

Camden Development Policies 2010-2025

Local Development Framework



**If you would like this document in large print
or Braille, or in another language, please
contact 020 7974 5615**

Find out more about this document and the LDF by visiting camden.gov.uk/ldf
or by calling the LDF hotline 020 7974 5615/2043.

Forward Planning
London Borough of Camden
Town Hall Extension
Argyle Street
London WC1H 8EQ

Published November 2010.

Camden's Local Development Framework. Development Policies.



Section 2

Meeting Camden's needs

– Providing homes, jobs and facilities

- 2.1 The section on Meeting Camden's needs in Camden's Core Strategy provides our overall approach to making sure we provide the homes, jobs, facilities and infrastructure needed to support the growth in the number of people living in, working in and visiting the borough. This section of Camden Development Policies sets out our detailed planning policies to help to implement this part of the Core Strategy. It is divided into three parts:
- **Meeting our need for homes** – this provides policies that seek to maximise overall housing supply, provide affordable housing and prevent the loss of housing. It also covers providing homes of different sizes; lifetime and wheelchair homes; sheltered housing and care homes for older people; accommodation for homeless people and vulnerable people; hostels and other housing with shared facilities.
 - **Providing jobs and facilities** – this contains our policies on small and independent shops, markets, managing the impact of town centre uses, employment sites and premises, tourism and visitor accommodation, and community and leisure uses.
 - **Promoting sustainable and efficient transport** – this sets out our detailed policies on transport, in particular on the transport implications of development; walking, cycling and public transport; parking; the movement of goods; and development that connects to the highway network.



Meeting our need for homes

- 2.2 The Core Strategy seeks to manage growth so that it works positively for Camden. Core Strategy policy CS6 – *Providing quality homes* aims to:
- make full use of Camden’s capacity for housing, to meet or exceed targets for the supply of homes in the borough;
 - secure high quality affordable housing, by seeking an appropriate proportion of, and different types of, affordable homes; regenerating Camden’s housing estates; and bringing existing Council homes up to Decent Homes standard;
 - minimise social polarisation and secure mixed and inclusive communities, by securing a broad range of housing of different sizes and types to meet the needs of different groups and households in different circumstances.
- 2.3 This sub-section of Camden Development Policies sets out in more detail how we will make planning decisions to deliver the aims of policy CS6. However, housing schemes will also need to satisfy other relevant policies, particularly those concerned with the environment, quality of life, sustainability, climate change and transport. These policy concerns correspond well with the Building for Life criteria that form the national standard for well-designed homes and neighbourhoods.
- 2.4 Amenity, in terms of a house’s relationship with neighbouring properties and its internal space standards, is key aspect of housing quality. The Council will protect the amenity of Camden’s residents by making sure that the impact of developments on their occupiers and neighbours is fully considered, in accordance with development policy DP26 and Core Strategy policy CS5. Further information regarding factors that affect residential amenity is included in our Camden Planning Guidance supplementary planning document. In particular, Camden Planning Guidance contains our internal space standards for residential development. To provide high quality housing, proposals will need to address all aspects of residential amenity in accordance with relevant policies and Camden Planning Guidance.
- 2.5 The policies in this sub-section relate to the same forms of housing as Core Strategy policy CS6, namely:
- self-contained houses and flats (Use Class C3) (the predominant form);
 - live/work units, which are self-contained homes that include a dedicated work area (they are outside any planning use class, but we will treat them in the same way as Use Class C3 for the operation of our Local Development Framework policies);
 - bedsit rooms that share facilities such as toilets, bathrooms and kitchens (often known as houses in multiple occupation or HMOs, some with 3 to 6 occupiers fall within Use Class C4, but most are outside any planning use class);
 - hostels where shared accommodation is managed for a particular group of people (e.g. students) and occupiers may stay for several months (also outside any planning use class);
 - those nursing homes, care homes and parts of hospitals where people live permanently, such as nurses’ accommodation (parts of Use Class C2);
 - residential accommodation that is ancillary to another use, such as living areas for managers, caretakers and other staff.

DP2. Making full use of Camden's capacity for housing

- 2.6 Core Strategy policy CS6 indicates that the Council seeks to maximise the supply of homes and minimise their loss, with housing regarded as the priority land-use of the Camden Local Development Framework. Key aspects of policy CS6 that inform our approach to maximising housing supply and minimising loss of homes in the case of an individual site include:
- the overall Camden target for supply of additional homes from 2010/11 to 2024/25;
 - the separate elements of the target for self-contained homes, homes that are not self-contained (such as hostels and grouped bedsit rooms) and vacant homes returning to use;
 - the overall expected delivery of additional homes based on Camden's 15-year housing trajectory, which is significantly above the housing target for 2010/11 to 2024/25, but falls significantly short of the projected household growth rate up to 2026; and
 - the Council's aim to give priority to households unable to access market housing and to vulnerable people in planning decisions relating to new homes.
- 2.7 Policy DP2 protects housing against development for a non-residential use. It relates to all forms of housing for long-term residents (see paragraph 2.5). The first part of the policy is concerned with making the best use of sites for additional homes, particularly homes for people who are unable to access general needs market housing. This part relates primarily to self-contained houses and flats (Use Class C3). The second part is concerned with the loss of housing floorspace in all forms; proposals to change permanent housing into short-stay accommodation; and with the loss of self-contained homes through proposals to combine them into larger dwellings. More detailed guidance is given in policies DP7, DP8 and DP9 with respect to the loss of sheltered housing and care homes for older people; loss of housing for vulnerable people and homeless people; and loss of student housing, bedsits, and other housing with shared facilities. Through policy DP4, the Council seeks to protect existing affordable housing, whether or not it is self contained.



DP POLICY

DP2 – Making full use of Camden’s capacity for housing

The Council will seek to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing, by:

- a) expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site;
- b) resisting alternative development of sites considered particularly suitable for housing; and
- c) resisting alternative development of sites or parts of sites considered particularly suitable for affordable housing, homes for older people or homes for vulnerable people.

The Council will seek to minimise the loss of housing in the borough by:

- d) protecting residential uses from development that would involve a net loss of residential floorspace, including any residential floorspace provided:
 - within hostels or other housing with shared facilities; or
 - as an ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use.

- e) protecting permanent housing from conversion to short-stay accommodation intended for occupation for periods of less than 90 days;
- f) resisting developments that would involve the net loss of two or more homes, unless they:
 - create large homes in a part of the borough with a relatively low proportion of large dwellings,
 - enable sub-standard units to be enlarged to meet residential space standards, or
 - enable existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed.

As an exception to the general protection of residential floorspace, where no alternative site is available, the Council will favourably consider development that necessitates a limited loss of residential floorspace in order to provide small-scale healthcare practices meeting local needs.





Maximising the supply of additional homes

- 2.8 Housing is regarded as the priority land-use of the Local Development Framework, and the Council will make housing its top priority when considering the future of unused and underused land and buildings (see Core Strategy policy CS6). However, this priority does not override, but will be considered alongside, the need to protect some non-residential uses; to promote the national and international roles of Central London; and the need for development to respect the characteristics of the area and the site or property. Taking these considerations into account, a mix of uses or an alternative use will be appropriate for some sites. Where a mixed-use scheme including housing would be appropriate, the Council will seek to maximise the contribution to the supply of housing within the mix, taking into account policy DP1 and the criteria set out in paragraph 2.12.
- 2.9 High development densities are one way of making the maximum use of a site (in the context of housing, this means more homes or rooms in a given area). In accordance with policy CS1 of the Camden Core Strategy, the Council will expect the density of housing development to take account of the density matrix in the London Plan (Table 3A.2), and to be towards the higher end of the appropriate density range. However, the appropriate density will also depend on accessibility, the character and built form of the surroundings, and protecting the amenity of occupiers and neighbours. Given that the majority of the borough has relatively high public transport accessibility and is suitable for development of flats, densities should generally fall within the cells towards the right and bottom of the matrix, i.e. 45 to 405 dwellings per hectare.
- 2.10 There is a significant market in Camden for very large homes that have many more rooms than occupiers. The London Plan density matrix assumes that the number of habitable rooms per dwelling will average between 2.7 and 4.6. Developments including dwellings with significantly more habitable rooms may give inconsistent results against the density matrix, showing an appropriate density in terms of habitable rooms, but an inappropriately low density in terms of dwellings. In the interests of mixed and inclusive communities, the Council seeks a range of dwelling sizes, and does not favour concentrations of very large homes. Therefore, when using the London Plan density matrix, the Council will refer primarily to dwelling densities, measured in units per hectare.



- 2.11 Where possible, we have identified underused sites that are suitable for additional housing in our Site Allocations Local Development Framework document, and will resist an alternative use of allocated sites. However, a high proportion of the housing developments that come forward in Camden are not identified in advance because they are small sites, or were in use when sites were assessed for allocation. Given the high proportion of potential housing sites in the borough that cannot be identified in the Sites Allocations document, the Council may also resist non-housing development on other sites that:
- have a valid consent for housing; or
 - are suitable for housing in terms accessibility and amenity, and are free of physical and environmental constraints that would prevent residential use.
- 2.12 In seeking to maximise the proportion of a site used for housing and deciding whether to resist a non-housing development, the Council will take into account:
- the need and potential to re-provide on site existing uses protected by other policies, such as industry, warehousing, community uses and shops;
 - other uses that are needed in the area, particularly in Central London, and the extent to which alternative sites or provision is available;
 - policy DP1, and whether a mixed-use development would be appropriate;
 - whether the supply of additional housing falls short of the overall target of 595 additional homes per year and the target of 437 additional self-contained homes per year; and
 - the financial viability of the proposal and the financial viability of housing development.
- 2.13 The Council will generally treat live/work units in the same way as housing for the operation of development policies. Such premises contribute to the range of homes and the range of business premises in the borough, and the Council will not resist the development of live – work premises on sites that are considered suitable for housing, subject to the inclusion of an appropriate mix of dwelling-sizes and types (in accordance with other policies including DP3, DP5 and DP6). Further information on our approach to live-work premises is provided by policy DP13 and accompanying paragraphs.

Sites particularly suitable for affordable housing and housing for vulnerable people

- 2.14 The capital return and rental income of developments that provides affordable housing, housing for older people or housing for vulnerable people is limited. Therefore there is a danger that other more profitable forms of housing, such as student housing, will take-up potential sites and limit the supply of affordable housing and homes for vulnerable people.
- 2.15 As far as possible, the suitability of housing sites for affordable housing is identified in our Camden Site Allocations Local Development Framework document. However, a high proportion of the affordable housing provided in the borough is on sites that that have not been identified in advance. Where a site has been allocated for affordable housing or a proportion of affordable housing, or has a valid consent for a development including affordable housing, the Council will resist development that fails to include appropriate affordable housing provision. The appropriateness of an affordable

housing contribution will be considered in terms of the criteria set out in policy DP3, including the financial viability of the development. The Council will also resist the loss of any existing affordable housing, as set out in policy DP4.

- 2.16 Most additional housing for older people and vulnerable people is likely to be delivered by independent providers such as registered social landlords or charities. Where a site has been allocated to provide housing for older people or vulnerable people, the Council will resist housing development that fails to include these uses. The Council will also resist the loss of any existing housing for older people or for vulnerable people, as set out in policies DP7 and DP8.

Loss of residential floorspace

- 2.17 As set out in Core Strategy section CS6 and paragraph 2.6 above, the expected delivery of additional homes from 2010/11 to 2024/25 falls significantly short of the projected growth in the number of households up to 2026. Any loss of residential floorspace that could potentially house an individual or household would worsen this shortfall, and will be therefore be resisted by the Council. As noted in paragraph 2.5, housing takes a wide variety of forms capable of providing permanent residential accommodation. Policy DP2 relates to all of these forms, (although more detailed guidance is given in policies DP4, DP7, DP8 and DP9 on loss of affordable housing, sheltered housing and care homes for older people, accommodation for homeless people and vulnerable people, student housing, bedsits and other housing with shared facilities).
- 2.18 In some cases, residential accommodation is ancillary to another use, such as a caretaker's flat at a school, a staff flat above a shop or pub, or a nurses' home at a hospital. Alterations between the proportion of floorspace in the main use and the ancillary use will generally be outside planning control. However, where the development involves changing the main use or separating the housing floorspace from the main use, it will generally be subject to planning control, and we will seek to protect the residential floorspace.
- 2.19 In some circumstances, it may be appropriate for residential floorspace to be re-provided on an alternative site. We will have regard to policy DP1 (mixed-use development) when considering whether housing should be retained on-site or re-provided off-site. For the purposes of policy DP2, the Council will regard losses of residential floorspace as material if they reduce the number of people who can occupy a home or property. For the purposes of applying policy DP2 to hospitals and care homes (within Use Class C2), protection will apply only to the floorspace previously in permanent residential use, including staff housing, dormitories, permanent accommodation for people needing residential care, and any communal or circulation space associated with these. Additional guidance on protection of key-worker affordable housing for healthcare staff is included in Policy DP4.

Conversion to short-stay accommodation

- 2.20 There is a demand for short term and temporary accommodation in the borough, primarily to provide for visitors. This accommodation falls outside the Council's land-use priority for housing, and new demand should be met from appropriate sites in non-residential use, rather than sites used for permanent housing. In London, a switch from permanent housing to properties let for less than 90 days is considered to be a material change of use (under the amended Greater London Council (General Powers) Act 1973). The Council will resist development that changes permanent housing into such accommodation. Proposals to provide short-term accommodation for vulnerable people (such as people at risk from domestic violence) will be assessed in accordance with policy DP8.
- 2.21 Proposals for new short-term and temporary accommodation will be considered taking into account policies that seek to protect existing uses. Where a proposal involves accommodation for short-term visitors to Camden, the Council will take into account policy DP14 relating to tourism development and visitor accommodation.

Net loss of two or more homes

- 2.22 The expected shortfall in the delivery of homes up to 2024/25 is potentially worsened by the loss of dwellings in small schemes for housing conversion and redevelopment. In each of the 5 years

up to 2007/08, planning permission was granted for the loss of more than 80 dwellings in small conversion and redevelopment schemes, which, when implemented, will add to Camden's (net) annual target of 595 additional homes per year. As a result, there is considered to be little scope for the loss of existing homes in the borough, even where this does not involve loss of floorspace. Where development involves the demolition or other loss of homes, the Council will generally expect it to provide a similar or greater number of replacement dwellings, to an equivalent or better standard than the homes removed.

- 2.23 The majority of permissions granted for the loss of homes involved schemes to combine 2 or more homes into a single large dwelling. Within the affordable housing stock, these changes are justified by the severe problems of overcrowding and the high proportion of existing one-bed dwellings. However, there is no comparable mismatch across the borough's market sector, and typical layouts suggest that merger of existing market homes is largely geared to a demand for high value housing rather than the creation of additional bedrooms for large families. Therefore, schemes that would create a loss of more than one residential property will generally be resisted. The Council does not seek to resist schemes combining dwellings that involve the loss of a single home.
- 2.24 The nature of the stock of market housing varies across the borough, and some areas have a much higher proportion of large dwellings than others. A mix of large and small units in an area can help to create more balanced communities (as different size dwellings meet the housing needs of different parts of the community) and increase housing choice. To achieve a more varied mix of housing, the Council will favourably consider proposals that create large homes out of smaller homes in parts of the borough where there is a relatively low proportion of large dwellings (that is, the wards of Bloomsbury, Holborn and Covent Garden, King's Cross, Kilburn, Regent's Park and St Pancras and Somers Town).
- 2.25 Some housing in the borough does not conform to current residential space standards. These are usually homes that were built before the standards were introduced or without the benefit of planning consent. Where existing homes fall substantially below the residential space standards set out in our Camden Planning Guidance supplementary document, the Council may consider proposals involving the loss dwellings in order to meet the standards. We will consider proposals favourably if existing homes are 20% or more below the space standards and the loss of dwellings is no greater than is necessary to meet the standard.
- 2.26 There is a particular shortage of affordable homes for large families in the borough (see Core Strategy section CS6 and policy DP5 below). Opportunities to reduce this shortage and reduce overcrowding could arise by reconfiguring or redeveloping existing housing, especially the stock of Council housing, which contains a disproportionate number of one-bedroom dwellings. The Council will favourably consider proposals that create large affordable housing for families by combining or redeveloping smaller affordable dwellings provided that there is no overall loss of residential floorspace.

