

**London Borough of Camden**  
**Strategic Planning**  
5 Pancras Square  
London  
N1C 4AG

**Department: Planning**

Our reference: LDF06/LDD25/LP02/JB01

Date: 13 March 2024

By email: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local  
Development) (England) Regulations 2012**

**Re: London Borough of Camden Local Plan Regulation 18 Consultation.**

Dear Brian,

Thank you for consulting the Mayor of London on the proposed New Local Plan for Camden (Regulation 18) consultation. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. A separate detailed response has been prepared by Transport for London Spatial Planning on transport matters.

This letter provides advice and sets out where you should make amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021). The LP2021 was formally published on the 2 March 2021, and now forms part of the London Borough of Camden's (LBC's) Development Plan and contains the most up-to-date policies.

The GLA are happy to work with LBC following on from this consultation and prior to the next round of consultation to help resolve these issues.

### **Opportunity Areas and Central Activities Zone**

LBC contains three Opportunity Areas identified in the London Plan at Tottenham Court Road, Kings Cross and Euston. The draft Plan states that both Tottenham Court Road and Kings Cross are largely complete and there is unlikely to be significant further development in the plan period.

Table 2.1 in the LP2021 sets out an indicative capacity for 2,800 – 3,800 homes in the Euston Opportunity Area along with 8,600 – 15,000 jobs. As set out in paragraph 2.1.1 of the LP2021, these figures should be used as a starting point to be tested through the assessment process. Currently, the strategy for the Euston Opportunity Area is still being developed, with an Area Plan scheduled to follow in the summer of 2024. However, it is

recommended that the draft Plan provides an outline of what is expected to come forward in the Euston Area with indicative capacities and a clearer definition of the boundaries of the Opportunity Area. This will help to reflect the importance of the Euston Area in the overall strategy and provide a certain level of clarity while the Area Plan is being developed.

Within LBC is an area of the Central Activities Zone (CAZ), as defined in Policy SD4 of the LP2021. Part N of Policy SD4 sets out that Development Plans should look to define the boundary in detail and included on policy maps. As per Policy SD5 of the LP2021, the draft Plan should ensure that residential development within in the CAZ does not compromise the strategic uses as set out in paragraph 2.4.4 of the LP2021. Part G of SD5 also sets out that any mixed-use development within the CAZ should not lead to a net loss of office floorspace and the use of land use swaps, credits and off-site contributions should also be explored as per Part H.

## **Housing**

Table 4.1 of the London Plan Policy H1 sets out a 10-year target of 10,380 new homes to be delivered from 2019/20 until 2028/29 within LBC, equivalent to 1,380 homes per year. Included in this target, a minimum 3,280 new homes should be identified from small sites (set out in Table 4.2 of the LP2021). The draft Plan should include a clear commitment to meet its LP2021 housing target by 2029 being clear how they will achieve that.

Policy H1 of the draft Plan sets out a target of 11,550 new homes over a 15 year plan period of 2026 to 2041, equivalent to 770 homes per year. This is significantly below the current annualised London Plan target and is of concern.

The draft Plan states that this figure is derived from rolling forward the small sites target as per Table 4.2 of the LP2021 across the plan period as well as taking into account the capacity of large sites in the 2017 SLHAA referenced in paragraph 4.1.11 of the LP2021. However, it should be noted that there is greater uncertainty on sites contained within the 2017 SLHAA that were expected to come forward in the later phases and new sites might have become available since the SLHAA was carried out.

Paragraph 4.1.11 also sets out that when calculating a housing target beyond 2029, London boroughs should also include additional capacity that could be delivered as a result of any committed transport infrastructure improvements, as well as additional sites that have come forwards as part of the borough's call for sites. Further to this, LBC should be aware of the ongoing SLHAA work (referred to as LAND4LDN) that is part of the review of the London Plan and any sites that might be identified as the process continues.

In determining capacity, Objective GG2 of the LP2021 sets out the importance of making the best use of land within London, with Part C promoting higher densities in areas that are well connected to infrastructure and jobs. LBC should ensure that in the evidence base to support the draft Plan, densities are set at an appropriate level making the best use of land.

