

PART 4
LAND USE PRINCIPLES

Existing land use policies

Part 4 sets out *Land use principles* which will help us manage the activities in the area to achieve our *Vision and Objectives* for Fitzrovia set out in Part 3 of the Plan. Objectives that are particularly relevant to land use principles are:

- ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and addresses the impact of growth on residential amenity;
- supporting the residential community by providing a range of facilities, services and places; and
- ensuring an environmentally sustainable future.

These *Land use principles* do not seek to guide every activity that takes place in Fitzrovia, but are directed towards those land-uses where a Fitzrovia-specific approach to applying our LDF policies is needed to achieve the Plan's objectives.

Consequently, this section needs to be read alongside the full range of policies in Camden's Core Strategy 2010-2025 and Development Policies 2010.

Camden's Core Strategy policies CS5 and CS9 seek to support strong residential communities and address the balance between development that supports Central London's role as the focus of capital city functions and development that meets the needs of local communities. These aims have particularly informed the land-use principles for Fitzrovia. The issues raised by policies CS5 and CS9 and by related parts of Camden's Development Policies 2010 are summarised in the text box here, but the policies should be referred to in full in relation to prospective developments.

Achieving a successful Central London and managing the impact of growth

Development in Fitzrovia should help to minimise the impact of growth and development (policy CS5) and achieve a successful Central London (policy CS9) by:

- balancing the needs of development that supports Central London's economic, social and cultural role with the needs and characteristics of the local area and community;
- supporting Central London as a focus for homes, offices, hotels, shops, and medical, educational, cultural and research institutions (see also policies CS1, CS5, CS6, CS7, CS8, DP1, DP10, DP12, DP13, DP14);
- seeking to ensure that development contributes towards strong and successful communities by protecting residential amenity and supporting community facilities (see also policies CS10, DP15, DP26).

Although *Land use principles* are presented separately from the *Character areas and urban design principles* in Part 5 of the Plan, they are heavily inter-related, with fine-grained building patterns favouring independent retailers and/ or housing and larger plots favouring corporate offices and institutions. Considerations of future land use should not be considered against Part 4 of the Plan in isolation. For a summary of policies that relate more closely to urban design, please see page 70.

Housing and affordable housing

Principle 1

The Council regards housing as the priority land use of the Local Development Framework.

The Council will promote the development in Fitzrovia of permanent self-contained housing (in Use Class C3) unless there are strong economic reasons why such development would be inappropriate.

In applying mixed-use and affordable housing policies the Council will aim to ensure that:

- additional non-residential floorspace is matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development, and
- where housing and affordable housing contributions in Use Class C3 are required, they are provided on the development site or elsewhere in reasonable proximity to the development site, and within the Plan area wherever possible.

Where student housing is proposed in association with the development of additional non-residential floorspace for an educational institution, the Council will positively consider off-site provision, including provision outside the Plan area.

The Council will negotiate to seek the maximum reasonable amount of affordable housing, and to seek types of affordable housing that are appropriate in the context of the high house prices and market rents in Fitzrovia and the incomes of households in need of affordable housing.

When considering the mix of homes of different sizes in development, including the conversion of existing homes, the Council will seek to ensure a supply of large homes available to:

- households who currently suffer from overcrowding, and
- growing families who would otherwise need to seek larger housing elsewhere.

The Council will not attach the highest market dwelling size priority to 2-bedroom homes in Fitzrovia.

The Plan's objectives include supporting residential communities and achieving more housing and affordable housing. These objectives are consistent with the Camden Core Strategy 2010-2025, which states that the Council regards housing as the priority land-use of Camden's Local Development Framework. Camden's Core Strategy also indicates that the Council will seek a variety of housing types suitable for different groups. In pursuing the Area Action Plan's housing objectives, the Council will seek types of housing suitable for the groups identified in the Core Strategy, including families, people with mobility difficulties and older people.

Thirteen of the Plan's Opportunity Sites are potentially able to contribute to the development of additional self-contained homes. However, given the mixed-use character of the area, these sites are not allocated exclusively for housing. Furthermore, up to five of these sites may be developed primarily for medical or healthcare uses. To meet the Plan's objectives the Council will therefore seek to maximise the delivery of housing from unallocated sites within Fitzrovia, including development of underused and vacant properties for housing (taking into account any other uses needed), and inclusion of housing alongside non-residential uses as part of mixed use development.

The National Planning Policy Framework (NPPF) indicates that in areas of housing need, councils should generally approve conversion of commercial buildings (in the B use classes) to housing, unless strong economic reasons would make this inappropriate. Principle 1 is consistent with the national policy. Many of the office premises in the Plan area were originally designed as homes, and residential conversion of some of these properties may be appropriate. In particular, many of the Listed townhouses surrounding Bedford Square are currently in business use. Some residential conversion in Bedford Square could have heritage and community safety benefits by securing the restoration of original features and increasing levels of activity and natural surveillance outside office hours. When considering proposals for conversion from business to residential use, the Council will have regard to relevant development plan policy criteria for retention of business use and Principle 4 of this Plan supporting small and medium enterprises.

Existing Policy DP1 in Camden's Development Policies indicates that where more than 200 sq m of additional floorspace is provided, up to 50% of all additional floorspace in appropriate schemes should be provided as permanent self-contained housing. The housing should be provided on-site wherever practical. Principle 1 sets out the Council's particular approach for Fitzrovia, where we will aim to maximise the floorspace of the residential component so that it matches the non-residential component (i.e. achieves the full 50%).

The NPPF indicates that policies should seek development that creates an appropriate mix of uses. The NPPF also indicates that policies should seek mixed and balanced communities and secure any necessary affordable housing on the development site unless an off-site contribution can be robustly justified. The policies of the Camden Core Strategy 2010-2025 and Camden Development Policies 2010 comply with the NPPF by seeking mixed-use development and creation of mixed and inclusive communities, and expecting on-site affordable housing



contributions unless they cannot practically be achieved. To support the existing mixed-use character and mixed residential communities of Fitzrovia, Principle 1 seeks to ensure that permanent self-contained housing and any affordable housing required is delivered on-site or nearby (ideally within 500 metres) within the Plan area. Where no alternative site is available within the Plan area, the development is at the edge of the Plan area, or the developer's land-holdings are predominantly outside the Plan area, the Council may accept provision outside the Plan area provided it is still close to the development site (ideally within 500 metres).

Camden's Development Policies 2010 indicate that housing provided through Policy DP1 should generally be permanent self-contained housing in Use Class C3. However, where additional non-residential floorspace is being provided for a higher educational institution, student housing may be an acceptable alternative.

Part 2 of this Plan *Character and challenges* notes that Fitzrovia has a high proportion of students and private rented accommodation, and consequently a large part of the community is made up of short-term residents. To support retention of a community of longer-term residents, Principle 1 provides greater flexibility in Fitzrovia for off-site provision of any student housing sought through Policy DP1. We will guide proposals for student housing towards existing student housing sites (more details are given in *Principle 7 Student housing* below) or to locations outside the Plan area that are accessible to the institutions it will serve.

The types of affordable homes provided in Fitzrovia will be carefully assessed to ensure that they are affordable to the households that need them. Intermediate housing including shared ownership homes should be affordable to households whose annual income is in the range set out in the London Plan 2011 and subsequent London Plan Annual Monitoring Reports.

Market rents are beyond the reach of many families in housing need. When seeking the maximum reasonable proportion of affordable housing, the Council will encourage the provision of affordable housing that costs no more than 80% of local market rent (including service charges where applicable) and give priority to family homes at or around the level of guideline target rents as resources and development viability permit. Camden Planning Guidance CPG2 Housing provides more details about how the Council will implement development plan policies for affordable housing.

Over 30% of Fitzrovia homes have only 1 or 2 rooms (Census 2001, definition excludes halls, bathrooms, toilets and storage). Overcrowding is the most common element of housing need across the borough, and is also prevalent in Fitzrovia. However, compared with the borough, children are significantly under-represented in the area's households. The lack of large housing, both in the affordable sector and at the cheaper end of the market sector, limits opportunities for overcrowded households and young families to remain in the area. In Fitzrovia the Council will operate its policies on home sizes and conversions to increase the availability of housing for growing and overcrowded families. We will expect all residential development to include large homes, as required by Policy DP5 of Camden Development Policies 2010. The accompanying Dwelling Size Priorities Table will not apply to market homes in Fitzrovia, and the Council will attach a high dwelling size priority to market homes with 3-bedrooms or more, a medium priority to those with 2-bedrooms and a lower priority to those with 1-bedroom.