Small-scale healthcare practices

- 2.27 Small-scale healthcare practices (such clinics for osteopathy and physiotherapy) may appropriately be provided in residential areas to ensure they are easily accessible to the people that need them, sometimes in association with the homes of the practitioners. The Council may support the loss of residential floorspace to provide these and similar small-scale healthcare facilities provided that the loss will not exceed one dwelling; no alternative non-residential premises are available nearby; and the proposal will meet needs in a local catchment. If there is no longer a need for these healthcare practices, the Council will expect the floorspace to return to residential use.

Key evidence and references

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing

DP5. Homes of different sizes

5.1 Core Strategy policy CS6 seeks to secure mixed and inclusive communities and a range of self-contained homes of different sizes. Our approach is informed by:

- the over-representation of small dwellings among Camden's existing homes;
- existing and projected household sizes in the borough;
- the Council's identified dwelling size priorities;
- the need for a range of homes accessible across the spectrum of incomes; and
- the housing needs of different groups.

Policy DP5 helps to implement this element of policy CS6 by setting out more detail on our approach to providing homes of different sizes.

5.2 Policy DP5 relates primarily to developments of self-contained houses and flats for general needs (Use Class C3). It will be used when assessing new build housing schemes, schemes to reconfigure or subdivide residential properties and to all changes of use to housing (in Use Class C3) from other uses. It will also be used when assessing development that creates self-contained homes from residential accommodation that is ancillary to another use. Policy DP5 will be applied to proposals for bedsits or other permanent housing with shared facilities if the development could be occupied lawfully as self-contained dwellings in Use Class C3 without submission of a further planning application (please see paragraphs 9.2 to 9.3 for more details).

5.3 Policy DP5 does not relate to developments that provide homes exclusively for older people, homeless people, vulnerable people or students (these are covered by policies DP7, DP8 and DP9). In such developments, the appropriateness of the proposed mix of dwelling sizes will be assessed in terms of the needs of the intended occupiers. However, all housing developments should contribute to the creation of mixed and inclusive communities. Therefore, it will often be appropriate for these dedicated housing types to be integrated into larger schemes that include general needs housing.

DP POLICY

DP5 – Homes of different sizes

The Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. We will:

- a) seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table, including conversion of existing residential and non-residential floorspace;
- b) expect a mix of large and small homes in all residential developments.

In considering the mix of dwelling sizes appropriate to a development, the Council will have regard to the different dwelling size priorities for social rented, intermediate affordable and market homes, and will take into account:

- c) the character of the development, the site and the area, including the impact of the mix on child density;
- d) site size, and any constraints on including homes of different sizes; and
- e) the economics and financial viability of the site, including the demand for homes of different sizes.

- 5.4 The Council has identified different dwelling size priorities for social rented housing, intermediate affordable housing and market housing on the basis of the factors noted in paragraph 5.1. These priorities are set out in Core Strategy paragraph 6.39, and also set out in the Dwelling Size Priorities Table below, with dwelling sizes expressed in terms of number of bedrooms. The Council's particular aims for the size of each of these housing types form the final column of the table, and also provide the basis for monitoring policy DP5. When assessing a proposal against policy DP5, the Council will consider small homes to be studio flats, one bedroom and two-bedroom homes (the need for self-contained studio flats has not been assessed separately from the need for 1-bedroom homes). The Council will consider large homes to be homes with 3-bedrooms or more.

Dwelling Size Priorities Table					
	1-bedroom (or studio)	2-bedrooms	3-bedrooms	4-bedrooms or more	Aim
Social rented	lower	medium	high	very high	50% large
Intermediate affordable	medium	high	high	high	10% large
Market	lower	very high	medium	medium	40% 2-bed

- 5.5 The Council acknowledges that there is a need and/ or demand for dwellings of every size shown in the Priorities Table. We expect most developments to include some homes that have not been given a priority level, and some homes that are identified as medium priority. However, the Council has prioritised some sizes as high or very high priority (primarily on the basis of a high level of need relative to supply). We will expect proposals to include some dwellings that meet the very high priorities wherever it is practicable to do so. We will seek to focus provision around the very high and high priority sizes by assessing dwelling mixes against the aims in the Priorities Table. The Council will aim for at least 50% of social rented dwellings and 10% of intermediate affordable dwellings in each scheme to be large homes with 3-bedrooms or more, and for at least 40% of market homes to contain 2-bedrooms (in each case, proportions will be calculated in terms of numbers of dwellings rather than floorspace).
- 5.6 Having regard to criteria (c), (d) and (e) in policy DP5, the Council acknowledges that it will not be appropriate for every development to meet the aims set out in the Priorities Table. However, we consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall, in accordance with criterion (b). Where possible a mix of large and small homes should be included within each category of housing provided (social rented, intermediate affordable and market). This will help ensure that each development provides some dwelling sizes that are high priorities and some that are not. The Council will resist development proposals for self-contained general needs housing that contain only one-bedroom and studio flats.
- 5.7 The Council will be flexible when assessing development against policy DP5, the dwelling size priority table, and the aims set out in paragraph 5.5. The mix of dwelling sizes appropriate in a specific development will be considered taking into account the character of the development, the site and the area. The following paragraphs set out a number of the relevant considerations.

Character of the development, the site and the area, and child density

- 5.8 Where a development involves re-use of an existing building, this may limit the potential to provide a range of dwelling sizes. Issues that can arise include the creation of access via an existing staircase or lift; respect for the integrity of existing structural walls and patterns of windows; changes in floor level; and heritage designations (listed building and conservation area status) that



may restrict alterations. The Council will have regard to these issues, alongside the expectations arising from development size, and other issues considered below.

- 5.9 Where a development is for the conversion of existing homes (including the creation of self-contained homes from residential accommodation that is ancillary to another use), the Council will seek to minimise the loss of dwelling sizes that are given a priority of medium or above in the dwelling size priorities table. In particular, conversions involving affordable housing should retain or re-provide any existing large affordable homes unless the creation of small homes will allow the release of other large affordable homes that are currently under-occupied. Conversion of market housing should also generally retain or re-provide existing 2-bedroom homes and should also include large homes. Conversions that involve the loss of existing homes should also comply with policy DP2.
- 5.10 When considering the proportion of large homes appropriate within a specific development, we will take account of any features that make the development particularly suitable for families with children. We will also take into account the flexibility that larger dwellings create for other types of households, allowing for arrangements such as shared households and adults caring for elderly or infirm relatives. Developments are particularly suitable for children to live in if they have:
- the potential to provide space on site where children can play (open space or private amenity space);
 - dedicated children's play space available nearby;
 - a number of homes with direct access to the street, private amenity space or open space;
 - no direct access to a major road;
 - a limited number of homes served from each internal corridor and each communal staircase or lift;
 - potential to provide a broad range of dwelling sizes in the development appropriate for new families with very young children and established families with older children.
- 5.11 Where some or all of the features listed in paragraph 5.10 are present, the Council will expect provision of a high proportion of large affordable homes, and expect inclusion of social-rented homes with 4-bedrooms or more (subject to policy DP3 on affordable housing). However, there are relatively few opportunities in Camden for housing development that will provide most of these features. Other ground floor uses often prevent direct access to the street, there are many major roads in the borough, and the cost of lifts is too high to share among a small number of homes. However, the Council does not consider that the absence of any or all of these features justifies the omission of large homes from a development. Developments should be arranged to provide access as directly as possible from large homes to the street entrance, external amenity space or open space. To provide for the minority ethnic mix in Camden, a proportion of large homes should have kitchens and food preparation areas that are physically separated from living areas. Please see our Camden Planning Guidance supplementary planning document for further details.

- 5.12 Child density is a measure of the number of children occupying a specific development or area. High child densities tend to arise where there is a high proportion of large affordable homes in a development, especially when these are social rented. In some circumstances, high child densities are associated with problems such as the use of communal areas as informal playgrounds, noise disturbance, graffiti and vandalism. When considering the proportion of large homes appropriate within a particular development, we will have regard to the child density in the surrounding area and the child density likely to arise in the development. We will also take account of the potential to use a management mechanism to control child densities, such as a sensitive lettings policy (these generally prevent all homes being occupied to their maximum capacity when they are first let).
- 5.13 A number of elements of good design are particularly relevant to considering the mix of dwelling sizes appropriate to a specific development proposal. The mix selected should achieve efficient layouts, in terms of the ratio of internal dwelling space to communal circulation space, and in terms of the proportion of the internal dwelling space that is usable. Where schemes include a number of floors, homes should be arranged to minimise noise disturbance, avoiding situations where bathrooms, living rooms and kitchens are directly above or below bedrooms. Homes where all windows face a single direction should also be avoided, especially in the case of large homes.

Development economics, financial viability, and demand

- 5.14 As set out in paragraphs 6.56 and 6.57 under Camden Core Strategy section CS6, the Council intends to be flexible in pursuit of its policy objectives, and will take into account the findings of our monitoring of housing supply in the light of economic circumstances. These paragraphs note specifically that the Council may vary the range of home sizes sought in order to maximise housing delivery.
- 5.15 At some times, and in some parts of the borough, the demand for large market homes may be higher than the demand for small ones, and vice versa. Market homes of some sizes can therefore generate a premium in terms of their value per square metre. The value of affordable housing may also vary depending on its size. Large affordable homes may have a lower value per square metre than small ones if grant from the Homes and Communities Agency or rental payments by the occupiers do not reflect the higher costs of providing them. The Council recognises that the rigid application of dwelling size priorities can prejudice the financial viability of a development in these cases, and will consider the appropriate mix of dwellings having regard to their value and the potential to maximise the proportion of affordable housing on the site.
- 5.16 The Council also recognises market housing and intermediate affordable housing will often be too expensive for many households who need large homes. Average house prices in Camden were well over twice the national average in 2007 (Camden Housing Needs Survey Update 2008). The affordability issues affecting large market and intermediate affordable homes have been considered in setting our dwelling size priorities, but will they will also be taken into account when considering the mix of homes appropriate for individual schemes.





- 5.17 Affordability and funding concerns may sometimes be resolved by adapting the tenure of intermediate or market housing (subject to the limits on Council control over tenure). In the intermediate sector, large homes for shared-ownership may be more appropriate where property values are relatively low, and large homes for rent may be more appropriate where development costs are relatively high. In the market sector, 3-bedroom homes may be accessible to a wider range of households if they are made available to rent. The Council will take account of affordability, funding concerns, and the impact of different tenures when seeking its priority dwelling sizes in particular schemes.
- 5.18 More detailed guidance on the preferred affordable housing mix is contained in our Camden Planning Guidance supplementary planning document. The Council produces residential space standards that indicate the amount of internal space appropriate for dwellings intended to accommodate different numbers of occupiers. These are also set out in Camden Planning Guidance.

Key evidence and references

- Camden Housing Needs Study Update 2008
- Greater London Strategic Housing Market Assessment 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing

DP6. Lifetime homes and wheelchair housing

- 6.1 Core Strategy policy CS6 indicates that Council will seek a variety of housing types suitable for people with mobility difficulties. Policy DP6 helps to deliver this by setting out our approach to lifetime homes and wheelchair housing.
- 6.2 Although mobility difficulties should be considered in the design of all forms of housing, the standards for lifetime homes and wheelchair accessibility relate primarily to the layout of self-contained homes. As occupants of student housing will only stay for a limited period, student housing is not expected to meet lifetime homes standards. The proportion of students who are wheelchair users should reflect the general population, therefore the Council expects 10% of student flats or study-bedrooms (together with supporting communal spaces) to meet wheelchair standards.

DP POLICY

DP6 – Lifetime homes and wheelchair housing

All housing development should meet lifetime homes standards. 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them.

- 6.3 The Council considers that people with mobility difficulties, including disabled people, should have access to a range of housing types that match the range available to those without mobility constraints. Mobility difficulties can affect children, young people, adults and older people. They can affect people who live in large families, small households and people living alone. Where people have support needs related entirely to a physical disability, the Council will seek to provide them with support in their own home.
- 6.4 A lifetime home supports the changing needs of a family's lifecycle, from raising children through to mobility issues in old age, essentially allowing people to live in their home for as much of their life as possible. Lifetime homes involve design features that have been tailored to foster accessible living, helping to accommodate old age, injury, disability, pregnancy and pushchairs. These features also allow a dwelling to be easily adapted for even higher levels of accessibility in the future, if the need arises. Lifetime homes exceed the requirements of Part M of the Building Regulations.
- 6.5 Lifetime homes standards will be applied to all developments of self-contained housing, including conversions, reconfigurations and changes of use (the standards do not apply to student housing). The standards will also be applied to proposals for bedsits or other permanent housing with shared facilities if the development could be occupied lawfully as self-contained dwellings in Use Class C3 without submission of a further planning application (please see paragraphs 9.2 to 9.3 for more details). The Council acknowledges that the design or nature of some existing properties means that it will not be possible to meet every element of the lifetime homes standard, for example in listed buildings, but considers that each scheme should achieve as many features as possible. All housing proposals should be accompanied by a submission showing how each of the lifetime homes standards will be met, with a full justification why any individual element will not be met. New build schemes are expected to incorporate all lifetime homes features. Further information on lifetime homes can be found in our Camden Planning Guidance supplementary planning document.
- 6.6 To provide independence and quality of life for wheelchair users, the Council will expect 10% of dwellings either to meet wheelchair housing standards, or be designed so a future occupier can easily adapt the dwelling to meet wheelchair housing standards. The percentage will be applied to all developments providing 10 or more self-contained homes, including conversions, reconfigurations and changes of use, and will also be applied to student housing. The percentage



will also be applied to proposals for bedsits or other permanent housing with shared facilities if the development could be lawfully occupied as 10 or more self-contained dwellings in Use Class C3 without submission of a further planning application (please see paragraphs 9.2 to 9.3 for more details). However, where proposals involve re-use of an existing building (particularly a listed building), the percentage will be applied flexibly taking into account of any constraints that limit adaptation to provide entrances and circulation spaces that are level and wide enough for a wheelchair user.

- 6.7 Ideally, wheelchair housing should be tailored to the specific needs of an individual wheelchair user and their household. Although tailoring housing to the occupier is rarely possible in proposals for speculative market housing, it can be achieved for affordable housing, where future occupiers can be identified by local housing managers, from the Housing Register (waiting list), and from transfer lists.
- 6.8 The Council will apply the wheelchair housing percentage across each affordability category in a scheme, generally seeking 10% of market housing, 10% of social housing and 10% of intermediate housing. For the 10% of market housing, future occupiers will often be unknown until after the homes have been fitted out. Where the 10% market housing is not fully fitted-out to meet the standards, it should be laid out to provide all the necessary circulation space within and between rooms, including bathrooms and toilets, as subsequent changes to these arrangements can be costly and difficult.
- 6.9 For social rented housing and intermediate housing, each type should include 10% of homes designed, built and fitted-out to meet wheelchair housing standards. The Council may use its affordable housing fund to support the creation of fully-fitted out affordable wheelchair accessible housing. We may seek to increase the percentage of affordable wheelchair accessible homes and reduce the percentage of market wheelchair accessible homes where this will enable us to meet the needs of identified future affordable housing occupiers. We may also agree to increase the percentage of social rented wheelchair homes and reduce the percentage of intermediate affordable wheelchair homes (or vice versa) where this will better enable us to meet the needs of identified future occupiers. More detailed information is included in our Camden Planning Guidance supplementary development document.

