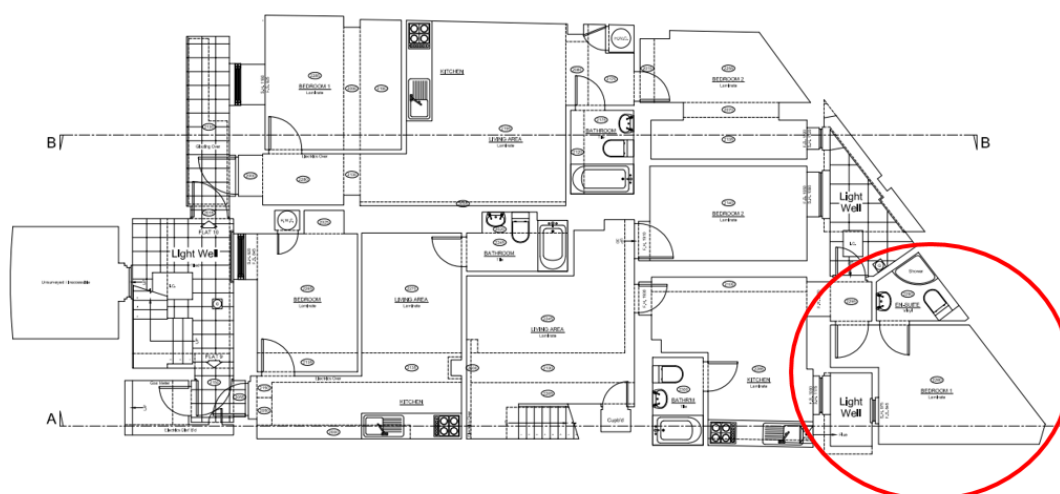


Image 11. As built lower ground floor basement plan

- 6.5 The floor plan above shows the pre-existing lightwell has been extended into with a single storey extension to create a bedroom and bathroom resulting in two significantly smaller lightwells. When the basement flats were originally approved under the 2015 and 2016 permissions this was on the basis the flats would have an appropriate standard of accommodation with outlook and access to natural light and ventilation. While the single storey extension to the basement level is obscured from view and therefore has limited impact on the character and appearance of the host dwelling and Grade II listed Mornington Crescent Station, it is considered to have serious impacts to the quality of accommodation created for occupiers.
- 6.6 The unauthorised second floor roof terrace and balustrade given its siting and size is considered an incongruous addition to the property which detracts from its character and appearance and that of the wider conservation area.

7.0 Neighbouring Amenity

- 7.1 Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. Policy A1 seeks to ensure that development protects the quality of life of occupiers and neighbours by stating that the Council will only grant permission for development that would not harm the amenity of neighbouring residents. This includes privacy, noise, overlooking, outlook and implications on daylight and sunlight.
- 7.2 The extensions to the rear are not considered to negatively impact upon neighbouring amenity through loss of outlook and daylight/sunlight. However the second floor roof terrace is considered to have negative implications for neighbouring occupiers via overlooking and loss of privacy. It would not be possible to overcome these concerns with a privacy screen without creating unacceptable bulk and clutter to the building. As such this element is considered unacceptable.