Relevant Area Action Plan objectives

Contributes to the key objective *ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses* by supporting residential communities and achieving more, well designed affordable housing



Relevant parts of Camden's Core Strategy and Development Policies

Policy CS1 – Distribution of growth

Policy CS6 – Providing quality homes

Policy CS9 – Achieving a successful Central London

Policy DP1 – Managing the impact of development on occupiers and neighbours

Policy DP2 – Making full-use of Camden's capacity for housing

Policy DP3 – Contributions to the supply of affordable housing

Policy DP5 – Homes of different sizes

Relevant parts of Westminster's Core Strategy

Policy CS1 – Mixed use in the Central Activities Zone

Policy CS15 – Meeting housing needs

Policy CS16 – Affordable housing

Relevant parts of the London Plan

Policy 2.11 – CAZ strategic functions

Policy 3.3 - Increasing housing supply

Policy 3.8 - Housing choice

Policy 3.10 - Definition of affordable housing

Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes

Policy 4.3 – Mixed use development and offices

Public open space

Principle 2

The Council will expect development in Fitzrovia that increases the use of open space to provide new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity.

The Council will implement a range of proposals set out in this Plan to increase and enhance the availability of public open space in Fitzrovia, with particular priority given to green spaces and recreation space for older children.

Public open space has a wide range of functions, including providing for sport, informal play, exercise, less formal recreation, experience of the natural environment, support of biodiversity, sustainable urban drainage, improving microclimates in urban areas, giving focus and structure to the surrounding area and contributing to the heritage value of the area.

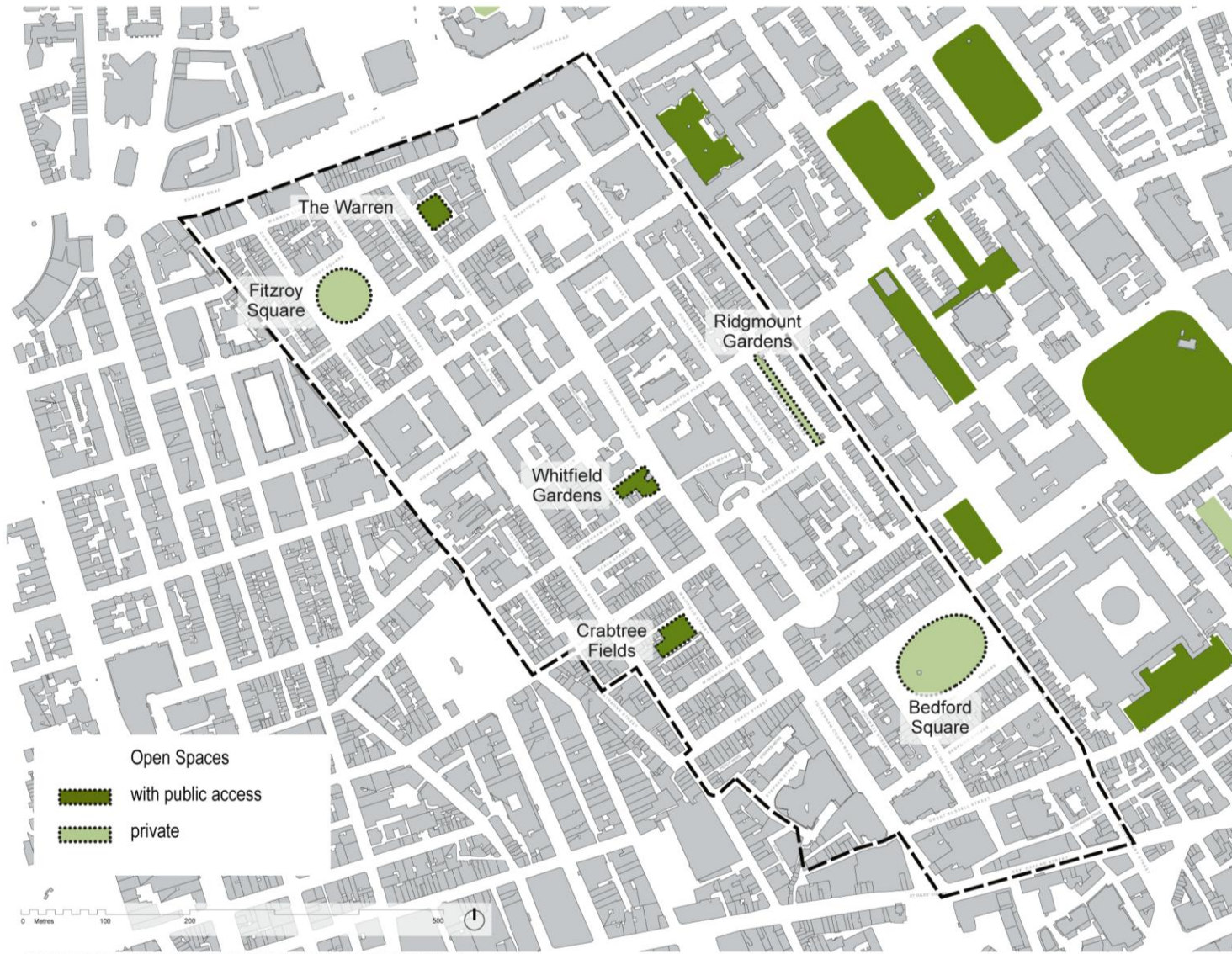
There are 3 publicly owned and accessible areas of off-street public open space in Fitzrovia, each covering approximately 1,000 sq m, amounting to less than 0.7 sq m per resident. There are no designated sites of nature conservation interest within the Plan area. More substantial public open spaces are available at

Russell Square and at Regent's Park (which is also a site of nature conservation interest), but these are more than 500 metres from most of Fitzrovia. There are impressive formal squares in the area at Fitzroy Square and Bedford Square. The streets around these squares provide significant paved areas for relaxation, but the central gardens are privately owned and are not generally open to the public.

Fitzrovia is considered to be severely lacking in public open space and access to nature conservation interest. There has been a steady growth in the number of residents and employees in Fitzrovia in the last 20 years. However, no addition to green public open space has been provided in the area since Crabtree Fields was laid out in 1985.

The Plan's objectives include identifying opportunities to create new publicly accessible open and green spaces. The Plan's Steering Group commissioned a Fitzrovia Open Space and Public Realm Study to identify opportunities to add to publicly accessible open spaces. Many of the study's suggestions have been incorporated into the Plan and details of the proposals appear primarily in Part 5 Character areas and urban design principles. Part 7 Delivery and Monitoring includes a Delivery Plan, which brings together the proposed measures relating to open space together with indicative information about the priorities attached to them.

Public open spaces



Suggestions incorporated in the Plan will be used to inform how we negotiate with developers to seek open space in association with development, negotiate with landowners for public access to private land, how we negotiate with other bodies such as the GLA for funding to support provision, and how the Council spends financial contributions from development.

Fitzrovia currently has only one public grassed area (Crabtree Fields) and one games court available for older children (The Warren). Green spaces and recreation space for older children will be particular priorities where an opportunity to provide additional open space arises. We will also seek opportunities throughout the area to provide green features and add to biodiversity and sustainable urban drainage through measures such as tree planting, soft landscaping, roof gardens and green and brown roofs.

Providing for occupiers of new development

Camden Development Policies 2010 indicates that developments that increase the resident, worker and visitor populations of the borough will add to demand for public open space, specifically schemes for 5-or-more additional dwellings, student accommodation for 10-or-more occupiers, or other developments of 500 sq m or more. The public open space needs of new occupiers are assessed as 9 sq m per resident and 0.74 sq m per worker in Central London. Camden Planning Guidance *CPG6 – Amenity* indicates how requirements will be calculated for individual developments to take account of dwelling size, workplace occupancy and occupancy of student halls. *CPG6* also sets out the distance threshold for different types of public open space. These distance thresholds should be used to guide the location of any off-site public open space provision.

Noting the severe local shortage of public open space and access to natural features, the Council will use every possible opportunity to seek direct provision of public open space on or close to the site that generates the demand. To achieve larger public open spaces we will strongly encourage developers to pool their open space contributions in a single location where they are generated by adjacent or nearby sites. For example, Part 6 of the Plan *Opportunity Sites* identifies the potential for a pooled space between Site 1 *Astor College*, Site 2 *Middlesex Hospital Annex*.

Where a development is unable meet the public open space needs of its occupiers by direct provision on or near the site, the Council will consider the use of financial contributions from development to improve existing open spaces in ways that increase their capacity where practical. If there are no opportunities to improve existing open space in a location reasonably related to the development, we will consider the use of financial contributions to create usable spaces within the street environment through works to highway space and private forecourts.

The scale of financial contributions included in Camden Planning Guidance *CPG6 Amenity* (adopted 2011) can make financial contributions a more attractive option for developers than making direct provision on or near the site. The Council is currently progressing towards introduction of a Camden Community Infrastructure Levy (CIL) and is also commencing a review of the Camden Core Strategy 2010-2025 and Camden Development Policies 2010. As part of this work we will review the appropriateness of the range and scale of infrastructure contributions secured through s106 planning obligations, including contributions to public open space.

To encourage direct provision and pooling of open space in a single location, the Council will consider formally acknowledging *public open space credits* where a developer directly provides



public open space in Fitzrovia in advance of any policy requirement arising from a development. The Council will then have the discretion to agree the use of 'banked' credits to offset policy requirements when development comes forward elsewhere in Fitzrovia. This arrangement will apply wholly within the Plan area, the scale of the credits must be formally agreed by the Council at the time they are created, and they will only be considered to offset requirements at a site elsewhere in the area where the needs of that development cannot be better served by on-site provision. Public open space credits will be specific to an applicant, developer or landowner, and will only be transferable where all parties formally agree the transfer.

