

Enforcement Delegated Report	Receipt date:	
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Officer	Enforcement Case
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Ramesh Depala	EN23/0394
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Breach Address	Photos & Other material
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267 Eversholt Street, London, NW1 1BA (comprising units formerly known as Flat 1, 2 and 3, and commercial unit on ground and basement floor at 267 Eversholt Street, London, NW1 1BA)	See below
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Authorised Officer Signature

 30.01.24

Alleged Breach

Material change of use of the building from mixed use consisting of 3 flats (Use Class C3 residential use) and 1 commercial unit (Class E) unit to 15 units of temporary sleeping accommodation (Use Class C1 Hotels) on the ground, first, second, third, fourth and fifth floors, with ancillary concierge/office space on the ground floor.

Recommendation(s):	Issue an Enforcement Notice
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Site Description

The subject property (“the Property”, referred to by the addresses above) is situated at the northern end of Eversholt Street. Originally, the Property consisted of a commercial unit on the ground floor and basement, which were operated as a shop in (what is now) Use Class E, with three flats in residential Use Class C3 situated above the shop over floors one to five. Subsequently the Property was converted into 15 units designed for temporary sleeping accommodation (Use Class C1 Hotels) on all floors with ancillary concierge/office space on the front half of the ground floor.

The street is primarily characterised by commercial units at street level with residential flats above.

The Property is not listed however it is located within the Camden Town conservation area.

Investigation History

The Property came to the Council’s attention when the Council received two certificate of lawful use (existing) (CLEUD) applications to the Council. Application referenced 2023/2027/P is seeking Council’s confirmation that 10 self-contained flats have lawfully been in residential C3 use for the last 4 years and therefore no enforcement action can be taken in respect of them. Application referenced 2022/5295/P is seeking Council’s confirmation that 5 self-contained flats have been in lawful residential C3 use for the last 4 years and that no enforcement action can be taken in respect of them. The CLEUD applications have not been determined by the Council and the applicant has submitted appeals for non determination in respect of both CLUED applications.

The Council undertook the following site visits.

Site Visit on 11th May 2022: On the initial visit on 11th May 2022, access to the Property was denied. Information from neighbours indicated frequent comings and goings of individuals carrying suitcases. Notably, there were no visible letterboxes or doorbells at the property.

Joint Site Visit on 16th May 2022: A scheduled joint site visit with colleagues was conducted on 16th May 2022 across the whole site.

Findings:

1. Shop Frontage (Ground Floor):

- one office desk, one member of staff manning the floor
- Foldable Baby Cot in the cupboard
- Drier and Washing machine in the store room
- Remnants of hotel paraphernalia in the store room which included linen bags, pillows, cleaning chemicals and equipment.,

2. The neighbour occupying the adjacent shop had observed guests arriving and leaving with suitcases on a day to day basis

3. Unit 1 (Ground Floor – Rear of the Shop):

- Access was from the basement. Doors from the shop to the unit appear to have been boarded up.
- White towels, minimal personal possessions.
- Hotel-like setup with no significant personal items.
- Separate fuse box, bathroom, shower, and kitchen.
- Klimt Painting on the wall

4. Unit 2 (First Floor):

- White towels, minimal personal possessions.
- Hotel-like setup with no significant personal items.
- Separate fuse box, bathroom, shower, and kitchen.
- Balloons over Paris (Ikea Poster on the wall)

5. Unit 3:(First Floor)

- Limited personal possessions as above
- Balloons over Paris (Ikea Poster on the wall)

6. Unit 4: (Second Floor)

- Slightly more personal possessions.
- Similar amenities as other flats.
- Balloons over Paris (Ikea Poster on the wall)

7. Unit 5: (Second Floor)

- Similar to Flat 3, with white hotel-style towels.
- Uniform iron and ironing board setup.
- Urban/air balloon photo on the wall.
- Balloons over Paris (Ikea Poster on the wall)

8. Unit 6: (Third Floor)

- Very limited personal possessions, few t-shirts and a jacket.
- Consistent setup with other flats.
- Balloons over Paris (Ikea Poster on the wall)