Policy H1 in the draft Plan should also set out whether there has been a shortfall in delivery since 2019 and factor this into the overall housing need. Any shortfall should be made up

over the remaining time up to 2029 to account for the whole London Plan housing target period.

While the draft Plan recognises that a forthcoming review of the London Plan would likely change the housing target for LBC, which is welcomed, it is recommended that there is flexibility in the draft Plan to safeguard for this eventuality. It is also noted that the current London Plan does not meet London's identified need and therefore the overall amount of housing required annually should not be expected to reduce.

## **Small Sites**

Due to the importance of the delivery of homes on small sites in the borough, the Mayor's LPG on Small Sites Design Codes and Optimising Site Capacity: A Design Led Approach<sup>1</sup> provides guidance to help boroughs capitalise on the ability of small sites to contribute towards housing delivery. The Mayor welcomes LBC referencing the LPG within the draft Plan. It will be crucial in light of the overall low housing figures to ensure that LBC's policy framework provides a positive and clear approach to drive up delivery of homes on small sites.

## **Affordable Housing**

Policy H4 of the draft Plan reflects the Mayor's strategic target that 50% of all housing is to be affordable, which is welcomed. The draft Plan sets out a sliding scale to secure affordable housing contributions, using a floorspace based approach rather than habitable rooms to calculate the percentage of contribution required increasing in 2% increments for every additional 100sqm (equivalent to 1 unit) for schemes under 25 units. LBC should note that the required level of affordable housing should be based on gross residential development and not on net increases in housing as currently set out in Part B of Policy H2 in the draft Plan. Paragraph 4.5.3 of the LP2021 is clear that in some cases it may be appropriate to use habitable floorspace as a measure of affordable housing. The definition of what constitutes habitable floorspace is included in the glossary of the LP2021 and should be the one applied in the draft Plan.

The sliding scale approach is not in line with Policy H5 of the LP2021 which sets out the Threshold Approach to affordable housing contributions. The Threshold Approach seeks to limit those circumstances where viability evidence is required by providing an incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route, thereby avoiding scrutiny of viability at various stages of development. The threshold set in Policy H5 has been informed by viability testing and embeds affordable housing requirements into land values which creates consistency across London.

It is also unclear whether the draft Plan takes account of LP2021 Policy H5, in relation to the threshold levels of 50% for affordable housing on publicly owned sites and designated industrial sites, where there is a net loss of industrial capacity in order to qualify for the Fast

---

<sup>1</sup> <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63501>

Track Route. The proposed approach also does not account for those sites where there is a portfolio agreement with the Mayor.

The sliding scale approach to affordable housing in the draft Plan may result in more applications following the Viability Tested Route. On average this route provides less affordable housing and results in longer determination times when compared to those that take the Fast Track Route.

Policy H5 of the LP2021 has been proven effective at securing affordable housing with the 2022 Annual Monitoring Report establishing that 84% of all strategic applications provided at least 35% affordable housing, this represents an increase from 53 per cent of schemes in 2018. The average rate of affordable homes per scheme was 41 per cent of all units and 45 per cent of all habitable rooms.

On average schemes that were referable to the Mayor that followed the Fast Track Route provided 44 per cent affordable housing in 2022, whereas viability tested schemes provided only 28 per cent. Applicants also typically seek to demonstrate the existence of 'viability deficits' through the viability assessment process and use these as a credit in viability review mechanisms which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development.

LBC should consider if there is an opportunity for the proposed sliding scale approach to be combined with the Mayor's Threshold Approach. The policy should also reflect the different threshold levels of affordable housing required to qualify for the Fast Track Approach on different sites as set out in LP2021 Policy H5 Part B. As currently written, the policy could be a potential General Conformity issue with the LP2021.

## **Gypsy and Traveller Accommodation**

Draft Plan Policy H11 sets out that LBC have identified the need for 16 additional pitches for the Gypsy and Traveller community through the 2014 accommodation assessment. The draft Plan should use site allocations to explore opportunities to meet this need. As set out in Policy H14A of the LP2021 LBC should plan to meet identified need and must include the ten-year pitch targets.