Opportunities to increase and enhance the availability of public open space

On the basis of the Fitzrovia Open Space and Public Realm Study, we have identified three broad groups of opportunities to add to the supply of space, the availability of space and the usefulness of space. These are:

- new open spaces – spaces that are provided separately from the street environment, such as parks, gardens, play areas and sports courts;
- existing open spaces – similar spaces that could be made more useful through actions such as improving the layout, adding to facilities, or seeking greater public access; and
- highway space and private forecourts – spaces within the street environment that can make a contribution to informal recreation through new layouts, pedestrianisation, additional trees and planting, seating etc.

Specific types of open space and the treatment of the space will be selected taking into account their impact on nature conservation, biodiversity and heritage (including designated and undesignated heritage assets, and including the treatment of open spaces that are themselves heritage assets). In some cases, paved spaces rather than green spaces will be appropriate as the setting to a heritage asset. In some cases limited or partial public access is better able to foster biodiversity than full public access (e.g. green roofs).

The following sections give more detail about these opportunities.

New open space

Given the densely built up nature of Fitzrovia, in negotiations concerning development proposals, the Council will seek direct provision of wholly new open space by developer, within the

development site where possible or on a site nearby.

Opportunities we will consider include:

- creation of public open space at street-level within a development – ideally located where each one complements or adds to public open space created by other developments;
- creation of roof-top open spaces, gardens or amenity areas – where practical these should be accessible to the general public, but we will also consider whether additional pressures on public open space can be reduced by spaces dedicated to the occupiers of the development. We will also consider the biodiversity and sustainability benefits of roof features that limit roof access, such as solar panels and green or brown roofs designed to promote biodiversity or slow down water run-off;
- purchase of private property for the creation of public open space – this could be considered for parking spaces, forecourts and private gardens where there is potential for direct access from the street; and
- temporary use of cleared sites for public open space – sites awaiting development can make short term contributions at low costs using materials that can be put in place and removed quickly, for example grow-bag allotments – landowners will need to be satisfied that the use will cease when development is scheduled to start, and may wish to restrict access to certain times and groups.

Part 6 *Opportunity Sites* gives details of sites we have identified with development potential, and indicates where they also have potential to provide public open space. A high priority of the Plan is to seek a new public open space in the block between Howland Street, Charlotte Street, Tottenham Street and Cleveland Street, associated with Site 1 *Astor College*, Site 2

Middlesex Hospital Annex, and Site 4 *Tottenham Mews Day Hospital*.

Existing open spaces

The Open Space and Public Realm Study considered potential and priorities for spending on existing open space in Fitzrovia. As suggested by the study, the Plan gives priority to redesign of The Warren to improve facilities and create a park/ garden character. The Council will also negotiate with landowners to increase public access to private open spaces such as Bedford Square Gardens and Fitzroy Square Gardens.

The study's individual proposals for existing open spaces are considered in more detail in Part 5 *Character areas and urban design principles* and the Delivery Plan in Part 7 *Delivery and Monitoring*.

Highway space and private forecourts

The Council will seek to make more effective use of highway space to augment public open space in the area through:

- widening and extending footways;
- use of shared surfaces where appropriate;
- designing streets for use by pedestrians and cyclists;
- enhancing amenity through provision of street trees, planters and seating; and
- reducing other street clutter.



The Council will encourage measures on privately owned land such as forecourts and other underused fragments of land that can add to the amenity value of the public realm, such as the introduction of planters and seats.

The Open Space and Public Realm study made a wide range of suggestions for more effective use of open space within the street environment. High priority schemes supported by this Plan include creation of a public open space in Alfred Place by reclaiming part of the carriageway space and moving car parking. Details of all the study suggestions that the Council will take forward for further investigation are identified in Part 5 *Character areas and urban design principles* and the Delivery Plan in Part 7 *Delivery and Monitoring*.

The study did not include detailed examination of the feasibility of these schemes. Before specific schemes can be agreed for implementation, their feasibility will have to be considered in depth, consultation with key stakeholders and wider public consultation will be needed on potential designs, a source of

funding will need to be identified and the priority of these schemes will need to be weighed against other priorities in Fitzrovia and further afield. Where works to the public realm are involved, feasibility will include their impact on traffic movements, parking and services. Where possible the Council will seek funding from Transport for London to examine the feasibility of the schemes, and implement those schemes which are feasible, supported by the public, and prioritised by the Council.

Relevant Area Action Plan objectives

Contributes to the key objective *supporting the residential community by providing a range of facilities, services and places* through supporting and enhancing community facilities and identifying opportunities to create new publicly accessible open spaces and green spaces

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS15 – Protecting and improving our parks and open spaces and encouraging biodiversity

Policy DP31 – Provision of and improvements to open space and outdoor sport and recreation

Policy DP31 Thresholds - developments should contribute to public open space provision where they add 5 or more homes, 10 or more student bedspaces, or 500 sq m floorspace or more

Relevant parts of Westminster's Core Strategy

Policy CS34 – Open space

Relevant parts of the London Plan

Policy 2.18 – Green infrastructure: The network of open and green spaces

Policy 3.6 - Children and young people's play and informal recreation facilities

Policy 3.19 – Sports facilities

Policy 7.5 – Public realm

Policy 7.18 – Protecting local open space and addressing local deficiency

Policy 7.19 – Biodiversity and access to nature



Providing community facilities

Principle 3

The Council will support the development of community facilities throughout Fitzrovia provided the proposal is at an appropriate scale and character for the area in which it is situated.

The Council will expect development to meet any additional need it creates for community facilities by providing new facilities or providing support for existing facilities to serve more users. New facilities should be provided on-site wherever possible.

Camden Development Policies 2010 defines community facilities to include a wide range of activities such as childcare, education and training, healthcare, meeting spaces, places of worship and public conveniences. They will generally be facilities that provide services directly to local residents. As detailed in Part 2 *Character and challenges*, Fitzrovia includes a variety of provision within Camden and Westminster including a community centre, hospitals, GP surgeries, nurseries and a primary school.

The Plan's objectives include providing a range of facilities that support local resident needs. Seven of the Plan's opportunity sites are identified for possible medical and healthcare development, including:

- the Tottenham Mews Day Hospital, which the Camden and Islington NHS Foundation Trust intends to develop for a Community Mental Health Resource Centre;

- several in the area close to University College Hospital that are likely to be developed for further hospital uses.

More details are provided in Principle 6 and Part 6 *Opportunity Sites*.

There are limited opportunities to develop further community facilities in Fitzrovia due to the high value of land and the limited funding available to service providers. Given the mixed-use character of Fitzrovia and the shortage of available sites, the Council will encourage inclusion of space for community facilities in all large-scale developments. Where a development generates a need for an additional community facility, the best prospect of delivery is within the development site. However, Camden Development Policies 2010 also seeks retention of existing community facilities, and the Council will consider the potential for new development to support existing facilities so they can serve more users.



All new development should be at an appropriate scale and character for the area in which it is situated. Many parts of Fitzrovia have a dense urban grain and human scale which will not always be compatible with larger community facilities. Given these constraints, medical and research institutions should also be guided by Principle 6 below, particularly where they are large in scale (generally over 2,500 sq m).

There is not currently any public toilet provision in Fitzrovia, and this contributes to anti-social behaviour, particularly late at night when bars and restaurants close. The need for public toilets is particularly acute towards the southern end of Tottenham Court Road, which is a busy waiting and bus-boarding area for visitors to Fitzrovia and the West End (including night-time visitors to Covent Garden and Soho).

The community is also concerned that local primary school places may not be sufficient to meet future pupil needs. Camden's Central London primaries have spare capacity at present, but the Council will continue to monitor this situation, having regard to population change, fertility rates and new development coming forward.

In supporting community facilities in Camden, the Council will prioritise:

- provision of public toilets (possibly through agreed access to private facilities or temporary urinals);
- ensuring that the community centre and the groups operating there are able to accommodate the demands created by additional development; and
- ensuring that adequate places are available in local primary schools and nurseries.

Relevant Area Action Plan objectives

Contributes to the key objective *supporting the residential community by providing a range of facilities, services and places* through supporting and enhancing community facilities.

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS1 – Distribution of growth

Policy CS10 – Supporting community facilities and services

Policy DP1 - Mixed-use development

Policy DP15 – Community and leisure uses

Relevant parts of Westminster's Core Strategy

Policy CS33 – Social and community infrastructure

Relevant parts of the London Plan

Policy 3.16 – Protection and enhancement of social infrastructure

Policy 3.17 – Health and social care facilities

Policy 3.18 – Education facilities

Small and medium enterprises

Principle 4

The Council will support small and medium enterprises (SMEs) by seeking to ensure that where appropriate:

- existing business premises suitable for SME use are retained;
- new business development is designed flexibly to allow parts of the property to be occupied SMEs.