Key evidence and references

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Accessible London: achieving an inclusive environment – London Plan Supplementary Planning Guidance; Mayor of London; 2004

DP13. Employment premises and sites

- 13.1 Having a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility is vital to maintaining and developing Camden's economy. An increase in the number and diversity of employment opportunities is fundamental to improving the competitiveness of Camden and of London. The Council wants to encourage the development of a broad economic base in the borough to help meet the varied employment needs, skills and qualifications of Camden's workforce.
- 13.2 Camden Core Strategy Policy CS8 – *Promoting a successful and inclusive Camden economy* sets out our overall strategy for Camden's economy. It aims to make sure that the borough's economy will be stronger and more diverse while helping more residents to have the skills, education and training to take up local job opportunities and bridge Camden's skills gap. It identifies the locations for major office development, protects Camden's main Industry Area and industrial premises, as well as supporting business growth and employment initiatives and encouraging training schemes. Policy DP13 supports the delivery of the Core Strategy by ensuring that sufficient sites are retained to enable a variety of commercial and industrial business to find premises and continue to operate. It is therefore important to refer to Core Strategy policy CS8 alongside this policy.

DP POLICY

DP13 – Employment premises and sites

The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:

- a) it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and
- b) there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.

Where a change of use has been justified to the Council's satisfaction, we will seek to maintain some business use on site, with a higher priority for retaining flexible space that is suitable for a variety of business uses.

When it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential uses or community uses, except in Hatton Garden where we will expect mixed use developments that include light industrial premises suitable for use as jewellery workshops.

Where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:

- c) the level of employment floorspace is maintained or increased;
- d) they include other priority uses, such as housing and affordable housing;
- e) premises suitable for new, small or medium enterprises are provided;
- f) floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses;
- g) the proposed non-employment uses will not prejudice continued industrial use in the surrounding area.

The Council will support the provision of live/work premises provided they do not:

- h) result in the loss of any permanent residential units; or
- i) result in the loss of sites in business or employment use where there is potential for that use to continue.

- 13.3 When assessing proposals that involve the loss of a business use we will consider whether there is potential for that use to continue, taking into account whether the site:
- is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;
 - is in a location suitable for a mix of uses including light industry and local distribution warehousing;
 - is easily accessible to the Transport for London Road Network and/or London Distributor Roads;
 - is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;
 - has adequate on-site vehicle space for servicing;
 - is well related to nearby land uses;
 - is in a reasonable condition to allow the use to continue;
 - is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards;
 - provides a range of unit sizes, particularly those suitable for small businesses (under 100sqm).
- 13.4 Where it is proposed to redevelop employment land for another business use, including offices, the Council will seek to retain physical features that will enable the flexible use of the premises for a range of business purposes. This will help to maintain the range of employment premises available and is especially important given the limited supply of non-office premises. The typical design features that enable flexible use are:
- clear and flexible space with few supporting columns;
 - adequate floor to ceiling heights;
 - wide doors/corridors;
 - loading facilities;
 - large amounts of natural light;
 - availability of a range of units sizes; and
 - space for servicing by/parking of commercial vehicles.
- More information on the demand for different types and specification of business premises can be found in Camden Planning Guidance.
- 13.5 In addition to the considerations above, where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. The property should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers. More information on our approach to changes of use involving employment sites and premises can be found in Camden Planning Guidance.
- 13.6 Where premises or sites are suitable for continued business use, the Council will consider redevelopment schemes which maintain the employment floorspace and provide other priority uses, such as housing. The re-provision of employment floorspace should be able to accommodate a range of business types and sizes (e.g. new businesses, small and medium sized enterprises¹ (SMEs) and creative businesses). Applicants must demonstrate to the Council's satisfaction that the commercial element is appropriate to meet the likely needs of the end user. The provision of inappropriate business space (e.g. inappropriate floor to ceiling height or poor access arrangements) will not be acceptable as this often fails to attract an occupier, which can lead to vacancy. Clear separation of the residential element and effective management of the business space will also be important. This is in line with the approach to flexible and affordable workspace that is taken in the Core Strategy policy CS8 – *Promoting a successful and inclusive Camden economy*. Further information on new workspace can be found in Camden Planning Guidance.

REFERENCES

¹ SMEs are business employing less than 50 people (small) and or less than 250 (medium) (ref: European Commission Recommendation 2003/361/EC: SME Definition)



Hatton Garden

- 13.7 In the Hatton Garden area, the conversion of office premises will only be permitted where it can be demonstrated that they have been vacant and marketed for at least two years (see para 13.5 above) and they are replaced by a mixed use development that includes light industrial premises suitable for use as jewellery workshops and residential uses, where appropriate. We will use planning obligations and conditions to ensure that premises are suitable for jewellery uses in terms of design, layout and affordability.
- 13.8 Where proposals would increase total gross floorspace by more than 200 sq m, we will seek to negotiate up to 50% of the additional floorspace as affordable premises suitable for the jewellery sector and housing, in accordance with policy DP1 on mixed use development. When the provision of workspace is not possible due to the nature of the site or the development, we will seek a financial contribution towards support for the jewellery industry. The requirement to provide workspace will be determined by the supply of such space in the area. Where considered appropriate, contributions towards training and support activities for industry in Hatton Garden may be sought in lieu of workshop provision. The level of contribution will be related to the area of workspace that would otherwise have been expected.

Live/work premises

- 13.9 It is recognised that combined live/work units can provide a valuable contribution to the range of business premises and may enable certain sites to remain in employment use. The Council will allow live/work developments where they do not result in the loss of sites that are suitable for continued business use or where they would involve the loss of permanent housing. The circumstances where continued business use would be required are detailed above in para 13.3. Planning conditions or obligations will be used to secure an element of workspace within live/work premises to ensure that a suitable working environment is provided and retained. Live/work units will be treated in the same way as housing for the operation of all other policies in this document and Camden's Core Strategy, including those on the provision of affordable housing and parking.
- 13.10 Developments of multiple live/work units will require careful management to ensure that they can become economically successful. Management could be provided by a housing association, a business support enterprise, academic/research institution or a private management company. Applicants should provide details of management arrangements for proposed live/work premises.

Definitions

13.11 Throughout this section the terms ‘business’ and ‘employment’ are used to refer collectively to the following uses:

- offices, research and development, and light industry (Use Class B1);
- general industrial uses (Use Class B2);
- storage and distribution (warehousing) (Use Class B8);
- other unclassified uses of similar nature to those above, such as depots or live/work (classed as sui generis).

Key evidence and references

- Camden Employment Land Review 2008
- Camden Business Survey (within the Employment Land Demand Study) 2004
- Camden Jewellery Sector Investment Plan 2005
- Camden Economic Development Strategy 2009
- Demand for premises of London’s SMEs; LDA 2006
- European Commission Recommendation 2003/361/EC: SME Definition
- Industrial Capacity Supplementary Planning Guidance to the London Plan; March 2008
- Planning Policy Statement (PPS) 4 – Planning for Sustainable Economic Growth; CLG; 2009



Promoting sustainable and efficient transport

- 16.1 Camden faces significant challenges relating to transport and travel, in particular air pollution and the congestion experienced on its road and public transport networks, as well as the need to address the wider issue of carbon dioxide emissions associated with travel. These issues have significant implications on the health and well being of the community. Camden's Core Strategy aims to promote sustainable and efficient travel (see policy CS11) by supporting strategic infrastructure projects in support of growth, promoting sustainable forms of transport, and making private transport more sustainable. This will support social cohesion and help to address health inequalities by providing better access for all to employment, education, facilities and encouraging more physical activity. In order to meet the challenges we face and to deliver Core Strategy aims, Camden Development Policies includes six policies on transport, covering:
- the transport implications of development (DP16);
 - walking, cycling and public transport (DP17);
 - parking standards and limiting the availability of car parking (DP18);
 - managing the impact of parking (DP19);
 - the movement of goods (DP20);
 - development connecting to the highway network (DP21).
- 16.2 Almost every development that affects the transport network will have impacts in more than one of these areas. Therefore there is a need to refer to all relevant policies.



DP16. The transport implications of development

- 16.3 It is essential that new development is supported by adequate transport infrastructure. Camden Core Strategy policy CS11 states that the Council will pursue the delivery of additional transport infrastructure and promote sustainable transport in order to support growth in the borough, and will manage the impact of growth on the road network. Policy DP16 seeks to help deliver the Core Strategy by ensuring that the transport implications of development are managed, and additional transport infrastructure is delivered where needed, in order to ensure that growth in the borough is integrated with existing places and transport networks, and does not generate excessive demands on transport infrastructure. It should be read in conjunction with Core Strategy Policy CS11 as well as policies DP17 to DP21 below.
- 16.4 Transport considerations should be integral to a development. Developments should be planned taking into consideration the movement of people and goods, both within the development site and outside it.

DP POLICY

DP16 – The transport implications of development

The Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. We will resist development that fails to assess and address any need for:

- a) movements to, from and within the site, including links to existing transport networks. We will expect proposals to make appropriate connections to highways and street spaces, in accordance with Camden's road hierarchy, and to public transport networks;
- b) additional transport capacity off-site (such as improved infrastructure and services) where existing or committed capacity cannot meet the additional need generated by the development. Where appropriate, the Council will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts, for example using transport assessments and travel plans;
- c) safe pick-up, drop-off and waiting areas for taxis, private cars and coaches, where this activity is likely to be associated with the development.

Movements to, from and within a site

- 16.5 Developments should link in well with their surroundings by allowing for movement to and through development sites, in order to contribute to improved accessibility across the borough. Some developments may need to be designed to accommodate public routes across a site, for example because they straddle an existing road or footpath. Designs for large sites should be permeable so that linkages and public through routes are created and the development is integrated into the wider street pattern. Developments should generally be designed to accommodate movements into and across the site rather than as closed blocks with a single entrance/ exit point. The Council expects design of new developments to be safe and accessible to all (see Core Strategy Policy CS17 – *Making Camden a safer place*), and will resist new development designed as a 'gated community' (see also our Camden Planning Guidance supplementary document).

- 16.6 Creating motor vehicle access from the road network is not sufficient to integrate a development with walking, cycling and public transport networks. To ensure integration into wider networks, development is expected to contribute to off-site measures where existing connections are not appropriate to serve a development. The networks that are relevant, including the Camden road hierarchy, and the measures that may be needed are considered further in policy DP21 – *Development connecting to the highway network* and our Camden Planning Guidance document).

Transport capacity

- 16.7 It is essential that there is sufficient transport capacity available to allow for travel demands generated by new development, including cumulative demand. Where necessary, proposals should include on-site measures as well as off-site contributions to increase capacity, including contributions towards the delivery of strategic transport infrastructure (see Core Strategy Policy CS11) in accordance with the London Plan. The enhancement of off-site capacity will usually only arise from developments that generate significant travel demand, and for these a formal Transport Assessment and Travel Plan will be required to indicate the measures needed in association with development (see paragraphs 16.9 to 16.19 below). In addition, the Mayor has introduced a policy in the London Plan, and prepared Supplementary Planning Guidance – *Use of planning obligations in the funding of Crossrail*, to seek financial contributions from new development towards the delivery of Crossrail. Crossrail will help to support growth in London by tackling congestion and the lack of capacity on the existing rail network.
- 16.8 Development proposals will need to be accompanied by an indication of their implications for the transport network unless they involve minimal trip generation. It will often be possible to address basic issues (movement on and around the site and linkages to transport networks) through the Design and Access Statement, which is a nationally required submission with most planning applications.

Transport assessments

- 16.9 Where the transport implications of proposals are significant, the Council will require a Transport Assessment to examine the impact on transport movements arising from the development. An indicative threshold for developments that will require a Transport Assessment is set out in Appendix 1.
- 16.10 The purposes of an assessment are to ensure that a proposal will not cause harm to the transport network or to highway safety, to show that the development will be properly integrated into the network, and indicate the extent to which there is additional capacity available to accommodate new travel patterns.
- 16.11 Transport assessments should:
- consider all types of movement associated with a proposal, both during construction and after completion, including an analysis of existing and proposed trips generated by the existing site and the proposed development for all transport modes and the impact these trips will have on the transport network;
 - identify specific routes over which existing and proposed trips are taking place;
 - address the movement of goods and materials, including the removal of spoil and demolition waste, delivery of construction equipment and materials, and servicing the completed development with refuse and goods vehicles;
 - consider the cumulative impact of the proposal with any others that will affect the same infrastructure, and whether the existing or committed capacity will be able to accommodate all of them; and
 - indicate the steps that a developer will need to take to ensure that a proposal will be connected to existing transport infrastructure and will not have a negative impact on the capacity of existing infrastructure. These steps should include the provision of both on- and off-site measures, as necessary. The enhancements involved are considered further in connection with policy DP17 – *Walking, cycling and public transport*.

- 16.12 An assessment should only take account of planned transport provision where this has fully secured funding and has a firm start date (see policy CS11 and Appendix 1 in the Camden Core Strategy for further information regarding key planned transport infrastructure projects in the borough). Where existing and proposed public transport provision will not have sufficient capacity to serve the development, the Council will expect to secure funding towards the enhancement of public transport capacity.
- 16.13 The depth of analysis for a transport assessment will reflect the scale and kind of a development and the nature and capacity of the transport network in the area. Further information about transport assessments is given in our Camden Planning Guidance supplementary document. Transport for London's *Transport Assessment Best Practice Guidance* (May 2006) also provides guidance on the submission of transport assessments: all applications that are referred to the Mayor should comply with this guidance.
- 16.14 Applicants for developments that are close to London Underground assets should also contact Transport for London's London Underground Infrastructure Protection team at an early stage before the commencement of design work to ensure that any constraints are addressed.
- 16.15 The concentration of schools in some parts of Camden, including the Hampstead and Belsize Park areas, has led to traffic congestion, road safety and parking problems related to the 'school run'. As part of transport assessments, applications for new schools and for the expansion of existing schools will be expected to provide details of the projected growth in student numbers, how students are likely to travel, their impact on the transport system and any measures to offset transport problems. In areas with an existing problem with the school run, it is unlikely that the Council will grant planning permission for educational facilities that are likely to exacerbate the problem.
- 16.16 For larger developments that would have implications for transport, but fall below the threshold for transport assessments, the following information will be required from applicants:
- an indication of the scale, mode, type and frequency of all trips associated with the development on a daily basis;
 - a description of how this transport demand can be accommodated by walking, cycling, public transport, and any other sustainable alternative modes of travel, as set out in policy DP17 below;
 - an overview of how potential highway impacts associated with the construction of the proposed development will be remedied or mitigated, and how local amenity will be preserved during the construction period; and
 - an overview of the servicing requirements of the development after occupation and of the servicing provision made to accommodate this.



- 16.17 The indicative scale of development schemes where this information will be required is set out in Appendix 1.