9. Other Units (Units 7-15 (except Unit 12))

- All follow a similar pattern to what has been described above except for Unit 12
- Each unit from (2 to 11) either had a Klimt Poster and/or Balloons over Paris (Ikea Poster) on the wall.
- Unit 7 (Third Floor), Unit 8 (Fourth Floor), Unit 9 (Fourth Floor), Unit 10 (Fifth Floor), Unit 11 (Fifth Floor)

10. Unit 12: (Ground Floor – opposite unit 1)

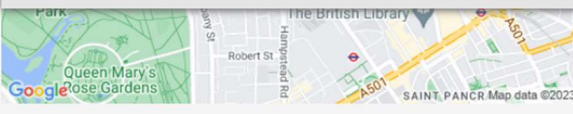
- Accessed from the basement
- During the site visit, the property had more personal possessions than the other units had. Food was stocked up, cleaning detergents under the sink, fridge magnets on the fridge, etc.
- However, since visiting the property it has been found that 15 units have been advertised for STL use on lastminute.com's (austrailia) website, which included Unit 12.

<https://www.lastminute.com.au/London-Hotels-Smj-Groups-267-Eversholt-Street.h21097974.Hotel-Information>

- Accordingly, whilst the Council's officers have previously considered that this unit may fall within Class C3, it is now considered that the use is within Class C1, consistently with the other units described above.

https://www.lastminute.com.au/London-Hotels-Smj-Groups-267-Eversholt-Street.h21097974.Hotel-Information

Photos · Rooms · Amenities · Reviews · Policies



Smj Groups 267 Eversholt Street
Eversholt Street 267, London, ENG NW1

About the Hotel Guest Reviews

Hotel Amenities

Hotel Amenities

- Total number of rooms - 15
- Free WiFi
- Wheelchair accessible: No
- Smoke-free property
- Luggage storage

Internet

Available in all rooms: Free WiFi

Available in some public areas: Free WiFi

Languages spoken

- English
- Spanish
- French

Room Amenities

- Television
- Private bathroom
- Hair dryer
- Iron/ironing board (on request)
- Cookware, dishware and utensils
- Kitchen
- Fridge
- Free toiletries
- Iron/ironing board
- Microwave
- Blackout drapes/curtains
- Shower only

Show all room amenities

Hotel Policies

Check-in

Check-in time starts at 2 PM


Minimum check-in age is: 18

Check-in time ends at midnight

Check-out

Check-out time is 10:30 AM

Payment types



Children and extra beds

- Children are welcome.
- Kids stay free! Up to 10 children stay free when using existing beds.
- Rollaway/extra beds are available for GBP 25.0 per stay.
- Cribs (infant beds) are not available.

Pet Policy

- Pets not allowed (service animals welcome)

During the initial site visit, it was observed that the front doors lacked doorbells. The owners were questioned about how deliveries and post were received, but no adequate response was provided. Subsequent to that visit 5 days later, two doorbells had been added to the external front door on the ground floor entrance that leads up to the units.

Although the doors to each individual unit were numbered, an imprint of the previous different door numbers was visible. Together with the haphazard arrangement of the doors, it appears that door numbers may have been swapped around, which suggests no fixed numbering. This also raises doubts about the credibility of the evidence provided in the CLEUD applications referenced 2023/2017/P and 2022/5295/P, as it is unclear whether the evidence pertained to the respective units. When looked at in conjunction with all the other evidence found, it does suggest a transient use, as permanent residents would likely retain a fixed door number.

Based on the evidence gathered during the visit and that found online, it is evident that the Property has been sub-divided to form 15 self-contained units in use as temporary sleeping accommodation/short-term holiday lets falling within Use Class C1 Hotels with ancillary concierge/office space on the ground floor.

The Property is being advertised on a wide range of websites for short stay, transient, accommodation as a hotel or aparthotel, which all indicate the use of the Property for visitor accommodation. The units are clearly laid out and marketed as a full time professional short term lets. The Property is advertised as 'Ideally located in the prime touristic area of Camden SMJ Groups (267 Eversholt Street) promises a relaxing and wonderful visit. The hotel offers guests a range of services and amenities designed to provide comfort and convenience. Private check in/check out free Wi-Fi in all rooms shops 100% non-smoking fax or photo copying in business center are there for guest's enjoyment. Television LCD/plasma screen clothes rack linens locker mirror can be found in selected guestrooms. The hotel offers various recreational opportunities. SMJ Groups (267 Eversholt Street) combines warm hospitality with a lovely ambiance to make your stay in London unforgettable.'