The Plan's objectives include promoting small and medium scale businesses. Small and medium enterprises (SMEs) are commonly regarded as firms that employ fewer than 250 employees. The multitude of small and medium enterprises are a valued part of the character of Fitzrovia. Firms with fewer than 200 employees provide jobs for around 60% of the people who work in the area, while around three quarters of Fitzrovia-based businesses have 10 or fewer employees (Annual Business Inquiry 2003 - 2008). For such businesses to establish themselves and flourish, the area needs to retain and add to the range of small and medium-sized premises. The Council will particularly seek to maintain a supply of premises that can provide lettings of less than 100 sq m.

Across Bloomsbury in the last five years, schemes involving redevelopment or conversion of business premises for housing have produced significant floorspace losses, and the pipeline of schemes awaiting the start or completion of work indicates that this activity will continue. Conversion of business space for housing has been particularly marked in Fitzrovia. Relatively un-modernised premises are often the most attractive to small business due to their character, low cost and ease of subdivision, but are often the most vulnerable to residential development.

Increases in housing stock in Fitzrovia are welcome, and the Council will be flexible in its consideration of residential proposals, particularly in the case of vacant premises originally designed as housing. However, we will seek to ensure that stock of business premises is not reduced in a way that would harm business growth in general, and particularly the birth and growth of SMEs.



Relevant Area Action Plan objectives

Contributes to the key objective *ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses* by promoting small and medium scale businesses

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS1 – Distribution of growth

Policy CS8 – Promoting a successful and inclusive Camden economy

Policy CS9 - Achieving a successful Central London

Policy DP1 - Mixed-use development

Policy DP13 – Employment premises and sites

Relevant parts of Westminster's Core Strategy

Policy CS19 – Offices and other B1 floorspace

Relevant parts of the London Plan

Policy 4.1 – Developing London's economy

Policy 4.2 – Offices



Retail provision

Fitzrovia contains a wide range of shops, cafes and other retail premises. Some are concentrated on shopping streets or parades, but there are also small retail groups and individual shops scattered across the area. Camden's *Planning Guidance for Central London* describes the retail character and function of shopping provision in Fitzrovia and nearby parts of the borough, and gives specific guidance on how we will consider proposals that involve food, drink and entertainment and specialist and retail uses. The Council expects to publish an updated version of the guidance in 2013.

The following paragraphs of this Plan provide a brief overview of the shopping areas and streets in Fitzrovia. Camden's Core Strategy and Development Policies 2010 guide the distribution of new retail floorspace and seek to promote and protect independent shops at a borough-wide level. Broad principles are included here to indicate how these policies will be interpreted within Fitzrovia. Planning Guidance for Central London gives more detailed guidance for individual frontages to help maintain their shopping character and minimise the negative impact of food, drink and entertainment uses.

Designated shopping areas and streets in the Plan's area are set out below:

Tottenham Court Road/ Charing Cross Road Central London Frontage

Tottenham Court Road operates as an extension to the West End and is well-known for its concentration of furniture and electrical goods. The frontage is designated in Camden's Core Strategy, which also describes its character and function and the Council's specific planning objectives for it. Within Fitzrovia the frontage includes almost all of Tottenham Court Road and part of the north side of New Oxford Street.





Store Street, Goodge Street and Cleveland Street Neighbourhood Centres

Camden's Core Strategy designates neighbourhood centres and generally characterises them as catering for the day-to-day shopping needs of the local population, however neighbourhood centres in the Plan area have a more distinctive role. Store Street provides primarily specialist uses geared to West End shoppers and Bloomsbury visitors, while Goodge Street has a supermarket, food and drink uses, and specialist and independent shops. The east side of Cleveland Street is characterised by a number of small independent restaurants. The west side of Cleveland Street is designated as a local shopping centre in Westminster's Core Strategy.

Other parades, groups and individual shops

Camden's *Planning Guidance for Central London* identifies two other types of shopping provision that are characteristic of Fitzrovia. Specialist shops such as art dealers and bookshops can be found throughout the Plan area, but are focussed particularly on Percy Street, Warren Street and Windmill Street (as well as in the neighbourhood centres). In the southern part of Charlotte Street there is a concentration of food and drink uses aimed at West End visitors and the Central London workforce, although food and drink uses are present throughout Fitzrovia (including particularly Cleveland Street Neighbourhood Centre).



Principle 5

The Council will guide development of large A1 shops to the Central London Frontage on Tottenham Court Road and New Oxford Street.

The Council will seek to support independent and specialist shops as an element of Fitzrovia's character and function, and will resist the loss of A1 shops and floorspace that would harm the area's mixed-use character and vitality.

The Council will guide development of food, drink and entertainment uses to the Central London Frontage on Tottenham Court Road and New Oxford Street, except those the Council considers to be small scale and low impact.

Camden's Core Strategy indicates that we will protect and enhance the role and unique character of Camden's shopping areas and ensure new development is at an appropriate scale and character for the area in which it is situated. Existing provision for larger and medium-sized retailers in Fitzrovia is in the Central London Frontage on Tottenham Court Road and New Oxford Street, and development of larger shops (generally over 100 sq m) can most appropriately be located in the Central London Frontage. In the remainder of Fitzrovia (including the Neighbourhood Centres) most retail units are small in scale (typically not more than 100 sq m).

The Plan's objectives include providing a range of services that support local resident needs and guiding commercial uses to the most appropriate locations. Five of the Plan's opportunity sites include part of the Central London Frontage on Tottenham Court Road and have potential to provide for A1 shops.

Independent and specialist shops

The Plan's objectives also include promoting independent and specialist shops. Specialist and independent retailers are a valued part of Fitzrovia's character which complements and enhances the West End's retail function. The loss of these traders from Fitzrovia would diminish the area's character and vitality.



Specialist and independent traders commonly rely on the availability of premises away from the main shopping streets (particularly shops that are on their own or in small groups) where rents are relatively low. These premises are in danger of being displaced by higher value retail and non-retail uses. The high value of housing in Fitzrovia has prompted the conversion of many commercial premises for housing, and the more isolated shops are particularly vulnerable.

The Council will therefore seek to retain existing retail units and maintain the overall stock of retail premises (whether or not they are occupied by a specialist shop). The Council will also promote the provision of new premises suitable for specialist and independent shops in appropriate locations. In accordance with policy DP10 of Camden's Development Policies 2010, the Council will expect the provision of small shop units as part of large retail developments.

Food, drink and entertainment uses

Food, drink and entertainment uses refer to cafes, restaurants, bars, pubs, clubs and performance venues. In appropriate locations these uses contribute to the mixed use character of Fitzrovia, to the vitality and viability of the area's retailing, and to street activity in the evenings and at weekends.

One of the Plan's objectives is to manage the area's night time economy in a way that safeguards the amenity of local residents. Fitzrovia faces particular risks from the expansion of food, drink and entertainment uses (particularly in areas of concentration such as the southern end of Charlotte Street and the Cleveland Street Neighbourhood Centre) through:

- individual and cumulative harm to residential amenity (also see Principle 9), particularly in the context of the fine urban grain and intricate mix of uses in the area; and
- displacement of independent and specialist shops and retailers serving long-term local residents.

There is considerable pressure in Fitzrovia for the creation of new food, drink and entertainment uses and extension of existing premises, associated with:

- the emergence of Charlotte Street and the surrounding area as a destination for food, drink and entertainment with a London-wide reputation;



- growth in the reputation of Fitzrovia as an attractive location for visits to coffee shops and sandwich bars;
- the growth of chains of coffee shops and sandwich bars, many of which have opened branches in Tottenham Court Road;
- the anticipated increase in visitor numbers associated with developments at Tottenham Court Road and Euston stations; and
- the impact of restrictive licensing policies for adjacent areas in Soho and Covent Garden (through Westminster City Council's designation of a West End Stress Area and Camden Council's designation of a Seven Dials Special Policy Area).

Proposals for food, drink and entertainment development anywhere in Fitzrovia will need to be considered under the full range of criteria in the Council's Development Policies, including cumulative impact on residential amenity (see Principle 9). Given the existing concentrations of food, drink and entertainment uses and the high residential density the potential for further development of this type in the Plan area is relatively limited. However, the Central London Frontage on Tottenham Court

Road and New Oxford Street is considered to offer some potential for new food, drink and entertainment uses, subject to compliance with all relevant development plan policy criteria and Principle 9 of this Plan. This frontage has direct access to the tube, bus and night bus networks and many parts remain predominantly in A1 shop use. Although there are concentrations of housing above the frontage, particularly at the northern end of Tottenham Court Road, large parts of the frontage are occupied by commercial premises with non-residential uses above.

In many cases new premises will also require a licence under the Licensing Act 2003 (e.g. for sale of alcohol, for sale of hot food and drink after 23.00 hours and for provision of many entertainments). In August 2012, there were 159 licensed premises in Camden's part of Fitzrovia, over 40% of which were restaurants. Less than 20% of all licensed premises in Camden's part of Fitzrovia are licensed for the sale of alcohol after midnight.

Licensing decisions are guided by public safety, the protection of children and the prevention of public nuisance, crime and disorder. Licensing cannot be guided by planning policy, but planning policy and decisions can reflect the consequences of licensing decisions and the evidence that informs them.