Travel Plans

- 16.18 Wherever a Transport Assessment is needed, submission of a travel plan is also expected as one way of mitigating the transport impact of the development. However, travel plans may also be sought from smaller developments if the impacts on transport are considered significant.
- 16.19 The Transport for London *Guidance for Workplace Travel Planning for Development* (2008) states that a simplified travel plan (an Enterprise Scale Travel Plan) should be provided for businesses and establishments below the Travel Plan thresholds where 20 or more staff will be employed. Transport for London also provides guidance on the production and use of travel plans for residential development in its *Guidance for Residential Travel Planning in London* (2008). Further information is also provided within our Camden Planning Guidance supplementary document, and in *Making residential travel plans work: guidelines for new development* (Department of Transport, 2005).

Other management plans

- 16.20 Where appropriate, Delivery and Servicing Management Plans, Visitor Management Plans and Construction Management Plans may be required to be submitted alongside planning applications. If these are not required in assessing a planning application but are still considered necessary to mitigate associated impacts, their submission will be secured through legal agreements. Please see policy DP20 for further details regarding the Council's approach to the movement of goods and materials, including the use of Delivery and Servicing Management Plans and Construction Management Plans.

Safe pick-up, drop-off and waiting areas

- 16.21 Developers will be expected to assess fully the impact of vehicle movements associated with pick-up, drop-off and waiting. Development that is likely to attract significant numbers of taxis, minicabs and coaches should be designed with appropriate passenger pick-up and drop-off points, each providing appropriate spaces and management arrangements to prevent harm to highway safety, pedestrian movements or amenity. Facilities should allow people with disabilities to get safely in and out of taxis and minicabs. Where possible, developments should include the pick-up and drop-off facilities they need on-site, but off-site arrangements will sometimes be necessary. Where it is not possible to provide for a suitable set down point for coaches, the Council may negotiate planning obligations with developers to prevent coach access to these sites.
- 16.22 Visitor attractions and accommodation can generate significant vehicle movements, particularly by taxi and coach. Further information on the Council's approach to proposals for tourism development and visitor accommodation is set out in policy DP14.

Key evidence and references

- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- Draft Camden Green Transport Strategy 2008 – 2012
- Camden Walking Plan Second Edition 2006
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001
- Transport Assessment Best Practice Guidance; Transport for London; May 2006
- Guidance for Workplace Travel Planning for Development; Transport for London; March 2008
- Guidance for Residential Travel Planning in London; Transport for London; March 2008
- Making residential travel plans work: guidelines for new development; Department of Transport; 2005.

DP17. Walking, cycling and public transport

- 17.1 The provision of sustainable travel options is essential in order to reduce the environmental impact of travel, to support future growth, to relieve pressure on Camden's existing transport network, and to provide alternatives to the private car. Core Strategy policy CS11 sets out at a strategic level how the Council will promote sustainable transport modes. Policy DP17 sets out in more detail the Council's requirements for new development in terms of provision for walking, cycling and public transport, in conjunction with CS11 and policies DP16 and DP18 – DP21.

DP POLICY

DP17 – Walking, cycling and public transport

The Council will promote walking, cycling and public transport use. Development should make suitable provision for pedestrians, cyclists and public transport and, where appropriate, will also be required to provide for interchanging between different modes of transport. Provision may include:

- a) convenient, safe and well-signalled routes including footways and cycleways designed to appropriate widths;
- b) other features associated with pedestrian and cycling access to the development, where needed, for example seating for pedestrians, signage, high quality cycle parking, workplace showers and lockers;
- c) safe road crossings where needed;
- d) bus stops, shelters, passenger seating and waiting areas, signage and timetable information.

The Council will resist development that would be dependent on travel by private motor vehicles.

The Council will seek to secure travel interchange facilities in locations that maximise travel benefits and minimise environmental harm. Passenger transport interchanges should provide for the co-ordination of arrival and departure timetabling on different services as far as possible. Interchanges catering for longer distance journeys should include toilets, baby changing facilities and facilities to provide refreshment for travellers.

- 17.2 Accessibility in Camden is generally good, with the majority of the borough already served by frequent public transport services through London Underground, London Overground, rail and bus links. There are few areas in the borough where development would have relatively limited accessibility to public transport (for example at the fringes of Hampstead Heath). In such areas, private cars may be the only practical option for some journeys. However, it is possible throughout Camden to provide for some journeys to be made in more sustainable ways. Developments will be dependent on travel by private motor vehicles if they are designed without a safe means of access to footways, nearby bus-stops, and a road or other route appropriate for cyclists. These will therefore be minimum requirements for all development.
- 17.3 The design of a development and the way it relates to transport networks will be major factors influencing the transport choices of future occupiers and visitors. To encourage people to make sustainable transport choices, the options available will need to form a continuous network of convenient and pleasant routes that make people feel safe, link to all parts of the borough, are easy to use by people with mobility difficulties, and be integrated by facilities to make it easy to change between one form of transport and another.

Footpaths and cycle routes

- 17.4 The Council will expect new developments to provide appropriate, safe pedestrian and cycle links as part of schemes in order to promote sustainable travel and enhance accessibility, including for vulnerable users. The provision of pedestrian and cycle links also helps to promote more active, healthy lifestyles. In order to maintain pedestrian and cyclist safety, links should be designed to prevent conflict between motor vehicles, cyclists and pedestrians. Footpaths need to be wide enough for the number of people who will use them so they do not spill onto roads. They should also include features to assist vulnerable road users, including the provision of dropped kerbs and textured paving where appropriate.
- 17.5 Safe facilities for cyclists, either fully segregated or on the road, offer the best prospect for reducing the level of cycling on pavements. Measures for walking and cycling will often need to extend beyond the site if development will increase flows nearby, for example, footway widening, new pedestrian crossing facilities, and improved sightlines for cyclists. Our Camden Planning Guidance supplementary document and Streetscape Design Manual include guidance on designing spaces for pedestrians and cyclists. Where appropriate, developments will be expected to contribute towards the walking and cycling initiatives set out in Core Strategy policy CS11.
- 17.6 We will seek shared surfaces in appropriate circumstances, and where it will be safe for all users, for example at locations with high levels of pedestrian activity and where traffic speeds and volumes are low. Shared surfaces are unlikely to be appropriate on through-routes for cyclists.
- 17.7 Transport for London's *Walking Plan* (2004) and *Improving Walkability* (2005) good practice guidance documents set out strategic guidance and objectives to improve the pedestrian environment and encourage walking in the capital.

Other features for pedestrians and cyclists

- 17.8 The availability of routes alone is not sufficient to provide access to a development for pedestrians and cyclists, and many developments will need to make other provisions.
- 17.9 The nature and quality of features for pedestrians and cyclists is also highly important in order to create pleasant public spaces that are accessible to all, including people with mobility difficulties. Developments should provide features for pedestrians and cyclists that contribute towards the Council's objectives for promoting walking and cycling (see Core Strategy policy CS11 – *Promoting sustainable and efficient travel*), and to the creation of high quality public spaces, as required in Core Strategy policy CS14 – *Promoting high quality places and conserving our heritage* (see also policy DP21 – *Development connecting to the highway network* below).
- 17.10 At origins and destinations, cyclists will need storage for bicycles, equipment and protective clothing, and will often need to shower. High quality cycle parking is required in accordance with policy DP18 – *Parking standards and limiting the availability of car parking* and guidance in our Camden Planning Guidance supplementary document.
- 17.11 Contributions towards wider cycle initiatives may also be sought from new developments. See Core Strategy Policy CS11 for further information on cycle hire and cycle stations, which are integral elements of the Council's approach to promoting cycling.





Buses

- 17.12 In most developments, measures to enable use of buses will focus on provision of information within the development, improving the route to a stop, and enhancing bus-stop facilities: possible measures include signing the route, seating and shelters. There may be occasions when there is no spare capacity on existing bus services, and to enable a development to benefit from public transport services, a financial contribution to increase capacity would be necessary (for example, additional bus lane provision, or priority for buses at traffic lights). It may sometimes be necessary to pool contributions, particularly where there are cumulative impacts from nearby developments and an increase in capacity is needed.

Provision for interchange between transport modes

- 17.13 Most journeys involve changing between one form of travel and another and developments will sometimes need to cater for this. The creation of convenient and pleasant interchanges will encourage people to use alternatives to the car. A number of existing interchange points in the borough are likely to be developed in conjunction with the borough's growth areas (see Camden Core Strategy policy CS2) and with programmed transport investment. Interchanges around which additional development is expected to come forward include Euston Station, Tottenham Court Road Station, West Hampstead and Camden Town Underground Station.
- 17.14 Where development is proposed at an interchange between public transport services, the Council will expect the inclusion of facilities to make interchange easy and convenient for all users, and maintain passenger comfort. In line with Camden Core Strategy policies CS14 – *Promoting high quality places and conserving our heritage* and CS17 – *Making Camden a safer place*, works affecting interchanges should seek to provide high quality spaces that are safe for all users, and encourage people to use public transport and walk and cycle to destinations.

Key evidence and references

- Draft Camden Green Transport Strategy 2008 – 2012
- Camden Walking Plan Second Edition 2006
- Camden Cycling Plan: fourth annual review (2008)
- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- Camden Interim Parking and Enforcement Plan 2005/11
- Camden Road Network Management Plan
- Camden Streetscape Design Manual 2005
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

DP18. Parking standards and limiting the availability of car parking

- 18.1 Limiting the supply of car-parking is a key factor for addressing congestion in the borough and encouraging people to use more sustainable ways to travel (see Core Strategy policy CS11 – *Sustainable and efficient travel* for our overall approach to this). Policy DP18 sets out the Council's approach to parking in new development. It seeks to minimise the level of car parking provision in new developments, as well as promoting cycle parking, and the provision of spaces for car clubs and electric charging points. This policy should be read in conjunction with policy DP19, which sets out how the Council will address the potential negative impacts of parking associated with new development, and Core Strategy policy CS11.

DP POLICY

DP18 – Parking standards and limiting the availability of car parking

The Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area, the town centres of Camden Town, Finchley Road/Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport.

Development should comply with the Council's parking standards, as set out in Appendix 2 to this document. Where the Council accepts the need for car parking provision, development should not exceed the maximum standard for the area in which it is located (excluding spaces designated for disabled people). Developments in areas of on-street parking stress should be 'car capped'.

For car free and car capped developments, the Council will:

- a) limit on-site car parking to:
 - spaces designated for disabled people,
 - any operational or servicing needs, and
 - spaces designated for the occupiers of development specified as car capped;
- b) not issue on-street parking permits; and
- c) use a legal agreement to ensure that future occupants are aware they are not entitled to on-street parking permits.

Developments will also be expected to meet the Council's minimum standards for cycle parking set out in Appendix 2.

The Council will:

- d) strongly encourage contributions to car clubs and pool car schemes in place of private parking in new developments across the borough; and
- e) seek the provision of electric charging points as part of any car parking provision.

Car-free development

- 18.2 The Council generally expect development in Low Parking Provision Areas (i.e. the Central London area, our town centres and other areas with high public transport accessibility) to be car-free. Camden has been successfully securing car-free housing since 1997 as a way of encouraging car-free lifestyles, promoting sustainable ways of travelling, and helping to reduce the impact of traffic. Policy DP18 extends the car-free concept to non-residential development, which has the potential to reduce commuting by car and promote car-free work-related journeys. Car-free development can facilitate sustainability and wider objectives, including:
- freeing space on a site from car-parking, to allow additional housing, community facilities, play areas, amenity spaces and cycle parking;
 - enabling additional development where parking provision would not be acceptable due to congestion problems and on-street parking stress;
 - helping to promote alternative, more sustainable forms of transport.
- 18.3 Car-free development has no car parking within the site and occupiers are not issued with on-street parking permits. (People with disabilities who are Blue Badge holders may park in on-street spaces without a parking permit.) Car-free development should meet the Council's cycle parking standards and may, where required, include on-site space for people with disabilities, servicing, coach and taxi activity. The Central London Area and our town centres, other than Hampstead, are well-equipped to support car-free households and businesses as they have high levels of public transport accessibility, and provide opportunities to access a range of goods, services, workplaces and homes. Camden will expect development in these areas to be car-free, and will resist the inclusion of general car parking unless supported by a Transport Assessment or other compelling justification. See also paragraphs 18.8 and 18.9 below, which set out the Council's approach to removing rights to on-street parking.
- 18.4 Much of the rest of the borough has public transport accessibility levels that are moderate to excellent. Provided that parking controls are in force, the Council will expect car-free development where public transport accessibility is equivalent to levels in our town centres, and will strongly encourage it elsewhere.

Parking standards

- 18.5 Developments throughout the borough will be expected to comply with the parking standards set out in Appendix 2. The standards include:
- maximum parking standards for general car parking provision, to encourage people to consider all alternatives to private car travel;
 - minimum cycle parking standards, to encourage people to meet their travel needs by cycling;
 - minimum parking standards for people with disabilities to meet their needs; and
 - minimum standards for servicing, taxi and coach activity, to provide an alternative to on-street provision.





- 18.6 The maximum car parking standards include separate figures for Low Parking Provision Areas and for the rest of the borough. As we generally seek car free development in the Low Parking Provision Areas, we will only apply the car parking standards for these areas where a developer can demonstrate to the Council's satisfaction that such parking should be provided on a site.
- 18.7 The maximum car parking standards for employment generating uses are intended to limit the potential for commuting by private car (other than by disabled people). A workplace's operational needs are only considered to include journeys to work if travel is at times when public transport services are severely limited or if employees need continuous access to a car for work purposes whether or not they are at the workplace.
- 18.8 The Council will expect new developments in areas of high on-street parking stress to be car-capped. Car-capped development has a limited amount of on-site car parking, but no access to on-street parking permits in order to avoid any impact on on-street parking. The level of on-site provision must meet the car and cycle parking standards in Appendix 2 for the area in which a development is located, and may, where required, include on-site space for people with disabilities, servicing, coach and taxi activity. Policy DP19 below addresses in more detail the impact of parking associated with new development, including on on-street parking conditions.
- 18.9 To implement car-free and car-capped development, the Council needs to remove entitlements for parking permits from future occupiers. This will be achieved through seeking a legal agreement with the developer, as it is the only way of ensuring that all incoming occupiers are aware that they are not eligible for a permit to park on the street.
- 18.10 The Council's Parking Standards apply to all development, whether involving new construction or a change in the use of an existing building. The Council accepts the need for a flexible approach to some aspects of the minimum parking standards, for example where the nature of the street frontages preclude access to on-site car parking, and may consider the potential for designating disabled parking bays on-street. The Council will also consider the parking requirements from premises that are used by the emergency services.
- 18.11 Details of parking arrangements should be submitted with planning applications, showing how car, servicing and cycle parking requirements will be met. Guidance on the space requirements for car and cycle parking are included in Camden's Planning Guidance and Streetscape Design Manual.

Cycle parking

- 18.12 All developments will be expected to meet the Council's cycle parking standards, as set out in Appendix 2 to this document, as a minimum. The provision of cycle parking in new developments encourages a healthy and more sustainable alternative to the use of the private car.
- 18.13 Cycle parking provision should be provided with convenient access to street level and must be secure and easy for everyone to use. Cycle parking for residents and employees cannot usually be met off-site due to the security and shelter necessary for long stays. Where applicants demonstrate that cycling provision according to these standards is not feasible on a development site, the Council may seek a contribution to off-site provision in lieu of provision within the site. Please also see policy DP17 for further guidance relating to the provision of facilities for cyclists in new developments. Further guidance on cycle parking and storage is contained in the Camden Planning Guidance supplementary document.