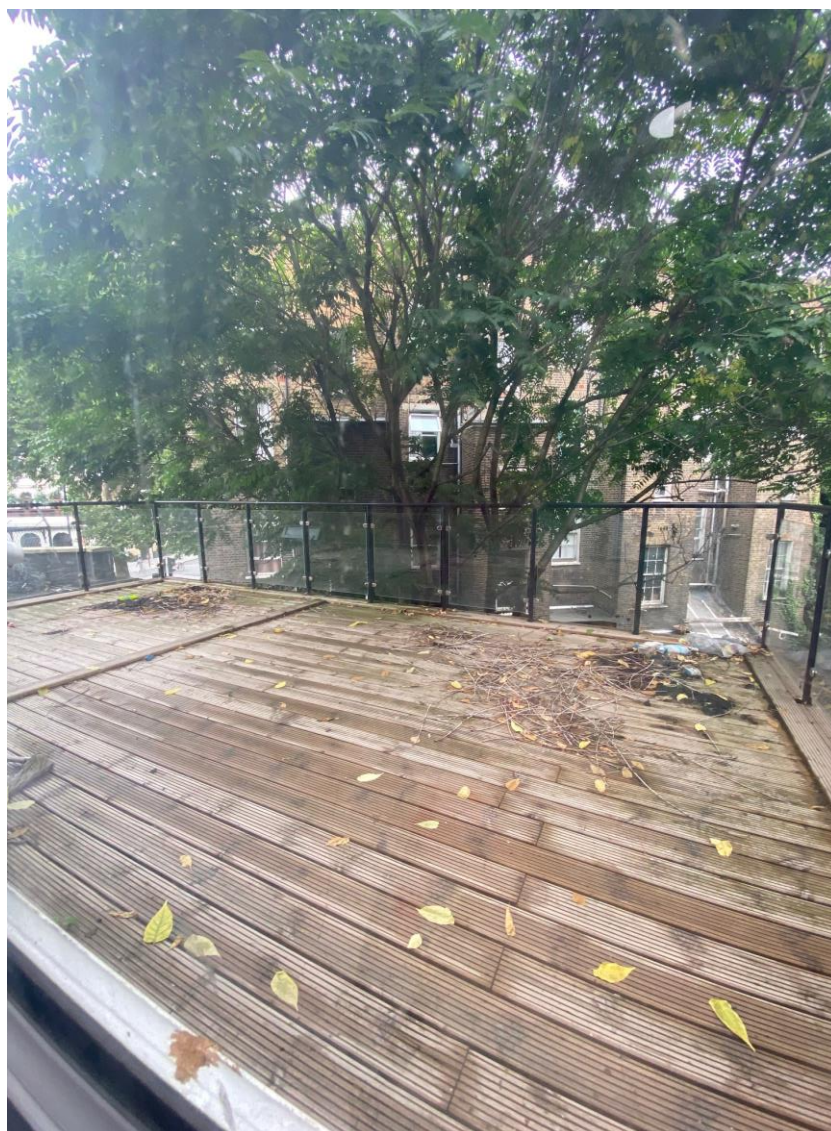


Image 12. Site photograph showing roof terrace to second floor

8.0 Conclusion

- 8.1 The unauthorised flats provide a substandard quality of accommodation by reason of their significantly small size and cramped layouts to the detriment of residential amenity. While some flats may have better access to daylight, outlook and ventilation, the flats overall are mostly cramped and dark. The development is therefore contrary to policy H7 (Large and Small Homes) of the Camden Local Plan 2017.
- 8.2 The unauthorised single storey rear extension to the lower ground floor, by reason of its siting and size, negatively impacts the quality of accommodation for occupiers in the basement flats

by significantly reducing the size of the lightwell which hinders access to outlook, daylight and ventilation and further compounds the cramped nature of the flats. The development is therefore contrary to policy H7 (Large and Small Homes) of the Camden Local Plan 2017.

- 8.3 The unauthorised second floor terrace and balustrade, by reason of its design, siting, size and proximity to habitable windows, detracts from the character and appearance of the host property and wider conservation area and negatively impacts neighbouring occupiers through overlooking and loss of privacy contrary to policy A1 (Managing the impact of development) of the Camden Local Plan 2017.
- 8.4 In absence of a S106 legal agreement to secure the development as car free, the development contributes unacceptably to parking stress and congestion in the surrounding area, contrary to policies T1 (Prioritising walking, cycling and public transport), T2 (Parking and Car Parking), A1 (Managing the impact of development) and DM1 (Delivery and monitoring) of the Camden Local Plan (2017).

Recommendation:

That the Head of Legal Services be instructed to issue an Enforcement Notice under Section 172 of the Town & Country Planning Act 1990 as amended requiring the use of the basement, part ground, first, second and third floors as 10 residential units to cease, return the use of the basement to Use Class E and 4 residential units to the first, second and third floors, removal of single storey rear extension to lower ground floor and cease the use of the first floor roof extension as a terrace and removal of balustrade enclosing second floor roof terrace and to pursue any legal action necessary to secure compliance and officers be authorised in the event of non-compliance, to prosecute under section 179 or appropriate power and/or take direct action under 178 in order to secure the cessation of the breach of planning control.

The notice shall allege the following breaches of planning control:

Without planning permission:

1. The change of use from restaurant at basement and ground floor and 4 residential units at the first, second and third floor to use of the basement, part ground floor, first, second and third floors of the building as 10 residential units.
2. The erection of part single storey part two storey rear extension and single storey extension at lower ground floor level.
3. Installation of balustrade to enable the use of the flat roof of the unauthorised extension at first floor level to create a terrace at second floor level.

WHAT ARE YOU REQUIRED TO DO:

1. **Cease the use of the basement, part ground, first, second and third floors as 10 residential units;**
2. **Return the use of the basement to Class E use and use of the first, second and third floor as four flats as shown on the plans attached at Appendix A;**
3. **Demolish the single storey rear extension at lower ground floor, make good the rear elevation and remove all associated debris from site;**
4. **Cease the use of the first floor roof as a terrace;**
5. **Remove the balustrade to the roof of the first floor extension, remove all associated debris from site and make good on any damage caused.**

PERIOD OF COMPLIANCE: 6 months

REASONS WHY THE COUNCIL CONSIDER IT EXPEDIENT TO ISSUE THE NOTICE:

- a) The breaches outlined above have taken place within the last 4 years;
- b) The resulting accommodation is of a substandard quality by reasons of the poor size and layout, in some cases resulting in limited access to natural light and poor outlook to the detriment of residential occupiers contrary to policy H6 (Housing Choice and Mix).
- c) The unauthorised single storey rear extension at lower ground floor level occupying the majority of the rear lightwell, results in substandard quality of accommodation at basement level, in terms of outlook and natural daylight contrary to policy H6 (Housing Choice and Mix) of the Camden Local Plan 2017;
- d) The unauthorised single storey rear extension at lower ground floor level occupying the majority of the rear lightwell, results in substandard quality at basement level, in terms of outlook and natural daylight contrary to policy H6 (Housing Choice and Mix) of the Camden Local Plan 2017;
- e) The use of the roof of the unauthorised first floor extension as a terrace enabled by the installation of a balustrade, by reason of its design, siting, size and proximity to habitable windows, detracts from the character and appearance of the host property and wider conservation area and harms the amenity of neighbouring occupiers through overlooking and loss of privacy contrary to policies D1 (Design) and A1 (Managing the impact of development) of the Camden Local Plan 2017; and
- f) In absence of a S106 legal agreement to secure the development as car free, the development contributes unacceptably to parking stress and congestion in the surrounding area, contrary to policies T1 (Prioritising walking, cycling and public transport), T2 (Parking and Car Parking), A1 (Managing the impact of development) and DM1 (Delivery and monitoring) of the Camden Local Plan (2017).