## **Tall Buildings**

Policy D2 of the draft Plan sets out LBC's approach to tall building development within the borough. At part A the policy defines tall buildings as those which are greater than 40m in the Central Activities Zone and over 30m elsewhere. This is consistent with Policy D9 of the LP2021 and is welcomed. Map 13 sets out the threshold for when a development is considered to be 'tall' in two separate areas. This is in line with D9 of the LP2021. However, when identifying the specific locations suitable for tall buildings, the policy does not identify the appropriate suitable height in each of the different locations but has this information in the specific site allocations.

LBC should consider whether it would be more appropriate to identify areas, rather than specific sites (for which boundaries might change in the future), as suitable for tall buildings.

This is particularly relevant where the draft Plan identifies several adjoining sites as separate areas on Map 13. LBC should also identify the harm that would arise as a result of a tall building being proposed outside the identified areas or sites and should not exclude areas where harm cannot be identified. This documentation will be critical for considering any planning applications for tall buildings that come forward outside identified areas in future. LBC should assess whether areas surrounding identified sites are also suitable for tall buildings, especially where they share similar townscapes.

It would make the policy much clearer if the information on suitable heights in the identified areas was contained within the policy text itself rather than in the site allocations and appendix to the draft Plan.

## **Industrial and Employment Land**

Policy IE3 of the draft Plan sets out it will 'manage and protect' industrial and warehousing land, although some sites could be redeveloped to deliver wider objectives. Part C of Policy IE3 sets out the factors that redevelopment of industrial sites should pay regard to in the application process. This is in line with Policy E4 of the LP2021 which sets out the importance of having sufficient industrial uses due to their roles in supporting London's economy. Part C of Policy IE3 sets out that any releases of industrial land, including non-designated sites, should be facilitated through intensification, co-location and substitution as per Policy E7 of the LP2021.

The draft Plan should note the significance of its location in the Central Services Area (CSA). Paragraph 6.4.7 of the LP2021 makes it clear that all boroughs in the CSA should recognise the need to provide essential services to the CAZ and in particular sustainable 'last mile' distribution/logistics, 'just-in-time' servicing, waste management and recycling, and land to support transport functions.

The draft Plan should be clearer on how much additional industrial land in LBC is required in order to meet demand in the borough over the plan period given the low levels of vacancy as per the London Industrial Land Supply Study 2020<sup>2</sup> and how this will be delivered through individual planning applications and site allocations.

Policy IE3 is broadly in line with the LP2021 Policies E4 and E7 which seek to ensure there is sufficient industrial sites within London, and that existing sites are intensified where suitable. However, there is concern over site allocation C3 KT3. This allocation covers LBC's one designated Industrial Area, which is equivalent to the LP2021 Local Strategic Industrial Site (LSIS) designation. The allocation should set out more detail on the amount of industrial space currently on site and the amount that would be expected post-development in order to maintain the area as a viable industrial location. Similarly, sites on Camley Street and Regis Road both provide significant industrial floorspace, including uses B8, which should be retained through co-location and because of LBC's location in the CSA.

---

<sup>2</sup> [London Industrial Land Supply Study 2020 Main Report](#)

# GREATER LONDON AUTHORITY

Policy E4C of the LP2021 advocates a plan, monitor and manage approach towards industrial land and capacity. In light of this, LBC should commit to producing a monitoring framework for industrial capacity in the borough which will help to inform decision making.

## **Office Space**

The draft Plan identifies the need for 340,000sq.m. of office space over the plan period with 210,000sq.m. of this total already in the planning pipeline. Policy E1 of the LP2021 supports the development of new office space where there is demonstratable need, and it should be focused within the Central Activity Zone (CAZ), town centres and Opportunity Areas. The draft Plan and site allocations should reflect the focus of office into these locations in order to take advantage of existing infrastructure and connectivity and avoid allocations outside of these areas as the draft currently does.

## **Next steps**

I hope these comments help to inform the preparation of LCE's Local Plan. We continue to offer our support to work with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021, as well as delivering the Council's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Jonathan Blathwayt on 020 7983 4000 or at [jonathan.blathwayt@london.gov.uk](mailto:jonathan.blathwayt@london.gov.uk).

Yours sincerely



Lisa Fairmaner

## **Head of London Plan and Growth Strategies**

Cc: Anne Clarke, London Assembly Constituency Member  
Sakina Sheikh, Chair of London Assembly Planning and Regeneration Committee  
National Planning Casework Unit, DLUHC