Camden and Westminster both operate restrictive licensing policies that severely limit the creation of additional licensed premises in areas immediately adjoining the Plan area. The boundary of Camden's Seven Dials Special Policy Area runs along the Plan boundary at New Oxford Street and Bloomsbury Street. The boundary of Westminster's West End Stress Area runs along the Plan boundary at Tottenham Court Road, Hanway Place and Gresse Street. In the Stress Area, Westminster's Core Strategy limits new food, drink and entertainment uses to those considered to be small scale and low impact. Camden Council will continue to monitor the impact of these policies, and consider

whether there is a need for a more restrictive approach to licensing or planning within the Plan area.



When making planning decisions, the Council will have regard to all relevant development plan policy criteria, Principle 9 of this Plan, and the detailed guidance provided by Camden Planning Guidance CPG5 Town Centres, Retail and Employment. We will also take account of the impact of the Seven Dials Special Policy Area and the West End Stress Area, particularly in connection with proposals for locations close to their boundaries, such as New Oxford Street and Charlotte Street.

Relevant Area Action Plan objectives

Contributes to the key objectives *ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and supporting the residential community by providing a range of facilities, services and places* through guiding commercial uses to the most appropriate locations and promoting independent and specialist shops.

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS1 – Distribution of growth

Policy CS5 – Managing the impact of growth and development

Policy CS7 – Promoting Camden's town centres and shops

Policy CS9 - Achieving a successful Central London

Policy CS17 - Making Camden a safer place

Policy DP1 - Mixed-use development

Policy DP10 – Helping and promoting small and independent shops

Policy DP12 – Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses

Relevant parts of Westminster's Core Strategy

Policy CS5 – Tottenham Court Road Opportunity Area

Policy CS6 – Core Central Activities Zone

Policy CS7 – West End Special Retail Policy Area

Policy CS20 – Retail

Policy CS23 – Entertainment uses

Relevant parts of the London Plan

Policy 2.10 – CAZ strategic priorities

Policy 2.11 – CAZ strategic functions

Other relevant policies

Camden's Statement of Licensing Policy 2011

Westminster's Statement of Licensing Policy 2011

Educational, medical and research institutions

Principle 6

Large scale institutional uses should be located and designed to contribute to meeting the Plan's objectives and comply with relevant development plan policies. In particular they should maintain the mixed-use character of the area, support the residential community and its facilities and protect and enhance residential amenity and quality of life.

Subject to relevant development plan policies, the Council will guide development of large scale institutions as follows:

- medical and healthcare uses to the vicinity of the University College Hospital building in Euston Road and to Opportunity Sites identified for medical or healthcare use;
- education and research uses to the area east of Tottenham Court Road and to the Howland Street Character Area.

Fitzrovia and Bloomsbury have a history of medical and educational uses stretching back 200 years. The University of London and University College London (UCL) are based in Bloomsbury just to the east of Fitzrovia. The main University College Hospital building (part of the UCLH NHS Foundation Trust) is in the north-east of Fitzrovia on Euston Road. Together, these form part of a campus of educational, medical and research facilities which is partly in the Plan area. The London Plan recognises the whole area east of Tottenham Court Road (and across the Plan boundary to Woburn Place) as a mixed use area with a strong academic character.

However, institutional properties are not confined to the north-east of Fitzrovia. UCL and the NHS Trust also have properties in other parts of the area including the Sainsbury Wellcome Centre for Neural Circuits and Behaviour being developed at the corner

of Cleveland Street and Howland Street, existing student accommodation in Maple Street and Charlotte Street (see Principle 7 Student Housing) and the vacant Middlesex Hospital Annex in Cleveland Street (formerly the Strand Union Workhouse). Other educational and medical institutions with facilities within or close to the area include the London School of Economics and Political Science (LSE), the University of Westminster and the Camden and Islington NHS Foundation Trust.

Camden's Core Strategy supports the concentration of medical, educational and research institutions within Central London, recognises the services they provide to residents and visitors and acknowledges their contribution to London's national and international role. However, the Core Strategy also indicates that development in Central London should contribute to strong and successful communities and support their facilities and future needs while protecting their amenity and the characteristics of local areas. The Council notes that where institutions already have an extensive presence their expansion can involve the loss of services and land uses needed to support the community and have a harmful impact on the balance and mix of uses in the area. Any development of new and expanded institutions in Fitzrovia will therefore need to be located and designed so that it is sensitive to its surroundings and addresses the concerns set out in the Core Strategy.

This Plan's objectives include providing a range of facilities that support local resident needs and guiding institutional uses to the most appropriate locations. The Plan identifies five vacant and underused properties as Opportunity Sites for possible medical and healthcare development. Four of the sites are close to the main University College Hospital building (within the UCH and University Street Character Area identified in Part 5 of the Plan), including the Rosenheim Building and Royal Ear Hospital, both in Huntley Street. The UCLH NHS Trust owns these sites, and aspires to further focus its activities in this part of Fitzrovia.

Taking into account the large grain and scale in the vicinity of the University College Hospital, and the London Plan's recognition of a broader area with a strong academic character east of Tottenham Court Road, these areas are considered the most appropriate locations for medical/ healthcare uses and educational/ research uses respectively.

The area in the north east of the Plan area provides significant capacity for development of medical and academic facilities, however it is likely that the University College Hospital and the institutions related to University of London will continue to look for opportunities elsewhere in Central London, including Fitzrovia. These highly regarded institutions are also likely to generate opportunities for academic and medical collaboration and attract other medical and research related development.

There is one Opportunity Site to the west of Tottenham Court Road that is identified for possible medical and healthcare development, and which could also provide for a relatively large scale institution. There are also two nearby sites with an established medical/ healthcare use. Taken together with the four Opportunity Sites close to University College Hospital, these are considered to provide sufficient capacity within the Plan area for large scale medical/ healthcare uses.

The Plan's Part 5 *Character areas and urban design principles* designates the area around these western Opportunity Sites as the Howland Street Character Area. Most properties in this area have been developed since the Second World War to a larger scale and grain than other parts of Fitzrovia. The Character Area also includes the Sainsbury Wellcome Centre. Given the nature of the area and the clustering of existing and proposed institutions, the Howland Street Character Area is considered to be the most appropriate area west of Tottenham Court Road for any additional education and research uses.



For the purposes of Principle 6, large scale development will generally be considered to be development with floorspace of over 2,500 sq m.

Institutional development may be acceptable in other parts of Fitzrovia, but any proposal should be at an appropriate scale and character for the area in which it is situated, and will be assessed having regard to the full range of its impacts and the concerns identified by Camden's Core Strategy, including impact on residential amenity (see Principle 9 below).

Relevant Area Action Plan objectives

Contributes to the key objective *ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses* by supporting residential communities, guiding institutional uses to the most appropriate locations and enhancing the relationship with the area's major institutions

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS5 – Managing the impact of growth and development

Policy CS9 - Achieving a successful Central London

Policy CS10 – Supporting community facilities and services

Relevant parts of Westminster's Core Strategy

Policy CS33 – Social and community infrastructure

Relevant parts of the London Plan

Policy 3.17 – Health and social care facilities

Policy 3.18 – Education facilities

Policy 4.10 – New and emerging economic sectors



Student housing

Principle 7

The Council will guide development of student housing in Fitzrovia to existing student housing sites.

The University of London is based in Bloomsbury just to the east of Fitzrovia, together with 8 of its constituent schools and colleges. There are also a number of higher education institutions nearby in Westminster. The proximity to teaching facilities makes Fitzrovia an attractive location for students to live.

Due to the high cost of local housing in the open market, the vast majority of students living in Fitzrovia occupy dedicated housing designed and built for occupation by students. Dedicated student accommodation is provided in Fitzrovia by UCL, LSE and the Indian YMCA, with its main focus in Maple Street between Fitzroy Street and Whitfield Street. These existing sites have operated for some years without evidence of serious disruption to longer-term residents. Existing sites are shown on the map of Student halls in Fitzrovia.

The Plan's objectives include supporting residential communities and achieving more housing and affordable housing. One of the Plan's Opportunity Sites (Astor College) is an existing student hall of residence which has potential for development to provide improved accommodation and expansion of approximately 1,600 sq m (or around 100 rooms). The Council's preferred use of this site is student housing. There is also potential for modest expansion to other student halls in Fitzrovia.