Car clubs and pool cars

- 18.14 Camden Core Strategy policy CS11 states that the Council will expand the availability of car clubs and business pool cars as an alternative to the private car. Car clubs and pool cars offer the benefit of removing the need for car ownership for many households and discourage the use of the car for journeys, including commuting and business trips that could be made by more sustainable modes, thus reducing the use of cars and the need for car parking spaces.
- 18.15 The Council will strongly encourage developers to provide or contribute towards car club or pool car spaces in as an alternative private parking. Provision of new spaces within developments will be encouraged in locations where they can be made available to car-club members.

Low emission vehicles

- 18.16 Camden Core Strategy policy CS11 promotes the use of low emission vehicles, including through expanding the availability of electric charging points. The Council will encourage the provision of electric vehicle charging spaces in new developments, including for electric pool cars or electric car-club cars. For general car parking, such spaces should be provided within the maximum standards set out in Appendix 2 – *Parking Standards*. The emerging draft replacement London Plan also supports the provision of electric charging points in new developments, and the Mayor's Electric Vehicle Delivery Plan for London sets out a range of measures to encourage the use of electric vehicles and increase the number of charging points across the capital, including through provision as part of new developments.
- 18.17 The Council will encourage the provision of electric vehicle charging spaces in new developments, including for electric pool cars or electric car-club cars. For general car parking, such spaces should be provided within the maximum standards set out in Appendix 2 – *Parking Standards*.

Key evidence and references

- Camden Green Transport Strategy 2008 – 2012
- Camden Local Implementation Plan (LIP) 2005/06 – 2010/The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Let's talk rubbish! Camden's waste strategy 2007-2010 (revision 1, 2008)
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

DP19. Managing the impact of parking

- 19.1 Policy DP18 above sets out our approach to parking standards. Developments that add to the supply of car parking, or relocate car parking, can have an impact on parking conditions in the borough. They can also affect the environment, for example through loss of landscape features and increased surface run-off through additional hard surfacing.
- 19.2 Policy DP19 builds on the approach set out in Policy DP18 above by addressing the potential impacts of parking associated with development in terms of on-street parking conditions and wider environmental considerations. It should be read in conjunction with Core Strategy Policy CS11 and policies DP16 – DP18 and DP20 – DP21 in this document.

DP POLICY

DP19 – Managing the impact of parking

The Council will seek to ensure that the creation of additional car parking spaces will not have negative impacts on parking, highways or the environment, and will encourage the removal of surplus car parking spaces. We will resist development that would:

- a) harm highway safety or hinder pedestrian movement;
- b) provide inadequate sightlines for vehicles leaving the site;
- c) add to on-street parking demand where on-street parking spaces cannot meet existing demand, or otherwise harm existing on-street parking conditions;
- d) require detrimental amendment to existing or proposed Controlled Parking Zones;
- e) create a shortfall of parking provision in terms of the Council's Parking Standards for bicycles, people with disabilities, service vehicles, coaches and taxis;
- f) create a shortfall of public car parking, operational business parking or residents' parking;
- g) create, or add to, an area of car parking that has a harmful visual impact.

The Council will require off-street parking to:

- h) preserve a building's setting and the character of the surrounding area;
- i) preserve any means of enclosure, trees or other features of a forecourt or garden that make a significant contribution to the visual appearance of the area; and
- j) provide adequate soft landscaping, permeable surfaces, boundary treatment and other treatments to offset adverse visual impacts and increases in surface run-off.

The Council will only permit public off-street parking where it is supported by a transport assessment and is shown to meet a need that cannot be met by public transport. The Council will expect new public off-street parking to be subject to a legal agreement to control the layout of the parking spaces, the nature of the users and the pricing structure. We will also seek a legal agreement to secure removal of parking spaces in response to any improvement to public transport capacity in the area.

Where parking is created or reallocated, Camden will encourage the allocation of spaces for low emission vehicles, car clubs, pool cars, cycle hire and parking, and electric vehicle charging equipment.



On-street car parking

- 19.3 On-street car parking spaces are a limited resource, and demand exceeds supply in much of the borough. They cater for residents who do not have off-street spaces at home as well as for people visiting businesses and services. The Council manages on-street parking on the basis of designated Controlled Parking Zones, in which regulations control how parking may be used on different sections of the street and at different times. There is a particularly high demand for on-street parking by residents in areas with a low availability of drives or garages.
- 19.4 Development that will reduce the amount of on-street parking or add to on-street parking demand will be resisted where it would cause unacceptable parking pressure, particularly in areas of identified parking stress. Policy DP18 states that, where the need for parking is accepted, developments in areas of high on-street parking stress should be 'car capped'. Our Camden Planning Guidance supplementary document gives details of areas where there is parking stress in the borough.
- 19.5 The following paragraphs set out the Council's approach to development where the creation of off-street private parking would reduce the number of on-street parking spaces.

Creating private off-street car parking

- 19.6 On-street spaces can be used by many different people with different trip purposes throughout the day. On the other hand, private spaces will generally only be used for one purpose, often by a specific vehicle, and will remain unused at other times. For example, a resident's private parking space will often be unused for most of the daytime if the car is used for the journey to work.
- 19.7 Creating private off-street parking frequently involves the loss of on-street spaces, for example where kerbside parking is removed to enable vehicles to cross over the pavement to a garden or forecourt. This can cause or worsen problems where there is already significant on-street parking demand. Providing off-street parking necessarily involves creating a link to the highway network or intensifying the use of an existing link, which can have implications for highway safety, ease of pedestrian movement and the adequacy of sightlines.
- 19.8 Off-street parking can cause environmental damage in a number of ways. Trees, hedgerows, boundary walls and fences are often the traditional form of enclosure in Camden's streets, especially in its conservation areas. This form can be broken by the removal of garden features and the imposition of extensive areas of paving and parked cars to the front of buildings, damaging the setting of individual buildings and the character of the wider area. Large areas of paving can also increase the volume and speed of water run-off (especially when formerly porous surfaces such as front garden planting areas are paved), which adds to the pressure on the drainage system and increases the risk of flooding from surface water. Policy DP23 sets out in further detail how the Council will address surface water issues associated with development.
- 19.9 Development of off-street parking will be resisted where it would cause unacceptable parking pressure, particularly in identified areas of parking stress. Off-street parking may also be resisted to protect the environment, highway safety and pedestrian movement. Our Camden Planning Guidance supplementary document gives details of areas of parking stress, the necessary dimensions for off-street parking spaces, visibility requirements at access points, and environmental concerns that arise from garden and forecourt parking.



Public off-street car parking

- 19.10 Camden does not support the creation of additional public off-street car-parking in the borough. Camden contains a large amount of private off-street car parking and a significant amount of public off-street car parking that was developed before car parking restraint was introduced and is beyond the Council's control. Established public off-street car parks in Camden are generally commercially operated and offer contract spaces to commuters. The Council is therefore unable to control their charges to effectively deter unnecessary car use.
- 19.11 Any proposal for additional public car-parking would need to be supported by a Transport Assessment, and by a submission detailing hours of operation, proposed means of entry control, access arrangements and layout of spaces. The submissions would need to show that the proposal would not be harmful in terms highway safety and on-street parking conditions, in accordance with criteria set out in Policy DP19. It would also need to show that the proposal would meet a need generated by a particular land-use or user group, for example hospitals, which could not be met by public transport. The Council would strongly resist creation of speculative public-car parking targeted at general demand.
- 19.12 The Council will seek a legal agreement to ensure that an appropriate pricing structure applies to any additional public car-parking. The pricing structure should:
- preclude free parking, as this would encourage unnecessary car journeys;
 - favour short stay parking (up to two hours), which is appropriate for collecting bulky goods or picking-up travellers with heavy luggage;
 - levy a punitive charge on long stay parking (over four hours) to deter commuting by car.
- 19.13 Where the Council accepts the case for a proposal for additional public car parking because it meets a travel need that cannot be met by public transport, we will seek a legal agreement to provide for the removal of that car parking if, in the future, improvements to public transport are made that would undermine the original case for the proposal. The agreement should arrange for removed spaces to be designated for people with disabilities or for more sustainable types of travel. Examples are car-clubs, electric vehicle charging points, and cycle hire and cycle parking (see paragraph 19.17 below and DP18 – *Parking standards and limiting the availability of car parking*).

Removing off-street car parking

- 19.14 In order to promote more sustainable modes of travel, the Council generally welcomes proposals to reduce the amount of off-street parking in the borough, provided that the removal of spaces would not:
- lead to a shortfall against minimum parking standards relating to bicycles, people with disabilities, service vehicles, coaches and taxis (see Appendix 2);
 - cause difficulties for existing users, particularly if the spaces are used by shoppers, by nearby residents, or for the operational needs of a business; or
 - displace parking to controlled parking zones, particularly in identified areas of parking stress.

- 19.15 The Council particularly welcomes proposals which include conversion of general car parking spaces to provide:
- designated spaces for people with disabilities, cycle parking, and any needs for off-street servicing, coach and taxis in accordance with the Parking Standards in Appendix 2; or
 - designated spaces for more sustainable forms of transport, such as car-clubs, cycle hire schemes and low emission vehicles.
- 19.16 Where car parking spaces are currently well-used or are associated with a significant generator of travel demand, the Council will expect submission of a transport assessment to show that the removal of spaces can be accommodated without harmful impact (see paragraphs 16.9 to 16.15 above). A travel plan may also be sought to help existing users switch to sustainable ways of travelling.

Low emission vehicles, pool cars, car-clubs, and cycle hire schemes

- 19.17 The Core Strategy promotes the use of walking, cycling, low emission vehicles, car clubs and pool cars as alternatives to the use of private cars. In dealing with proposals involving provision of additional parking or finding new uses for parking spaces, the Council will promote facilities for sustainable transport, including provision for cycle parking and cycle hire, low emission vehicles, pool cars and car clubs, as an alternative to creating general car parking spaces.

Key evidence and references

- Draft Camden Green Transport Strategy 2008 – 2012
- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

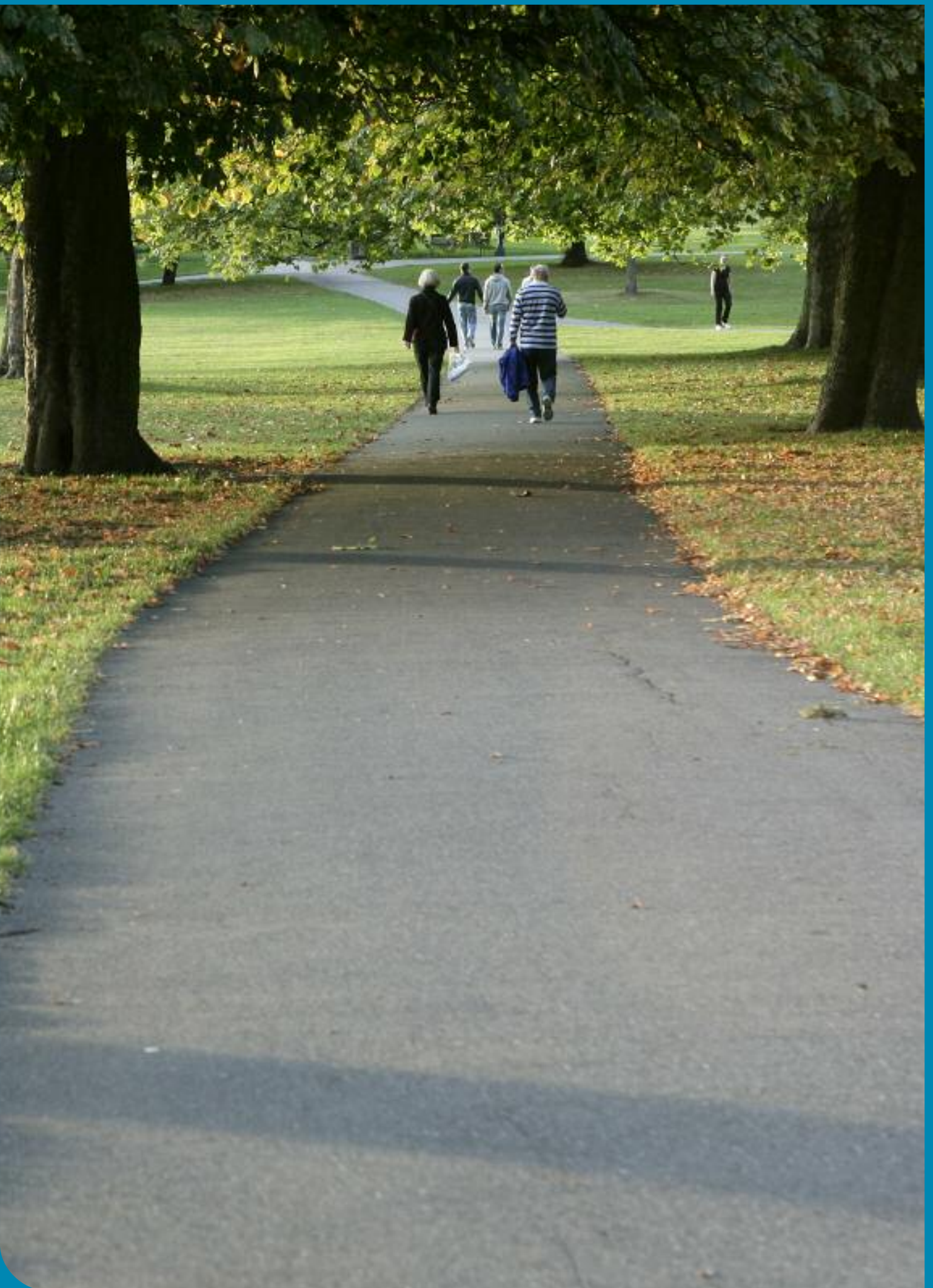




Section 3

A sustainable and attractive Camden – Tackling climate change and improving and protecting Camden’s environment and quality of life

- 2.1 The Core Strategy sets out our overall approach to managing Camden’s growth so that it is sustainable, meets our needs for homes, jobs and services, and protects and enhances quality of life and the borough’s many valued and high quality places. This helps to achieve *A Sustainable Camden that adapts to a growing population* – one of the elements in the vision in the Camden Community Strategy.
- 2.2 This section of Camden Development Policies contributes to delivering the Core Strategy by providing detailed policies that we will use when determining applications for planning permission to ensure that development contributes towards a sustainable and attractive Camden. In particular, it supports the Core Strategy by focussing on:
- promoting sustainable design and construction;
 - reducing our water consumption and the risk of surface water flooding;
 - securing high quality design and conserving our heritage;
 - managing the impact of development and noise and vibration;
 - providing and improving open space, sport and recreation; and
 - our approach to basements and lightwells, improving access, shopfront design and air quality and Camden’s Clear Zone.



Promoting sustainability and tackling climate change

DP22. Promoting sustainable design and construction

- 22.3 Promoting a sustainable Camden is an integral element of our Local Development Framework strategy. Core Strategy policy CS13 – *Tackling climate change through promoting higher environmental standards* sets out a key part of our overall approach to tackling climate change, which includes promoting higher environmental standards in design and construction. Policy DP22 – *Promoting sustainable design and construction* contributes towards delivering the strategy in policy CS13 by providing detail of the sustainability standards we will expect development to meet. DP22 should be read in conjunction with Core Strategy policy CS13 and policy DP23 – *Water*. Core Strategy policy CS11 and policies DP16 to DP21 in this document set out our approach to sustainable transport.
- 22.4 Although the need for sustainable design and construction is not specific to Camden, the borough's highly built-up, inner urban environment means that we face specific environmental issues such as poor air quality and surface water flooding but have fewer options on how we can implement sustainable development and minimise our carbon emissions. The measures we can take to minimise the impacts of climate change and adapt to its effects need to consider, and be appropriate to, Camden's dense and historic character and sensitive environments. They should also take opportunities to build on the borough's past high performance on requiring sustainable measures within developments.
- 22.5 Core Strategy policy CS13 states that the Council will have regard to the costs and feasibility of measures to tackle climate change within developments (paragraph 13.4). This approach also applies to policy DP22. We will also take into account the cumulative costs of not responding to the need to mitigate and adapt to climate change as well as the long term cost savings, such as on energy and water bills, to future occupiers. Measures to tackle climate change are integral in the development process and are a priority of the Council. Therefore they should not be seen as 'add-ons'.