On Travelocity the building is described as "Smj Groups 267 Eversholt Street offers 15 accommodations with hair dryers and irons/ironing boards. Accommodations at this 3-star hotel have kitchens with refrigerators, stovetops, microwaves, and cookware/dishes/utensils. Bathrooms include showers and complimentary toiletries. Guests can surf the web using the complimentary wireless Internet access. Flat-screen televisions come with digital channels. Irons/ironing boards and hair dryers can be requested."

Evidence including site visit photos and webpages to support the Council's case highlighted in this delegated report is presented at appendices A to I linked to the appealed CLEUD applications 2023/2017/P and 2022/5295/P.

Based on the planning history of the site and images available on google street view, the Council would conclude that the building was previously in use as three flats in residential use with a retail shop on the ground floor and basement in commercial use. Council tax continues to only be paid for three residential units for the building. Business rates continue to be paid for the ground floor and basement.

It should be noted that the Council have served notices to other properties owned by the same developers alleging a similar change of use. They are detailed accordingly below;

1 Swinton Street London WC1X 9NL - EN23/0495; Without planning permission: the change of use from a HMO to temporary sleeping accommodation/holiday lets. Issued on 23 October 2023

3 Swinton Street London WC1X 9NL - EN23/0759; Without planning permission: the change of use from a HMO to temporary sleeping accommodation/holiday lets. Issued on 23 October 2023

158 Camden High St London NW1 0NE : 5 notices; issued on 17 November 2023

EN23/0506 (Studio flat, 1st Floor Front) - Without planning permission: The change of use of the Studio flat, 1st Floor Front from residential use to use as a temporary sleeping accommodation.

EN23/0902 (Flat A) - Without planning permission: The change of use of Flat A from residential use to use as a temporary sleeping accommodation.

EN23/0903 (Flat B) - Without planning permission: The change of use of Flat B from residential use to use as a temporary sleeping accommodation.

EN23/0904 (Flat C) - Without planning permission: The change of use of Flat C from residential use to use as a temporary sleeping accommodation.

EN23/0905 (Flat D) - Without planning permission: The change of use of Flat D from residential use to use as a temporary sleeping accommodation.

Relevant policies / GPDO Category

National Planning Policy Framework (2023)

- 2. Achieving sustainable development - Paragraph 8, 11
- 3. Plan-making - Paragraph 15
- 4. Decision-making - Paragraph 55, 59
- 5. Delivering a sufficient supply of homes – Paragraph 60
- 6. Building a strong, competitive economy – Paragraph 85
- 7. Ensuring the vitality of town centres – Paragraph 90
- 8. Promoting healthy and safe communities – Paragraph 97
- 9. Promoting sustainable transport – Paragraph 108
- 14. Meeting the challenge of climate change, flooding and coastal change – Paragraph 157
- 16. Conserving and enhancing the historic environment – Paragraph 195

The London Plan (2021): policies H8 and H9

Camden Local Plan (2017)

H1 Maximising housing supply

H3 Protecting existing homes

H6 Housing choice and mix

H7 Large and small homes

A1 Managing the impact of development

A4 Noise and vibration

D1 Design

D2 Heritage

T1 - Prioritising walking, cycling and public transport

T2 – Parking and car-free development

DM1 - Delivery and Monitoring

E1 Economic development

E2 – Employment premises and sites

Camden Planning Guidance

CPG Design (2021)

CPG Amenity (2021)

CPG Employment sites and business premises (2021)

CPG Housing (January 2021)

CPG Transport (January 2021)

CPG Developer Contribution (March 2019)

Assessment

Planning history:

<u>2023/2017/P</u>	267 Eversholt Street London NW1 1BA	Use as 10 self-contained flats.	APPEAL LODGED	17-08-2023	
<u>2022/5295/P</u>	267 Eversholt Street London Camden NW1 1BA	Use as 5 self-contained flats.	APPEAL LODGED	05-06-2023	
<u>2016/2248/P</u>	267 Eversholt Street London NW1 1BA	Retention of a first floor rear extension to existing flat.	WITHDRAWN	24-05-2016	Withdrawn Decision
<u>2015/5206/P</u>	267 Eversholt Street London NW1 1BA	Excavation to create basement level, ground floor rear extension and single storey outbuilding to the rear to enlarge the retail shop (retrospective).	FINAL DECISION	25-09-2015	Granted
<u>PE9800389</u>	267 Eversholt Street, NW1	Change of use from existing basement storage space to a self-contained two bed garden flat, as shown on four unnumbered drawings consisting of elevation, proposed plan, proposed layout and existing plan.	FINAL DECISION	18-06-1998	Refuse Planning Permission
<u>28376</u>	267 Eversholt Street, NW1.	Change of use, including works of conversion, to provide two self-contained flats and a self-contained maisonette.	FINAL DECISION	17-04-1979	Conditional
<u>2015/1629/INVALID</u>	267 Eversholt Street London NW1 1BA	Erection of rear extension of existing retail unit at basement & ground floor levels, and part first/part second floor rear extension of residential units.	WITHDRAWN	--	Withdrawn Decision
<u>2014/1615/INVALID</u>	267 Eversholt Street London NW1 1BA	TO KEEP OPEN UNTIL MID JULY. AGENT IS GETTING INFO TOGETHER. Change of use from storage area (1st to 4th floor) and basement area all associated with retail (Class A1) to 5 x self-contained flats (Class C3) to create 1 x 2-bed, 3 x 1-bed & 1 x studio at basement and from 1st to 4th floor level and retaining retail (Class A1) at ground floor level and associated alterations to include rear dormer extension at 4th floor level, addition of staircase from ground to basement to existing front lighwell, excavation at basement level to accommodate staircase and new fenestration to side elevation and new shopfront.	WITHDRAWN	--	Withdrawn Decision

ISSUES:

- Issue 1 – Whether there has been a breach of planning control at the Property.
- Issue 2 – Whether it is expedient to issue an enforcement notice.

ANALYSIS

Issue 1 – Whether there has been a breach of planning control at the Property

Pursuant to s. 57 of the Town and Country Planning Act 1990 (“**TCPA 1990**”), planning permission is required for the carrying out on land of any development. Pursuant to s. 55 TCPA 1990 development is defined as the "carrying out of building, engineering, mining or other operations in, on, over or under the land or the making of any material change in the use of any buildings or other land". As such, planning permission needs to be obtained if there is a material change of use of any buildings or land.

Having regard to the evidence gathered through the Council’s investigation, as set out above, it is considered that there has been a material change of use from mixed use as 3 flats in C3 residential use and a single commercial retail unit in use Class E (Commercial) to mixed use of 15 units of temporary sleeping

accommodation/short term lets within Use Class C1 Hotels with the shop being used for ancillary concierge purposes (“**the Unauthorised Development**”). The Unauthorised Development, being a material change of use, amounts to development requiring planning permission. No planning permission exists for this development. Accordingly, there has been a breach of planning control within s. 171A(1)(a) TCPA 1990.

Issue 2 – Whether it is expedient to issue an enforcement notice

The following sections of this report consider the impacts of the Unauthorised Development before reaching a judgment on the expediency of enforcement action.

Loss of permanent residential accommodation (3 residential flats in C3 use)

The Unauthorised Development reduces the stock of permanent housing available to people who wish to live in Camden. In a time of an acute housing shortage the Council cannot afford to lose private dwellings in this manner.

The London Plan recognises the importance of maintaining London’s housing stock. Supporting paragraph 4.9.3 of Policy H9 in particular specifically states:

“The use of dwellings as short-term holiday rentals can have a detrimental impact on neighbours’ residential amenity and community cohesion in the wider area where concentrated in a particular location. The use also reduces the supply of homes available for people to live in.”

Policy H9 of the London Plan advises that given the level of need, existing housing should be retained where possible and appropriate, except where there are acceptable plans for its replacement. It states:

'Boroughs should take account of the impact on housing stock and local housing need when considering applications for a change of use from housing to short stay holiday rental accommodation to be used for more than 90 days a year'.

Policy H3 of Camden's Local Plan 2017 seeks to protect *'housing from permanent conversion to short-stay accommodation intended for occupation for periods of less than 90 days'*.