Camden Development Policies 2010 indicates that student housing schemes creating 10 or more units/ rooms or occupiers are considered to increase the demand for public open space. The Council will seek contributions to public open space from

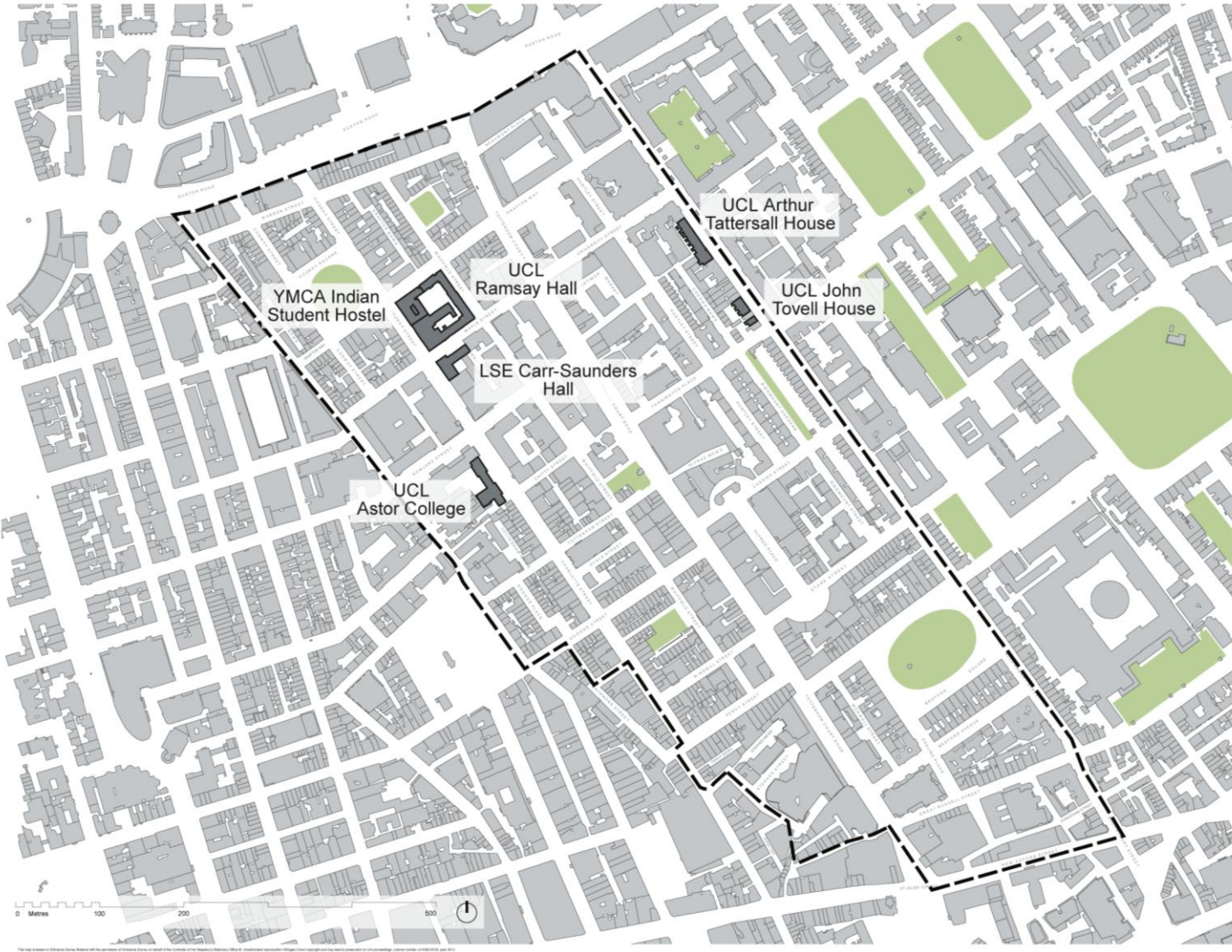
such developments in Fitzrovia, taking into account local public open space deficiencies, the pressure on existing spaces and any alternative facilities available to students.

Individual students are generally residents in the area for a single academic year and their accommodation is generally also let to short-term visitors during summer holidays. These short-term residents are likely to benefit local businesses, but will not necessarily support the shops and services valued by longer-term residents.

In 2001, almost a third of Fitzrovia's population were students. Across the whole Bloomsbury ward, of which Fitzrovia is part, students aged 19 or over made up a quarter of the population, compared with 14.9% across Bloomsbury and 8% across the whole borough. The Council considers that significant growth in the proportion of students in Fitzrovia (beyond the expansion of existing student halls) would be harmful to the mix, balance and inclusiveness of the community.



Student Halls



Relevant Area Action Plan objectives

Contributes to the key objective *ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses* by guiding institutional uses to the most appropriate locations

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS6 – Providing quality homes

Policy CS9 – Achieving a successful Central London

Policy CS10 – Supporting community facilities and services

Policy DP9 – Student housing, bedsits and other housing with shared facilities

Relevant parts of Westminster's Core Strategy

Policy CS15 – Meeting housing needs

Relevant parts of the London Plan

Policy 3.8 - Housing choice



Visitor accommodation



Principle 8

The Council will guide development of large scale visitor accommodation to the Tottenham Court Road and Euston Growth Areas and the Central London Frontage on Tottenham Court Road and New Oxford Street.

There are hotels and other visitor accommodation throughout Fitzrovia, including concentrations around the southern ends of Tottenham Court Road at Great Russell Street and Gower Street/ Bloomsbury Street. There are also concentrations of student accommodation which are often let to short-term visitors during summer holidays. As noted in the paragraphs supporting Principle 7, students make up around a third of the Fitzrovia population, combining with visitors to create a substantial proportion of residents who only stay in Fitzrovia short-term. These short-term residents are likely to benefit local businesses, but will not necessarily support the shops and services valued by longer-term residents.

Camden Core Strategy 2010-2025 and Camden Development Policies 2010 recognise the importance of the visitor economy in Camden, support proposals for additional visitor accommodation, and guide large scale visitor accommodation to Central London, particularly its Growth Areas. However, our policies also indicate that development in Central London should protect the characteristics of local areas and communities and contribute to strong and successful communities by protecting residential amenity and supporting community facilities. Camden Development Policies 2010 sets out particular requirements that visitor accommodation should provide appropriate access arrangements and should not involve the loss of services and land uses needed to support the community or have a harmful impact on the balance and mix of uses in the area. Any development of visitor accommodation in Fitzrovia will therefore

need to be located and designed so that it addresses these concerns. Access arrangements will be particularly important, and the Plan considers them in more detail at the end of this section.

This Plan's objectives include guiding commercial uses to the most appropriate locations. The Tottenham Court Road and Euston Growth Areas and the Central London Frontage on Tottenham Court Road and New Oxford Street represent the best opportunities to provide visitor accommodation without harm to residential communities or the balance of uses in the area. Tottenham Court Road and Euston Growth Areas will provide direct access to long-distance public transport services. All three areas also provide easy access to shops and services for visitors in the form of the West End's international shopping offer and cluster of night-time activities, Tottenham Court Road's specialist shops and High Street multiples, and the planned provision for retail growth at Euston.

For the purposes of Principle 8, large scale development will generally be considered to be development with floorspace of over 2,500 sq m.

Development of visitor accommodation may be acceptable in other parts of Fitzrovia, but any proposal should be at an appropriate scale and character for the area in which it is situated, and will be assessed having regard to the full range of its impacts and the concerns identified by Camden's Core Strategy and Development Policies, including impact on residential amenity (see Principle 9 below).

The residential density and fine grained character of many parts of Fitzrovia, including areas to the rear of the Central London Frontage, makes them vulnerable to harm from access arrangements, particularly access by taxis and coaches. Facilities for servicing and pick up should be sited and designed to minimise any adverse impacts. Given the high public transport

accessibility of the area and the severe limitations on providing on-site pick up and set down, the Council will expect visitor accommodation to be accessed primarily by public transport and will seek to use planning conditions and/ or legal agreements to secure transport management plans. The Council will expect transport management plans to control pick-up and set-down by taxis and coaches.

Relevant Area Action Plan objectives

Contributes to the key objective *ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses* by supporting residential communities and guiding commercial uses to the most appropriate locations

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS5 – Managing the impact of growth and development

Policy CS9 - Achieving a successful Central London

Policy DP14 – Tourism development and visitor accommodation

Relevant parts of Westminster's Core Strategy

Policy CS22 – Hotels and conference facilities

Relevant parts of the London Plan

Policy 4.5 – London's visitor infrastructure

Parking Addendum to Chapter 6 – paragraphs 6A.8 and 6A.9

Residential amenity

Principle 9

The Council will have regard to the particular impacts on residential amenity that arise from the dense mix of land uses in Fitzrovia, and will seek:

- a good standard of amenity for all existing and future occupants of land and buildings; and
- to prevent cumulative harm to residential amenity from noise, mechanical ventilation, light pollution, deliveries and waste collection.

The Plan's objectives include supporting residential communities by protecting residential amenity. Homes are scattered throughout Fitzrovia in the form of houses fronting the street, flats and above shops and other commercial premises, apartment blocks and mansion blocks. The Council seeks to protect the amenity of those living in all types of homes and in mixed use areas as well as in predominantly residential areas.

There are food, drink and entertainment uses located beneath and adjacent to homes in a number of Fitzrovia streets, notably Charlotte Street, Cleveland Street and Goodge Street. These uses can cause harm to residential amenity by generating noise, anti-social behaviour, litter and cooking odours.

There are a number of interfaces in Fitzrovia between residential concentrations and large institutions and office blocks, for example in Huntley Street, Grafton Way, Fitzroy Street and Maple Street. Offices and educational, medical and research institutions can cause disturbance to residents through servicing, mechanical ventilation and lighting, particularly where these activities take place 24 hours a day or when ambient noise levels are low.