DP POLICY

DP22 – Promoting sustainable design and construction

The Council will require development to incorporate sustainable design and construction measures. Schemes must:

- a) demonstrate how sustainable development principles, including the relevant measures set out in paragraph 22.5 below, have been incorporated into the design and proposed implementation; and
- b) incorporate green or brown roofs and green walls wherever suitable.

The Council will promote and measure sustainable design and construction by:

- c) expecting new build housing to meet Code for Sustainable Homes Level 3 by 2010 and Code Level 4 by 2013 and encouraging Code Level 6 (zero carbon) by 2016.;
- d) expecting developments (except new build) of 500 sq m of residential floorspace or above or 5 or more dwellings to achieve “very good” in EcoHomes assessments prior to 2013 and encouraging “excellent” from 2013;

- e) expecting non-domestic developments of 500sqm of floorspace or above to achieve “very good” in BREEAM assessments and “excellent” from 2016 and encouraging zero carbon from 2019.

The Council will require development to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures, such as:

- f) summer shading and planting;
- g) limiting run-off;
- h) reducing water consumption;
- i) reducing air pollution; and
- j) not locating vulnerable uses in basements in flood-prone areas.

Sustainable design and construction measures

- 22.6 The construction and occupation of buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of sensitively altering or retro-fitting buildings should always be strongly considered before demolition is proposed. All proposals for demolition and reconstruction should be fully justified in terms of the use of resources and energy, and the energy and water efficiency of the existing and proposed buildings. Where the demolition of a building cannot be avoided we will expect either the re-use of materials on-site or the salvage of appropriate materials to enable their re-use off-site. Where materials cannot be salvaged whole and where aggregate is required on-site, this demolished material should be crushed on-site for re-use, with measures taken to minimise dust and noise. Policy DP26 – *Managing the impact of development on occupiers and neighbours* sets out how we will expect development to limit the disturbance from dust due to demolition.
- 22.7 When a building is constructed, the accessibility of its location; its density and mix of uses; its detailed design taking into account the orientation of the site; and the mechanical services and materials chosen can all have a major impact on its energy efficiency. The Council will require all schemes to consider these general sustainable development principles, along with the detailed elements identified in the table below, from the start of the design process. Developments of 5 or more dwellings or 500sqm of any floorspace should address sustainable development principles in their Design and Access statements or in a separate Energy Efficiency Statement, including how these principles have contributed to reductions in carbon dioxide emissions. When justifying the chosen design with regards to sustainability the following appropriate points must be considered:



Design	Fabric/Services
<ul style="list-style-type: none"> • the layout of uses • floorplates size/depth • floor to ceiling heights • location, size and depth of windows • limiting excessive solar gain • reducing the need for artificial lighting • shading methods, both on or around the building • optimising natural ventilation • design for and inclusion of renewable energy technology • impact on existing renewable and low carbon technologies in the area • sustainable urban drainage, including provision of a green or brown roof • adequate storage space for recyclable material, composting where possible • bicycle storage • measures to adapt to climate change (see below) • impact on microclimate 	<ul style="list-style-type: none"> • level of insulation • choice of materials, including - responsible sourcing, re-use and recycled content • air tightness • efficient heating, cooling and lighting systems • effective building management system • the source of energy used • metering • counteracting the heat expelled from plant equipment • enhancement of/provision for biodiversity • efficient water use • re-use of water • educational elements, for example visible meters • on-going management and review

22.8 Our Camden Planning Guidance supplementary document contains detailed guidance on further elements of sustainable design and construction. Please also see Core Strategy policies CS16 – *Improving Camden’s health and well-being* and CS18 – *Dealing with our waste and encouraging recycling*, and policies DP32 – *Air quality and Camden’s Clear Zone* and DP28 – *Noise and vibration* in this document.

Green and brown roofs and green walls

- 22.9 Green and brown roofs and green walls play important roles in achieving a sustainable development. They retain rainfall and slow its movement, provide additional insulation, provide valuable habitat to promote biodiversity, provide opportunities for growing food, reduce the heating up of buildings and the wider city and provide valuable amenity space. They should be designed to enable the benefits that are most suitable for the site. This will include ensuring a sufficient soil depth is provided and selecting the correct substrate and vegetation. The design of green walls should ensure sufficient irrigation for plants without the need for excessive energy consumption for pumping water.
- 22.10 Green and brown roofs can be easily incorporated into a flat roof and, where carefully designed, on a pitched roof. Therefore, it is important that the inclusion of a green or brown roof is considered at the initial design stage. In historic areas where a specific roof form dominates, it may be possible to incorporate a green or brown roof at the rear of buildings where they would not be visible from the street. Further details on our expectation for green and brown roofs and green walls can be found in our Camden Planning Guidance supplementary document.

Sustainable design and construction assessment tools

- 22.11 The government has set environmental targets for all new build dwellings, in *Building a Greener Future: Towards Zero Carbon*, and produced the Code for Sustainable Homes as the tool to assess these targets. BREEAM (Building Research Establishment Environmental Assessment Method) and EcoHomes assessments, which apply to non-residential developments and residential development arising from conversions and changes of use respectively, are other tools which enable us to assess the environmental sustainability of a development.
- 22.12 These assessment tools contain several categories (such as Energy, Water, Materials, Waste, Surface Water, Management, Transport, Land use, Ecology, Health and Well-being, and Pollution). Each category contains credits that can be obtained by implementing a sustainable design or construction measure. All the credits obtained are weighted and added together to achieve the overall score, which relates to a rating of either Pass, Good, Very Good, Excellent or Outstanding.
- 22.13 For developments in Camden it is generally easy to obtain the transport credits in BREEAM and EcoHomes assessments as the borough is well served by public transport and services. The credits in the management category are also reasonably easy to obtain. Therefore, in recent years we have been successfully applying sub-targets, which we developed in consultation with the Building Research Establishment in 2006, within the assessment categories of Energy, Water and Materials. The securing of the credits in these categories is considered to have the greatest environmental benefits. These sub-targets ensure that developments have fully addressed the main issues of sustainable design and construction and climate change relevant to the borough. They can be found in our Camden Planning Guidance supplementary document. The Council will also expect developments to achieve any higher energy/carbon reduction, water and environmental sustainability targets set by the government in the future.
- 22.14 We have been successfully applying a minimum standard of Level 3 for the Code for Sustainable Homes and Very Good for EcoHomes for residential developments of 5 dwellings or more in the borough. As Camden receives some applications for particularly large dwellings with a relatively higher energy and water use, we will apply this approach to developments of 500sqm or more of residential floorspace. For new build housing we will continue to require developments to achieve Level 3 of Code for Sustainable Homes and encourage improvements in environmental sustainability performance in line with the government's timetable towards zero carbon housing. For EcoHomes assessments (for dwellings resulting from conversions and changes of use) we will continue to expect the existing target of Very Good. The government is consulting on ways to improve energy use in existing buildings and, therefore, we will encourage homes resulting from conversions and changes of use to meet a higher EcoHomes target in 2013, in line with the next stage of the government's timetable towards zero carbon for new housing. Works to listed buildings and development within conservation areas should also consider the policies set out in Core Strategy policy CS14 – *Securing high quality design* and DP25 – *Conserving Camden's heritage*.

- 22.15 We will also apply the 500sqm threshold to non-residential developments to ensure all developments of the same size make a minimum contribution to environmental sustainability. If feasible at the time, we will expect non-residential development to achieve a BREEAM rating of 'excellent' from 2016 so that such schemes make an increasing contribution to environmental sustainability, in line with that expected from housing development.
- 22.16 BREEAM and EcoHomes assessments and the Code for Sustainable Homes provide a good overall guide to the environmental sustainability of a development. However, the largest group of credits in the Energy category of these assessments do not consider the energy efficiency of the initial design. To ensure that developments firstly incorporate energy efficient design, we will require schemes to adopt appropriate energy efficiency principles as highlighted in paragraph 22.7 above. An example of energy efficiency principles are the Passivhaus standards. PassivHaus includes:
- very good levels of insulation with minimal thermal bridges;
 - good utilisation of solar and internal heat gains;
 - an excellent level of air tightness; and
 - good indoor air quality, provided by a whole house mechanical ventilation system with highly efficient heat recovery.

The Council will strongly encourage schemes to meet Passivhaus standards. Further details on energy efficient design and principles and PassivHaus are set out in our Camden Planning Guidance supplementary document.

Designing to adapt to climate change

- 22.17 It is predicted that in the future we will experience warmer and wetter winters and hotter and drier summers. These changes could lead to more intense rainfall and local flooding; subsidence due to increased shrinking and expanding of Camden's clay base; poorer air quality; a hotter micro-climate; and increased summer electricity use due to increased demand for cooling. Alongside the measures to reduce the effects of climate change set out above, we will require developments to incorporate appropriate measures to enable occupants to adapt and cope with climatic changes. Measures include:
- natural ventilation;
 - summer shading;
 - planting trees and vegetation;
 - openable windows;
 - the provision of external space; and
 - the inclusion of pervious surfaces to enable water to infiltrate the ground to reduce clay shrinking and flooding.





- 22.18 The Council will discourage the use of air conditioning and excessive plant equipment. In addition to increasing the demand for energy, air conditioning and plant equipment expel heat from a building making the local climate (microclimate) hotter. Where the use of this equipment is considered acceptable by the Council, for example where sterile internal air is required, we will expect development to make a contribution towards cooling the local environment. This could be through the provision of green or brown roofs, green walls and the planting of trees and vegetation, on or off-site. For further details on the methods that can be incorporated within a development to enable it and its occupants to adapt to climate change and on green and brown roofs and green walls, please refer to our Camden Planning Guidance supplementary document. For further details on how to consider microclimate see policy DP26 – *Managing the impact of development on occupiers and neighbours* and Camden Planning Guidance.
- 22.19 Our expectations on designing for water efficiency and addressing extreme rainfall can be found in policy DP23 – *Water*. Policy DP27 – *Basements and lightwells* sets out our expectations for basement development. Our approach to improving Camden's air quality is set out in policy DP26 – *Air quality and Camden's Clear Zone* and Core Strategy policy CS16 – *Improving Camden's health and well-being*. Please see policy DP24 – *Securing high quality design* for further details on other aspects of design.

Key evidence and references

- Towards a Sustainable Camden. Camden' Environmental Sustainability Delivery Plan 2008-2012
- Camden Sustainability Task Force Report on Energy and Energy Efficiency; 2007
- Planning Policy Statement: Planning and Climate Change – Supplement to Planning Policy Statement 1; Communities and Local Government; 2007
- Building A Greener Future; Communities and Local Government; 2006
- Sustainable Design and Construction – Supplementary Planning Guidance; Mayor of London; 2006
- Building A Brighter Future. A Guide to Low Carbon Building Design; Carbon Trust; 2005
- Building Research Establishment Environmental Assessment Method (BREEAM); Building Research Establishment; 2006 and 2008
- Strategy for Sustainable Construction; BERR; 2008
- Definition of Zero Carbon Homes and Non-domestic Buildings Consultation; CLG; 2008
- Heat and energy saving strategy Consultation; Department of Communities and Local Government & Department of Energy and Climate Change; 2009

Improving and protecting our environment and quality of life

DP24. Securing high quality design

- 24.1 Core Strategy policy CS14 – *Promoting high quality places and conserving our heritage* sets out the Council's overall strategy on promoting high quality places, seeking to ensure that Camden's places and buildings are attractive, safe, healthy and easy to use and requiring development to be of the highest standard of design that respects local context and character. Camden has a unique and rich built and natural heritage, with many areas with their own distinct character, created by a variety of elements including building style and layout, history, natural environment including open spaces and gardens, and mix of uses. We have a duty to respect these areas and buildings and, where possible, enhance them when constructing new buildings and in alterations and extensions.
- 24.2 Policy DP24 contributes to implementing the Core Strategy by setting out our detailed approach to the design of new developments and alterations and extensions. These principles will ensure that all parts of Camden's environment are designed to the highest possible standards and contribute to providing a healthy, safe and attractive environment.
- 24.3 The Core Strategy also sets out our approach to other matters related to design, such as tackling climate change through promoting higher standards (CS13), the importance of community safety and security (CS17) and protecting amenity from new development (CS5). Further guidance on design is contained in our Camden Planning Guidance supplementary document.

DP POLICY

DP24 – Securing high quality design

The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility.



Promoting good design

- 24.4 The Council is committed to design excellence and a key strategic objective of the borough is to promote high quality, sustainable design. This is not just about the aesthetic appearance of the environment, but also about enabling an improved quality of life, equality of opportunity and economic growth. We will therefore apply policy DP24 to ensure that all developments throughout the borough, including alterations and extensions to existing buildings, are of the highest standard of design. In accordance with government guidance in Planning Policy Statement (PPS) 1 – *Delivering Sustainable Development* we will not accept design that is inappropriate to its context or which fails to take opportunities to improve the character and quality of an area and the way that it is used by residents and visitors.
- 24.5 Camden is a densely built-up borough where most development involves the replacement, extension or conversion of existing buildings. Design should respond creatively to its site and its context. This concerns both smaller-scale alterations and extensions and larger developments, the design and layout of which should take into account the pattern and size of blocks, open spaces, gardens and streets in the surrounding area (the ‘urban grain’).
- 24.6 The Council seeks to encourage outstanding architecture and design, both in contemporary and more traditional styles. Innovative design can greatly enhance the built environment and, unless a scheme is within an area of homogenous architectural style that is important to retain, high quality contemporary design will be welcomed. When assessing design, we will take into account government/CABE guidance *By Design – Urban Design in the planning system: towards better practice* and our own Camden Planning Guidance supplementary document.
- 24.7 Development should consider:
- the character and constraints of its site;
 - the prevailing pattern, density and scale of surrounding development;
 - the impact on existing rhythms, symmetries and uniformities in the townscape;
 - the compatibility of materials, their quality, texture, tone and colour;
 - the composition of elevations;
 - the suitability of the proposed design to its intended use;
 - its contribution to public realm, and its impact on views and vistas; and
 - the wider historic environment and buildings, spaces and features of local historic value.
- 24.8 Buildings should be designed to be as sustainable as possible. Environmental design and construction measures are set out in Policy DP22 – *Promoting sustainable design and construction*. Sustainable development also embraces principles of social sustainability which can be addressed by new development which:
- provides comfortable, safe, healthy and accessible space for its users;
 - is fit for purpose and can accommodate future flexibility of use;
 - provides a mix of uses and types of accommodation and provides for a range of needs within the community; and
 - provides sufficient amenity space for the promotion of health and wellbeing.