Photos and screenshots of websites gathered by the council show that the building is laid out and marketed for temporary sleeping accommodation as explained above.

Policy E3 Tourism states that the Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation, however it also states that all visitor accommodation must (h) not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems and (i) not lead to the loss of permanent residential accommodation.

The Council could allow smaller-scale visitor accommodation but only in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage however this site is located outside of the town centre of Camden Town. The Council will only consider tourism development outside of the areas listed above where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough. The development provides for visitor accommodation for paying tourists but nothing more.

The establishment of visitor accommodation in this location poses a detrimental impact on the mix of uses in the area. The development's orientation towards tourist accommodation, as evident through its association with platforms like booking.com, runs counter to the diverse and balanced usage envisaged for the locality. This departure from the intended mix of functions threatens the harmonious blend of residential, commercial, and community spaces that contribute to the overall character and vitality of the area.

Moreover, the completion of this development has resulted in the unacceptable loss of permanent residential accommodation. This depletion of permanent accommodation further exacerbates the negative consequences of the development, contributing not only to a disruption in the mix of uses but also to the local community's stability. The shift towards short-term, transient occupancy compromises the area's ability to sustain a stable and cohesive residential population, which is vital for fostering a sense of community and maintaining the social fabric of the neighbourhood.

In light of these considerations, it is deemed that such visitor accommodation would, indeed, undermine the carefully planned mix of functions within the community and have an adverse impact on the overall fabric of the area, exacerbated by the unacceptable loss of permanent accommodation.

Moreover, the loss of housing without ensuring that the development aligns with the needs and characteristics of local areas and communities represents a failure to contribute to the policy's goal of fostering strong and successful communities. The development lacks a balanced approach that considers the broader community context, leading to a significant deficiency in supporting and enhancing the overall well-being of the affected residents and their neighbourhoods.

Noise and disturbance to the detriment of the neighbouring occupiers

In respect to Policy A4 (Noise and vibration) of the local plan and CPG (Amenity) (section 6 Noise and vibration) the Council seeks to restrict short-term letting because holiday-makers and others staying properties for short periods are less likely to treat their holiday flat in a manner that has respect for the peace and privacy of other, permanent, residents who live within the vicinity, and therefore residential amenity is often diminished through noise and disturbance. The site is located within a busy mixed commercial residential location; however, the access point is located in a predominantly residential street. The comings and goings to the

property is likely to give rise to an associated increase in overall noise and disturbance, as visitors are more likely to come and go at different hours compared to permanent residents impacting residential amenity.

Policy A1 of the local plan, which focuses on managing the impact of development, outlines the Council's commitment to safeguarding the quality of life for both occupants and neighbours.

The development has resulted in an unacceptable level of harm to amenity, particularly concerning noise and disturbance, adversely impacting the well-being of both residents and the surrounding community. This unacceptable harm to amenity is further compounded by the inadequate assessment and addressing of transport impacts. The development falls short in fulfilling the policy's intent to manage the impact of development on transportation, negatively affecting communities, occupants, neighbours, and the existing transport network.

Loss of Class E Commercial space in respect of the Basement and Ground floor

Policy E2 (Employment premises and sites) of the local plan seeks to resist the development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction that:

- a. the site or building is no longer suitable for its existing business use; and
- b. that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time and seeks to safeguard existing employment sites and premises in the borough.

Neither of these aspects has been adequately demonstrated. It is our assessment that the Unauthorised Development fails to make a positive contribution to the continued growth of Camden's successful economy. Furthermore, this has led to a reduction in both the quantity and diversity of available employment opportunities, attributed to the loss of commercial floor space.

While the shop unit is an integral part of the C1 Hotel Operation, contributing to employment, it is not specifically designated for independent office use; and is not considered comparable to the use which has been lost.

Transport

Policy T1 seeks to advance sustainable transport by prioritising walking, cycling, and public transport. This is realised through enhancements to pedestrian-friendly public spaces, road safety measures, and the provision of crossings. The policy also entails contributions to cycle networks and facilities, as well as improvements to links with public transport. These comprehensive measures are implemented to ensure that the Council attains its zero-carbon targets. However, the current development fails to include provisions for cycle storage, thereby not aligning with the requirements set out in Policy T1. To address this deficiency, the Council aims to secure a Section 106 agreement, seeking a contribution towards cycle facilities in the area. In the absence of such an agreement, the development is deemed unacceptable as it does not adhere to the specified criteria in Policy T1 regarding sustainable transport measures.