If a development involves installation of plant, ventilation or air conditioning/ extraction equipment, or will otherwise create significant noise, we will expect submission of a detailed acoustic and noise/ vibration report, as set out in Camden Planning Guidance CPG6 *Amenity*. We will not grant permission for plant, ventilation equipment or other activities that exceed the noise and vibration thresholds set out in Camden's development plan policies.



Residential addresses and flats per address



Relevant Area Action Plan objectives

Contributes to the key objectives *ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and supporting the residential community by providing a range of facilities, services and places and protecting and enhancing residential amenity and quality of life*

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS5 – Managing the impact of growth and development

Policy DP26 – Managing the impact of development on occupiers and neighbours

Policy DP28 – Noise and vibration

Relevant parts of Westminster's Core Strategy

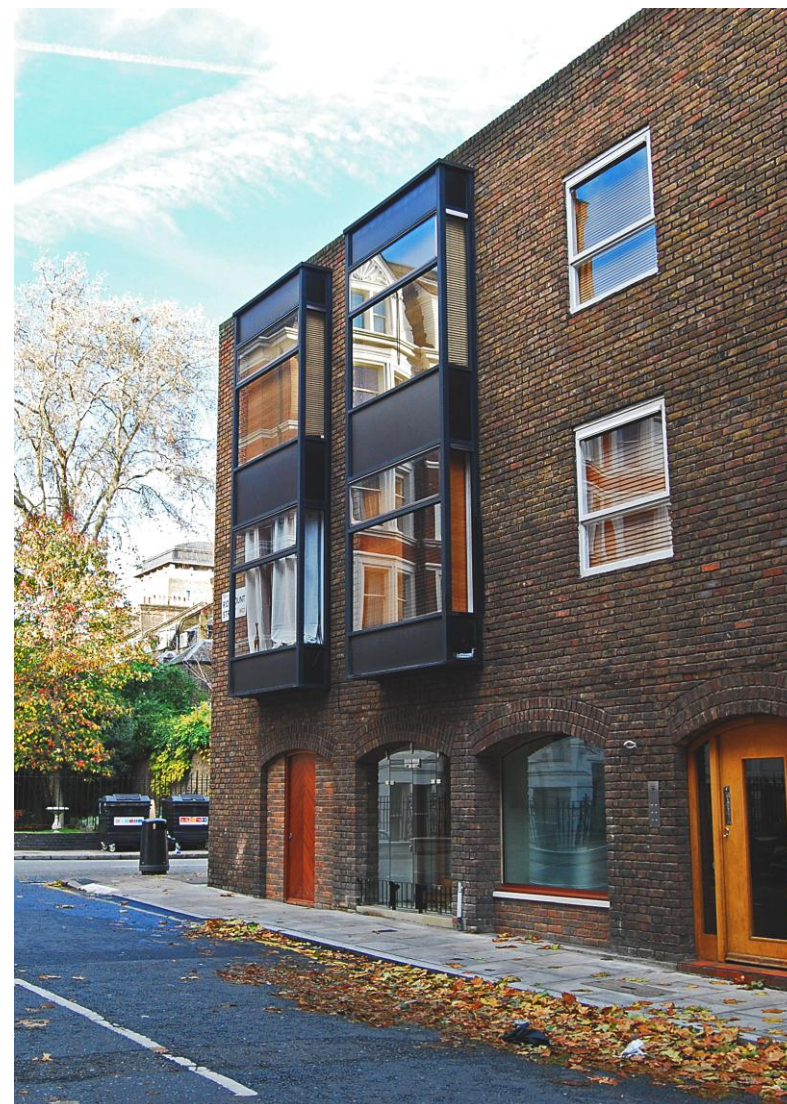
Policy CS18 – Health, safety and well-being

Relevant parts of the London Plan

Policy 2.12 – Central activities zone – predominantly local activities

Policy 3.2 – Improving health and addressing health inequalities

Policy 7.1 – Building London's neighbourhoods and communities



Sustainability and local energy networks

Principle 10

The Council will expect all development in Fitzrovia to incorporate appropriate measures to make the area more sustainable and tackle climate change, and will promote local energy generation and networks in the area.

When considering proposals for developments with high heating demands or a mix of energy demands throughout the day, the Council will expect proposals to include an assessment of the potential to connect to a local energy network, and to provide for a connection wherever feasible and viable.

Where a connection cannot be made at the time of development, the Council will expect provision to be made for a future connection, and will seek a contribution towards the development of future local energy networks.

Securing an environmentally sustainable future is a key objective of this Plan. Sustainably managing growth is also a key objective of Camden's Core Strategy. The Core Strategy sets out how the Council tackles climate change through promoting higher environmental standards. It encourages all developments to meet the highest feasible environmental standards that are financially viable and requires all developments to take measures to minimise the effects of, and adapt to, climate change (policy CS13) including managing surface water run-off within all developments. It also promotes sustainable travel (policy CS11), flood prevention measures (policy CS13) and reducing air pollution (policy CS16). All developments in Fitzrovia will be assessed against the sustainability policies and guidance in the Core Strategy, Camden Development Policies 2010 and Camden Planning Guidance 3: Sustainability.

Surface Water Flooding

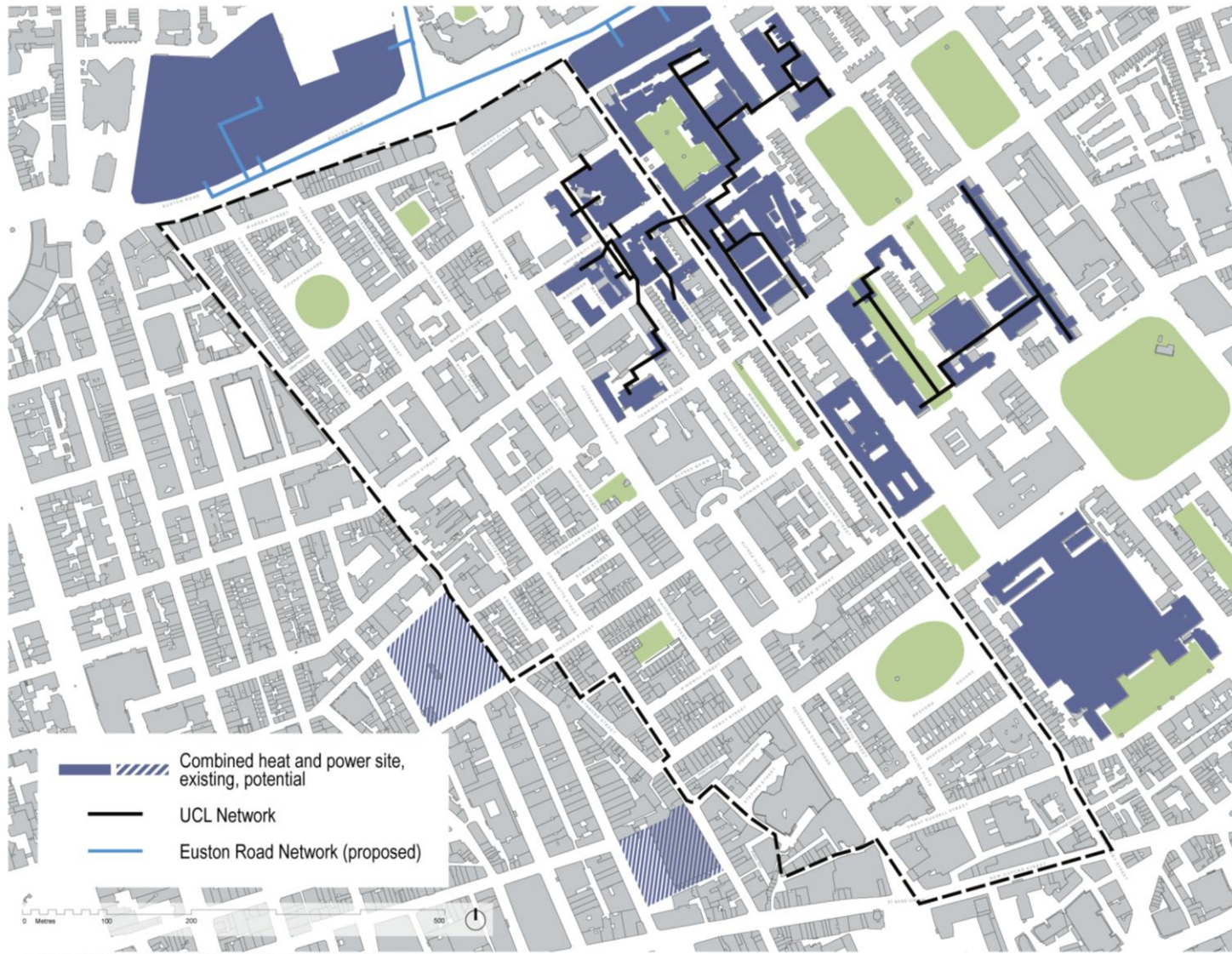
The key flood risk to Camden is from surface water flooding. Camden has produced detailed modelling of the surface water flood risk in the borough. In extreme rainfall events (1 in 75+) there is some ponding in Fitzrovia but less than in other parts of the borough. The Surface Water Management Plan identified the area as being part of a Critical Drainage Area Group (ref 3_005) where flood risk could arise, but neither the Surface Water Management Plan nor the Camden Flood Risk Management Strategy consider it an area of significant risk. The City of Westminster have also not identified the neighbouring area among its hotspots for further investigation. Nevertheless, it is vital that new developments are safe from flood risk and do not increase flood risk elsewhere. Developments should aim to decrease the amount of impervious surfacing on site and manage surface water run-off through the incorporation of sustainable urban drainage systems (SUDS) across the site.