- 24.9 The re-use of existing buildings preserves the 'embodied' energy expended in their original construction, minimises construction waste and reduces the use of new materials. Many historic buildings display qualities that are environmentally sustainable and have directly contributed to their survival, for example the use of durable, natural, locally sourced materials, 'soft' construction methods, good room proportions, natural light and ventilation and ease of alteration. The retention and adaptation of existing buildings will be encouraged.
- 24.10 Due to the dense nature of Camden with extensive range and coverage of heritage assets, such as conservation areas, numerous listed buildings and five strategic views and two background views crossing the borough, the Council does not consider that it is practical to identify broad areas either suitable, or not suitable, for tall buildings. In the borough, a site may be suitable for a tall building while adjacent sites are not, due to impact on either views, conservations areas or listed buildings. Indeed, in some cases, suitability for a tall building differs across a single site. Given Camden's strategic environmental characteristics, the entire borough is considered as being within the 'sensitive' category, as defined by the English Heritage/CABE Guidance on Tall Buildings (2007). Tall building proposals in Camden will therefore merit detailed design assessments. As part of the revision of the Camden Planning Guidance SPD further clarity will be provided on tall buildings and design issues in Camden.

Respecting local character

- 24.11 Given the highly built-up nature of Camden, careful consideration of the characteristics of a site, features of local distinctiveness, and the wider context is needed in order to achieve high quality development which integrates into its surroundings.
- 24.12 In order to best preserve and enhance the positive elements of local character within the borough, we need to recognise and understand the factors that create it. Designs for new buildings, and alterations and extensions, should respect the character and appearance of the local area and neighbouring buildings. Within areas of distinctive character, development should reinforce those elements which create the character. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials. In areas of low quality or where no pattern prevails, development should improve the quality of an area and give a stronger identity.
- 24.13 Development should not undermine any existing uniformity of a street or ignore patterns or groupings of buildings. Overly large extensions can disfigure a building and upset its proportions. Extensions should therefore be subordinate to the original building in terms of scale and situation unless, exceptionally, it is demonstrated that this is not appropriate given the specific circumstances of the building. Past alterations or extensions to surrounding properties should not necessarily be regarded as a precedent for subsequent proposals for alterations and extensions.
- 24.13 Design and Access statements should include an assessment of local context and character, and set out how the development has been informed by, and responds to it. We have prepared a series of Conservation Area Statements, Appraisals and Management Plans which describe the character and appearance of individual conservation areas and set out how the Council considers each can be conserved and enhanced. These should be used by developers to inform their understanding of the special character of the area, and we will take these into account when assessing development proposals in conservation areas. Development Policy DP25 – *Conserving Camden's heritage* provides further guidance on the preservation and enhancement of the historic environment.

Detailing and materials

- 24.15 Architectural detailing should be carefully integrated into a building. In new development, detailing should be carefully considered so that it conveys quality of design and creates an attractive and interesting building. Architectural features on existing buildings, such as cornices, mouldings, architraves, porches and chimneys should be retained wherever possible, as their loss can harm a building by eroding its detailing. The insensitive replacement of windows and doors and the cladding and painting of masonry can also spoil the appearance of buildings and can be particularly damaging if the building forms part of a uniform group.
- 24.16 Schemes should incorporate materials of an appropriately high quality. The durability and visual attractiveness of materials will be carefully considered along with their texture, colour and compatibility with existing materials. Alterations and extensions should be carried out in materials that match the original or neighbouring buildings, or, where appropriate, in materials that complement or enhance a building or area.

Contributing to the street frontage

- 24.17 Buildings should be visually interesting at street level, with entrances and windows used to create active frontages, which allow overlooking of public areas, provide a sense of vitality and contribute to making Camden a safer place (see Core Strategy policy CS17). Ground floors should be occupied by active uses and should not turn their back on streets and other public spaces.

Incorporating building services equipment

- 24.18 Building services equipment, such as air cooling, heating, ventilation and extraction systems, lift and mechanical equipment, as well as fire escapes, ancillary plant and ducting should be contained within the envelope of a building or be located in a visually inconspicuous position.

Responding to natural features

- 24.19 New developments should respond to the natural assets of a site and its surroundings, such as slopes and height differences, trees and other vegetation. Extensions and new developments should not cause the loss of any existing natural habitats, including private gardens. Core Strategy policy CS15 – *Protecting and improving our parks and open spaces and encouraging biodiversity* provides further guidance on nature conservation in Camden and the Council's strategy for trees.
- 24.20 Development within rear gardens and other undeveloped areas can often have a significant impact upon the amenity and character of an area. Gardens help shape their local area, provide a setting for buildings and can be important visually. Therefore they can be an important element in the character and identity of an area (its 'sense of place'). We will resist development that occupies an excessive part of a garden, and where there is a loss of garden space which contributes to the character of the townscape.
- 24.21 Development will not be permitted which fails to preserve or is likely to damage trees on a site which make a significant contribution to the character and amenity of an area. Where appropriate the Council will seek to ensure that developments make adequate provision for the planting and growth to maturity of large trees.





Incorporating Landscaping

- 24.22 As with buildings, consideration of context is essential in the design of new hard and soft landscaping. Hard landscape elements (surfaces, boundary treatments etc), and the materials from which they are made, play a significant role in defining the character and attractiveness of a site or area and reinforcing local distinctiveness. New planting can contribute to the attractiveness of a development, soften and balance the impact of buildings and contribute to the biodiversity value of a site. Effective maintenance is often essential to the success of soft landscaping (shrubs, grass etc) and, where appropriate, the Council will expect planting plans to be accompanied by a maintenance schedule. New hard and soft landscaping should be of high quality and should positively respond to its local character.

Providing amenity space

- 24.23 Private outdoor amenity space can add significantly to resident's quality of life and applicants are therefore encouraged to explore all options for the provision of new private outdoor space. Gardens, balconies and roof terraces are greatly valued and can be especially important for families. However, the densely built up nature of the borough means that the provision of private amenity space can be challenging, and the Council will require that the residential amenity of neighbours be preserved, in accordance with policy DP26 – *Managing the impact of development on occupiers and neighbours* and Core Strategy policy CS5 – *Managing the impact of growth and development*.

Accessibility

- 24.24 In line with policy DP29 – *Improving access* the Council will expect all buildings and places to meet the highest practicable standards of access and inclusion. Any adaptation of existing buildings must therefore address this issue and respond to access needs whilst ensuring that alterations are sympathetic to the building's character and appearance. Policy DP25 – *Conserving Camden's heritage* provides further guidance on providing access to listed buildings.

Key evidence and references

- By Design: Urban Design in the Planning System – Towards Better Practice; DETR/CABE; 2000
- Planning Policy Statement (PPS) 1 – Delivering Sustainable Development, 2005
- Planning Policy Statement (PPS) 12 – Local Spatial Planning, 2008
- Making design policy work, CABE; 2005
- The London Plan (consolidated with alterations since 2004); Mayor of London; 2008
- Building in Context, CABE/English Heritage, 2002
- Tree and Woodland Framework for London, Mayor of London, 2005

DP25. Conserving Camden's heritage

- 25.1 Camden has inherited a rich architectural heritage with many special places and buildings from many different eras in the area's history, from the historic villages of Hampstead and Highgate to Georgian squares and John Nash's Regent's Park terraces, from the Victorian engineering of St Pancras Station to iconic modern structures such as Centrepont. These places and buildings add to the quality of our lives by giving a sense of local distinctiveness, identity and history. 39 areas, covering much of the borough, are designated as conservation areas, recognising their special architectural or historic interest and their character and appearance. Also, thousands of buildings in Camden are nationally listed for their special historical or architectural interest (see map 3). We have a responsibility to preserve and, where possible, enhance these areas and buildings. This policy helps to implement Core Strategy policy CS14 – *Promoting high quality places and conserving our heritage*.

DP POLICY

DP25 – Conserving Camden's heritage

Conservation areas

In order to maintain the character of Camden's conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

Listed buildings

To preserve or enhance the borough's listed buildings, the Council will:

- e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- g) not permit development that it considers would cause harm to the setting of a listed building.

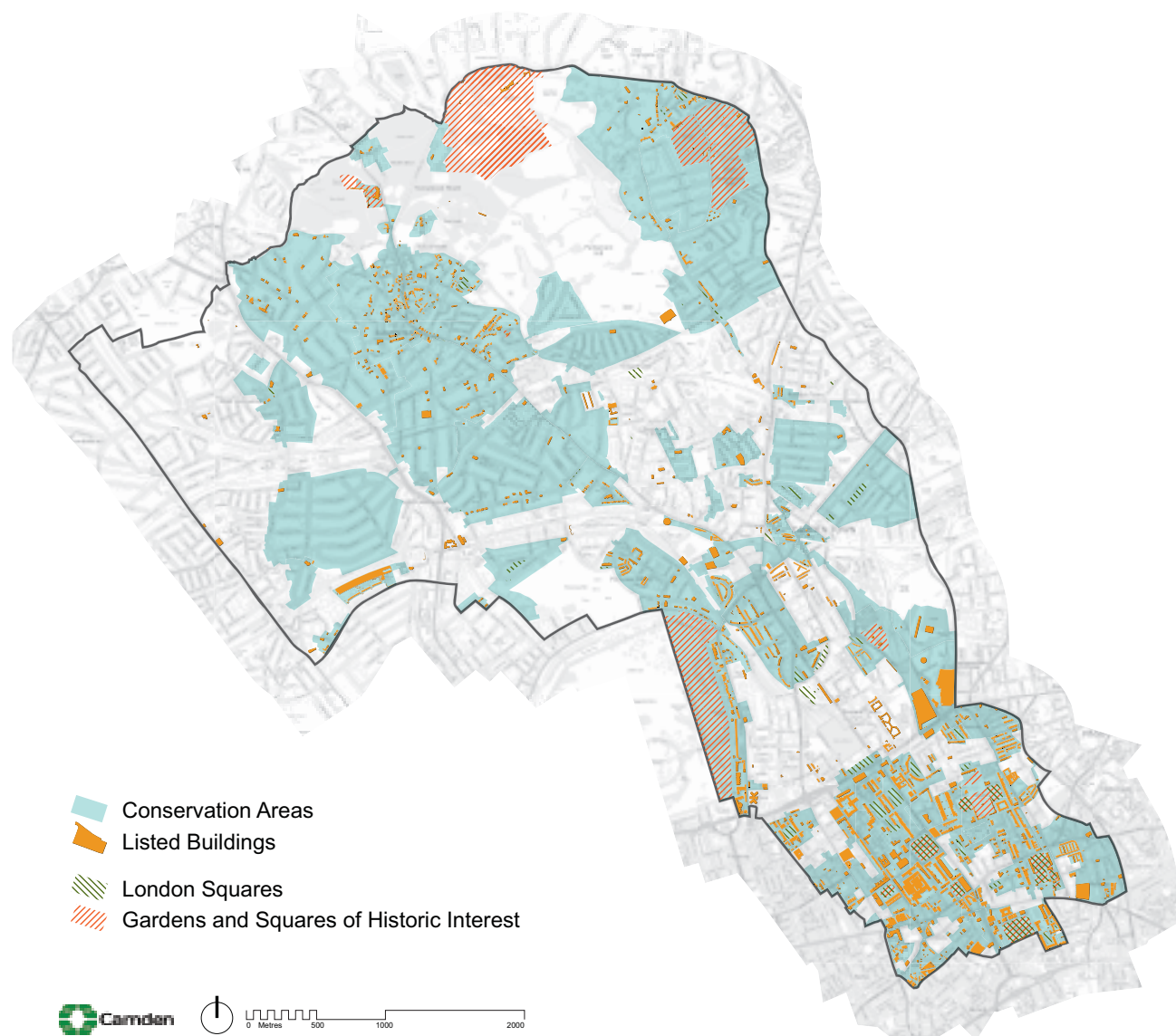
Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets

The Council will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

Map 3: Heritage



This map is based on Ordnance Survey Material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office ©. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence number LA100019726, year 2010.

Conservation Areas

- 25.2 In order to preserve and enhance important elements of local character, we need to recognise and understand the factors that create this character. The Council has prepared a series of conservation area statements, appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas and set out how we consider they can be preserved and enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a way that retains the distinctive characters of our conservation areas and will expect new development to contribute positively to this. The Council will therefore only grant planning permission for development in Camden's conservation areas that preserves and enhances the special character or appearance of the area. The character of conservation areas derive from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing, and uses. These elements should be identified and responded to in the design of new development. Design and Access Statements should include an assessment of local context and character, and set out how the development has been informed by it and responds to it.

- 25.3 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the existing. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration. The Council will consider the introduction of Article 4 Directions to remove permitted development rights for the removal or alterations of traditional details where the character and appearance of a conservation area is considered to be under threat.
- 25.4 Historic buildings in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving – preserving their special interest and ensuring their long term survival. For detailed advice on energy saving in historic buildings and conservation areas visit the English Heritage website and our Camden Planning Guidance supplementary document. Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment.
- 25.5 The value of existing gardens, trees and landscaping to the character of the borough is described in DP24 – Securing High Quality Design, and they make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees and/or garden space where this is important to the character and appearance of a conservation area. DP27 – Basements and lightwells provides further guidance on this issue where landscaping may be affected by basements and other underground structures.
- 25.6 The Council has a general presumption in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area, whether they are listed or not so as to preserve the character and appearance of the conservation area. We will not grant conservation area consent for the total or substantial demolition of such a building where this would harm the appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention. Applicants will be required to justify the demolition of a building that makes a positive contribution to a conservation area, having regard to Policy HE7 of Planning Policy Statement (PPS) 5: Planning for the Historic Environment, Camden's conservation area statements, appraisals and management plans and any other relevant supplementary guidance produced by the Council.



- 25.7 When considering applications for demolition, the Council will take account of group value, context and setting of buildings, as well as their quality as individual structures and any contribution to the setting of listed buildings. Applications must clearly show which buildings or parts of buildings are to be demolished.
- 25.8 Applications for total or substantial demolition in conservation areas must demonstrate to the Council's satisfaction that effective measures will be taken during demolition and building works to ensure structural stability of retained parts and adjoining structures. Before conservation area consent for demolition is granted, the Council must be satisfied that there are acceptable detailed plans for the redevelopment. Any replacement building should enhance the conservation area to an appreciably greater extent than the existing building. When a building makes little or no contribution to the character and appearance of a conservation area, any replacement building should enhance the conservation area to an appreciably greater extent than the existing building.
- 25.9 Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.
- 25.10 Our Camden Planning Guidance supplementary document provides further information on our approach to conservation areas.

Listed buildings

- 25.11 Camden's listed buildings and structures provide a rich and unique historic and architectural legacy. They make an important and valued contribution to the appearance of the borough and provide places to live and work in, well known visitor attractions, and cherished local landmarks. We have a duty to preserve and maintain these for present and future generations. There are over 5,600 buildings and structures in Camden that are on the statutory list for their special architectural or historic interest.
- 25.12 The Council has a general presumption in favour of the preservation of listed buildings. Total demolition, substantial demolition and rebuilding behind the façade of a listed building will not normally be considered acceptable. The matters which will be taken into consideration in an application for the total or substantial demolition of a listed building are those set out in Policy HE7 of PPS5.





- 25.13 In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Consent is required for any alterations, including some repairs, which would affect the special interest of a listed building. The matters which will be taken into consideration in an application for alterations and extensions to a listed building are those set out in Policy HE7 of PPS5.
- 25.14 Where listed buildings are being altered for the provision of access for people with disabilities, the Council will balance their needs with the interests of conservation and preservation. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs, and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions, and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.
- 25.15 The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it often can extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement.
- 25.16 Proposals that reduce the energy consumption of listed buildings will be welcomed provided that they do not cause harm to the special architectural and historic interest of the building or group. Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing and secondary glazing, more efficient boilers and heating/lighting systems, and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics.
- 25.17 Our Camden Planning Guidance supplementary document provides further information on our approach to listed buildings.