Policy T2 requires all new non-residential developments will also be expected to be car free, including the redevelopment and/or conversions of existing sites with new occupiers to be car free with access to parking permits removed by a S106 Legal Agreement. Car free development has not been adequately secured in this case and nor has it been offered in any form.

Conclusion on expediency

Each of the harms identified above weigh significantly against the Unauthorised Development and significantly outweigh the limited, if any, benefits of the Unauthorised Development. Having regard to the development plan and the other material considerations, it is concluded that the issue of an enforcement notice is expedient in the public interest.

This is particularly so in the context of an acute housing shortage and the imperative to preserve the viability of the town centre's high street, expedient action is deemed necessary to rectify these planning breaches.

The steps recommended below are necessary to remedy the breach of planning control identified above and to remedy the harm to amenity from the Unauthorised Development identified above.

Recommendation:

That the Borough Solicitor be instructed to issue an Enforcement Notice under Section 172 of the Town and Country Planning Act 1990 (as amended) for 267 Eversholt Street and officers be authorised in the event of non-compliance, to commence legal proceedings under Section 179 of the TCPA 1990 or other appropriate power and/or take direct action under Section 178 of the TCPA 1990 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, the conversion of the Basement, ground, first, second, third, fourth and fifth floors from three residential flats and commercial accommodation to a development comprising fifteen units of temporary sleeping accommodation with ancillary concierge/office space on the ground floor.

WHAT ARE YOU REQUIRED TO DO:

1. Cease the use of the building as temporary sleeping accommodation.
2. Cease the operation of the ground floor shop as a concierge service.
3. From the basement, remove from the property all sets of bathing facilities, toilets, basins, kitchens, and cooking facilities.
4. From the ground floor, remove all but one set of toilets and basins, and all sets of bathing facilities, kitchens and cooking facilities
5. From the first floor, remove all but one set of bathing facilities, toilets, basins, kitchens and cooking facilities
6. From the second floor, remove all but one set of bathing facilities, toilets, basins, kitchens and cooking facilities
7. From the third, fourth and fifth floors, remove all but one set of bathing facilities, toilets, basins, kitchens and cooking facilities
8. Restore the property to its previous lawful state, incorporating a Class E commercial premises on the basement and ground floor, and three residential flats in the C3 use on each of the first, second, and third floors, with the fourth and fifth floors being integrated into the flat on the third floor.
9. Remove from the property all constituent materials resulting from the above-mentioned works.

PERIOD OF COMPLIANCE:

3 Months

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

1. It appears to the Council that the above breach of planning control has occurred within 10 years
2. The unauthorised use of the building results in the unacceptable loss of permanent residential accommodation contrary to policies A1 (Managing the impact of development), H1 (Maximising housing supply) and H3 (Protecting existing homes), of the Camden Local Plan (2017)
3. The high turnover of occupiers results in increased incidences of noise and disturbance to the detriment of the neighbouring occupiers contrary to policies A1 (Managing the impact of development), H3

(Protecting existing homes) of the Camden Local Plan (2017) and Camden's Planning Guidance (Amenity) 2021

4. The change of use of the ground floor shop, in the absence of sufficient justification demonstrating that the premises are no longer suitable for continued business use, would fail to support economic activity and result in the loss of employment opportunities within the Borough contrary to Policies E1 (economic development) and E2 (employment premises and sites) of the London Borough of Camden Local Plan 2017.
5. In the absence of cycle parking, the unauthorised use of the building fails to encourage sustainable modes of transport, contrary to Policies T1 (Prioritising walking, cycling and public transport) and DM1 (Delivery and monitoring) of the Camden Local Plan 2017.
6. In the absence of a legal agreement securing car-free housing, the unauthorised use of the building has the potential to contribute to parking stress and congestion in the surrounding area and fail to promote more sustainable and efficient forms of transport, contrary to Policies T2 (Parking and car-free development) and DM1 (Delivery and monitoring) of the Camden Local Plan 2017.