The energy hierarchy

A key aspect of sustainability is the reduction of carbon emissions. The energy hierarchy is a tool for reducing carbon emissions by prioritising firstly a reduction in energy use, secondly efficient forms of energy supply, and thirdly the use of renewable energy.



Local energy networks



Reducing energy use

Across Camden, developments are expected to be designed to minimise energy needs and use during construction and occupation. New buildings should take advantage of natural opportunities for daylight, warmth, ventilation and cooling, to use layouts, materials and insulation that minimise energy loss, and to use efficient mechanical systems (e.g. for heating and air conditioning). We consider the energy performance of developments using sustainability assessments (Code for Sustainable Homes and BREEAM). The Council will seek to ensure that new buildings in Fitzrovia are designed to maximise the energy credits achieved in sustainability assessments and comply with Camden Planning Guidance 3: Sustainability.

Almost 80% of Camden's carbon emissions derive from existing buildings. To reduce emissions from existing buildings the Council promotes the retrofitting of energy efficiency measures (e.g. draft-proofing, thermally efficient windows and insulation). Retrofitting represents the best opportunity to reduce carbon emissions in Fitzrovia given that a high proportion of Fitzrovia's buildings are over 100 years old and are valued heritage assets. However, retrofitting will also be a challenge for the many Fitzrovia buildings protected by Listed Building or conservation area status.

The Council will expect development in Fitzrovia involving existing buildings (such as changes of use and extensions) to include measures to reduce emissions, and will seek to secure appropriate retrofitting measures wherever refurbishment is proposed. Camden Planning Guidance sets out circumstances where sustainability assessments are expected for conversions, and provides a checklist of retrofitting measures and advice on dealing with Listed Buildings and other historic properties.

Efficient energy supply

Local energy systems, where heat and power are generated near to the place they are used, have been found to be the most cost effective way for Camden to reduce carbon use. There are particular opportunities in Fitzrovia for developments to supply energy efficiently by using a local ('decentralised') energy system. Local energy networks (or decentralised energy systems) commonly take the form of a CHP (combined heat and power) system driven by a local boiler and generator. Developments are generally suitable for decentralised energy and CHP systems if they have high heating demands or have a mix of energy demands throughout the day (heat and electricity).

There is one existing CHP system in the Fitzrovia area, focused on Gower Street and operated by UCL. Where development is proposed east of Tottenham Court Road and has energy demands that make it suitable for connection to a local energy network, the Council will expect developers to seek connection to the Gower Street network.

The Council is actively promoting a decentralised energy network along Euston Road. Work on the network is expected to start from Somers Town, but has potential to continue to the Euston Growth Area and Euston Tower/ Regent's Place in the longer term. In conjunction with Westminster Council, Camden is also exploring the potential for development of a decentralised energy network focused on the Tottenham Court Road Growth Area.

Where development suitable for connection to a local energy network is proposed west of Tottenham Court Road the Council will expect developers to investigate the status of these proposed networks and ensure that there is potential for a connection in future.

The Council has specific requirements for controlling air pollution associated with CHP. These are summarised below under the heading *Air quality*.

Renewable energy

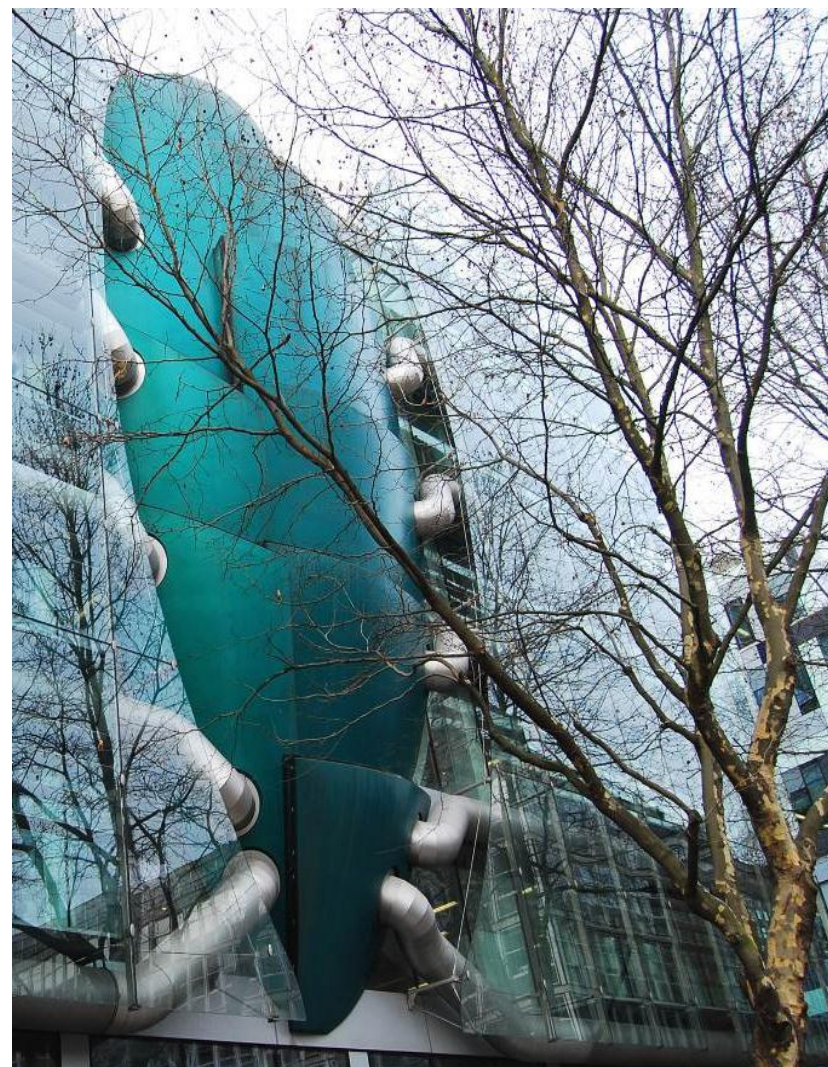
Development should be designed with a target of 20% for the reduction of carbon emissions by using on-site renewable energy. Renewable technologies that may be appropriate in Fitzrovia include solar hot water panels, photovoltaic cells, ground source heat pumps and air source heat pumps. Detailed advice is available in Camden Planning Guidance.

Air quality

Protecting local air quality has a vital role to play in safeguarding public health and the environment, as well as enhancing quality of life. The Council is committed to improving air quality in the borough as outlined in Camden's Air Quality Action Plan 2012 – 2015. Since 2000, the whole of the borough has been designated an Air Quality Management Area (AQMA) for failing to achieve the Government's Air Quality limit values for nitrogen dioxide (NO₂).

Air quality impacts are influenced by the size and location of developments. The Council will require air quality assessments where development could potentially cause significant harm to air quality. Please refer to Camden Development Policies 2010 (policy DP32) and section 2 in Camden Planning Guidance 6: Amenity for further details. All developers will also be expected to follow the Mayor of London's Best Practice Guidance on the control of dust and emissions from construction and demolition.

The Council has specific requirements for controlling air pollution associated with biomass boilers and CHP. If a development is due to include a biomass boiler or CHP plant, guidance should be sought from the Council's Air Quality Officer. Given that biomass releases higher levels of some pollutants than gas-fired systems and the existing poor air quality in the borough, the use of biomass is the Council's least preferred option for the provision of renewable energy.



The Mayor of London is developing a definition and guidance for air quality neutral development. Due to the concentrations of air pollution in the Fitzrovia area, it is likely that air quality neutral developments will be favoured in future.

Relevant Area Action Plan objectives

Contributes to the key objective *ensuring an environmentally sustainable future*

Relevant parts of Camden's Core Strategy and Development Policies

Policy CS13 – Tackling climate change

Policy DP22 – Promoting sustainable design and construction

Policy DP23 – Water

Policy DP27 – Basements and lightwells

Policy DP32 – Air quality and Camden's clear zone

Relevant parts of Westminster's Core Strategy

Policy CS38 – Decentralised energy networks

Relevant parts of the London Plan

Policy 5.1 – Climate change mitigation

Policy 5.2 – Minimising carbon dioxide emissions

Policy 5.5 – Decentralised energy networks

Policy 5.6 – Decentralised energy in development proposals

Policy 7.14 – Improving air quality