Map 4: Archaeological Priority Areas



Archaeology

25.18 Camden has a rich archaeological heritage comprised of both above and below ground remains, in the form of individual finds, evidence of former settlements and standing structures. These remains are vulnerable to modern development and land use. There are 13 archaeological priority areas in the borough (see map 4):

Hampstead Heath	Hampstead	Highgate
London Suburbs	South End	Bagnigge Wells
St Pancras	West End	Canalside Industry
Kentish Town	Kilburn	
Battle Bridge	Belsize	

- 25.19 The archaeological priority areas provide a general guide to areas of archaeological remains, but do not indicate every find site in the borough. These are based on current knowledge and may be refined or altered as a result of future archaeological research or discoveries.
- 25.20 It is likely that archaeological remains will be found throughout the borough, both within and outside the archaeological priority areas. Many archaeological remains have yet to be discovered, so their extent and significance is not known. When researching the development potential of a site, developers should, in all cases, assess whether the site is known or is likely to contain archaeological remains. Where there is good reason to believe that there are remains of archaeological importance on a site, the Council will consider directing applicants to supply further details of proposed developments, including the results of archaeological desk-based assessment and field evaluation. Scheduled monument consent must be obtained before any alterations are made to scheduled ancient monuments. Camden has only one scheduled ancient monument: Boadicea's Grave in Hampstead Heath.
- 25.21 If important archaeological remains are found, the Council will seek to resist development which adversely affects remains and to minimise the impact of development schemes by requiring either in situ preservation or a programme of excavation, recording, publication and archiving of remains. There will usually be a presumption in favour of in situ preservation of remains and, if important archaeological remains are found, measures should be adopted to allow the remains to be permanently preserved in situ. Where in situ preservation is not feasible, no development shall take place until satisfactory excavation and recording of the remains has been carried out on site, and subsequent analysis, publication and archiving undertaken by an archaeological organisation approved by the Council.
- 25.22 The Council will consult with, and be guided by, English Heritage and the Greater London Archaeology Advisory Service (GLAAS) on the archaeological implications of development proposals. The Greater London Sites and Monuments Record, maintained by English Heritage, contains further information on archaeological sites in Camden. When considering schemes involving archaeological remains, the Council will also have regard to government Planning Policy Guidance (PPG) 16 – Archaeology and Planning.

Other heritage assets

- 25.23 In addition to conservation areas, listed buildings and archaeological remains, Camden contains 14 Parks and Gardens of Special Historic Interest, as identified by English Heritage. There are also 53 London Squares in the borough protected by the London Squares Preservation Act 1931. The Council will encourage the management of Parks and Gardens of Special Historic Interest and London Squares to maintain, and where appropriate, enhance their value and protect their setting. As set out within Core Strategy policy CS14 – *Promoting high quality places and conserving our heritage*, we will consult with English Heritage over proposals affecting these parks and gardens.

Key evidence and references

- Greater London Sites and Monuments Record; English Heritage
- Guidance on conservation area appraisals, English Heritage, 2006
- Guidance on the management of conservation areas, English Heritage, 2006

DP26. Managing the impact of development on occupiers and neighbours

- 26.1 Camden's Core Strategy seeks to sustainably manage growth so that it takes place in the most appropriate locations and meets our needs while continuing to conserve and enhance the features that make Camden such an attractive place to live, work and visit (see policy CS1). Promoting and protecting high standards of amenity is a key element in this and will be a major consideration when the Council assesses development proposals. Core Strategy policies CS5 – *Managing the impact of growth and development* and CS14 – *Promoting high quality places and conserving our heritage* set out our overall approach to protecting the amenity of Camden's residents, workers and visitors, a major factor in people's quality of life. Policy DP26 contributes to the implementation of the Core Strategy by making sure that the impact of a development on occupiers and neighbours is fully considered.

DP POLICY

DP26 – Managing the impact of development on occupiers and neighbours

The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors we will consider include:

- a) visual privacy and overlooking;
- b) overshadowing and outlook;
- c) sunlight, daylight and artificial light levels;
- d) noise and vibration levels;
- e) odour, fumes and dust;
- f) microclimate;
- g) the inclusion of appropriate attenuation measures.

We will also require developments to provide:

- h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
- i) facilities for the storage, recycling and disposal of waste;
- j) facilities for bicycle storage; and
- k) outdoor space for private or communal amenity space, wherever practical.

- 26.2 Development should avoid harmful effects on the amenity of existing and future occupiers and to nearby properties. When assessing proposals the Council will take account the considerations set out in policy DP26. The Council's Camden Planning Guidance supplementary document contains detailed guidance on the elements of amenity.

Visual privacy, overlooking, overshadowing, outlook, sunlight and daylight

- 26.3 A development's impact on visual privacy, overlooking, overshadowing, outlook, access to daylight and sunlight and disturbance from artificial light can be influenced by its design and layout, the distance between properties, the vertical levels of onlookers or occupiers and the angle of views. These issues will also affect the amenity of the new occupiers. We will expect that these elements are considered at the design stage of a scheme to prevent potential negative impacts of the development on occupiers and neighbours. To assess whether acceptable levels of daylight and sunlight are available to habitable spaces, the Council will take into account the standards recommended in the British Research Establishment's Site Layout Planning for Daylight and Sunlight – *A Guide to Good Practice* (1991).

Artificial lighting levels

- 26.4 Lighting creates a sense of safety and can enable activities in the evenings and at night. It can be used to highlight landmark buildings and add vitality to our streets. Lighting can increase the potential for natural surveillance and, where used correctly, can reduce the opportunity for criminal activity and increase the likelihood of it being challenged and/or reported. However, poorly designed internal and external lighting or lighting that operates for an excessive period of time is a form of pollution that can harm the quality of life for those living nearby, affect wildlife and waste energy. Camden's dense character means that light pollution can be a bigger problem in the borough than in lower density areas where uses are not so close together. For example, lighting from conservatories can affect neighbours living above, as well as to the sides and rear, and the lighting of advertisements can affect people living nearby. Glare and light spillage from poorly designed lighting can make it less easy to see things at night and effect wildlife as well as people. Lighting should only illuminate the intended area and not affect or impact on its surroundings. Schemes involving floodlighting and developments in sensitive areas, such as adjacent to sites of nature conservation importance, should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife. For further details on lighting and occupiers and biodiversity please see our Camden Planning Guidance supplementary document.

Noise and vibration

- 26.5 Noise/vibration pollution has a major effect on amenity and health and can be a particularly significant issue in Camden given the borough's dense urban nature. More detail on how to prevent disturbance from noise and vibration, including the requirement for mitigation measures can be found in policy DP28.

Odours, fumes and dust

- 26.6 Camden suffers from extremely poor air quality which has a harmful impact on health and the environment. More detail on how the Council is tackling poor air quality can be found in policy DP32. Camden Planning Guidance provides information on how developments should be designed to prevent occupants from being exposed to air pollution, including mitigation measures.





- 26.7 Odours, fumes and dust can be generated from commercial cooking, industrial process and construction and demolition. We will require all development likely to generate odours to prevent them from being a nuisance by installing appropriate extraction equipment and other mitigation measures. Further details on mitigation measures and where extraction equipment should be located can be found in Camden Planning Guidance. Further details on limiting noise from extraction equipment can be found in DP28. The Council will limit the disturbance from dust due to construction and demolition by expecting developers and their contractors to follow the London Councils' Best Practise Guidance *The control of dust and emissions from construction and demolition*. We will also expect developers to sign up to the Considerate Constructors Scheme. Details of how these will be implemented should be provided in a Construction Management Plan. Please see below for further details on Construction Management Plans.

Microclimate

- 26.8 Developments, especially when large, can alter the local climate. For example, a light coloured building that reflects heat will stay cool on the inside and the outside, whereas a dark building will absorb heat during the day to raise internal temperatures and slowly release this heat as the temperature cools, keeping the local air temperature warmer. Buildings can also affect the flow of air and cause wind tunnels. All developments should consider local topography and the local microclimate in their design. Developments large enough to alter the local climate will be required to submit a statement demonstrating how the design has considered local conditions. Detail of what is expected in such a statement can be found in the Camden Planning Guidance.

Attenuation measures and Construction Management Plans

- 26.9 Most potential negative effects of a development can be designed out or prevented through mitigation measures. For example, appropriately located and insulated extraction equipment can prevent nuisance caused by strong odours and fumes. An air tight building with mechanical ventilation and good insulation can make living adjacent to railways and busy roads acceptable with regards to noise, vibration and internal air quality. We will require any attenuation measures to be identified prior to planning permission being granted and secured for the lifetime of the development.

26.10 Disturbance from development can also occur during the construction phase. Measures required to reduce the impact of demolition, excavation and construction works must be outlined in a Construction Management Plan. We will require Construction Management Plans to identify the potential impacts of the construction phase of the development and state how any potential negative impacts will be mitigated. Construction Management Plans may be sought for:

- major developments;
- basement developments;
- developments involving listed buildings or adjacent to listed buildings;
- developments that could affect wildlife;
- developments on sites with poor or limited access; and
- developments that could cause significant disturbance due to their location or the anticipated length of the, demolition, excavation or construction period.

For further details on construction management plans please refer to our Camden Planning Guidance supplementary. Please see policy DP27 for more on our approach to basements.

Standards of accommodation

26.11 The size of a dwelling and its rooms, as well as its layout, will have an impact on the amenity of its occupiers. Residential standards and guidance are contained in our Camden Planning Guidance supplementary document. Policy DP6 outlines our approach to Lifetime Homes and further detail can be found in Camden Planning Guidance. Details on our approach to providing facilities for waste and for bicycle storage can also be found in Camden Planning Guidance. Details on our requirements for the provision of cycle parking can be found in DP18 – *Parking standards and limiting the availability of car parking*.

26.12 Outdoor amenity space provides an important resource for residents, which is particularly important in Camden given the borough's dense urban environment. It can include private provision such as gardens, courtyards and balconies, as well as communal gardens and roof terraces. The Council will expect the provision of gardens in appropriate developments, and particularly in schemes providing larger homes suitable for families. However, we recognise that in many parts of the borough this will not be realistic or appropriate. In these locations, the provision of alternative outdoor amenity space, for example, balconies, roof gardens or communal space will be expected. These amenity spaces should be designed to limit noise and disturbance of other occupiers and so not to unacceptably reduce the privacy of other occupiers and neighbours.

Key evidence and references

- Air Quality Action Plan 2009-13
- Camden's Noise Strategy, 2002
- Planning Policy Guidance (PPG) 24: Planning and Noise
- The London Plan (consolidated with alterations since 2004); Mayor of London; 2008
- Cleaning London's Air: The Mayor's Air Quality Strategy (2002)
- Sounder City – The Mayor's Ambient Noise Strategy; Mayor of London; 2004
- Institution of Lighting Engineers web-site, <http://www.ile.org.uk>

DP32. Air quality and Camden's Clear Zone

- 32.1 The Core Strategy highlights the need to promote higher standards of air quality within the borough. It is recognised that parts of Camden have some of the poorest air quality levels in London and consequently the whole of the borough has been declared an Air Quality Management Area. The Council has produced an Air Quality Action Plan that identifies actions and mitigating measures necessary to improve air quality in the borough.
- 32.2 A key challenge therefore is to make our local environment better by reducing air pollution. This underpins many of the Core Strategy policies, including CS9 – *Achieving a successful Central London*, CS11 – *Promoting sustainable and efficient travel*, CS13 – *Tackling climate change through promoting higher environmental standards* and CS16 – *Improving Camden's health and well-being*.
- 32.3 The designation of Central London as a Clear Zone region is a key way to reduce congestion and promote walking and cycling as a way of improving the borough's air quality.

DP POLICY

DP32 – Air quality and Camden's Clear Zone

The Council will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality.

The Council will also only grant planning permission for development in the Clear Zone region that significantly increases travel demand where it considers that appropriate measures to minimise the transport impact of development are incorporated. We will use planning conditions and legal agreements to secure Clear Zone measures to avoid, remedy or mitigate the impacts of development schemes in the Central London Area.

Air Quality

- 32.4 The Council will take into account impact on air quality when assessing development proposals. Regard will be paid to Camden's Air Quality Action Plan and to Cleaning London's Air: The Mayor's Air Quality Strategy. Where development could potentially cause significant harm to air quality, we require an air quality assessment. Where the assessment shows that a development would cause significant harm to air quality, planning permission will be refused unless mitigation measures are adopted to reduce the impact to acceptable levels. Further guidance on air quality and when assessments will be required is provided in the Council's Camden Planning Guidance supplementary planning document.
- 32.5 Our growth areas of Euston, Kings Cross, Holborn, Tottenham Court Road and West Hampstead (see Core Strategy policy CS2) are located along busy roads and currently experience poor levels of air quality and disturbance from noise. Developments in these areas will need to be well protected against air and noise pollution to ensure they are suitable for occupation. Where mechanical ventilation is required due to poor environmental conditions we will expect developments to incorporate high standards of energy efficient design, for example 'Passivhaus' principles. Policy DP22 – *Promoting sustainable design and construction* gives more guidance on energy efficient design and Passivhaus. Our Camden Planning Guidance supplementary document gives more information on mitigating against poor air quality and Passivhaus principles.

- 32.6 Core Strategy policy CS13 promotes the use of renewable energy technologies to reduce carbon emissions and tackle climate change. The burning of biomass in a boiler is identified as a renewable energy resource in the Mayor's Energy Strategy. Boilers can burn solid biomass or liquid biofuels and are popular on high density sites with small footprints as their use can be the only way for development to reduce their carbon emissions by 20%. However, in central London there are air quality implications for the use of biomass as higher levels of nitrogen oxides (NOx) and particulates are released than conventional gas boilers or gas-fired community heating facilities. Given the existing poor air quality in Camden, the use of biomass as a renewable energy source will be the Council's least preferred option for the provision of renewable energy. We will expect developments to focus on energy efficiency and an efficient energy supply. Details on potential low carbon and renewable energy technologies can be found in the Camden Planning Guidance and also within policy DP22 – *Promoting sustainable design and construction*.

Camden's Clear Zone

- 32.7 Camden has been a leading council in the development of policies and initiatives to reduce the impact of transport on the environment. We are the lead borough in the Clear Zone Partnership, which covers the Central London part of Camden, with the City of Westminster and the Corporation of London. The Clear Zone Partnership aims to reduce congestion, noise and air pollution; encourage a shift to walking, cycling and public transport; and improve the urban realm. It uses partnership working, innovative technologies and sustainable transport measures to achieve these aims. The Council will expect development schemes to contribute to Clear Zone measures where appropriate.
- 32.8 The objectives of the Clear Zone region are to:
- reduce congestion and pollution through piloting sustainable transport measures and innovative technologies;
 - improve air quality;
 - reduce noise pollution;
 - improve accessibility and mobility for walking, cycling and public transport;
 - improve our streets, places and open spaces;
 - make it easier for people to find their way around through installing pedestrian and cycling signage systems;
 - encourage cycling by promoting secure cycle stations and city bike hire schemes;
 - promote car-free and traffic reduced areas and developments, complemented by car clubs;
 - reduce the amount of through traffic;
 - promote good management in development schemes through construction, servicing and waste management plans; and
 - promote alternatively fuelled and low emission vehicles for freight distribution and servicing.
- 32.9 More detail on the Clear Zone and the types of measures we will promote within it, such as travel plans, car clubs, construction, servicing and waste management plans, pedestrian and cycle facilities, is set out in the Council's Camden Planning Guidance supplementary document.

Key evidence and references

- Camden's Noise Strategy, 2002
- The London Plan (Consolidated with Alterations since 2004), 2008
- Planning Policy Guidance 24: Planning and noise
- Camden's Air Quality Action Plan
- Cleaning London's Air: The Mayor's Air Quality Strategy

